

Exhibit C – Operations, Maintenance, & Emergency Response Plan



**Operations, Maintenance, &
Emergency Response Plan**
VCP Groton LF

Date:

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Prepared By:

VCP Groton LF, LLC

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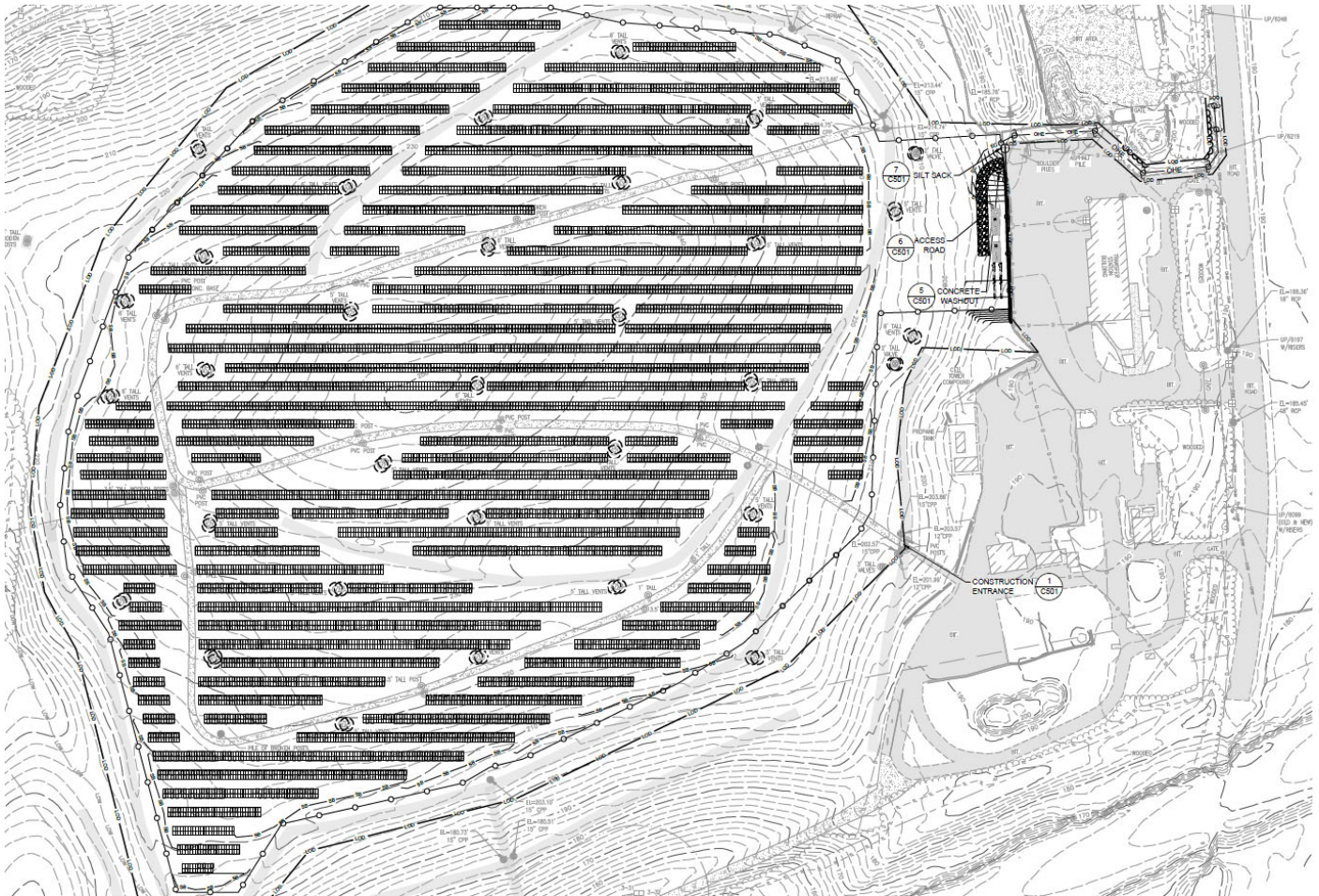
Operations, Maintenance, & Emergency Response Plan

1. Introduction

VCP Groton LF, LLC (“Owner”) is responsible for maintaining and servicing the photovoltaic (PV) electric system as well as the related facilities during the operational phase of the project. Related facilities include fencing, grass, roads, storm water devices, etc. This O&M Plan describes the project components, commissioning procedures, monitoring system, Maintenance provisions and emergency response

2. Project Description

The proposed Project is a 4.975 MW AC ground mounted ballasted solar array located in Groton, CT that will consist of solar modules, inverters, switchgear, transformers, and electrical systems interconnected to the utility grid along Flanders Road. The Project also includes access roads and security fencing.



