

November 30, 2022

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3797

Re: Case Nos. 19-1881-EL-BGN and 21-508-EL-BGA - In the Matter of the Application of Madison Fields Solar Project, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Madison County, Ohio.

Certificate Compliance Condition 1 – Emergency Response Plan

Dear Ms. Troupe:

Madison Fields Solar Project, LLC's ("Applicant") is certified to construct a solar-powered electric generation facility in Madison County, Ohio, in accordance with the orders issued by the Ohio Power Siting Board ("OPSB") in Case Nos. 19-1881-EL-BGN and 21-508-EL-BGA on January 21, 2021, and October 21, 2021, respectively.

At this time, the Applicant is filing the attached Emergency Response Plan in compliance with Condition 1 of the Joint Stipulation and Recommendation approved by the OPSB's January 21, 2021 order in Case No. 19-1881-EL-BGN (Page 49 of the Application Narrative). This information was provided to the Staff of the OPSB on November 29, 2022.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik

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4872-7908-8641 v1 [88534-2]



Madison Fields Solar Project

Emergency Response Plan

September 12th 2022	Rev 0
Created By	Approved By
Russell Woods	
HSSE Lead – Savion	

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1.0 INTRODUCTION

The 180MW_{AC} Madison Fields Solar Project (“Madison Fields Solar” or the “Project”) is a utility-scale solar development project in Pike Township in Madison County, Ohio, located near the communities of Rosedale to the east and Mechanicsburg to the west. The Project will interconnect to the existing 138 kV First Energy transmission line between the Broadview and Tangy substations.

Madison Fields Solar is scheduled to begin full construction in December 2022 and commence commercial operations during December 2023.

2.0 PURPOSE

This Emergency Response Plan (“ERP”) is written as a guideline for Madison County emergency services to agree on a planned response to emergency situations as may occur on site from time to time during the normal course of operation. During “Construction” the designated EPC contractor will develop their own ERP as per contractual agreement with Savion. As the project transitions to the Operations & Maintenance (O&M) phase, this document will be used by the designated O&M contractor to enhance the development of their ERP that will ensure all potential emergencies are identified and managed as per their HSSE & MS.

Additionally, the ERP is intended to comply with Ohio Revised Code (ORC) 5727.75v1 (F)(5) to *“Provide or facilitate training for fire and emergency responders for response to emergency situations related to the energy project and, for energy projects with a nameplate capacity of five megawatts or greater, at the person's expense, equip the fire and emergency responders with proper equipment as reasonably required to enable them to respond to such emergency situations.”*

The ERP provides guidance on:

- Key Personnel and Responsibilities
- Facility Information and Location
- Emergency Preparedness
- Communication

3.0 DEFINITIONS

- a. **Evacuation:** Is a controlled egress of all persons including contractors and visitors from the site. In cases of evacuation, it is assumed that O&M staff will be available to coordinate the evacuation operation.
- b. **Escape:** Is when egress from the site must be undertaken in a rapid timeframe to avoid a major hazard. In cases of escape it is assumed that the site will be immediately vacated, and staff will not be available to coordinate ongoing operations. This level of response could be necessary if an immediate life threatening situation exists.

- c. **Rescue:** Is the recovery of persons after they have Escaped from a hazardous situation or environment. This document assumes that persons can drive off site to a place of safety (muster point) and will not need to be rescued.

Escalation will normally be initiated via a 911 call to emergency services through 24hr Monitoring Center/ Public or O&M Contractor.

Emergency plant shutdown procedures should be implemented prior to site evacuation only if facilities are threatened. This would involve de-energizing of the main power transformer, followed by the inverters. A further request to de-energize the transmission line may be required depending on severity and location of the emergency event. These procedures will be facilitated by the O&M Contractor/24hr Monitoring Center or Competent Individual. Although this is one method of isolation the O&M Contractor may deploy other methods to ensure overall safety based on the emergency scenario.

The information and visitor log shall be used to account for persons during roll call.

