ConnectGen Montgomery County LLC

Mill Point Solar I Project

Matter No. 23-00034

SITE SECURITY PLAN

APPENDIX 6-1

TABLE OF CONTENTS

LIST OF ATTACHMENTS

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
NYS	New York State
O&M	operations & maintenance
POI	point of interconnection
PV	photovoltaic
SCADA	supervisory control and data acquisition
SSP	Site Security Plan

1.0 INTRODUCTION

ConnectGen Montgomery County LLC (the Applicant), a subsidiary of ConnectGen LLC (ConnectGen), is proposing to construct and operate a 250-megawatt (MW) alternating current (AC) photovoltaic (PV) solar energy generation facility, referred to as the Mill Point Solar I Project (Facility). The Facility Site is approximately 2,671 acres of leased and/or purchased private land in the Town of Glen, Montgomery County, New York (Facility Site).

The Facility will consist of the following components:

- Arrays of PV panels mounted on single axis tracking or fixed tilt structures;
- Inverters to convert direct current (DC) electricity to AC electricity;
- Electrical collection systems between the panel arrays;
- A new substation;
- A new Point of Interconnection (POI) switchyard;
- A new, overhead 345 kilovolt (kV) generation tie line that will connect the substation to the POI switchyard, and a loop in and out 345 kV transmission connection to the POI switchyard tying the Facility to the New York State utility grid;
- Access roads which will be approximately 20 feet wide;
- Fencing which will be approximately 7 feet high;
- Temporary onsite laydown areas for equipment staging during construction; and
- Operation and Maintenance (O&M) facility.

The Applicant anticipates PV solar modules used in the Facility to be similar to the LONGi LR5-72HBD 540W module with Anti-Reflection Coating. The Applicant proposes to install solar modules on a tracker racking system similar to the NexTracker Horizon – XTR Tracker. Anticipated maximum height of the solar array itself will be approximately 10 feet based on a single portrait panel layout when oriented at maximum height.

The Facility will interconnect to the National Grid 345kV system by looping the existing Marcy – New Scotland 18 line to a new 3 breaker ring Substation in the Town of Glen, New York. This POI will be approximately 50.5 circuit miles east of the Marcy substation.

It is currently anticipated that the Facility will be constructed beginning in 2025 with a proposed In-Service starting in 2026. The Project schedule is subject to change.

The purpose of the Site Security Plan (the “Plan” or SSP) is to support a safe work environment and protect Facility equipment by implementing security measures and minimize unauthorized access to the Facility during construction and operations.

Staff, both during construction and operations, will be trained on the SSP and will be accountable for implementing all aspects of the Plan that are applicable to their work and responsibilities.

The SSP will be reviewed by all employees during new hire orientation required throughout the construction phase. A copy of the SSP will be available for review at the construction trailer during construction and at the O&M Building during operations.

2.0 SCOPE, ROLES, AND RESPONSIBILITIES

This SSP covers the requirements for site security and public safety during the construction and operation phases. Site access will be controlled by the Applicant, the contractor (during construction), and the O&M Service Provider (during operations).

The Facility will be staffed by approximately 3-4 full-time employees during operations and will be remotely monitored and controlled by the O&M Service Provider. Onsite activity will consist of regular inspections as well as planned and unplanned maintenance of the Facility systems. Onsite activity may include periodic mowing, vegetation management, maintenance of stormwater control features, and inspections of site components including trackers, wiring, and other equipment. Onsite work will typically involve small crews of one (1) to five (5) staff and occasionally larger teams.

During construction, an estimated 218 full time employees will be onsite constructing the Facility.

Table 1 represents a general overview of the responsibilities of Staff for developing and implementing the SSP.

Table 1: Roles and Responsibilities

Role	Responsibility
Project Manager Construction: Applicant Construction Manager Operations: Applicant Asset Manager	• Develop and update the SSP. • Ensure and verify compliance of the SSP with all applicable Federal, State, and local laws and regulations, as well as conditions imposed by the Office of Renewable Energy Siting (ORES).
Site Manager Construction: Contractor Superintendent Operations: O&M Provider	• Review, update, and approve SSP. • Oversee the implementation and adherence to the SSP. • Ensure staff receives applicable training. • Communicate with the Applicant, document and report security incidents. • Implement disciplinary action when the SSP is not followed. • Review and update the SSP. • Complete safety inspections. • Provide and distribute PPE. •
Environmental, Health, and Safety (EHS) Manager Construction: Contractor EHS Manager	• Review and update the SSP. • Complete safety inspections. • Provide and distribute PPE. • Conduct SRP training.
Facility Staff Contractor & O&M Service Provider employees and subcontractors	• Be aware of and comply with the SSP. • Complete SSP training. • Act professionally and responsibly during an emergency in accordance with the SSP. • Actively communicate hazards or safety concerns to the Site or EHS Manager.

