Highbanks Solar Project Operations and Maintenance Plan

Project Size:

12.5 MW AC

Project Location:

Intersection of Highbanks and Old Highbanks Road Town of Leicester, NY Latitude, Longitude: 42°44'10.08"N, 77°54'58.04"W

Prepared by:

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Date:

June 2024

Purpose:

Compliance with Town Code Section 714 – Solar Energy Systems, Part C (5), (b), (v)

Introduction

Highbanks Solar, LLC ("Highbanks") is proposing to develop, construct and operate the Highbanks Solar Project ("Project") a 12.5 megawatt alternating-current (12.5 MW AC) solar photovoltaic facility in the Town of Leicester (the "Town") in Livingston County, New York. The Project will interconnect into New York State Electric and Gas Corporation's (NYSEG) Highbanks substation. In seeking a Special Use Permit from the Town, the Project is obligated to provide an Operations and Maintenance ("O&M") Plan.

Prior to construction a list of stakeholders who will be provided with this O&M Plan will be developed. The current list of O&M stakeholders are:

- Town of Leicester Building & Zoning Department; attention to Code Enforcement Officer
 132 Main St, Leicester, NY 14481
- Town of Leicester Highway Department; attention to Highway Superintendent 132 Main Street P.O. Box 197; Leicester NY 14481

All reports generated from inspection and maintenance procedures will be provided to the O&M Stakeholders listed above. Any notices made through this O&M Plan will go to the appropriate stakeholder.

Operations and Maintenance Program

The Project has not selected an O&M contractor and won't do so until just prior to construction. The Project will notify the Town of its O&M contractor selection and provide contact information for the O&M contractor. Examples of O&M companies experienced with maintaining solar projects in New York include Strata Solar Services and QE Solar as examples. The Project's onsite O&M program will consist of the following:

- 1. Site Inspection Biannual
 - a. Security inspect fence lines for damage/vandalism, check conditions for locks/other protection measures, visually inspect electronic surveillance.
 - b. System Foundations visual inspecting of grounds/vegetation, inspect mud/water pooling/soil erosion.
 - c. Identify shading issues
 - d. Access roads visual inspecting the surface with emphasis on identifying any area showing rutting or potholing as well as any subsidence of the bedding under the aggregate. Observing and addressing any evidence of encroachment of vegetation in a manner that reduces the access road width from what is indicated by the approved site plan. If repairs are deemed necessary to restore the road to good condition, such shall be made using only clean aggregate such as crushed stone meeting NYSDOT item 703-02 specifications. Mechanical compaction of the installed aggregate is not permitted. Note that although the pervious access road section is intended to allow free drainage throughout, freezing of the roadway during winter conditions is still likely due to

- snowpack. If plowing becomes necessary, the plow should be equipped with skid shoes or similar to reduce the potential for pushing stone off of the surface of the access road.
- e. Stormwater controls check for failures. Check for areas across the site where soil erosion has occurred. If such conditions are encountered apply topsoil, seed and straw mulch to impacted areas and follow up with an additional inspection in 2-4 weeks to gauge progress of the repair.
- f. Culverts check for sediment buildup and check for scouring around the inlet of the culvert. Provide rip-rap armoring protection if necessary.

2. System Inspection - Annual

- a. PV array conditions cleanliness, damage, ventilation
 - i. Solar panel cleaning is not expected to be needed given typical rainfall at the Project site. If necessary, solar panel cleaning will be conducted with water only, no detergents will be used. Water will be trucked in to fill the equipment used to clean solar panels.
- b. Inspect conduit runs for damage.
- c. Inspect electrical equipment enclosure for damage
- d. Inverter preventive maintenance
- e. Inspection for loose electrical connections, medium voltage transformers.
- f. Inspect all switches/fuses/disconnects

3. Vegetation Management – Tri-annual

- a. Mowing as needed but no less than three (3) times annually (approximately May, July and September) to ensure grass is no taller than 18 inches. No chemicals or herbicides will be used for vegetation management. The vegetation management schedule, mowing height and other specifications will be finalized prior to commercial operations and provided to the Town.
- b. Document any bare spots in need of re-seeding
- 4. Infrared Scanning/Thermal Imaging Annual
 - a. Thermal imaging of combiners/inverters/disconnects.
 - b. Infrared scanning via aerial drones
 - i. Prior to conducting any aerial drone work, the Project will provide the Town notification as well as a flight plan and map.
- 5. Snow removal as needed
 - a. Oriden will identify a local contractor that can provide access road snow removal services on an on-call, as-needed basis.

Routine inspections and maintenance will occur between 8am and 6pm between Monday and Friday during all months except winter. During winter months, routine inspections and maintenance will occur between 9am and 5pm. O&M will also include 24/7 system monitoring and have a dispatch commitment to the Project within 24 hours in case of emergencies. The Project will install on site a sign or installation with information on a 24/7 number to call in case of emergency. Emergency site visits may require coordination with local first responders or utilities, and as time and circumstances permit, the Project will contact these parties.

Inspection and maintenance of vegetative screening

Vegetative screening inspection will be performed at each vegetation management visit. If any vegetative screening appears damaged or dying, photo documentation will be taken, and a follow-up inspection scheduled.

Should any vegetative screening plant(s) be documented as dead during the project lifespan, they shall be replaced with the same or similar vegetative screening as provided in the project's Special Use Permit unless it is determined surrounding vegetative screening has grown such that replacement vegetation is unnecessary.

Site Compliance with SPDES Permit and Erosion and Sediment Controls

As part of the State Pollutant Discharge Elimination System (SPDES) requirements and ongoing commitments, the Project is obligated to maintain sufficient erosion and sediment controls. This process is governed by NYS regulations and will be closed out soon after the necessary ground cover is sufficiently (~80%) in place after construction. However, should the Project require any minor repairs or remediation to the site conditions in some future year, the guidance from the Project's SWPPP is repeated below for reference.

Recommended Upland Seed Mix:

ERNST SOLAR FARM SEED MIX - ERNMX-186 or similar

Seeding Rate: 6 LBS PER 1,000 SQ FT

Additional O&M Plans and Procedures

Prior to construction a fire and emergency procedures plan will be provided to the Town and fire department(s) that would respond to any emergencies at the Project. In addition, prior to commercial operation, training would occur for the fire departments on Project access and emergency response. This training will be conducted annually for the life of the Project.

Emergency shut down to the grid will be governed by NYSEG procedures. If there are weather conditions that require the Project to shut down and the solar panels are tracking technology, they will automatically be stowed parallel to the ground to minimize wind loading.

The Project does not envision any issues with trespassing since the entire Project will be fenced, and the fence will have barbed wire on top of it. In the unlikely event that trespassing within the Project occurs, the Project owner will explore installation of infrared cameras or other video surveillance equipment.