



## OPERATIONS, MAINTENANCE, AND EMERGENCY RESPONSE PLAN

### 1. Introduction

Upon completion of the Project, the Petitioner will enter into a third-party Operations and Maintenance (O&M) agreement with an experienced O&M provider (the **O&M Manager**). The O&M Manager employs qualified electricians, production analysts, and vegetation management personnel to ensure the Project operates safely, reliably, and at peak performance.

Prior to energization, the O&M Manager will conduct a comprehensive quality and safety inspection of the entire site to confirm that all mechanical and electrical components are installed in accordance with manufacturer specifications and approved design plans. The O&M Manager will also provide safety and emergency response training to Morris municipal personnel.

Following energization, the O&M Manager will assume responsibility for the ongoing health, safety, and operation of the facility.

The Project will be continuously monitored on a 24-hour, 7-day-per-week, 365-day-per-year basis through a remote data acquisition system (DAS). The DAS is capable of generating alarms related to communications, performance, or safety conditions. The O&M Manager maintains an on-call response team to address issues identified through remote monitoring and performs annual inspections and routine vegetation management activities.

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### 2. Scope of Work

#### 2.1 Monitoring and Operations

- Continuous monitoring (24/7/365)
- Alarm notification and response
- Remote diagnostics and corrective actions
- Remote power plant operation

#### 2.2 Performance Optimization

- Performance trend analysis
- Performance engineering support
- Data storage and reporting

#### 2.3 Annual Inspection, Testing, and Preventive Maintenance

The O&M Manager will conduct a comprehensive annual inspection focused on safety, reliability, and performance. A written inspection report will be generated. The inspection includes, but is not limited to, the following:

**Aerial Thermal Imaging** - Full-site UAV (drone) inspection of PV modules using thermal imaging and diagnostic software to identify module-level defects and inefficiencies



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**PV Modules** - Inspection of front and rear surfaces for broken glass, delamination, discoloration, cell damage, and conductor overheating - Inspection of module frames for cracking or deformation

**Tracker Drive Motors** - Mechanical inspection of anchorage, alignment, grounding, lubrication, and bolted connections - Electrical inspection, including thermography and power usage

**Mounting System** - Visual inspection for corrosion, settlement, or tilt - Verification of hardware tightness and grounding integrity - Measurement of ground resistance and re-torquing as necessary

**DC Combiners** - Inspection for corrosion, moisture intrusion, pests, and physical damage - Verification of labeling and signage - Thermographic inspection of terminations and overcurrent devices

**DC/AC Raceway and Disconnects** - Inspection for loose connections, corrosion, missing sealant, and moisture intrusion - Verification of labeling and thermographic inspection

**Inverters** - Inspection of enclosures, seals, ventilation components, and signage - Cleaning of air paths and screens - Inspection and replacement of surge protection devices as required - Thermographic inspection of terminations

**Medium Voltage Transformers** - Inspection of enclosures, anchorage, alignment, and signage

**SCADA / DAS** - Inspection and cleaning of enclosures and devices - Verification of sensor alignment and communication integrity

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### 3. Vegetation and Site Maintenance

#### 3.1 Vegetation Management

Sheep grazing will serve as the primary vegetation management method (see Exhibit 2, Sheep Grazing Plan). The site will be inspected regularly during the growing season to assess vegetation height, shading impacts, and erosion. Supplemental mowing or mechanical trimming may be used as needed. No herbicides or pesticides will be applied.

#### 3.2 Module Washing and Snow Removal

Module washing and snow removal will be performed on an as-needed basis. Due to module tilt, most snow, dust, and pollen are naturally shed. If cleaning is required, only commercially sourced clean water with no chemical additives will be used.

#### 3.3 Landscape Buffer Maintenance

Landscape buffers will be inspected up to three times per growing season. Dead or unhealthy plantings will be replaced as needed. During the first year after installation, landscape buffers will be watered in accordance with supplier requirements using clean, chemical-free water.



### 3.4 Perimeter and Fencing

The perimeter fencing will be inspected for damage, trapped wildlife, and litter during the annual inspection and periodically throughout the year in conjunction with routine vegetation management inspections.

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## 4. Emergency Contact Information

### Emergency Services

- **Emergency Dispatch:** 911
- **Connecticut State Police, Troop L:** (860) 953-9949 / (860) 626-7900  
452A Bantam Road, Litchfield, CT 06759
- **Morris Fire Company:** (860) 567-7441  
15 South Street, Morris, CT 06763
- **Fire Marshal:** firemarshal@morrisct.gov

### Project and Utility Contacts

- **Project Owner (LSE Phobos LLC):** (410) 274-2716  
18 North Main Street, 2nd Floor, West Hartford, CT 06107
- **Electric Utility (Eversource):** (800) 286-2000
- **Connecticut Department of Energy and Environmental Protection (DEEP):**
  - Spill Reporting / Emergency Response Unit (24-hour): 860-424-3338 or 1-866-337-7745
  - DEEP Dispatch: 860-424-3333
  - General Contact: 860-424-3000

### Notification Protocols by Emergency Type

- **Fire / Electrical Hazard:** Call 911 immediately, then notify DEEP.
  - **Trespass / Vandalism / Security Breach:** Contact local police and the facility operator.
  - **Severe Weather Damage (storm, flooding, ice):** Notify DEEP and Eversource to coordinate system status and public safety.
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## 5. Site Access and Fire Suppression Resources

**Site Access:** A 12-foot-wide access road off South Street provides access to the array and equipment pads. A cleared perimeter access aisle at least 16 feet wide will be maintained between the array and fencing to accommodate emergency vehicles.

**Water Supply:** No fire hydrants are located within 0.25 miles of the site. Fire response will rely on the Morris Fire Department, located approximately 0.9 miles from the Project.



