

# Site Security Plan – Revision 1

## Hoffman Falls Wind Project

Towns of Fenner, Nelson, Eaton, and Smithfield

Madison County, New York



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Attachment A – Security Plan Acknowledgement Form

Attachment B – Corporate Cybersecurity Policy - REDACTED

## 1.0 PURPOSE

Hoffman Falls Wind LLC (the "Applicant" or "Hoffman Falls Wind") owned by Liberty Renewables Inc. will implement this Site Security Plan (the "Plan") at the Hoffman Falls Wind Project (the "Project") during Project construction and operation. The objective of the Plan is to support a safe work environment and minimize unauthorized access to the Project during construction and operation through implementation of appropriate security measures.

## 2.0 RESPONSIBILITIES

### 2.1 Project Site Management

The Project Manager/Site Manager is responsible for:

- Ensuring and verifying compliance with all aspects of this Site Security Plan, and all applicable federal, State and local laws and regulations, as well as Certificate Conditions imposed by the Office of Renewable Energy Siting (ORES); 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/Site Manager.

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

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

### 2.4 Information Technology Services

Liberty is responsible for:

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

Liberty 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 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 Director of Health and Safety**

The Director of Health and Safety is responsible for overseeing implementation of this Site Security Plan.

## **3.0 Physical Security**

### **3.1 Communications**

Cell phone coverage may be limited within the Project, 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.

Liberty will work with the 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 Project Manager/Site 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 implement the Site Security Plan for construction.

#### **3.2.1 Access Controls**

The public will not be allowed within the Project during construction. Access will be restricted by locked gates, other barriers, and/or signage as appropriate. Local first responder organizations will be provided access to the site in the event of an emergency. After hours, vehicular access to active portions of the Project 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 Project 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/Site 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 Project. 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 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 switchyard and transmission line at the Point of Interconnection (POI), which will be owned and operated by National Grid. Therefore, the Applicant will be responsible for safety and security during operation of the Project, excluding the switchyard and transmission line.

### **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 Project. The Applicant will install gates at the entrances to access roads as needed. Gates will be required to be kept locked when turbine maintenance is not occurring. Signage will be installed on gates warning the public not to trespass and of possible ice throw hazards. If unauthorized access is found to become a reoccurring problem (i.e., multiple incidents a month) or gates are found to be damaged, intrusion detection devices shall be evaluated for installation at the entrance of Project access roads. Unauthorized access and violations of access road gate locking by subcontractors and visitors may result in them being banned from the Project.

### **3.3.2 O&M Facility**

The operations and maintenance (O&M) facility 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 shall be locked at all times when Project personnel are not inside. A video camera or similar detection device shall be installed at the primary entrance of the O&M Building. Should unauthorized access, vandalism, or damage occur to the O&M Building, additional intrusion detection methods may be considered.

### **3.3.3 Wind Turbines**

Wind turbine access doors shall be closed and locked except when Project personnel are inside the turbine. Signage will be posted at every wind turbine stating that it is a federal offense to damage a wind turbine and stating that no trespassing is allowed on Project facilities. 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.

### **3.3.4 Lighting**

See Section 4 for a discussion of lighting plan information.

### **3.3.5 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.

## **4.0 Lighting Plan Information**

Lighting will be implemented at the Project to maintain adequate security at the Project during construction and operations and to meet Federal Aviation Administration (FAA) general requirements. A detailed Lighting Plan is included in the Visual Impacts Minimization and Mitigation Plan. The Lighting Plan:

- Addresses security lighting needs at substation and laydown yard sites;
- Provides plan and profile figures to demonstrate the lighting area needs and proposed lighting arrangement at any exterior equipment storage yards;
- Demonstrate how the lighting design will provide safe working conditions at appropriate locations. 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.

### **4.2 Operations Lighting**

Permanent security lighting will be installed at the wind turbine bases, interconnection facilities, and the O&M facility. 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.

#### **4.2.1 Turbine Lighting**

Lighting shall be installed on turbines for aviation hazard marking as specified by FAA. 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 impacts 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 and Switchyard Lighting**

Lights at the substation and switchyard will be the lowest intensity required to accomplish their safety purpose and comply with National Grid requirements, where necessary. 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. The lighting was designed to avoid any redundant and ineffective lighting.

#### **4.2.3 O&M Facility Lighting**

The O&M facility 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 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.

## **5.0 CYBER SECURITY**

The Applicant will partner with an industry leader in cyber security that will provide continuous (24 hrs/day, 7 days/week, 365 days/year) monitoring and alerting for all digital computer and communication systems and networks which support the Facility. The partner will demonstrate compliance with current standards established by the National Institute of Standards and Technology (NIST), the North American Electric Reliability Corporation (NERC), or the International Organization for Standardization, or equivalent. Multi-point tiered threat detection will be employed, and cyber monitoring will include all cyber assets at the site.

As part of the Applicant's NERC Compliance Program approach, physical and electronic security controls will be implemented that ensure cyber security compliance. The proposed Facility is rated as a Low Impact NERC facility and will follow several corporate policies implemented by the Applicant 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.

All NERC/Regional Reliability Standards applicable to the site will be adhered to by the Applicant. The Applicant will use an independent auditor to periodically validate compliance to the applicable standards at least every 15 months.

Credentials and remote access permissions, including those granted to third parties, shall be administered on a case-by-case basis by both Facility Management and the IT/OT Team. Third party vendors who require electronic access to BES Cyber Systems may, on a case-by-case basis, be managed by service agreements. Inbound electronic access shall be done through a demilitarized zone (DMZ). Remote access shall be

provided by a jump station and virtualized through a corporate computer located at the Applicants headquarters. Remote Desktop Protocol (RDP) connection shall be used on the jump box so that no external laptops (i.e., home laptops) can access the engineering workstation or Human Machine Interface (HMI). Before remote accessing into the low impact BES system, an approval shall be given and granted by physically acknowledging the remote connection request by an operator in the control environment.

The IP addresses and connectivity shall be restricted in the control environment to limit the number of available connections on the network. All ports not necessary for protocols in the control environment shall be disabled. Where possible, unidirectional gateways shall be used in place of bidirectional gateways, including the routing of performance monitoring staff so that these staff cannot access any control systems in the control environment. For additional details regarding the Applicant's corporate cybersecurity policies that will be implemented at the Facility, see Attachment B.

## **6.0 EDUCATION AND TRAINING**

All Project-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.

A copy of this Plan is provided to each person on site and is to be available at all times for all site personnel to review at the O&M facility.



## **Attachment A**

### Security Plan Acknowledgement Form

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

[illegible]

## **Attachment B**

Corporate Cybersecurity Policy -

REDACTED

Attachment B Corporate Cybersecurity Policy for Hoffman Falls Wind – Matter No. 23-00038:

This document contains critical infrastructure information, confidential commercial information, trade secrets, and/or proprietary information and as such is entitled to confidential treatment under Section 87(2) of the New York State Public Officers Law and Protected Order in this proceeding. An unredacted version of this document has been submitted under separate cover.