Attachment AD

Revised Exhibit 18.
Socioeconomic Effects

RIVERSIDE SOLAR, LLC

Matter No. 21-00752

900-2.19 Exhibit 18

Socioeconomic Effects

Contents

Acronym List

ACS	American Community Survey
AES	The AES Corporation, Inc.
BLS	Bureau of Labor Statistics
CSD	Central School District
EMS	emergency medical services
EPC	engineering, procurement, and construction
FTE	full-time equivalent
GHG	greenhouse gas
GSU	Generator Step-up
HCA	Host Community Agreement
NYCRR	New York Codes, Rules and Regulations
NYISO	New York Independent System Operator
NYSDEC	New York Department of Environmental Conservation
ORES	Office of Renewable Energy Siting
PILOT	Payments in Lieu of Taxes
PIP	Public Involvement Plan
POI	point of interconnection
SRP	Safety Response Plan

Glossary Terms

Applicant	Riverside Solar, LLC, a subsidiary of The AES Corporation, Inc. (AES), the entity seeking a siting permit for the Facility from the Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law.
Facility	The proposed components to be constructed for the collection and distribution of energy for the Riverside Solar Project, which includes solar arrays, inverters, electric collection lines, and the collection substation.
Facility Site	The parcels encompassing Facility components which totals 1,168 acres in the Towns of Lyme and Brownville, Jefferson County, New York (Figure 2-1).
Towns	The Towns of Lyme and Brownville, Jefferson County, New York.

Exhibit 18: Socioeconomic Effects

This Exhibit will track the requirements of 19 New York Codes, Rules and Regulations (NYCRR) §900-2.19. The Facility is located in the Towns of Lyme and Brownville, Jefferson County, New York (Towns). The current demographic profiles of the communities are presented in Table 18-1 below:

Table 18-1. Demographics[1]

Population	Town of Lyme	Town of Brownville	Jefferson County	New York
2010 Population[2]	2,185	6,263	116,229	19,378,102
2019 Population	2,273	5,972	109,834	19,453,561
2019 Population per square mile	40.7	101.0	86.6	412.8
Median Age	45.9%	42.0	32.5	38.5
Veterans	11.5%	11.9%	13.6%	4.3%
Foreign born population	2.7%	0.7%	4.0%	22.4%
High school graduate or higher	91.1%	93.6%	91.0%	87.6%
Race and Ethnicity				
White	93.9%	98.4%	87.5%	69.6%
Black or African American	1.2%	0.8%	6.8%	17.6%
American Indian/Alaska Native	0.6%	0.0%	0.7%	1.0%
Asian	0.4%	0.0%	1.7%	9.0%
Native Hawaiian/Other Pacific Islander	0.0%	0.0%	0.3%	0.1%
Two or more races	3.9%	0.8%	3.0%	2.7%
Hispanic or Latino (any race)	3.2%	96.3%	7.8%	19.3%
Total housing units	2,420	N/A	6,170	8,404,381
Owner-occupied units, rate	82.6%	78.5%	56.5%	53.9%
Median value of owner-occupied units	$174,000	$159,000	$149,900	$313,700
Median household income (2019$)	$54,118	$62,109	$52,685	$68,486
Individuals below poverty level	13.1%	11.6%	14.6%	13.0%
Labor Force, March 2021, Bureau of Labor Statistics (BLS)	NA	NA	42,713	9,436,191
Unemployment Rate, March 2021 BLS	NA	NA	7.1%	8.4%

N/A indicates data are not available.
[1]Unless otherwise noted, data are from the US Census Bureau's 2015-2019 American Community Survey (ACS) 5-year estimates program.
[2]US Census 2010 decennial census.
[3]US Bureau of Labor Statistics, 2021. Note that statistics are not available for the Towns of Lyme and Brownville, Jefferson County, New York (Towns).

18(a) Onsite Construction Work Force Impacts

The Applicant developed construction job estimates based on experience with similar projects and the specific requirements of the Riverside Solar Project (Facility). The average and peak labor forecast were determined by evaluating the expected job counts and construction duration. Jobs are expressed in terms of year-long, full-time equivalent (FTE) positions (2,080-hour units of labor).

The Applicant estimates a total of 162.5 FTE jobs will be generated during construction of the Facility. The construction trades that will benefit the most from the construction of the Facility by the creation of FTE jobs will be laborers (62.5 FTE jobs) and electricians (43.8 FTE jobs). Table 18-2 summarizes the Applicant's forecast of the employment by job type and quarter associated with the construction of the Facility.