**Fire Department Equipment:** The Morris Fire Station is equipped with multiple engines providing onboard water supply, including: - Engine 1: 1,000 gallons - Engine 3: 1,250 gallons - Engine 5: 1,500 gallons

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## 6. Emergency Shutdown Procedures

### Grid-Side Shutdown

The Project includes a manual Grid-Operated Air Break (GOAB) switch located on the fourth utility pole from the roadway.

Activating the GOAB switch: - De-energizes the entire Project from the electrical grid - Stops power flow to and from the site - Reduces electrical hazards during emergency access

The GOAB switch is clearly marked, normally locked, and operable by trained emergency responders. Information regarding GOAB location and operation will be provided prior to construction and during pre-energization emergency responder training.

If the GOAB switch cannot be accessed, power may be shut off on the utility side at the point of interconnection in coordination with the electric utility.

### Site-Side Shutdown

If grid-side shutdown is not feasible, the system may be de-energized in the following sequence: 1. Open the AC disconnect located on the equipment pad. 2. Turn off the DC disconnects on all inverters located on the equipment pad. 3. Open the DC disconnects at the combiner boxes throughout the array.

**Electrical Safety Warning:** - PV modules continue to generate DC electricity when exposed to sunlight, even after shutdown. - Module-level conductors and connections remain energized. - Emergency responders must not cut or handle electrical wiring.

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## 7. Fire Response Protocols

### Brush or Vegetation Fires

- Call 911 immediately.
- Evacuate the site safely; do not attempt to fight large fires unless trained.
- Protect the perimeter and allow vegetation beneath arrays to burn out if necessary.
- Apply water around the fire; do not apply water directly to electrical equipment.
- Notify the facility operator, DEEP, and Eversource.

### Electrical or Equipment Fires

- Call 911 immediately.



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- Do not touch or attempt to extinguish energized equipment.
  - De-energize the facility using the GOAB switch.
  - Use clean-agent or chemical extinguishers only for small fires and only after shutdown.
  - Evacuate the area and maintain a safe distance.
  - Notify the facility operator, DEEP, and Eversource.
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## 8. Incident Reporting and Re-Energization

Following any fire or significant incident, the Project Owner will conduct a root cause analysis and prepare an incident report. Reports will be provided to applicable municipal, state, and regulatory agencies, including the Connecticut Siting Council and Eversource.

Prior to re-energization, a detailed safety inspection will be completed. The facility will not be re-energized until approval is received from a licensed electrical inspector, the local fire marshal, and Eversource. Notification will also be provided to Eversource, the Connecticut Siting Council, DEEP, and the local fire department.

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## 9. Incident Report Form

### Accident, Injury, and Root Cause Analysis Report

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#### *A. General Incident Information*

- **Project Name:**
  - **Department / Division:**
  - **Date of Incident:**
  - **Time of Incident:**
  - **Day of Week:**
  - **Location of Incident:**
  - **Vehicle Number / Type (if applicable):**
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#### *B. Incident Classification (check all that apply)*

- ☐ First Aid Only
  - ☐ Doctor Visit
  - ☐ Emergency Care
  - ☐ Restricted Duty
  - ☐ Lost Time Injury
  - ☐ Near Miss
  - ☐ Property / Equipment Damage Only
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#### *C. Accident Description*

Provide a detailed description of what happened, including the sequence of events leading up to the incident:



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*D. Injury Information (if applicable)*

- **Injured Employee Name:**
  - **Date of Injury:**
  - **Sex:**
  - **Age:**
  - **Employment Status:**  
☐ Full-Time ☐ Part-Time ☐ Seasonal ☐ Temporary
  - **Regular Assigned Position:**
  - **Length of Time in Position:**
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*E. Work Conditions at Time of Incident*

- Was the employee performing regular job duties? ☐ Yes ☐ No  
If no, explain:
  - Was the employee working overtime? ☐ Yes ☐ No  
If yes, explain:
  - Does the employee work a rotating shift? ☐ Yes ☐ No
  - Was there a recent change in shift or schedule? ☐ Yes ☐ No  
If yes, explain:
- 

*F. Injury Details (if applicable)*

- **Body Part Injured:**
  - **Type of Injury (e.g., strain, laceration, burn):**
  - **Severity Description:**
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*G. Training and Preventive Measures*

- Has the employee received training related to prevention of this type of incident? ☐ Yes ☐ No
- **Training Description:**
- **Training Date(s):**



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#### *H. Equipment, Property, or Environmental Damage*

- **Description of Damage:**
  - **Estimated Cost of Damage:**
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#### *I. Emergency Response and Reporting*

- Were police or emergency responders called? ☐ Yes ☐ No
  - **Police Report Number (if applicable):**
  - **Emergency Response Actions Taken:**
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#### *J. Witness Information (attach written statements if available)*

| Name | Job Title | Telephone |
|------|-----------|-----------|
|      |           |           |
|      |           |           |
|      |           |           |
|      |           |           |

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#### *K. Root Cause Analysis*

Identify the underlying causes of the incident (check all that apply and explain):

- ☐ Unsafe Act
- ☐ Unsafe Condition
- ☐ Equipment Failure
- ☐ Inadequate Training
- ☐ Inadequate Procedures
- ☐ Environmental Conditions
- ☐ Human Factors
- ☐ Other (describe):



**Root Cause Explanation:**

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*L. Corrective and Preventive Actions*

| Corrective Action | Responsible Party | Target Completion Date | Status |
|-------------------|-------------------|------------------------|--------|
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*M. Authorization and Review*

- **Prepared By:**
  - **Title:**
  - **Date:**
  - **Reviewed By:**
  - **Title:**
  - **Date:**
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*This form is intended to document incidents, identify root causes, and establish corrective actions to prevent recurrence.*