

CONFIDENTIAL

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**Exhibit S
Turbine Safety Manuals**

- 1. GE Safety Plan (Confidential)**
- 2. Siemens Gamesa Safety Plan (Confidential)**
- 3. Vestas Safety Plan**

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1. GE Safety Plan (Confidential)

Grover Hill Wind, LLC has requested confidential treatment of the GE Safety Plan documents in accordance with OAC Rule 4906-2-21.

These documents contain sensitive financial information and, as such, are entitled to confidential treatment under state and/or federal statutes and regulations.

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2. Siemens Gamesa Safety Plan (Confidential)

Grover Hill Wind, LLC has requested confidential treatment of the Siemens Gamesa Safety Plan in accordance with OAC Rule 4906-2-21.

These documents contain sensitive financial information and, as such, are entitled to confidential treatment under state and/or federal statutes and regulations.

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3. Vestas Safety Plan

This manual was filed in the open record.

Vestas Quality, Health, Safety and Environmental Policy

We are the global partner in sustainable energy solutions. We design, manufacture, install and service wind turbines and associated products across the globe and our mission is to deliver best-in-class energy solutions for the benefit of our customers and the planet. We operate a certified integrated management system to manage risk and drive continuous improvement of business performance through innovation, benchmarking and learning from experience.

We satisfy applicable legal and voluntary requirements and ensure transparency in our quality, occupational health and safety and environmental performance through disclosure of the annual external statement available at [Vestas.com](https://vestas.com)

At Vestas, leadership and management at all levels across value chain is committed to uphold our policy by:

Health and safety:

- Preventing injury and work-related illness by ensuring application of hierarchy of controls to eliminate hazards, wherever practicable and reduce occupational health and safety risks.
- Demonstrating Safety First by prioritising occupational health and safety in developing, planning and execution of our operations, products and services to ensure safe and healthy working conditions and environment
- Engaging our customers, employees, contractors, suppliers, and other stakeholders through dialogue and training to,
 - Meet or exceed the occupational health and safety standards
 - Ensure safety is a pre-requisite of doing business with, in or on behalf of Vestas

Quality:

- Ensuring that all committed customer requirements are met through adherence to process, specifications and procedures in order to achieve Customer Satisfaction.
- Preventing defects by ensuring corporate embedment of proactive quality assurance and data-driven continual improvements, to eliminate error or effectively reduce risks and associated cost of poor quality.
- Delivering a specified level of quality that supports superior product performance at lowest possible cost throughout the entire product life cycle.

Environment:

- Preventing pollution and protecting the environment in everything we do.
- Demonstrating environmental vigilance by having a life cycle approach in developing, planning, and execution of our operations, products and services.
- Engaging our customers, employees, contractors, suppliers, and other stakeholders through dialogue and training to,
 - Meet or exceed the environmental standards
 - Ensure environment protection as a pre-requisite of doing business with, in or on behalf of Vestas

On behalf of Vestas

Henrik Andersen
President and Chief Executive Officer



Wind. It means the world to us.™

Classification: Restricted

QSE Plan			Document ID: 0049-0542 INS SUS-PLN-GOT US/USI QSE Plan
Owner(s): BPO.Del.SUS	Author(s): RIREG	Valid from: 2018.06.26	Version: 02

Version history

Version No.	Date	Description of Changes
02	2018.06.26	Revised Sections 2, 4, 5.2, 5.3 and Branding see grey highlighted text

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1 Purpose

To ensure the company maintains an Occupational Safety, Health and Environmental program that creates a safe work environment for employees and supervised contractors on sites, meets the needs of the communities in which we do business and is compliant with all applicable governmental regulations.

2 References

Document No.	Title
0049-0627	QSE Manual Table of Contents
29 CFR 1910 and 1926	OSHA General Industry and Construction Standards
TPS-PSU-SAL	Safety Alerts
TPS-PSU-SAL	Managing Safety Alerts
INS-SUS-IEM-IMA-SAL	Distribution and Implementation of Safety Alerts and HSE Alerts
SUS-IEM-IMA	Incident Management
0049-2056	US/USI Code of Safe Practices

3 Scope

This procedure applies to all employees, contractors and visitor at all locations.

