Appendix 6-A: Operations Site Security Plan

Hecate Energy
Cider Solar Farm

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Cider Solar Farm
Towns of Oakfield and Elba
Genesee County, New York

Prepared for:

Hecate Energy Cider Solar LLC

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Abbreviations

AC	alternating current
DC	direct current
HS&E	Health, Safety, and Environmental
kV	kilovolt
LO/TO	lockout/tagout
MW	megawatt
NERC	North American Electric Reliability Corporation
NYCRR	New York Codes, Rules, and Regulations
NYPA	New York Power Authority
NYS	New York State
O&M	operations & maintenance
PV	photovoltaic
SCADA	supervisory control and data acquisition
SSP	Site Security Plan

Glossary of Terms

Applicant	Hecate Energy Cider Solar LLC
Project	Refers to the proposed Cider Solar Farm, an up to 500-megawatt utility scale solar project that will be comprised of photovoltaic panels, inverters, access driveways, electrical collection lines, point of interconnection/substation, construction staging areas, fencing and plantings, located on private land in the towns of Elba and Oakfield, Genesee County, New York.
Project Area	Refers to the Project Site and surrounding/adjacent land totaling approximately 7,518 acres.
Project Footprint	Refers to the limit of temporary and permanent disturbance within the Project Site caused by the construction and operation of all components of the Project totaling approximately 2,452 acres.
Project Site	Refers to those privately owned parcels under option to lease, purchase, easement or other real property interests with the Applicant in which all Project components will be sited totaling approximately 4,650 acres.

1.0 INTRODUCTION

The Hecate Cider Solar Energy LLC (Hecate Energy) Cider Solar Farm involves the construction, operation, and maintenance of an up to 500-megawatt (MW) alternating current (AC) photovoltaic (PV) solar energy generation project (the Project). The Project will interconnect to the New York Power Authority (NYPA) Dysinger – New Rochester 345-kilovolt (kV) transmission line to deliver power to the New York State (NYS) electricity grid. It is anticipated that the Project will be constructed between 2022 and 2023, with a planned Commercial Operation Date of December 31, 2023.

The Project Area includes approximately 7,518 acres and is located north-centrally within Genesee County, approximately 5 miles north of the City of Batavia. It is roughly bound by County Route 9/Albion Road to the west, Miller Road and vacant land to the east. Lockport Road bisects the Project Area from east to west, while State Route 98 traverses the eastern portion of the Project. The Project Area is located to the north of the Villages of Oakfield and Elba.

The Project components will be located on approximately 4,650 acres of leased private land in the towns of Elba and Oakfield, Genesee County, New York (Project Site). The total Project Footprint, which includes both temporary and permanent disturbance is 2,452 acres, or approximately 53% of the Project Site. The Project is located in an area generally characterized by active agriculture and rural residential land interspersed with sparsely forested areas/hedgerows with level to rolling topography.

The purpose of this Operations Site Security Plan (Operations SSP) is to support a safe work environment by implementing security measures and minimizing unauthorized access to the Project during operations and maintenance. The Operations and Maintenance (O&M) Service Provider will adopt this Operations SSP and update it accordingly to fit into its own, company-specific plan.

2.0 SCOPE, ROLES, AND RESPONSIBILITIES

This Operations SSP covers the requirements for site security and public safety during the O&M phase of the Project. All site access will be controlled by the O&M Service Provider.

The Project will normally be unstaffed during operations and will be remotely monitored and controlled by the O&M Service Provider. On-site Project activity will consist of regular inspections as well as planned and unplanned maintenance of the Project systems. On-site activity may include periodic mowing, vegetation management, maintenance of stormwater control features, and inspections of site equipment, trackers, wiring, and other equipment. The on-site work will typically involve small crews of 1 to 5 staff and occasionally larger teams up to about 15 staff.

Table 1: *Roles and Responsibilities* represents a general overview of the responsibilities of Project Personnel for developing and implementing the Operations SSP.

