APPENDIX 6-A

Site Security Plan

Highest standards

Matter No. 21-00026

Town of Somerset

Niagara County, NY

Appendix 6-A

Site Security Plan

March 2023

Contents

1. Purpose

Somerset Solar, LLC (the Applicant), a subsidiary of The AES Corporation, Inc. (AES), is proposing to develop the Somerset Solar Facility (the Facility), a solar energy generation facility with a nameplate capacity of 125 megawatts (MW) on portions of the former Somerset Station coal-fired power plant site and adjacent parcels (comprising approximately 1,396 acres of privately-owned land) in the Town of Somerset, Niagara County, New York (Project Site). The limit of disturbance for the Facility is approximately 696 acres (Facility Site).

The Facility Site is located within the Town of Somerset, Niagara County, which is situated south of Lake Ontario, approximately 13 miles northeast of the City of Lockport. The Facility Site will utilize portions of the former coal power plant property located north of New York State Route 18/Lake Road consisting of previously developed and disturbed industrial land, as well as agricultural land and forested habitats.

The Facility consists of photovoltaic panels installed on low-profile racking systems mounted on poles driven directly into the ground or installed on ballast foundations as necessary. Inverters, which collect the electricity from the panels and convert it from direct current to alternating current, will be installed throughout the Facility Site, and connect to the Somerset Collector Substation (Facility Substation) via both underground and aboveground electrical collection lines. The Facility Substation will connect to the existing Kintigh Substation located on the Project Site and step up the electrical power from the inverters to match the voltage of the electrical grid and tie in via New York State Electric and Gas Corporation's existing Somerset Tap transmission line located immediately adjacent to the Facility Site. The gen-tie transmission line interconnection line that will connect the Facility Substation to Kintigh Substation is limited to a 159-foot section of overhead line containing a take-off structure, an interconnection line pole, and another take-off structure at Kintigh Substation. A protective fence will surround the Facility.

The Facility Site will be accessible via multiple gated entrances from publicly maintained roads as well as several proposed access roads. Additional site access and traffic details are located in Exhibit 5 and Exhibit 16 of the Section (§) 94-c Application.

2. Site Security Features

2.1. Access Controls

Facility components will be enclosed with a chain link fence during both construction and operation of the Facility. The Facility Site will be accessible to Facility personnel, including construction contractors, via multiple locked gates. Gates will be outfitted with a "Knox Box" type locking system (or similar) to allow Facility access by emergency personnel. Signage will be posted on the chain link fence stating it is a federal offence to damage property at an energy-generating facility and that no trespassing is allowed. Signage will also include a warning of possible hazards and include emergency contact information. Additional access controls are not anticipated for the Facility. Gates will not be unlocked unless AES or authorized personnel are present on the Facility Site. Additionally, office trailers will remain locked during non-working hours. Details on fencing and gates are included in the Design Drawings in Appendix 5-A (Sheets PV-C.09.01–PV-C.09.04) of the §94-c Application for the Facility.

3. Electronic Security and Surveillance

Electronic security or surveillance facilities are not anticipated to be required during construction. All Facility Site personnel, contractors, and visitors will be required to check-in at the main construction operations office or trailer in order for the Applicant to keep a record of visitors.

Security cameras will be utilized at the Facility Substation for additional security during operation of the Facility. Surveillance monitoring will occur 24 hours a day and live monitoring will be conducted by the AES Control Center located in Salt Lake City, Utah. When unanticipated activity is detected outside of working hours, the AES Control Center will call the Facility's operations and maintenance manager (AES Facility O&M Manager) or designee, and the local Sheriff's department/emergency services, as necessary. Daily reports will be maintained by the AES Control Center for all Facility Site activity.

4. Security Lighting

The Facility will utilize manually operated exterior lighting as necessary during operation of the Facility. Security lighting will be installed only at the Facility Substation. The lighting will be strategically placed around the Facility Substation to emphasize worker safety during operation of the Facility. The Design Drawing in Appendix 5-B, Sheet HV-P.13.01 details the lighting plan and

specifications for proposed lighting is provided in Appendix 5-E of the §94-c Application.

Security lighting will be maintained at the minimum levels needed to accomplish the associated task and will only be used when necessary to avoid trespassing from occurring on the Project Site. Visual disturbances will be minimized by the strategic lighting placement and limited lighting use, while providing adequate security for the Facility.