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

3.0 SITE SECURITY MEASURES

3.1 Communications

Proper communication will be critical to ensuring a secure work environment during construction and operation of the Facility. The following communication protocols will be followed by all Staff:

- Most personnel working at the Facility will carry a cell phone. Phones should be in audible ring mode.
- If onsite work involves multiple staff or crews working in different areas of the Facility 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.

If cell phone coverage is limited at the Facility Site, alternative forms of communication will be employed. Two-way radios will be supplied as necessary and will be capable of providing immediate emergency communication capabilities ford notifying Staff of a security incident.

The contractor and O&M Service Provider will ensure effective communications by creating procedures for summoning emergency assistance from first responders. A list of the applicable public safety response agencies is appended and will be posted at the Facility 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 record of filed police reports. The Site Manager is also responsible for communicating all incidents to the Applicant.

3.2 Site Access Controls

During construction, public access to the Facility Site will be limited to reduce safety and security concerns. The contractor will employ a site entrance security checkpoint for visitors, controlled parking areas, security gates, and secured conex boxes for material storage. The contractor may also employ construction lighting and security patrol if necessary. After construction hours, vehicular access to active portions of the Facility Site will be restricted by parked equipment or temporary fencing. A log of all personnel visiting, entering, or working on site will be maintained. Newly hired staff and visitors will be required to attend the site orientation/safety training and to utilize any personal protective equipment required by the contractor. The contractor may update

the SSP for additional construction requirements. Any updates will be provided to ORES and the Applicant upon completion.

During the operations phase, it is anticipated that the Applicant will own and operate the Facility. Therefore, the Applicant and/or the designated third-party O&M provider will be responsible for safety and security during operation of the Facility. During operations, the Facility Site will employ approximately 3-4 employees staffed at the O&M building for general maintenance activities and will also be remotely monitored and controlled. An O&M building will house monitoring systems and workspace for staff located adjacent to the collection substation. The O&M building shall remain locked when staff is not present.

Perimeter fencing and gates will be maintained to restrict unauthorized access. Facility equipment will be enclosed by 7-foot-tall agricultural fencing and locking gates to ensure public safety and security. The substation will be surrounded by 7-foot-tall chain-link fencing with a 3-strand barbed wire extension at the top in accordance with electrical code requirements and industry standards. Knox boxes will be installed at each entrance gate for emergency responders.

Internal access roads will only be accessible after passing through secured gates at designated entrances. The Facility will host several gates to access the various panel arrays that comprise the Facility. Gates and panel arrays will be named/numbered for distinguishability. Gates will be required to be kept locked when maintenance work is not occurring. Violations of access road gate locking procedures may result in disciplinary action.

In accordance with Sections 5(6)(k-l) in the Town of Glen 2022 Solar Law, signage associated with the Facility will clearly indicate the following information: owner name, GPS/address, contact information, and the party who is responsible for site maintenance. Signage will be greater than or equal to 3 feet by 3 feet in size and posted along major roadways and in a prominent location along tax map parcel boundaries.

Staff will be instructed to identify and report any signs of unauthorized entry, fence line breaches, damage to assets, or other anomalous conditions. Inspections will occur to check perimeter security measures. Any fence breaches must be reported to the Site Manager and repaired promptly. Emergency responders will be notified in the event of an unauthorized access emergency at the substation.

Visitors will not be allowed into the Facility without authorization. All personnel visiting the Facility should be pre-approved by the Site Manager and will sign in and out via the site access form. Unless approved by the Site Manager, visitors will be escorted by site personnel.

3.3 Electronic Security and Surveillance

Electronic security and surveillance are not proposed at the Facility. 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 Facility components.

3.4 Security Lighting

Lighting will be implemented at the Facility to maintain safety and security during construction and operation of the Facility. Facility lighting is designed to avoid any redundant and ineffective lighting.