4 Terms and Abbreviations

Term or Abbreviation	Definition
CFR	Code of Federal Regulations
CPR	Cardiopulmonary resuscitation
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
QSE	Quality Safety and Environmental

5 Responsibilities

5.1 Senior Management:

- 5.1.1 Encourage employee and subcontractor involvement in the safety process.
- 5.1.2 Provide appropriate supervision at worksites.
- 5.1.3 Ensure that all operations including those of subcontractors meet government mandated safety requirements.
- 5.1.4 Ensure performance and behavior meet the requirements of the QSE Program.
- 5.1.5 Communicate with employees, customers, subcontractors, and vendors regarding their corporate commitment to safety.

5.2 QSE Department:

- 5.2.1 Develop and maintain effective written programs for all recognized hazards that employees may be exposed to. Each program will be reviewed regularly and revised as needed based on regulatory or process changes.
- 5.2.2 Communicate each program to all personnel affected by the program.
- 5.2.3 Conduct and document regular audits of all workplaces to identify areas of concern / non-compliance and to continually improve the overall safety program.
- 5.2.4 Issue a Safety Alert or an HSE-Alert when a serious safety concern is identified. Safety Alerts and HSE-Alerts remain active / open until the hazard is eliminated or the safety issue and its control processes are incorporated into service, safety or training documentation.
- 5.2.5 Maintain all safety and environmental records in accordance with applicable governmental regulations.
- 5.2.6 Report safety performance to: Group, local management, employees and authorities as required by governmental regulations.

5.3 Site/Construction/ Authorized Supervisor:

- 5.3.1 Ensure all incidents / accidents are reported, properly investigated and that corrective action is taken to prevent a recurrence.
- 5.3.2 Corrective actions taken must be documented per the Incident Management program.
- 5.3.3 Ensure workers are adequately qualified to perform assigned work.
- 5.3.4 Ensure training needs are identified and met.
- 5.3.5 Take the necessary action to correct any unsafe working conditions brought to their attention by workers.
- 5.3.6 Correct unsafe acts and behaviors in a proactive and positive manner.
- 5.3.7 Implement and use appropriate Codes of Safe Practice and associated Safe Work Procedures (service documentation / work instructions).
- 5.3.8 Ensure appropriate and well-maintained equipment is available and utilized to perform the work activity.
- 5.3.9 Be aware of applicable regulatory requirements.

- 5.3.10 Ensure workers are informed about job hazards and are prepared to deal with any site specific hazards on the worksite.
- 5.3.11 Ensure all unessential personnel remain outside the turbine during the performance of work on energized equipment or machinery.
- 5.3.12 Ensure personal protective equipment (PPE) is readily available at the worksite, correctly used, stored, maintained, inspected and replaced when necessary.
- 5.3.13 Communicate with employees, customers, subcontractors, and vendors regarding their corporate commitment to safety.
- 5.3.14 Use safety meetings as one of the primary methods of dealing with safety performance, including the review and discussion of Safe Work Procedures (service documentation / work instructions), corporate expectations, hazardous conditions and corrective measures.

5.4 Employees

- 5.4.1 Adhere to regulations, guidelines, and safety standards as required by government regulatory agencies, and those communicated by management and supervisors.
- 5.4.2 Follow all appropriate Codes of Safe Practice, Safe Work Procedures (installation and service documentation / work instructions) contained in this manual and in the installation and service documentation.
- 5.4.3 Maintain good housekeeping in the work area.
- 5.4.4 Observe activities of fellow employees and subcontractors to ensure their safety and the safety of those around them, and correct unsafe acts in a proactive, positive manner to prevent an incident from occurring.
- 5.4.5 Deny turbine access to third part personnel for the expressed purpose of observation or inspection during the performance of work while equipment or machinery is energized.
- 5.4.6 Respectfully refuse to perform work when unsafe conditions exist or when they are unable to perform the task competently.
- 5.4.7 Report all: incidents, unsafe acts, unsafe conditions, near misses, injuries, and illnesses immediately to supervision.
- 5.4.8 Administer first aid and CPR as called upon in an emergency situation.
- 5.4.9 Participate in, and use, all relevant training offered by the company.
- 5.4.10 Inspect and properly maintain the required personal protective equipment (PPE).
- 5.4.11 All personnel must use approved personal protective equipment (PPE) and clothing where hazards or conditions warrant its use.
- 5.4.12 Operate all vehicles and mobile equipment in accordance with applicable laws, site rules, manufacturer's specifications, and company safety policies.

