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February 10, 2022

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Ohio Power Siting Board
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: Circleville Solar, LLC, Case No 21-1090-EL-BGN

Dear Ms. Troupe:

Attached for filing in the above referenced case is Circleville Solar, LLC's Response to OPSB Staff's Second Data Request dated January 31, 2022.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Dylan F. Borchers

Attachment

Cc: Mark Bellamy (w/Attachment)

Response of Circleville Solar to OPSB Data Request #2

Docket Number: 21-1090-EL-BGN

Date of Request: January 31, 2022

Respondent(s): Circleville Solar (the Applicant), Environmental Consulting & Technology (ECT), and E&C

Manufacturer Information

33. Referring to page 7 and Exhibit C of the Application, the Applicant mentioned representative solar panels under consideration. Will Circleville Solar, LLC select a solar panel that is listed as a Bloomberg New Energy Finance tier 1 solar panel supplier/manufacturer? If no, is there any other standard that Circleville Solar intends to use in its selection of manufacturer(s)?

Response:

At this time, the Applicant intends to select a solar panel that is listed as a Bloomberg New Energy Finance tier 1 solar panel supplier/manufacturer. As indicated in #34, the two solar panel manufacturers that the Applicant is considering for this Project are on the tier 1 list. However, if supply chain limitations prohibit the Applicant from utilizing a tier 1 supplier/manufacturer then the Applicant will supply the other standard to the staff for review.

34. Referring to Exhibit C of the Application, what solar panel manufacturers are Circleville Solar, LLC considering for this project?

Response:

Trina Solar and Jinko Solar are the solar panel manufacturers being considered by the Applicant for this Project. As noted in Response #33, if supply chain limitations prohibit the Applicant from utilizing Trina Solar and Jinko Solar panels then the Applicant will supply the alternate panel manufacturer information to the staff.

35. Does Circleville Solar, LLC anticipate using more than one solar panel manufacturer for this project?

Response:

Yes, the Applicant typically uses primary and safe harbor modules in the PV array areas and expects to use two solar panel manufacturers for this Project.

36. Have the solar panels under consideration by Circleville Solar, LLC passed the US EPA's Toxicity Characteristic Leaching Procedure (TCLP) test?

Response:

All panels to be considered by the Applicant will pass the US EPA's TCLP test and be determined non-hazardous.

37. Will Circleville Solar, LLC only consider using solar panels that do not exhibit the characteristic of toxicity through analysis with the US EPA's TCLP test?

Response:

It is the Applicant's standard procedure to have all panels tested and determined to be non-hazardous in order to be delivered and installed.

Glint and Glare Analysis

38. The Visual Impact Assessment (Exhibit R) and page 103 of the Application describe the solar panel height as 16 feet tall, please explain why 18 feet was chosen for the Glint and Glare Analysis (Exhibit M) and why that is an appropriate height input.

Response:

Analysis in the Glint and Glare Report took a conservative approach in methodology in the event of a change in height. The solar panels in the facility will not exceed 16 feet despite the additional 2 feet included in the report.

Emergency Response Plan

39. Will the emergency action plan for the project referenced on page 51 of the Application be provided to OPSB Staff prior to the preconstruction conference?

Response:

Yes

40. Please provide the current draft emergency action plan or an example emergency action plan.

Response:

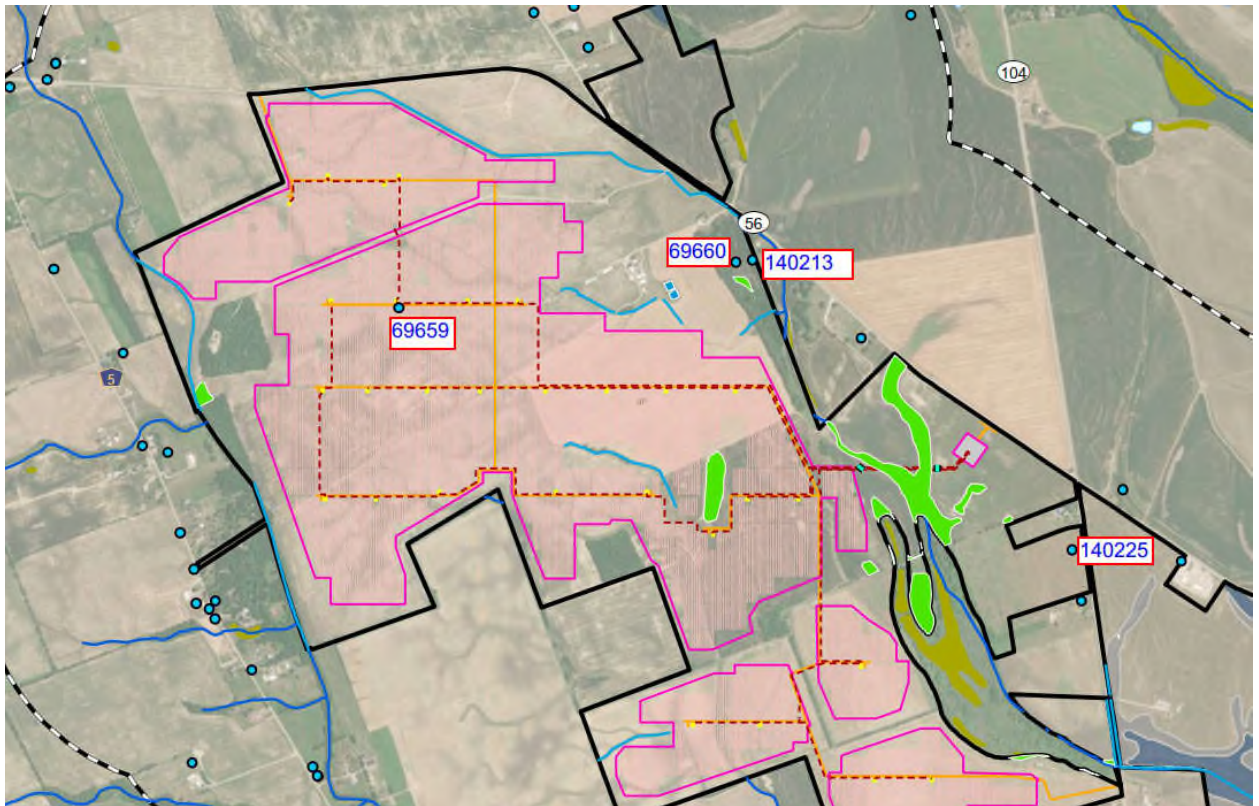
The emergency action plan is included as an attachment (Attachment 1) to this data request with specific personnel contacts to be updated prior to construction.

Impacts to Public and Private Water Supply

41. What is the distance between the solar farm equipment and the four private water wells mentioned on page 58 and Exhibit A (Figure 8-2) of the Application?

Response:

See the table and screenshot from Figure 8-2 below with Well Map IDs labeled. The Applicant has been coordinating with the landowner for Well 69659 and it is our current understanding that this well no longer exists. The Applicant will continue to work with the landowner to confirm.



Water Wells in Study Area

MAP ID	LATITUDE	LONGITUDE	DISTANCE TO CLOSEST SITE LAYOUT FEATURE (FEET)	SITE LAYOUT FEATURE	INSIDE FENCED-IN PROJECT AREA?
69659	39.617286	-83.035124	5	PV Panel	Yes
69660	39.618860	-83.020688	918	Fence	No
140213	39.618952	-83.019966	1,561	Fence (Substation)	No
140225	39.609391	-83.006200	1,051	Fence	No

42. Please explain what possible avoidance, minimization, and/or mitigation measures Circleville Solar, LLC will employ during construction for water well locations in the project area.

Response:

The existing wells identified in #41 in the Study Area will be avoided during construction.

