

Site Security Plan

Number Three Wind

Case 16-F-0328

Lewis County, New York

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PURPOSE

The Number Three Wind LLC (NTW or Company) Site Security Plan (Plan) outlines the approach for site security at the NTW Project (Project) located in Lewis County, New York. The Project is operated by NTW's affiliate, Invenergy Services LLC (Invenergy). This Plan is a 'live' document and will be updated as necessary to reflect the prevalent status of the operations and modifications to strategy or organization. The Plan is consistent with specifications outlined in the Certificate of Environmental Compatibility and Public Need, With Conditions (Certificate) (issued November 12, 2019) pursuant to Public Service Law § 168. It is the policy of NTW to conduct security activities in a manner consistent with Corporate Vision, Mission, Values, and Strategic Principles by evaluating site-specific security risks to maintain a secure working environment and establish proactive, cost-effective programs to mitigate those risks.

OBJECTIVES

The Plan goals are the following:

- To identify potential security risks that could affect project activities under each NTW entity scope.
- To measure the impact of potential risks on NTW activities.
- To establish required protection levels for each affected entity and set the rules for personnel at site and during their assignments.
- To provide guidelines for the project, to protect against and mitigate risks that could threaten Invenergy employees, assets and materials, communities, company reputation and global operations.

It is not an objective of this Plan to reduce or change criminal patterns in the region of the Project.

APPROACH

The approach for this Plan will be framed by Invenergy's security principles. Mitigation and avoidance of risks will be the main focus of the Plan. Implementation of security measures will consider its potential effects on local communities and other stakeholders, such as authorities and, if applicable, customer representatives.

Measures included in this Plan will be aimed at providing a secure work environment that is suited to local conditions and social factors, minimizing conflict with the community, and focusing on security protection. Invenergy will work with local law enforcement officials to prevent trespassing.

PROTECTED ASSETS

The following types of assets will be considered under this Plan:

4.1 Personnel: Referring to authorized people working at the Project site, that can belong to any of the following collectives:

- Invenergy's employees: Invenergy's personnel working in the Project or visiting the Project in order to support any activities or operations.

- Contractors: Personnel of companies hired by Invenergy for specific works at the site either in a sporadic, temporary, or permanent manner.
- Visitors: Personnel who do not carry out any kind of work at the Project site but who are visiting the site or meeting personnel in the premises.

4.2 Physical Assets: Referring to wind turbine and components, materials, facilities and buildings, properties, and land where the Project is built.

4.3 Information: Referring to any of the following:

- Any kind of information used during the Project in any kind of physical or electronic format.
- Information systems.

REFERENCES


This document was prepared in accordance with the Certificate, Appendix A(25) and using Certificate, Appendix B, Part 16.b as guidance, and in accordance with the *Invenergy Security Principles, Framework and Planning Procedure*; the *Physical Security Considerations for Installation in Existing and New Construction*, *Cybersecurity Policies*, and the *Business Conduct Guidelines*.

PROCEDURE

This section presents the various risk factors and threats that may affect both Project assets and staff, as well as highlighting known or foreseeable direct threats to the Project or Project activities.

1.1 Project Description

Description										
Project Name	Number Three Wind									
Site Mgr.	Luke Thisse									
Facility type (select applicable)	Corp Office		Temp Office		Camp		Residence		Warehouse	
	Thermal		Wind	X	Solar		Storage		Other	
Client (if any)	Contract		MW	105.8	Turbines	+27	Panels		Area	
NTP	N/A									
COD	Q3 2023									
ETA (main assets)	N/A									
Location	Country		USA			State/Province		New York		
	County		Lewis			Municipality		Lowville & Harrisburg		
	Address									
Demographic information	Population		~ 27,000 (County)			Unemployment		~ 5.2%		
		0-18 years:	~ 29%		Poverty rate		~ 11.4%			

Description					
	Age Breakdown	19-64 years:	~ 51%	Ethnic groups	White-95.8%, Hispanic-1.7%, 2 or more-1.3%, Other-1.2%
		65+ years:	~ 20%	Main languages	English
Surroundings description	Coordinates	Latitude	43.49.25 N (O&M Building)		
		Longitude	75.32.39 W		
	Hospitals	Lewis County General Hospital - 7785 N State St, Lowville, NY 13367			
	Police	Lewis County Sheriff Office - 5252 Outer Stowe Street, Lowville, NY 13367			
	Number Three Wind is located in Lewis County, New York a few miles NW of the town of Lowville. The Project site is located on the Tug Hill Plateau and generally consists of woodlands. There are some paved roads in the area, but most are gravel and seasonally maintained roads.				
					
<div>Project Layout</div> <div>Number Three Wind Farm Lewis County, New York Article 10 Case Number 16-F-0328</div> <div>Rev. 02 November 11, 2020 Invenenergy</div>					

1.2 Security Risk Assessment

1.2.1 Introduction

The rate of violent crime is much lower than the average US county. Lewis County is in the 99th percentile for safety, meaning 1% of counties are safer and 99% of counties are more dangerous. The rate of violent crime in Lewis County is 0.73 per 1,000 residents during a standard year. People who live in Lewis County generally consider the east part of the county to be the safest for this type of crime. The chance of being a victim of violent crime in Lewis County may be as high as 1 in 1,036 in the southwest neighborhoods, or as low as 1 in 1,970 in the east part of the county.

1.2.2 Risk Identification and Assessment

From Appendix 1 – Security Risk Assessment Matrix

Risk	Risk Score*
Armed Intruder/Active Shooter	5
Bomb Threat	3
Burglary/Intrusion	6
Contraband	6
Driving hazards (off-site)	8
Homicide	4
Kidnap for Ransom	4
Labor/Community Activism	3
Robbery (armed or un-armed)	4
Supply Chain Security	3
Terrorism	5
Vandalism / Sabotage	6
Workplace Violence	4
Physical Assault	4

(*) Risk Score [1-3 (**Very Low**), 4-8 (**Low**), 9-12 (**Medium**), 13-24 (**High**) and 25 (**Extreme**)] is calculated based on the Likelihood vs Impact Matrix, Probability and Impact shall be graded on a scale from 1 – 5 with 1 being lowest. Risk Score that applies is considered before the implementation of the security measures.

1.2.3 Direct Threats Related to the Project

None

1.2.4 Direct Vulnerabilities Associated with the Project

- Wind farms are set up in open spaces where access cannot be restricted completely; they will always be accessible to landowners or others
- Formal access roads and their control does not prevent access from to the Project site
- Project site is basically comprised of flatlands and there are no elements in the terrain that prevent or hinder access to the project site
- Proximity to roads makes it easier for people to go to the Project site
- Road infrastructures make it easier for people to get close to the Project site. This facilitates the perpetration of antisocial actions
- Operations and night-time movements pose a risk due to the state of the communication routes and the actions of common criminals
- Criminal actions occur at night and often on roads and highways
- A malpractice perpetrated by any person involved or related to the project can potentially negatively affect Project personnel or the Project itself
- Restricted logistic routes or areas must be identified for all involved within the country (transport of people and transport of components)

1.3 On-Site Security Measures

1.3.1 Personnel Security

The main premise of the Project Site Security Plan is to ensure the security of the personnel involved in the Project. In view of the variety of risks identified in the previous section, the following measures will be implemented.