Table 1: Roles and Responsibilities

Role	Responsibility
Site Manager (O&M Service Provider)	• Ensure and verify compliance with the Operations SSP. • Ensure and verify compliance with applicable federal, State, and local laws, regulations, standards, and guidelines. • Ensure Project Personnel receive appropriate training required for the planned work. • Review and approve updates to the Operations SSP.
Asset Manager (Applicant)	• Oversee and coordinate with the O&M Service Provider.
Health, Safety and Environment Manager (O&M Service Provider)	• Ensure Operations SSP consistency with Project Health and Safety Plan. • Assign on-site Heath, Safety and Environmental (HS&E) responsibilities as needed.
On-Site Crew Leaders (O&M Service Provider)	• Ensure on-site workers are registered for access, and familiar with the site security, safety, and emergency plans. • Ensure all workers exit the site upon completing work, and that the site is secured.
Project Personnel (O&M Service Provider's employees and subcontractors)	• Comply with site security, safety, and emergency plans. • Report all security incidents to supervisors or the Site Manager.

Security violations and breaches will be reported to the Site Manager and the Asset Manager. The Site Manager will assess each case and, if appropriate, consult with the local police.

3.0 SITE SECURITY MEASURES

3.1 COMMUNICATIONS

Communications with Project Personnel will be critical to ensuring a secure work environment during the operation and maintenance of the Project. The following communications protocols will be followed by all Project Personnel:

- Most personnel working at the Project will carry a cell phone. Phones should be in audible ring mode.
- If on-site work involves multiple staff or crews working in different areas of the Project Site, then each team leader should carry a two-way radio and/or phone to quickly coordinate activity and respond to emergencies as needed.
- 911 can be dialed from personal cell phones.

The O&M Service Provider should ensure effective communications during on-site O&M activities, including procedures for summoning emergency assistance from state or local first responders. A list of the applicable public safety response agencies is appended to this Operations SSP and will be posted at the Project Site.

In cases of security breaches, theft, or criminal activity that requires support of outside services, the Site Manager may contact local police. The Site Manager will generate incident reports and maintain a file of any police reports that are generated.

3.2 O&M SITE ACCESS CONTROLS

During operations, the Project Site will typically be un-manned, unless on-site work is underway, and will be remotely monitored and controlled.

The Project perimeter fencing and gates will be maintained to restrict unauthorized access. On-site access roads will only be accessible after passing through the secured gates at the main and alternate entrances to the Project. All traffic will primarily flow through the main site entrances.

The public will not be allowed into the Project Site without authorization. All personnel visiting the Project should be approved by the O&M Service Provider's Site Manager and will be documented via site access forms.

Signs will be placed at the entrance gates and periodically along the perimeter fencing to warn against unauthorized entry. The signs will indicate Project contact phone numbers for questions or to report suspicious activity.

All Project Personnel and visitors requiring unescorted entry must be familiar with site security and safety requirements. Visitors entering the main work areas will be escorted unless specifically authorized by the Site Manager.

Project Personnel will be encouraged to look out for and report any signs of unauthorized entry, fence line breaches, damage to assets, or other anomalous conditions. On-site Crew Leaders should tour the active work areas each day during the maintenance work to check perimeter security measures. Any fence breaches must be reported to the Site Manager and be repaired promptly.

3.3 ELECTRONIC SECURITY AND SURVEILLANCE

Electronic security and surveillance are not proposed for the Project. The O&M Service Provider will periodically evaluate security conditions and consider further security measures, such as video surveillance or motion detection cameras as necessary, to monitor activity in key storage areas and areas that require heightened security due to the location of certain Project components.

3.4 SECURITY LIGHTING

During normal operations, most of the Project will not be lit during nighttime hours. There may be a streetlight or manually operated security lighting system installed at the main entrances, within the substation and the switchyard, and at material storage areas if further security is needed. Lighting near the perimeter and near off-site receptors will be directed downward and directed toward interior of site to minimize the effects of offsite light pollution. If additional security is deemed necessary, photocell activated lights and infrared security cameras may be installed at storage areas and key perimeter risk areas.

On-site O&M work activity will generally be limited to daylight hours. In the rare cases when nighttime O&M work is required, work lights will be used in only those work areas and be directed downward and away from off-site receptors, to the maximum extent possible. Work area lights will be shutdown at night unless required for security purposes.

3.5 LIGHTING FOR AIRCRAFT SAFETY

Lighting for aircraft safety is not required for the Project pursuant to Federal Aviation Administration regulations. As the Project does not involve components greater than 200 feet in height, the Project will not compromise aircraft safety. Solar glare exposure to airports within the vicinity of the Project Area, the closest being Genesee County Airport approximately 2 miles south, will be avoided or minimized in accordance with the Visual Impacts Minimization and Mitigation Plan conducted for the Project. The Visual Impacts Minimization and Mitigation Plan includes an analysis of solar glare exposure to airports, structures, and major roadways within the Project Area.

