High Bridge Wind Project
Preliminary Site Security Plan

High Bridge Wind, LLC

2019

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1. Purpose

This Site Security Plan (the "Plan") identifies the site-specific requirements to create and maintain a secure Project Site ("Site")[1] during both construction and operation. The Calpine Physical Security Standard (*See* EHS – 15) ("Calpine Standard Plan") supplements this Plan, and High Bridge Wind, LLC ("High Bridge Wind") must comply both with the requirements in the Calpine Standard Plan and the specific requirements of this Site Security Plan.

The purpose of this Site Security Plan is to support a safe work environment by implementing security measures and minimizing unauthorized access to the Project during construction and operation.

2. Responsibilities

2.1. Project Site Management

The Project Manager is responsible for:

- Ensuring and verifying compliance with all aspects of (1) the Calpine Standard Plan, (2) this Site Security Plan, and (3) all applicable federal, State and local laws and regulations, as well as Certificate Conditions imposed by the Siting Board; and
- Ensuring that Project personnel receive the appropriate training required by this Site Security Plan.

2.2.Employees and Contractors

Employees and contractors are responsible for reporting all security incidents immediately to their supervisor or the Project Manager.

2.3.Corporate Environmental, Health and Safety (EHS) and Security

Calpine Corporate EHS and Security is responsible for approving any changes to this Site Security Plan and any other site-specific physical security requirements.

2.4.Information Technology Services

Calpine Information Technology Services is responsible for:

- Supporting the installation of site access controls, such as monitoring and security management systems; and

[1] Project Site is defined here to include the land owned or leased by High Bridge Wind upon which the Project is located, and all Project components, including access roads, collection lines, turbines, the operation and maintenance (O&M) building, the collection substation, and the point of interconnection (POI) substation. Upon completion, the POI substation will be deeded to NYSEG and High Bridge Wind will no longer be responsible for site security.

- Supporting upgrades and maintenance as deemed necessary and required by North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) policies and procedures.

2.5. Compliance and Legal Department

The Calpine Compliance and Legal Department is responsible for:

- Supporting ongoing compliance evaluations, incident investigations, and audits of physical security matters as they relate to the Project;
- Monitoring the assignment of the NERC CIP Senior Manager and advising Calpine senior leadership regarding re-assignment requirements, if necessary, as they relate to the Project; and
- Monitoring and reviewing the ongoing implementation of the required activities for the Project to meet CIP requirements.

2.6. Regional Vice President

The Regional Vice President is responsible for overseeing implementation of this Site Security Plan.

3. Physical Security

3.1. Communications

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

- Providing immediate emergency instruction to personnel; and
- Notifying proper personnel of a security incident.

Calpine will work with the Engineering, Procurement and Construction (EPC) 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 Project operation, requests for assistance may be made directly via cell phones (assuming that option is available) or transmitted via two-way radio to the Plant Manager.

3.2. Construction Security

To reduce safety and security concerns during construction, public access to the Project will be limited. The contractor will be required to provide a final site security plan for construction, which will be developed by the contractor selected to lead the construction of the Project (i.e., contractor). Preparation of the Final Site Security Plan will begin immediately following selection of the BOP contractor, and the final plan will be provided to the Siting Board upon completion.

3.2.1. Access Controls

The public will not be allowed on the Site during construction. Access will be restricted by locked gates, other barriers, and/or signage as appropriate. After hours, vehicular access to active portions of the Site will be blocked by parked equipment or temporary fencing. Temporary construction fencing or other visible barriers will be placed around excavations that remain open during off hours.

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

3.2.2. Electronic Security and Surveillance Facilities

Trespassing is generally not an issue during construction of wind power projects. Therefore, electronic security and surveillance is not currently proposed for the Site. However, if problems arise, video cameras or other surveillance technology may be set up to monitor activity during construction.

3.2.3. Lighting

See Section 4 for a discussion of preliminary lighting plan information.

3.2.4. Setback Considerations

Project setbacks, in association with the access controls discussed in this section and periodic security measure inspections, should ensure adequate safety and security during construction of the Project.

3.3. Operational Security

It is anticipated that the Applicant will own and operate the Project, except for the POI substation, which will be owned and operated by NYSEG. Therefore, the Applicant will be responsible for safety and security during operation of the Project, excluding the POI substation.