1.3.2 Training

Employees shall be oriented to applicable Invenergy policies and plans including Site Orientation, Emergency Response Plan, Security Awareness. Site Management shall provide training to support their job function.

1.3.3 Commuting and traveling in/around or to/from Project site

See Appendix 4 – Journey Management & Travel Security

1.3.4 Private Security *[NOT applicable but maintained in case of escalation of the current threat level]*

This section summarizes the functions and requirements for companies providing surveillance services within the security scope of Invenergy.

Surveillance involved in the provision of services shall fulfill the following requirements:

- Licensed in the State of New York.
- Have training procedures for personnel to be incorporated into the project.
- Avoid unjustified changes in rotations that are not communicated to the Client.
- Local experience.
- Correct application of hiring procedures and subsequent billing.
- Communication, coordination and monitoring mechanisms, using control panels with indicators and metrics agreed by both parties that allow at all times to monitor the quality of security protection service provision.
- Surveillance resources will be used to control assets at the site and guarantee security in the areas where these assets are collected, in addition to patrolling the project's roads to detect and prevent antisocial acts.

NOTE: In any case, contracting a security service provider shall be conducted under the direction of Invenergy Security.

1.3.5 Law Enforcement:

Law enforcement officers (LEOs) may be utilized for special event security, employment termination assistance, strikes, workplace violence events, extreme weather, traffic control, or as required based on a risk assessment.

- Officers may provide services for events in their government issued uniform or in plain clothes depending on the type of event and the needs of the Company.
- Uniformed LEOs acting under their official capacity as peace officers shall not be utilized for pre-planned controlled substance searches at any Company location.
- LEOs acting in an off-duty capacity and under a third-party agency are permitted to be used for controlled substance searches.

- All law enforcement services shall be engaged through the use of a third-party agency that specializes in off-duty LEO services. Invenergy shall not directly engage law enforcement agencies for officer services.
- All off duty officers providing services to the Company are required to meet the state and local requirements for off duty officers in the area in which they are providing services and be permitted to work in an off-duty capacity.
- Every effort shall be made by the third-party agency to schedule local LEOs who are familiar with the area and local crime. In the event of an emergency when local LE is unavailable, non-local LEOs may be utilized.

NOTE: In any case, contracting off-duty LEOs shall be conducted under the direction of Invenergy Security.

1.3.6 Perimeter and Access Roads

Limited perimeter control measures can be implemented due to the vast area that the Project covers and the limited effectiveness of such measures in such an area. The O&M office building, temporary storage, and other Project areas such as laydown yards, should be grouped in a single fenced and controlled location. The O&M Building is surrounded by 6-foot-tall chain link fence without barbed wire, due to the absence of any energized equipment. The Weller Substation is surrounded by 7-foot-tall chain link fence with three strands of barbed wire measuring 12" in additional height. *See Appendix 8 – Site Plans for drawings of fenced areas and motorized gate location and to Appendix 9 – Fencing Details for specifications on the perimeter fence at the O&M Building and Weller Substation.*

- Two gates will be installed located at the access road to turbines 34 and 40 (T-34, T-40) (*See Appendix 10 – NTW Gate Map*). These gates shall be kept locked when turbine maintenance is not being conducted.
- Signs shall be posted on turbine access roads indicating private property no trespassing. (*See Appendix 6 – Sample Security Signage*)

1.3.7 Tool Containers

Tool containers are vulnerable and common target of theft. The following measures should be implemented to prevent and deter theft:

- Use of full metal containers only
- Use of weather assistant anti-vandal security locks
- Permanent patrol by project personnel
- Accurate inventory control of materials and tools stored

1.3.8 Wind Turbines

Wind turbine access doors shall be closed and locked except when Project personnel are inside the turbine. If vandalism and damage to wind turbines becomes a problem, intrusion detection devices shall be evaluated for installation at wind turbine sites. Violations of turbine access door locking by subcontractors and visitors may result in them being banned from the Project. A key control policy will be implemented by NTW and used by all personnel and contractors.

1.3.9 Substations

All Project substations shall be fenced. Control buildings within the substation and the fence door shall be kept locked unless Project personnel are inside the substation. Access to the control house shall be controlled and monitored through the use of an electronic access system. The substation shall have an alarm system and/or video recording system in place to deter intruders to the control house. Should vandalism or damage occur to the Project substations, additional intrusion detection methods may be considered. Violations of substation locking by subcontractors and visitors may result in them being banned from the Project. Signs will be posted on all sides of the substation fence stating only authorized personnel allowed inside

1.3.10 O&M Building

The Operations and Maintenance Building ("O&M building") shall be locked at all times when Project personnel are not inside. Access shall be controlled and monitored through the use of an electronic access system. Should unauthorized access, vandalism, or damage occur to the O&M building, additional intrusion detection methods may be considered.

1.3.11 Access Control to controlled areas

The following shall be kept in a log:

- Access control for personnel:
 - Register all data regarding people/vehicles entering the site in the access log
 - Where appropriate, inspections will be done on:
 - People
 - Objects
 - Vehicles
 - Access authorization or refusal
- Access control of vehicles and materials:
 - Identification of vehicles, drivers, and other occupants
 - Data registration
 - Vehicle and cargo credentials
 - Vehicle inspection
 - Access authorization or refusal
- Access rules for Project personnel:
 - All employees must wear company issued badges
 - Badges shall be worn in a visible manner to others while in the Project areas
 - No access to the site under the influence of drugs, narcotics, or alcohol
 - No alcohol, drugs, or controlled substances
 - Personnel suspected of being under the influence may be required to be tested
 - No weapons are allowed on any NTW site, see Appendix 5 – Workplace Violence for further clarification
 - Access to restricted areas by unauthorized personnel will be reported to Project management
 - All personnel entering the site should report to the O&M building
 - Any person and vehicle entering are subject to random inspection

1.3.12 Lighting

Security lighting is an important component of the security plan. Security lighting shall be installed at the substation and the O&M building in accordance with the Project's lighting plan. Security lighting that fails shall be promptly replaced and checking security lighting functionality shall be a component of all maintenance inspections of substations.

- Turbine lighting: Select turbines shall be outfitted with FAA lighting on the nacelle roofs to alert aircraft to the location of the Project per the Project's lighting plan. Turbines at this site do not have exterior door lighting.
- Substation lighting: Substation lights shall be kept to the minimum necessary for security and maintenance safety and installed per the Project's lighting plan.
- O&M Building lighting: O&M building external lights may be set on a motion detector and will be hooded downward. If motion detector lighting is not feasible, the light will be placed on an auto-off switch in which the light will automatically turn off after a specified period of time (i.e., period of time needed to accomplish any nighttime safety or maintenance work). The light will be of the lowest intensity required to accomplish its safety purpose. Interior lighting shall be motion activated.

1.3.13 Cranes and major equipment

The protection of any cranes and major equipment, when present on the Project site, will be critical, because their damage can cause delays or stops to Project activity. Crane usage is mainly limited to construction of the Project, however there may be times the cranes used are for scheduled maintenance. Cranes will be monitored outside working hours or when there is no activity in the platform area where they are parked.

