

Emergency Response Plan

Free State Solar Project, LLC

Kansas Sky Energy Center Project Project No. 147658

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LIST OF ABBREVIATIONS

<u>Abbreviation</u> <u>Term/Phrase/Name</u>

1898 & Co., part of Burns & McDonnell

AED Automated External Defibrillator

COD Commercial Date of Operation

CPR Cardiopulmonary Resuscitation

ERP Emergency Response Plan

Free State Free State Solar Project, LLC

O&M Operations and Maintenance

PPE Personal Protective Equipment

Project Kansas Sky Energy Center Project

PV Photovoltaic

SPCC Spill Prevention Control and Countermeasure Plan

Emergency Response Plan

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1.0 INTRODUCTION

1.1 Purpose

1898 & Co., a division of Burns & McDonnell Engineering Company, Inc. (hereinafter called "1898 & Co."), was retained by Free State Solar Project, LLC ("Free State") to prepare this Emergency Response Plan ("ERP"). The plan addresses certain foreseeable emergencies that may be reasonably expected to occur at the Kansas Sky Energy Center Project and the expected response to each such emergency.

Due to the preliminary state of the Kansas Sky Energy Project, this plan will change as the Kansas Sky Energy Center Project advances in design. This plan will be reissued prior to Kansas Sky Energy Center Project's commercial operation date ("COD") with finalized site details, including but not limited to the site plan, evacuation routes, assembly points, road widths and road load ratings. This plan also takes certain assumptions into consideration based on the nature and the location of the facility at the time at which this plan was written.

1.2 Facility Description

The Kansas Sky Energy Center Project (the "Project") is a nominal 159-megawatt DC utility scale photovoltaic ("PV") solar generation project. The Project is proposed to be located approximately 1 mile north of Lawrence, Kansas and is within Douglas County (the "Project Site"). The site shall not be a manned site, but employees shall be on site to perform operation and maintenance or if a problem is detected from a remote monitoring system.

As of the date of this report, the Project location had not been finalized; however, the temporary placeholder address is located at the following address:

Temporary Site Address: 2024 E 1400 Rd, Lawrence, KS

The site map and evacuation routes for the Project will be appended to the plan as Appendix A after the site layout and emergency address are finalized. The ERP will be reissued with the finalized site address, site map, and evacuation routes prior to COD.

1.3 Relationship to Other Plans

This ERP is intended to be used in conjunction with Occupational Safety and Health Act ("OSHA") requirements to provide emergency response management and plans for the Project Site. Safety Data Sheets will be provided in Appendix B prior to COD.

1.4 Plan Review and Revision

A review of the ERP shall be conducted and documented on an annual basis. The O&M Manager shall coordinate with Emergency Management and shall provide new copies of the report to the facility owner, local fire department, emergency response agencies, Douglas County Emergency Management, and the Zoning and Codes office. The plan should also be reviewed and amended whenever there is a change in operation or maintenance that affects the emergency response planning.

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2.0 EMERGENCY RESPONSE MANAGEMENT

2.1 Primary Emergency Response Team

The primary emergency response team identifies the primary onsite and local emergency response service providers, including contact information.

2.1.1 Roles and Responsibilities

The Operations and Maintenance ("O&M") Manager is responsible for ensuring everyone is familiar with the ERP, appointing an appropriate number of personnel to enforce the plan, and acting as a liaison to local emergency responders.

In the event of an emergency at the Project Site, the O&M Manager shall act as the primary emergency contact. All employees shall report the emergency to the O&M Manager unless otherwise indicated. A secondary emergency contact shall assist the O&M Manager by communicating the appropriate emergency protocols to employees and reporting the status of the emergency to local emergency responders. The secondary emergency contact shall be identified prior to the COD. In the event that the O&M Manager and secondary emergency contact are both unavailable during the emergency, employees shall report all emergencies to the off-site Emergency Response Director.

2.1.2 Emergency Response Card

Emergency response cards and maps to the hospital will be posted at the O&M Building and in all service vehicles. Employees shall have the phone number of the O&M Manager in their cellphone. Table 1 provides the names and contact information of the current ERP primary emergency response team in the form of an Emergency Response Card. Prior to the COD, onsite emergency response providers will be finalized, and the report will be reissued with the on-site emergency response providers names, roles, and phone numbers.

