Fenton Wind Project

PERMIT COMPLIANCE FILING

August 5, 2020
Fenton Power Partners I, LLC
Amended LWECS Site Permit
Murray and Nobles Counties, Minnesota
IP-6499/WS-05-1707
Section 10.8
Emergency Response

Fenton Power Partners I, LLC ("Fenton") respectfully submits this compliance filing in accordance with Section 10.8 of the large wind energy conversion system ("LWECS") Site Permit issued on March 8, 2019 (the "2019 Amended Site Permit") by the Minnesota Public Utilities Commission ("Commission"):

10.8 Emergency Response

The Permittee shall prepare an Emergency Response Plan in consultation with the emergency responders having jurisdiction over the facility prior to project construction. The Permittee shall submit a copy of the plan, along with any comments from emergency responders, to the Commission at least 14 days prior to the pre-construction meeting and a revised plan, if any.

The Permittee shall provide as a compliance filing confirmation that the Emergency Response Plan was provided to the emergency responders and Public Safety Answering Points (PSAP) with jurisdiction over the facility prior to commencement of construction. The Permittee shall obtain and register the facility address or other location indicators acceptable to the emergency responders and PSAP having jurisdiction over the facility.

Attached hereto is the Emergency Response Plan (the "Plan") for the Fenton Wind Project ("Project"). The Plan is updated every year, with a copy of the updated Plan delivered to the local fire department every year. Fenton has provided the Plan to the emergency responders and Public Safety Answering Points ("PSAP") with jurisdiction over the facility. Attached to this filing are the correspondence, certificate of service, and mailing list.



Procedure **Emergency Preparedness and Response Plan (EPRP)** All EDFR Employees

REVISION 3

PUBLISHED Jan 2020

.3 Risk Level	Standard	Language	Country
I/A	4.7 EMERGENCY RESPONSE	EN	US/Canada/Mexico

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PURPOSE

Disasters are the consequence of inappropriately managed risk. These risks are the product of a combination of both hazards and vulnerability. In order to prevent loss from a disaster, an Emergency Preparedness and Response Plan (EPRP) must be developed, implemented and regularly tested.

The purpose of this Emergency Preparedness and Response Plan (EPRP) is to assist employees, sub-contractors, contractors, suppliers and management in making quality decisions during times of crisis.

This plan contains guidance in determining the appropriate actions to be undertaken to prevent injury and property loss, minimize hazards to human health and safety and to the environment from fire, explosion, or any unexpected release of hazardous materials to the air, soil, surface or groundwater, and natural or human disasters.

This document acts as a guideline in the event of an emergency. Every possible version of every imaginable scenario can never be captured in a usable document. The steps described may not occur in the same order at every site, every time, but this EPRP provides baseline directions on the most common steps necessary to address each situation listed.

SCOPE

This EPRP will serve as the baseline plan for employees and visitors in the event of an emergency. In situations where this plan runs in parallel with another entity's plan (for example a building manager, contractor, project manager, or customer) the plans shall be evaluated to determine if gaps exist, and management must coordinate to ensure effectiveness in the event of an emergency.

This plan applies to all EDF Renewables facilities, to include but not limited to: wind, solar, bio and office locations. UNLESS SPECIFICALLY STATED, THE TERM "HE" OR "SHE" SHALL REFER GENERICALLY TO AN INDIVIDUAL AND NOT A SPECIFIC GENDER.

ROLES AND RESPONSIBILITIES

While the Site Manager can develop and enforce appropriate procedures to follow in the event of an emergency situation, it is the responsibility of every employee to become acquainted with the EPRP prior to an emergency and respond accordingly.

1. Employees

Every employee shall take reasonable care to protect the health and safety of themselves and of other employees present and inform their manager of potential hazards present on site.

Every employee shall serve in the capacity of emergency first responder. Each employee shall be trained to the same level of first responder, and be trained in CPR, First Aid, and AED.

It is the responsibility of each employee to have a representative who has been properly trained and who understands his roles and responsibilities as a substitute. When the employee chooses his substitute, he must verify he has the training and authority to fulfill his role during an emergency.

2. EPRP Coordinator (CANADA SITES)

When an emergency situation occurs at the site, office and/or facility, the safety of employees and visitors will be coordinated by the EPRP Coordinator or his representative. The EPRP Coordinator shall be the Site Manager of the site, office and/or facility, and he shall name a person who will be able to be the Emergency Contact in case of his absence.

3. Site Manager

The site manager shall ensure that the employees under his care are present and safe in the event of an incident. He/she must ensure all employees are present after a Roll Call.

He/she must inform his/her employees about the risks related to their job.

He/she must ensure all employees have read and understand the site EPRP. He/she must make sure all the rescue equipment is available and in good condition.

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He/she must ensure the EPRP is complete, up to date and distributed to the proper parties.

He/she ensures that the EPRP is used correctly and that emergency operations comply with current regulations (federal, provincial or state, corporate and local).

In the event where the SM is not located fulltime on a site, he/she designates an EPRP representative who will be responsible in case of emergency.

He/she ensures that material, financial and personnel resources are sufficient to enable the development and implementation of the EPRP and the implementation of the training program.

He/she ensures that action plans are executed to correct any non-compliance and to implement the recommendations of post-incident reviews.

In the event that the emergency creates off-site impacts, he/she will establish a center of claims (Canada).

In collaboration with the HSE Manager and other internal and external resources, he/she declares the end to an emergency.

4. Contractors, Sub-contractors and Visitors

The contractor or other entity makes available the skilled labor and equipment required during emergencies and collaborates with the site manager or designee for a prompt and effective response.

All contractors and sub-contractors must sign the Contractor Orientation acknowledgement before working on site, at least once a year or after a major update of the document.

DEFINITIONS

OSHA: Occupational Safety and Health Administration

CNPI: National Fire Code of Canada 2010

CSA: Canadian Standards Association

Defensible Space: An area around a building or other protected area in which vegetation, debris, and other types of combustible fuels have been treated, cleared, or reduced to slow the spread of fire to and from the building or protected area.

DRP: Disaster Recovery Plan

EMC: Emergency Measures Committee

EPRP: Emergency Preparedness and Response Plan

ERT: Emergency Response Team

ESS: Emergency Escape System (Emergency Rescue Kit)

HSE: Health, Safety and Environment

LDSS: Lightning Decision Support System

NFPA: National Fire Protection Association

OHS: Occupational Health and Safety

OR: Owner Representative

QHSE: Quality, Health, Safety and Environment

SDS: Safety Data Sheet

SM: Site Manager / Project Manager

WCB: Workers compensation board

PV: Photovoltaic

Wildfire: An uncontrolled fire in an area of combustible vegetation occurring in rural or low population density urban areas.



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POLICY

1. Legal Requirements

This EPRP will meet the applicable requirements of federal regulation, including provincial or state legislation, as well as local regulations regarding emergency preparedness and response planning.

Failure to comply with this plan may result in disciplinary action up to and including termination. This plan will be reviewed at least annually by HSE and may be revised based on changes to federal, provincial or state and local regulations and requirements.