1.4 Cyber Security

The North American Electric Reliability Corporation (NERC) defines a cyber security incident as "a malicious act or suspicious event that:

- Compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter; or
- Disrupts, or was an attempt to disrupt, the operation of a bulk electric system cyber system."

The following sections broadly identify the measures NTW has taken to avoid cyber security incidents at the Project.

1.4.1 POI Switchyard Security

National Grid will manage SCADA and cyber security of the point of interconnection (POI) Switchyard. As part of the NYISO interconnection process, NTW anticipates that National Grid will require NTW to design and install this system. The POI Switchyard and its SCADA system will need to comply with National Grid requirements and presumably NERC requirements. In general, these cover operational status and control of critical equipment while meeting associated cyber security requirements.

1.4.2 Cyber Securities for Project Facilities

NTW will install and manage the SCADA system for monitoring and controlling the Project Substation and wind turbines from the O&M building. The SCADA system will be built and maintained to comply with NERC requirements for critical infrastructure protection (CIP). Per these requirements, NTW will maintain firewalls at the Project Substation and at the O&M Building that will control and monitor inbound and outbound

communications traffic. An independent reviewer will verify that the system is properly functioning every three years.

INCIDENT REPORTING

All security incidents will be reported as soon as possible to the site manager and security. Please refer to Appendix 2 – Reportable Incidents, for further guidance. Consider the following when reporting a security incident:

Guideline for Notifying Security Incidents	
Who is reporting?	<i>[Name, Phone number, email]</i>
What has happened?	<i>[Incident, for example, a theft, a sabotage, name of victim...]</i>
Where has it happened?	<i>[Country, city, NTW site]</i>
When has it happened?	<i>[Date and time]</i>
How has it happened?	<i>[Brief description of facts]</i>
Which actions have been initiated?	<i>Immediate actions as first response</i>
Have been the authorities or any external services been notified? <i>(if it applies)</i>	<i>[Police, Ambulance, Fire Brigade, Insurance...]</i>
Is the situation under immediate control (Yes /No)?	<i>[Yes /No]</i>
Assistance required?	<i>Yes /No/What is the support required</i>

Some incidents may require contacting the local police, ambulance, or fire department. Contact information is provided in Section 8 – Emergency Contacts; or for a detailed emergency contact list, see the Project Emergency Response Plan.

NTW is committed to implementing a culture of a positive work environment where all grievances are dealt with fairly. NTW has a commitment to expedite any inquiry into allegations of abuse, use-of-force, or wrongdoing, independently of the origin of said claims:

- Reception of complaints
A space in the office compound will be available to present any grievances, whether these are related to the security measures or presented by the local communities, either informally (verbally) or formally (in writing).
- Assessing
The supervisor/site manager, with the support of the NTW Security, will then make an evaluation and investigation of the complaint.
- Monitoring

The site manager and those involved, including public security forces, if necessary, will closely monitor the situation to avoid any future tensions or problems regarding the presented grievance or any other issue that may arise.

EMERGENCY CONTACTS

The following table includes contact information for pertinent authorities, hospitals, fire department, key project personnel, key business partners, and other relevant contacts. This table will be updated with additional contact information gathered during the Project Security Assessment, and as necessary, throughout Project operations.

Agency	POC	Phone	Address
Lewis County Sheriff Office		(315) 896-8500	5252 Outer Stowe St., Lowville, NY 13367
Lowville Fire Department		(518) 873-6777	5420 The Parkway, Lowville, NY 13367
Lewis County General Hospital		(315) 376-5200	785 N State St, Lowville, NY 13367
<i>Add as applicable</i>			

All communications relating to any issue affecting the security of the project, its industrial neighbors or nearby communities will be made immediately to the most senior person on site to NTW Security and to other pertinent agencies in the chart, above. **If it is a life-threatening situation, contact emergency services (911) prior to contacting project management.**

NOTE: Please refer to the Emergency Response Plan for a detailed contact list.

UNMANNED AERIAL VEHICLES (UAVS/DRONES)

There may be occasions when the Project site will employ UAV technology for purposes of monitoring progress or inspection of work. However, unknown devices can pose both a security and safety threat. The operation of these devices is closely regulated by the federal agency responsible for drone safety, the Federal Aviation Administration (FAA). In addition, NY State has several supplemental laws and rules specific to NY State drone operations.

The usage of UAVs for authorized purposes will be allowed after appropriate notification and authorization from the Site Manager (See Appendix 7 – 24 Hour Advance Notice of Unmanned Aerial System (UAS) Operation).

APPENDICES

Appendix 1 – Security Risk Assessment Matrix

SRAM		Likelihood				
		1	2	3	4	5
Impact		5%	6%-35%	36%-65%	66%-95%	96%-100%
		Rare	Unlikely	Possible	Likely	Almost Certain
5	Extreme	S1, S11				
4	Major	S6, S7				
3	Moderate	S2, S8, S10				
2	Minor		S9, S13, S14	S3, S4, S12	S5	
1	Insignificant					

Risk	Description	Likelihood	Impact	Risk Score*
S1	Armed Intruder/Active Shooter	1	5	5
S2	Bomb Threat	1	3	3
S3	Burglary/Intrusion	3	2	6
S4	Contraband	3	2	6
S5	Driving hazards (off-site)	4	2	8
S6	Homicide	1	4	4
S7	Kidnap for Ransom	1	4	4
S8	Labor/Community Activism	1	3	3
S9	Robbery (armed or un-armed)	2	2	4
S10	Supply Chain Security	1	3	3
S11	Terrorism	1	5	5
S12	Vandalism / Sabotage	3	2	6
S13	Workplace Violence	2	2	4
S14	Physical Assault	2	2	4

(*) **Risk Score** [1-3 (**Very Low**), 4-8 (**Low**), 9-12 (**Medium**), 13-24 (**High**) and 25 (**Extreme**)] is calculated based on the Likelihood vs Impact Matrix. Probability and Impact shall be graded on a scale from 1 – 5 with 1 being lowest. Risk Score that applies is considered **before** the implementation of the security measures. After the security measures to modify impact or likelihood of occurrence, which are a requirement to ensure the security of assets and personnel, are implemented, the overall risk score shall decrease.