Electricity for the security lights will be provided from the station service power and from a distribution line from the local utility for emergency backup power. Full cut-off fixtures and task lighting will be used at the Facility Substation where feasible, as specified on the lighting plan in Appendix 5-B (Sheet HV-P.13.01) of the §94-c Application. The majority of Facility construction work will be conducted during daylight hours. If additional lighting is needed for specific tasks, temporary manually operated lighting will be brought in and will only be utilized during active work periods in specific locations. No security lighting is proposed for the Facility during non-construction work hours.

5. Lighting for Aircraft Safety

Based on the Federal Aviation Administration Notice of Criteria tool review for the Facility, the proposed Facility is not anticipated to compromise aircraft safety. The Facility does not include the installation of components greater than 200 feet in height; therefore, aircraft obstruction lighting is not applicable or required, and no additional consultation with the Federal Aviation Administration is required to be performed.

6. Cyber Security

The Application will ensure protection of digital computer and communication systems in accordance with the Federal Department of Commerce's National Institute of Standards and Technology, the North American Electric Reliability Corporation (NERC), and/or International Organization for Standardization, as applicable.

The Applicant will ensure protection of digital computer and communication systems in accordance with the Federal Department of Commerce's National Institute of Standards and Technology, the NERC, and/or International Organization for Standardization, as applicable. The Applicant implements rigorous standards and guidelines that are aligned with the Global Technology Policy and Information Technology General Controls catalog, that provide the basis for Sarbanes-Oxley

compliance, as well as with the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity. The Applicant identified the following cyber security controls:

- Identify – Controls that support the identification and prioritization of AES assets, risks, and risk mitigation techniques;
- Protect – Controls that limit or contain the impact of potential cybersecurity events;
- Detect – Controls that support the timely discovery of cybersecurity events; and
- Respond & Recover – Controls that contain the impact of cybersecurity events and facilitate timely recovery to normal operations.

Cyber security guidelines that provide AES with a foundation for protection, detection, response, and recovery capabilities include the implementation of network security architecture; internet firewalls, business network firewalls, and control system network firewalls; the maintenance of a network device inventory and a software inventory; employment of malware defenses; assessment of vulnerabilities and patch management; development of an incident response plan; filtering of web content; protecting traffic flooding; and conducting penetration testing. Other cyber security guidelines established by AES include access control, change management and program development, operations management, data flow, remote access, and cyber-safety and awareness. Guidelines were developed in conjunction with the following cybersecurity models: the Electrical Subsector Cybersecurity Capability Maturity Model (ES-C2M2); the Cybersecurity Council/SANS 20 Critical Security Controls (CSCs) for Effective Cyber Defense (SANS 20); and technical guidance developed by NIST and the U.S. Department of Homeland Security Industrial Control Systems Cyber Emergency Response Team (ICS-CERT).

Periodic independent cyber security audits will be conducted annually to validate the Facility's compliance with current standards. Third party providers will be sought out to perform independent reviews of the Information Technology Services on behalf of AES. They will produce an annual independent audit report that will then be reviewed and assessed by AES management on an annual basis, who will then determine if risks are appropriately mitigated. The Facility owner and operator will be responsible for tracking, funding, and implementing Facility Site upgrades to meet updated standards, as necessary.

7. Security Risk Assessment

Construction and operation of the Facility will be typical of solar facilities of this size and type and do not include additional security risk. The AES Safety Team has identified the following potential areas of risks associated with the construction and operation of the Facility:

- Health and Safety of the employees and subcontractors while working on the Facility Site;
- Material and equipment delivery, storage, and installation;
- Owned, rented, or leased equipment used on the Facility Site; and
- Tools, office facilities, and other miscellaneous items used on the Facility Site.

8. Security Risk Mitigation Measures

To mitigate for the potential security risks outlined above, each employee, subcontractor employee, andother personnel will be required to meet the following criteria prior to being allowed unescorted access to the Facility Site:

- Complete AES Environmental Health and Safety Onboarding; and
- Comply with AES Covid-19 requirements.

Persons, visitors, or others not completing these measures must be escorted by a designated trained employee.

Additionally, the following criteria will apply to all owned, rented or lease equipment to be used on the Facility Site during construction or operation of the Facility:

- All equipment utilized on the Facility Site will be by qualified operators specific to the equipment being used;
- AES company fleet policy will be strictly adhered to regarding all equipment on the Facility Site;
- All equipment will be maintained in working condition and not utilized if any hazards areidentified; and
- No storage of personal vehicles or personal equipment will be allowed on the Facility Site during

nights or weekends.

Tools, office facilities, and other miscellaneous items to be used on the Facility Site will be utilized and maintained per AES company policy.