

OPERATIONS AND MAINTENANCE PLAN

I. Introduction

Upon completion of the proposed Project, Petitioner will enter into a third-party Operations and Maintenance contract with an experienced third-party operations and maintenance provider ("O&M Manager"). With a fleet of electricians, production analysts and vegetation management personnel, the O&M Manager works diligently to ensure the Project maintains peak performance, reliability and safety.

Prior to energization of the PV Project, the O&M contractor will perform a quality and safety inspection. This inspection is a detailed and site wide inspection to ensure all mechanical and electrical components are installed per manufacturer specifications and per site design. The O&M Manager will also provide detailed safety and emergency response training for Enfield municipal employees.

Upon energization, the O&M Manager is responsible for the health and safety of the plant. The site will be continuously monitored (24/7/365 monitoring) remotely via a data acquisition system ("DAS"). The DAS has the ability to send alarms identifying communication, power generation or safety related issues. The O&M Manager has a team dedicated to on-call service dispatches to address immediate issues from its data acquisition center. In addition to its dedicated on-call team, the O&M Manager will perform detailed annual inspections and will perform routine vegetative management on the Site.

II. Scope of Work

A. <u>Daily Monitoring of Plant Operation</u>: For each solar Project, an O&M Manager monitors the Project continuously and receives data from the DAS of any performance or safety related issues. When an alert occurs, it is the responsibility of the O&M Manager to assess the severity of the alert and dispatch the on-call team if necessary. From there, the on-Site service technicians will assess the severity and repair/replace equipment as required. The service details of the O&M Manager are as follows:

- 1. Monitoring Operations:
 - Monitoring, 24 hours a day, 7 days a week, 365 days per year
 - Alarm Notification
 - Remote Corrective Diagnostics
 - Remote Power Plant Operation
- 2. Performance Optimization Services:
 - Performance Trend Analysis
 - Performance Engineering
 - Data Storage
- B. <u>Annual Inspection, Testing & Preventative Maintenance</u>: The O&M Manager is also responsible for performing an annual site wide inspection. This inspection is targeted towards securing the safety, performance and reliability of the solar Project. A full report is outputted from the results of the inspection. This inspection includes the following:
- 1. Aerial Thermal Imaging and Reporting:
 - Full Site aerial inspection of all PV modules. UAV (drone) coupled with thermal imaging camera and Raptor Maps proprietary mapping and diagnosis software will identify module level inefficiencies and failures.
- 2. PV Modules
 - Module Inspection, Front
 - Inspect front of modules for broken glass, delamination, yellowing or browning, burnt or oxidized cells, or cracks in cells. Inspect module frames for cracks or bends. Inspect module conductors for tension and indicators of heat.

3. Mounting System

- Mounting System, Support Structure
 - Visually inspect support posts and structural components for evidence of rust, corrosion, settling, or tilt. Visually inspect mounting system hardware for tightness and evidence of rust or corrosion. Inspect and test rack grounding, check for torque levels, re-torque as necessary. Measure and record earth to ground resistance between rack and ground rod with low-resistance ohmmeter.
- 4. DC Combiner
 - Inspect enclosure and devices for corrosion, heat distortion, moisture entry, insect and rodent infestation, and exterior damage. Confirm that all signage and labeling is in place. Inspect surge protection devices for indication of failure. Perform thermographic survey of all terminations and overcurrent protective devices.