Category	Term	Definition
Severity		
25	Extreme	Highest priority. Try to avoid risk. Constant monitoring by senior leadership.
13-24	High	Priority for risk mitigation. Constant monitoring by senior staff.
9-12	Medium	Priority of risk mitigation measures. Daily monitoring by field supervision.
4-8	Low	Basic mitigation measures adequate. Monitored daily by operational staff
1-3	Very Low	No additional mitigation measures required. Normal controls adequate.
Likelihood		
1	Rare	Risk will occur only under most unusual circumstances
2	Unlikely	Risk not expected to occur under most circumstances
3	Possible	Risk occurs under certain circumstances and conditions
4	Likely	Expect risk to occur
5	Almost Certain	Risk will occur
Impact		
1	Insignificant	Insignificant injuries, health effects, delay/interruptions, business cost (<\$5,000); no reputational exposure & fully reversible impact
2	Minor	Minimal injuries, health effects, delays/interruptions (1 day), business costs (<\$15,000), moderate reputational exposure & mostly reversible impact
3	Moderate	Moderate injuries, health effects, delays/interruptions (1-2 days), business costs (<\$50,000), moderate reputational exposure, outside assistance required to contain risk, partly reversible impact
4	Major	Permanent disability or multiple hospitalizations, major health effects, major business cost (\$50,000 - \$150,000), major delays/disruptions (3-6 days), major reputational exposure, outside assistance required to contain risk, some irreversible impact
5	Extreme	Fatalities, multiple hospitalizations/ disability, substantial business cost (>\$150,000), significant delays/disruption (>6days), major reputational exposure, outside assistance required to contain risk, significant irreversible impact

Appendix 2 – Reportable Incidents

Reportable Event	Definition	Recipient(s) of Report
Breach/ Attempted Unauthorized Access of Site	The unauthorized attempt to enter, or actually entering, the nonpublic areas of the site. Nonpublic areas are all those to which access is controlled. This may occur during business or non-business hours.	Invenergy security, Project leadership and if appropriate, local law enforcement, federal law enforcement & Invenergy External Affairs.
Theft/Diversion	The unauthorized removal or diversion of items or materials from site to include losses from personal vehicles or of sensitive items such as ID badges, technology, radios, documents, or uniforms.	Invenergy security and Project leadership. If appropriate, local law enforcement & federal law enforcement.
Sabotage/ Tampering/ Vandalism	Damaging, manipulating, defacing, or destroying part of a site facility, computer systems, site infrastructure or other aspects of the site in order to cause harm or disruption.	Invenergy security and Project leadership. If appropriate, local law enforcement, federal law enforcement & Invenergy External Affairs.
Expressed or Implied Threat	Communicating a spoken or written threat to commit a crime that will result in death or bodily injury to another person or persons or to damage or compromise a facility or infrastructure at the site.	Invenergy security and Project leadership. If appropriate, local law enforcement, federal law enforcement & Invenergy External Affairs.
Misrepresentation	Presenting false information or misusing documents, and/or other identification to misrepresent one's association, relationship, or affiliation with the job site in an attempt to gain access to the job site.	NTW Security, Project leadership, and Invenergy External Affairs. If appropriate local & federal law enforcement.
Battery	The use of force against another, resulting in harmful, offensive, or sexual contact or any unlawful and or unwanted touching of a person of another by the aggressor, or by a substance put in motion by him or her.	Invenergy security and Project leadership. If appropriate, Invenergy External Affairs local law enforcement & federal law enforcement.

Reportable Event	Definition	Recipient(s) of Report
Arrest	The lawful taking, seizing or detention of a site employee into custody by law enforcement personnel from site.	Invenergy security, Project leadership. If appropriate, federal law enforcement & Invenergy External Affairs.
Demonstrations/Protests	A peaceful demonstration of 10 or more participants outside the restricted area of the job site that may elicit media attention or pose potential safety concerns for arriving or departing employees, customers, contractors, etc.	Invenergy security, Invenergy External Affairs, and Project leadership. If appropriate, local law enforcement and/or federal law enforcement.
Hostile Act	Similar to a demonstration but participants undertake hostile activities that could result in damage, injury or loss to job site employees or facilities.	Invenergy security, Invenergy External Affairs, Project leadership & local law enforcement. If appropriate, federal law enforcement.
Media Event	Any event that results in expressed interest by the media.	Invenergy Security, External Affairs, Project leadership, & if appropriate, federal law enforcement.
On-Site Arrest	The lawful taking, seizing or detention of a non-employee by law enforcement personnel on job site property not accessible to the general public.	Invenergy security, External Affairs, Project leadership and local law enforcement. If appropriate, federal law enforcement.
Suspicious Activity	The demonstration of unusual or prolonged interest in the job site facilities beyond a mere casual or professional interest by an individual or individuals. Taking of photos or video of the job site facilities in a surreptitious or unusual manner.	Invenergy security, Project leadership, if appropriate, Invenergy External Affairs and local law enforcement or federal law enforcement.
Unmanned Aerial Vehicle (UAV) Activity	Any unauthorized UAV/s or "drones" observed in flight over the site or within 100 feet of the perimeter.	Invenergy security, Project leadership, if appropriate, local and/or federal law enforcement
Elicitation	The solicitation of information at a level beyond mere curiosity about specific job site operations, procedures, and security processes in a manner that would arouse suspicion of criminal or terrorist activity.	Invenergy security, External Affairs, Project Leadership, and if appropriate, local law enforcement & federal law enforcement.

Reportable Event	Definition	Recipient(s) of Report
Loss	The inadvertent loss by employees of sensitive job site supplies, tools, or materials such as identification badge, computer, 2-way radio, vehicle pass, proprietary materials, or any other items identifiable as associated with the site.	Invenergy security and Project leadership. If appropriate, local and/or federal law enforcement.
Weapon Possession	The unauthorized transport, possession, or brandishing of a firearm on site property, were prohibited to the extent of the law.	Invenergy security, Project leadership, if appropriate, local and/or federal law enforcement & Invenergy External Affairs.

Appendix 3 – Bomb Threat

Please Refer to the Emergency Response Plan Section 9.1 and Attachments.

Appendix 4 – Journey Management & Travel Security

The Journey Management Procedure is intended to ensure the safety of personnel while traveling in the Project region either using NTW or rental/leased vehicles and can be applied as needed while commuting to/from work. These guidelines highlight the requirement for effective communications and outline the procedures should an incident occur.

Scope

The scope of this document is to provide a comprehensive guide on journey management procedures, which will be applied in conjunction with/in addition to the terms and conditions of NTW Travel Policies. This Journey Management Plan provides a means to capture and consolidate the relevant information of all personnel employed by Invenergy and contractors.

Communications

NTW employees shall communicate on a regular basis with their line manager or nominated designee so that their respective locations are known.

Route/Area Familiarization

Personnel shall become familiar with the area and know which places can be considered safe or otherwise. They should avoid high-risk areas and find out about security related day-to-day circumstances. Changing levels of threats will be identified by security and site management. Traffic information can be consulted at 511NY (<https://www.511ny.org/> or via twitter @511NY).

Travel Security

The risk to staff travelling to the NTW Project Site is assessed as LOW.

Travel Phases

Prior to departure

- a) Traveler will require the following:
 - Confirmation of transportation service or vehicle rental.
 - Confirmation of a hotel or guest house reservation (only company approved hotels shall be used).
 - Provide a trusted party with contact information.
- b) Get acquainted with the general security situation in the area.

Transportation throughout the stay

- a) Lodging:
 - Travelers are required to book only at NTW approved hotels.
- b) Ground transportation:
 - Employees are allowed to use rental or personal vehicles.
 - Personnel is authorized to ride in taxi cabs, including platforms such as Lyft or Uber.

- c) Driving at night through unfamiliar rural areas should be avoided.

Post Travel

- Invenergy's personnel shall report any incidents to their supervisor or security.