Table 18-2. Applicant's Forecasted FTE Jobs during Facility Construction

Type of Job	4th Quarter, 2022	1st Quarter, 2023	2nd Quarter, 2023	3rd Quarter, 2023	4th Quarter, 2023	Peak Employment	FTE Jobs[2]
Laborers	10	25	50	50	10	50	62.5
Electricians	0	17	35	35	10	35	43.8
Equipment Operator	5	20	20	20	2	20	25.0
Construction Managers	1	2	4	4	2	4	5.0
Foreman	2	10	21	21	4	21	26.3
Total FTE Jobs	18	74	130	130	28	130	162.5

Note: Numbers shown may not sum to totals because of rounding.
[1]Peak employment is anticipated to occur during the 2nd and 3rd Quarters of 2023.
[2]Jobs are expressed in terms of year-long, full-time equivalent (FTE) positions (2,080-hour units of labor).

Employment is forecasted to peak during the second and third quarter of 2023. Peak employment will generate an average of 130 workers on the job. It is expected 126 of these jobs will be in the construction discipline and 4 jobs will be onsite managers.

18(b) Construction Payroll and Expenditures

The Applicant has developed construction cost estimates for labor, equipment, and materials based on experience with past projects. The reliability of these estimates, however, will be impacted by the recent uncertainty in the engineering, procurement, and construction (EPC) market. To the extent that these market disruptions are short-term in nature, the estimates are expected to accurately reflect future costs. Should the market disruptions persist, however, actual costs may deviate more significantly from the projected costs presented here.

The Applicant has provided estimates of the construction payroll by trade for the anticipated 16-month construction period. Payroll and wage rates reflect the Applicant's experience on similar projects, historical prevailing wages in New York, and the annual inflation levels of recent years. As shown in Table 18-3, the Facility's construction payroll is forecast to average $18.2 million annually, totaling $24.2 million for the 16-month construction period.

Table 18-3. Applicant's Forecasted Labor Force during Facility Construction

Type of Job	Annualized (12 month) Payroll	Estimated Total Payroll
Laborers	$5,210,829	$6,947,772
Electricians	$5,260,433	$7,013,910
Equipment Operator	$3,137,223	$4,182,964
Construction Managers	$3,542,390	$4,723,187
Foreman	$1,030,123	$1,373,497
Total	***$18,180,997***	***$24,241,330***

Note: Numbers shown may not sum to totals because of rounding.
Excludes labor related to interconnecting line. This work will be performed by a specialized contractor for whom specific labor data are not available.

The Facility is located in the North Country Economic Region of New York, which includes Jefferson, Clinton, Essex, Franklin, Hamilton, Lewis, and St. Lawrence counties. The region is home to approximately 416,000 people and has a labor force of approximately than 170,000.[1] The large labor force in the area provides an expanded opportunity for the hiring of local labor.

The *2018 National Solar Jobs Census* (The Solar Foundation, 2018) found that 65.5 percent of field crew were hired within a regional or metropolitan area, with 12.9 percent hired outside the

[1] US Census Bureau 2021 and Bureau of Labor Statistics (BLS) 2021.

region, but within the state. The report also highlights two EPC firms. The one firm reported using 60 percent regional labor on average, while the other reported using 90 percent regional labor.

The exact mix of local and non-local workers cannot be estimated because the qualifications and availability of prospective workers in the region are unknown at this time; however, the Applicant anticipates a significant number of local hires could be made from Jefferson County and the surrounding counties. Based on the available labor force of the North Country Economic Region and the findings of the *2018 National Solar Jobs Census*, it is estimated that between 60 percent and 90 percent of the construction workers would be from the local seven-county region. During the peak construction period, therefore, it is estimated that between 78 and 117 local workers would be employed in the construction of the Facility. Additional construction workers are expected to be hired from within New York State.

While industry experience indicates that between 78 and 117 workers will be hired from Jefferson County and the other counties in the North Country Economic Region, it is impossible to predict in which towns those workers will reside. The Applicant intends to hire locally to the extent that qualified workers are available. A review of the most recent American Community Survey (ACS) data (vintage 2019) indicates that the Town of Brownville has an estimated 115 construction workers, with the Town of Lyme having 24 construction workers.[2] Qualified workers hired by the Applicant may include some of these workers who reside in Brownville or Lyme; however, they also may reside in any one of Jefferson County's other 20 towns or in neighboring counties.