The present EPRP is aligned with:

- OSHA 1910.38 Emergency Action Plan Requirements
- Alberta, Occupational Health and Safety Code;
- Canada Occupational Health and Safety Regulations;
- CSA Z731-03 (R2014)- Emergency Preparedness and Response Standard;
- NFPA 1, Fire Code:
- NFPA 10 Portable Fire Extinguishers
- Ontario, Occupational Health and Safety Act
- Quebec, Regulation respecting occupational health and safety; The EPRP foresees, among others:
- Development and application of a Fire Safety and Emergency Preparedness and Response Plan;'

2. EPRP Distribution

Every site will develop and maintain an individual EPRP. Sites that are serviced or maintained by the same group of personnel (for instance, adjoining solar sites) shall have an EPRP for each site.

The EPRP format will be determined by HSE and maintained on the document management system by Document Control.

All EPRP contact information and appendix pages for each facility / project must be updated annually. The updated contact page shall be sent to the Operations Control Center (OCC) and HSE. When a project EPRP is changed or information updated, the plan shall be updated and forwarded to the OCC and HSE within 72 hours.

Hard copies of the site EPRP shall be kept in a prominent location near the facilities main entrance. EPRP's shall be stored in a red binder that is not similar to other binders utilized at the site. This allows ready identification by any personnel on site. All site personnel shall be familiar with the EPRP location.

3. Training

Training is an important part of the EPRP. Training should be continuous and on a regular basis for employees and first responders to maintain their ability to use the emergency equipment and act appropriately in an emergency.

To ensure the instructions contained within the EPRP are properly followed during site/facility emergencies, a training program is to be developed and training provided to all employees, upon hire and after any changes in site/facility operations or layout. This training will be conducted yearly as part of the Payday Friday safety training program.

The training must include exercises appropriate to the work site that simulate the potential emergencies identified in the EPRP.

The effectiveness of the training sessions and the training program in general should be evaluated and documented on the FORM, COURSE CRITIQUE. The critique shall evaluate what areas of the training need improvement, what should be sustained, and what can be done differently to improve the overall efficacy of the training.

Completed critiques shall be forwarded to the area HSE specialist within 72 hours of the completion of the training. HSE shall review each critique, evaluate the training and engage appropriate parties as necessary to address any mentioned shortcomings. HSE shall file the critiques in a site-specific folder on ECRM or the HSE drive.

Any suggested improvements to the training that merit follow-up or require long term implementation shall be entered into the corrective action database on ECRM for tracking to completion, by the HSE representative responsible for that site.

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4. Drills and Exercises

To ensure that the site EPRP is adapted to meet current site conditions and that all involved individuals will respond properly, the EPRP will be tested on a regular basis (but not less than once per calendar year) by the site manager.

Practical exercises should be performed regularly in order to: train employees and test their skills, check the EPRP and its components and verify the efficacy of the emergency communication and organizational structure. These exercises should be regularly reviewed to identify and correct deficiencies.

An evacuation drill of the site must be performed at least once a year. To aid in these drills during a real emergency, a map of the facilities shall be posted at the site showing the escape routes, rescue evacuation kits, shelters, fire extinguishers, exits to be used during an evacuation and the designated assembly areas.

Annual site drills do not require the attendance or inclusion of local emergency services (fire department, emergency room, police, etc.).

New sites or newly acquired sites shall hold, upon site commissioning or when EDFR accepts responsibility for the site, a full drill that includes local emergency services. These drills shall, as accurately as possible, mimic a real-time rescue event and include and exercise as many rescue organizations as possible. Though not required, at the sites request HSE may manage and coordinate the execution of these drills.

Every 5 years, each site shall conduct a full drill that includes local first responders and emergency services.

Specific areas to be evaluated during the drills will include the following:

- Evacuation and accountability of personnel;
- Proper functioning of alarm system (if applicable), radios and/or phones;
- Special procedures for evacuation of personnel with special disabilities or impairments;
- Response time of emergency response personnel;
- Adherence to EPRP procedures.

The effectiveness of the training sessions and the training program in general should be evaluated and documented on the FORM, COURSE CRITIQUE. The critique shall evaluate what areas of the training need improvement, what should be sustained, and what can be done differently to improve the overall efficacy of the training.

Completed critiques shall be forwarded to the area HSE specialist within 72 hours of the completion of the training. HSE shall review each critique, evaluate the training and engage appropriate parties as necessary to address any mentioned shortcomings. HSE shall file the critiques in a site-specific folder on ECRM or the HSE drive.

Any suggested improvements to the training that merit follow-up or require long term implementation shall be entered into the corrective action database on ECRM for tracking to completion, by the HSE representative responsible for that site.



5. Emergency Communications

In the event of an on-site emergency, the Site Manager, Local Manager or equivelant shall be deemed the Emergency Manager. The Emergency Manager is in charge of directing the local response to the incident until:

- 1. Relieved by competent first responders.
- 2. Relieved by a higher authority within the EDFR organization.
- 3. The emergency is resolved.

At the first notification of an emergency or crisis, the Emergency Managers priorities shall be:

- 1. Notification of first responders through 911 or area dispatch.
- 2. Scene Management. Assigning EDFR resources and employees to respond to the emergency as appropriate and safe, as directed in the individual response sections of this document.
- 3. Notification of the first level of management above the Emergency Manager.
- 4. Requesting additional resources as required.
- 5. Incident resolution
- 6. Reporting

Notification Tiers

After alerting appropriate first responders and dispatching EDFR resources, as time permits the Emergency Manager shall make notification to the tier of EDFR management above the Emergency Manager. This should be the only internal notification the Emergency Manager makes, as further notifications are taken by the higher tiers within EDFR. A typical tier system will follow the format found in Appendix 6: Emergency Communications Flowchart.

- **Tier 1: Emergency Manager.** The highest-level manager, or their designee, ON SITE who manages the emergency.
- Tier 2: Area, Work Group, Facility or Equivalent Level Manager. This is the Emergency Managers direct point of contact. Unless requested by the Emergency Manager, no other tier should have direct contact with the Emergency Manager, to allow them to focus on emergency management. The Tier 2 individual is responsible for contacting HSE and OCC as appropriate and obtaining additional EDFR resources as requested by the Tier 1.
- Tier 3: Senior Manager or Director. This tier is responsible for making the broader notifications to the senior management group within EDFR. They are responsible for communicating with Tier 2 and ensuring EDFR resources as requested by Tier 2 are implemented.
- Tier 4: Executive Committee. Upon notification of an emergency, this Tier conveys any required information to the CEO. This Tier is responsible for managing any potential company-wide effects of the emergency and ensuring that Tier 3 is made aware of any potential ramifications that need to be managed at the site level. This Tier is responsible for evaluating any effects the emergency may have on external stakeholders, and as required shall be the point of contact for any media outlets. Tier 4 personnel or their designees are responsible for making internal, company-wide incident notifications based on the severity chart found below.
- **Tier 5: External Stakeholders and Media.** This Tier does not have a direct link to the emergency but may drive the response through contractual requirements or opinion.



Internal Communications

Tier 4 personnel hold overall responsibility for communicating to the EDFR Renewables organization details concerning high profile incidents and emergencies.

In general, HSE will provide these internal communications in the form of Lessons Learned, Safety Notifications, and Incident Notifications. On occasion, an incident may rise to the level requiring direct communication from the CEO, such as in the event of a fatality or catastrophic equipment failure. In these instances, Tier 4 personnel will collectively decide the wording, format and responsible party for this communication.