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Table 1: Emergency Response Card

On-Site Emergency Response Providers

On-Site Emergency Response Providers				
Emergency Contact	Role	Name	Phone	
Primary	[TBD]	[TBD]	[TBD]	
Secondary	[TBD]	[TBD]	[TBD]	
Off-site Secondary	[TBD]	[TBD]	[TBD]	

Local Emergency Response Providers			
Agency	Address	Phone	Expected Response Time
Douglas County Sheriff's Department	111 E 11 th St, Lawrence, KS 66044	911	5-10 minutes
Lawrence – Douglas County Fire Medical	746 Kentucky St, Lawrence, KS 66044	911	15 minutes
LMH Health Emergency Department	325 Maine St, Lawrence, KS 66044	911	10 minutes
Hazmat, Inc.	6300 Stadium Dr, Kansas City, MO 64129	(855) 242-9236	1-2 days

2.2 Communications

Timely communication is essential during an emergency. For that reason, 1898 & Co. recommends Free State implement the following minimum requirements.

- All employees of the solar facility shall have access to a working cellphone when on the Project Site. All work cellphones shall receive emergency text and call alerts. All employees need to carry or have easy access to a cellphone in case of an emergency. All phones shall be recharged daily.
- If cellphone communications are not clear, plant radios shall be available for use.
- The Project Site shall have weather monitoring equipment to detect lightning and severe weather.
- Remote operations of arrays (shutdowns, etc.) can also be conducted at the O&M Building.
- One employee of the solar facility is always on call. The O&M Manager is available via cellphone 24 hours per day to coordinate emergency responses.

2.3 Emergency Response Equipment

All emergency response equipment shall be maintained and tested as necessary. First aid kits and storm shelter supplies shall be stored at the assembly point and shall be restocked by the O&M Manager monthly. Chemical spills may require assistance from Hazmat to address larger spills. The contact information is included in Table 1.

2.3.1 Personal Protective Equipment

While on the Project Site, all employees shall wear the appropriate personal protective equipment ("PPE"), all of which much be in good condition. At a minimum, employees shall

wear OSHA-compliant steel or composite toed boots, hard hats, ANSI z.87.1 approved safety glasses, work gloves, and approved flame-resistant shirts and long pants. Additional required PPE is dependent on the circumstance and may include goggles, face shields, heat resistant gloves, and 40 cal/cm² suits for additional protection when exposed to high voltage or arc flash scenarios. New hire orientation and ongoing safety training shall address the appropriate PPE for specific situations.

2.3.2 Other Equipment

All tools are stored in tool cages at the O&M building, including shovels, rakes, and absorbent pads and materials. Fire extinguishers are located in the O&M building. A map depicting the locations of all fire exits and fire extinguishers in the O&M building is next to the door in every room in the O&M building. First aid kits are provided in each work vehicle and the O&M building, and they shall be maintained monthly by the O&M manager. An automated external defibrillator ("AED") is located next to the first aid kit in the O&M building and shall be maintained monthly by the O&M manager.

2.4 Operating Site Drills

Proper preparation for evacuations is essential for an emergency response to be performed efficiently and effectively. The O&M Manager shall conductor emergency responses annual drills at the Project Site to ensure employees are prepared to react and respond appropriately during emergency situations. All alarms, notification, and controls will also be tested by the O&M Manager annually.

2.5 Training

All employees of the solar facility shall receive training upon hiring and when the ERP is initially implemented and shall be recertified as necessary. Employees shall receive training on the ERP annually or whenever it is modified, and training will comply with OSHA and National Fire Protection Association standards. The training includes cardiopulmonary resuscitation ("CPR"), first aid, AED, SPCC, and fire safety training.

Contractors and visitors who enter the Project Site shall be informed of ERP procedures before they enter the Project Site for the first time, and at least annually thereafter. If the buildings on the Project Site have an alarm system, each employee, visitor, and contractor shall understand the types of alarms and the procedures performed if an alarm sounds. The safety team shall ensure that all alarms are audible at all buildings.

The O&M Manager shall also include emergency responders in emergency response training and provide additional training to the local fire and police departments on the plan, facility, equipment, and processes in the event of an emergency.

2.6 Signage

Appropriate emergency signage shall be posted throughout the Project Site in high visibility areas to warn employees and visitors of all potential hazards. Signs shall be located along access roads, entrances, O&M Building, and substation. They shall include emergency contact information and codes to aid emergency service workers in locating Project facilities.

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2.7 Reporting

All emergencies, including emergency drills, shall be documented in an event response system. This document shall detail the type of emergency, any injuries that occurred, and the response actions taken. It shall be stored at the O&M Building with a copy of the ERP. After an emergency, the ERP plan shall be re-evaluated by the O&M Manager to address any concerns and improve the response to an emergency.

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3.0 GENERAL EVACUATION PROTOCOL

An evacuation route shall be orally communicated to all employees and posted on a sheet in all buildings and service vehicles. The sheet depicts the assembly points and evacuation routes for certain emergency protocols (i.e., fire, severe storm, chemical release, and bomb threat). The assembly points and evacuation routes should be discussed during safety meetings in addition to new employee training. Due to the preliminary state of the facility, all evacuation routes and assembly points will be finalized prior to COD. The report will be updated and reissued once the evacuation routes and assembly points are finalized.

