



ConnectGen Chautauqua County LLC

South Ripley Solar Project

Matter No. 21-00750

DRAFT

Complaint Management Plan

This DRAFT Complaint Management Plan has been prepared and submitted as part of the South Ripley Solar Project's 94-c Application. Per ORES Regulations §900-10.2, a Final Communication and Complaint Management Plan is required to be filed as part of Pre-Construction Compliance Filings. This plan will be updated, and a final version filed prior to Project construction.

TABLE OF CONTENTS

1.0	Introduction	1
	Facility Description.....	1
	Complaint Management Plan Purpose	1
2.0	Communications	1
	Pre-Application Outreach	1
	Pre-Construction Outreach.....	2
	Disseminating Complaint Resolution Procedures.....	3
3.0	Complaint Management Process.....	3
	Complaint Reporting.....	3
	Complaint Response Program	3
	Complaint Identification	4
	Complaint Investigation	4
	Response	4
	Tracking/Documentation.....	5
4.0	Attachment A: Complaint Log Sheet.....	6
5.0	Attachment B: Complaint Tracking Log.....	7

1.0 Introduction

Facility Description

ConnectGen Chautauqua County LLC (the “Applicant”) is proposing to develop The South Ripley Solar Project (the “Facility”), a proposed 270 megawatt (MW) alternating current (AC) solar energy generating project located on private leased lands within the Town of Ripley, Chautauqua County, New York. The Facility consists of the construction and operation of a utility-scale solar power project, battery energy storage system, and associated electrical equipment and civil improvements. A list of Facility components can be found in Exhibit 2 of this Application.

Complaint Management Plan Purpose

The development of meaningful community relationships and the establishment of the Facility as a good neighbor to the host community are critical components of the Applicant’s approach to successful project development. This Complaint Management Plan (the “Plan”) provides the Applicant’s protocols for responding to stakeholder concerns during the Facility’s construction, operation, and decommissioning. To that end, the Plan establishes a process and procedures for the Applicant to members of the public to notify the Applicant of concerns. This Plan includes specific commitments for addressing public complaints, and procedures for dispute resolution. The Complaint Management Plan includes steps on informing the public about the complaint process, the process for registering a complaint, protocols for gathering and analyzing information regarding complaints, and procedures that may be unique for certain types of complaints (e.g., noise) or for different stages of the Facility (e.g., construction and operation). The plan also describes actions that the Applicant will take if the complaint remains unresolved after all proposed steps are followed.

2.0 Communications

Timely communication and information sharing is critical to limit concerns from the host community and local stakeholders. If the community is made aware ahead of time of potentially disruptive activities (i.e., anticipated construction noise or potential traffic delays), and is afforded the opportunity to plan accordingly, the potential for concern or complaints to arise may be reduced.

Pre-Application Outreach

The Applicant has undergone a comprehensive multi-year public engagement effort in relation to the development of the Facility, with frequent consultations with Town, County, and State officials, neighbors and members of the community, and local stakeholders, including emergency first responders and local school districts to communicate details regarding Facility development, construction, and operation. A comprehensive list of public engagement activities can be found in Appendix 2-B.

Additionally, the Applicant utilizes the following methods to enhance public outreach and engagement. It is anticipated that the Applicant will continue to actively engage the public using the following methods throughout project development, construction, and operation. This contact information will be updated for

pre-construction compliance.

Project Website: www.southripleysolar.com

- News Bulletins
- Notices
- Project Information

Project Facebook: [South Ripley Solar Project](#)

- News Bulletins
- Notices

Project Hotline: (800) 338-8905

- Speak to a project representative regarding questions or concerns

Project Email: info@southripleysolar.com

- Contact to a project representative regarding questions or concerns

Mailing List: The Applicant also maintains a mailing list for local landowners (all property owners within 1-mile of the Facility Site), local stakeholders, and elected officials.

- News Bulletins
- Notices

Pre-Construction Outreach

Prior to construction of the Facility, the Applicant will again reach out to participating landowners, neighbors, Town officials, and other local stakeholders to discuss details of the construction process including the schedule, key activities, workforce plans, and potential effects from project activities (e.g. transportation/traffic, sound, etc). The Applicant will provide written notice to the local community and stakeholders regarding the start of construction, the timing of various phases of construction activities, and the manner in which the public can voice complaints and the process for addressing them, as required by the Section 94-c regulations: §900-10.2. Information regarding the complaint procedures will also be posted on the Project website.

In addition to this Complaint Management Plan, stakeholders will be informed of the Facility's Site Security Plan and Safety Response Plan. Cumulatively, these plans provide important procedures for responding to community concerns with regard to safety, security, and general activities on and in the vicinity of the Facility. The Applicant will meet with local emergency first responders to review the final Site Security Plan

and Safety Response Plan and will be responsible for continued consultation with these stakeholders during the life of the Facility.

To minimize the potential for complaints the Applicant has implemented various best management practices associated with typical construction activities, such as speed limits, dust control practices, and coordinated transportation plans. The transport of major components and other activities with the potential to disrupt neighbors will be coordinated with local authorities.

The Applicant intends to comply fully with all conditions of the authorizing permits applying to construction and in accordance with an Environmental Monitoring Plan. Safety, community relations, and environmental compliance issues will be addressed in the daily planning meetings held by the contractor(s) during construction.

Disseminating Complaint Resolution Procedures

Prior to commencing construction, contact information for the Site Manager will be made available to the participating landowners, neighboring residents, Town officials, County officials, local stakeholders (local emergency response, local Highway Superintendent, local school districts), and permitting agencies. Prior to construction completion, contact information for the Operation Site Manager will also be made available. In addition, Applicant will publish a toll-free telephone number and an email address designated for purposes of receiving communications from the public.

3.0 Complaint Management Process

Complaint Reporting

Complaints by neighboring residents or other affected individuals may be made through the following channels:

- Calling the local or toll-free telephone number
- Writing to the Applicant at its designated email address
- Stopping by the temporary on-site construction office (during construction)
- Writing to the Applicant at its local address or at its principal place of business

Complaint Response Program

The following protocols will be implemented as part of the program of receiving, responding to, and resolving complaints.

Complaint Identification

The Facility personnel will regularly check the toll-free number and email address to determine if any complaints have been received. In the event that the Applicant receives a complaint, a representative will reach out to the complainant within three business days to obtain additional information about the complaint. The Applicant encourages those contacting the company with complaints to include the following details (which will be filled out during subsequent outreach if not supplied with the original complaint):

- Name, address, and contact information of the person submitting the complaint
- Date, time, duration of the event
- Nature of the complaint
- Location of the person at the time of event
- Description of the complaint
- Additional information deemed relevant

Complaint Investigation

After receiving the necessary information regarding a complaint, The Applicant will investigate the complaint to determine whether it has merit. Investigations will include identifying and characterizing the nature of the complaint (traffic, dust, noise, etc.) and to the extent possible, the source (construction vehicles and equipment, environmental conditions, etc.).

The type of investigation conducted will differ based on the nature of the complaint. In some cases, a simple on-site investigation may be all that is necessary to identify the source of a particular problem, such as construction noise. In other cases, additional third-party testing may be required to assess whether a particular problem identified by a complainant is, in fact, occurring. Also, the Applicant may require the cooperation of the complainant (including, but not limited to, the gathering of information concerning the circumstances surrounding their complaint) to complete its investigation. Failure by the complainant to cooperate with the investigation may hinder the Applicant's ability to identify potential issues and develop solutions.

Response

After enough information has been obtained to fully understand the nature of the complaint, the Applicant will work with appropriate personnel and/or parties to determine the root cause and the conditions that initiated the complaint. As applicable, the Applicant will develop a resolution to address the complaint.

The Applicant will keep necessary and appropriate communication with the complainant regarding the status of the investigation and actions taken to remedy the source of the complaint. The Applicant will follow up with complainants after a reasonable time has passed to ensure that the complaint was indeed resolved and that the issue causing the complaint has been addressed.

In the event that the identified problem is not resolved within 30 days, the complaint will be reported to the Office of Renewable Energy Siting (ORES) and the New York State Department of Public Service (NYSDPS). If a complaint is not resolved within 60 days, the Applicant may propose more formal options for resolution, such as non-binding mediation with a mutually acceptable mediator, assuming the complainant and nature of complaint are amenable to resolution.

Some complaints may not be amenable to any resolution—for example, complaints about solar energy generally. While the Applicant will provide a respectful acknowledgement of such complaints, and will document them in its Complaint Tracking Log, further action or resolution simply may not be possible to resolve the complainant's issues.

Tracking/Documentation

The Applicant will maintain a written log of all complaints concerning the Facility during construction and operation, using the Complaint Log Sheet (see Attachment A) and Complaint Tracking Log (see Attachment B). The Complaint Log Sheet contains basic information about the complaint (name of complainant, date complaint received, nature of complaint, results of investigation, plans for resolution, follow-up with complainant), and copies of any supporting documentation assembled. Annual reports (at least) of complaint resolution tracking will be provided to ORES and NYSDPS staff and filed with the Executive Director of ORES and Secretary of the NYSDPS. All completed Complaint Log Sheets will be kept as Appendices to the Complaint Tracking Log.

The Applicant will provide a copy of these protocols to the Town of Ripley. In the event that the Town of Ripley or ORES receive complaints directly about unanticipated effects of Facility construction or operation, the Town or ORES should notify the Applicant as soon as practicable and provide the details of such complaint in writing. The Town, ORES, and the Applicant will designate appropriate officials for such communications. The Applicant will then investigate the complaint as outlined above.

4.0 Attachment A: Complaint Log Sheet

Facility Personnel receiving the Complaint:				
Method of Receiving Complaint (circle one):	Phone	Email	Mail	Other (describe)
<i>If other (describe):</i>				
Date Complaint Received (MM/DD/YY):				
Time Complaint Received:				

Complaint Information

Name of Complainant:					
Address of Complainant:					
Phone Number of Complainant:					
Email of Complainant:					
Date/Time of Event:					
Type of Activity (Circle One):	Noise	Visual	Traffic	Safety	Other(describe)
Nature of Complaint (describe in detail):					

Resolution and Follow-up

Definition of problem after investigation by Facility personnel:	
Description of corrective measures taken:	
Date corrective measure(s) completed:	
Date first communication sent to complainant:	(copy attached)
Date second communication sent to complainant:	(copy attached)
Follow-up actions if correctives measure(s) unsuccessful or unavailable:	

This information is certified to be correct: ____

(Attach additional pages and supporting documentation, as required.)

