

Attachment D

**Revised Appendix 6-2. Site  
Security Plan**

Appendix 6-2

**Site Security Plan**



Highest standards



# BROOKSIDE SOLAR, LLC

Matter No. 21-00917

Towns of Burke and  
Chateaugay,  
Franklin County, NY

Appendix 6-2 Site  
Security Plan

January 2022

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## **1.0 Purpose**

The Brookside Solar Project is located in the Towns of Burke and Chateaugay, Franklin County, New York. The Facility Site consists of approximately 1,471 acres of land either leased or purchased from owners of private property to the north of New York State Route 11. Most of the land within the Facility Site (prior to construction) consists of agricultural, undeveloped, and forested land uses. Surrounding land uses are primarily agricultural, rural residential properties. Ketcham Road and E Road are located along the western boundary of the Facility Site. The largest city in the vicinity of the Facility Site is the City of Plattsburgh, which is located approximately 42 miles to the southeast.

The Project consists of photovoltaic (PV) panels installed on low-profile racking systems mounted on poles driven directly into the ground. Inverters, which collect the electricity from the panels and convert it from direct current to alternating current, will be installed throughout the Facility Site. A new collection substation will take the power from the inverters and step it up to match the voltage of the electrical grid and tie in via the existing Chateaugay-Willis 115 kV transmission line. A protective fence will surround the Facility.

The Facility Site will be accessible via multiple gated entrances from State Route 11, County Route 23, Stuart Road, Martin Road, and Lewis Road. These roads are publicly maintained and will be open to traffic throughout the construction and operation periods of the Facility.

## **2.0 Site Security Features**

### **2.1 Access Controls**

Facility components will be enclosed with a chain link fence during both construction and operation of the Facility. The site will be accessible to Facility personnel, including construction contractors, via multiple locked gates. Gates will be outfitted with a “Knox Box” type locking system (or similar) to allow Facility access by emergency personnel. Additional access controls are not anticipated for the Facility. Gates will not be unlocked unless AES or authorized personnel are onsite. Additionally, office trailers will remain locked during non-working hours. Details on fencing and gates is included in the Design Drawings in Appendix 5-1 of the Section 94-c Application for the Facility.

## **2.2 Electronic Security and Surveillance**

Electronic security or surveillance facilities are not anticipated to be required during construction. All site personnel, contractors, and visitors to the site will be required to check-in at the main construction operations office or trailer in order for the Applicant to keep a record of visitors.

A security camera and monitoring system will be utilized at the collection substation and the site entrances for additional security during operation of the Facility. Surveillance monitoring will occur 24 hours a day and live monitoring will be conducted by the AES Control Center located in Salt Lake City, Utah. When unanticipated activity is detected outside of working hours, the AES Control Center will call the Facility's operations and maintenance (O&M) Manager or designee, and the local Sheriff's department/emergency services, as necessary. Daily reports will be maintained by the AES Control Center for all site activity.

## **2.3 Security Lighting**

The Facility will utilize manually operated exterior lighting as necessary during operation of the Facility. Security lighting will be installed only at the collection substation. The lighting will be strategically placed around the substation to emphasize worker safety during operation of the Facility. The Design Drawings in Appendix 5-1 of the Section 94-c Application detail the lighting plan and specifications. Security lighting will be maintained at the minimum levels needed to accomplish the associated task and will only be used when necessary to avoid offsite trespass. Visual disturbances will be minimized by the strategic lighting placement and limited lighting use, while providing adequate security for the Facility.

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. Full cut-off fixtures and task lighting will be used at the substation where feasible, as specified on the lighting plans in Appendix 5-1 of the Section 94-c Application. The majority of Facility construction work will be conducted during daylight hours. If lighting is needed for specific tasks, temporary manually operated lighting will be brought in and will only be utilized during active work periods in specific locations. No security lighting is proposed for the Facility during non-construction work hours.

## 2.4 Lighting for Aircraft Safety

The Facility does not include the installation of components greater than 200 feet in height; therefore, aircraft obstruction lighting is not applicable, and the Facility will not compromise aircraft safety.