3.6 SETBACK CONSIDERATIONS

The Project Site is located in a rural area with a limited number of nearby residences. Most work activity will occur within the Project Site. The typical activity near the perimeter of the Project Site will be vehicle movements. The O&M Service Provider will establish a safe vehicle speed limit for on-site movement. Permanent fencing will be setback at least 15 feet from roads, and Project components will be setback a minimum of 100 feet from property lines, as indicated in the civil design site plans provided in Exhibit 5: *Design Drawings* of the Application filed in accordance with Chapter XVIII, Title 19 of New York Codes, Rules, and Regulations (NYCRR) Part 900, consistent with the applicable substantive requirements of local law.

3.7 OTHER ACCESS CONTROL MEASURES

Other site access control measures will be incorporated by the O&M Service Provider, including:

- Lockout / Tagout (LO/TO) Procedures: LO/TO refers to specific practices and procedures designed to safeguard employees against the possibility of unexpected start-up or energization of machinery and equipment. A LO/TO procedure will be used during the construction and operation phase of the Project, which covers the possibility of hazards encountered during that phase of the Project.

- Crane and Hoist Safety: When lifting equipment, work crews will ensure only authorized personnel are in the risk zone surrounding the O&M machinery. Work that is conducted in the proximity of electrical transmission lines that are not de-energized will be required to adhere to the required utility safety measures.

- Electrical Hazards: During the O&M phase, all of the Project arrays will be electrically in service, and therefore only authorized personnel will be allowed physical access to the area covered by the arrays.

4.0 INFORMATION AND CYBER SECURITY

4.1 INFORMATION SECURITY

During operations, information systems will be secured using industry standard access restriction protocols as required by 19 NYCRR § 900-2.7(b)(5), including but not limited to North American Electric Reliability Corporation (NERC) reliability standards.

4.2 CYBER SECURITY

The administration of the data acquisition and supervisory control and data acquisition (SCADA) system will comply with NERC reliability standards applicable to the Project. Physical access to critical cyber infrastructure areas will be restricted to those individuals who must have access, as determined by the Site Manager. Access rights will be periodically reviewed and modified, as appropriate, by the Site Manager. When feasible, access into cyber-secured restricted areas will be controlled by the Site Manager (or designee).

An independent auditor will periodically review and validate compliance with applicable security standards, as required by 19 NYCRR § 900-2.7(b)(5).

4.3 STEPS TO CYBER SECURITY

Establishing and maintaining adequate cyber security is a priority for the Asset Manager and the O&M Service Provider. The following steps will be adopted in complying with applicable cyber security standards.

4.3.1 Network Security

Computer networks at the Project Site will be considered critical infrastructure. These networks will be protected from malicious attack by defending the network perimeter, for example, through the use of firewalls and related technologies. A log of known unauthorized access attempts will be kept and the Project's defensive response will be regularly reviewed to evaluate effectiveness. Audits will be undertaken to validate the measures outlined in this Operations SSP.

4.3.2 User Education and Awareness

User policies will be provided to all staff working near the Project control systems (including contractors) to ensure that staff follow security policies when accessing the Project's systems and networks. Induction of new staff working on the systems will include training to assist in the detection of anomalous or unauthorized access attempts. Awareness events, highlighting cyber security risks, will be undertaken at regular intervals.

4.3.3 Malware Prevention

Malware is software that has been developed with the intent to cause harm to a computer network, server, or client device. Specific policies will be developed to cope with this threat and defenses will be deployed to counteract it. This will include, but is not limited to, anti-virus software and deployment of firewalls.

4.3.4 Removable Media Controls

Policies will be put in place to control access to all removable media. The default policy will be to require that USB sticks and lock computer cases be lock-outed to prevent unauthorized access. A clean-desk policy will be instituted within the Project control room; no materials will be permitted to be left out or visible when desks are unoccupied.

4.3.5 Secure Configurations

An inventory of assets, software, devices, and networks will be maintained. When the need arises, security patches and updated software will be rolled out to the relevant client and server systems, following local testing to ensure continuity of service. A known secure configuration will be maintained from a baseline build for the server system. Software installation privileges will be disabled for all users, except the Site Manager (or designee). The preference will be for critical updates to occur when Project-related activity will be at a minimum. Vigilance will be maintained at all times, and critical issues will be reviewed immediately.