Construction will mainly take place during daylight hours and will not require lighting. If lighting is needed for specific construction tasks, temporary lighting will be brought in and will only be utilized during active work periods. Security lighting associated with construction may potentially include lighting of the staging areas and areas immediately around 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. If construction takes place outside of daylight hours, 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 avoid redundant and unnecessary impacts. Lights will be turned off when not in use and only utilized while crews are onsite.

During normal operations, most of the Facility will not be lit during nighttime hours, but some lighting will be installed to provide security, ensure safe entry and exit, and for periodic 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, to minimize environmental and community impacts. Security lighting that fails shall be promptly replaced and functionality testing shall be a component of all maintenance inspections.

Lighting systems may be installed at the main entrances, within the substation and the switchyard, and at select material storage areas.

Onsite maintenance activity will generally be limited to daylight hours. In rare cases when nighttime maintenance is required, lighting 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 safety or security purposes. Electricity for the security lights will be provided from the station service power and from a distribution line from the local utility for emergency backup power.

Permanent security lighting is anticipated at the substation and POI switchyard, but no lighting is proposed within the solar arrays.

Relatively little material will be stored onsite during operations. In case valuable materials are stored onsite, the O&M Service Provider may consider additional micro-security features (entry alarms, cameras, etc.) to secure such stored material.

3.5 Lighting for Aircraft Safety

Lighting for aircraft safety is not required pursuant to Federal Aviation Administration (FAA) regulations. As the Facility does not involve components greater than 200 feet in height, the Facility will not compromise aircraft safety. Solar glare exposure to airports within the vicinity of the Facility Site, the closest being the Ranch Airport in Charleston, New York (approximately 3.3 miles south of the Project) and the Fulton County Airport in Johnstown, New York (approximately 4.2 miles north of the Project), will be avoided or minimized in accordance with the Visual Impacts Minimization and Mitigation Plan conducted for the Facility. The Visual Impacts Minimization and Mitigation Plan includes an analysis of solar glare exposure to the Fulton County airport, structures, and major roadways.

4.0 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 Facility and will be subject to an independent periodic audit to ensure compliance with security standards.

5.0 SITE SECURITY PLAN TRAINING AND RECORDKEEPING

The Asset Manager and O&M Service Provider personnel working on the Project and the Facility control systems will be given a site orientation that includes a review of, and training on, the requirements of this SSP. All personnel visiting the Facility 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 SSP will be periodically reviewed and updated by the Site Manager and the Asset Manager as necessary based on changing conditions or security events.