Standard Safety & Security Precautions

Driver Responsibilities

- Drive safely, according to NYSDOT regulations, and the policies in this document.
- Do not exceed the speed limit.
- Drive politely and in a way that will not compromise the image of NTW or Invenergy in the eyes of other road users and pedestrians.
- Maintain doors and windows locked.
- Ensure seat belts are always worn by ALL passengers.
- Ensure that copies of the vehicle documents and permits are up to date, valid and are in the vehicle glove compartment before moving the vehicle.
- **Do not** drive under the influence of alcohol or drugs.
- Avoid using your mobile phone while driving.
- If you receive an SMS security alert, observe the instructions therein.
- Remain vigilant. Avoidance is paramount, if you spot suspicious activity ahead, such as large crowds, roadblocks etc., turn around, get out of the area and report.
- If you suspect that you are being followed, head immediately for the nearest safe haven location (e.g., Police Station, Hospital, company project site etc.).
- Do not leave personal belongings (e.g., laptop-, handbags) exposed in the car.

Passenger Responsibilities:

- Always check that the doors and windows are locked.
- Always wear seat belts, both in the front and back of the vehicle.
- Have a means of communication available.
- Do not be afraid to exercise control on the driver's speed.
- Do not encourage driver to misuse one-way streets
- Do not leave personal belongings (e.g., laptop-, handbags) exposed in the car.

Personal Security – Journeys

- Avoid routine, vehicles, times, routes, as much as possible.
- Call ahead to destination with Estimated Time of Arrival (ETA).
- Drive at a steady speed – periodically check mirrors and surroundings.
- Don't get boxed in – when stopped be able to see the wheels of the car in front at all times.
- Be watchful when stopped in traffic.
- Cover valuable items and place on floor.
- Report progress on long journeys – stay in touch!
- Be prepared to drive past if suspicious of activity at destination.
- Park in secure area or in full public view.

Immediate Actions on Accidents & Incidents

- All road traffic accidents, no matter how minor must be reported in person or by telephone as soon as practicably possible. Verbally with a follow-up written report.
- All security incidents must be reported in person or by telephone to security, including:
 - Suspicious behavior or activity threats
 - Extortion
 - Theft
 - Attack/assault
 - Vandalism

NOTE: Any deviation from these guidelines will be consider a security violation and will be subject to disciplinary action; the responsibility and costs will be on the individual.

Appendix 5 – Workplace Violence

NTW is committed to preventing Workplace Violence and to maintaining a safe working environment.

Workplace Violence includes but is not limited to the following actions that occur on-site or in connection with work activities: oral, written or electronic abuse or intimidation; indirect or direct threats to an individual, his or her family, associates or property with physical harm or otherwise engaging in behavior that creates a reasonable fear of such harm; physically assault upon oneself or another person; intentionally destroying or threatening to destroy company property; and stalking; physically aggressive acts (such as shaking fists, kicking, pounding on desks, punching walls, screaming at others, angrily jumping up and down, throwing things); or using company resources to threaten, frighten, stalk or harass someone.

All employees, contractors, or vendors shall immediately report violations or suspected or potential violations to HR, Security, or their immediate supervisor. All violations will be subject to disciplinary action up to and including termination.

POTENTIAL VIOLENCE ASSESSMENT MATRIX		
Level	Description	Action
Potential Threat	Individual remarks were misinterpreted, taken out of context, or were unsubstantiated, with no evidence of wrongdoing	<ul style="list-style-type: none"> Document incident Contact Human Resources or Corporate Security
Implied Threat	Individual makes a veiled threatening statement, or shows obsessive interest in violent incidents, firearms, or other weapons	<ul style="list-style-type: none"> Document incident Contact Human Resources or Corporate Security who will contact appropriate other team members Continue to monitor the situation
Specific Verbal Threat	Individual makes a direct but isolated threat, e.g. "I'll kill you." "I'm going to shoot_____." "I'm going to blow this place up."	<ul style="list-style-type: none"> Isolate affected individual(s) Document incident Contact Human Resources or Corporate Security who will contact other team members Continue to monitor the situation
Ongoing Specific Threat	Individual continues to interrupt the work environment with threatening statements and/or intimidating behavior, threatening gestures or statements, e.g. "It won't be long before I take a gun to you people."	<ul style="list-style-type: none"> Isolate affected Individual(s) Document incident Contact Corporate Security, Human Resources, and/or Senior site Management
Imminent Danger	Individual behavior is out of control, may be brandishing a firearm or other weapon, and may be destructive to property and/or endangering others.	<p>Take immediate preventative action to avoid harm to individual or others. Appropriate action may include:</p> <ul style="list-style-type: none"> Notify Law enforcement Secure work premises Contact Corporate Security or Human Resources.

Weapons

Privately owned firearms and offensive weapons are not to be taken into the Project site or other related Project facility. Weapons include objects or items that by design, manufacture or use can serve as a lethal or deadly instrument, regardless of whether possession of the item is legal or illegal.

Examples of weapons include, but are not limited to:

1. Firearms (real and replica)
2. Zip, air, pellet, and paint guns
3. Ammunition except for those properly permitted and required on a Company site (contact security)
4. Explosives and fireworks except for those properly permitted and required on site (contact security)
5. Incendiary devices
6. Hoax bombs (e.g., any device that reasonably appears to be an explosive or incendiary device that by design may cause alarm or emergency response - does not include such devices when authorized for training purposes)
7. Switchblade knives, or knives (real or replica) with blades in excess those defined as legal by the appropriate state law(s)
8. Daggers, swords, spears, or hand instrument designed to cut or stab another by being thrown
9. Crossbows, bows & arrows, or similar devices
10. Clubs, nun-chucks, nightsticks, blackjacks, and bats
11. Brass knuckles or similar devices
12. Stun guns, electroshock weapons and similar devices
13. Any other disabling substance

Anyone found in possession of such materials will be removed from site, subject to disciplinary action up to and including termination and if necessary, referred to appropriate law enforcement jurisdiction for further action.

Armed Intruder/Active Shooter

In an active shooter situation, employees should:

- Quickly determine what actions to take to protect life: options include run, hide, and fight (described below). Use best judgement based on the specific circumstances of the incident. Getting away from the shooter(s) is the top priority. Call 911 when in safe location and warn/prevent individuals from entering an area where an active shooter may be possible.
- **Run**
If there is an accessible escape path, attempt to evacuate the premises. Be sure to:
 - Have an escape route and plan in mind.
 - Evacuate regardless of whether others agree to follow.
 - Leave your belongings behind.
 - Help others escape, if possible.
 - Prevent individuals from entering an area where the active shooter may be.
 - Keep your hands visible.
 - Follow the instructions of any police officers.
 - Do not attempt to move wounded people.
 - Call 911 when you are safe.
 - Once evacuated/In a safe location, DO NOT reenter active area.

- **Hide**

If evacuation is not possible, find a place to hide where the active shooter is less likely to find you. Your hiding place should:

- If available, get to the designated safe room.
- Be out of the active shooter's view.
- Provide protection if shots are fired in your direction (i.e., an office with a closed and locked door).
- Do not trap you or restrict your options for movement.
- To prevent an active shooter from entering your hiding place:
 - Lock the door.
 - Blockade the door with heavy furniture.
- If the active shooter is nearby:
 - Lock the door.
 - Silence your cell phone and/or radio.
 - Turn off any source of noise (i.e., radios, televisions)
 - Hide behind large items (i.e., cabinets, desks)
 - Remain quiet.
- If evacuation and hiding out are not possible:
 - Remain calm.
 - Dial 911, if possible, to alert police to the active shooter's location.
 - If you cannot speak, leave the line open and allow the dispatcher to listen.