3.1 Evacuation Routes and Assembly Points

In the event of an emergency, the O&M Manager shall determine whether an evacuation is necessary and which route is appropriate. When notified of an evacuation, all employees shall meet at the assembly point and wait for further instructions. If employees, visitors, or contractors cannot make it to the assembly point, they should seek shelter wherever possible, contact their supervisor, and wait for further instructions.

3.2 Evacuation Procedures

When notified to evacuate, employees shall proceed to the predetermined evacuation route calmly and in an orderly fashion. Employees should keep the following in mind during an evacuation:

- Walk, don't run. Help those who need assistance.
- Drive safely through the smoke, if necessary
- Watch for other traffic and equipment on access roads and roadways
- Be aware of reduced or obstructed visibility (i.e., smoke, snow, rain, tall objects)
- Be aware of icy and loose gravel on roadways

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4.0 FIRE/EXPLOSION

4.1 General Fire/Explosion Protocol

In the event of a fire or explosion at the Project Site, all on-site employees shall take the following actions.

4.1.1 On-Site Employees

Any employee, visitor, or contractor who discovers a fire or explosion at the Project Site shall call 911 and communicate where on the Project Site the fire or explosion has occurred. After reporting the emergency, the person shall immediately contact with the O&M Manager, and provide the following information:

- The location and source of the fire (if known)
- Any injuries that occurred
- Actions the employee should take to extinguish the fire (only applicable if the fire is at the beginning phase and employee is trained)

If the person cannot safely contact anyone using their cellphone, they should immediately go to the nearest building to report the fire or explosion.

If the fire is at the beginning stage and can safely be put out with a fire extinguisher, an employee trained to use the fire extinguisher should attempt to extinguish it. Only employees trained to use fire extinguishers should attempt to extinguish a fire in the beginning stage. Employees are not authorized to respond to fires beyond the beginning stages.

NOTE: Notifying others of the emergency and getting help from trained responders is the most important step to minimize the severity of the emergency. However, if the employee does not have immediate access to a cellphone and discovers a fire in the beginning stage, if trained, the employee may extinguish the fire with fire extinguishing equipment before reporting the incident. If the employee is not trained or the fire progresses to, or is discovered beyond the beginning phase, the immediate response is to notify others over the cellphone and get help.

Once the O&M Manager is notified and employees are waiting for emergency responders to arrive, employees should take the following actions:

- When notified by cellphone, evacuate the building and report to the nearest assembly point. Do not take any personal belongings. Leave all lights on for firemen / emergency responders. If safe to do so, close all doors, but do not lock them.
- Ensure the immediate area of the fire is clear of employees. If safe to do so, rescue any injured employees in surrounding area.
- Remove any obstructions (vehicles, materials, etc.) that might impede response to the fire, if possible.
- Station available employees at road intersections to stop traffic flow into the fire scene.

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4.1.2 O&M Manager

Once notified of a fire or explosion, the O&M Manager shall notify onsite employees, including any visitors, of the emergency by cellphone alerts. They shall account for all employees, contractors, and visitors working in the vicinity of the fire/explosion by cross-checking the sign-in sheet at the O&M building and/or the employee in charge of the scene. The O&M Manager shall also keep in contact with the emergency responders as they report to the location of the emergency.

Upon arriving at the scene of the emergency, the O&M Manager shall evaluate the emergency, implement any precautions to prevent or limit the spread of the fire, and determine if the affected area should be shut down. Solar Equipment can be shut down at the O&M Building. In case of a fire which destroys a power line on individual strings of solar panels may be shut down from the substation by the site manager or qualified electrical contractor.

If non-urgent incidents occur, the O&M Manager shall coordinate the transportation of the person to the hospital and notify the hospital of the incoming patient. See Section 5.0 for more information.

4.2 Fire Located in Surrounding Vegetation

In the event that a fire occurs in the vegetation surrounding the project and it is beyond the beginning stages, the employee shall immediately alert other employees working in the area and prohibit access to the area where the fire is located. The employee shall then immediately call 911 and report the location and status of the fire before notifying the O&M Manager.

NOTE: If caught in fire or heavy smoke, breathe through your nose and crouch under the smoke line to escape. If possible, place a shirt or cloth over the nose and mouth.

4.3 Fire in a Building

If an employee discovers a fire that occurs in a building, the employee shall immediately stop working and activate the fire alarm. The employee shall extinguish the fire with a fire extinguisher if it can be done safely. If the fire has progressed beyond the employee's capabilities, all employees shall evacuate the building and call 911 before notifying the O&M Manager. The employee shall inform the emergency responders that the fire is occurring in a building so the emergency responders can properly prepare for a building fire.