ATTACHMENTS

ATTACHMENT A.
Facility Site Layout and Location

COORDINATE SYSTEM: NAD 1983 STATEPLANE NEW YORK EAST FIPS 3101 FEET; MAP ROTATION: 0
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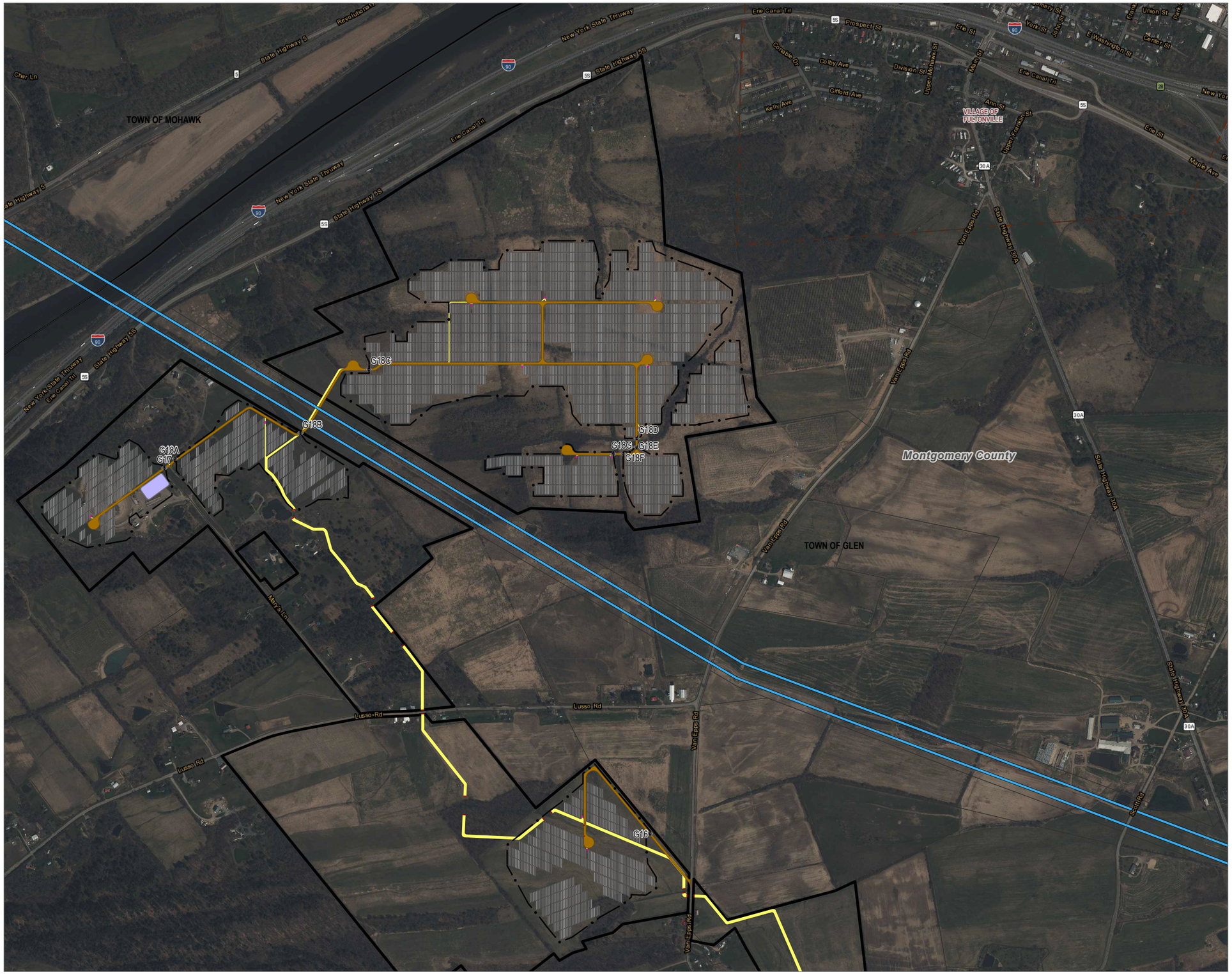
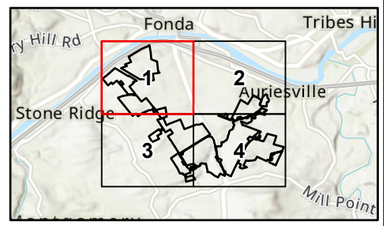


LEGEND

- GATE LOCATION
- EXISTING TRANSMISSION LINE
- OVERHEAD T-LINE
- GENERATION TIE LINE
- PROPOSED FENCE LINE
- ACCESS ROAD
- ARRAY PANELS
- SUBSTATION
- COLLECTION LINE TRENCH
- HDD BORE PITS
- INVERTERS
- POI SWITCHYARD
- LAYDOWN AREA
- FACILITY SITE
- PARCEL BOUNDARY
- VILLAGE BOUNDARY
- TOWN BOUNDARY
- COUNTY BOUNDARY

NOTES:
1. THIS FIGURE IS DESIGNED TO BE VIEWED OR PRINTED IN COLOR AT 11X17.

BASE MAP: NYSGIS "LATEST ORTHOIMAGERY" ONLINE SERVICE LAYER.
DATA SOURCES: TRC, NYSGIS, USGS, ESRI.



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1" = 1,000'

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PROJECT:
CONNECTGEN MONTGOMERY COUNTY LLC
MILL POINT SOLAR I
TOWN OF GLEN, MONTGOMERY COUNTY, NY

TITLE:
PROJECT SITE OVERVIEW

DRAWN BY:	A. KAILAS	PROJ. NO.:	411360.1000.0000
CHECKED BY:	C. PEARCE		
APPROVED BY:	T. KONDAK		ATTACHMENT A MAP 1 OF 4
DATE:	JANUARY 2024		