43. As mentioned, and identified on page 58 and Exhibit A (Figure 8-2) of the Application, what is the distance between the solar farm equipment and the Village of Williamsport's outer

management zone of its Source Water Protection Area?

Response:

The distance between the solar farm equipment and the Village of Williamsport's outer management zone of its Source Water Protection Area is 1,989 feet to an access road entrance.

44. As mentioned, and identified on page 58 and Exhibit A (Figure 8-2) of the Application, what is the distance between the solar farm equipment and the Village of Williamsport's inner management zone of its Source Water Protection Area?

Response:

The distance between the solar farm equipment and the Village of Williamsport's inner management zone of its Source Water Protection Area is 3,263 feet to an access road entrance.

45. It is unclear from pages 11 and 42 of the Application whether Circleville Solar, LLC will develop and implement a spill prevention, control, and countermeasure (SPCC) plan to avoid, minimize, and mitigate release of hazardous substances or contaminants. Will Circleville Solar, LLC develop and implement a spill prevention plan or SPCC to avoid, prevent, and mitigate the release of hazardous substances or other contaminants?

Response:

Yes, the Applicant will develop and implement a SPCC plan to avoid, prevent, and mitigate the release of hazardous substances or other contaminants both during the construction and operation phases of the Project.

Aviation

46. The Visual Impact Assessment (Exhibit R) indicates that the heights of the collector substation lightning mast will be 50 feet tall, and that substation equipment will be 25 feet tall or less. Please confirm what the heights of the following structures at the solar farm would be
- collector substation support or dead-end structures,
 - and substation lightning mast.

Response:

The collector substation support or dead-end structures will be approximately 55 feet tall and the substation lightning mast approximately 50 feet tall.

ATTACHMENT 1
EMERGENCY RESPONSE PLAN

POWER GENERATION DIVISION	Process Category: Regulatory Process: Emergency Management	DOC #: SMS 237		
	TITLE: Circleville Solar Emergency Action Plan	REVISION: 10/21/2021	REV #: 1	PAGE 1 of 32

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1.0 DOCUMENT STORAGE AND INFORMATION

- 1.1. This Emergency Action Plan for Circleville Solar, LLC is stored in the Power Generation Division Operation Model ("OpModel").

2.0 REVISION HISTORY

Rev #	Revision Description	Approved By Position / Title	Effective Date

3.0 PURPOSE AND SCOPE

- 3.1. The purpose of this Emergency Action Plan is to establish the planned response actions that will be taken by personnel at the Circleville Solar Project in the event of an emergency. These actions are intended to mitigate health risks to plant personnel and people in the surrounding community, as well as minimize adverse impacts to the environment.
- 3.2. This plan serves as guidance intended to be a "living" document such that revisions over time, based on experiences, will continue to increase the speed of identification of threats and decrease response time. This plan applies to all employees, contractors, vendors and visitors performing work at NextEra Energy Resources facilities in the United States and Canada.

Note: Each plant/site will maintain a sign in / sign out list for visitors and contractors. This is critical so that in the event of an emergency, the plant will be able to accurately determine if all personnel are accounted for. All employees, contractors and visitors should have a picture ID so in the event of an accident or illness, the identity of the injured can quickly be determined (Site management may elect to require names on hard hats in place of the picture ID). This is a PGD requirement.

4.0 REFERENCES AND COMMITMENTS

1. OSHA 29 CFR 1910.38 (Emergency Action Plans)
2. OSHA 29 CFR 1910.39 Appendix to subpart E (Fire Prevention Plans)
3. SMS 247 - Severe Weather Guidelines
4. SMS 222 – Fire Protection Plan Procedure
5. SMS 270 - Safety Signs, Barriers, and Equipment Tags
6. SMS 209 - Health and Safety Inspections
7. SMS 214 - Personal Protective Equipment (PPE)
8. NEE-SAF-1610 Electric Shock
9. Corporate Security - Drone
10. Wildfire Mitigation Plan

5.0 DEFINITIONS

- 5.1. AED – Automated External Defibrillator
- 5.2. CPR – Cardiopulmonary Resuscitation
- 5.3. EAP – Emergency Action Plan

- 5.4. O&M – Operations and Maintenance
- 5.5. OSHA – Occupational Safety and Health Administration
- 5.6. PGD – Power Generation Division
- 5.7. PPE – Personal Protective Equipment
- 5.8. ROCC – Renewable Operations Control Center
- 5.9. SMS – Safety Management System

6.0 PREREQUISITES AND INITIAL CONDITIONS

- 6.1. Power Generation Division requires the use of Personal Protective Equipment (PPE). [SMS 214](#) provide a standardized method to define requirements for PPE. The requirements for PPE are dictated based upon the expected hazards of the work. During emergencies, prudent judgment is required as conditions that may pose a risk to safety may be amplified by the nature of the event. Teammates are expected to STOP and evaluate risks associated with the situation to ensure mitigation of safety hazard to self and others in the vicinity. PPE Hazard Assessment Forms should be used as part of emergency drills to help assess the need for additional special protection during emergency situations.

7.0 RECORDS

- 7.1. Paper copies of this Emergency Action Plan shall be maintained locally on site easily accessible to all at normally occupied locations.
- 7.2. An electronic copy of this plan shall also be accessible on the facility's LAN and in the PGD OpModel.
- 7.3. This Emergency Action Plan shall be reviewed upon implementation, whenever revisions are made, and at least annually by the Site Emergency Primary or Alternate Facility Coordinator.

8.0 PROCEDURE

8.1. Statement of Compliance

- 1. This Emergency Action Plan was prepared by NextEra for the Circleville Solar Project.
- 2. Thus, I hereby state that the Circleville Solar project has evaluated the requirements of all applicable State and Federal Laws and recognize that this Plan has been prepared in accordance with the requirements therein.

Name: _____

Signature: _____

Title: _____

Date: _____

8.2. Designation of Facility Emergency Coordinators

- 1. It will be site/plant policy that the Facility Representative (as formally designated to the Ohio State Emergency Response Commission in the facility's 40 CFR 355.30(b) notification letter) will be known as the "Facility Emergency Coordinator" for the purposes of defining roles in this Emergency Action Plan

2. Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

Primary Facility Emergency Coordinator:

NAME TBD Site/Plant Leader* TBD

Alternate Facility Emergency Coordinator:

NAME TBD Regional General Manager TBD

3. Personnel who may be contacted for further information or explanation of duties under this plan are as follows:

NAME TBD Site/Plant Leader* TBD

NAME TBS Regional Plant General Manager TBD

*To be updated at start of construction and start of operations.

8.3. Training

1. All O&M personnel that may work at the site that will have access to the site shall receive training on this Emergency Action Plan whenever it is modified and on an annual basis.
2. Employees shall also be trained when this Plan is initially implemented.
3. If the facility has an alarm system, each plant employee, visitor and contractor shall understand the types of local plant alarms and what they are expected to do in the event of each alarm. The plant safety team must assure that the alarms are audible at all plant buildings and locations.
4. Contractors and visitors shall receive the PGD and site-specific Contractor and Visitor Orientation to be informed of site emergency procedures, alarms, muster areas and evacuation procedures before they begin work on the site for the first time; and at least annually thereafter. They need th be in to get the orientation by site representative.
5. A listing of contractors with current training on this Emergency Action Plan will be maintained at the facility for reference purposes.

8.4. Facility Location Information for Outside Emergency Responders

1. The Project Facility is bordered to the north by State Route 56 (OH-56) and is located generally north of U.S. Highway 22 (US-22), while being bounded to the east by State Route 104 (OH-104). The proposed solar arrays of the Project are accessed by one ingress/egress point along southbound OH-104 and a second ingress/egress point along southbound OH-56. The Project substation is accessed by one ingress/egress point along southbound OH-56.