NOTE: If an employee is caught in heavy smoke, the employee shall crouch below the smoke line and crawl to evacuate the area. If possible and safe, the employee should use a shirt or a wet rag over their nose and mouth to block out the smoke.

4.4 Fire Located in a PV System

If an employee discovers a fire that occurs within the photovoltaic ("PV") system, the employee shall stop working immediately, activate fire alarm, and alert other employees working in the area. The employee shall immediately call 911 and report the location and status of the fire before notifying the O&M Manager. The employee shall inform the emergency responders that the fire is occurring in a PV system so the emergency responders can properly prepare for an electrical fire. If possible and safe, isolate and shutdown the PV system at the inverter or by any other reliable method. Employees are to avoid the damaged equipment until given the "all clear" from the O&M Manager.

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4.5 Fire Located in a Substation

If an employee discovers a fire that occurs in the substation, the employee shall stop working immediately, activate fire alarm, and alert other employees working in the area. The employee shall not attempt to fight an electrical fire. The employee shall immediately call 911 and report the location and status of the fire before notifying the O&M Manager. The employee shall also request the isolation of the substation and see that it is completed. All other employees shall assemble at the assembly point until an "all-clear" is given by the O&M Manager.

NOTE: Transformers and capacitors contain flammable /combustible material and employees near these pieces of equipment need to leave the area as these items are potentially explosive.

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5.0 MEDICAL EMERGENCY

In the event of a medical emergency, the person who finds an individual with a severe injury shall immediately call 911 and report the emergency before notifying the O&M Manager. If the injury is minor, the employee shall notify the O&M Manager of the injury. In the event of a minor injury, the O&M Manager shall ultimately determine if an ambulance is required.

5.1 Non-urgent Medical Emergencies

If a non-urgent incident occurs, the O&M Manager will appoint someone to drive the employee to the hospital and will notify the hospital of the incoming patient if necessary. The injured individual must be medically approved for work before being allowed back to work at the Project Site. Safety training will discuss examples of non-urgent and minor injuries and provide situations when contacting 911 immediately is not necessary.

5.2 Urgent Medical Emergencies

If an urgent medical incident occurs, the employee who finds the injured individual shall immediately call 911 and report the situation before notifying the O&M Manager. Urgent medical incidents may include but are not limited to falls, electric shock, and burns. More examples of urgent medical emergencies shall be discussed in safety training meetings.

5.2.1 On-Site Employee

If an employee discovers an injured person on the Project Site, the employee shall immediately call 911 and report the situation before notifying the O&M Manager. A CPR-certified employee should check and perform the following steps as necessary. Other emergency responders should assist in contacting the O&M Manager and emergency responders.

NOTE: If the victim may have sustained any broken bones, a neck or spine injury, or is bleeding significantly, do not move the victim. Make the victim as comfortable as possible and apply pressure to minimize bleeding until medical personnel arrive.

5.2.1.1 Unresponsive Victim

If the victim is unresponsive, the CPR-certified employee should perform CPR/AED procedures as required:

5.2.1.2 Responsive Victim

If a responsive victim is found, the injury shall immediately be reported to the O&M Manager. As noted above, the victim should not be moved if they have serious injuries. Before moving a victim, a trained employee should immobilize all injured parts of the victim. Unless moving the victim is necessary, the employees should wait for the local emergency responders to arrive on-site before attempting to move the victim.

5.2.2 Electrical Shock

If an individual is injured by an electric shock, an employee should immediately turn off the source of the electricity, if safe to do so. The employee should not touch the injured individual until after the power has been turned off.

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The employee shall immediately call 911 and report the situation before notifying the O&M Manager. The employee shall report the accident to the O&M Manager and request an AED, regardless of the victim's condition. A CPR-trained employee should initiate CPR and use the AED as needed. First aid should be given until the local emergency responders arrive.

5.2.3 O&M Manager

Once they are notified of the emergency, the O&M Manager shall report to the location of the emergency to emergency responders. They will locate and direct an employee to provide an AED and first aid kit as needed. The O&M Manager shall remain in contact with emergency responders once they arrive on site until they arrive at the location of the emergency.

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6.0 SEVERE WEATHER

Severe weather can occur suddenly even when weather is monitored. The O&M building monitors the surrounding area with weather satellites, and operators shall notify the O&M Manager and employees of the severity of inclement weather and appropriate protocol.

When there is 1 to 24 hours of notice of a severe storm warning, employees shall follow these steps:

- Secure all materials and equipment
- Lock office trailers and builders
- Monitor storm and, if necessary, evacuate

6.1 Lightning

Solar farms utilize metal equipment which can be dangerous when lightning is present. To remain safe during a storm, employees are required to follow protocol when inclement weather approaches the Project Site.