3. Contact Information

Table 1. Project Contact Information

Owner	VCP Groton LF, LLC 124 LaSalle Road, 2 nd Floor West Hartford, CT 06107 (860)288-7215 development@verogy.com
O&M Service Provider	VCP EPC, LLC 124 LaSalle Road, 2 nd Floor West Hartford, CT 06107 (860)288-7215 sdenino@verogy.com

4. Operations

4.1. Commissioning

Prior to the project reaching operation, the following inspections and tests will be performed by the O&M provider. The results will be included in the projects commissioning report.

- Full visual Inspection
- Mechanical inspection including torque verification of critical connections
- String Testing (IV curve test)
- Full System Production Evaluation
- Thermal Scanning

4.2. Monitoring

The O&M provider will utilize a continuous 24/7 remote monitoring system to provide alarm and performance data of the system. The monitoring system will include full site and inverter level production and alarms as well as site weather and irradiance data. The O&M provider will analyze performance data to make sure that the system is performing as designed and will be responsible for dispatching crews for system maintenance and repair related issues. The O&M provider will be contractually obligated to comply with this O&M Plan, as well as the conditions of all permits or regulatory approvals.



5. Maintenance

Maintenance services are outlined below. (The frequency of these services is outlined in Table 2)

5.1. Site Access

The solar array and all associated equipment shall be located behind a fence with gates as depicted on the construction drawings or as directed by permitting authorities. Access to that facility shall be granted to authorized personnel only. Access to that facility shall be arranged with the Owner or O&M provider as identified in table 1. Provisions will be in place for Emergency personnel to access the site via a universal key box (i.e. Knox Box) that will have that appropriate key(s) to access the facility.

5.2. Equipment Maintenance

The O&M provider and/or its authorized subcontractors will inspect and maintain electrical and PV equipment in accordance with the manufacturer's requirements to maintain proper operation and warranty status.

The O&M provider will also perform the following inspections. The results from these inspections/tests will be provided in an O&M inspection report.

- The operation of all safety devices will be reviewed and corrected to maintain proper function.
- Full visual Inspection of all equipment, subassemblies, wiring, connectors, etc.
- Thermal Scanning of electronic equipment, wiring terminations, connectors, etc.
- Mechanical inspection including torque verification of critical connections
- String Testing (IV curve test)
- Air filter elements

5.3. Site Maintenance

The O&M provider and/or its authorized subcontractors will visit the site monthly to assess site conditions and perform maintenance as needed. Signage and egress functionality will be inspected at this time and repaired, if necessary.

5.3.1. Grass Management

Grass around and under the array will be mowed in accordance with the schedule in Table 2 and will be maintained to a height to reduce the risk of fire. Grass will be re-planted in bare areas to ensure that erosion control is maintained.



5.3.2. Panel Cleaning

Panel Cleaning is rarely necessary in the Northeast, but if the panels are to experience enough soiling to adversely affect production the panels will be cleaned using water and soft bristle brooms. No chemicals will be used.

5.3.3. Snow Maintenance

The O&M provider and/or its authorized subcontractors will clear snow from the access roads to all the electrical equipment pads as necessary. As required, snow will be plowed or removed in a manner to maintain emergency turnarounds. The Owner does not intend on removing snow from panels.

5.3.4. Fence Maintenance

The O&M provider and/or its authorized subcontractors will visually inspect the perimeter security fence in accordance with the schedule in Table 2 to identify any fence damage, issues that could undermine the integrity of the fence, or entrapped wildlife. If any injured or deceased wildlife is discovered, O&M provider will contact a wildlife expert to advise on next steps such proper relocation and/or rehabilitation of injured wildlife or proper removal and disposal of any deceased wildlife.

5.4. Long-Term Stormwater Maintenance Plan

The O&M team will provide maintenance in accordance with the approved stormwater maintenance plan produced by the engineer of record.