Severity	Incident Types	Preliminary Report	Complete Investigation Report
LOW	Near Miss Minor Property Damage First Aid	х	
MEDIUM	Significant Near Miss/High Potential Incident Significant Property Damage	Х	Х
HIGH	Recordable Incidents (Fatality, Lost Time, Medical Treatment, Modified Work)	Х	Х

- Low Severity Incidents do not warrant any company-wide communications.
- Medium Severity Incidents may require routine company-wide communications based on investigation findings but typically do not require any communications on an emergency basis.
- High Severity Incidents require an initial event notification with any immediately known facts, as well as a followup notification following conclusion of the investigation and any legal review required.



6. Fire Prevention

Listed below are specific procedures that shall be addressed by the site to minimize the occurrence of, and impact from, a fire emergency. Special emphasis is placed on housekeeping and storage practices in all maintenance, shop, and general office areas where flammable and combustible materials are used and stored.

Fire prevention is the responsibility of all personnel. Employees shall follow safe practices to minimize fire hazards, and managers must ensure safe practices are followed daily. As an organization EDFR is committed to preventing the occurrence of fires and situations that may promote a fire at any site or facility.

INSPECTION OF FIRE PROTECTION EQUIPMENT

All fire protection equipment will be inspected monthly by the site manager or designee.

All areas at each site/facility will be inspected to check for unsafe conditions, such as blocked or locked fire exits, poor housekeeping, smoking in non-designated areas, flammable/combustible materials not stored properly and obstructed access to electrical rooms and panels, etc. All results will be recorded on the Facility Inspection Checklist (OM-01-5473).

FACILITY EMERGENCY ALARM SYSTEM

Not all jurisdictions, states or provinces require the presence of a fire alarm and/or fire suppression system.

As part of the annual drills, the fire alarm system (if equipped) shall be tested for functionality after alerting the alarm company (or fire department if directly monitored) of the drill.

For those sites who do not have a central facility alarm system, a method of communicating a fire hazard to all employees in a rapid and obvious manner shall be developed at the site. This method of notification may include radio, whistles, air horns or yelling (for example), provided that all potential occupants of the facility can be notified from a singular location, meaning the notification process does not require an individual to move through the facility making notifications.

CREATE A WILDFIRE PREVENTION PLAN

Area Managers in areas where wildfire poses a potential hazard (even limited times of the year) consult with their local BLM (Bureau of Land Management) office or other fire response entity to develop a site-specific Wildfire Prevention Plan (Appendix 7). This plan should include criteria for operations during high fire risk conditions, creation of Defensible Space, and other operational activities or restrictions to reduce the risk of igniting a wildfire. In addition, the plan should include site shutdown procedures, site evacuation, and protection of personnel and equipment in the event of wildfire.

The site FACILITY OPERATING PLAN will specifically indicate whether or not local conditions require a Wildfire Prevention Plan, as dictated in WORK INSTRUCTION, FACILITY OPERATING PLAN.

CREATE DEFENSIBLE SPACES

One of the cheapest and most effective ways of mitigating the effects of wildfire is by creating spaces around solar panels, transformers and turbines that is void of fuel (grasses, trees, brush). The concept of Defensible Space (also known as firescaping) reduces the risk of fire starting and/or spreading from one area to another on a property or site. By following the basic principles of Defensible Space, EDFR sites can reduce the risks associated with drought and wildfires

- 1) The primary principle of Defensible Space is fuel reduction. Minimizing dried grasses, vegetation and debris by early season weed abatement and regular ongoing maintenance will reduce combustible fuel mass onsite.
- 2) In fire-prone areas, cut dry weeds and grass in early morning hours when temperatures are cooler thus reducing the chance of sparking a fire. This is especially important in areas where there are rocks, and mower blades can hit rocks and create sparks which set fire to dried grasses.
- 3) When possible remove surface litter from cutting/mowing operations.
- 4) Ensure a perimeter which is "low, lean and green" around structures:
 - a) Offices
 - b) Substations
 - c) Transmission lines
 - d) Meteorological towers
 - e) Laydown yards
 - f) Solar arrays

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- g) On-site fueling stations
- h) On-site LP storage
- i) Other areas that need protection or prevent fire from spreading to the surrounding community.

MONITOR WEATHER AND FIRE CONDITIONS

Current fire conditions are updated in real time on the US Geological Survey webpage (USGS Firemap), as well as the ArcGIS webpage (ArcGIS Fire Information).



7. FIRE

Employees and contractors shall notify the SM immediately upon discovery of a fire. Different types of fire will require different types of response.

GRASS, BRUSH AND FOREST FIRE

- 1. Evaluate the situation to determine if the fire can be extinguished safely with an extinguisher (if you have been trained on the use of an extinguisher). Prohibit access to the affected area by other employees.
- 2. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
- 3. The SM shall obtain details of the exact location and size of the fire from the Notifier.
- 4. The SM shall call 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 5. The SM will contact any land owners in the area with the location and size of the fire.
- 6. The first responders may be directed by the SM to visit any buildings / dwellings that may be in the anticipated path of the fire.
- 7. Only employees trained to fight fires may do so and only under instruction from the Civilian Authorities. In all other events, employees, contractors, and first responders shall at no time attempt to extinguish or "fight" a grass/brush fire. The employee/contractor role is to notify the SM and lead first responders to the scene. DO NOT attempt to fight a fire that has escalated beyond your training or your capabilities; you and only you can evaluate your capabilities, if you think the fire has escalated beyond your capabilities, leave!
- Report to the nearest assembly (Muster point) area for roll call until "ALL CLEAR" is given or until directed to do otherwise. DO NOT run or create panic; DO NOT go to your car or leave the premises unless your safety is in danger.
- 9. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
- 10. Complete the Accident / Incident Report and call the HSE Manager as soon as all personnel are accounted.

IF CAUGHT IN THE FIRE OR HEAVY SMOKE:

- Take short breaths: breathe through your nose, then crouch under the smoke line to escape;
- Place a shirt or a cloth covering over your nose and mouth, if possible.



TURBINE FIRE – NO PERSONNEL PRESENT

- 1. The employee discovering the fire shall immediately get the GPS coordinates of turbine.
- 2. Call the SM. The SM will manage the incident and implement the site fire plan if applicable.
- 3. The SM shall call 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 4. Employees, contractors, and first responders shall at no time attempt to go up tower to extinguish or "fight" a turbine fire. The employee or contractor role is to notify the SM and lead first responders to the scene.
- 5. Report to the nearest assembly (Muster point) area until "ALL CLEAR" is given or until directed to do otherwise. DO NOT go to your car or leave the premises.
- 6. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
- 7. Complete the Accident / Incident Report and call the HSE Manager as soon as all personnel are accounted.