6.1.1 Level 1 Alert (Within 30-mile radius)

When lightning is confirmed within 30 miles of the Project Site, all employees shall receive a Level 1 alert on their cell phones. Employees currently working should be prepared to stop work by securing all materials and equipment. Employees should evacuate the area if the storm moves closer. Any employees about to start working should wait until the storm passes and the "all clear" by the O&M Manager is given before beginning work.

6.1.2 Level 2 Alert (Within 15-mile radius)

A Level 2 alert shall be sent out when lightning is confirmed within 15 miles of the Project Site. All employees shall stop working immediately, refrain from using metal equipment, and seek shelter, if necessary, until the storm passes. An "all clear" shall be given by the O&M Manager when lightning is further than 30 miles for more than 30 minutes.

6.1.3 Level 3 Alert (Within 10-mile radius)

A Level 3 alert shall be sent out when lightning is confirmed within 10 miles of the Project Site or thunder is heard at the Project Site. All employees shall stop working immediately, refrain from using metal equipment, and seek shelter, if necessary, until the storm passes. An "all clear" shall be given by the O&M Manager when lightning is further than 30 miles for more than 30 minutes.

6.1.4 General 30/30 Rule

If the employee cannot receive lightning alerts, they must follow the 30/30 rule: if they hear thunder 30 seconds after seeing lightning, they shall immediately seek shelter in the nearest shelter and wait 30 minutes after the last time they hear thunder before resuming work.

6.1.5 On-Site Employees

Once notified of a lightning alert, all employees should follow the protocol detailed above. If inside a shelter, employees should take the following steps:

• Stay away from doors, windows, and water.

• Turn off and unplug electrical appliances (i.e., computers, power tools). If appliances cannot be unplugged, stay away from them.

If an employee is outside, they shall take shelter in vehicles or trailers. If a shelter is not nearby, employees shall take the following steps:

- Crouch down with both feet together. Do not lie down or place hands on the ground.
- Do not stand near other people. Keep a minimum distance of 15 feet apart.
- Contact the O&M Manager and provide the location on the Project Site

Employees shall immediately call 911 and notify the O&M Manager of the lightning strike. Trained employees should administer CPR and first aid to the lightning victim if necessary.

6.1.6 O&M Manager

Once the O&M Manager is notified by an operator of lightning within 50 miles or sustained winds over 30 mph (15 m/s) on the Project Site, they shall send out an alert and notify all employees of the necessary protocol. If the lightning is suspected to be within 30 miles, the O&M Manager shall seek shelter, monitor the location of the lightening and contact any employees still out on the Project Site of the type of alert that is in effect.

If any employees must remain on the Project Site through a storm, the O&M Manager shall check in with the employee after the storm passes. If an employee is injured, the O&M Manager shall follow the appropriate medical protocol.

6.2 High Winds

When high winds occur at the Project Site, work around the equipment shall not continue in order to keep employees and the Project safe. Once the O&M Manager gives the "all-clear", work can resume as normal,

6.2.1 On-Site Employees

If high winds occur, all on-site employees shall seek shelter and secure any loose equipment immediately. Even if no high-wind alerts are issued, the employee should assess the situation and determine if it is safe to work.

6.2.2 O&M Manager

Once notified of the high winds, the O&M Manager shall issue an alert to all employees on the Project Site of the wind speed and shall indicate which work will be put on hold. Once the winds subside, the O&M Manager will give an "all-clear" through cellphone alerts to all employees.

6.3 Tornadoes

The following protocols shall be implemented to mitigate the danger posed by a tornado. If an employee is not receiving weather alerts by cellphone or siren, they shall immediately take shelter if they see these signs of danger: dark and greenish skies, large hail, rotating low-altitude clouds, and/or loud roar. The O&M Manager shall identify tornado shelters in the area during orientation and annual safety training.

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6.3.1 Watch Issued

The National Weather Service will issue a watch when the conditions are favorable for a tornado. If a tornado watch is issued, the O&M Manager shall alert the on-site employees of the watch, and the employees shall begin storm preparations.

6.3.1.1 On-Site Employees

When notified of a tornado watch, employees working out on the Project Site shall store small equipment and materials inside buildings. No loose tools or equipment shall remain outside. Once all equipment is stored, all employees shall immediately stop working and report to the closest designated tornado shelter. Once at the shelter, all employees shall contact the O&M Manager.

6.3.1.2 **O&M Manager**

When the National Weather Service issues a tornado watch, the O&M Manager shall immediately alert all on-site employees that a watch is currently in place on the Project Site. The O&M Manager shall also inform all off-site workers to remain at home until the tornado watch ends. They shall monitor radio, television, and on-site weather equipment for updates on the storm and shall periodically update employees of important changes to the situation.