4.0 RESPONSIBILITIES

- a. The Asset Manager (“AM”), or designee, has overall responsibility to ensure the development, revision and implementation of emergency plans by the O&M Contractor.
- b. The O&M Contractor is responsible for execution of these plans.
- c. The O&M Contractor is responsible for annual drills; ensuring all outside organizations are notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan.
- d. All project personnel will be trained regarding fire routes, exits, storm shelters, the location and use of emergency equipment, and understanding and following these plans. All personnel who have contractors or visitors at the site shall ensure that they are familiar with these plans.

5.0 HAZARDS

During the development and operation of Madison Fields Solar, the exposure to potential emergencies such as fire, natural disasters, injury and incident may occur. This ERP is tailored using area-specific hazards and risk assessments. Madison Fields Solar has coordinated with Madison County Emergency Management Agency, Pleasant Valley Fire Department, Mechanicsburg Fire Department, and Pike Township to determine the training and equipment needed for local emergency response services.

6.0 PREPAREDNESS

The ERP will be managed and maintained by the AM and Madison Fields Solar O&M staff to ensure the correct implementation of the ERP should an emergency occur. During this phase, Madison Fields Solar will develop plans and operational capabilities to improve the effectiveness of the site's response to emergencies. Duties of the O&M staff will include:

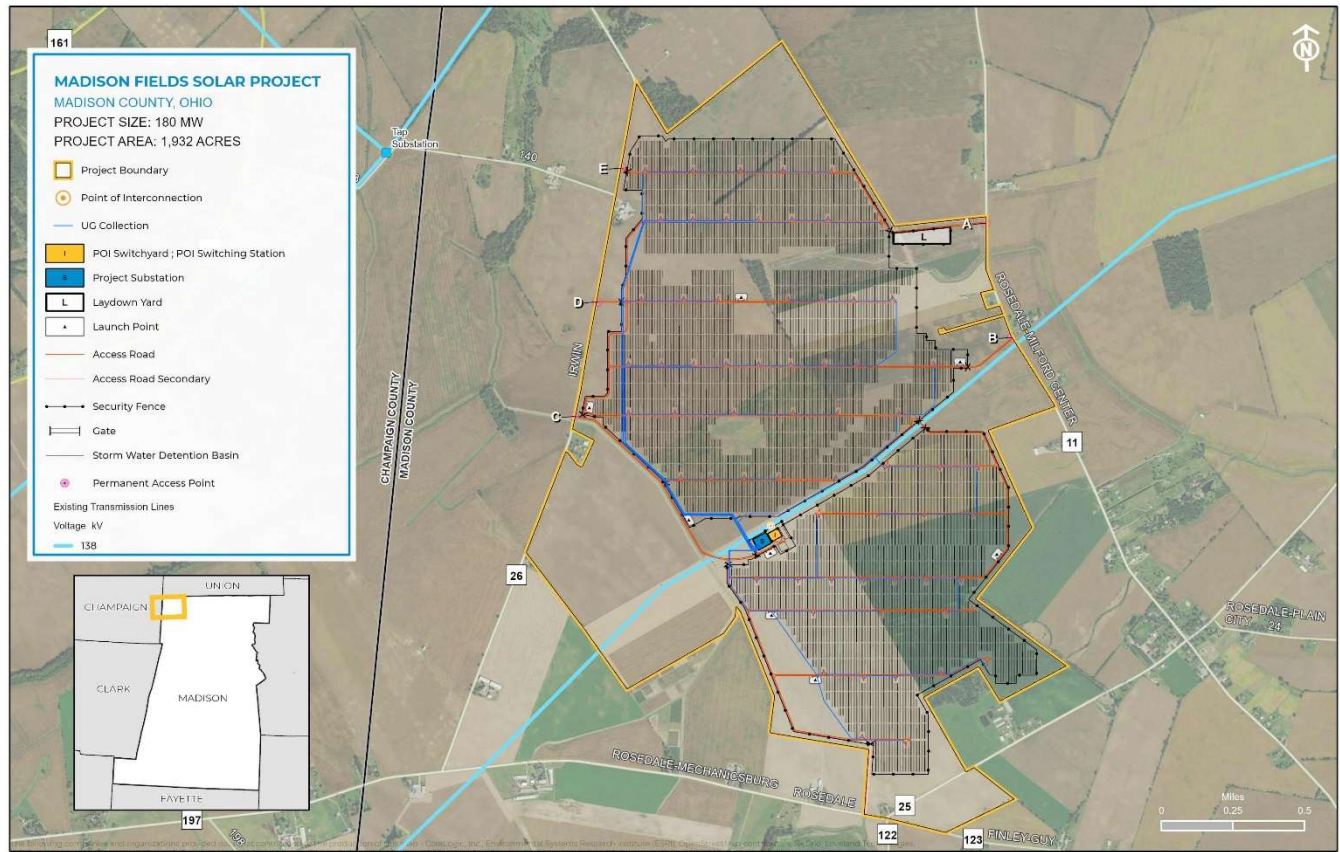
- Develop and maintain emergency plans and procedures, including the ERP.
- Train and liaise with emergency response personnel.
- Train onsite personnel.
- Conduct regular drills and exercises.