- **Take action against the active shooter (Fight)**

As a last resort, and only when your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter by:

- Acting as aggressively as possible against him/her
- Throwing items and improvising weapons
- Yelling
- Committing to your actions

- When encountering and responding to police, remain calm and follow all instructions from the officers. Officers may shout commands and push individuals to the ground for his/her safety as well as their own. When law enforcement personnel arrive at the scene, personnel should be aware of the following:
 - Follow all official instructions from police until specifically cleared to depart the incident scene.
 - Remain calm, think, and resist the urge to panic.
 - Immediately raise hands and spread fingers.
 - Always keep hands visible.
 - Put down any items.
 - Avoid making sudden or quick movements toward officers.
 - Do not point, scream, or yell.
 - Do not ask for help from officers when evacuating.
 - Proceed in the direction as advised by the officers; and
 - Provide all relevant information to the police.

Appendix 6 – Sample Security Signage

"No Trespassing" signs shall be posted on the perimeter fence and gates so as to be conspicuous from any approach to the facility.

- Signs should be posted at intervals not exceeding 330 ft or a continuous segment of fence less than 100 ft.
- In the absence of ordinance mandated language, wording shall state: "Posted - Private Property - No Trespassing - Violators will be prosecuted" or similar. "NO TRESPASSING" shall be in all capital letters not less than 3.5 inches in height; other wording should be not less than 1.5 inch in height.
- Signs shall identify prohibited items (weapons, alcohol, and drugs/controlled substances), serve notice that persons are subject to search, and that violations may result in discipline or referral to law enforcement. Concealed Weapons signs prohibiting the carrying of such shall be conspicuously posted on all routinely used entrances. Where allowed by law, Prohibited Substance signed shall be posted at all routinely used entrances.
- Signs posted on fencing surrounding energized equipment (i.e., at collection substation and POI switchyard) will indicate hazard and meet ANSI Z535 standards



- Site Security Rules sign at main access point should include:
 1. All vehicles and persons entering or leaving are subject to inspection
 2. Wear I.D. badge in a visible location
 3. Use of PPE is Mandatory in ALL construction areas
 4. Do not access areas marked as "RESTRICTED"
 5. Parking only in authorized areas
 6. Maximum speed on site 15 MPH
 7. Smoking Permitted in authorized areas only
 8. Use of any photo or video system is RESTRICTED
 9. No weapons of any kind are allowed on site
 10. No alcoholic beverages or drugs permitted on site

NOTE: Sign material shall be Engineer Grade Reflective Aluminum

Appendix 7 – 24-Hour Advance Notice of Unmanned Aerial System (UAS) Operation

The following information will be distributed to Project personnel prior to planned flight. If you have any questions, please call Project Security during normal business hours.

Facility Name	
Location	
Start (Date and Time of Operation)	
End (Date and Time of Operation)	
UAS Manufacture and Model Number	
UAS Registration Number (If applicable)	
Facility Representative	
24-Hour Contact Information	
Description	

THREE

NUMBER THREE ROAD (HWY-14)

350.00'

330.00'

175'

130' DIAMETER TRUCK TURN A ROUND

GRAVEL STORAGE YARD
± 36,000 SQ. FT.

PROPOSED
SINGLE STORY
O&M BUILDING
± 5,050 SQ. FT.

14 PARKING
STALLS

CONCRETE ELECTRICAL
TRANSFORMER PAD AND
PROTECTIVE WALL
HOIST LOCATION IN FIELD

6" OF ASH CONCRETE OVER

PRINTED WALL
HOIST LOCATION IN FIELD

AT RETAINED LAKE

PRINTED LAKE
CONTROL FENCE
SEE U.S. MAP 10

PRINTED LAKE
HOIST LOCATION IN FIELD

CONCRETE FENCE
SEE U.S. MAP 10

INDICATED PARKING SPOTS
CONCRETE AND ASH
HOIST LOCATION IN FIELD

PRINTED LAKE
HOIST LOCATION IN FIELD

CONCRETE FENCE
SEE U.S. MAP 10

SLURRY WALL
HOIST LOCATION IN FIELD

PRINTED LAKE
HOIST LOCATION IN FIELD

ALUMINUM DOOR
HOIST LOCATION IN FIELD

SCALE: 1" = 30'-0"

0 30' 30'

NORTH

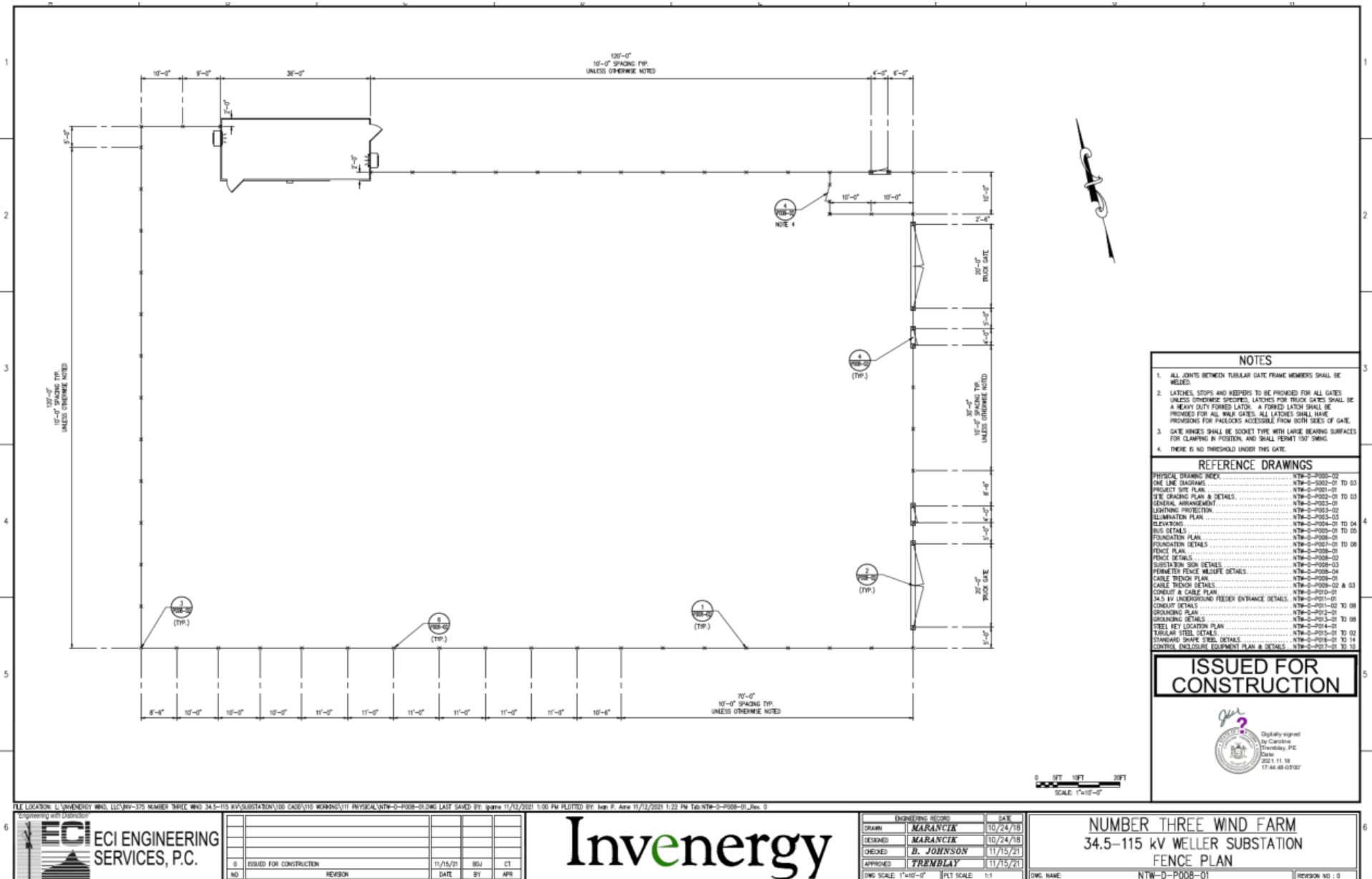
GENERAL NOTE:
1. ARCHITECTURAL
SEE CIVIL DRAWING

