

Orr&Reno

June 20, 2014

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Via U.S. and Electronic Mail
NH Site Evaluation Committee
c/o Jane Murray, Secretary
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095


Re: Docket 2010-01, Groton Wind, LLC

Dear Ms. Murray:

On behalf of Groton Wind, LLC, enclosed for filing with the Site Evaluation Committee in the above-captioned docket, please find an original and 2 copies of Groton Wind Plant's Emergency Plan which has been accepted by the State Fire Marshal's Office. Chairman Burack requested this document at last week's status conference in the above-captioned docket.

Please contact me if there are any questions about this filing. Thank you for your assistance.

Very truly yours,


Susan S. Geiger

Lawrence A. Kelly
(Of Counsel)

Neil F. Castaldo
(Of Counsel)

cc: Service List (electronic mail only)
Enclosures
1164108_1



Groton Wind Plant Emergency Plan

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Name: Ryan Haley

Title: Plant Manager

Date: 04/11/2014



Groton Wind Plant Emergency Plan

1. PURPOSE

- 1.1. This plan outlines the actions to be taken by Iberdrola Renewables (IR) employees at the Groton Wind Plant in the event of emergencies. This plan is intended to comply with the requirements of NFPA 1-2009.

2. SCOPE

- 2.1. This plan applies to Iberdrola's employees who provide operations and maintenance tasks at the Groton Wind Plant and may apply to contractor employees or visitors engaged in operations and maintenance activity as expressly provided in this plan.

3. DUTIES AND RESPONSIBILITIES

3.1. Regional Directors

- 3.1.1. Provide plant management with adequate resources and support to carry out their responsibilities.
- 3.1.2. Require plant management adherence to this plan.

3.2. Plant Manager

- 3.2.1. Assume the role of person in charge during emergencies, or designate an individual to be the person in charge during emergencies.
- 3.2.2. Ensure that each employee has been trained in and complies with this plan.
- 3.2.3. Ensure all materials and hardware for effective implementation of this plan are provided, properly utilized, and maintained.
- 3.2.4. Ensure Plant Drawing and Map and Emergency Contact List are current. Also ensure that these are posted in conspicuous location(s)
- 3.2.5. Ensure proper notifications are made in the event of an emergency.
- 3.2.6. Ensure that all employees, subcontractors, and visitors are accounted for during an evacuation event by comparing names of personnel at the assembly area(s) with the names of personnel on the visitor log or employee sign-in log.
- 3.2.7. Interface with and assist local authorities and emergency response personnel during emergencies.
- 3.2.8. Ensure inspections are completed and discrepancies are corrected in a timely manner.
- 3.2.9. Periodically test emergency response procedures by conducting at least one emergency drill each calendar year.
- 3.2.10. Perform and annual review and update of this plan

3.3. EHS Department

- 3.3.1. When requested, review this program and update as needed.
- 3.3.2. Provide assistance to Groton Wind Plant in the event of an emergency as requested.

3.4. Technicians

- 3.4.1. Comply with this program.

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- 3.4.2. Assume the role of person in charge in the absence of the Plant Manager or if designated as such.
- 3.4.3. Participate in hazard assessments.
- 3.4.4. Stop work if conditions change or personnel safety is at risk.
- 3.4.5. Perform required inspections, document and correct discrepancies in a timely manner. Report any discrepancies found to the Plant Manager or designee.

4. GENERAL

4.1. **Notifications:**

- 4.1.1. In the event of an emergency, employees and contractors shall notify the Plant Manager or designee as soon as possible.
- 4.1.2. Plant Manager or designee will need to make notifications in the event of an emergency. Each emergency response procedure identifies the notification requirements based upon the severity of the emergency.
- 4.1.3. During minor events, the Plant Manager will notify the Regional Director. During major events, the Plant Manager will notify the NCC, and the NCC will continue with the notifications to allow the Plant Manager time to manage the situation.

Note: The Plant Manager should inform the NCC when the event is over, the situation is stabilized or the drill has ended. Close the communication loop.

- 4.1.4. Notifications shall be made using telephones, cell phones, radios or in person communications.
- 4.1.5. When Regional Directors are notified of an event, they will make appropriate notifications as follows:
 - a. During minor events, the Regional Directors will notify the EHS Department and the Managing Director Field Services. A determination should be made regarding further notifications.
 - b. During major events, the Regional Director will make notifications to the Managing Director, Field Services and to other departments such as: Legal, Compliance Office, HR, Corporate Communications, EHS & Business Management as applicable. If the Managing Director, Field Services is not available, the Regional Director shall notify the VP Commercial Operations. If the VP Commercial Operations is not available, the Regional Director shall notify the EVP Renewables and CEO if necessary. The above mentioned personnel will work together to coordinate communications to other departments. Events that require this level of notification include:
 - 1) Any event where 911 was called or emergency services responded to the plant for an emergency.
 - 2) Any event where catastrophic equipment damage was sustained.
 - 3) Any event which poses a safety hazard to the public.
 - 4) Any event where the media may become involved.
 - c. The notifications of b) above should be made by the Managing Director, Field Services if the Regional Director is unavailable, or the Vice President, Commercial

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Operations if both the Regional Director and Managing Director, Field Services are unavailable, or the EHS Director if the Regional Director, Managing Director, Field Services and Vice President, Commercial Operations are unavailable.

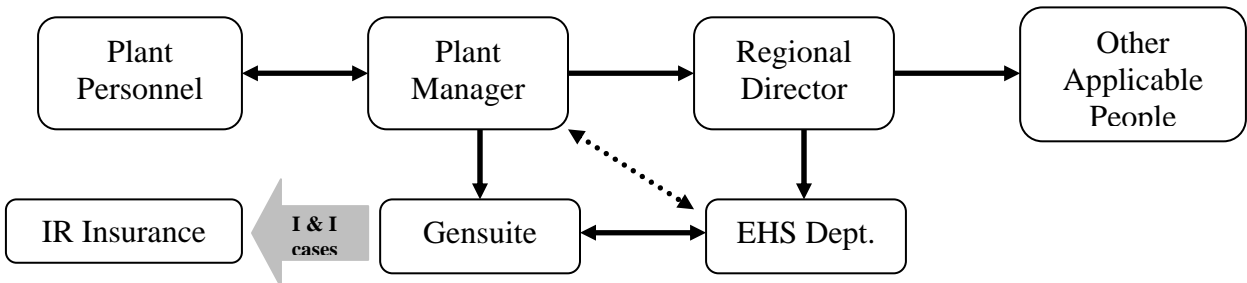
4.1.6. Methods of notification are as follows:

- a. During normal business hours, call the office number of the person who is to be notified.
- b. If there is no answer on the office number, call the mobile number of the person who is to be notified.
- c. If there is no answer on the mobile phone, send an email to the person who is to be notified stating, “please call as soon as possible.”