Madison Fields Solar has coordinated with local emergency response personnel on the design of the solar facility and access for emergency responders.

- Fire apparatus access roads are at least 16 feet wide.
- For long access roads, pull-out lanes are provided and marked as required by local fire chiefs.
- An emergency lock box entry system (Knox box or similar) shall be installed at each access point and/or entry gate. Before they are installed, such system shall be agreed upon and approved by the Mechanicsburg and Pleasant Valley Fire Chiefs.

The facility is fenced and gated to limit access by the general public. Signage will be installed and maintained at each access point. Signs will be made of weather resistant material, clearly visible at that access point, and on a dark background with contrasting letters or numbers that are easy to read. The signs will also include the access point label as described below.

The site includes five permanent access points, designated A, B, C, D, and E starting from the northeastern most access point along Rosedale-Milford Center Road and moving clockwise around the site. These are shown in the map below.



7.0 PROCEDURE

7.1 Site Evacuation

Circumstances giving rise to evacuation of site include but are not limited to:

- A situation which has the capacity to threaten personnel safety.
- Advice to evacuate from another authority: e.g. County Sherriff's Dept. or Fire Dept.

In the event of a Site Evacuation, the O&M staff will:

- Initiate the evacuation procedure by reporting an emergency via VHF radio (emergency channel) and request all persons to report to the muster area for roll call.
- If required, implement emergency plant shutdown procedures.
- Identify the safest evacuation route and method. This will include:
 - Identification of a muster point near the Project
 - Identification of transport requirements from Project to the muster point.
 - Onward transportation requirements (if required).
 - Identification of GPS co-ordinates for the identified muster point.

- d) Request assistance for evacuation transportation if persons are injured.
NOTE: this will normally be via 911.
 - Provide details of injured persons to be evacuated (number and severity of injury).
- e) Perform a roll call of all persons expected to be at the muster point.
 - Photograph and take visitor logs for the day to be used to identify persons on site.
- f) Communicate with emergency services as indicated in the following relevant sections.

7.2 Life Threatening Scenarios/Injuries

The decision to escape from the Madison Fields Solar O&M building will be taken by the onsite O&M staff based on information immediately available. Circumstances giving rise to escape from the Madison Fields Solar would be:

- An immediate life-threatening situation from a natural disaster event or catastrophic failure of plant.

The onsite O&M staff will:

- a) Assess the emergency and identify a place of safety (muster point) outside the gates of the solar farm.
- b) Initiate the escape procedure by reporting an emergency via VHF radio (emergency channel) and request all persons to report to the muster point.
- c) If required initiate emergency plant shutdown procedures.
- d) Proceed to the muster point with a photograph of the daily site activity board and the daily visitor log.
- e) Perform a roll call of all person(s) expected to be at the muster point.
- f) Request assistance for evacuation transportation if persons are injured.
NOTE: this will normally be via 911.
 - Provide details of injured persons who will need to be evacuated (number and severity of injury).
- g) Communicate with emergency services as indicated in the following relevant sections.

7.3 Fire

Madison Fields Solar is coordinating with local emergency response organizations to determine most effective response for a Fire Emergency. The AM/24hr Monitoring /O&M Contractor or local passerby will use 911 as the immediate first call.