6.3.2 Warning Issued

A warning is issued when a tornado has been detected by the National Weather Service either through a sighting or radar. If a warning is issued, a tornado is in the immediate area, and people shall immediately take shelter.

6.3.2.1 On-Site Employees

Once notified of a tornado warning, employees shall immediately seek shelter at the closest designated tornado shelter and contact the O&M Manager for further instructions. If safe to do so, they should turn off all electricity and other utilities.

If employees cannot safely report to a designated tornado shelter, they shall be instructed to report to the nearest building or structure and remain in contact with the O&M Manager.

6.3.2.2 **O&M Manager**

When the National Weather Service issues a severe weather or tornado warning, the O&M Manager shall immediately notify all on-site employees of the warning and instruct them to report to the nearest designated tornado shelter, if applicable. They shall inform all employees to shelter in place until the "all-clear" is given. The O&M Manager shall account for all employees currently working on the Project Site, and they shall notify all off-site employees to remain at home until the storm passes. The Manager shall continue to monitor the storm through radio, television, and the National Weather Service. All PV System equipment, electricity, and other utilities shall be shut off until an "all-clear" is given by O&M Manager.

6.3.3 After the Storm

Roads may be blocked by fallen objects and debris from the storm. The O&M Manager shall remain informed about the weather. Depending on the severity of the storm, access to the Project Site may initially be limited to search and rescue personnel, law enforcement, firefighters, utility crews, and road clearing teams. Once the O&M Manager receives the "all-

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clear" from the National Weather Service or local officials, the employees may exit the shelter and shall take the following actions:

- Look for obvious structural issues in any buildings, solar equipment, and roads. Do not attempt to enter any buildings with structural damage.
- Check for downed or dangling electrical power lines. Do not approach or cross damaged power lines.
- Immediately notify the O&M Manager of any damage to the buildings, roads, solar equipment, or power lines on the Project Site.
- Do not attempt to cross any fast flowing or newly formed bodies of water.

6.4 Flash Flood

While the Project Site has no identified wetlands, flash floods are a potential risk.

6.4.1 On-Site Employees

Once on-site employees are notified of a flash flood warning, all employees working in a low-lying area or flood plain shall immediately contact their supervisor and report to the assembly point. During a flash flood or a flash flood watch, employees should take caution when travelling near swollen rivers or waterways, and they should only cross slow-moving, shallow water if they must evacuate. If employees cannot safely reach the assembly point, they should seek high ground and contact the O&M Manager. All employees shall remain at the assembly point or at higher ground until the "all-clear" is given by the O&M Manager.

6.4.2 O&M Manager

Once the O&M Manager is notified of a flash flood warning, the O&M Manager shall put an alert out through cellphone, identifying the emergency and areas in the Project Site that need to seek high ground. The O&M Manager shall account for the location and wellbeing of all employees working on the Project Site during the flash flood warning. When the flash flood warning is no longer in affect, the O&M Manager shall contact all employees on the Project Site and give the "all-clear" to resume work.

6.5 Winter Weather

The Project location gets on average 13 inches of winter precipitation (i.e., snow, sleet, ice) a year. In the event of an unexpected or severe winter storm, the main access roads may not be cleared immediately. The O&M Manager shall ultimately decide if the solar farm shall remain in operation during a storm. The following steps shall be taken by employees during a winter weather storm.

6.5.1 On-Site Employees

If notice of a severe winter weather storm is within 24 hours of the winter storm, all non-essential work shall immediately stop, and all equipment shall be secured. On-site employees shall immediately stop all work and secure all equipment. They shall report to the assembly point and will await evacuation instructions from the O&M Manager.

Off-site employees will be notified by the O&M Manager that they should not come into work. Designated employees will remain on call and will report to work unless they are contacted by the O&M Manager and the storm is too severe.

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6.5.2 O&M Manager

When the O&M Manager has received notice of severe winter weather, the O&M Manager shall notify all employees of the winter storm and shall inform all on-site employees to report immediately to the assembly point. If the driving conditions are acceptable when the employees report to the assembly point, the O&M Manager shall implement the evacuation routes, and all employees shall return home. If the weather is too severe for employees to drive home, they shall take shelter in vehicles in the area they are working in.

6.5.3 After the Storm

The O&M Manager should schedule snow and ice removal for the main access road. Employees should help with snow removal from the walkways and work platforms. Employees shall assess the damage from the winter storm and inform the O&M Manager of any necessary repairs.

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7.0 ELECTRICAL EMERGENCY

7.1 Fallen Power Lines

In the case an overhead power line has fallen, it may still be live and needs to be avoided. An individual shall keep as much distance as possible between them and the fallen power line. Current can travel along the ground, equipment, and surrounding waterbodies or liquid. The employee should ideally remain more than 30 feet away from fallen power lines, if possible.