- 5. DC/AC Raceway
 - Inspect all DC raceways for loose connections, missing sealant, corrosion and above-grade moisture intrusion.
- 6. DC/AC Disconnect
 - Inspect enclosure and devices for corrosion, heat distortion, moisture entry, insect and rodent infestation, and exterior damage. Confirm that all signage and labeling is in place. Perform thermographic survey of all terminations and overcurrent protective devices.
- 7. Inverter
 - Inspect enclosure, door seals, latches and door stops for signs of corrosion, heat distortion, moisture entry, insect and rodent infestation, and exterior damage in accordance with manufacturer's recommendations and requirements. Confirm that all signage and labeling is in place. Clean all ventilation plates, air ducts, screens, devices and seals in accordance with manufacturer's recommendations and requirements. Inspect Surge Protection Devices for indication of failure. If any single SPD indicates failure mode, replace all SPD modules. Perform thermographic survey of all terminations and overcurrent protective devices.
- 8. Medium Voltage Transformer
 - Inspect enclosure and devices for corrosion, heat distortion, moisture entry, insect and rodent infestation, and exterior damage. Confirm that all signage and labeling is in place. Inspect anchorage and alignment.
- 9. SCADA/DAS System
 - Inspect devices and enclosures for physical damage. Clean as needed. Check tightness of electrical connections. Inspect weather station and all sensors for proper alignment.
- C. <u>Vegetative Maintenance:</u> Maintenance within the array is typically performed (3) times annually during the growing season. During this time, the site is inspected for evidence of erosion and vegetation health. Vegetative growth exterior to the array is analyzed annually for shade impacts on the array. Any vegetative or site concerns are noted within the annual report. No pesticides or herbicides will be used in the vegetative maintenance of the site. Grass will be cut 2-3 times per year depending on the growing season. Mechanical devices (String Trimmers) are used where mowers cannot reach so that no chemicals will be used.
- D. <u>Module Washing and Snow Removal:</u> Module washing and snow removal is performed on an as needed basis. Due to the tilt of the modules included within the proposed design, soiling effects due to snow build up, pollen or dust is naturally removed from the module surface. In the event the modules require cleaning, clean water with no chemicals or additives will be used.

E. Emergency Response:

Enfield Police Department: 293 Elm Street Enfield, CT 06082 Phone: (860) 763-6400

Enfield Fire Department: 200 Phoenix Ave Enfield, CT 06082 Phone: (860) 745-1818

Utility Contact Information: Eversource CT (800) 286 -2000

Owner Contact information: LSE Scutum LLC and LSE Bootes LLC 40 Tower Lane, Suite 201 Avon, CT 06001 Phone: (410) 274 -2716 Email: jmacel@lodestarenergy.com

O&M Provider Contact Information: Ameresco Phone: (800) 916 -8066 Email: ROC@ameresco.com

If it is determined the site must be shut down, the following emergency shutdown procedure should be conducted in conjunction with representatives of police and fire department:

1) Open AC disconnect located on equipment pad

2) Turn off DC disconnects on all inverters located on equipment pad

3) Turn off all DC disconnects on DC combiners located throughout array

4) Contact the Willimantic Fire Department and Police Department if not already present.

II. Spill Prevention Control Plan

Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill to avoid possible impact to nearby habitats.

A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state and federal laws.

The following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.

- 1. Petroleum and Hazardous Materials Storage and Refueling
 - a. Refueling of vehicles or machinery shall occur within the Construction Laydown Area ONLY and shall take place on an impervious pad with secondary containment designed to contain fuels. This area must be a minimum of 100 feet from wetlands or watercourses and the aquifer protection area on the Site.
 - b. Any fuel or hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands or watercourses.
- 2. Initial Spill Response Procedures
 - a. Stop operations and shut off equipment.
 - b. Remove any sources of spark or flame.
 - c. Contain the source of the spill.
 - d. Determine the approximate volume of the spill.
 - e. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.
 - f. Ensure that fellow workers are notified of the spill.
- 3. Spill Clean Up & Containment
 - a. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.
 - b. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
 - c. Isolate and eliminate the spill source.
 - d. Contact the appropriate local, state and/or federal agencies, as necessary.
 - e. Contact a disposal company to properly dispose of contaminated materials in accordance with all local, state and federal regulations.

4. Reporting

- a. Complete an incident report.
- b. Submit a completed incident report to the Connecticut Department of Environmental Protection, municipal officials, Connecticut Siting Council and other applicable local, state and federal officials, the Owner, and O&M Provider.