The AM/O&M staff with the assistance of the Emergency Response staff, if on site will use the guidance provided below:

- a) At no time will the facility and equipment be put above safety of the people

operating the facility or at neighboring properties. With that in mind our general guidance will be as such:

- Assess the emergency and identify a place of safety (muster point/staging area) outside the gates of the solar farm.
 - Emergency Responders will determine the best course of action in response to fire to equipment or wildfire with the goal to contain the fire within boundaries of the fence line and limit damage to equipment where possible.
- b) Electrical Isolation of the facility will take place remotely, if possible. If not, the ability to manually isolate will be assessed by O&M contractor/ Competent Person. If isolation cannot be achieved, emergency response staff will be informed.

7.4 Exercise and Training

The O&M Contractor will carry out emergency response drills on an annual basis, including confirmation of all emergency supplies in coordination with all external departments involved with the execution of this ERP.

7.5 Emergency Communication Strategies

In the case of an emergency, O&M Contractor provides the following means of emergency communication:

- **Cellular Phones/Texting:** Staff personal cell phones will be used as available to communicate externally.
- **Two-way Radios:** These radios may be used internally and externally with O&M staff for every-day communications. These radios will be a means of communication to report any emergency service personnel such as the Fire Dept, County Sheriff, etc.

8.0 REPORTING

All emergencies shall immediately be reported to the AM as per contractual timeline.

9.0 ALL CLEAR

When required, the AM or O&M staff shall consult with Emergency Services before announcing an all clear which would signal those persons can return to the Madison Fields Solar.

10.0 EMERGENCY CONTACT LIST

Contact Name	Emergency line	Non-emergency Line
Asset Manager	During construction: 888-766-4550 During operation: 614-733-9935	During construction: 888-766-4550 During operation: 614-733-9935
O&M Contractor <i>To be included when O&M Contract executed</i>	TBD	TBD
Madison County Emergency Management Office Deputy Director: Deb Sims	911	740-852-4200
Champaign County Emergency Management Agency Director: James Freeman	911	937-484-1642
Pleasant Valley Fire Department Fire Chief: Mark Kidd	911	614-873-4067
Mechanicsburg Fire Department Fire Chief: Bob Keene	911	937-834-2506
Madison County Sheriff E-9-1-1 Coordinator: Matt McCann	911	740-852-1212 740-852-1332

11.0 LOCATION

Madison Fields Solar addresses and their locations are included below.

