South Ripley Solar Project
Matter No. 21-00750

Site Security Plan

Supplement

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Table of Contents

List of Appendices

1.0 Purpose

This Site Security Plan will be implemented at the South Ripley Solar Project (Facility) during construction and operation. All security measures outlined will be implemented and adhered to by Facility personnel throughout construction and operation.

The objective of the Plan is to support a safe work environment and protect Facility equipment through implementation of security measures and minimization of unauthorized access to the Facility Site during construction and operation.

All South Ripley Solar Project-affiliated workers—both during construction and operations—will be trained on the Site Security Plan and will be responsible for implementing those aspects of the plan that are applicable to their work. The Site Security Plan will be made available for site employees to review and use.

A copy of the Site Security Plan will be provided to each person on site and will be available at all times for all site personnel to review at the O&M Building.

2.0 Responsibilities

2.1 Project Management

The Project Manager is responsible for:

- Ensuring and verifying compliance of this Site Security Plan with all applicable federal, State and local laws and regulations, as well as Conditions imposed by the Office of Renewable Energy Siting (ORES).

The Site Manager is responsible for:

- Overseeing the implementation of this Site Security Plan;
- Ensuring that Facility personnel receive the appropriate training required by this Site Security Plan;
- Confirming that Facility personnel, including employees, contractors and subcontractors, adhere to this Plan; and
- Documenting and reporting all security incidents to the Project Manager.

2.2 On-Site Employees and Contractors

Employees and contractors are responsible for:

- Adhering to this Plan; and
- Reporting all security incidents immediately to their supervisor and the Site Manager.

2.3 ConnectGen Operations Management and Technical Teams

ConnectGen Operations Management and Technical Teams are responsible for:

- Approving any changes to this Site Security Plan;
- Completing incident investigations and take any necessary steps to address the results of such investigations;
- Supporting the installation of site access controls, such as monitoring and security management systems;
- Supporting upgrades and maintenance as deemed necessary and required by North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) policies and procedures;
- Supporting ongoing compliance evaluations and audits of physical security matters as they relate to the Project;
- Monitoring the assignment of the NERC CIP Senior Manager and advising ConnectGen's senior leadership regarding re-assignment requirements, if necessary, as they relate to the Facility; and
- Monitoring and reviewing the ongoing implementation of the required activities for the Facility to meet CIP requirements.

3.0 Physical Security

3.1 Communications

Cell phone coverage may be limited in the Facility Site, so alternative forms of communication will be needed. Two-way radios will be supplied to employees and contractors, as necessary, and will be capable of:

- Providing immediate emergency communication capabilities to personnel; and
- Notifying personnel of a security incident.

ConnectGen will work with the contractor to develop a program for ensuring proper communications during construction, including identification of procedures and equipment for summoning emergency assistance from State or local authorities. During Facility operation, requests for assistance may be made directly via cell phones or transmitted via two-way radio to the Project Site Manager.

3.2 Safety and Security Measures during Project Construction

To reduce safety and security concerns during construction, public access to the Facility Site will be limited. The contractor may update this Site Security Plan for construction, any updated plan will be provided to the ORES upon completion.

3.2.1 Access Controls

The public will not be allowed on the Facility Site during construction. Access controls to laydown yards and construction areas will include fencing, locking gates, other barriers, and/or signage as appropriate. After construction hours, vehicular access to active portions of the Facility Site will be restricted by parked equipment or temporary fencing. Temporary construction fencing or other visible barriers will be placed around excavations that remain open during non-construction hours. Refer to Exhibit 5: Design Drawings for additional details on fencing and gates.

A log of all personnel visiting, entering, or working on site will be maintained. Visitors will be required to attend the site orientation/safety training and to utilize any personal protective equipment required by the Site Manager.

3.2.2 Electronic Security and Surveillance Facilities

Trespassing is generally not an issue during construction of solar power projects. Therefore, electronic security and surveillance is not currently proposed for the Facility. However, if problems arise, video cameras, on-site security personnel, or other surveillance technology may be utilized to monitor activity during construction.

3.3 Safety and Security Measures during Project Operation

It is anticipated that the Applicant will own and operate the Facility, except for the new POI switchyard connected to the 230kV electric grid which will be owned and operated by National Grid. Therefore, the Applicant will be responsible for safety and security during operation of the Facility, excluding the POI at any Facilities owned by National Grid.

3.3.1 Access Controls

The public will not be allowed on site during Facility operation. Facility equipment, including solar arrays, collection substation, and battery energy storage system (BESS) components, will be enclosed by 7-foot-tall chain-link fencing with barbed wire top line and locking gates to ensure public safety and security of Facility equipment. The collection substation will be surrounded by the same chain-link fencing with an additional 3-strand barbed wire extension at the top of the fencing in accordance with electrical code requirements and industry standards. Refer to the Exhibit 5: Design Drawings for details on fencing and gates. Refer to Appendix 6-B Safety Response Plan for information about access coordination with local first responders.

3.3.1.1 Access Roads

All access roads that are not public shall be gated at solar panel arrays to restrict access to the general public. Gates will be required to be kept locked when maintenance work is not occurring. Signage will be installed on gates warning the public not to trespass. If unauthorized access is found to be a reoccurring problem (i.e., multiple incidents a month) or gates are found to be damaged, intrusion detection devices shall be evaluated for installation at the entrance of Facility access roads. Violations of access road gate locking by subcontractors and visitors may result in them being banned from the Facility Site.

3.3.1.2 O&M Facility

The Operations and Maintenance building (O&M building) will house monitoring systems and workspace for Facility personnel and will be located within the collection substation fence line. The Operations and Maintenance storage facility (O&M storage) will be a storage trailer containing necessary tools and equipment required to conduct routine maintenance on the PV panels, BESS, collection substation, and associated facilities. Both the O&M building and the O&M storage shall be locked at all times when Facility personnel are not inside. A video camera or similar detection device may be installed at the primary entrances of both the O&M building and storage. Should unauthorized access, vandalism, or damage occur to either O&M facility, additional intrusion detection methods may be considered.

3.3.1.3 Solar PV Panels

Solar PV panel systems and equipment access shall be closed by 7-foot-tall chain linked fencing and locked except when they are in the direct control of Facility personnel. Signage will be posted surrounding the perimeter fencing stating it is a federal offense to damage property at a utility-power solar site and stating that no trespassing is allowed on the Facility Site. If vandalism and damage to the solar system becomes a problem, intrusion detection devices shall be evaluated for installation at the solar sites. Violations of solar field equipment access door locking by subcontractors and visitors may result in them being banned from the project.

3.3.1.4 Collection Substation, POI Switchyard, and BESS

The collection substation and the BESS, which will be owned and maintained by ConnectGen, will be fenced in accordance with the applicable regulations and standards. The access gates to these facilities will be locked, and access will be granted only to authorized personnel. Alarm systems and surveillance cameras may be installed; the cameras would be remotely monitored to detect unauthorized access. Emergency responders will be notified in the event of an unauthorized access emergency.

As previously noted, once constructed, the POI switchyard will be owned and operated by National Grid, which will be responsible for implementing necessarily site security measures.

3.3.2 Electronic Security and Surveillance Facilities

The Facility will be remote monitored 24/7 and will have technicians on site during normal business hours. Electronic surveillance is not currently proposed for the Facility. However, if problems arise, video cameras or other surveillance technology may be set up to monitor the facility during operation including at the O&M building, collection substation, BESS facility, and in select PV arrays.

4.0 Security Lighting Information

This Site Security Plan details the anticipated lighting that will be implemented at the South Ripley Solar Project to maintain adequate safety and security during construction and operation of the Facility. More detailed information on the proposed lighting of the Facility is included in the Facility Lighting Plan, please see Appendix 8-B of Exhibit 8. Project lighting was designed to avoid any redundant and ineffective lighting.

The Facility Lighting Plan includes:

- Security lighting needs at collector substation, POI switchyard, BESS, and laydown yard sites.
- Figures demonstrating the lighting area needs and proposed lighting arrangement.
- Detail on how the lighting design will provide safe working conditions at appropriate locations.
- An outline of how lighting has been designed to avoid or minimize off-site light trespass.

4.1 Construction Lighting

The majority of Facility construction will take place during daylight hours and will not require lighting. If lighting is needed for specific construction tasks during normal working hours, temporary lighting will be brought in and will only be utilized during active work periods.

Security lighting associated with construction will potentially include lighting of the staging areas and areas immediately around the office trailers. Lighting will be directed downward where possible to minimize the effects of light pollution and will be reduced to the maximum extent practicable to minimize potential wildlife attraction, but not to the extent that site security would be compromised.

If construction takes place outside of daylight hours, all activities will include the lighting necessary to allow for safe construction activities while at the same time reducing off-site light pollution to the maximum extent practicable. This temporary lighting will be strategically placed to minimize impact but not to extent that site security is compromised. Lights will be turned off when not in use, and only run and lit while crews are on-site.

The Facility Lighting Plan provides more detail on proposed lighting to be used during construction of the Facility.

4.2 Operations Lighting

Permanent security lighting is anticipated to be installed at the collector substation, POI switchyard, and the BESS; no lighting is currently proposed within the solar arrays. Lighting will be installed to provide security, ensure safe entry and exit, and for maintenance purposes. All security lighting will be designed to minimize intensity while meeting required safety standards. Lights will be hooded and angled downward to reduce glare and visibility from a distance and would be turned off when not in use, either manually or by automatic means, as deemed necessary to minimize environmental and community impacts. Security lighting that fails shall be promptly replaced and security lighting functionality testing shall be a component of all maintenance inspections. Additional details regarding Facility inspections will be included in the facility maintenance and management plan.

5.0 Cyber Security

ConnectGen will partner with an industry leader in cyber security that will provide continuous (24 hours/day, 7 days/week, 365 days/year) monitoring and alerting on all servers, workstations, and firewalls in compliance with widely recognized standards within the information technology industry such as the Federal Department of Commerce's National Institute of Standards and Technology and the North American Electric Reliability Corporations (NERC's) Critical Infrastructure Protection (CIP) standards. Cyber monitoring includes all cyber assets at the site and will be subject to an independent periodic audit to ensure compliance with security standards.

Appendix A

Security Plan Acknowledgement Form

I have read the Security Plan for this site and fully understand its contents.

Date	Name	Company