5.5 Subcontractors

- 5.5.1 Insist on safe performance throughout their operations by ensuring subcontractors and employees are competent to do their work properly.
- 5.5.2 Have effective health and safety programs that include programs for the identification all hazards employees may be exposed to.
- 5.5.3 Ensure employees and subcontractors meet all the safety expectations.
- 5.5.4 Ensure their safety programs and operations comply with contractual and regulatory requirements.
- 5.5.5 Provide the time and resources required to enable subcontractors and employees to conduct their activities safely.
- 5.5.6 Identify and correct hazards, unsafe work conditions and unsafe acts.
- 5.5.7 Ensure appropriate and well-maintained equipment is available and utilized to perform the work activity.
- 5.5.8 Ensure all incidents / accidents are reported and investigated and that corrective action is taken to prevent a recurrence.

- 5.5.9 Ensure workers are informed about job hazards and are prepared to deal with any site specific hazards on the worksite.
- 5.5.10 Ensure personal protective equipment (PPE) is readily available at the worksite, correctly used, stored, maintained, inspected and replaced when necessary.

5.6 Visitors

- 5.6.1 When visitors are present on worksites, they are required to meet the following safety responsibilities:
- 5.6.2 Follow the instructions of the site supervisor or personal escort.
- 5.6.3 Wear personal protective equipment (PPE) where required or directed by escort.
- 5.6.4 Never walk about a worksite unescorted.

6 General Requirements

6.1 Localization:

- 6.1.1 Worker safety is of vital importance and will not be compromised.
- 6.1.2 Competent, trained personnel are expected to perform their jobs in a safe and proper manner.
- 6.1.3 All personnel are required to conduct themselves courteously and in a manner that promotes positive public relations with fellow employees, supervisors, customers, subcontractors, government officials and the public.
- 6.1.4 For those areas where the local QSE Safety Manuals differ from the Group requirements, the QSE Safety Manuals shall prevail.
- 6.1.5 In some cases, the company has implemented a requirement that may exceed a state or provincial requirement – the higher-level requirement in the QSE Safety Manual will prevail.
- 6.1.6 In the event that a state or provincial requirement exceeds a Safety Manual procedure – the higher level requirement will prevail.
- 6.1.7 All pertinent personnel are required to actively participate in safety inspections, safety meetings, incident / accident reporting and investigative requirements.
- 6.1.8 Any person using prescription and / or non-prescription over the counter medications, that may cause drowsiness or other side effects, which could influence their ability to work safely, are to notify their supervisor prior to beginning any safety sensitive task or working near others who are performing such tasks.
- 6.1.9 Prohibited Items and Activities:
- 6.1.10 Possession, sales, consumption or being under the influence of alcohol and/or illegal drugs;
- 6.1.11 Riding any hook, hoist or other material handling equipment which is not specifically designed to carry riders;
- 6.1.12 Fighting, horseplay or practical jokes;
- 6.1.13 Gambling;
- 6.1.14 Theft and vandalism;
- 6.1.15 Cleaning, adjusting or repairing of machinery while in operation;
- 6.1.16 Operating any tool, piece of equipment or machinery without proper training;
- 6.1.17 Firearms or hunting equipment;
- 6.1.18 Removing and not replacing guards on moving belts, drive chains and reciprocated parts;
- 6.1.19 Damaging, disabling or interfering with safety, firefighting or first aid equipment;
- 6.1.20 Arriving for work or remaining at work when ability to perform the job safely is impaired;
- 6.1.21 Smoking in non-designated areas;
- 6.1.22 Possession of “strike anywhere” matches;
- 6.1.23 Unauthorized alteration or removal of locks or tags; or

6.1.24 Use of electronic devices in potentially explosive areas

7 APPENDIX: version history

Version No.	Date	Description of Changes
00	2015.01.28	Converted T09 (0025-8101) to T03 document
01	2018.02.26	Revised Sections 2, 4, 5.2, 5.3 see grey highlighted text

Starwood Energy

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Summary: Application - 26 of 40 (Exhibit S - Turbine Safety Manuals) electronically filed by Christine M.T. Pirik on behalf of Grover Hill Wind, LLC