TRC
3 CORPORATE DRIVE
SUITE 202
CLIFTON PARK, NY 12065
PHONE: 518.348.1190

COORDINATE SYSTEM: NAD 1983 STATEPLANE NEW YORK EAST FIPS 3101 FEET; MAP ROTATION: 0
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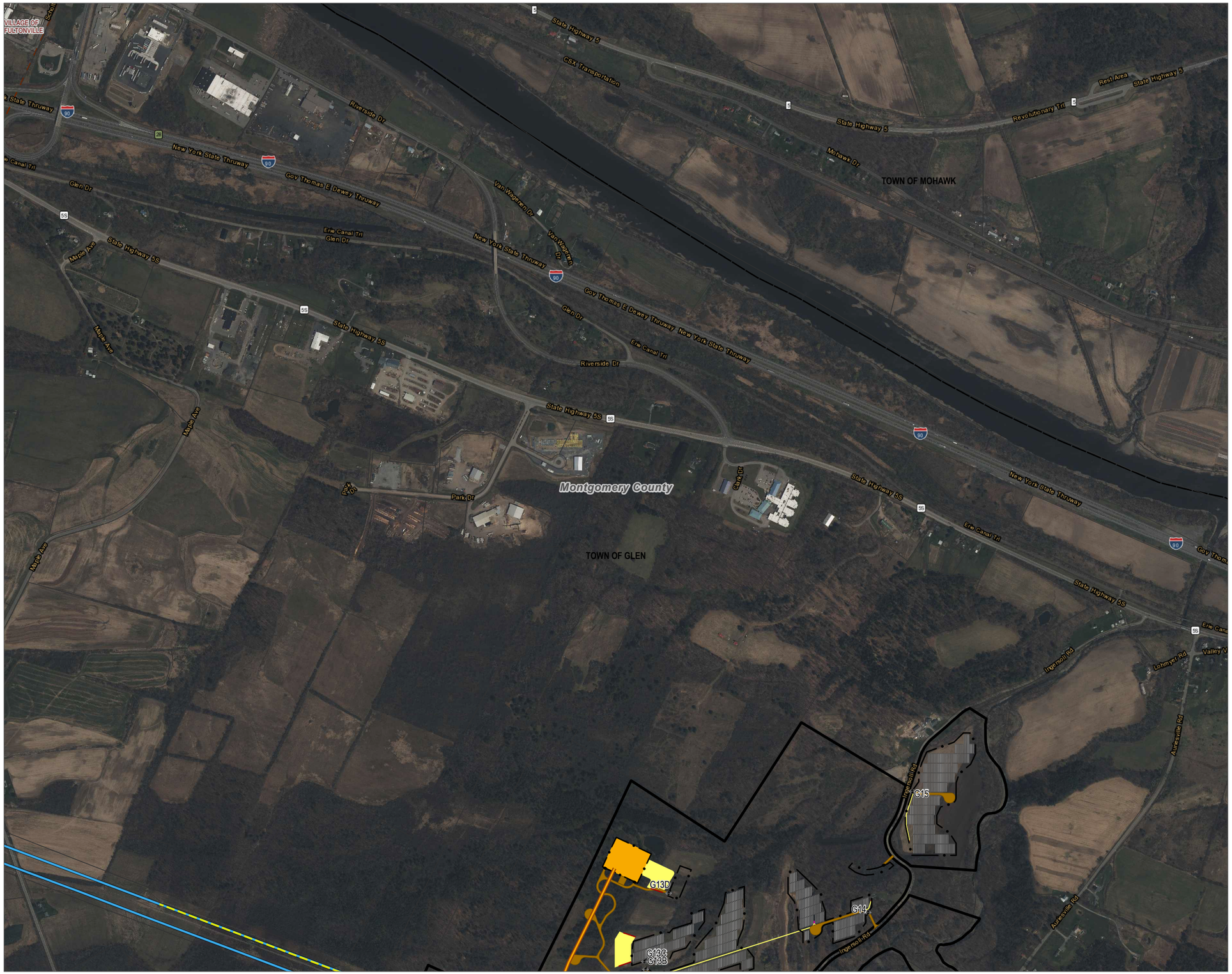

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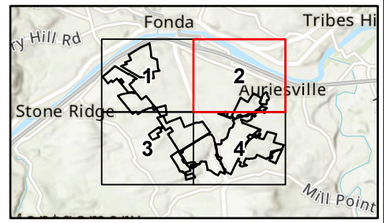