Table 2. Scheduled Maintenance Activity

Task	Frequency
Visual Array & Equipment Inspection	1x per year or per equipment manufacturer requirements
Mechanical and Electrical Inspections	1x per year or per equipment manufacturer requirements
Panel Cleaning	As Needed
Mowing and Trimming	2-3 times annually or more as required to maintain a safe site
Snow Removal	As needed
Perimeter Fence Inspection	3-4 times per year



6. Emergency Response Plan

This plan defines the procedures for preventing incidents, responding to incidents, post-incident procedures, and the proper reporting of the incident to the appropriate state and local officials, prior to re-energization of this Facility. The plan is designed to be utilized by facility operators, emergency personnel, public officials, and members of the public. It is designed to ensure compliance with Siting Council requirements, state and local regulations, and applies to the various types of incidents as further described below.

6.1. Emergency Contacts

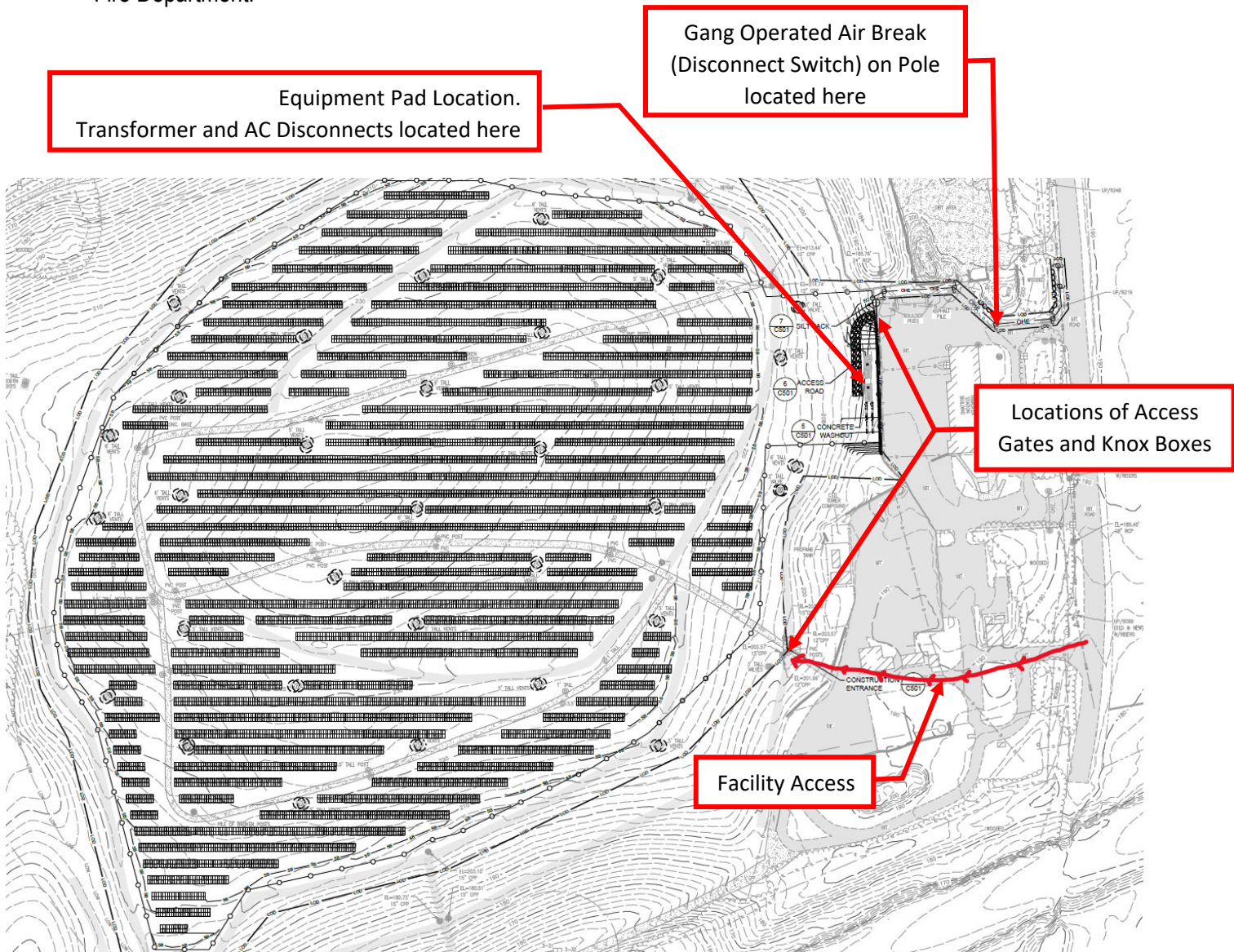
Table 3. Emergency Contacts

Emergencies	Dial 911
Groton Police Department	L.J. Fusaro, Chief of Police 68 Groton Long Point Road, Groton, CT 06340 Routine Calls: (860) 441-6712
Groton Fire Department	Nathan Shank, Fire Chief Richard Branche, Fire Marshall Center Groton Fire District 163 Candlewood Road, Groton, CT 06340
Connecticut Department of Energy & Environmental Protection (CT DEEP)	Routine Calls: (860) 445-5775 Spill Reporting Line, Emergency Response Unit): 860-424-3338 or 866-337-7745 Other Emergencies (DEEP Dispatch): 860-424-3333 General Contact: 860-424-3000
Utility Service Provider	Eversource Energy 800-286-2000
Connecticut Siting Council	10 Franklin Square, New Britain, CT 06051 860-827-2935
Facility Emergency Coordinator	(TO BE UPDATED WHEN FACILITY IS OPERATIONAL)



6.2. Facility Site Map and Access

The following map shows the location of the Facility disconnect switches and access way. The entrance gate will have a Knox Box for emergency responders. The final location of the Knox Box will be coordinated with the local Fire Department.



6.3. Emergency Scenarios and Response Procedures

6.3.1. Fire Emergency

Response Procedures:

1. Ensure Personal Safety:
 - Move everyone on site to a safe distance (at least 300 feet)
2. Notify Authorities:
 - Call 911 and report a fire at the facility
 - Contact the Facility Emergency Coordinator
3. Shut Down Facility (if qualified and safe to do so):
 - Engage emergency shutoff switches
 - Follow Lockout/Tagout (LOTO) procedures