***Note:** During the initial notification of an emergency, notifications should continue until verbal communications are achieved. (Don't stop notifying until you speak with someone) An email is not sufficient notification during an emergency. Step c) above is to ensure the person who is supposed to be notified will know that an event had occurred.*

4.1.7. Flow Chart-1 below is a guideline for reporting minor events which may occur at Groton Wind Plant.

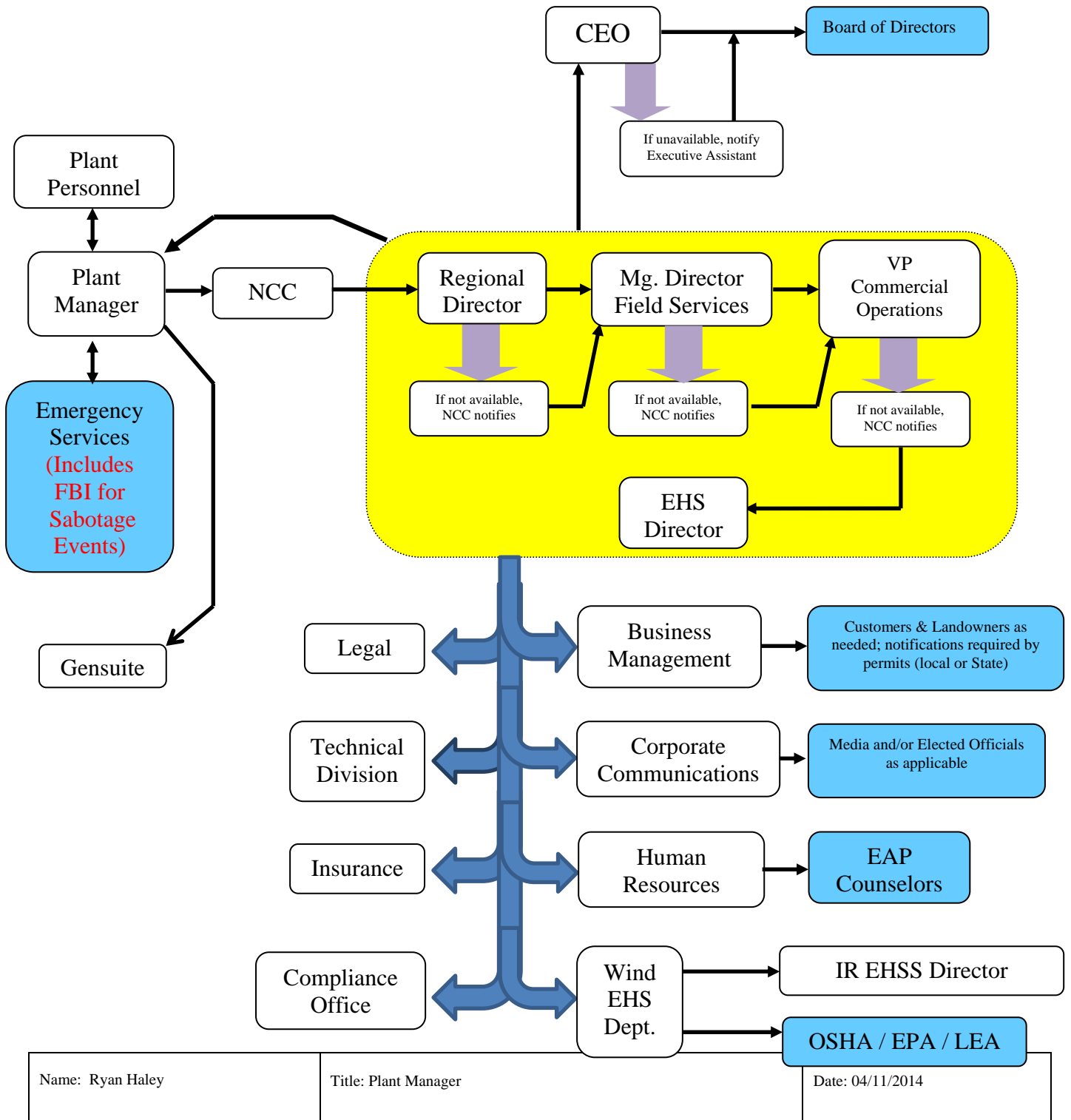
Flow Chart-1



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4.1.8. Flow Chart-2 below is a guideline for reporting minor events which may occur at Groton Wind Plant.

Flow Chart-2





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4.2. **Emergency Response Kit:**

- 4.2.1. At Groton Wind Plant, each pair of technicians shall have one emergency response kit with them when they ascend wind turbines. The kits shall contain at a minimum, the following:
- An approved emergency descent/tower rescue device(s).
 - A “Basic First Aid Kit.”
 - Two fire blankets.
 - Eyewash bottle(s).

4.3. **Inspections:**

- 4.3.1. All emergency response equipment shall be inspected monthly. Groton Wind Plant emergency response equipment will be listed on an inspection form in order to document the aforementioned inspection.
- 4.3.2. Any discrepancy which is identified during the inspection shall be corrected as soon as possible. If the discrepancy is on a piece of emergency response equipment, that equipment shall be taken out of service until the discrepancy is corrected and a different piece of emergency response equipment shall be placed into service.
- 4.3.3. Fire Extinguishers:
- Verify the extinguisher is in the correct location.
 - Verify the extinguisher has unobstructed access and visibility.
 - Verify the pressure gauge reading is in the operable range.
 - Verify the extinguisher has no visible damage.
- 4.3.4. Eyewash/Shower stations:
- Verify unobstructed access and visibility to the emergency eyewash and shower stations.
 - Verify proper operation of the emergency eyewash and shower stations.
 - Verify the emergency eyewash station is clean and caps are installed.
 - Verify all eyewash bottle(s) have unbroken seals and are not beyond their expiration date.
- 4.3.5. First Aid Kits:
- Verify that each Basic First Aid Kit has the minimum required items as defined in ANSI Z-308.1-2009.
 - Verify that any medications in first aid kits are not beyond their expiration date.
 - Verify unobstructed access and visibility to mounted first aid kits.
- 4.3.6. AED’s:
- Verify unobstructed access and visibility to mounted AED’s.
 - Verify AED batteries are in good condition and not beyond their expiration date.
 - Verify AED pads are not beyond their expiration date.
 - Verify the AED’s have no visible damage.
- 4.3.7. Emergency Lighting:

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- a. Verify emergency lighting works when the test button is pushed. This is an operational test of the batteries.
- 4.3.8. Spill Kits:
 - a. Verify absorbent material and empty drums are available.
- 4.3.9. Emergency Exits:
 - a. Verify emergency exits are clearly marked at the exit and on the plant map.
 - b. Verify lighted exit signs are illuminated.
 - c. Verify unobstructed access to each emergency exit; on both sides of the door exist.
- 4.3.10. Housekeeping Inspections:
 - a. Verify areas are neat, clean and free from debris.
 - b. Ensure designated smoking area is free from debris and the ash can is not full.
 - c. Inspect electrical cords to ensure no electrical hazards exist. Also ensure that no portable cords are being used for permanent power.
 - d. Inspect for unusual odors or visible airborne contaminants (Dust, fumes, mists, vapors).
 - e. Ensure electrical cords do not contact with water.
 - f. Inspect areas for any combustible material which may have been improperly stored or left behind after work tasks were performed.
 - g. Inspect for flammable liquid leaks/spills including fuels or lubricants.
 - h. Ensure all flammable materials are properly stored in approved containers and are in in Flammable Cabinets if applicable.
 - i. Ensure secondary containments/sumps are free from oil and debris.
 - j. Ensure waste is stored properly. This includes oily waste and oily rags.
 - k. Ensure all containers are properly labeled.
 - l. Ensure fire doors remain closed.
 - m. Ensure all emergency response equipment is clearly marked and there is unobstructed access to this equipment.