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APPROVED BY:	T. KONDAK		ATTACHMENT A MAP 2 OF 4
DATE:	JANUARY 2024		

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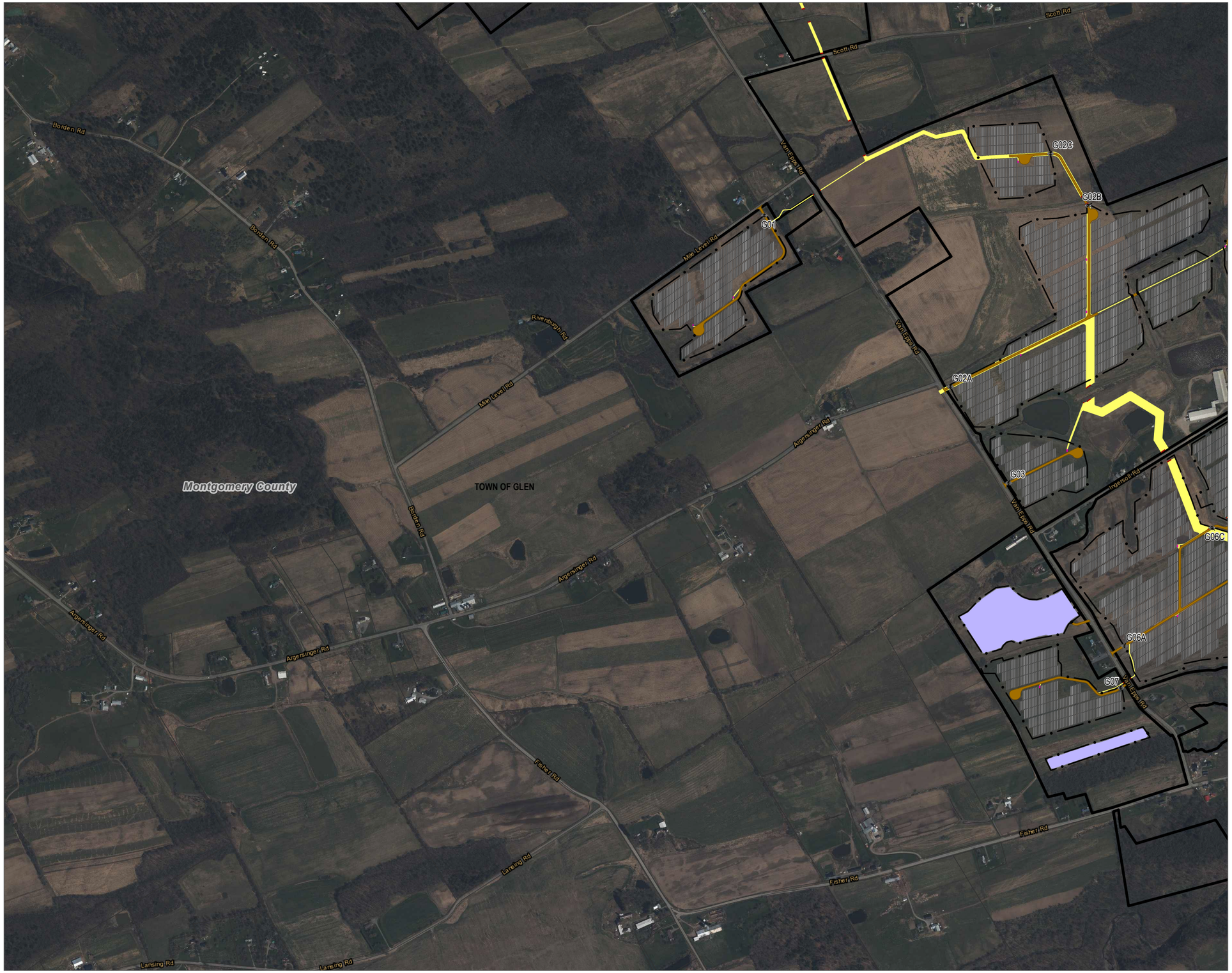

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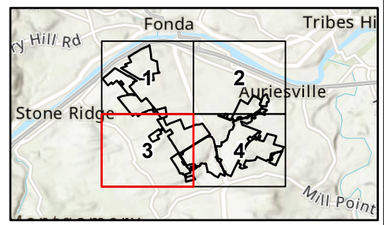

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DRAWN BY:	A. KAILAS	PROJ. NO.:	411360.1000.0000
CHECKED BY:	C. PEARCE		ATTACHMENT A MAP 3 OF 4
APPROVED BY:	T. KONDAK		
DATE:	JANUARY 2024		