TURBINE FIRE – PEOPLE IN NACELLE, HUB OR ROTOR

- 1. If a fire occurs up tower while employees or contractors are working in the nacelle or hub immediately stop work, alert all others present, and if time permits, place equipment in a safe condition.
- 2. Evacuate Immediately.
- 3. Only employees trained to fight fires may do so. In all other events, employees, contractors, and first responders shall at no time attempt to go up tower to extinguish or "fight" a turbine fire. The employee or contractor role is to notify the SM and lead first responders to the scene. DO NOT attempt to fight a fire that has escalated beyond your capabilities; you and only you can evaluate your capabilities, if you think the fire has escalated beyond your capabilities, leave!
- 4. If necessary, provide rescue assistance to the person in the turbine. Do not place your own life at risk.
- 5. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
- 6. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 7. If you are caught in a fire while working in the Nacelle, Hub or Rotor:
 - a. In case of heavy smoke, crouch below the smoke line to get to the lowest point;
 - b. Take short breaths; breathe through your nose;
 - c. Place a shirt or a cloth covering over your nose and mouth, if possible;
- 8. If passage through the tower is impossible;
 - a. Stay calm, access the top of the turbine if possible and stay there until rescue personnel arrive;
 - b. Maintain communication with the ERT;
 - c. If necessary and possible, open hatches to ensure that fresh air is available.
 - d. If it is necessary to exit the turbine, choose the safest way out;
 - e. Reach the emergency escape kit;
 - f. Inspect the rescue equipment;
 - g. Locate the anchor point and attach the descent equipment.
 - h. Exit the turbine.
- 8. When EVERYBODY is out, have the turbine stopped remotely.
- 9. When outside, keep away from smoke and fire. Evacuate people to the closest safe area.
- 10. Complete the Accident / Incident Report and call the HSE Manager as soon as all personnel are accounted.



FIRE AT THE OPERATIONS FACILITIES, BUILDINGS, OFFICES

- 1. In the event of a fire in the operations facilities, the employee discovering the fire shall immediately stop work.
- 2. Evaluate the situation to determine if the fire can be extinguished safely with an extinguisher. DO NOT attempt to fight a fire that has escalated beyond your capabilities; you and only you can evaluate your capabilities. If you think the fire has escalated beyond your capabilities, leave!
- 3. Activate the fire alarm and alert all employees in the building.
- 4. Prohibit access to the affected area to other employees;
- 5. The person discovering the fire shall immediately get the GPS coordinates or address of the facility.
- 6. Call the SM. The SM will take on the management of the incident and implement the site fire plan, if applicable.
- 7. Call 911 with GPS coordinates of meeting point location, the exact location and the size of the fire.
- 8. The Notifier to remain in a safe place near the incident until help arrives and to direct the first responders toward the fire;
- 9. Calmly form evacuation lines. Be ready to merge with other people evacuation building; close doors to offices and buildings as you leave;
- 10. If you are descending a stairwell, stay on the right side. Fire fighters use their right side when climbing stairs;
- 11. Keep talking to a minimum;
- 12. Listen for instructions and follow them;
- 13. Employees will assemble at the Muster Point until "ALL CLEAR" is given by the SM or until directed to do otherwise; DO NOT Return to building for personal items; DO NOT run or create panic; DO NOT go to your car, or leave the premises;
- 14. All employees, contractors and visitors shall remain clear of buildings and structures until an all clear notice is received from fire-fighting personnel;
- 15. If the SM present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
- 16. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.



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FIRE IN A SOLAR POWER SYSTEM, INVERTER OR BATTERY

- 1. In the event of a fire in a Solar Power System, the employee discovering the fire shall immediately stop work. DO NOT attempt to fight a fire in a Solar Power System.
- 2. Activate the fire alarm and alert all employees at the site or near the solar power system.
- 3. Prohibit access to the affected area to other employees;
- 4. The person discovering the fire shall get immediately the GPS coordinates and ask for the shutdown of the utilities, including the electrical utilities to remove the electrical shock hazard.
- 5. Isolate and shutdown as much of the system as possible
- 6. Isolate the photovoltaic system at the inverter using reliable methods if possible and not hazardous.
- 7. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
- 8. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) with GPS coordinates of the Solar Power System, the exact location and the size of the fire AND inform the 911 operator that the emergency is a fire in a solar system or in a building equipped with a solar power system.
- 9. Inform emergency personnel about the system being a thermal system or a photovoltaic system as photovoltaic system includes electric shock hazard, while thermal system includes potential scalding from hot fluid.
- 10. The Notifier shall remain in a safe place near the incident until help arrives to direct the first responders toward the fire;
- 11. While salvage covers can be used to block sunlight, some electricity will still be generated unless they are made of material 100% light blocking. Care is needed to make sure that wind does not suddenly blow off any salvage covers covering panels. Foam is not effective in blocking sunlight and will slide off the solar array.
- 12. Employees will assemble at the Muster Point until "ALL CLEAR" is given by the SM or until directed to do otherwise;
- 13. Remain at the assembly area until directed to leave; All employees, contractors and visitors shall remain clear of the Solar Power System until an all clear notice is received from fire-fighting personnel;
- 14. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.



FALLEN, SWAYING OR BOUNCING POWER LINES

- 1. If an overhead power line has fallen to the ground, it may still be live. Keep well away the current can travel along the ground, through objects such as fences or metal objects and through water or other liquid. You do not need to touch the power line to be killed or injured by it.
- 2. If you see a fallen power line stay well clear ideally distance yourself by at least 10 meters / 33 Feet.
- 3. Call 911 or the local power provider.
- 4. Call the SM
- 5. If power lines fall on your car, it is safest to remain inside the vehicle. Do not touch the windows, doors, or anything metal such as the radio. Wait for trained professionals to rescue you. Warn anyone who starts walking towards the car to stay far away.
- 6. Use your horn to alert others.
- 7. If you are in a vehicle when a line falls, if it is safe to do so, remain in the vehicle until emergency services or local electricity provider says it is safe to get out. If you must get out of the vehicle because of fire, you must get out of the vehicle without touching metal and the ground at the same time.
 - a. Gently open the door all the way, being careful not to touch anything metal, and look for the flattest spot on the ground.
 - b. Position your body so that you are facing toward the ground.
 - c. When you jump, you will be more stable if you tuck in your elbows and keep your hands clasped. Jump off the car and land on both feet at the same time with your arms folded across your chest. Do not contact the vehicle and the ground at the same time with any part of your body or clothing.
 - d. Shuffle (or bunny hop don't step) your feet across the ground until you reach a safe distance away from the car. A safe distance is considered at least 10 feet (3 meters). Keep your feet no further than 6 inches apart.
- 8. Your car may be pushed in the rear bumper by another car to attempt to remove the power lines and get your car away, if emergency circumstances dictate an immediate evacuation. Do not attempt this if there is not an immediate threat.
- 9. In the event the vehicle catches fire, DO NOT attempt to fight the fire. Only employees trained to fight fires may do so and only under instruction from the Civil Authorities. In all other events, employees, contractors, and first responders shall at no time attempt to extinguish or "fight" a fire in the presence of fallen electrical power lines. The employee or contractor role is to notify the SM and lead first responders to the scene
- 10. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.



ELECTRICAL FIRE IN SUBSTATION

- 1. In the event of an electrical fire inside the substation, the employee discovering the fire shall immediately stop work. DO NOT attempt to fight an electrical fire;
- 2. Activate the fire alarm and alert all employees at effected location.
- 3. Prohibit access to the affected area to other employees.
- 4. The person discovering the fire shall immediately get the GPS coordinates of the substation.
- 5. Call the SM. The SM will take on management of the incident and implement the site fire plan, if applicable.
- 6. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 7. Employees, contractors, and first responders shall at no time attempt to extinguish or fight an electrical fire. The employee or contractor role is to notify the SM and lead first responders to the scene.
- 8. Remote isolation of the substation should be requested, completed, and confirmed.
- 9. Transformers and capacitors contain flammable/combustible material and all personnel must remain in safe areas away from these potentially explosive sources.
- 10. IF CAUGHT IN THE FIRE OR HEAVY SMOKE
 - a. In case of heavy smoke, crouch below the smoke line to get to the lowest point then crawl to escape;
 - b. Take short breaths; breathe through your nose;
 - c. Place a shirt or a wet rag over your nose and mouth, if possible;
- 11. Employees will assemble at the Muster Point until "ALL CLEAR" is given or until directed to do otherwise;
- 12. Listen for instructions and follow them; DO NOT return to the substation for personal items; DO NOT run or create panic; DO NOT go to your car, or leave the premises;
- 13. If the SM present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
- 14. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.