4.4. **Drills:**

- 4.4.1. Employees at Groton Wind Plant should perform periodic drills to test the emergency response procedures herein.
- 4.4.2. Drills should be properly planned, then conducted. When the drill is complete, a de-brief should be performed to ensure immediate and secondary actions were carried out. The de-brief should include plant personnel who participated in the drill. Others such as management or the NCC should be invited to participate in the de-brief as applicable. Lessons learned shall be documented and shared with the EHS Department so that improvements of the procedures can be made. All drills should be documented.
- 4.4.3. Local emergency services should be invited to participate in emergency drills. This includes the planning, execution and debrief phases of the drill.

5. PLANT DRAWING AND MAP & EMERGENCY CONTACT LIST

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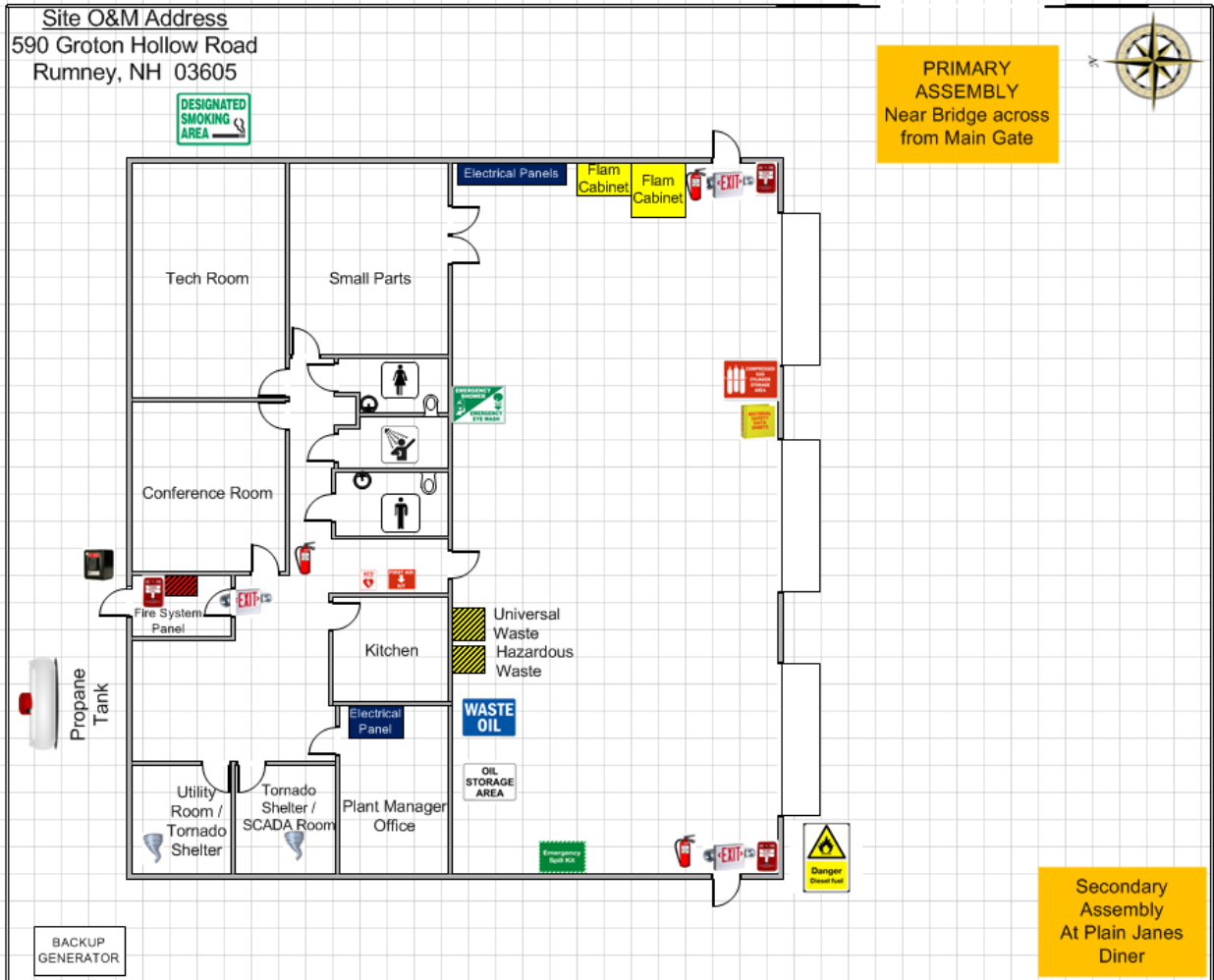
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- 5.1. Groton Wind Plant has created and posted a plant drawing and map which identifies the following items:
 - 5.1.1. The O&M building, including the perimeter fence.
 - 5.1.2. Emergency response equipment locations for: eyewash, AED's, first aid kits, fire extinguishers, spill kits.
 - 5.1.3. Emergency Exits.
 - 5.1.4. Primary and Secondary Assembly areas.
 - 5.1.5. Evacuation routes from each room.
 - 5.1.6. Known Hazardous areas, such as waste/oil, chemical and flammable storage areas.
 - 5.1.7. Propane and or fuel tanks.
 - 5.1.8. Plant name and address.
 - 5.1.9. Compass Rose.
 - 5.1.10. Power Source to the O&M Building.
 - 5.1.11. MSDS Location.
 - 5.1.12. Fire alarm pull stations and fire alarm control panel locations.
 - 5.1.13. Ensure directions to trauma center are included.
 - 5.1.14. Plant drawing shows turbine locations, substation, 911 addresses or coordinates for each turbine and landing coordinates for Life-Flight or Medivac services if applicable. This additional information, if available, should be shared with emergency services including the 911 operator.
 - 5.1.15. Plant Manager or designee shall review and update if necessary, the plant drawing and map at least once each calendar year.