Spill Prevention Plan Contractor Contact Information: LSE Scutum LLC and LSE Bootes LLC 40 Tower Lane, Suite 201 Avon, CT 06001 Phone: (410) 274 -2716 Email: jmacel@lodestarenergy.com

V. Incident Report Form

Any accidents or injuries should be reported through an Incident Report Form and sent to the Connecticut Department of Environmental Protection, municipal officials, Connecticut Siting Council and other applicable local, state and federal officials, the Owner, and O&M Provider. A blank copy is attached for reference.

Incident Report Form ACCIDENT INVESTIGATION REPORT

Project: _____

Date of Accident: _____

Accident Description:

ocation of accident:	Time of Day:	Day of Week:
/ehicle No. or Type:	Were police called?	Police Report No.:

WITNESSES: (attach written statements)

Name:	Job Title:	Telephone:
Name:	Job Title:	Telephone:
Name:	Job Title:	Telephone:

INJURY INVESTIGATION REPORT

Department/Division:				Project:			
Injured Er	nployee's N	lame:			Date	of Injury:	
Sex:	Age:	Employme	ent Status:	Full Time	Part Time	Seasonal	Temporary
Regular a	ssigned po				Length of time in position:	this	
Was empl	loyee perfo	rming regular j		lf not, explain			
Was empl	loyee worki	ng overtime?	If yes,	explain:			
Does emp	oloyee work	a rotating shi	ft?	Was there a	recent change in	the shift?	
Explain:							
Location o	of accident:		Time	of Day:	Day	of Week:	
Body part injured:			Туре о	of injury:			
Severity o	of injury:						
First	Aid [Dr. Visit	Emergency C	Care R	estricted Duty	Lost Time	Near Miss
Vehicle N	o. or Type:		Were	police called?	Police	Report No.:	
Describe i	in detail wh	at happened:					
Has this e	employee re	ceived training	g in the preven	ntion of this typ	e of injury?	Date:	
Describe	anv equipm	ent damage/e	stimate cost:		_		

WITNESSES: (attach written statements)		
Name:	Job Title:	Telephone:
Name:	Job Title:	Telephone:
Name:	Job Title:	Telephone:

ROOT CAUSE ANALYSIS

Use this listing as an aid in identifying the factors that contributed to this event

STEP 1 – CONTRIBUTING FACTORS

PROCEDURES	COMMUNICATION
Not Developed	Insufficient Planning for Tasks
Developed – Not Communicated	Lack of Worker Communication
Developed – Not Understood	Lack of Supervisor Instruction
Developed – Not Followed	Work Team Breakdown
Lack of Disciplinary Policy	Confusion After Communication
Other	Other
HAZARD(S)	TRAINING
Unidentified	Deficient Orientation Training
Known But Not Corrected	Deficient Job-Specific Training
Created by External Factors	Insufficient for New Conditions
Documented But Not Repaired	Lack of Follow-Up Reinforcement
Condition Changes Not Conveyed	Lack of Supervisor Training
Repaired Deficiently	Hazards Overlooked in Training
Unforeseen Emergency	Tool(s) Used Incorrectly
Other	Other
PRODUCTION FACTORS:	WORK BEHAVIOR
Heavy Workload	Shortcuts taken
Tight Schedule	Required PPE Not Used
Long/Unusual Working Hours	PPE Not Used Properly
Falsely Perceived Need to Hurry	Tool/Equipment Used Incorrectly
Co-worker Competition	Over-exertion/Fatigue
Lack of Teamwork	Distraction
Changes in Production	Drug/Alcohol Use/Influence
Other	Other
FACILITIES/EQUIPMENT	ENVIRONMENT
Poor/Faulty Equipment Design	Weather, Temperature
Corrosion/Wear	Poor Housekeeping

Equipment Not Guarded Awkward Workspace Design Lack of Preventive Maintenance Other	Poor Lighting Poor Visibility Air Quality Other	
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STEP 2- MAJOR CAUSE

Procedures	Production Factors
Communication	Work Behavior
Hazard	Facilities/Equipment
Training	Environment

STEP 3 – ANALYSIS OF MAJOR CAUSE(S):

List out 5 reasons why major cause(s) happened to get to root cause:

1.		
2.		
3.		
4.		
5.		

Corrective steps for contributing factors:

Corrective steps for major cause: