Bluestone Wind Project
Site Security Plan

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1. Purpose

This Site Security Plan ("the Site Security Plan" or "Plan") identifies the site-specific requirements to create and maintain a secure Project Site ("Site")[1] during both construction and operation. The Calpine Physical Security Standard (*See* EHS – 15) ("Calpine Standard Plan") supplements this Plan, and Bluestone Wind, LLC ("Bluestone Wind") must comply both with the requirements in the Calpine Standard Plan and the specific requirements of this Site Security Plan.

The purpose of this Site Security Plan is to support a safe work environment by implementing security measures and minimizing unauthorized access to the Project during construction and operation.

2. Responsibilities

2.1. Project Site Management

The Project Manager is responsible for:

- Ensuring and verifying compliance with all aspects of (1) the Calpine Standard Plan, (2) this Site Security Plan, and (3) all applicable federal, State and local laws; and
- Ensuring that Project personnel receive the appropriate training required by this Site Security Plan.

2.2. Employees and Contractors

Employees and contractors are responsible for reporting all security incidents immediately to their supervisor or the Project Manager.

2.3. Corporate Environmental, Health and Safety (EHS) and Security

Calpine Corporate EHS and Security is responsible for approving any changes to this Site Security Plan and any other site-specific physical security requirements.

2.4. Information Technology Services

Calpine Information Technology Services is responsible for:

- Supporting the installation of site access controls, such as monitoring and security management systems; and

[1] Project Site is defined here to include the land owned or leased by Bluestone Wind upon which the Project is located, and all Project components, including access roads, collection lines, turbines, the operation and maintenance (O&M) building, the collection substation, and the point of interconnection (POI) substation. Upon completion, the POI substation will be deeded to NYSEG and Bluestone Wind will no longer be responsible for site security.

- Supporting upgrades and maintenance as deemed necessary and required by North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) policies and procedures.

2.5. Compliance and Legal Department

The Calpine Compliance and Legal Department is responsible for:

- Supporting ongoing compliance evaluations, incident investigations, and audits of physical security matters as they relate to the Project;
- Monitoring the assignment of the NERC CIP Senior Manager and advising Calpine senior leadership regarding re-assignment requirements, if necessary, as they relate to the Project; and
- Monitoring and reviewing the ongoing implementation of the required activities for the Project to meet CIP requirements.

2.6. Regional Vice President

The Regional Vice President is responsible for overseeing implementation of this Site Security Plan.

3. Physical Security

3.1. Communications

Communications with employees and contractors will be critical to ensuring a safe work environment during both the construction and operations phases of the project. Each employee and contractor who is working at the Project will be required to carry a two-way radio. Cell phone coverage may be limited in the Bluestone Wind project area, so alternative forms of communication will be needed. The two-way radios supplied to employees and contractors will be capable of:

- Providing immediate emergency instruction to personnel; and
- Notifying proper personnel of a security incident.

Calpine will work with the Engineering, Procurement and Construction (ECP) contractor to develop a program for ensuring proper communications during construction, including identification of procedures and equipment for summoning emergency assistance from State or local authorities. During Project operation, requests for assistance may be made directly via cell phones (assuming that option is available) or transmitted via two-way radio to the Control Room Operator.

3.2. Construction Security

To reduce safety and security concerns during construction, public access to the Project will be limited. The contractor will be required to provide a final site security plan for construction, which will be developed by the contractor selected to lead the construction of the Project (i.e., contractor) post

certification. Preparation of the final site security plan will begin immediately following selection of the BOP contractor, and the final plan will be provided to the Siting Board upon completion.

Access Controls

The public will not be allowed on the Site during construction. Access will be restricted by locked gates, other barriers, and/or signage as appropriate. After hours, vehicular access to active portions of the Site will be blocked by parked equipment or temporary fencing. Temporary construction fencing or other visible barriers will be placed around excavations that remain open during off hours.

A log of all personnel visiting, entering, or working on the Site will be maintained. Visitors will be required to attend the site orientation/safety training provided.

Electronic Security and Surveillance Facilities

Trespassing is generally not an issue during construction of wind power projects. Therefore, electronic security and surveillance is not currently proposed for the Site. However, if problems arise, video cameras or other surveillance technology may be set up to monitor activity during construction.

Security Lighting

Security lighting activities associated with Project construction will include lighting of the staging areas and areas immediately around the office trailers. Lighting will be directed downward where possible to minimize the effects of light pollution and will be reduced to the maximum extent practicable to minimize potential wildlife attraction. Construction that takes place outside of daylight hours will include the lighting necessary to allow for safe construction activities while at the same time reducing off-site light pollution to the maximum extent practicable.

A detailed Facility Exterior Lighting Plan ("Lighting Plan") will be submitted as a compliance filing for review and approval no later than 30 days prior to the commencement of construction. The Lighting Plan will address:

- Security lighting needs at wind turbine sites, collection and POI substation sites, O&M building site, and any exterior equipment storage yards;
- Plan and profile figures to demonstrate the lighting area needs and proposed lighting arrangement at the collection and POI substation sites, the O&M building site, any exterior equipment storage yards, and typical figure(s) for wind turbine sites;
- Lighting design that will provide safe working conditions at appropriate locations;
- Exterior lighting design that will avoid off-site lighting effects by:
    - using task lighting as appropriate to perform specific tasks; task lighting will be designed to be capable of manual or auto-shutoff switch activation rather than motion detection;

- requiring permanent exterior lighting, other than turbine door safety lighting, to be full cutoff fixtures, with no drop-down optical elements that can spread illumination and create glare.

Setback Considerations

Project setbacks, in association with the access controls discussed in Section (a)(1) above and periodic security measure inspections, should ensure adequate safety and security during construction of the Project.

3.3. Operational Security

It is anticipated that the Applicant will own and operate the Project, except for the POI substation, which will be owned and operated by NYSEG. Therefore, the Applicant will be responsible for safety and security during operation of the Project, excluding the POI substation.

Access Roads

All access roads that are not public will be posted with "No Trespassing" signs to limit and deter public access to the Site and wind turbine locations. Bluestone Wind will install gates with locks at the entrances to access roads if requested by their landowner under their Lease Agreement. All contractors must inform the Project Manager of the portion of the Site they intend to visit and the approximate date and time. If unauthorized access and/or vandalism is found to be a problem, intrusion detection devices (e.g., security cameras) and/or additional gates will be installed, as necessary.

O&M Building

The O&M building will be strategically located to allow access to all turbine locations. The building will contain necessary tools and equipment required to conduct routine maintenance on the wind turbines and associated facilities. The O&M building will be locked when not in use and secured with an alarm system to deter intruders. If unauthorized access and/or vandalism is found to be a problem, intrusion detection devices (e.g., security cameras) and/or other security equipment will be installed, as necessary.

The O&M building will be equipped with lighting to promote security and safe operation. Lighting will be designed in consideration of required ingress and egress during emergency situations. The lighting on this and all buildings will also be designed to minimize the impact on the environment. Lights will be angled downward to reduce glare and visibility from a distance and will be turned off when not in use, either manually or using motion sensors, heat sensors, timers, or other automatic means.

Wind Turbines

The wind turbine access doors will be closed and locked except when employees or contractors are inside the wind turbine. Signs will be posted at every wind turbine location indicating that it is a federal

offense to damage wind turbines. “No Trespassing” signs will also be posted to inform people that only authorized access is allowed. If vandalism and trespassing become a problem, intrusion detection devices will be installed, as necessary.

Turbine doors will be equipped with lighting to promote security and safe operation. Lighting will be designed in consideration of required ingress and egress during emergency situations. The lighting on this and all buildings will also be designed to minimize the impact on the environment. Lights will be angled downward to reduce glare and visibility from a distance and will be turned off when not in use, either manually or using motion sensors, heat sensors, timers, or other automatic means.