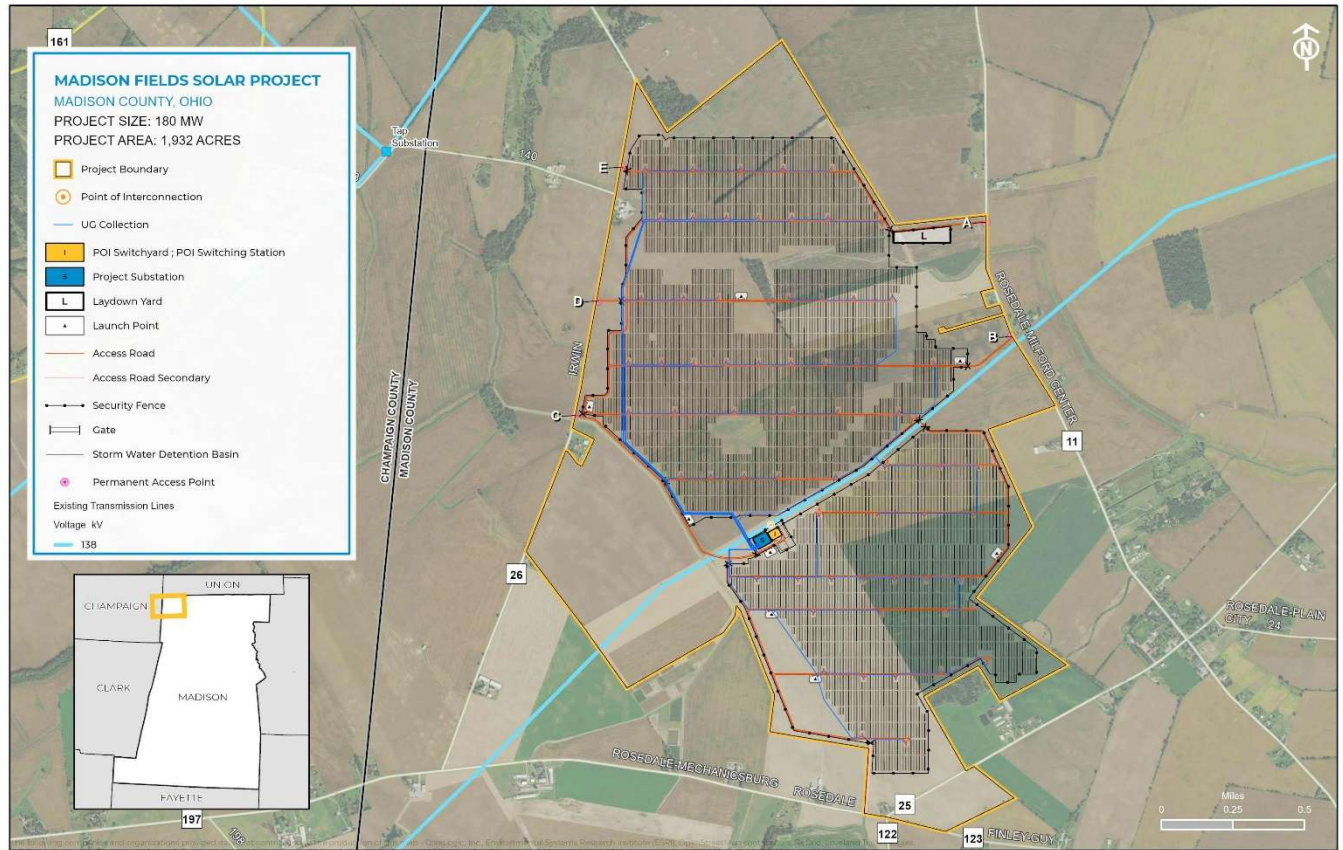
Access Point A:

11350 Rosedale Milford Center Road
Irwin, OH 43029

Access Point C:

10655 Irwin Road
Irwin, OH 43029

Site Map



Hospital

Memorial Health – Urbana Hospital

1958 East US Highway 36

Urbana, OH 43078

← from Pike Township, Ohio
to 1958 E US Hwy 36, Urbana, OH 43078

18 min (13.7 miles)

via OH-29 W/E State Rte 29

Fastest route now due to traffic conditions

Pike Township

Ohio

↑ Head south on Irwin Rd toward Rosedale Rd

1.3 mi

↪ Turn right onto Rosedale Rd

2.4 mi

↪ Turn right onto OH-29 W/E State Rte 29

9.4 mi

↪ Turn right onto S Dugan Rd

0.5 mi

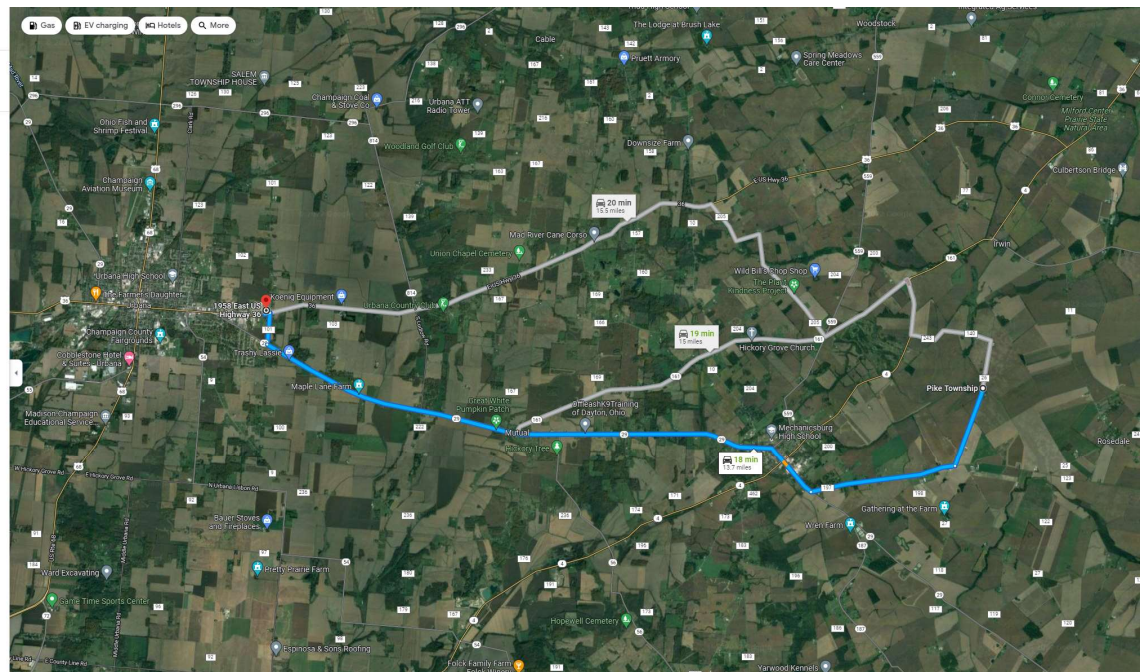
↪ Turn left at the 1st cross street onto US-36 W

Destination will be on the right

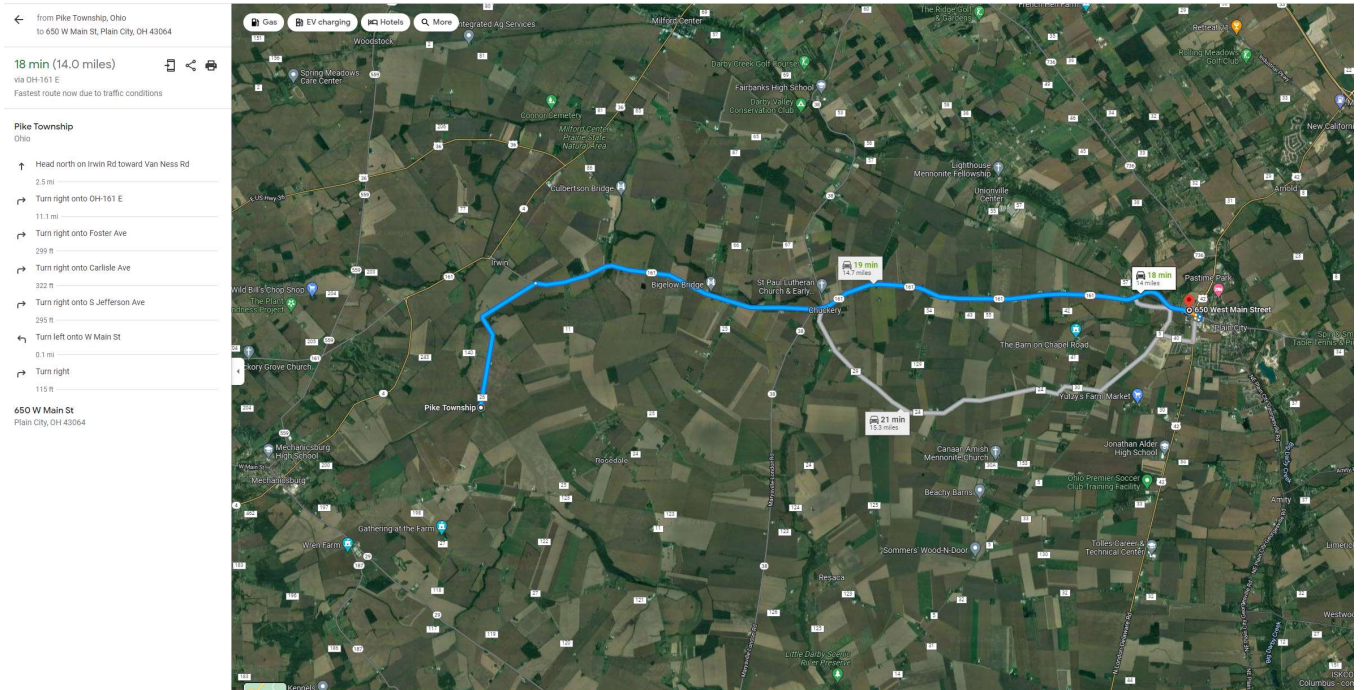
486 ft

1958 E US Hwy 36

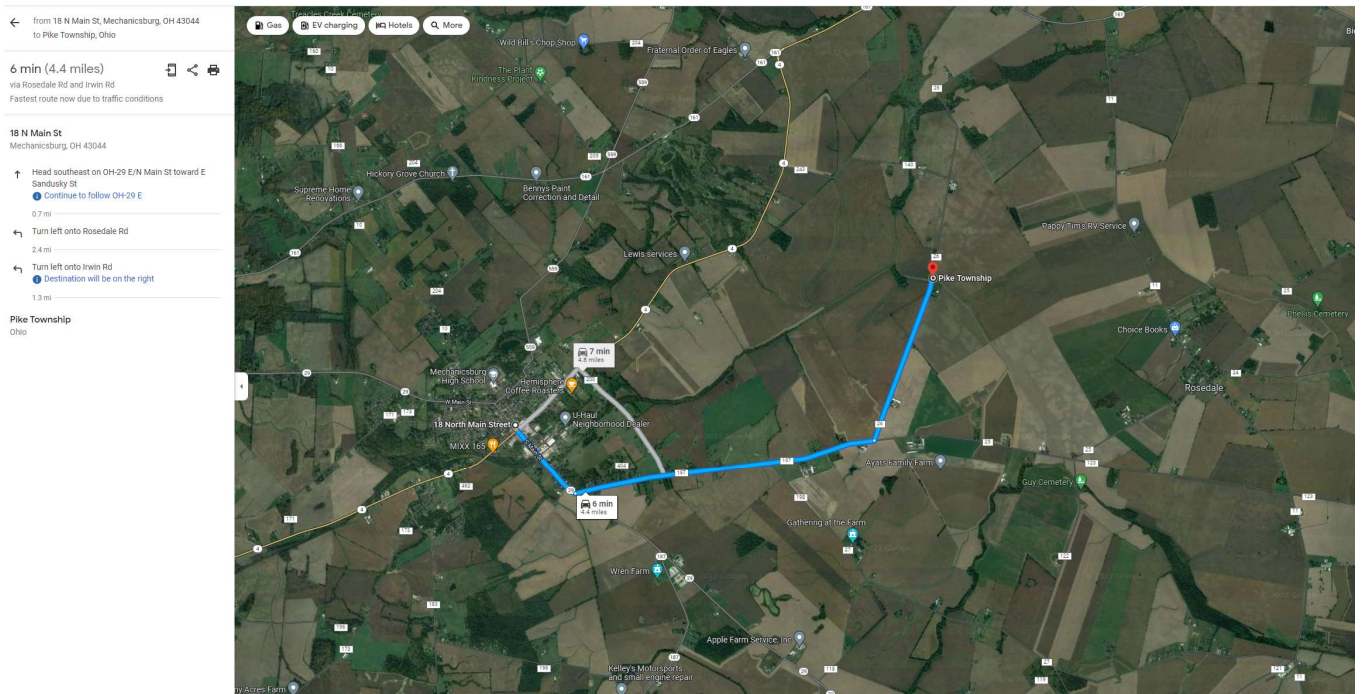
Urbana, OH 43078



Pleasant Valley Fire Department
650 W. Main Street
Plain City, OH 43064



Mechanicsburg Fire Department
18 N Main Street
Mechanicsburg, OH 43044



**This foregoing document was electronically filed with the Public Utilities
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in

Case No(s). 21-0508-EL-BGA, 19-1881-EL-BGN

Summary: Notice - Certificate Compliance Condition 1 – Emergency Response
Plan electronically filed by Christine M.T. Pirik on behalf of Madison Fields Solar
Project, LLC