NOTE:
1. ALL ACCESS
SURFACES SHALL
100 C/M IN AREA

NOTE:
1. ALL BUILDING
FLOOR SLAB SHALL
MAX SLOPE OF
BUILDING DOOR

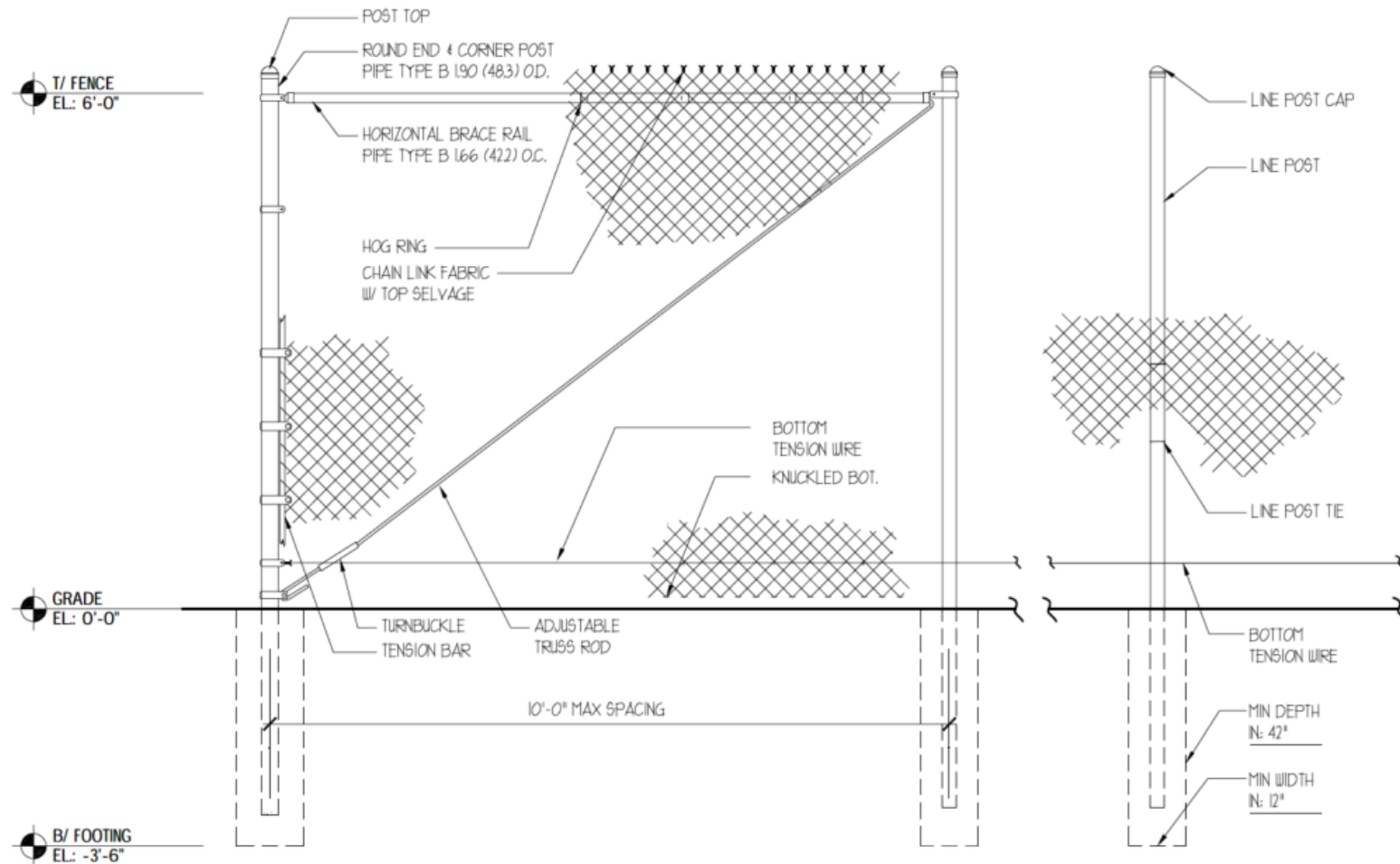
<p>GENERAL NOTE:</p> <p>1. ARCHITECTURAL SITE PLAN IS PROVIDED AS A REFERENCE ONLY. SEE CIVIL DRAWINGS FOR CONSTRUCTION DIMENSIONS / COORDINATES</p>
<p>NOTE:</p> <p>1. ALL ACCESSIBLE PARKING SPACES AND ACCESSIBLE SURFACES SHALL BE A LEVEL SURFACE NOT EXCEEDING 1/50 (2%) IN ALL DIRECTIONS</p>
<p>NOTE:</p> <p>1. ALL BUILDING DOORS SHALL BE ACCESSIBLE - PROVIDE 8' x 5' x 5' LEVEL LANDING OUTSIDE EACH EXIT DOOR; MAX SLOPE OF 1/50 BETWEEN ALL CURB CUTS AND BUILDING DOORS ALONG ACCESSIBLE ROUTES</p>