4.3.6 Management of User Privileges

The number of privileged accounts with super-user access will be strictly limited. All such accounts will be allocated on a strict “need-only” basis. All other users will be provided with accounts with privileges that are appropriate to the user’s specific need. In the event that staff leave the employment of the O&M Service Provider, the relevant user access shall be terminated. User accounts will only be allocated to contractors or consultants that strictly require access and agree to comply with the information and cyber security policies, and will in any case, be subject to termination in the event that any specific risk is identified. Users will be advised that accounts (and associated emails accounts) are subject to monitoring by the O&M Service Provider. Passwords shall be required to be kept securely, reset regularly, and never shared.

4.3.7 Incident Management

The O&M Service Provider will maintain procedures to address cyber security related incidents and necessary responses. These procedures shall include the reporting to the relevant authorities any incidences of attack; and shutting down non-essential equipment / client, server, or network resources, while recognizing that the operation of critical equipment and infrastructure may be contingent on any or all of these actions. Responses may also be tested and audited as an exercise, on a periodic basis, to ensure proper incident management practices are deployed. Learning points from exercises should be

reviewed with the Site Manager and relevant Project staff, as appropriate. Recovery from high impact incidents, such as fire, flooding, and extreme weather events (“disaster recovery”) shall be detailed in this process, and include protection of critical records, data, and information from the effects of such incidents.

4.3.8 Monitoring

Network traffic and system resource usage will be monitored. Periodic reports will be produced enabling relevant staff to determine the overall health and security of the network and interfacing systems. Anomalous activity will be treated as a potential cyber security threat and the appropriate response shall be determined in accordance with this Plan.

4.3.9 Remote, Home and Mobile Working

A remote working access policy will be developed and rolled-out to staff and others with a need to access the Project’s systems and networks remotely. This policy will include limitations on access to records and information when accessing the networks remotely, limitations on the availability on executive remote actions (e.g., shut down / stop / isolate Project or equipment, etc., unless authorized in advance) and implementation of two-factor authentication to enable all remote user access. The use of removable media will be restricted; this policy will also apply to devices that attempt to connect remotely to the Project’s systems. Additionally, a remote session will time out after a specified time of inactivity. Staff requiring remote access will be trained on the security policy.