ELECTRIC SHOCK

- 1. In the event that an employee receives electrical shock, work at the location shall be stopped immediately.
- 2. DO NOT attempt to rescue the injured employee unless you know and verify no risks remain.
- 3. Electrical contact can cause muscle contraction, preventing the victim from releasing their grip on an electrical source.
- 4. Rescuing a shock victim at elevation or in the presence of high voltages is likely to require specialized training and tools to do safely. Don't attempt any rescue if you are not confident you can do so safely. DO NOT touch the injured employee
- 5. Remote isolation of the equipment should be requested, completed, and confirmed.
- 6. If de-energization is impossible, you may need to remove the victim from a live conductor. While this is never desirable, hazards can be controlled by utilizing tooling that won't conduct electricity (such as a wooden broom handle) to move the victim and donning insulating gloves and overshoes before attempting rescue if they are available.
- 7. If the only source of power to the victim's locale is a power cord or extension cord to portable equipment, simply disconnecting it at the power source may be sufficient. However, a trip to the breaker box to open the circuit may be necessary.
- 8. Call the SM. The SM will manage the incident.
- 9. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 10. Rescues are safest when the power is off, and you are standing on insulating material. Do not touch a shock victim unless you know the source of electricity that incapacitated them is powered down. If there is a risk of a neck injury or similar contingency, do not move the victim at all. Make sure the victim's airways are clear of obstruction, check for breathing and a pulse and provide CPR if necessary (provided you have been CPR trained).
- 11. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.



EXPLOSION

- 1. In the event of an explosion, affected employees shall immediately stop working.
- 2. Activate the fire alarm and alert all employees at effected location.
- 3. Alert all others present, and if time permits, place equipment in a safe condition.
- 4. Prohibit access to the affected area to other employees;
- 5. The person discovering the explosion shall immediately get the GPS coordinates the exact location, the size, the source of the explosion and the nature of any involved hazardous material, if relevant.
- 6. If the source of the explosion is hazardous material, the Notifier must get the SDS in order to inform emergency personnel of the substance they will have to neutralize.
- 7. Call the SM. The SM will manage the incident and implement the site fire plan if applicable.
- 8. The SM shall contact 911 (if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 9. Employees, contractors, and first responders shall at no time attempt to extinguish or fight a fire due to an explosion. The employee or contractor role is to notify the SM and lead first responders to the scene.
- 10. The SM must ensure that no one was injured by flying debris and the debris didn't cause damage immediately threatening to life. An area of at least 500 meters from the blast site shall be investigated to verify any damage.
- 11. Employees must assemble at the Muster Point until "ALL CLEAR" is given or until directed to do otherwise.
- 12. Listen for instructions and follow them; DO NOT return to building; DO NOT run or create panic; DO NOT go to your car or leave the premises.
- 13. All employees, contractors and visitors shall remain clear of area and structures until an all-clear notice is received from fire-fighting personnel.
- 14. If the SM is present, he/she will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
- 15. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.



8. LIFE THREATENING EMERGENCY MEDICAL

INJURY / ILLNESS – GROUND

- 1. In the event of an injury/illness requiring medical treatment, stop work. If time permits, place equipment in a safe condition, and alert others present.
- 2. The person discovering the injury/illness shall call 911 if condition is serious.
- 3. First aid may be administered, if trained and experience personnel are available at the accident location.
- 4. Unless a tower rescue is involved, do not move the injured or ill person.
- 5. Try to make them comfortable.
- 6. If the incident implies Hazardous Material, the Notifier must get the Safety Data Sheet (SDS) in order to inform the rescuer or the first responders of the substance they will have to neutralize.
- 7. Call the SM. The SM will manage the incident
- 8. The SM shall contact 911 (or relevant local authority as appropriate, if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 9. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.



TOWER EMERGENCY RESCUE

- 1. In the event of a medical emergency while up tower, work shall immediately be stopped.
- 2. Immediately notify the SM.
- 3. Address any potentially hazardous situations for rescuers (i.e. turbine yawing, pinwheeling, etc.).
- 4. To the maximum extent that your training and knowledge allow, treat the victim.
- 5. If victim is able to safely remove himself from the tower, immediately begin a supervised descent of the tower. Do not leave the injured alone.
- 6. The SM shall contact 911 (if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
- 7. If the incident implies Hazardous Material, the SM must get the Safety data sheet (SDS) in order to inform the rescuer or the first responders of the substance they will have to neutralize.
- 8. The SM shall notify all other employees on the site who are trained in tower rescue. All employees shall acknowledge the emergency, and as quickly as safely possible respond to the tower where the emergency is located.
- 9. If safe, the senior rescuer at the tower coordinates the response of the rescuers.
- 10. Refer to the tower rescue procedure for specific response guidelines. In general, one person remains at the base of the tower while all over capable rescuers ascend the tower to assist in the rescue.
- 11. Once the injured is on the ground, ensure that first responders and medical services have prompt access to them.
- 12. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.



9. CRIMINAL BEHAVIOR

It is the responsibility of all employees, contractors and visitors to immediately notify the SM of sabotage, potential sabotage or suspicious activity.

SABOTAGE OR SUSPICIOUS ACTIVITY

- 1. In case of sabotage or suspicious activity, call the SM.
- 2. The SM will call 911
- 3. If sabotage occurs at generating units, transmission facilities, electric collection systems, the operational telecommunication, or control devices associated with generating units, transmission facilities, or electric collection systems the SM shall report the occurrence to OCC and HSE.
- 4. Do not confront or attempt to detain trespassers or attempt to intervene with suspicious activities. If an immediate threat exists, contact 911 (if not already done)
- 5. Investigation into suspicious individuals may require conversation with the individual to ascertain that person's connection with the site. At no time should any confrontation be allowed. If suspicious individuals seem hostile or violent, employees shall leave the area and inform the SM.
- 6. Complete the Accident / Incident Report

EMPLOYEE, CONTRACTOR OR VISITOR

Confrontational situations between employees, contractors, or visitors involving threats, harassment, confrontations or obscene acts or language shall be reported immediately to the SM.

THIRD PARTY THREATS TO FACILITIES

- 1. In the event there is a threat to employees or the site, immediately STOP WORK, alert all others present, and if time permits, place equipment in a safe condition.
- 2. Call the SM to initiate the Evacuation Procedure
- 3. Call 911 for assistance.
- 4. Once all employees have been accounted for, the SM will report the site evacuated to authorities.
- 5. Upon "ALL CLEAR" notification from law enforcement, employees may return to site facilities.
- 6. Complete the Accident / Incident Report and place a phone call to the HSE Manager.