4. Fire Suppression Measures:
 - Local Fire Department will perform fire suppression measures in accordance with department policies and procedures.
 - Local Fire Department will have the knowledge of the water supply locations for fighting fires.
5. Support Emergency Personnel as needed
6. Follow Spill Prevention Plan (if required)
7. Post-Incident Actions:
 - Conduct a damage assessment
 - Notify utility company if equipment is compromised

6.3.2. Medical or other Non-Fire Emergency

Response Procedures:

1. Assess the situation and call 911
2. If Necessary, Shut Down Facility (if safe and qualified to do so):
 - Engage emergency shutoff switches
 - Follow Lockout/Tagout (LOTO) procedures
3. Provide first aid (if safe and trained to do so)
4. Guide Emergency Responders to Site
5. Contact Facility Emergency Coordinator as soon as able
6. Support Emergency Personnel as needed
7. Post-Incident Actions:
 - Follow Company Reporting Policies and Procedures



6.4. Post-Incident Inspections and Reporting

- Following an incident the Facility operator should coordinate subsequent inspections with the utility company representatives, Fire Marshall, Building & Electrical Inspector, and employ the services of a licensed electrician
- Inspection of all components, including the panels, wiring, inverters, transformers, and any structural elements shall occur
- Any potential environmental concerns resulting from fire damage to panels and equipment or possible soil contamination shall be documented and reported to appropriate agency as required
- The condition of security fencing and access roads shall also be evaluated & reported post-incident
- Incident reports shall be prepared & provided, within 5 business days or less, to the CT Siting Council, Fire Marshall, and the utility provider
- Additionally, any requirements of the Spill Prevention Plan should be followed as required.

6.5. Post-Incident Re-Energization Procedures

- The Facility must remain off-line until all inspections and repairs have been completed and it has been deemed safe to operate
- Written permission to re-energize must be obtained from the Fire Marshall, Building & Electrical Inspector, and/or utility provider, if deemed necessary by those authorities
- Prior to re-energizing the Facility, the Facility Operator must notify the Fire Marshall, Building & Electrical Inspector, CT Siting Council, and utility provider,
- Once the required approvals have been received and notifications provided, the facility can be re-energized