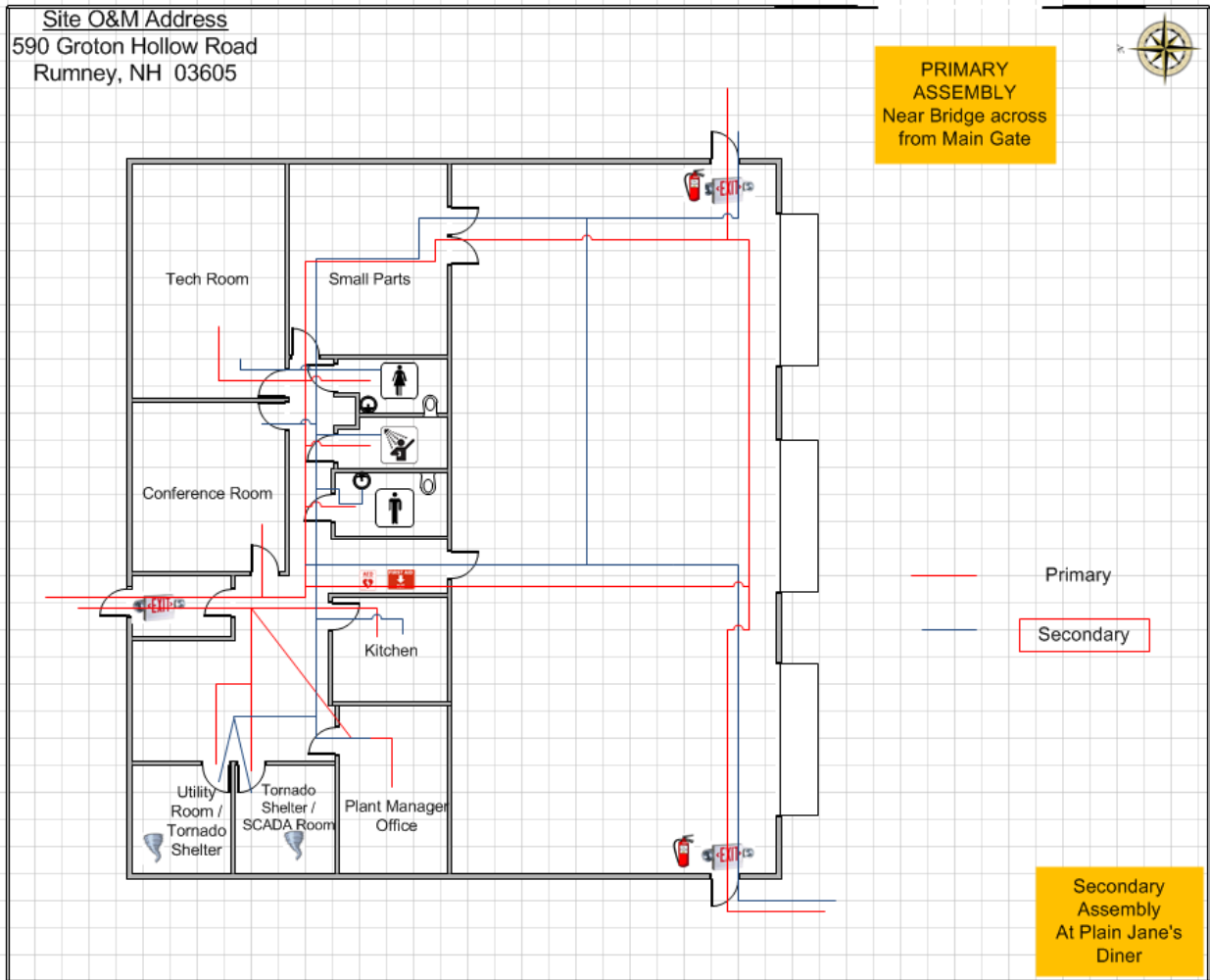
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Title: Plant Manager

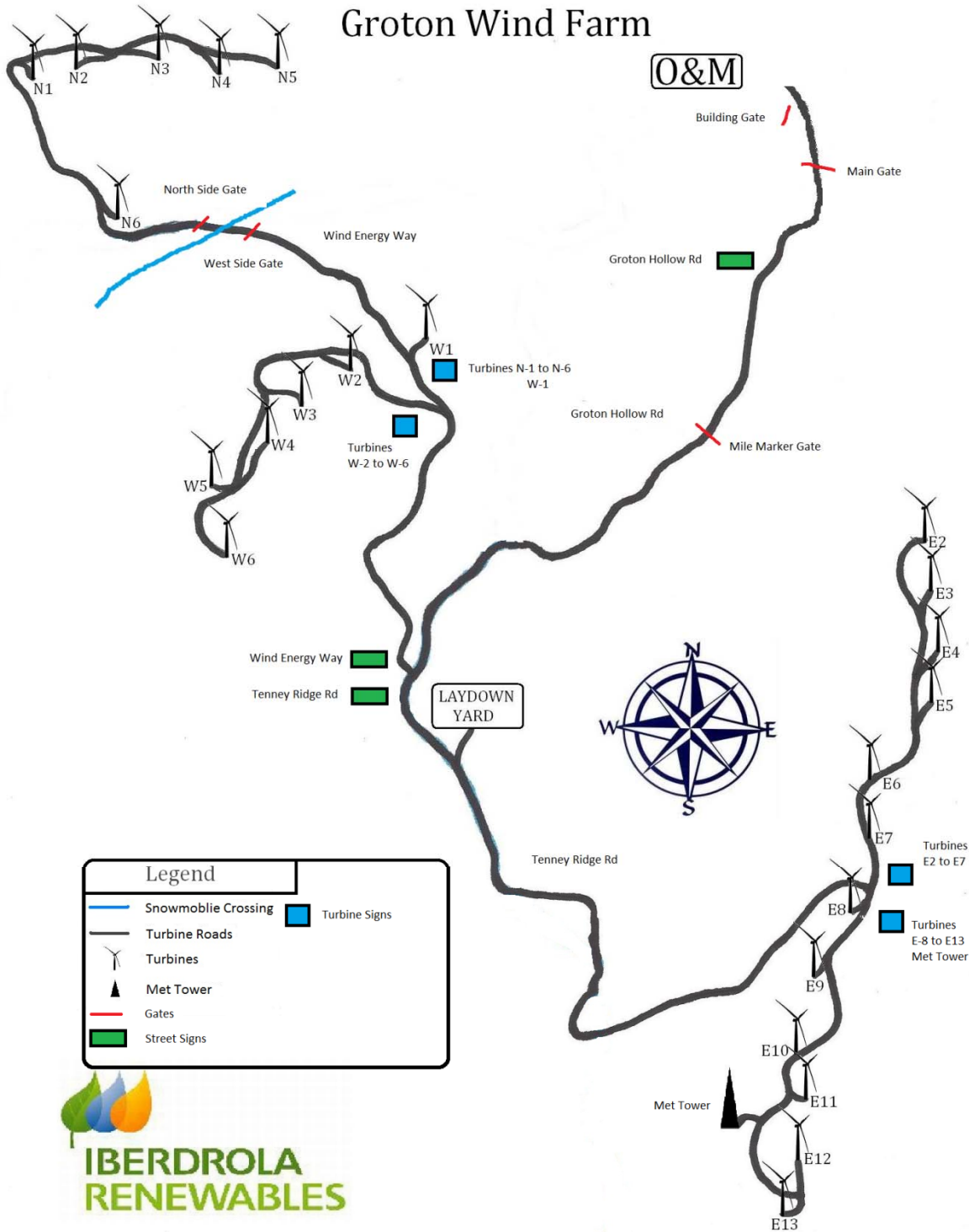
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- 5.2. Groton Wind Plant has created and posted an Emergency Contact List.
 5.2.1. Plant Manager or designee shall update and verify accuracy of each of the Emergency Contact List at least once every calendar year.