3.3.1. Access Roads

All access roads that are not public will be posted with “No Trespassing” signs to limit and deter public access to the Site and wind turbine locations. High Bridge Wind will install gates with locks at the entrances to access roads if requested/permitted by the underlying landowner under their Lease Agreement. All contractors must inform the Plant Manager of the portion of the Site they intend to visit and the approximate date and time. If unauthorized access and/or vandalism is found to be a problem, intrusion detection devices (e.g., security cameras) and/or additional gates will be installed, as necessary.

3.3.2. O&M Building

The O&M building will be strategically located to allow access to all turbine locations. The building will contain necessary tools and equipment required to conduct routine maintenance on the wind turbines and associated facilities. The O&M building will be fenced and only accessible by using a pre-authorized badge issued by High Bridge Wind, LLC. The building will have surveillance cameras at the gate and building entrance.

The O&M Building will be fenced. Access will be granted only to authorized personnel, who may gain access by badging into the fenced perimeter and O&M building. An alarm system and a surveillance camera will be installed; the camera will be remotely monitored to detect unauthorized access. Emergency responders will be notified in the event of an unauthorized access emergency.

3.3.3. Wind Turbines

The wind turbine access doors will be closed and locked except when employees or contractors are inside the wind turbine. Signs will be posted at every wind turbine location indicating that it is a federal offense to damage wind turbines. “No Trespassing” signs will also be posted to inform people that only authorized access is allowed. If vandalism and trespassing become a problem, intrusion detection devices will be installed, as necessary.

3.3.4. Substations

The collection substation, which will be owned and maintained by High Bridge Wind, will be fenced with an 8-foot fence with three rows of barbed wire on top. The access gate will be locked, and access will be granted only to authorized personnel. An alarm system and a surveillance camera will be installed; the camera will 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 substation will be owned and operated by NYSEG, which will be responsible for implementing necessarily site security measures.

3.3.5. Lighting

See Section 4 for a discussion of preliminary lighting plan information.

3.3.6. Setback Considerations

Project setbacks, in association with the access controls discussed in Section 3.2, the security lighting discussed in Section 4, and periodic inspections of security measures, should ensure adequate safety

and security during operation of the Project.

4. Preliminary Lighting Plan Information

This Preliminary Site Security Plan details the anticipated lighting that will be implemented at the High Bridge Wind Project to maintain adequate security at the facility during construction and operations and to meet FAA general requirements. Preliminary details are currently available for various pieces of equipment; final lighting plan information will be included in a Facility Exterior Lighting Plan, which will be submitted prior to the commencement of construction. The Facility Exterior Lighting Plan will:

- Address security lighting needs during construction;
- Address security lighting needs during operation: at wind turbine sites, collection and POI substation sites, the O&M facility, and the battery location;
- Provide plan and profile figures to demonstrate the lighting area needs and proposed lighting arrangement at the collection and POI substation sites, the O&M building site, and any exterior equipment storage yards, and typical figure(s) for wind turbine sites;
- Demonstrate how the lighting design will provide safe working conditions at appropriate locations. For example, by:
    - Using task lighting, as appropriate, to avoid off-site lighting impacts; task lighting will be designed to be capable of manual or auto-shutoff switch activation rather than motion detection;
    - Requiring permanent exterior lighting, other than turbine door safety lighting, to have full cutoff fixtures, with no drop-down optical elements that spread illumination and create glare; and
- Describe the turbine lighting specifications required to meet the FAA determination requirements.

4.1. Construction Lighting

Security lighting associated with Project construction will 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.

Construction that takes place outside of daylight hours 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 Exterior Lighting Plan, which will be submitted prior to the start of construction, will include final details of construction phase lighting.

4.2. Operations Lighting

Permanent security lighting will be installed at wind turbines bases, substations, O&M facility and the battery location. This lighting will be installed to provide safe entry and exit as well as security. The lights installed will be automatic or manual as deemed necessary to minimize environmental and community impacts. Security lighting that fails shall be promptly replaced and checking security lighting functionality shall be a component of all maintenance inspections of substations and turbines in accordance with the inspection schedule in the O&M Plan.

The Facility Exterior Lighting Plan, which will be submitted prior to the start of construction, will include final design details of the lighting during the operational phase.

4.2.1. Turbine Lighting

Turbine doors will be equipped with lighting to promote security and safe operation. Lighting will be designed in consideration of required ingress and egress during emergency situations. The lighting will be designed to minimize the impact on the environment. Lights will be angled downward to reduce glare and visibility from a distance and will be turned off when not in use, either manually or by automatic means. If maintenance work is required, temporary lighting will be used that will minimize glare in the surrounding areas.