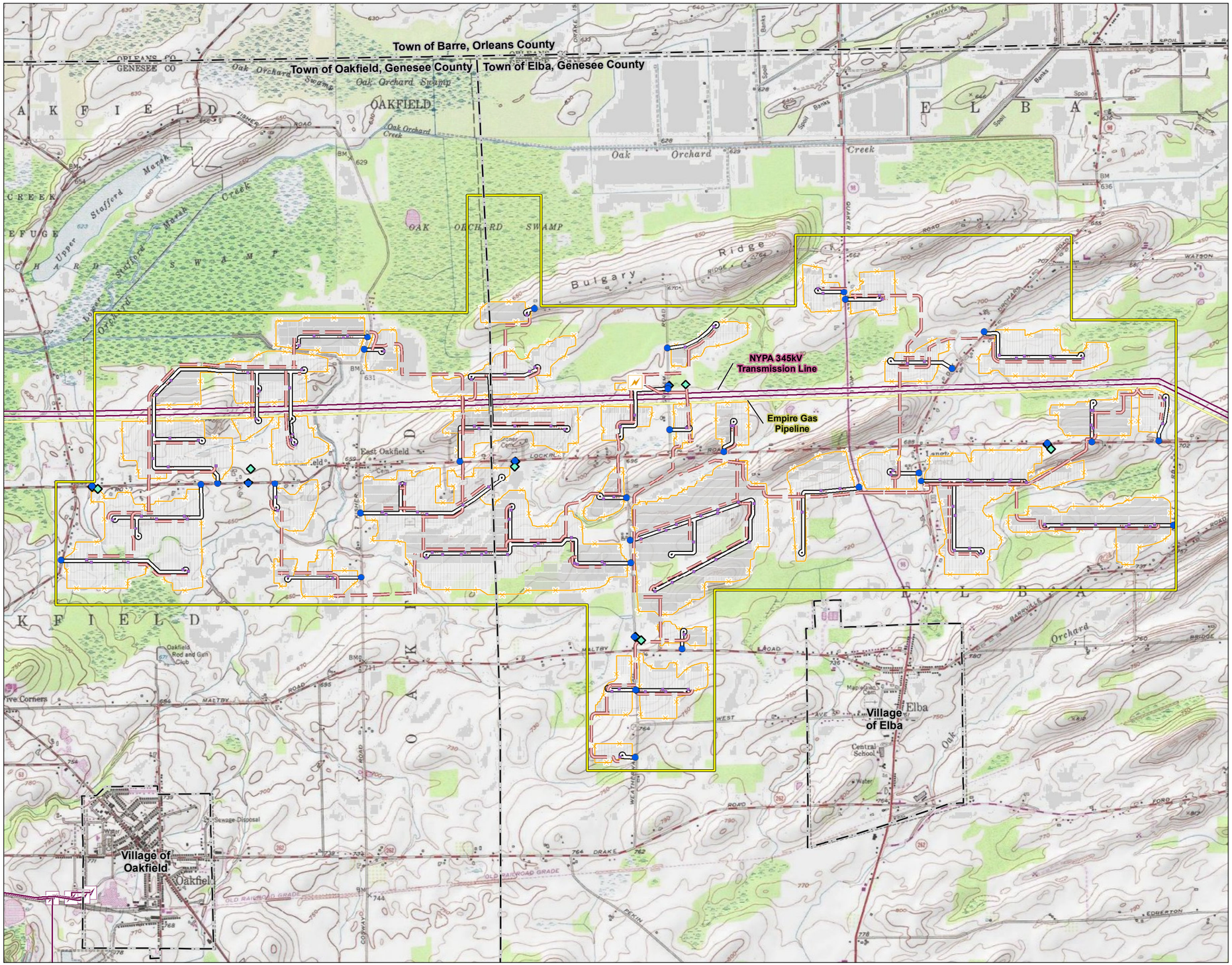
5.0 OPERATIONS SSP TRAINING AND RECORDKEEPING

The Asset Manager and O&M Service Provider personnel working on the Project and the Project control systems will be given a site orientation that includes a review of, and training on, the requirements of this Operations SSP. All personnel visiting the Project Site will be documented via a site access form, and such information shall be archived according to the O&M Service Provider's company policy.

This Operations SSP will be periodically reviewed and updated as necessary based on changing conditions or security events. The Site Manager and Asset Manager will periodically meet to review and approve updates to the Operations SSP.

ATTACHMENTS

Attachment A PROJECT LAYOUT AND LOCATION



Stantec

Legend

- Project Area

Proposed Project

- Substation and Switchyard
- Inverter
- Site Entrance
- Laydown Area
- PV Panel Array
- Collection Line
- Fence Line
- Access Road

Existing Features

- Substation
- NYPA Transmission Line
- Empire Gas Pipeline
- Railroad *
- Municipal Boundary

* There are no Railroads or Switchyards within map extent.

N

0 3,000 6,000 Feet

(At original document size of 11x17)
1:36,000

Notes

1. Coordinate System: NAD 1983 StatePlane New York West FIPS 3103 Feet
2. Data Sources: HIFLD (https://gii.dhs.gov/HIFLD), NYS GIS Clearinghouse (https://gis.ny.gov)
3. Background: Copyright:© 2013 National Geographic Society, i-cubed National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

Project Location
Towns of Elba and Oakfield
Genesee County, NY

Prepared by AS on 2021-03-30
TR by EE on 2021-04-23
IR by NL on 2021-04-23

Client/Project
190502038 REVA

Hecate Energy Cider Solar LLC
Cider Solar Farm

Figure No.
A-1

Title
Project Layout and Location
Map 1 of 1

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Attachment B LIST OF LOCAL PUBLIC SAFETY AGENCIES

GENERAL EMERGENCY	
General Emergency	911
POLICE	
Batavia Police Department 10 West Main Street Batavia, NY 14020	Emergency: 911 Non-Emergency: (585) 345-6350
Genesee County Sheriff's Office 165 Park Road Batavia, NY 14020	Emergency: 911 Non-Emergency: (585) 345-3000
New York State Police Troop A 4525 West Saile Drive Batavia, NY 14020	Emergency: 911 Non-Emergency: (585) 344-6200