EMERGENCY CONTACT LIST		
EMERGENCY - CALL 911		
SITE EMERGENCY:	Site Address: 590 Groton Hollow Rd. Rumney, NH 03266 Site Phone/Fax: N/A / 815 915 3862 Directions: 1.1 miles south on Groton Hollow Rd.	
	Ryan Haley <small>PRIMARY CONTACT NAME</small>	815 - 915 - 3862 <small>24 HR. CONTACT #</small>
	Scott Van Haltern <small>SECONDARY CONTACT NAME</small>	603 - 359 - 3141 <small>24 HR. CONTACT #</small>
<i>Unless otherwise noted, the contact numbers listed below are NON EMERGENCY only</i>		
LAW ENFORCEMENT:	Sheriff Department	603 - 787 - 6911
FIRE:	Rumney Fire Department	603 - 786 - 9924
FBI:	FBI Boston	617 - 742 - 5533
HOSPITAL:	Spears Hospital (Plymouth, NH) 603 - 536 - 1120 16 Hospital Rd, Plymouth, NH 03264	
Emergency Fire/EMS/Police:	Dial 911 or 603-534-5252	
24 HOUR HOTLINE	National Control Center	1 866 - 351 - 5657
Regional Director:	Jim Eppley	864 - 871 - 2951
EHS Point of Contact	Dennis Winn	503 575 0897
Other	Stephanie Carey	971 285 2653
Other	Joshua Lemmon	603 443 7995
Environmental Protection Agency or State Agency		888 - 372 - 7341
Occupational Health and Safety		603 - 225 - 1629
Poison Control		800 - 222 - 1222
Road Conditions		866 - 282 - 7579
Worker's Compensation		603 - 271 - 3176
Emergency Radio Stations:		WX -162.475 MHz
Please Post Conspicuously Near Site Phones - Update All When Changes Are Made - Copies are saved on the Wind Ops website		

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6. EMERGENCY RESPONSE PROCEDURE

Note: This procedure is intended to notify all personnel at the plant that an emergency is underway and personnel need to meet in a designated location(s) to either be accounted for, render assistance or both.

- 6.1. Anyone observing an emergency condition should immediately contact the Plant Manager or designee by any method possible including, in person, by radio or by phone
- 6.2. The Plant Manager, or designee, will initiate this procedure notifying all on-site personnel via radio or telephone or other means.
 - 6.2.1. Announce, "Initiate emergency response procedure." AND designate the assembly location(s).
- 6.3. Upon initiating emergency response procedure, personnel shall immediately assemble in the designated location(s).
- 6.4. If emergency response resources are needed, the Plant Manager, or designee, will phone 911, request appropriate emergency services, and provide all pertinent information concerning the emergency.
- 6.5. The Plant Manager, or designee, shall assign personnel to the following duties:
 - 6.5.1. Send person(s) to meet Emergency Responders.
 - 6.5.2. Assign Person(s) to account for all personnel at the Plant:
 - a. This person will utilize the visitor log and plant employee sign-in log to ensure all personnel are accounted for.
 - b. This person will report the status to the Plant Manager or designee.
 - 6.5.3. If required, assign personnel to locate any missing persons.
 - 6.5.4. Call in additional employees, if available and necessary.
 - 6.5.5. Assign personnel additional duties as necessary.
- 6.6. Plant Manager or designee shall coordinate communications between the above personnel.
- 6.7. Plant Manager or designee shall assess the emergency and meet with Emergency Response Personnel to coordinate appropriate steps.
- 6.8. If an evacuation is necessary initiate the **Plant Evacuation** procedure below.

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7. PLANT EVACUATION

7.1. Initiating Evacuation:

- 7.1.1. Perform the applicable steps of the **Emergency Response Procedure** above.
- 7.1.2. Plant Manager or designee will use the radios, cell phones or other means to contact and inform all personnel at the plant to evacuate.
 - a. During this announcement, the Plant Manager shall designate whether personnel should meet at the primary, secondary or an alternate assembly area.
- 7.1.3. Upon notification of an evacuation, all personnel at the plant shall immediately:
 - a. Stop work.
 - b. If time permits, place equipment in a safe static condition.
 - c. Evacuate from the nearest, safest exit point and report to the assembly area that was designated during the evacuation announcement in a) above. Refer to the plant drawing and map.
 - d. If for some reason personnel are unable to meet at the assembly area that was designated during the evacuation announcement in a) above, they should find another assembly area where they will be safe from the emergency and notify the Plant Manager or designee of their location.
- 7.1.4. Personnel shall report their status to the Plant Manager or designee when they have arrived at the designated assembly area.
- 7.1.5. Plant Manager or designee shall notify the National Control Center (NCC) that the plant is being evacuated and the reason for the evacuation.
- 7.1.6. The National Control Center (NCC) shall make the following notifications sharing the information they received from the Plant Manager:
 - a. NCC shall attempt to notify the Regional Director of the Groton Wind Plant and inform him or her that the plant is being evacuated and the reason for the evacuation. The Regional Director shall make additional internal notifications as appropriate.
 - b. If the Regional Director is unable to be contacted, the NCC shall attempt to notify the Managing Director, Field Services that the Groton Wind Plant is being evacuated and the reason for the evacuation.
 - c. If the Managing Director, Field Services is unable to be contacted, the NCC shall attempt to notify the Vice President, Commercial Operations that the Groton Wind Plant is being evacuated and the reason for the evacuation.
 - d. If the Vice President, Commercial Operations is unable to be contacted, the NCC shall attempt to notify the EHS Director that the Groton Wind Plant is being evacuated and the reason for the evacuation.
 - e. NCC shall follow outage notification procedures as applicable.
- 7.1.7. Plant Manager or designee should initiate other applicable emergency response procedures.
- 7.1.8. Once the situation is stabilized and all personnel are accounted for, the Plant Manager may send non-essential personnel home if warranted.

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***Note:** Prior to sending people home, the Plant Manager should ensure each person understands the procedure for obtaining permission to return to the plant.*

7.1.9. Plant Manager shall provide updates of the situation to their Regional Director or management personnel in their chain-of-command if the Regional Director is unavailable.

7.2. Securing from evacuation:

- 7.2.1. The Plant Manager or designee shall notify the NCC prior to securing from evacuation.
- 7.2.2. Plant Manager shall meet with appropriate plant personnel to discuss the plant re-entry method(s).
- 7.2.3. Personnel entering should conduct a hazard assessment to determine potential hazards associated with re-entering the plant. This assessment shall include what actions will be taken to mitigate any potential hazards. This information shall be shared with all personnel who will be performing the initial re-entry of the plant.
- 7.2.4. Re-enter the plant and perform an inspection of affected areas to identify any existing hazards and assess the status of the plant.
 - a. Correct the hazards on the spot if able.
 - b. If unable to correct the hazards, mark/guard them using barrier tape, or other means and communicate these hazards to other personnel entering the plant. Limit access to all non-essential personnel and only personnel who understand the hazards, how they are identified and what controls have been put in place to provide protection.
- 7.2.5. Once the plant has been made safe for other personnel to enter, the Plant Manager may allow access to the plant.
- 7.2.6. The Plant Manager or designee and the Regional Director shall assess potential impact to business operations and take appropriate actions.
- 7.2.7. Prior to securing from the evacuation, the Plant Manager shall discuss the status of the plant with their Regional Director, and other stakeholders as applicable.