Appendix 9 – Site Plan: Weller Substation



Appendix 10 – Fencing Details

O&M Building Fencing Details

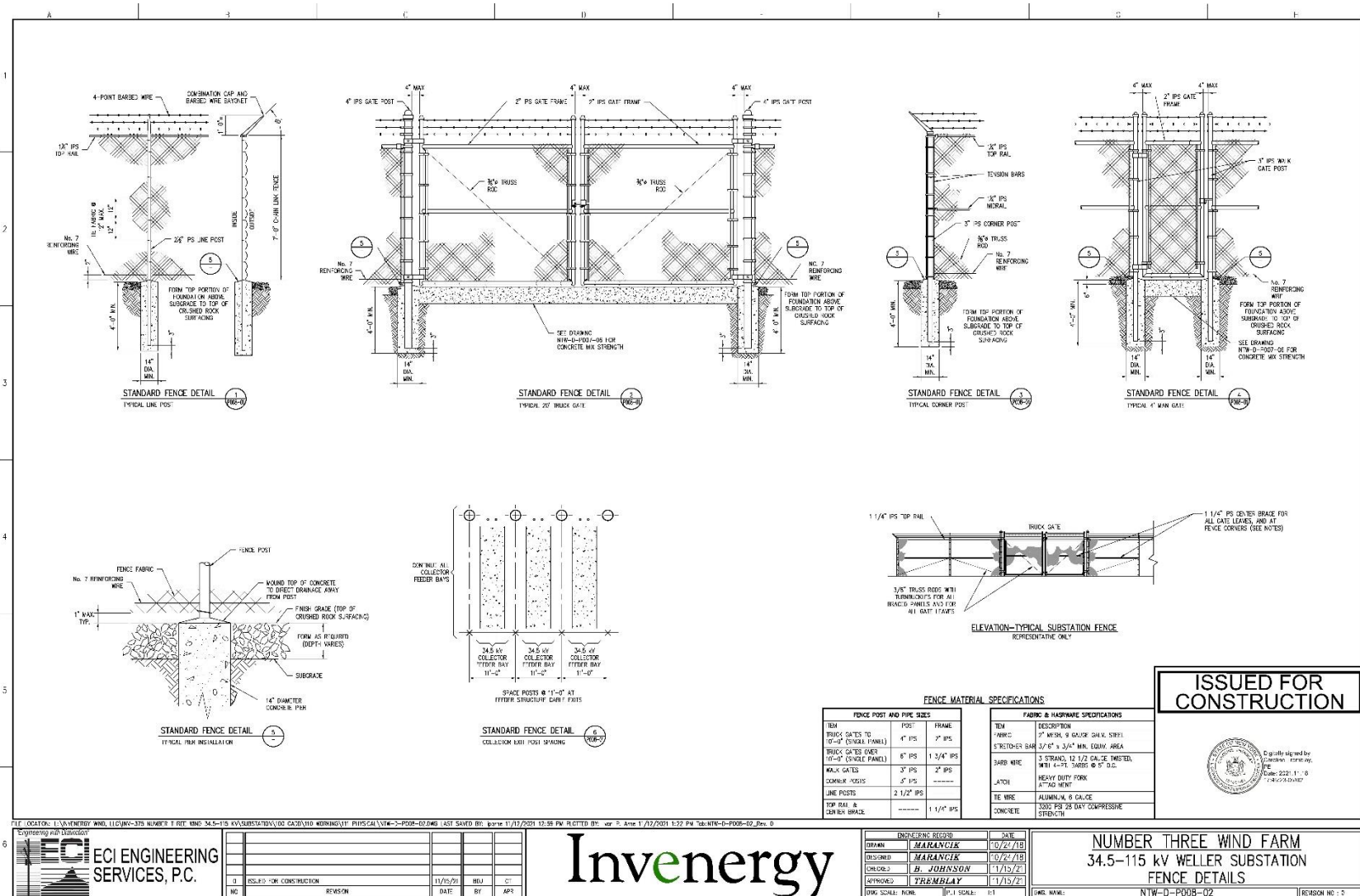


6

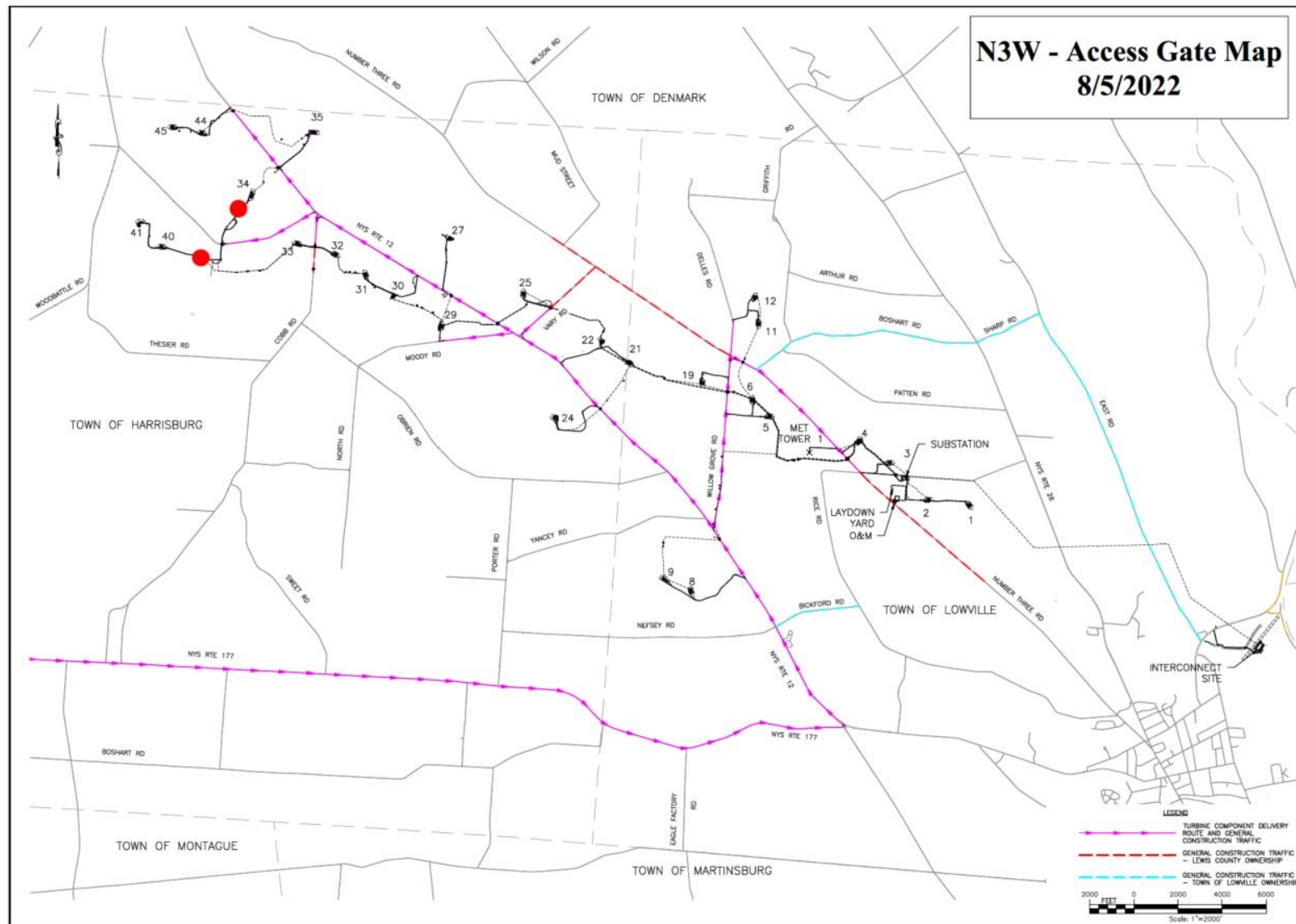
CHAIN LINK DETAIL

SCALE: 1/2" = 1'-0"

Weller Substation Fencing Details



Appendix 11 – NTW Gate Map



AMENDMENT RECORD SHEET

Version:	Description:	Date:
1.0	Original Document	08/15/22
1.1	Added Reference	08/19/22
1.2	Incorporated edits per DPS comments	10/25/22