Local workers outside of the construction industry are also anticipated to benefit from the Facilities development as materials are purchased and equipment is rented from businesses in Lewis County and the surrounding region. The landscaping plan, for example, will require the purchase of materials locally and the employment of laborers for installation. Local restaurants, gas stations, and retail locations are anticipated to receive additional business activity which may necessitate an increase in worker hours.

[2] US Census Bureau, 2021

Table 18-4 below portrays the anticipated total non-payroll expenditures during construction of the Facility. As described above, the costs presented are based on the Applicant's experience with previous projects and the current Facility design. Actual costs will vary based on the duration and extent of economic disruptions in the EPC market.

BEGIN CONFIDENTIAL INFORMATION <

Table 18-4. Estimated Non-Payroll Expenditures during Development and Construction of the Facility

	Cost (2021$)
Equipment and Materials (EPC Costs), excluding site preparation	$ [redacted]
Site Preparation	$ [redacted]
Generator Step-up (GSU) Substation	$ [redacted]
Interconnecting (Gen-Tie) Lines	$ [redacted]
Modules	$ [redacted]
Total Non-Payroll Costs	$ [redacted]

> END CONFIDENTIAL INFORMATION

As detailed above, Applicant-provided non-payroll cost estimates are roughly **BEGIN CONFIDENTIAL INFORMATION <**$[redacted] million**>END CONFIDENTIAL INFORMATION**. The costs include mounting, modules, inverters, and electrical components. The Applicant anticipates that a portion of the electrical components will be purchased from New York suppliers, with preference given to suppliers within the North Country Economic Region.

Site preparation, which is anticipated to be primarily a local-to-the-region expense, is anticipated to be **BEGIN CONFIDENTIAL INFORMATION <**$[redacted] million**>END CONFIDENTIAL INFORMATION**. Landscaping expenditures are included in the site preparation cost estimate and are anticipated to be made from within Jefferson County to the extent materials are available. An initial review of landscaping and site preparation businesses has identified potential opportunities for the Applicant to use suppliers in the Towns. It is premature though to select specific vendors in advance of the Facility's permitting and commencement of construction. However, based on the presence of potential suppliers within the Host Communities, the Applicant estimates that up to **BEGIN CONFIDENTIAL INFORMATION** <[redacted] million> **END CONFIDENTIAL INFORMATION** for site preparation and landscaping may be

spent in the Towns during the Project's construction. Some or all of these expenditures, however, may be made in neighboring towns or elsewhere in the region if the businesses in the Towns lack appropriate resources, availability, or are otherwise ill-suited to the requirements of the Project.

To the extent available, the Applicant will also use local suppliers for equipment rentals. Although equipment rental companies have not been identified in the Host Communities, nearby Watertown does have such suppliers. These Watertown-based businesses, as well as others in the local area, may be owned by or employ residents of the Towns and, thus, benefit residents in the Host Communities.

Although the costs above do not represent payroll costs, labor costs are a portion site preparation and Gen-Tie lines costs. Work associated with the Gen-Tie lines will be completed by a specialized contractor whose labor share is not specified.

18(c) Operation and Maintenance Employment Impacts

Based on experience with similar projects, the Applicant has evaluated the expected number jobs and the onsite payroll, by discipline, that will be required during a typical year once the Facility is in operation. The jobs shown here are expected to be performed by New York workers. Table 18-5 summarizes the Applicant's annual employment forecast associated with the O&M of the Facility.

Table 18-5. Applicant's Forecasted Annual Labor Force during Facility Operation and Maintenance

Type of Job	Number of FTE Jobs Created	Payroll
Solar Technician	3	$250,000
Landscape Technician	0.5	$37,000
Total	***3.5***	***$287,000***

The employment during the O&M phase is estimated to be 3.5 FTE jobs. Payroll associated with these jobs is expected to be $287,000 annually. It is anticipated that the Applicant's O&M labor force will live in the vicinity of the Facility. The most recent ACS data show 27 utility works

residing in the Town of Brownville and none living in the Town of Lyme.[3] While the Applicant intend to hire qualified local workers to the extent available, it is impossible to predict where future workers may currently reside, whether they will be moving to the area, and where they will choose to live if relocating. However, up to 3.5 workers total, with a total payroll of $287,000, could live in the Town of Brownville or the Town of Lyme.

Applicant provided materials and equipment costs were also developed specifically for the Riverside Solar Project. Table 18-6 below presents the total direct expenditures during operation of the Facility. The Applicant intends to support businesses in the Towns to the extent practicable. An initial review of landscaping and automotive repair businesses has identified potential opportunities for the Applicant to use suppliers in the Towns. It is premature though to select specific vendors in advance of the Facility's permitting and commencement of construction. However, based on the presence of potential suppliers within the Host Communities, the Applicant estimates that up to $380,000 in land and vehicle maintenance may be spent annually in the Towns. Some or all of these expenditures, however, may be made in neighboring towns or elsewhere in the region if the businesses in the Towns lack appropriate resources, availability, or are otherwise ill-suited to the requirements of the Project.

Table 18-6. Annual Direct Expenditures, Facility Operation and Maintenance.

Expense Type	Cost (2021$)
Labor: Technicians	$287,000
Land Maintenance	$350,000
Vehicle Maintenance	$ 30,000
Total	**$667,000**

Notes: Numbers shown may not sum to totals because of rounding.
Labor costs are anticipated to increase annually as a result of inflation.

As shown above, annual O&M costs are estimated to total $667,000, with $287,000 in labor costs. O&M expenditures are anticipated to be primarily made in the region. Over a time period of 30 years, 105 FTE local jobs will be generated by the Facility. Payroll for the FTE jobs will total an estimated $8.6 million, in 2021 dollars. Income from Facility jobs and from those

[3] Census Bureau, 2021

companies supported by O&M spending will percolate through the regional economy and in turn support other local businesses.

Additional contributions associated with the Facility are lease and purchase payments to landowners which, for this Facility, total approximately **BEGIN CONFIDENTIAL INFORMATION <**$[redacted] million>**END CONFIDENTIAL INFORMATION** over the expected life of the Facility. Lease payments provide owners of agricultural lands a steady stream of income that can provide needed security against fluctuating commodity prices and support continued farming in the vicinity of the Facility Site.

18(d) School District Impacts During the Construction and Operation Phases

The Facility is located within the Lyme Central School District. The largest jobs related impact would be during the construction period. It is not anticipated that families will relocate for short-term constructions jobs. Further, it is anticipated that some portion of the workers during the Facility's construction and O&M phases will be hired from within the North Country Economic Region so relocation would not be necessary. During the operation of the Facility, 3.5 employees are anticipated to be hired. While the local school districts could enroll a few new students as a result of O&M workers relocating, the impacts are anticipated to be minimal. Negative impacts to the school district, therefore, are not anticipated during the construction and operation of the Facility. As detailed in the Public Information Plan (PIP) meeting log (Appendix 2-5), the Applicant reached out to the Lyme Central School District, the Thousand Islands Central School District, and the General Brown Central School District. School district representatives were also invited to the Facility's pre-application meeting held February 26, 2021, as described in Exhibit 2(b)(1).

The operation of the Facility is expected to produce 3.5 FTE jobs. Payments in Lieu of Taxes (PILOT) payments are anticipated to be paid to the Lyme Central School District during the O&M phase of the Facility.

18(e) Municipal, Public Authority, and Utility Services Impacts during the Construction and Operation Phases

As previously described, construction and operation population impacts of the Facility are expected to be negligible. Furthermore, the cost of any services required by the 3.5 onsite

employees would be offset by property taxes (or PILOT payments) and the applicable service fees.

It is not anticipated that Facility construction and operation will place any burdens on community services but will likely generate PILOT revenue and/or payments from the Host Community Agreement (HCA) for the taxing jurisdictions. As detailed in the PIP meeting log (Appendix 2-5), the Applicant has had numerous consultations with staff from the Towns and Jefferson County. The Applicant has also consulted with a variety of local entities, including local emergency medical services (EMS) and fire departments, as outlined in the PIP meeting log. Local agencies, including utility providers, were also invited to the Facility's pre-application meeting held February 26, 2021, as described in Exhibit 2 (b) (1). None of these entities have identified incremental costs that would be incurred as a result of the Facility's construction or operation. No interconnections will be made with water and sewer utilities. Solid waste disposal will be managed by the Facility. Emergency services are not anticipated to experience additional burdens as a result of the Facility.

As described in Exhibit 16(c)(1), the Applicant anticipates entering into Road Use Agreements (RUAs) with the Towns and County concerning repairs to any roads damaged by construction of the Facility. These agreements will include any weight restrictions or truck restrictions on curtained roadways. Thus, no net burden will be placed on the Towns or County in terms of highway/roadway maintenance.

18(f) Designated Tax Jurisdiction, Tax and Payment Impacts

The Facility footprint is within four taxing jurisdictions that are expected to receive PILOT revenues or payments as part of an HCA. The jurisdictions are:

- Jefferson County,
- Town of Lyme,
- Town of Brownville, and
- Lyme Central School District (CSD).

The above taxing jurisdictions will benefit from a PILOT agreement or an HCA as described in the following section, and from additional economic activity in the vicinity of the Facility. New York State is also anticipated to benefit from additional tax revenue generated by the Facility's

construction and O&M. The Facility will pay property taxes to the Towns, County, and CSD for the remainder of its useful life after the 20-year PILOT and HCA period.

18(g) Host Community Benefits

It is expected that execution of PILOT agreements with Jefferson County and the Lyme CSD will require annual PILOT payments for 20 years. An HCA is expected to be executed with each of the Towns. Although the specific terms of the PILOT agreement and HCAs have not yet been negotiated, it is expected these agreements will increase the revenues of the taxing jurisdictions and will represent a significant portion of their total tax levy. For the purposes of this Exhibit, combined annual PILOT and HCA payments are estimated to be $550,000[4] beginning in 2023. Total PILOT and HCA payments over the 20-year agreement period are estimated to exceed $12.7 million.[5] Table 18-7 below details the estimated PILOT and HCA payments to each taxing jurisdiction.

Table 18-7. Anticipated Annual and Cumulative PILOT and HCA Payments for Solar Energy Center

Taxing Jurisdiction	2023 Annual Payment	Cumulative (20-year) Payment
Town of Brownville	$ 34,386	$ 795,124
Town of Lyme	$ 46,052	$ 1,064,898
Lyme Central School District	$270,920	$ 6,264,659
Jefferson County	$198,621	$ 4,592,840
Total	**$550,000[1]**	**$12,718,017**

[1]$5,500 per MW.
Notes: Payments related to the solar energy center are anticipated to increase over time by 1.5% per year. Numbers shown may not sum to totals because of rounding.

The Lyme Central School District is anticipated to receive the largest payments, with a 20-year total of $6.3 million. The Town of Brownville is expected to receive approximately $800,000 over the 20-year period, with the Town of Lyme receiving a total of almost $1.1 million over 20 years. Payments to Jefferson County are anticipated to total $4.6 million over the 20-year period. As

[4] $5,500 per MW.
[5] The payment total includes an anticipated 1.5% increase annually.

mentioned previously, after the PILOT agreements and HCA expire, the Facility will pay property taxes to the jurisdictions for the remainder of its useful life.

The Facility will provide the residents of the Towns electric utility bill credits for the first 10 years of its operation. The credits will total $50,000 annually, based on $500 per MW of capacity. Over the 10-year period, a total of $500,000 in credits will be given.

As a result of the Facility's approximately **BEGIN CONFIDENTIAL INFORMATION <**$[redacted] million>**END CONFIDENTIAL INFORMATION** capital investment, more than 162 FTE direct jobs will be created during the construction phase. It is anticipated that some of these jobs will be filled by residents of the Towns; although, the hiring of workers will be dependent upon the availability of qualified labor at the time of construction. The Facility's spending during construction is expected to result in increased spending in the Towns and in neighboring areas in which residents of the Towns may work or own businesses. Facility spending will generate additional jobs and income through business-to-business (indirect) spending. Induced impacts to jobs and income will be generated from spending by workers whose jobs result from direct or indirect impacts of the Facility. Town residents working or owning businesses in the region are also anticipated to benefit from such indirect and induced spending.

During operation and maintenance of the Facility, 3.5 full-time equivalent jobs will be supported annually. The Facility will instruct contractors to hire qualified labor from the surrounding areas to the extent available. These workers may currently live in the Towns or may choose to relocate to be closer to the Facility. Additional positive indirect and induced impacts to jobs and income will occur as a result of ongoing spending by the Facility, the jurisdictions receiving tax revenues,[6] and the residents who have increased discretionary income as a result of electricity credits. Such spending will benefit the Towns' business owners and workers.

AES intends to develop, own, and operate Riverside Solar for the life of the Facility. The Facility is committed to being a good neighbor by engaging schools and the community through sponsorships, partnerships, presentations, and site tours. By following the PIP, AES will keep the host communities informed of Facility activities. AES strives to support community initiatives, particularly those related to economic development, the environment, and energy efficiency.

[6] If the jurisdictions lower taxes as a result of the revenues received from the Facility's tax or HCA payments, discretionary spending by residents and businesses would be expected to increase.

The Applicant is also working with the local snowmobile club to ensure that that the one snowmobile trail that runs along the Facility Site will be able to connect through and continue on past the Facility.

18(h)Comparison of Fiscal Costs to Jurisdictions

As previously discussed, fiscal costs related to the services provided by the taxing jurisdictions are not anticipated. Construction phase employment will be temporary and is not expected to result in the relocation of families. Operations and maintenance job-related impacts are relatively small. With the expected payments associated with the PILOT agreement and the HCA, the Facility should result in positive fiscal impacts for the jurisdictions. After the 20-year PILOT and HCA period, the Facility will pay property taxes to the jurisdictions for the remainder of its useful life.

18(i) Analysis of Local Emergency Response

Exhibit 6(c) outlines safety and security for the Facility. The Safety Response Plan (SRP) in Appendix 6-1 provides detailed information regarding the emergency response procedures for possible contingencies. The SRP includes information on local fire departments and police/sheriff departments/offices. In the event of an emergency, the Site Leader will assess the situation and perform the proper actions and procedures as outlined in the SRP. These actions may include evacuation and contacting emergency services.

The Facility SRP will be shared with the appropriate emergency response teams. The emergency response teams will be given an opportunity to review these plans, ask questions and provide suggestions. Coordination with fire, police and other emergency services is important and the Applicant will work to ensure that they are kept updated on the status of the Facility and are made aware of potential safety and security emergencies. Preliminary introductions and discussions have been conducted with Chaumont Volunteer Fire Department, Three Mile Bay Fire Department, Jefferson County EMS, and local town and county officials as described in the PIP meeting log (Appendix 2-5). Consultations with first responders include the following:

- Meeting with the Chief of the Chaumont Volunteer Fire Department on February 14, 2020.
- Meeting with member of the Director’s staff of Jefferson County EMS on February 19, 2020

- Left a voicemail introducing the Project and mailed information to the Chief of the Three Mile Bay Fire Department.

First responders and fire departments were also invited to the February 26, 2021 pre-application meeting, as described in Exhibit 2(b)(1). Additional discussions will occur prior to construction and prior to the start of operations.

The Applicant will work with emergency responders to coordinate any training that may be necessary. Based on the consultations to date, the fire departments and other first responders have not identified any additional equipment, training, or capacity that would be needed to respond to emergencies at the Facility either during the construction or operation of the Facility. Therefore, no infrastructure costs related to the Safety Response Plan would be borne by the Towns.

18(j) Consistency with State Smart Growth Public Infrastructure Criteria

As the Facility is privately-funded energy project it is not subject to New York Environmental Conservation Law Article 6, Section 107 (ECL § 6-107) requiring the construction of new or expanded "public infrastructure" to meet certain Smart Growth Criteria. New York State's Smart Growth Public Infrastructure Policy Act outlines 10 criteria for evaluating public infrastructure. An additional criterion was added at a later date. The Facility's consistency, although not required, with Smart Growth Criteria is addressed below for illustrative purposes. Under the statute, state infrastructure agencies shall not approve, undertake, or finance a public infrastructure project, unless the project, to the extent practicable, meets the relevant criteria set forth in the document (ECL § 6-107).

Criterion 1: To advance projects for the use, maintenance or improvement of existing infrastructure

The Facility will improve the State's existing energy infrastructure by creating an economically viable, solar-powered electrical-generating facility that provides renewable energy to the New York State power grid and will generate up to 100 MW of renewable energy that will be provided to the New York State electric system that is managed by the New York Independent System

Operator (NYISO).[7] The Facility will use the existing electric system for the distribution of electricity to end users. The conveyance of equipment and construction materials will use existing transportation infrastructure. Long-term impacts to the transportation infrastructure are not anticipated.

Based on the contribution to the state electric system and the limited use of transportation infrastructure, the Facility is consistent with Smart Growth Criteria 1.

Criterion 2: To advance projects located in municipal centers

New York State's Smart Growth Public Infrastructure Policy Act defines "municipal centers" as:

> areas of concentrated and mixed land uses that serve as centers for various activities, including, but not limited to, central business districts, main streets, downtown areas, brownfield opportunity areas, downtown areas of local waterfront revitalization program areas, transit-oriented development, environmental justice areas, and hardship areas (ECL § 6-107),

as well as:

> areas adjacent to municipal centers, which have clearly defined borders, are designated for concentrated development in the future in a municipal or regional comprehensive plan, and exhibit strong land use, transportation, infrastructure and economic connections to a municipal center; and areas designated in a municipal or comprehensive plan, and appropriately zoned in a municipal zoning ordinance, as a future municipal center (ECL § 6-107).

Large land areas are required for the development of solar power projects. Therefore, solar projects, such as this, are incompatible with municipal centers. Therefore, compliance with this criterion is impracticable. Additionally, siting a solar project requires willing landowners and access to a point of interconnection (POI) in order to provide the electricity generated to the electric system that is managed by the NYISO.

[7] NYISO manages New York's electric grid and its competitive wholesale electric marketplace.

Criterion 3: To advance projects in developed areas or areas designated for concentrated infill development in a municipally approved comprehensive land use plan, local waterfront revitalization plan and/or brownfield opportunity area plan

Solar projects are incompatible with infill development and waterfront revitalization due to large land area requirements. The Facility is not located in a designated brownfield area. Therefore, compliance with this criterion is impracticable. Also, siting a scale solar project requires access to a point of interconnection and willing landowners in order to provide the electricity generated to the electric system that is managed by the NYISO.

Criterion 4: To protect, preserve and enhance the state's resources, including agricultural land, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archeological resources

The Facility is consistent with Criterion 4. The potential effects on agricultural land, forests, surface and groundwater, recreation and open space, scenic areas, and significant historic and archaeological resources are analyzed in Exhibits 3, 13, 8, and 9 and related studies. These analyses illustrate that the Facility has avoided and/or minimized impacts to the relevant resources to the maximum extent practicable. Any remaining impacts are outweighed by the benefit of enhanced state air quality provided by the Facility's generation of up to 100 MW of renewable energy.

Criterion 5: To foster mixed land uses and compact development, downtown revitalization, brownfield redevelopment, the enhancement of beauty in public spaces, the diversity and affordability of housing in proximity to places of employment, recreation and commercial development and the integration of all income and age groups

The proposed Facility is in the rural communities of Lyme and Brownville. The area is not currently proposed for mixed land uses, compact development, or the development of diverse and affordable housing in the proximity to places of employment, recreation, and commercial development. Also, significant open space requirement is incompatible with downtown revitalization. The location is also not in a brownfield. Compliance with these criteria, therefore, is impracticable. Additionally, siting a solar project requires access to a point of interconnection

and willing landowners in order to provide the electricity generated to the electric system that is managed by the NYISO.

Criterion 6: To provide mobility through transportation choices including improved public transportation and reduced automobile dependency

The Facility will not be designed to impact transportation choices in the area. Therefore, compliance with this criterion is impracticable.

Criterion 7: To coordinate between state and local government and intermunicipal and regional planning

The Applicant has been involved in public outreach to relevant governmental and planning agencies throughout the development and review of the Facility, in accordance with the requirements of the 94(c) process and the PIP plan prepared specifically for the Facility. The stakeholder list and information on the public coordination efforts are included in Exhibit 2 and its appendices.

Criterion 8: To participate in community-based planning and collaboration

The applicant has conducted stakeholder outreach throughout the development and review of the proposed Facility. These efforts include stakeholder consultation and other forms of engagement, public education, public meetings, ample notification periods, and public comment periods at key milestones (see Exhibit 2 and the PIP for more information). Further information is also available to the community via the website https://www.aes.com/riverside-solar-project. These outreach efforts satisfy the criterion related to participation in community-based planning and collaboration.

Criterion 9: To ensure predictability in building and land use codes

The Applicant's Facility will not impact building and land use codes in Jefferson County or in the Towns.

Criterion 10: To promote sustainability by strengthening existing and creating new communities which reduce greenhouse gas emissions and do not compromise the needs of future generations, by among other means encouraging broad based public involvement in developing and implementing a community plan and ensuring the governance structure is adequate to sustain its implementation

A renewable energy source, such as solar power, generates electricity without the by-product of greenhouse emissions and can reduce the dependence on conventional power plants, thereby reducing the emissions of conventional air pollutants. The Facility is expected to reduce carbon dioxide emissions by 133,000 metric tons annually, which is the equivalent of taking approximately 28,000 cars off the road.

State goals of having 70 percent of energy generation produced from renewable energy sources by 2030, a 40 percent reduction in greenhouse gas emissions from the 1990 level by 2030, and carbon-free generation of electricity by 2040 (CL&CPA of 2019) will be assisted by the Facility. As this Facility will expand the state's clean, renewable energy infrastructure and reduce greenhouse gas emissions, the Facility is consistent with and will help the state achieve its goals in Criterion 10.

Criterion 11 (effective March 21, 2015): To mitigate future physical climate risk due to sea level rise, and/or storm surges and/or flooding, based on available data predicting the likelihood of future extreme weather events, including hazard risk analysis data if applicable

The Facility is consistent with New York's efforts to expand reliance on renewable energy sources and reduce greenhouse gas (GHG) emission. *Climate Smart Communities Guide to Local Action: Taking Steps to Combat Climate Change*, notes reducing greenhouse gas emissions "will help stabilize atmospheric GHG at manageable levels and avoid severe climatic changes." The State recognizes that this action will "minimize the risks of climate change and reduce its long-term costs" (New York Department of Environmental Conservation (NYSDEC 2017). A zero-emission, renewable energy source, such as solar power, not only expands available power generation capabilities without increasing greenhouse gas emissions, the addition of a solar power project will result in a decrease in existing GHG emission levels, as solar power displaces generation from fossil fuel facilities. As such, the Facility is expected to have a positive impact on the mitigation of future physical climate risk, thereby supporting Smart Growth Criterion 11.

18(k) Host Community Benefits Provided by the Applicant

The Facility will generate an estimated $12.7 million in revenue for Jefferson County, the Towns, and the Lyme Central School District over a 20-year period. This revenue will allow taxing jurisdictions to undertake needed community improvements or lower tax rates, as the Facility will not require the jurisdictions to provide additional services or resources.

The Facility will provide the residents of the Towns electric utility bill credits for the first 10 years of its operation. The credits will total $50,000 annually, based on $500 per MW of capacity. Over the 10-year period, a total of $500,000 in credits will be given.

As a result of the Facility's approximately **BEGIN CONFIDENTIAL INFORMATION <**$[redacted] million>**END CONFIDENTIAL INFORMATION** capital investment, more than 162 FTE direct jobs will be created during the construction phase. It is anticipated that some of these jobs will be filled by residents of the Towns; although, the hiring of workers will be dependent upon the availability of qualified labor at the time of construction. The spending during construction is expected to result in increased direct spending in the Towns and in neighboring areas in which

residents of the Towns may work or own businesses. Facility spending will generate additional jobs and income through business-to-business (indirect) spending. Induced impacts to jobs and income will be generated from spending by workers whose jobs result from direct or indirect impacts of the Facility. Town residents who work or own businesses throughout the region are expected to benefit from the direct, indirect, and induced spending generated by the Facility's construction.

During the Facility's operation and maintenance, 3.5 full-time equivalent jobs will be supported annually. The Facility will instruct contractors to hire qualified labor from the surrounding areas to the extent available. Some of these workers may reside in the Towns. Additional positive indirect and induced impacts to jobs and income will occur as a result of ongoing spending by the Facility, the jurisdictions receiving tax revenues,[8] and the residents who have increased discretionary income as a result of electricity credits. Such spending is anticipated to benefit the Towns' business owners and workers.

AES intends to develop, own, and operate Riverside Solar of the life of the Facility. The Facility is committed to being a good neighbor by engaging schools and the community through sponsorships, partnerships, presentations, and site tours. By following the PIP, AES will keep the host communities informed of Facility activities. AES strives to support community initiatives, particularly those related to economic development, the environment, and energy efficiency. The Applicant is also working with the local snowmobile club to ensure that that the one snowmobile trail that runs along the Facility Site will be able to connect through and continue on past the Facility.

Conclusions

In conclusion, the Facility will engage the community through sponsorships, partnerships, presentations, and site tours. Jefferson County, the Towns, and the Lyme CSD are expected to receive PILOT revenues or payments as part of an HCA, likely exceeding $12.7 million over the 20-year agreement period. The Facility will invest approximately **BEGIN CONFIDENTIAL INFORMATION <**$[redacted] million>**END CONFIDENTIAL INFORMATION** in renewable energy, creating 162 FTE direct jobs during construction. During the Facility's operation and

[8] If the jurisdictions lower taxes as a result of the revenues received from the Facility's tax or HCA payments, discretionary spending by residents and businesses would be expected to increase.

maintenance, 3.5 full-time equivalent jobs will be supported annually. The spending during construction will also result in increased spending in the host communities, generating additional jobs and income through business-to-business (indirect) spending. Local workers outside of the construction industry are also anticipated to benefit from the Facility's development as materials are purchased and equipment is rented from businesses in Jefferson County and the surrounding region. The Facility has been designed to comply with 19 NYCRR § 900-2.19 and the uniform standards and conditions and impacts related to socioeconomics have been avoided and minimized to the maximum extent practicable.

References

Bureau of Labor Statistics (2021). Local Area Unemployment Statistics. Retrieved June 24, 2021 from URL https://www.bls.gov/lau/#data.

U.S. Census Bureau. (2021). 2015-2019 American Community Survey 5-Year Estimates. Retrieved May 11, 2021 from URL https://data.census.gov.