***Note:** Regional Director may request assistance from their assigned Asset Manager on issues where property damages may have occurred.*

- 7.2.8. Plant Manager or designee should keep notes of occurrences so that lessons learned can be understood and communicated.
- 7.2.9. Log the event which prompted the evacuation.

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8. FIRE

8.1. Incipient & Beyond Incipient Fires:

- 8.1.1. If possible, disconnect power to the affected equipment or building if this can be done safely.
- 8.1.2. If fire is in the incipient stage, and you are trained to do so, use fire extinguisher(s) to put the fire out. When fighting a fire, ensure you have an unobstructed exit route. If the fire is extinguished, omit steps 8.1.3 through 8.1.10 below.
- 8.1.3. If the fire is beyond the incipient stage, immediately evacuate the area, position yourself a safe distance from the fire and limit access to the area. If applicable, activate the fire alarm by initiating the pull-box.
- 8.1.4. Notify Plant Manager, or designee.
- 8.1.5. Plant Manager or designee – Initiate the **Emergency Response Procedure** above. Emergency services will respond to the fire.
- 8.1.6. Plant Manager or designee - initiate **Plant Evacuation** above if needed.
- 8.1.7. Plant Manager or designee – Notify the NCC. Include plant name and any known details regarding the fire including emergency services have been called.
- 8.1.8. The National Control Center (NCC) shall make the following notifications sharing the information they received from the Plant Manager:
 - a. NCC shall attempt to notify the Regional Director of the Groton Wind Plant and inform him or her of the fire and if applicable, the plant evacuation. The Regional Director shall make additional internal notifications as appropriate.
 - b. If the Regional Director is unable to be contacted, the NCC shall attempt to notify the Managing Director, Field Services that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation.
 - c. If the Managing Director, Field Services is unable to be contacted, the NCC shall attempt to notify the Vice President, Commercial Operations that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation.
 - d. If the Vice President, Commercial Operations is unable to be contacted, the NCC shall attempt to notify the EHS Director that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation.
- 8.1.9. NCC shall follow outage notification procedures as applicable.
- 8.1.10. If time permits, and it is safe to do so, remove vehicles from immediate vicinity.

Note: It is not uncommon for the media or others to listen to emergency services scanners, so it is likely that the media may show up to the plant and ask questions about the fire or for phone calls to be received regarding the event.

- 8.1.11. Plant Manager or designee shall not answer any questions from the media regarding the fire. Inform the media that our company policy is that all media inquiries must be answered by the Communications Department. Provide them with the Communications Director phone number or take the media's contact information and

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inform them that a person from the Communications Department contact them. The statement below is to be used with media and others not in the reporting chain of command.

“We had had an event at the Groton Wind Plant. We are investigating the situation and we will not be making any further comment until verified information becomes available. In the meantime we are focusing our efforts on the safety of our employees and the public”.

- 8.1.12. Once the fire is out and the situation is under control and stabilized, the Plant Manager or designee shall notify the Regional Director of the status of the plant including any damage that may have occurred and potential impact to business operations. Appropriate actions shall be identified and carried out including needed resources to send to the plant if applicable.
- 8.1.13. Plant Manager or designee shall begin collecting data for an investigation while the incident is fresh. This may require the witnesses to write statements or taking photographs.
- 8.1.14. Limit access to the affected area until it is known to be safe. Mark the restricted area with barrier tape or by other means.
- 8.1.15. Log this event.

8.2. **Fire or Explosion in a Wind Turbine:**

***Note:** IR employees do not fight fires in wind turbines with the following exceptions: 1) if the fire is in the base of the turbine and it is in the incipient stage, and the person has been trained in the use of a fire extinguisher and there is not chance the fire will block egress, or 2) a trained fire watch performing his or her duties while hot work is occurring and all other controls are in place such as ventilation and guarding. When the fire watch is properly performing his or her duties, they are identifying and quenching hot embers/sparks prior to these becoming an incipient fire.*

- 8.2.1. If a fire is discovered and/or a fire alarm activates while personnel are working in the turbine, they shall immediately evacuate; if needed for safe evacuation, throw a fire blanket on the fire or wrap the fire blanket around you for safe egress.
- 8.2.2. Perform rescue activities if applicable.
- 8.2.3. After evacuating the wind turbine, position yourself a safe distance away and limit access to the turbine.
- 8.2.4. If individuals have been injured, seek appropriate medical attention for the victim(s).
- 8.2.5. De-energize the turbine from the safest location possible.
- 8.2.6. Notify the Plant Manager or designee.
- 8.2.7. Plant Manager or designee – Initiate **Emergency Response Procedure** above. Emergency services will fight the fire.

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- 8.2.8. Plant Manager or designee – Initiate **Plant Evacuation** above, if needed.
- 8.2.9. Plant Manager or designee – Notify the NCC of a fire at the Groton Wind Plant, turbine number, whether or not there are any injured personnel, whether or not the plant has been evacuated, which emergency services have been notified, and plant status.
- 8.2.10. The National Control Center (NCC) shall make the following notifications sharing the information they received from the Plant Manager:
 - a. NCC shall attempt to notify the Regional Director of the Groton Wind Plant and inform him or her of the fire and if applicable, the plant evacuation, the status of injured personnel and emergency services. The Regional Director shall make additional internal notifications as appropriate.
 - b. If the Regional Director is unable to be contacted, the NCC shall attempt to notify the Managing Director, Field Services that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation, the status of injured personnel and emergency services.
 - c. If the Managing Director, Field Services is unable to be contacted, the NCC shall attempt to notify the Vice President, Commercial Operations that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation, the status of injured personnel and emergency services.
 - d. If the Vice President, Commercial Operations is unable to be contacted, the NCC shall attempt to notify the EHS Director that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation, the status of injured personnel and emergency services.
- 8.2.11. When emergency services arrive, recommend to them that there are significant hazards associated with spraying water on equipment which may be energized with high voltage. The electrical equipment should be de-energized with physical (visual) disconnect(s) open and Lockout/Tagout applied prior to spraying it with water.
 - a. Fire Department officials may want to sign onto the Lockout/Tagout to ensure safety of their personnel. This is acceptable and should be encouraged.

Note: It is not uncommon for the media or others to listen to emergency services scanners, so it is likely that the media may show up to the plant and ask questions about the fire or for phone calls to be received regarding the event.

- 8.2.12. Plant Manager or designee shall not answer any questions from the media regarding the fire. Inform the media that our company policy is that all media inquiries must be answered by the Communications Department. Provide them with the Communications Director phone number or take the media's contact information and inform them that a person from the Communications Department contact them. The statement below is to be used with media and others not in the reporting chain of command.

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“We had had an event at the Groton Wind Plant. We are investigating the situation and we will not be making any further comment until verified information becomes available. In the meantime we are focusing our efforts on the safety of our employees and the public”.