## 2.5 Cyber Security

The Application will ensure protection of digital computer and communication systems in accordance with the Federal Department of Commerce's National Institute of Standards and Technology, the North American Electric Reliability Corporation (NERC), and/or International Organization for Standardization, as applicable.

The Applicant implements rigorous standards and guidelines that are aligned with the Global Technology Policy and Information Technology General Controls (ITGC) catalog, that provide the basis for Sarbanes-Oxley compliance, as well as with the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity. AES identified the following cyber security controls:

- Identify – Controls that support the identification and prioritization of AES assets, risks, and risk mitigation techniques;
- Protect – Controls that limit or contain the impact of potential cybersecurity events;
- Detect – Controls that support the timely discovery of cybersecurity events; and
- Respond & Recover – Controls that contain the impact of cybersecurity events and facilitate timely recovery to normal operations.

Cyber security guidelines that provide AES with a foundation for protection, detection, response, and recovery capabilities include the implementation of network security architecture; internet firewalls, business network firewalls, and control system network firewalls; the maintenance of a network device inventory and a software inventory; employment of malware defenses; assessment of vulnerabilities and patch management; development of an incident response plan; filtering of web content; protecting traffic flooding; and conducting penetration testing. Other cyber security guidelines established by AES include access control, change management and program development, operations management, data flow, remote access, and cybersafety and awareness. Guidelines were developed in conjunction with the following cybersecurity models: the Electrical Subsector Cybersecurity Capability Maturity Model (ES-C2M2); the Cybersecurity Council/SANS 20 Critical Security Controls (CSCs) for Effective Cyber Defense (SANS 20); and

technical guidance developed by NIST and the U.S. Department of Homeland Security (DHS) Industrial Control Systems Cyber Emergency Response Team (ICS-CERT).

Periodic independent cyber security audits will be conducted annually to validate the Facility's compliance with current standards. Third party providers will be sought out to perform independent reviews of the IT Services on behalf of AES. They will produce an annual independent audit report that will then be reviewed and assessed by AES management on an annual basis, who will then determine if risks are appropriately mitigated. The Facility owner and operator will be responsible for tracking, funding, and implementing site upgrades to meet updated standards, as necessary.

## **2.6 Signage**

In accordance with the local law, safety signage will include equipment specification information, safety information, and 24-hour emergency contact information including the toll free telephone number. As required by National Electrical Code (NEC), disconnect and other emergency shutoff information will be clearly displayed on a light reflective surface. A clearly visible warning sign concerning voltage will be placed at the base of all pad-mounted transformers and substations. The marking will be placed adjacent to the main service disconnect in a location clearly visible from the location where the lever is operated.

## **3.0 Security Risk Assessment**

Construction and operation of the Facility will be typical of solar facilities of this size and type and do not include additional security risk. The AES Safety Team has identified the following areas of potential risks associated with the construction and operation of the Facility:

- Health and Safety of the employees and subcontractors onsite;
- Material and equipment delivery, storage, and installation;
- Owned, rented, or leased equipment used onsite; and
- Tools, office facilities, and other miscellaneous items used onsite.

### **3.1 Security Risk Mitigation Measures**

To mitigate for the potential security risks outlined above, each employee, subcontractor employee, and other personnel will be required to meet the following criteria prior to being allowed unescorted access to the Facility Site:



- Complete AES Environmental Health and Safety (EHS) Onboarding
- Comply with AES Covid-19 requirements

Persons, visitors, or others not completing these measures must be escorted by a designated trained employee.

Additionally, the following criteria will apply to all owned, rented, or leased equipment to be used onsite during construction or operation of the Facility:

- All equipment utilized onsite will be by qualified operators specific to the equipment being used;
- AES company fleet policy will be strictly adhered to regarding all equipment onsite;
- All equipment will be maintained in working condition and not utilized if any hazards are identified; and
- No storage of personal vehicles or equipment will be allowed onsite during nights or weekends.

Tools, office facilities, and other miscellaneous items to be used onsite will be utilized and maintained per AES company policy.