4.2.2. Substation Lighting

POI[2] and collection substation lights will be the lowest intensity required to accomplish their safety purpose. Lights will be hooded and angled downward to reduce glare and visibility from a distance and will be turned off when not in use, either manually or by automatic means, as deemed necessary to minimize impacts. Preliminary lighting plan information for the substations is included in sheets HBW-E-110-06 and HBW-E-111-05 of the Electrical Detail Drawings (Appendix 05-B of the High Bridge Wind Project Article 10 Application). The lighting was designed to avoid any redundant and ineffective lighting. Any modifications to the preliminary lighting plan information will be submitted in the Facility Exterior Lighting Plan prior to the start of construction.

4.2.3. O&M Facility Lighting

The O&M facility will be equipped with lighting to promote security and safe operation. Lighting will

[2] To the extent that NYSEG's requirements for the POI substation differ from those described here, NYSEG's requirements will be used, and those changes reflected in the Facility Exterior Lighting Plan.

be designed in consideration of required ingress and egress during emergency situations. The lighting on this and all buildings will also be designed to minimize the impact on the environment. Lights will be hooded and angled downward to reduce glare and visibility from a distance and will be turned off when not in use, either manually or by automatic means. The lights will be the lowest intensity required to maintain safe operation.

4.2.4. Battery Lighting

The battery will be equipped with lighting to promote safe operation. The lights will be designed to minimize impact to the environment. Lights will be hooded and angled downward to reduce glare and visibility from a distance and will be turned off when not in use, either manually or by automatic means. As applicable, final design requirements will be included in the Facility Exterior Lighting Plan submitted prior to the start of construction.

4.3. Aircraft Safety Lighting

Aircraft safety lighting of turbines and meteorological towers must comply with Federal Aviation Administration (FAA) regulations and follow specific design guidelines to reduce collision risk.[3] Aircraft safety lights on turbines must conform to FAA's December 4, 2015 Advisory Circular 70/7460-1L or as updated, specifically Chapter 13 (Marking and Lighting Wind Turbines), which requires the use of FAA L-864 aviation lights.

The aircraft safety lighting design outlined in the Facility Exterior Lighting Plan will ultimately be approved by the FAA to ensure aircraft safety.

5. Information and Cyber Security

5.1. Information Security

All confidential Project information will be handled in accordance with the Calpine Information and Technology Services Information Protection and Handling Standard. Information systems will be secured using industry standard access restriction protocols.

5.2. Cyber Security

High Bridge Wind will comply with all North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) standards. These mandatory Reliability Standards include CIP Standards 002 through 011, which address the security of cyber assets essential to the reliable operation of the electric grid. Physical access to critical cyber infrastructure areas will be restricted to those individuals who must have access. Where feasible, access into cyber secured restricted areas will be monitored by

[3] The Project will comply with the requirements imposed by the FAA. This preliminary Site Security Plan will be revised, as necessary to conform to any terms and conditions imposed by the FAA.

personnel or video surveillance. Periodic validation of compliance with the applicable standards by an independent auditor will be carried out as required by 16 NYCRR § 1001.18(b)(6).

In addition, High Bridge Wind will implement several policies that address strong password encryption, two-factor authentication, an incident response plan and playbook, as well as off-site storage of log files and backup of critical assets.

6. Response to Security Incidents

Procedures for responding to security-related incidents/emergencies are included in the High Bridge Wind Emergency Action Plan (EAP). These incidents include, but are not limited to:

- Suspicious persons/trespassers;
- Bomb/terrorist threats;
- Active shooter situations or other violence; and
- Vandalism/sabotage.

7. Inspections and Recordkeeping

7.1. Security Compliance Checklist

The Site EHS Specialist will be responsible for completing a Security Plan Compliance Checklist at least once annually. The EHS Specialist will ensure that any corrective actions required are promptly completed and the resolution of the corrective actions is documented. In addition, inspections will be conducted periodically during Project construction and operation to ensure that site security measures are being properly implemented.

7.2.Document Retention

To ensure that the appropriate site security measures are applied and maintained to protect project personnel, property, and equipment, the site will maintain this plan for as long as it's in effect. In addition, a Security Plan Compliance Checklist will be maintained. This checklist will contain details regarding compliance with the major plan components and the past two checklists will be retained.

8. Education and Training

All High Bridge Wind-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.

High Bridge Wind will engage all site employees with ongoing cybersecurity awareness training and testing on an annual basis.

9. Updates to the Site Security Plan

This Site Security Plan will be reviewed annually and updated as necessary. The Plant Manager or the O&M Manager will determine who reviews the Plan.