7.1.1 On-Site Employee

The employee who first discovers the fallen power line shall immediately alert any employees working in the area and stay well away from the fallen power line. The employees shall leave the area if possible and safe. Once reaching a safe location, the employee shall immediately contact the O&M Manager and report the fallen power lines. The employee shall answer the following questions if possible:

- Where is the location of the fallen powerline?
- Is it safe to evacuate?
- Are any individuals injured?
- Are any individuals trapped due to avoiding possible shock?

If the employee is in a vehicle when the line falls, the employee shall stay inside the vehicle. Doors, windows, and anything metal should be avoided while waiting for rescue by trained professionals. If possible and safe, alert other employees in the area to stay away and report the location to the O&M Manager.

7.1.2 O&M Manager

When the O&M Manager receives notice of a fallen power line, the O&M Manager shall notify all employees of the location and instruct employees of any relevant information in order to avoid electric shock. The O&M Manager shall notify the local energy provider and emergency responders of the fallen power line.

7.2 Electric Shock

In the case an employee experiences electric shock, work shall immediately stop in that location due to the risk of electric shock. Employees should not attempt to rescue an individual if they experience electric shock, instead, notify the O&M Manager and follow protocol in Section 5.2.2.

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8.0 SECURITY THREAT

8.1 Bomb Threat

When an employee receives a bomb threat, they should treat the caller with courtesy and respect. The main objective of the employee is to get as much information as possible from the caller while accurately recording every word of the threat message. The employee shall immediately call 911 and report the emergency before notifying the O&M Manager.

Once notified, the O&M Manager shall issue an alert on all radios announcing that all communication through radio should immediately stop. Radio transmissions can activate a detonating or timing device. They shall then instruct all employees to evacuate to the assembly points as necessary. The O&M Manager shall remain in contact with the local emergency responders throughout the emergency and shall coordinate an evacuation.

8.2 Chemical/Biological Agent Threat

The same procedures shall be used as described in Section 8.1 All employees should keep their bodies covered as much as possible, including their nose and mouth, to avoid any skin contact with or inhalation of the dangerous substance.

8.3 Sabotage

Any employee that identifies a severe act or threat of sabotage shall immediately call 911 and report the emergency before notifying the O&M Manager and report the emergency. Once notified of the emergency, the O&M Manager shall instruct all individuals to gather at an assembly point and shall begin the evacuation process, if safe to do so. Examples of severe acts or threats of sabotage shall be covered during new hire orientation and annual safety trainings.

The Project is more likely to experience vandalism, which is minimized by wildlife fencing around the PV system and by chain-link fencing around the substation. All employees that witness vandalism are expected to report this to the O&M Manager to provide a level of security for the Project Site. The O&M Manager shall ultimately determine if the emergency responders are required.

8.4 Cyber Security

The BES-designated low solar generation facility shall implement the required NERC CIP Cyber Security Program to safeguard against cyber threats. All personnel will receive training to recognize indicators of a security breach, and upon identification, they must promptly notify the O&M Provider. The O&M Provider will engage a NERC CIP manager and adhere to the established protocols and guidelines outlined in the Cyber Security Program. The relevant NERC CIP standards that address these requirements are:

- 1. NERC CIP-002-5.1: Cyber Security BES Cyber System Categorization
- 2. NERC CIP-003-8: Cyber Security Security Management Controls
- 3. NERC CIP-004-6: Cyber Security Personnel and Training
- 4. NERC CIP-007-6: Cyber Security Systems Security Management
- 5. NERC CIP-010-3: Cyber Security Configuration Change Management and Vulnerability Assessments