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ACTIVE SHOOTER

- 1. In the event of an active shooter, affected employees shall immediately stop working.
- 2. Call 911 (from an area of safety or concealment) and provide as much of the following information as possible:
 - a. Description of suspect(s) and possible location.
 - b. Number and the types of weapons.
 - c. Suspect's direction of travel.

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- d. Location and condition of any victims.
- 3. Evacuate If there is an accessible escape path, attempt to evacuate the premises. Be sure to:
 - a. Have an escape route and plan in mind.
 - b. Evacuate regardless of whether others agree to follow.
 - c. Leave your belongings behind.
 - d. Help others escape, if possible.
 - e. Prevent individuals from entering the active shooter area.
 - f. Keep your hands visible.
 - g. Follow the instructions of any police officers.
 - h. DO NOT attempt to move wounded people.
 - i. Call 911 when you are safe.
- 4. Hide If evacuation is not possible, hide. Your hiding place should:
 - a. Be out of the shooter's view.
 - b. Provide protection from gunshots, such as behind a heavy desk.
 - c. Not trap you or restrict your options for movement (broom closet).
 - i. Lock the door;
 - ii. Block the door;
 - iii. Silence cell phones;
 - iv. Remain Quiet.

5. FIGHT – If no other options exist, and there is imminent/immediate danger to yourself, take direct action against the shooter:

- a. Remain calm.
- b. If you have not already done so, call 911 and leave the line open.
- c. Commit to your actions.
- d. Act as aggressively as possible against the shooter.
- e. Move with speed and force. Improvise weapons if time permits.
- f. Continue to fight until the shooter is physically incapacitated.
- 6. Once shooter is incapacitated leave the area immediately, taking as many people as possible with you.
 - a. Keep hands visible.
 - b. Do not group together once outside the building, in the event of a second shooter.
 - c. Follow all commands of law enforcement officials.
- 7. Regroup When possible and safe to do so, account for all personnel and report this information through one person to law enforcement. Conduct a roll call.
- 8. Report As soon as possible and practical, report the incident through the EDFR reporting chain (immediate Supervisor, site manager, and Area Manager).



BOMB THREAT

- 1. A bomb threat should never be taken lightly; though experience shows that most bomb threats are false alarms. EDFR will consider all bomb threats to be valid.
- 2. Under no circumstances are employees allowed to engage in any physical search activities.
- 3. Under no circumstances are employees allowed to enter the building site, until condition is deemed safe by authorities.
- 4. The use of electrical equipment, radio communication devices, pager or cell phones should be avoided because they produce waves that could trigger the detonation of the bomb. Keep cell phones and pagers closed.
- 5. When initial threat is received / discovered, gather as much information as possible from the caller using the protocols outlined in the BOMB THREAT INFORMATION LIST. APPENDIX 3 Bomb Threat Information List.
- 6. Stop Work! Notify all employees
- Follow building / Site evacuation procedures and reconvene at defined Muster Location. See APPENDIX 2 Overall Site Map
- 8. Call 911 to report the threat and follow instructions given by authorities and cooperate with local officials.
- 9. Call HSE Manager as soon as possible to report the event.
- 10. Employees must not make statements to the press regarding bomb threat incidents. Refer to 12.9 Media Instructions.
- 11. All employees must remain at assembly areas until "ALL CLEAR" is given by the SM or until directed to do otherwise.
- 12. Complete the Accident / Incident Report and place a phone call to the HSE Manager.



REVISION 3 PUBLISHED Jan 2020

10. SEVERE WEATHER, MONITORING, AND RESPONSE PROCEDURES

Severe weather includes, but is not limited to, strong winds, lightning, hail, ice, snow storms, and tornadoes.

Please refer to the Working in Extreme Weather and Environmental Hazards Procedure.

STRONG WINDS

- 13. If possible, objects and equipment that may be carried by the wind should be transferred to a building or secured.
- 14. Ensure that the emergency brakes are applied on all vehicles.
- 15. Cover electrical equipment with tarpaulins.
- 16. All staff must go inside a building or a shelter.
- 17. Be prepared in case of a power outage.
- 7. The SM shall monitor weather to provide advance warning of potential strong wind conditions.

LIGHTNING

- 1. See procedure Working in Extreme Weather and Environmental Hazards Procedure
- 2. No one shall commence a climb during a lightning event.
- 3. The SM shall issue an "All Clear" notice when no lightning has been detected at the work site within 30 miles for 30 minutes. An all clear will also be given when the lightning is greater than 60 miles from the site for 30 minutes.
- 4. If evacuation is necessary, use the emergency escape routes. See Appendix 2 Overall Site Map

FLOOD

- 1. When a flood occurs, immediately STOP WORK, alert all others present, and if time permits, place equipment in a safe condition
- 2. Stay current with the weather conditions; Listen to the radio or check via internet for current information in your area.
- 3. Call your SM
- 4. Notify the HSE Manager
- 5. Watch for distant thunderheads, for likely source of flash floods.
- 6. Notify your employees via radio, intercom, or phone.
- Cooperate with local officials. Respond to requests for assistance from local police, firefighters and relief workers.
 ON THE ROAD

1. If you are "downhill" from thunderstorm activity, be prepared to stop on high ground. Water-filled highway dips are difficult to see while driving.

- 2. Drive at a moderate speed and monitor other vehicles around you.
- 3. If your vehicle stalls in a water, abandon the vehicle and move to higher ground if safe and possible. Later walls of water may engulf your vehicle.
- 4. Turn on emergency flashers and do not return to your vehicle until it is safe to do so.
- 5. DO NOT attempt to cross a stream where water is above your knees.
- 6. DO NOT try to drive over a flooded road. The water can be much deeper than it appears, and you could be stranded or trapped.
- 7. DO NOT try to drive around lawfully placed barricades.
- 8. Stay away from drains and ditches that may have the opportunity to collapse.
- 9. When driving into areas where flash floods are possible, inform someone of your itinerary and expected time of return. Stick with you plan and check in when you return.
- 10. Carry a portable radio or use your cell phone to keep alert to weather conditions.
- 11. If your vehicle is damaged or stalled, stay near it on high ground Search and rescue parties will locate a vehicle more quickly than a person.

OFFICE OR FACILITY

If you must evacuate, you should do the following if it is safe to do so, and time permits:

- Move essential items to an upper floor.
- Turn off utilities at the main switches or valves, if instructed to do so.

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- Disconnect electrical appliances.
- Do not touch electrical equipment if you are wet or standing in water.

Employees and contractors shall make safe, any equipment being worked on, exit the field and meet at the designated inside assemble area (if possible).

If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.

If evacuation is necessary, use the emergency escape routes. Appendix 2 – Overall Site Map Complete the Accident / Incident Report and place a phone call to the HSE Manager.



WINTER STORMS / ICING / HAILING / FREEZING RAIN

- 1. The SM shall monitor ice potential to provide advanced warning of potential icing conditions or winter storms.
- 2. Employees shall stay aware of potential weather conditions by using weather monitoring provider advanced warning notifications.
- 3. If a winter storm or blizzard warning is issued by third party weather information provider, the SM or designee shall notify all employees adverse weather conditions exist within a 30-mile radius and shall issue a warning to employees and contractors in the field upon which all personnel shall stop work.
- 4. Employees and contractors shall make safe any equipment being worked on (if possible), exit the field and meet at the inside assembly area.
- 5. If evacuation is necessary, use the emergency escape routes. See Appendix 2 Overall Site Map

TORNADO / HURRICANE

- 1. The SM shall monitor the weather to provide advanced warning of potential tornado generating conditions to employees and contractors prior to starting field work.
- 2. If a tornado watch is issued through a weather service, this means a tornado is possible.
- 3. The SM shall call employees at the facility site, via radio, cell phone or any other available means to alert them of a tornado watch. The weather monitor or SM shall issue a tornado watch to employees and contractors in the field. The SM shall ensure receipt of tornado watch by employees and contractors in the field and issue an instruction to Stop Work.
- 4. Employees shall make safe any equipment being worked on (if possible), exit the field and meet at the designated inside assembly area. If a tornado warning is issued this means that a funnel cloud has been spotted or is strongly indicated on radar. The SM shall issue an immediate instruction to reach the O&M building. People will meet in the reception area for head count and seek shelter in the designated tornado shelter.

The following should be briefed to employees during the tailboard meetings in storm season.

If employees and contractors are unable to reach a designated shelter, the following actions shall be taken:

- If in a building, go to interior rooms and halls on the lowest floor. Stay away from glass-enclosed places or areas with wide-span roofs such as warehouses. A corner is safer than the middle of the wall. A bathroom, closet, or room with short length walls is the safest area, especially if on the north or east side of a building. Crouch down and cover your head.
- If in a vehicle, do not try to speed away from a tornado. Tornadoes can change direction quickly and can lift a car or truck and toss it through the air. Get out of the vehicle immediately and take shelter in a nearby building. If there is no time to get indoors, get out of the car and lie in a ditch or low-lying area away from the vehicle and protect your head with your arms. Be aware of the potential for flooding. If in a turbine, employees and contractors shall descend immediately and take cover on the floor of the turbine or turbine basement, if available. Do not attempt to drive to a building.

After a tornado has passed through the facility, the SM shall issue an "All Clear" notice.

Employees, contractors and visitors will meet at the inside assembly area for roll-call. All employees, contractors and visitors shall be accounted for before anyone leaves the facility.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

Complete the Accident / Incident Report and place a phone call to the HSE Manager.

EARTHQUAKE WHILE IN A TURBINE

- 1. If an earthquake occurs while you are in the nacelle, immediately stop work, alert all others present, and if time permits, place equipment in a safe condition.
- 2. You are safe in a turbine during an earthquake. Remain in the nacelle until the earthquake stops. Avoid using the ladder during the earthquake.
- 3. Once the shaking stops, immediately evacuate the turbine.
- 4. Once on the ground:
 - a. Get into the open.



- b. Stay clear of power lines.
- c. Move away from buildings, streetlights and utility wires.
- d. Avoid roads and bridges or ramps that may have been damaged by the earthquake.
- e. If near the ocean or water, reach high ground or go inland.
- f. If possible, employees shall make safe any equipment being worked on, and meet at the designated inside assembly area.
- 5. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
- 6. Complete the Accident / Incident Report and place a phone call to the HSE Manager.

EARTHQUAKE WHILE ON THE GROUND

- 1. If an earthquake occurs while employees or contractors are working on the ground, immediately stop work, alert all others present, and if time permits, make safe any equipment being worked on, shut the gas and electricity off.
- 2. If indoors:
 - a. MINIMIZE your movements to a few steps to a nearby safe place.
 - b. DROP to the ground.
 - c. Take COVER by getting under a sturdy table or other piece of furniture.
 - d. HOLD ON until the shaking stops.
 - e. If there isn't a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building or under the door frame.
 - f. Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.
 - g. Use a doorway for shelter only if it is in close proximity to you and if you know it is a strongly supported load bearing doorway.
 - h. Stay inside until the shaking stops and it is safe to go outside;
 - i. DO NOT use elevators.
- 3. If outdoors:
 - a. Get into the open.
 - b. Stay clear of power lines.
 - c. Move away from building, streetlights and utility wires.
 - d. Once in the open, stay there until the shaking stops. The greatest dangers exist directly outside buildings, at exits and alongside exterior walls.
 - e. Check for ground movement.
 - f. If in a moving vehicle STOP as quickly as safety permits and stay in the vehicle. Avoid stopping near or under buildings, trees, overpasses, and utility wires.
 - g. Proceed cautiously once the earthquake has stopped.
 - h. Avoid roads and bridges, or ramps that might have been damaged by the earthquake.
- 4. If near ocean or water, reach high ground.
- 5. If trapped under debris:
 - a. DO NOT light a match.
 - b. DO NOT move about or kick up dust.
 - c. Cover your mouth with a handkerchief or clothing.
 - d. Tap on a pipe or wall so rescuers can locate you.
 - e. Shout only as a last resort, as shouting can cause you to inhale dangerous amounts dust.
- 6. After the shaking stops
 - a. Attempt to contact employees and SM to report alive and safe.
 - b. Call 911, if assistance is needed.
 - c. Attempt to locate employees needing help and report your co- workers alive to the SM.
 - d. Call for help for yourself and/or co-workers, if needed.
 - e. If possible and safe, attempt to reach the MUSTER POINT.

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- 7. If the SM is present, he/she will perform a roll call to confirm all personnel are accounted for, if not, process the roll call on your own.
- 8. Complete the Accident / Incident Report and place a phone call to the HSE Manager.



11. ENVIRONMENT

For purposes of the EPRP, a spill is defined as the unintentional release of any chemical in excess of 15 gallons, regardless of location, hazard rating or surrounding circumstances.

SPILLS – HAZARDOUS OR NON-HAZARDOUS MATERIAL

If a spill occurs, immediately Stop Work, alert all others present, and if time permits, make safe any equipment being worked on.

- Confine the spill, prevent chemical from spreading and entering the drainage system. Stop the spill from becoming worse by shutting down pumps, closing valves or clamping broken hoses;
- Try to contain the spill from spreading further through diking or other means;
- Add neutralizing agents and/or absorbents;
- Inform the SM.
- Be prepared to show the SDS.

DO NOT attempt to handle any spilled material that you cannot identify (assume it is hazardous)

Complete the Spill Report and place a phone call to the HSE Manager.



12. MEDIA

EDF Renewables recognize that it is essential to present accurate information to the news media concerning an emergency situation involving any of our sites or facilities.

- 1. You are not permitted to give any information, good or bad, to the media.
- 2. The SM will contact the EDFR communications team to speak with the media.
- 3. If a journalist or any other person that is not an authorized person ask you a question, you must politely and professionally answer: Please contact the Site Manager. He/she will give the name and phone number of the person in charge of communications.

REFERENCES

ECRM (FDCC)

- Form, FO5473 Facility Inspection Checklist
- Form, FO0105 EPRP Contact Form
- Form, 5385 Course Critique

EXTERNAL

- OSHA 1910.38 Emergency Action Plan Requirements
- Alberta, Occupational Health and Safety Code;
- Canada Occupational Health and Safety Regulations;
- CSA Z731-03 (R2014)- Emergency Preparedness and Response Standard;
- NFPA 1, Fire Code:
- NFPA 10 Portable Fire Extinguishers
- Ontario, Occupational Health and Safety Act
- Quebec, Regulation respecting occupational health and safety

DOCUMENT HISTORY

Rev #	R&E ID	Author	Owner Approval	Date	Update Notes
0	-	Solange McElreavy Consulting	Darin Rouse	3/8/2015	New Document
1	-	Beth Beaudet	Darin Rouse	9/3/2016	-
2	-	Chris Lenda	Amber Bell	11/7/2017	Updated contact numbers, responsibilities, supervisor references & added additional location fields.
3	-	Chris Lenda	Amber Bell	1/15/2019	Added data and form tracking requirements. Removed pictograms, streamlined document, clarified references.
4	-	Mike Smith	Amber Bell	12/30/2019	Add fire prevention section & appendix.