Lighting on turbines and meteorological towers will comply with Federal Aviation Administration (FAA) regulations and will follow specific design guidelines to reduce collision risk.[2] It is the standard procedure of the FAA to stipulate that warning lights be installed on all turbines until the final Project layout has been established. It is anticipated that the final lighting plan will reduce the numbers of turbines requiring lighting to approximately one-third of the total number of Project turbines, which is typical for a wind energy project. The final lighting plan will ultimately be approved by the FAA and will therefore ensure aircraft safety. The turbine lights must conform to FAA’s December 4, 2015 Advisory Circular 70/7460-1L or as updated, specifically Chapter 13 (Marking and Lighting Wind Turbines), which requires the use of FAA L-864 aviation lights.

Substations

The collection substation, which will be owned and maintained by Bluestone Wind, will be fenced with an 8-foot fence with three rows of barbed wire on top. The access gate will be locked, and access will be granted only to authorized personnel. An alarm system and a surveillance camera will be installed; the camera will be remotely monitored to detect unauthorized access. Emergency responders will be notified in the event of an unauthorized access emergency.

As previously noted, once constructed, the POI substation will be owned and operated by NYSEG, which will be responsible for implementing necessarily site security measures.

Both substations will be equipped with lighting to minimize impact to the environment while promoting security and safe operation. The lights will be angled downward to reduce glare and visibility from a distance.

[2] The Project will comply with the requirements imposed by the FAA. This preliminary Site Security Plan will be revised, as necessary to conform to any terms and conditions imposed by the FAA.

Setback Considerations

Project setbacks, in association with the access controls discussed in Section (b)(1), the security lighting discussed in (b)(3), and periodic inspections of security measures, should ensure adequate safety and security during operation of the Project.

4. Information and Cyber Security

4.1. Information Security

All confidential Project information will be handled in accordance with the Calpine Information and Technology Services Information Protection and Handling Standard. Information systems will be secured using industry standard access restriction protocols.

4.2. Cyber Security

Bluestone Wind will comply with all NERC reliability standards applicable to the Project. Physical access to critical cyber infrastructure areas will be restricted to those individuals who must have access, as determined by the Project Manager. Access rights will be periodically reviewed and modified, as appropriate, by the Project Manager. When feasible, access into cyber secured restricted areas will be monitored by Calpine employees or video surveillance. Periodic validation of compliance with the applicable standards by an independent auditor will be carried out as required by 16 NYCRR § 1001.18(b)(6).

In addition, Bluestone Wind has developed several policies that address strong password encryption, two factor authentication, an incident response plan and playbook, as well as off-site storage of log files and backup of critical assets.

5. Response to Security Incidents

Procedures for responding to security-related incidents/emergencies are included in the Bluestone Wind Emergency Action Plan (EAP). These incidents include, but are not limited to:

- Suspicious persons/trespassers
- Bomb/terrorist threats
- Active shooter situations or other violence
- Vandalism/sabotage.

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6. Inspections and Recordkeeping

6.1. Security Compliance Checklist

The Site EHS Specialist will be responsible for completing a Security Plan Compliance Checklist at least once annually. The EHS Specialist will ensure that any corrective actions required are promptly completed and the resolution of the corrective actions is documented. In addition, inspections will be conducted periodically during Project construction and operation to ensure that site security measures are being properly implemented.

6.2. Document Retention

The site will maintain the documents listed in the following table for the period listed therein.

Document Name	Description/Purpose	Retention
Site Security Plan	Plan development to ensure that security measures are applied and maintained to protect Project personnel, property, and equipment	While the plan is in effect
Security Plan Compliance Check List (Appendix A)	A checklist of major plan compliance items	Past two checklists

7. Education and Training

All Bluestone Wind-affiliated workers – both during construction and operations – will be trained on the Site Security Plan and will be responsible for implementing those aspects of the plan that are applicable to their work. The Site Security Plan will be made available for site employees to review and use.

Bluestone Wind will engage all site employees with ongoing cybersecurity awareness training and testing on an annual basis.

8. Updates to the Site Security Plan

This Site Security Plan will be reviewed annually and updated as necessary. The Project Manager will determine who reviews the Plan.

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