- 8.2.13. Once the fire is out and the situation is under control and stabilized, the Plant Manager or designee shall notify the Regional Director of the status of the plant including any damage that has occurred and potential impact to business operations. Appropriate actions shall be identified and carried out including needed resources to send to the plant.
- 8.2.14. Plant Manager or designee shall begin collecting data for an investigation while the incident is fresh. This may require the witnesses to write a statement or taking photographs.
- 8.2.15. Carry out actions of other emergency procedures as applicable.
- 8.2.16. Limit access to the affected area until it is known to be safe. Mark the restricted area with barrier tape or by other means.
- 8.2.17. Log this event.

8.3. **Fire or Explosion in a Substation and/or Transformer:**

- 8.3.1. Evacuate the area, position yourself a safe distance from the fire and limit access to the area.
- 8.3.2. If individuals have been injured, seek appropriate medical attention for the victim(s).
- 8.3.3. Notify the Plant Manager or designee.
- 8.3.4. Plant Manager or designee – Initiate **Emergency Response Procedure** above. Emergency services will fight the fire.
- 8.3.5. Plant Manager or designee – Initiate **Plant Evacuation** above, if needed.
- 8.3.6. Plant Manager or designee – Notify the NCC of a fire at the Groton Wind Plant, location of fire, whether or not there are any injured personnel, whether or not the plant has been evacuated, which emergency services have been notified, and plant status.
- 8.3.7. The National Control Center (NCC) shall make the following notifications sharing the information they received from the Plant Manager:
 - a. NCC shall attempt to notify the Regional Director of the Groton Wind Plant and inform him or her of the fire and if applicable, the plant evacuation, the status of injured personnel and emergency services. The Regional Director shall make additional internal notifications as appropriate.
 - b. If the Regional Director is unable to be contacted, the NCC shall attempt to notify the Managing Director, Field Services that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation, the status of injured personnel and emergency services.
 - c. If the Managing Director, Field Services is unable to be contacted, the NCC shall attempt to notify the Vice President, Commercial Operations that the Groton Wind

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Plant has experienced a fire and if applicable, a plant evacuation, the status of injured personnel and emergency services.

- d. If the Vice President, Commercial Operations is unable to be contacted, the NCC shall attempt to notify the EHS Director that the Groton Wind Plant has experienced a fire and if applicable, a plant evacuation, the status of injured personnel and emergency services.
- 8.3.8. When emergency services arrive, recommend to them that there are significant hazards associated with spraying water on equipment which may be energized with high voltage. The electrical equipment should be de-energized with physical (visual) disconnect(s) open and Lockout/Tagout applied prior to spraying it with water.
- a. Fire Department officials may want to sign onto the Lockout/Tagout to ensure safety of their personnel. This is acceptable and should be encouraged.

Note: It is not uncommon for the media or others to listen to emergency services scanners, so it is likely that the media may show up to the plant and ask questions about the fire or for phone calls to be received regarding the event.

- 8.3.9. Plant Manager or designee shall not answer any questions from the media regarding the fire. Inform the media that our company policy is that all media inquiries must be answered by the Communications Department. Provide them with the Communications Director phone number or take the media's contact information and inform them that a person from the Communications Department contact them. The statement below is to be used with media and others not in the reporting chain of command.

“We had had an event at the Groton Wind Plant. We are investigating the situation and we will not be making any further comment until verified information becomes available. In the meantime we are focusing our efforts on the safety of our employees and the public”.

- 8.3.10. Once the fire is out and the situation is under control and stabilized, the Plant Manager or designee shall notify the Regional Director of the status of the plant including any damage that has occurred and potential impact to business operations. Appropriate actions shall be identified and carried out including needed resources to send to the plant.
- 8.3.11. Plant Manager or designee shall begin collecting data for an investigation while the incident is fresh. This may require the witnesses to write a statement or taking photographs.
- 8.3.12. Carry out actions of other emergency procedures as applicable.
- 8.3.13. Limit access to the affected area until it is known to be safe. Mark the restricted area with barrier tape or by other means.
- 8.3.14. Log this event.

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9. TEMPERATURE EXTREMES

9.1. Extreme Heat and Heat Affected Illnesses:

- 9.1.1. During extreme hot weather, ensure employees carry out the following actions:
- Increase fluid intake, regardless of their activity level. Don't wait until you're thirsty to drink. During heavy work activities in a hot environment, drink 16-32 ounces of cool fluid each hour.
 - Don't drink liquids that contain carbonation or large amounts of sugar—these may cause you to lose more body fluid. A sports beverage can replace the salt and minerals you lose in sweat.
 - Avoid very cold drinks; these can result in stomach cramps.
 - Take multiple water breaks during the day; ensure employees are hydrating during these breaks.
 - If necessary, adjust work schedules to avoid activity during the hottest part of the day.
 - Closely monitor the condition of employees and coworkers for signs of heat related illness such as heat rash, heat cramps, heat exhaustion and heat stroke.

***Note:** The symptoms of heat rash range from superficial blisters to deep, red lumps. Some forms of heat rash can be intensely itchy or prickly feeling. Heat rash may develop when your sweat ducts become blocked and perspiration is trapped under the skin.*

- 9.1.2. If a person shows signs of heat rash, perform the following:
- Cool the persons skin to prevent sweating.
 - Seek medical attention if symptoms are severe.

***Note:** The symptoms of heat cramps are involuntary muscle spasms that may occur during heavy exertion in hot environments. Heat cramps may develop as a result of inadequate fluid intake.*

- 9.1.3. If a person shows signs of heat cramps, perform the following:
- Have the person rest and cool down.
 - Have the person drink clear juice or an electrolyte-containing sports drink.
 - Practice gentle, range-of-motion stretching and gentle massage of the affected muscle group.
 - Do not resuming strenuous activities until several hours have passed after cramps have gone away.
 - Seek medical attention if symptoms don't go away after one hour.

***Note:** Heat exhaustion is a dangerous condition that may lead to heat stroke if not treated. The symptoms of heat exhaustion include feeling faint or dizzy, nausea, heavy sweating and a rapid weak heartbeat, low blood pressure, cool moist pale skin, and is the result of your body*

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overheating. Heat exhaustion results from exposure to high temperatures, particularly when combined with high humidity and strenuous activity.

- 9.1.4. If an employee shows signs of heat exhaustion, immediately perform the following:
- Move the person out of the sun and into a shady or air-conditioned location.
 - Lay the person down and elevate the legs and feet slightly.
 - Loosen or remove the person's clothing.
 - Have the person drink cool water.
 - Cool the person by spraying or sponging with cool water and fanning.
 - Seek medical attention if symptoms do not get better quickly or worsen.

Note: Heat stroke is a life threatening heat affected illness. The main symptom of heat stroke is a markedly elevated body temperature, generally greater than 104 F, with changes in mental status ranging from personality changes to confusion and coma. Skin may be hot and dry. Other symptoms include rapid heartbeat, rapid and shallow breathing, elevated or lowered blood pressure, cessation of sweating, irritability, confusion, unconsciousness, feeling dizzy or light-headed, nausea, fainting.

- 9.1.5. If an employee shows signs of heat stroke, immediately perform the following:
- Call 911 and request emergency services.
 - Move the person out of the sun and into a shady or air-conditioned space.
 - While waiting for emergency services to arrive, cool the person by covering them with damp sheets or by spraying with cool water. Direct air onto the person with a fan or other device.
 - If conscious, have the person drink cool water.