DOCUMENT PROPERTIES & APPROVAL HIERARCHY (CLICK TO COLLAPSE OR EXPAND AS NEEDED)



APPENDIX 1: FLOOD HAZARD MAP

(Insert flood or earthquake map, if any)



APPENDIX 2: OVERALL SITE MAP AND EVACUATION ROUTES

(Insert map, if any)

APPENDIX 3: BOMB THREAT INFORMATION LIST

WHEN BOMB THREAT IS RECEIVED

- 1. Listen
- 2. Be calm and courteous
- 3. Do not interrupt the caller
- 4. Obtain as much information as possible
- 5. Complete this form and give it to your supervisor

EXACT WORDING OF THREAT

TELEPHONE CALL INFORMATION

DATE	TIME	DURATION OF CALL
	🗆 AM 🗆 PM	

QUESTIONS TO ASK

What time is the bomb expected to explode?	
Where is it?	
What does it look like?	
Where are you calling from?	
Why are you placing a bomb here?	
What is your name?	

IDENTIFYING CHARACTERISTICS

Gender	□ Male	Female	□ Not Sure	
Estimated Age	[] ENTER AGE	□ Adult	Young Adult	🗆 Teen
Accent	English	French	🗆 Spanish	□ Other
Voice	□ Loud	□ Soft	□ Other	□ Other
Speech	□ Fast	□ Slow	Normal	□ Other
Diction	Normal	🗆 Nasal	🗆 Lisp	□ Other
Manner	Emotional	□ Calm	🗆 Vulgar	□ Other

OBSERVATIONS

Background noises	
Voice was familiar (specify)	
Caller was familiar with area	

THREAT RECIPIENT'S PARTICULARS

Name	Phone Number



APPENDIX 4: MAP OF THE DIRECTIONS TO THE MEDICAL CARE CENTER

(Insert map, if any)



APPENDIX 5: GPS

Substation Name	Latitude (N)	Longitude (W)

O&M Building	Latitude (N)	Longitude (W)

Solar Site Name	Latitude (N)	Longitude (W)

Meeting Point	Latitude (N)	Longitude (W)

Muster Point	Latitude (N)	Longitude (W)

Equipment Number or Identifier	Latitude (N)	Longitude (W)



Equipment Number or Identifier	Latitude (N)	Longitude (W)



Equipment Number or Identifier	Latitude (N)	Longitude (W)



Equipment Number or Identifier	Latitude (N)	Longitude (W)



Equipment Number or Identifier	Latitude (N)	Longitude (W)



Equipment Number or Identifier	Latitude (N)	Longitude (W)
1	1	



APPENDIX 6: EMERGENCY COMMUNICATIONS



Tier 5

Tier 4



APPENDIX 7: FIRE PREVENTION PLAN

This plan includes references to relevant EDFR-AO Work Instructions.

The FACILITY OPERATING PLAN must state the existence or lack of existence of this plan.

- 1. Fire Response Entities Consulted
- 2. Weather and Fire Condition Monitoring
- 3. Operations Actions/Restrictions During High Fire Risk
- 4. Defensible Space Plan
- 5. Site Shutdown During Active Fire or High Fire Risk
- 6. Alarm/Communication Plan
- 7. Fire Evacuation Plan
- 8. Protection of Personnel and Equipment During Fire



Form EPRP Contact Form

All EDFR Employees

APPROVED

REVISION 1

PUBLISHED Apr 2019

4.3 Risk Level	Standard	Language	Country
N/A	4.7 EMERGENCY RESPONSE	EN	US/Canada/Mexico

Site Name & Address: Street Number, City, State, County			
Emergency Contacts		Contact Name	Phone Number
Site Contact			
EDF Renewables - Operations Control Center (OCC	2)		
Site Manager (Incident Commar	ider)		
Area Manager			
Site Safety Specialist			
HSE Sr. Manager			
HSE Specialist			
HSE Specialist			
HSE Specialist			
Fire / Police / Ambulance			
Emergency Response Contract	or (Spills)		
Client / Owner Representative			
Equipment Manufacturer			
EDFR Director Communications	/ Media		
Regional Hospital or Trauma Ce	nter		
Poison Call Center			
Helicopter Service			
Canada Specific		Contact Name	Phone Number
HSE Specialist (Canada)			
Provincial Spill Center			
Ministry of Environment (MOE)			
Electrical Emergency Responde	er		



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EENA-OEMS-FO0105

REVISION 1

PUBLISHED Apr 2019

DOCUMENT HISTORY

Rev #	R&E ID	Author	Owner Approval	Date	Update Notes
0	-	Chris Lenda	Amber Bell	1/15/2019	New Document. Extracted from EPRP as a standalone form.
1	-	Chris Lenda	Amber Bell	4/29/2019	Updated Canadian block to remove Ontario specific references.

DOCUMENT PROPERTIES & APPROVAL HIERARCHY (CLICK TO COLLAPSE OR EXPAND AS NEEDED)

CERTIFICATE OF SERVICE

I, <u>Luffunbouchereby</u> certify that I have this day served a true and correct copy of the following documents to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota.

- Letter to Emergency Responders and Public Safety Answering Points; and
- Emergency Response Plan.

Docket No. IP-6499/WS-05-1707 Dated this <u>5切</u> day of August, 2020

Mailing List:

Murray County Sheriff's Office Murray County Courts Building 2558 29th St, PO Box 57 Slayton, MN 56172

Murray County Emergency Management 2848 Broadway Ave, PO Box 57 Slayton, MN 56172

Murray County Medical Center 2042 Juniper Ave Slayton, MN 56172

Chandler Fire Department 241 4th Street Chandler, MN 56122 Nobles County Sheriff's Office 1530 Airport Road Suite 100 Worthington, MN 56187

Nobles County Emergency Management 315 Tenth St, PO Box 757 Worthington, MN 56187

Murray County Ambulance 2711 Broadway Ave Slayton, MN 56172



August 5, 2020

Re: In the Matter of the Site Permit Amendment Application for Repowering the Fenton Wind Project in Murray and Nobles Counties

PUC Docket No. IP-6499/WS-05-1707

To Whom It May Concern:

You are receiving this letter in your capacity as an emergency responder and/or Public Safety Answering Points ("PSAP") with jurisdiction over the Fenton Wind Project ("Project") in Murray and Nobles Counties, Minnesota. Fenton Power Partners I, LLC ("Fenton") has submitted an Emergency Response Plan for the Project to the Minnesota Public Utilities Commission eDockets, Docket No. IP-6499/WS-05-1707. A copy of that Emergency Response Plan is enclosed with this letter.

Please feel free to contact me with any questions you may have.

David Sturges EDF Renewables, North America 729 21st Street Chandler, MN 56122 507-677-2369 Work 507-227-9402 Emergency (Mobile) David.Sturges@edf-re.com

Sincerely,

David Sturges