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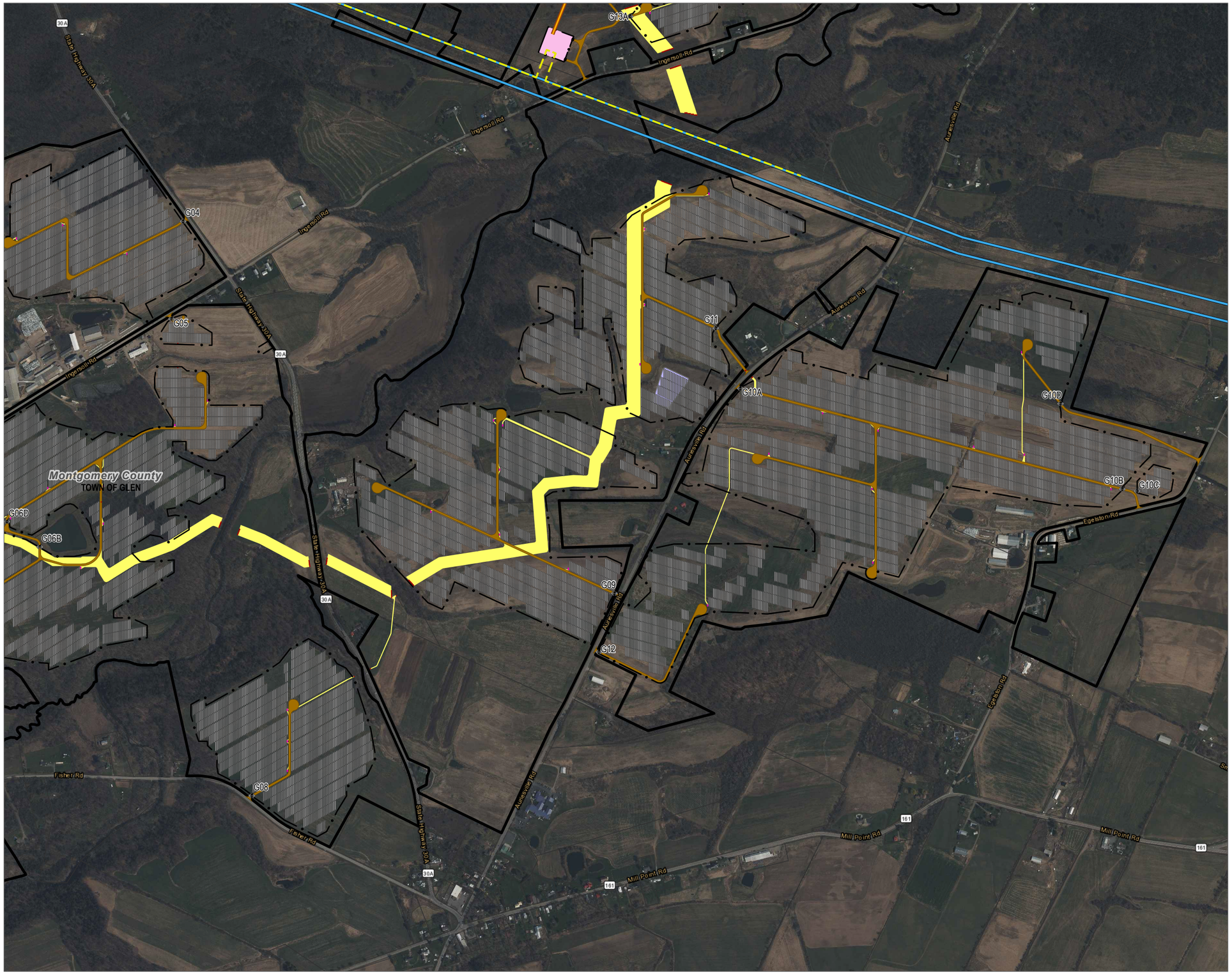

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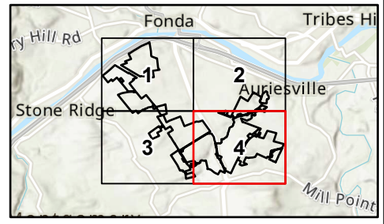

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CHECKED BY:	C. PEARCE		ATTACHMENT A MAP 4 OF 4
APPROVED BY:	T. KONDAK		
DATE:	JANUARY 2024		

TRC
3 CORPORATE DRIVE
SUITE 202
CLIFTON PARK, NY 12065
PHONE: 518.348.1190

ATTACHMENT B.
List of Local Public Safety Agencies

Contact	Phone	Notes
CONTRACTORS AND APPLICANT INFORMATION		
Construction Contractor Name and Address: TBD Site Manager: TBD	Project-specific Toll Free Number: (866) 203-1118	info@millpointsolar.com
Applicant ConnectGen Montgomery County LLC Address: 1001 McKinney St., Suite 700 Houston, Texas 77002 Project Contact: Andrew Barrett	Project-specific Toll Free Number: (866) 203-1118	Project-specific Toll Free Number: (866) 203-1118
O&M Service Provider Name and Address: TBD Remote Operations Center: TBD		
GENERAL EMERGENCY		
General Emergency	911	When calling 911, Mutual Aid applies for dispatch of local fire, police, and EMS.
FIRE		
Glen Volunteer Fire Department 134 Auriesville Road Fultonville, NY 12072	Emergency: 911 Non-Emergency: (518) 922-6422	
Florida Volunteer Fire Department - Station 1 6252 NY-30, Amsterdam, NY 12010	Emergency: 911 Non-Emergency: (518) 843-6286	
Fort Hunter Fire Department 3525 Carman Road Schenectady, NY 12303	Emergency: 911 Non-Emergency: (518) 355-2434	
POLICE		
Montgomery County Sheriff's Office 200 Clark Dr. Fultonville, NY 12072	Emergency: 911 Non-Emergency: (518) 853-5510	
New York State Police Troop G 3003 NY-5S, Fultonville, NY 12072	Emergency: 911 Non-Emergency: (518) 673-5454	

Contact	Phone	Notes
HOSPITAL / MEDICAL		
Ambulance Services	911	
Lake Valley EMS 10 Guy Park Ext Amsterdam, NY 12010	(518) 843-1140	
St. Mary's Healthcare Hospital 427 Guy Park Avenue Amsterdam, NY 12010	(518) 842-1900	
Nathan Littauer Hospital 99 E State Street Gloversville, NY 12078	(518) 725-8621	
SPILL / RELEASE		
National Response Center	Hotline: 1-(800) 424-8802	
New York State Spill Hotline	1-(800) 457-7362	All petroleum spills that occur within NYS must bereported to the NYS Spill Hotline within 2 hours of discovery
New York State EmergencyResponse Commission (SERC)	(518) 292-2366	
New York State Office of Emergency Management David M. De Matteo,Chairman of State Emergency Response Commission Working Group 1220 Washington Avenue, Building 22, Suite 101 Albany, NY 12226-2251		https://www.dhses.ny.gov/state-emergency-response-commission-serc
U.S. Environmental Protection Agency Region 2 Main Regional Office 290 Broadway New York, NY 10007-1866	(877) 251-4575	
NYSDEC Region 4 1130 N. Westcott Road Schenectady, NY 12306	(518) 357-2234	
MUNICIPAL OUTREACH		
Town of Glen 7 Erie Street Glen, NY 12072	(518) 329-1234	
Montgomery County Emergency Management Department – Public Safety Facility 200 Clark Drive	(518) 853-4011	

Contact	Phone	Notes
P.O. Box 338 Fultonville, NY 12072		
OTHER EMERGENCY OFFICES		
New York State Departmentof Health		https://www.health.state.ny.us https://health.ny.gov/contact/doh800.htm
NYS Division of HomelandSecurity and Emergency Services 1220 Washington Avenue State Office Campus, Building 7A, Suite 710 Albany, NY 12226	(518) 242-5000	https://www.dhses.ny.gov/contact-us
New York State EmergencyManagement Office 1220 Washington Avenue Albany NY 12226	(518) 292-2200	https://www.dhses.ny.gov/contact-oem
American Red Cross Eastern New York Region 33 Everett Road Albany, NY 12205	(518) 458-8111	https://www.redcross.org https://www.redcross.org/local/new-york/eastern-new-york.html
UTILITIES		
National Grid	(800) 642-4272	https://www.nationalgridus.com/

ATTACHMENT C.
Acknowledgement Form

ACKNOWLEDGEMENT FORM

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

Date	Name	Company