8.5. General Emergency Procedure

1. This Plan was developed for the following plausible contingencies that could transpire at the facility:
 - a. Natural Disaster /Severe Weather Event (APPENDIX 1)
 - b. Fire Response Event (APPENDIX 2)

- c. Physical Security Event (APPENDIX 3)
 - d. Cyber Security Event (APPENDIX 4)
 - e. Capacity/Transmission Event (APPENDIX 5)
 - f. Environmental Event (APPENDIX 6)
 - g. Gas Pipeline Event (APPENDIX 7)
 - h. Oil Pipeline Event (APPENDIX 8)
 - i. Pandemic Event (APPENDIX 9)
 - j. Immediate Site Evacuation Procedure (APPENDIX 10)
 - k. Delayed Site Evacuation Procedure (APPENDIX 11)
 - l. Designated Egress Routes & Muster Areas for Evacuations (APPENDIX 12)
 - m. Personnel Injuries and Serious Health Conditions (APPENDIX 13)
2. It shall be the responsibility of the site leader to assess a developing emergency situation and initiate the appropriate actions in this plan to protect personnel, the surrounding environment, and plant equipment from adverse damages.
3. In the event of an emergency where personnel shall be protected, the following actions will be immediately performed:
- a. Contact 911 or Fire Department immediately.
 - b. Have Control Room Operator perform an analysis on the requirements for continued safe operation
 - c. Initiate site shutdown procedure (if required)
 - d. Ensure that key personnel are contacted:

Title	Name	Office Phone	Cell Phone	Home Phone
Site Leader*	TBD	TBD	TBD	TBD
Emergency Coordinator*	TBD	TBD	TBD	TBD
ROCC	TBD	TBD	TBD	TBD
Security Operations	TBD	TBD	TBD	TBD

*To be updated at start of construction and start of operations.

- e. Any work-related permits (i.e., Confined Space, Hot Work) in effect shall be immediately voided, and personnel involved in such work shall cease all activities.
 - f. All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.
4. Based upon the type and extent of the emergency, the site leader shall assess whether an evacuation should be initiated.
5. The following criteria should be considered in rendering a decision to conduct an evacuation of the facility:
- a. The affected parts of the facility and severity of the emergency.

- b. Restrictions in Egress routes caused by the emergency.
 - c. Wind direction (if the emergency involves gases/vapors)
 - d. Sustained wind speed is greater than 40 mph
 - e. People currently located at the facility (day shift, night/weekend shift, visitors/contractors, etc.)
6. If the Site/Plant Leader determines that a facility evacuation is necessary, he/she must determine which type of evacuation to direct.
- a. The following sections describe the types of evacuations that can be performed:
 - 1) Immediate Site Evacuation
 - i. This type of evacuation would be used only in the event of an emergency grave enough to warrant immediate evacuation of all personnel.
 - ii. In this type of evacuation, operating area personnel shall evacuate without regard for shutdown of plant systems or for placing plant systems in the safest mode possible.
 - iii. This type of evacuation shall only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.
 - iv. The production leader will designate production technicians to assist with the evacuation of any employee, visitor or contractor who may have special needs that could limit their ability to evacuate safely.
 - 2) Delayed Site Evacuation
 - i. This type of evacuation would be used in a serious emergency situation where non-essential personnel (those not involved in plant operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the facility prior to evacuating.
 - ii. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the facility.
 - iii. The Site/Plant Leader and/or Facility Emergency Coordinator must assess whether or not the prevailing circumstances warrant keeping essential personnel in plant operating areas to perform a controlled shutdown of the facility.
 - iv. If personnel shall not be exposed to unnecessary danger to perform facility shutdown and/or place the facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.
7. Although the Site Leader or Emergency Coordinator may initially designate an evacuation to be a Delayed Site Evacuation, they shall always be mindful conditions may change rapidly, and result in the need to call for an immediate Site Evacuation.
8. If the Site/Plant Leader (or Facility Emergency Coordinator, as appropriate) determines that an evacuation is necessary, they shall ensure that a sounding of the plant alarm is initiated.
- a. In this case, an evacuation alarm will be sounded and all employees/visitors accounted for.
 - b. The Site Leader or Emergency Coordinator shall designate an employee(s) to assist in evacuation of any employee, visitor, or contractor who may have special needs that could limit their ability to evacuate safely

9. If an evacuation has been directed, and following the sounding of the evacuation alarm, the Site/Plant Leader shall ensure that instructions for evacuation are communicated to personnel over the site/plant radio system. These instructions should include the following items at a minimum:
 - a. The type of evacuation to be performed (Immediate Site Evacuation or Delayed Site Evacuation)
 - b. The nature of the emergency
 - c. The location(s) of the emergency
 - d. Any egress routes that should not be used by evacuating personnel (if known and applicable)
10. If an evacuation has been ordered, personnel shall follow one of the following evacuation procedures, as appropriate, based upon the direction of the Site/Plant Leader and/or Facility Emergency Coordinator:
 - a. Immediate Site Evacuation Procedure (APPENDIX 10)
 - b. Delayed Site Evacuation Procedure (APPENDIX 11)
 - c. Perform the appropriate follow-up per the appendices listed on 8.5.1 above.

8.6. Emergency Action Plan Annual Drills

1. It is the responsibility of the Site Leader to ensure FOUR Emergency Action Plan Drills are performed each year.
2. Emergency Action Plan Drills are to be held quarterly to ensure all site teammates have gone through at least one drill per year
 - a. The type and content of drill (full functional drill, table top, etc.) will be determined by the site leader based on current needs.
 - b. At least one of the quarterly drills SHALL be a fire drill
3. In addition to performing the drills, the Emergency Action Plan must be reviewed for accuracy.
 - a. Make updates as required and forward revised plan to the Plant / Site emergency coordinator. As applicable, concurrently update the iRAMF application to reflect any Emergency Action Plan changes.
 - b. Ensure site team has been trained on any changes.
4. Each drill's content will be determined by the site leader based on current needs.
5. Every site should have (and practice) an alternate emergency evacuation path. The type of drill (table top, full functional drill, etc.) will be determined by the site leader based on current needs, but it must include a documented evacuation of the O&M / service building.
6. The targeted drill response time is less than 4 minutes, monitor and record the response time to determine if all employees responded in a timely manner.
7. Every site should have an identified off site muster area.
8. Each site shall contact the Renewable Operation Control center (ROCC) as part of the drill.
9. A roster of drill attendees and date of drill will be filed with sites' Emergency Action Plan documents
10. Any gaps or action items that are a result of the drill will be identified, resolved, fully documented, and filed with the sites' Emergency Action Plan documents.

Note: That MAXIMO is to be used to document actual tasks to be completed to close gaps.