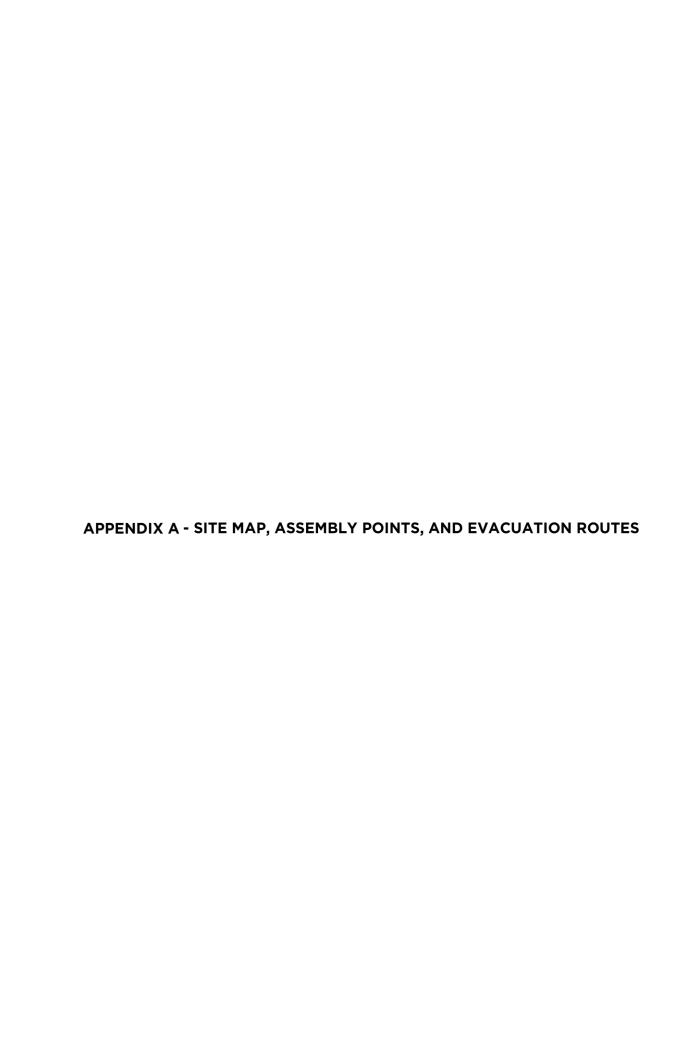
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8.5 Suspicious Object

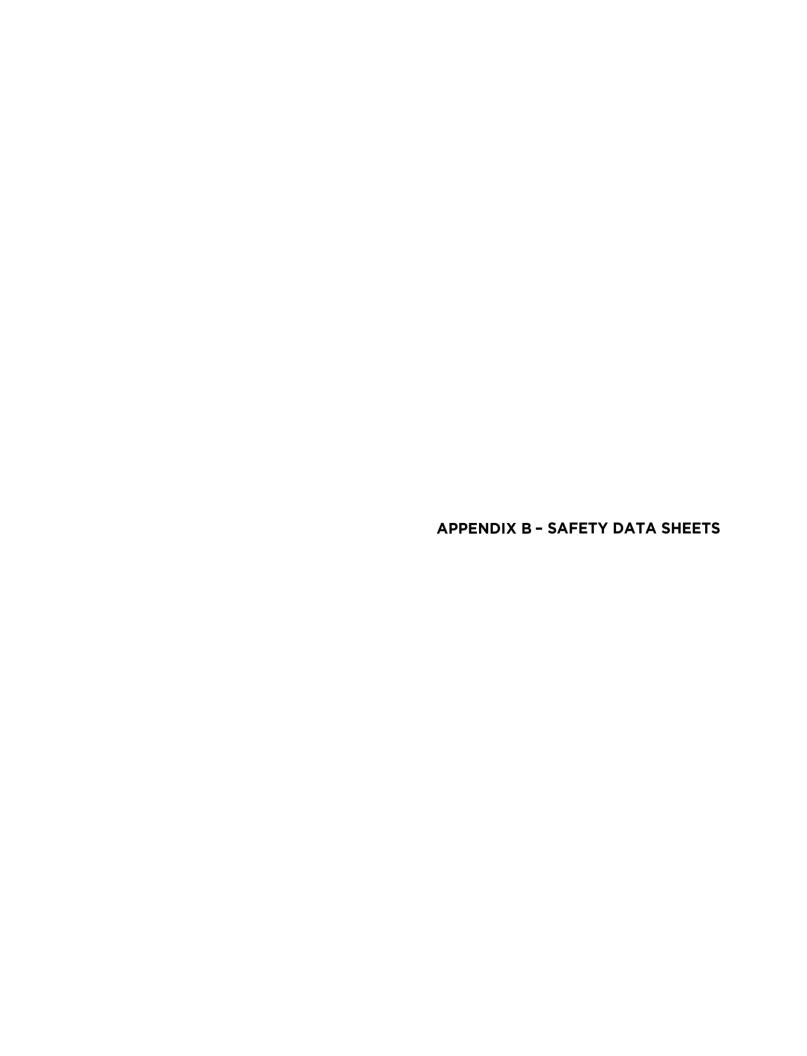
If any employee finds a suspicious object on the Project Site the employee shall immediately notify the O&M Manager. The employee shall not disturb the suspicious object, and if emergency tape is nearby, the employee shall mark the location of the object with a continuous line of tape beginning in front of the suspicious item. The O&M Manager will inform any emergency personnel of the suspicious object.

All employees should be careful when handling suspicious or unsolicited deliveries or letters. The object can spread dangerous chemicals, so employees should treat every suspicious object as dangerous and contact the authorities to examine it under controlled conditions.

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[Site map, evacuation routes, and assembly points will be attached prior to Commercial Date of Operation.]



[Safety Data Sheets for all hazardous chemicals stored on-site will be attached prior to the Commercial Date of Operation.]

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