End of Procedure

APPENDIX 1 NATURAL DISASTER / SEVERE WEATHER EVENT

1. Natural emergencies considered in this procedure are associated with weather disturbances such as tornadoes, flooding, hurricanes, blizzards, high wind conditions, hail, earthquakes, wildfires and severe thunderstorms. Flooding waters, lightning, high winds and heavy rains may be detrimental to the employees and/or equipment and structures at the facility. Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Plant Leader at the facility has several means to monitor these weather-related emergencies. These include:
 - Internet access to weather-related web-sites;
 - AM/FM radio to monitor local news stations
 - PGDAPPS WeatherSentry Online
 - PGD Severe Weather Notification System
 2. When information is received that a severe weather watch has been issued for the facility area the following actions shall be taken:
 - a. Site Leader shall notify the General Manager.
 - b. General Manager shall make a determination about whether or not the plant should be shut down due to the weather situation.
 - c. Personnel shall seek indoor shelter in the plant in a designated secure location, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility.
- Note:** Earthquake preparedness - At Home - At Work - At Play: At Play check sheet can be found on the PGD Emergency Preparedness SharePoint for reference.
3. In the event of a natural disaster / severe weather event, where advance warning is known, such as a hurricane, blizzard, etc. the plant / site personnel shall closely coordinate with the PGD Emergency Response Coordinator, during pre and post event activities.
 4. In the event of a severe weather / natural earth process event such as a severe thunderstorm, high wind conditions, earthquake, etc. where advance warning may not be known, the plant / site shall refer to the site specific operating plans to take the actions necessary to assure the safety of all employees and the public. Additionally, site personnel will take reasonable action to prepare for the event to address environmental exposure and the securing of equipment, consistent with the event conditions. However, under no circumstances are personnel to place themselves in harm's way.
 5. The following list represents actions that should be taken at the site in order for it to be secured. The listing is not intended to be all inclusive and will vary in applicability pending advance warning of the on-set of the event.
 - Ensure site personnel are safe and accounted for.
 - Review staffing levels and arrange for additional staffing "Storm Riders" as applicable
 - Secure plant equipment as necessary and as weather conditions permit, noting to properly follow established guidelines to safeguard personnel while working outdoors in preparation for severe weather. Reference the Wind Speed Matrix in SMS 247 - Severe Weather Guidelines to assess preparation work conditions.

- Seek safe shelter. If in your vehicle in winter, ensure survival kit and enough gas is in place.
- Ensure all portable equipment is stored indoors.
- Ensure that switchgear are load center are closed and latched.
- Ensure that the building doors are closed and latched.
- Place all trashcans in locations not exposed to weather.
- Make a general housekeeping inspection and ensure that all loose objects and debris that could potentially become airborne are secured or inside.
- Ensure all radios are fully charged.
- Secure all CONEX Storage buildings.
Note: Use caution when using self-locking CONEX box as a teammate(s) may get trapped from the inside.
- Monitor the weather conditions.
- Ensure that there is an ice plan for walkways
- Ensure all compartments accessory doors and closed and latched.
- Ensure all sump pumps are in good working condition.
- Ensure the proper condition and location of all mobile and gantry cranes, hoists, and booms.

6. Person in charge or his/her designee will:

- Monitor the weather radio, TV or other monitoring equipment, and report any changes in the situation that could affect plant / site personnel and / or equipment to the Person in Charge.
- Ensure sustained wind speeds are not greater than 39 mph before sending personnel outside plant buildings
- Sound plant alarm system if a tornado or other similar severe weather warning is issued.
- Follow instructions from the Person in Charge in the case of equipment shutdown is necessary.
- Notify the ROCC of the potential of a severe weather / natural earth process event.

7. Operations:

- Operate the plant consistent with instructions provided from the Transmission Operator (TOP). If, the instructions cannot be followed, i.e. safety, environmental, reliability, etc. immediately notify the Transmission Operator to discuss and alternative operating actions. Document discussions in the Operators log.

Note: The decision to remove units from service will be discussed between Plant Management / Person in charge, the PGD Emergency Response Coordinator, appropriate VP of Operation in conjunction with the respective Transmission Operator, to produce the operation plan for the plant.

APPENDIX 2 FIRE PREVENTION AND EVENT RESPONSE

This appendix describes measures the site shall take to prevent or minimize potential fire severity and to safely respond to a fire emergency. Refer to SMS 222 Fire Prevention and Life Safety.

In the event that a fire occurs, the safe and expedient response actions are essential to protect the health, life, and safety of personnel, the environment, and minimize equipment damage. Sites shall have a list and location map of fire extinguishers.

Person in Charge (PIC) Responsibilities

The PIC shall determine the following:

1. Need to muster or evacuate personnel

a) In this event, teammates shall remain in muster location until the “all clear” is issued by Unified Command or the PIC

2. Equipment or activities to be shutdown, stopped, or isolated

3. IF Renewable Site - Report Fire to ROCC

4. IF Fossil, Instruct Control Room to notify local Fire Rescue and EMS

OR IF Renewable Site - PIC will notify local Fire Rescue and EMS

a) In the event local Fire Rescue or EMS is dispatched, designate site personnel to escort Fire Rescue, EMS, and HAZMAT to the fire location and provide specific information about equipment, hazardous chemicals, electrical sources, fuels, lithium-ion batteries, or other risks.
NOTE: Fire Rescue once on site, shall then assume situational control.

b) Refer to off-normal procedures for specific actions as applicable.

RACE Protocol

A person discovering a fire shall follow the **RACE** protocol as described below:

Rescue anyone in danger (only if safe to attempt);

Alarm, call the ROCC (via plant phone, cell, or 2-way radio) to report the fire: Person in Charge (PIC) shall make the determination to call 911 and sound the alarm

Report the following:

1. Explain the location and cause, if known, of fire
2. List the injuries, if any, that have occurred
3. Relay any actions, if any, that have been taken to extinguish an incipient stage fire

Contain the fire (only if safe to do so)

Extinguish the incipient stage fire (only if trained and it is safe to do so)

A person discovering a fire in an incipient stage shall choose to attempt extinguishing the fire only if the following two criteria are met:

1. Fire can be extinguished or controlled with 1 portable fire extinguisher, and
2. They perceive an adequate level of safety to extinguish the fire

Note: Fire-fighting efforts beyond incipient stage shall be performed by only local Fire Rescue

Attachment 1, List of Major Fire Hazards

Circleville Major Fire Hazards Risk Management

Note: Fire extinguishers shall only to be used for small incipient stage fires. Only trained firefighters shall attempt to mitigate a fire that is beyond the incipient stage. Portable fire extinguishers are classified according to their size and intended use on four classes of fires. The general operating instructions can be remembered by the letters P-A-S-S.

Pull the pin at top of the extinguisher (that keeps the handle from being pressed)

Aim the nozzle toward the base of the fire

Squeeze the handle to discharge the agent inside (15-30 seconds of discharge time)

Sweep the nozzle back and forth at base of the flames to disperse the extinguishing agent

Fire Classifications

Class A - Fires involving ordinary combustible materials (e.g., wood, cloth, paper, many plastics) Water as a cooling or quenching effect to reduce temperature of burning material below ignition temperature.

Class B - Fires involving flammable liquids and gases. Smothering or blanketing effect of oxygen exclusion is effective.

Class C - Fires involving energized electrical equipment. always attempt to de-energize high voltage circuits and treat as a Class A or B fire depending upon the fuel involved.

Class D - Fires including combustible metals such as magnesium, titanium, and potassium. Extremely high temperature of burning metals makes water and other common extinguishing agents ineffective.

Class K - Fires involving cooking products (fats, grease, oils). These extinguishers work on the principle of saponification.

APPENDIX 3 PHYSICAL SECURITY EVENT

The purpose of this document is to describe the roles, responsibilities, and the associated actions in response to PHYSICAL SECURITY incidents, which includes but is not limited to INTRUSION, DRONES, BOMB THREATS, SABOTAGE, VANDALISM, TERRORISM or OTHER security events at a PGD facility.

RECOGNIZING ACTS OF TERRORISM, HOSTILE INTRUDER & SIGNS OF POTENTIAL VIOLENCE

If a Hostile Intruder enters the Circleville Solar Project, each person shall quickly determine the most reasonable way to protect his/her own life. Visitors and contractors are likely to follow the lead of employees and managers during a hostile intruder situation.

During such an event, each person shall take the following actions, accordingly:

1. EVACUATE
 - Have an escape route and plan in mind
 - Leave your belongings behind
 - Keep hands visible
2. HIDE OUT
 - Hide in area out of intruder's view
 - Block entry to your hiding place and lock the doors
 - Mute or turn off your cell phone
3. TAKE ACTION (As last resort and only when your life is in imminent danger)
 - Attempt to incapacitate the intruder
 - Act with physical aggression and throw items at the intruder
4. Call 911 when it is safe to do so.

Note: Keep cell phones on mute/vibrate

For additional information refer to Corporate Security Policy, Procedure #NEE-SEC-1720. Hostile Intruder Response Procedure.

An active shooter may be a current or former employee, or an outsider. Call Security Operations Center (SOC) at 561 694- 5000 if is believe an employee exhibits potentially violent behavior.

For employees, Indicators of potentially violent behavior may include one of the following:

- Increased use of alcohol and/or illegal drugs
- Unexplained increase in absenteeism, and/or vague physical complaints
- Depression/Withdrawal; Increased talk of problems at home
- Increased severe mood swings, noticeably unstable or emotional responses
- Increase in unsolicited comments about violence, firearms, other dangerous weapons and crimes

For additional information refer to Corporate Security Safe and Secure Workplace Policies, Procedure #NEE-SEC-1768

In the event that the site receives threatening correspondence either by phone or by other means of communications, the following actions should be performed immediately:

1. Actions by the person receiving the threat:

- a. Gather as much information as possible from the person making the threat.
- b. If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted.
- c. If the threat is being made verbally (phone, or other), communicate and obtain information from the individual making the threat for as long as possible. For phone threats note the time of the call, do not interrupt the caller and describe the tone of voice as well as any background sounds.
- d. Inform the Site/Plant Leader and/or General Manager of the situation.
- e. Contact Security Operations Center (SOC) at 561-694-5000
- f. Contact local law enforcement, as applicable (e.g. 911)
- g. Contact the (ROCC) at 561-694-6363 (See Technology Table in section 5.0 Definitions)
- h. Communicate the Physical Security Event to all on-site personnel.
- i. Document / update the event in the Service Request application in Maximo.
- j. Refer to the PGD Sabotage Reporting procedure at: NEE-SEC-1764 - Security Notifications and Event Reporting
- k. This document should be consulted in order to assure adherence to the latest definitions and reporting instructions for sabotage and vandalism.
- l. Refer to the following procedure: PGD NERC Disturbance and Security Event Reporting EOP-004 Operating Plan

2. During the report describe what you have discovered/witnessed and the location of the affected facilities to include the items outlined below, as available:

- The date and time of the incident
- Description of the incident
- Likely target
- Number of people involved
- Suspect and/or vehicle information
- Type of equipment or material used for the activity
- Generation capacity affected in Megawatts
- Was there an actual or suspected physical attack that could cause a major impact to the Bulk Electrical System (e.g. generator, transformer, fuel supply)?
- Was there any destruction of any security systems (cameras, badge readers, security barriers, locks) or any of its components?
- Was there any actual or suspected cyber or communication attack that could impact the Bulk Electrical System adequacy or vulnerability? (See the Cyber Security Response section for more details regarding Cyber Security events)
- Are there mitigation measures in place to correct the event?
- The name and contact number for the point of contact

3. The Plant Leader and/or General Manager may consider any or all the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

- Order an evacuation of the facility
- Never use radios or use cell phones near a suspected bomb
- Call 911 for Police or Fire Assistance if they have not already been notified
- Arrange for additional security personnel for the facility.
- Direct plant personnel to commence a controlled shutdown of the facility.
- Direct searches to be performed on vehicles entering the facility.

Refer to the following procedure: NEE-SEC-1760 – Responding to Bomb Threats

In case of an evacuation due to a bomb threat, please refer to the information below to maintain a safe distance.

BOMB THREAT EVACUATION DISTANCES



THREAT	THREAT DESCRIPTION	EXPLOSIVES CAPACITY ¹ (TNT EQUIVALENT)	BUILDING EVACUATION DISTANCE ²	OUTDOOR EVACUATION DISTANCE ³
	PIPE BOMB	5 LBS/ 2.3 KG	70 FT/ 21 M	850 FT/ 259 M
	BRIEFCASE/ SUITCASE BOMB	50 LBS/ 23 KG	150 FT/ 46 M	1,850 FT/ 564 M
	COMPACT SEDAN	500 LBS/ 227 KG	320 FT/ 98 M	1,500 FT/ 457 M
	SEDAN	1,000 LBS/ 454 KG	400 FT/ 122 M	1,750 FT/ 534 M
	PASSENGER/ CARGO VAN	4,000 LBS/ 1,814 KG	640 FT/ 195 M	2,750 FT/ 838 M
	SMALL MOVING VAN/DELIVERY TRUCK	10,000 LBS/ 4,536 KG	860 FT/ 263 M	3,750 FT/ 1,143 M
	MOVING VAN/ WATER TRUCK	30,000 LBS/ 13,608 KG	1,240 FT/ 375 M	6,500 FT/ 1,982 M
	SEMI-TRAILER	60,000 LBS/ 27,216 KG	1,570 FT/ 475 M	7,000 FT/ 2,134 M

All personnel must either seek shelter inside a building (with some risk) away from windows and exterior walls, or move beyond the Outdoor Evacuation Distance.

Preferred area (beyond this line) for evacuation of people in buildings and mandatory for people outdoors.

¹ Based on maximum volume or weight of explosive (TNT equivalent) that could reasonably fit in a suitcase or vehicle.

² Governed by the ability of an unstrengthened building to withstand severe damage or collapse.

³ Governed by the greater of fragment throw distance or glass breakage/falling glass hazard distance. Note that pipe and briefcase bombs assume cased charges which throw fragments farther than vehicle bombs.

Note: At the first sign of a potential intruder trespassing into an accessible tall structure at the site, immediately proceed to back off, observe from a safe distance and call Corporate Security as well as the Local Law Enforcement. Law enforcement responders are trained to protect and serve their communities. Emergency responders from the local law enforcement department may require a quick training/briefing to safely enter and climb the structure (if applicable) as well as fall protection equipment. After they provide a verbal command to the potential intruder(s), they may need access the structure. To the extent possible, facilitate their ability to enter without interfering with their efforts.

APPENDIX 4 CYBER SECURITY EVENT

Detection: Site Instructions:

1. Site personnel may become aware of a cyber-incident or the potential for a cyber-incident from any of the following sources:
 - A system page/email alert to an administrator/operator.
 - Notification may come from the ROCC
 - An employee or Business Unit (BU) that first recognizes a potential incident that needs to be reported to Security Operations Center.
 - A Business Unit designated to be contacted by an outside agency such as NERC, FERC, SERC or other outside source
 - A business partner
 - A manager
 - An outside source Notification may come as part of NEE's Security Notifications and Event Reporting Policy (NEE-SEC-1764 - Security Notifications and Event Reporting to Corporate Security or System Operator).
 - Notification may come from the ROCC (See Technology Table in section 5.0 Definitions)
2. Site verifies the condition (Fleet Team, Vendors, Information Security, etc. may be required to help determine if event is cyber related).

Response: Site Instructions:

1. Site makes the unit safe or stabilizes the unit as needed, plans the recovery if appropriate.
 - First Responder should be prepared to describe the incident in detail to the ITSC or Security Operations Center (SOC). The First Responder is not required to investigate and determine if the event is an actual cyber security incident.
 - First Responder will notify their Immediate Supervisor and the ROCC
 - First Responder may reference the PGD Cyber Security Incident Response Plan – First Responder – Diagram (Flow Chart) to guide you through the detection, response and reporting steps.
2. Site communicates to the appropriate parties:
 - a. Immediate Supervisor
 - b. Corporate Security (contact number is listed on the back of ID badges) or the IMSC
 - c. Plant General Manager
 - d. ROCC- will release awareness notification – Reference ROCC follows:
 - PGD-JB-FPDC-ON 1315181201
 - PGD NERC Security & Event Reporting procedure for PGD cyber-attack reporting purposes
 - e. Local Emergency Services, if appropriate
 - f. System Operator, if appropriate
 - g. Transmission Operator, if appropriate
 - h. Establishes the appropriate Incident Command structure
 - i. Executes Incident Command

Recover: Site Instructions:

1. The team restores the cyber assets affected by the incident to normal operations. This may require reloading data from backup tapes, or reinstalling cyber assets from their original distribution media
2. Once the affected cyber assets have been restored, they are tested to make sure they are no longer vulnerable to the vulnerability that caused the incident
3. The impacted system(s) are tested to ensure they will function correctly when placed back in production

APPENDIX 5 CAPACITY / TRANSMISSION EVENT

Plant Site Roles and Responsibilities

1. Site Leader, ROCC Operator, or Person receiving CAPACITY SHORTFALL
 - a. If the communication of a Capacity Short-Fall is for informational purposes and no Operator action is required the individual receiving the communication shall notify the ROCC, Site Leader/Plant Leader or other person in charge providing the information outlined below as available.
 - b. If the communication of a Capacity Short-Fall requires Operator Action the ROCC Operator or Person receiving a CAPACITY SHORTFALL notification from the respective Transmission Operator or other Reliability Entity e.g. Balancing Authority, Reliability Coordinator, shall immediately comply with directive / operating instructions received from the Transmission Operator or provide an explanation as to why the directive / operation instruction cannot be performed e.g., safety, environmental, reliability, regulatory, etc.
 - c. Three-part communication with the Reliability Entity shall be used and the communication shall be logged. The ROCC, Site Leader / Plant Leader or other person in charge shall be contacted and provided the information outlined below as available.
 - 1) Content of communication from the Reliability Entity
 - 2) Name of individual who called
 - 3) Time of call
 - 4) The general communication received or the directive / operating instruction received.
2. Site leader/Plant Leader or other Person in Charge
 - a. In response to receiving a CAPACITY SHORTFALL communication, the Site leader/Plant Leader or other Person in Charge will:
 - 1) Validate the notification with Transmission Operator if appropriate
 - 2) Validate the notification with ROCC
 - 3) Once validated, Direct the CRO to follow the notification instructions
 - 4) Communicate the notification to site management
 - b. If site management is not available, communicate directly with the Operations VP.
 - c. For a NEER facility also contact project business management and ensure that other facility agreements are not violated. It is recommended that the potential for Transmission Operator requests should be vetted and documented before commercial operation of the facility.
 - 1) Communicate notification to the ROCC
 - 2) Prepare and review procedures for maximizing output and energy conservation
 - 3) Advise site personnel not to perform any discretionary maintenance, testing or evolutions (with the exception of approved thermal performance testing) which could present a risk to generation
3. All other site personnel not directly involved with responding
4. All other personnel that are not directly involved with responding to the CAPACITY SHORTFALL shall not perform any maintenance or activities that would put Mega Watts (MW's) at risk.

APPENDIX 6 ENVIRONMENTAL EVENT

The spill or release of any chemical, oil, fuels or Heat Transfer Fluid (HTF) is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that plant personnel will not respond to spills/releases, but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term “respond” in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of actually stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the Step 1 Example below should not be construed to be acting in the role of a “responder”, as it is defined in EPA and OSHA HAZWOPER regulations.

The basic actions to be taken in response to an ammonia chemical, oil, fuels or HTF spill or release are the following:

1. If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) if it can be stopped without incurring additional personal exposure to the substance.

Example: A person opens the drain valve on a line that results in an unexpected release. If the person can immediately stop the release by closing the valve, this action should be taken if no additional exposure to the chemical will occur by doing so.

2. The person discovering a spill/release should immediately move to a location that is a safe distance upwind from the affected area,
 - a. If it is safe to do so under prevailing conditions, remain within observation distance.
 - b. If safe conditions are in doubt, do not risk exposure – leave the area immediately.
3. The person discovering the spill should look for other personnel in the area, and warn them by any means available of the event that has occurred. The Site/Plant Leader should be notified immediately over the radio. Information provided should include all of the following that are known:
 - a. What type of chemical has been spilled/released?
 - b. Location of the spill/release.
 - c. If source of the spill/release has been stopped.
 - d. If injuries or chemical exposure has occurred to personnel.
 - e. Boundaries describing the area of the spill.
 - f. Whether or not the spill is contained.
 - g. Quantity released (if it can be estimated).
 - h. Environmental Impacts (water bodies, streams, ground, roadways)

4. The Site Leader shall determine based upon the report from the person discovering the spill, whether the circumstances pose a threat to the surrounding community or the environment. If there is any threat to the surrounding community requiring the immediate response of public Emergency Response personnel, the person in charge shall immediately contact 911. The Site Leader shall also contact at least one specialized emergency responders.
5. The Site Leader shall notify the Site Environmental Lead as soon as possible after an Environmental Event has been detected. The Site Environmental Lead shall contact the ES PGD Operations Support Director or Manager and follow the EMS-0300 Environmental Event Response Procedure – 1810251303 to determine regulatory reporting requirements.
6. If applicable, the Site Leader or the Site Environmental Leader shall closely coordinate with the PGD Emergency Response Coordinator, during pre and post event activities.
7. While remaining at a safe distance upwind from the spill/release, the person discovering the spill shall locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any site drains that are near the location of the spill.

Note: This shall be performed only if it is safe to do so without risking chemical exposure.

8. The person discovering the spill shall attempt to barricade, restrict access or otherwise mark off safe boundaries around the spill to prevent others from inadvertently approaching the spill area.

Note: This shall be performed only if it is safe to do so without risking chemical exposure.

9. The person discovering the spill shall remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.
10. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the Environmental Lead shall immediately proceed to the spill area to evaluate severity of the incident.

Note: If any personnel are discovered to be unconscious or otherwise incapacitated upon approach to the spill scene, all personnel shall immediately move upwind away to a safe distance from the unknown threat

11. The Site Leader shall evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform).
12. Once the Leader (or Emergency Coordinator, as appropriate) has determined that adequate containment and barricading of the spill area exists, they shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill and arrange for cleanup/mitigation actions.

APPENDIX 7 GAS PIPELINE EVENT

Fuel Pipeline/Asset events have the potential to cause both safety and environmental risks. It is critical to understand your role and to have scheduled drills to prepare to react if such an incident were to occur.

Note: Natural gas is classed as a simple asphyxiant, meaning it has little or no toxic effects but can bring about unconsciousness and death by replacing air and thus depriving people of oxygen. The table below depicts the actions of the first individual discovering the event.

INITIAL RESPONSE ACTIONS	
ONSITE RESPONSE TEAM	
1. Make an Immediate Assessment of the Incident & take actions to protect life, and ensure safety of personnel. Determine:	<ul style="list-style-type: none">• Type & quantity of material released• Location & status of material released (contained/uncontained)• Status of source: (controlled/uncontrolled)• Status of all personnel/injuries
2. Stop the Discharge & Shutoff Ignition Sources , if safe to do so. (e.g., act quickly to secure pumps, valves, motors, open flames, etc.). If the incident is clearly the result of an operation that the Observer/First Responder can control safely, take immediate steps to correct the operation.	
Warn Personnel – Alert the ROCC for them to complete the notification process & all facility personnel at or near the incident scene. The notifications by the ROCC shall include 911, Corporate Security, VP of Operations, Emergency Response Coordinator. Note: The ROCC will contact PGD Emergency Response Coordinator	
4. Isolate & Secure the Incident Scene - Account for all personnel & evacuate nonessential personnel upwind of the area.	
5. Direct Termination of Appropriate Facility Operations for the safety of personnel if necessary.	
6. Activate Site's Response Plan and all Necessary Response Organizations (i.e., Onsite Response Team; Corporate Response Team; 911 as necessary)	
7. Establish Incident Command Post with the following ICS roles: Command Staff, Finance, Logistics, Operations, and Planning.	

APPENDIX 8 OIL PIPELINE EVENT

The spill or release of oil is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that plant personnel will not respond to spills/releases, but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term “respond” in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of actually stopping the source of a spill.

The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area,

- If it is safe to do so under prevailing conditions, remain within observation distance.
- If safe conditions are in doubt, do not risk exposure – leave the area immediately.

The table below depicts the actions of the first individual discovering the event.

INITIAL RESPONSE ACTIONS	
1. Make an Immediate Assessment of the Incident & take actions to protect life, and ensure safety of personnel. Determine: <ul style="list-style-type: none"> • Type & quantity of material spilled • Location & status of material spilled: (contained/uncontained) • Status of source: (controlled/uncontrolled) • Status of all personnel/injuries 	
2. Stop the Discharge & Shutoff Ignition Sources , if safe to do so. (e.g., act quickly to secure pumps, valves, motors, open flames, etc.). If the incident is clearly the result of an operation that the Spill Observer/First Responder can control safely, take immediate steps to correct the operation.	
3. Warn Personnel – Alert the ROCC for them to complete the notification process & all facility personnel at or near the incident scene. The notifications by the ROCC operator at a minimum shall include 911, Corporate Security, VP of Operations, Emergency Response Coordinator. Note: ROCC shall contact Emergency Response Coordinator	
4. Isolate & Secure the Incident Scene - Account for all personnel & evacuate nonessential personnel from the area.	
5. Direct Termination of Appropriate Facility Operations for the safety of personnel if necessary.	
6. Activate Site's Response Plan and all Necessary Response Organizations (e.g., Onsite Response Team; local environmental services contractor, FPL Corporate Response Team; Fire Department as necessary)	
7. Establish Incident Command Post with the following ICS roles: Command Staff, Finance, Logistics, Operations, and Planning.	

APPENDIX 9 PANDEMIC EVENT

This section addresses the continued safe operation of PGD assets and references the NextEra Energy Business Continuity Plan. Individuals are expected to keep informed through the NextEra Energy communications. Individuals should practice social distancing and safe hygiene practices during high risk events. Travel restrictions may be implemented as part of the containment effort.

During a pandemic outbreak, to minimize the potential transmission of infectious disease in the workplace among essential personnel that must report to a company facility, screening stations and procedures may be implemented at the main entry points of critical company facility.

Visitors:

Visitors to the site shall follow the Pandemic Event site specific plan that can be found on the PGD Emergency Preparedness SharePoint site. ALL visitors to the site shall fill out a Visitor Log Form.

Outside Vendors/ Contractors

Individual sites may deal directly with outside vendors when scheduling appointments and work. ALL outside vendors and contractors shall fill out a Visitor Log Form.

In the unlikely event that a confirmed exposure to a highly contagious disease (declared by the Center for Disease Control or World Health Organization) at the facility in areas such as control room, control centers and/or site O&M buildings is discovered, any of the scenarios and associated actions outlined on Table 1 may be triggered in order to isolate containment. Critical operations will be maintained with reduced staff at critical facilities or at home.

Activation of this plan is triggered by PGD senior leadership approval.

PGD sites work through the PGD business continuity coordinator to ensure all proper communications under the NextEra Energy Corporate Pandemic Plan are completed and proper alignment with corporate guidelines is executed.

Table 1: Potential actions for confirmed infection

Scenario One	Scenario Two	Scenario Three
Evacuate the affected individual and all non-essential workers exposed within the prior 7 days. Any Operations at the On-Site Facilities will follow special transition protocols to allow for cleaning and uninterrupted service. *	Quarantine all affected teammates at the site and shelter in place for 14 days or the applicable CDC recommendation to prevent spread	Evaluate generation need, shut the site down if feasible
All evacuated teammates will be quarantined in their homes for 14 days or the applicable CDC recommendation to prevent spread	Bring in provisions, accommodations and personal protective equipment for teammates	Evacuate all site personnel

Ensure major cleaning of facility in accordance with qualified pandemic removal protocols before individuals are permitted to return to work.	Go to minimum staffing as permitted for 14 days	Conduct major cleaning of facility before individuals are permitted to return to work
As applicable bring in new crews confirmed as not exposed to the contagious disease	Conduct major cleaning of facility before individuals are permitted to return to work	Bring in new crews confirmed as not exposed to the contagious disease to restart the site as generation needs change

*Special transition protocols: Operations will be controlled by ROCC, ROCC FPLCC Backup Center, ROCC Alternate Work Location, or by New Operations Local Crew. New crew entering the facility, must be wearing health care type personal protective equipment (PPE) such as protective clothing (Tyvek suit), gloves, face shields, goggles, facemasks and/or respirators or other equipment designed to protect the wearer from exposure of infection or illness. Concurrently the cleaning vendor will complete the decontamination of the facility, and any other affected areas. Upon completion, the site will transition with a new crew.

Visitors to the site will follow the assigned site plans for Pandemic Event.

Third party contractors experiencing similar challenges, NextEra Energy may consider other methods of supplementing the work force. The temporary hiring of retired employees will be permitted, if the situation demands. This strategy will be particularly useful in those business areas where few individuals are familiar with the job responsibilities and the learning curve for new recruits is high

Provisions/Supplies:

PGD Emergency Preparation Team will work closely with Emergency Response Logistic team ahead of the event to ensure all provisions/supplies are quickly available for delivery.

A plan for acquiring food supplies, large amounts of bottled water, portable bedding, etc. should be tied to the appropriate phase of pandemic progress.

- Purchase orders should be established in advance of an outbreak.
- Emergency contact numbers for critical suppliers should be confirmed and tested.
- Known critical parts on order should be expedited.
- Establish ability to process emergency procurement from remote work locations such as home.
- Additional vendors may be procured through the Emergency Response Logistic Team

Attachment 1: Sample checklist for WHO pandemic stages**Pre and during event:**

- ☐ PGD Emergency Preparedness GM meets with PGD senior leaders to assess possible pandemic threat.
- ☐ Discuss possible staffing constraints within business area and possible workforce pools from which additional personnel can be obtained.
- ☐ Identify and prioritize essential employees.
- ☐ Consider pandemic budget items, volume and cost
- ☐ Consider when or if your business area should establish a cost center and WBS # for pandemic associated expenses.
- ☐ PGD Emergency Preparedness GM establishes regularly scheduled team meetings
- ☐ Evaluate non -essential employees' skill sets for deployment to aid other business units
- ☐ Consider meeting / communicating with business unit employees to assess concerns and needs
- ☐ Contact working pool candidates to inquire about interest or ability to help in the event of a pandemic. These may include non-essential personnel in other departments with desired skill sets, recently retired employees, contractors, etc.
- ☐ Consider timeline for cross training backup workers on critical business processes.
- ☐ Begin considering alternative work shift schedules to lessen exposure vulnerabilities. Decide if and when the new schedules would be implemented, and when the workforce would revert back to standard work schedules.
- ☐ Have employees who travel review the pandemic travel policies.
- ☐ Verify any new pandemic related news and quell any false rumors.
- ☐ Notify employees of possible vacation cancellations if the pandemic reaches the action levels. Vacation cancellation will be at the business area / supervisor's discretion.
- ☐ Identify possible telecommuters.
- ☐ Begin cross training, if it has not already taken place.
- ☐ Test remote access for all personnel designated as telecommuters during a pandemic event.
- ☐ Consider developing a transportation plan for those employees reliant upon public transportation to get to work
- ☐ Initiate any new working schedules and personnel distancing policies.
- ☐ Initiate teleconferencing policies. No large gatherings, minimize personal contact as much as possible.
- ☐ Re -evaluate business process prioritization.
- ☐ If deemed appropriate, have approved employees begin telecommuting.
- ☐ Track all additional costs associated with pandemic response efforts.

Post Event

- ☐ Return departmental manning levels and shifts to their normal configuration.
- ☐ Restock all supplies depleted during the prior wave.
- ☐ Evaluate your business area's plan. Add additional information to the plan to reflect lessons learned.
- ☐ Work with Supply Chain to re -evaluate critical vendors / suppliers

APPENDIX 10 IMMEDIATE SITE EVACUATION PROCEDURE**1. Personnel present in the Administrative Building shall immediately take the following actions:**

- a. Locate and obtain the visitor/contractor sign-in sheet.
- b. Locate and obtain all immediately accessible hand-held radios.
- c. Determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated in Appendix 3) and wind direction. Every site should have an identified off site muster area.
- d. Assign designated plant employees to assist any employees or visitors with special needs that would restrict their ability to get safely and expediently to the muster area.

Note: The primary muster area must be a predetermined location; alternate muster areas are to be selected only when egress routes to the primary muster area are unsafe to proceed along.

2. Pass the following information over the plant radio system:

- a. The muster area the employees will be proceeding to.
- b. Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).
- c. Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area.
- d. Personnel in the Administrative Building should not delay in evacuating, or wait on other personnel that they anticipate may arrive.
- e. Upon arriving at the designated muster area(s), the group shall designate a Person-in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.

1) After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for.

2) The Person-in-Charge will query by radio or cell phone for personnel who are unaccounted for.

3) The Person-in-Charge shall establish radio communication with the Emergency Coordinator (if applicable) and relay information on personnel who are unaccounted for.

3. All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location.**4. The "ALL CLEAR" signal will be communicated by Radio or cellular telephone.****5. The Person-in-Charge shall continuously monitor the plant radio system when at the muster location.****6. Personnel present in the facility operating area (other than Administrative Building) shall immediately perform the following actions:**

- a. If not monitoring the plant radio system, immediately turn on hand-held radios.

7. Proceed to the designated Muster area, unless the egress route to the Muster area is not safe for travel. In such a case, proceed to an alternate Muster area.

8. Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated Muster area.
9. Upon reaching the appropriate Muster area, report to the Person-in-Charge and continue to monitor the plant radio system.
10. If no other personnel are present at the Muster area upon arrival, communicate this to the Site/Plant Leader.
11. Personnel not in the operating areas of the plant (to include the administration building and inside parking areas) shall immediately perform the following actions:
 - a. Locate and obtain all immediately accessible hand-held radios.
 - b. Proceed to the designated Muster area.
 - c. A Person-in-Charge shall be designated for the Muster area. In many cases, this will be the Emergency Coordinator.
 - 1.) In the event that the Emergency Coordinator is in plant operating areas or has proceeded to an alternate muster area, he/she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency.
 - 2.) If the Emergency Coordinator is not present at the muster area, the Person-in-Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives.
 - 3.) The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

APPENDIX 11 DELAYED SITE EVACUATION PROCEDURE

1. Personnel present in the Administrative Building shall immediately perform the following actions:
 - a. Take necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.
2. Locate and obtain the visitor/contractor sign-in sheet
 - a. Communicate names of visitors/contractors currently in the operating areas to outside operating personnel.
 - b. Instruct outside operating personnel to locate and direct all visitors/contractors to proceed to the Administrative Building for egress instructions.
3. When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the Administrative Building, the Site Leader (or Emergency Coordinator, as appropriate) shall designate a trained person to escort all non-essential personnel to the designated Muster area along the safest egress route.
4. Notify the Emergency Coordinator and Production Staff of the current facility status, and evacuation details.
5. Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.
6. Once the shutdown has been completed, all essential personnel shall gather in the Administrative Building and take roll call.
7. When all essential operating personnel are present and accounted for, evacuation to the designated Muster area shall be performed, unless the egress route is not safe for travel.
 - a. If evacuation route to the designated muster area is not safe for travel, proceed to the alternate Muster area.
8. Personnel present in the facility operating areas (other than Administrative Building) shall immediately perform the following actions:
 - a. Continuously monitor the radio system for information and instructions.
 - b. Perform immediate response actions, as appropriate, to place the facility in the most stable condition, based upon the type of emergency.
 - c. Locate and direct non-essential personnel to proceed to the Administrative Building immediately.
 - d. Perform facility shutdown instructions as directed by the Site/Plant Leader.
 - e. Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the Administrative Building for instructions.
9. Personnel not in the operating areas of the facility (to include the administration building and parking areas) shall immediately perform the following actions:
 - a. Locate and obtain all immediately accessible hand-held radios.
 - b. Proceed to the designated muster area (see Appendix12).
 - c. A Person-in-Charge shall be designated for the muster area.
 - d. The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.
 - e. The Person-in-Charge at the designated muster area will coordinate outside responding agency activities and provide assistance (to include personnel, resources, and administrative functions) to the Administrative Building as directed by the Emergency Coordinator and/or Site Leader.
10. The Emergency Coordinator shall immediately perform the following actions:
 - a. Proceed to the Administrative Building, or to the location on the facility most appropriate for directing response actions for the emergency.

- b. Coordinate actions related to the emergency and provide directions to muster area Persons-in-Charge.
- c. In the event that the emergency escalates in severity or immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in plant shutdown activities.

APPENDIX 12 DESIGNATED EGRESS ROUTES & MUSTER AREAS FOR EVACUATIONS

Note: Each plant will designate emergency Muster point(s) for O&M Sites and Solar Field Sites. These are the locations that all employees, visitors and contractors are to report to in the event of an emergency or a drill. Muster points should be identified with proper signage and the site manager should have means of communication. In the event of an emergency the site manager or designee should bring the plant sign in book to the muster point or designate someone to provide the information from the sign in log so that the site manager can account for all employees, contractors and visitors. The location of the Muster areas will be shown to all contractors and visitors as a part of the PGD and site-specific Contractor and Visitor Orientation. Exit routes will be kept clear of clutter, and easily identified.

The Primary Muster Area is located at the **TBD as site is in permitting phase.**

The Alternate Muster Area is located **TBD as site is in permitting phase.**

The Primary Muster Area is the preferred gathering point for personnel, and should be used during evacuations unless the emergency has rendered egress routes to the Primary Muster Area unsafe for travel. The Alternate Muster Area is the alternate gathering point for such circumstances.

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APPENDIX 13 PERSONNEL INJURIES AND SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions that shall take in the event of emergencies related to personnel health.

Although facility personnel should take the most aggressive response actions that are prudent in an emergency situation, the first action will be to call 911 to initiate the response of outside medical responders.

To prepare facility personnel for such contingencies, it will be the PGD policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation), Bloodborne Pathogens and in the use of an AED (Automated External Defibrillator) if one is available.

Each site will maintain at least one well stocked first aid kit at the O&M building and one in each site vehicle. These will be inspected at least monthly. Each plant will determine the locations of their nearest non-emergency Workers' Compensation approved medical facility as well as the Occupational Nurse and post the name, address and phone number. In the event of an emergency, the 911 responders will determine the best location for emergency care.

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Summary: Response to Staff's Second Data Request dated January 31, 2022
electronically filed by Teresa Orahoad on behalf of Dylan F. Borchers