9.2. **Snow and Winter Weather:**

- 9.2.1. Actions to take when traveling during the winter season:
- Listen to the forecasts before departing and postpone travel if inclement weather is occurring or expected.
 - Avoid traveling alone.
 - Inform others of your timetable and planned routes.
 - Keep your gas tank near full.
 - Adjust your speed to the conditions and increase following distances. Bridges and overpasses can be more slippery than other parts of the road.
 - Carry a cell phone with you to call for assistance if needed.
 - Carry traction devices in your vehicle.
 - Carry a winter survival kit in your vehicle at all times.
 - Carry winter gear such as boots, clothes, hat, gloves, jacket and a blanket in your vehicle
- 9.2.2. If stranded while in your vehicle:
- Stay inside your vehicle and call for help.
 - Make yourself visible to rescuers by turning on lights at night when running the engine. Also tie a red or other bright colored cloth to the antenna or door.

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- c. Run the motor for ten minutes every hour, but open the windows slightly to allow for proper ventilation. Make sure the exhaust pipe is free of snow to prevent the buildup of carbon monoxide.
 - d. Exercise from time to time to keep the blood circulating and to keep warm.
- 9.2.3. If outside:
- a. Attempt to find shelter to stay dry.
 - b. Cover all exposed parts of the body.
 - c. If no shelter is nearby, prepare a wind break or snow cave for protection.
 - d. If possible, build a fire for heat if stranded.
 - e. Do not eat snow as it will lower your body temperature.
- 9.2.4. If working in a turbine:
- a. Closely monitor conditions and if they become too cold, cease work and return to a warm area.
 - b. Wear appropriate cold weather gear.
 - c. Take frequent warming breaks.
 - d. Minimize cold exposure to skin/extremities.
 - e. Attempt to stay sheltered and dry.

9.3. **Icing on WTG Blades or External Equipment**

***Note:** Ice that has formed on a wind turbine typically sheds as the air temperatures rises; however, cases have been documented when ice shedding occurred without a temperature rise. Shedding ice may be thrown a significant distance as a result of the rotor spinning or wind blowing the ice fragments. Shedding of ice from turbine blades or other structures poses a risk of injury or property damage. Everyone is reminded that at any time when “icing” may potentially occur there is no replacement for using constant vigilance in assessing your surroundings.*

- 9.3.1. If at any time you feel that conditions are not safe, immediately move to a safe location and notify your plant manager of the hazards.
- 9.3.2. In cold conditions in which the weather is favorable for ice forming, an initial inspection of the wind turbine generator (WTG) towers shall be performed before crossing the WTG Safety Setback Perimeter which is 524 feet for the turbines at Groton Wind Plant.
- 9.3.3. Any time conditions exist such that icing could occur, perform the following:
 - a. Never cross the Safety Setback Perimeter (524 feet) of the turbine that is actively shedding ice, or if conditions are such that ice may begin to shed.
 - b. Minimize time spent in any area where ice has built up and may fall or be thrown. This includes WTGs, met towers or other structures.
 - c. Prior to approaching within the WTG Safety Setback Perimeter of any turbine that you suspect has ice buildup (including driving past) the turbine must be shut down remotely and remain shut down until everyone is outside of the Safety Setback Perimeter.
 - d. If possible approach the WTG from the upwind direction.
 - e. Assess wind direction and yaw position, and then enter the turbine from a safe direction. If possible, yaw the turbine remotely to provide for a safer entry.
 - f. If leaving a WTG that has had ice build-up, the WTG shall remain shut down until you are outside of the Safety Setback Perimeter, then start it remotely.
 - g. Be aware of changes in the ambient temperature; as temperatures change, ice may “shed.”

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- h. In the event there is ice buildup on the nacelle and/or nosecone, access to the nacelle roof and the nosecone are prohibited. The basis for this is twofold: to avoid an overload condition of the nosecone as well as avoiding a fall hazard for those turbines in which you must exit via the roof of the nacelle to enter the nosecone.
- i. If the WTG starts “shedding” ice while you are inside, stay in the tower until it is safe to exit.

9.4. **High Winds:**

9.4.1. The following wind limits are associated with the Groton Wind Plant turbines:

No Climbing	No Hub Access	No Roof Access	Exit the Turbine
20 meters/second	12 meters/second	15 meters/second	20 meters/second

9.4.2. High winds may be an indication of approaching severe weather; obtain updated weather forecasts often.

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10. OIL/CHEMICAL SPILL

- 10.1. If safe to do so, stop the spill. If the spill cannot be immediately stopped, contain the spill.
- 10.2. Notify others of the spill including the Plant Manager or designee.
- 10.3. Initiate **Emergency Response Procedure** above if necessary.
- 10.4. Refer to Safety Data Sheet/Material Safety Data Sheet (SDS/MSDS) for specific cleanup response and Personal Protective Equipment (PPE) to be used.
- 10.5. Refer to the Groton Wind Plant SPCC.
- 10.6. Clean up the spill. This may require the use of specialized contractors.
- 10.7. Plant Manager or designee shall determine the following and report to the EHS Department:
 - 10.7.1. Amount of oil or chemical that was lost from the system.
 - 10.7.2. Estimated amount of oil or chemical that reached the ground.
 - 10.7.3. Estimated amount of oil or chemical that reached water.
 - 10.7.4. Reportable Quantity as indicated in Groton Wind Plant Spill Prevention Control and Countermeasure (SPCC) plan.
- 10.8. The EHS Department is responsible for reporting spills to the Federal, State and local agencies.
 - 10.8.1. Refer to the SPCC to determine which agency(s) receive notification, inform the EHS Department so they can then notify the appropriate agency(s).
 - 10.8.2. If EHS Department reports a spill to an outside agency, EHS shall inform the Regional Director and the EHSS Director.
 - 10.8.3. If EHS Department reports a spill to an outside agency in which the spill reached navigable waters, the EHS Department shall inform the Regional Director and the EHSS Director, **and** the Regional Director shall notify the Legal and Corporate Communications Departments.
- 10.9. Plant Manager or designee shall fill out the SPCC Spill Report Form and attach it to the Gensuite report.
- 10.10. Plant Manager or designee shall begin collecting data for an investigation while the incident is fresh. This may require the witnesses to write statements or taking photographs.
- 10.11. Do not allow access to the affected area until it is safe. Mark the restricted area with barrier tape or by other means.
- 10.12. Log this event.
- 10.13. Take inventory of and restock spill kits.

11. TRAINING REQUIREMENTS

- 11.1. Employees at the Groton Wind Plant shall receive training on this plan annually.

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11.2. Employees at the Groton Wind Plant shall conduct a minimum of one drill per calendar year to test emergency response procedures.

11.3. Employees at Groton Wind Plant shall receive training on the use of fire extinguishers annually.

11.4. Employees at Groton Wind Plant shall conduct training with local emergency personnel twice a year, *i.e.*, once in summer and once in winter.

12. RECORDKEEPING REQUIREMENTS

12.1. Training records shall be kept for the duration of the employee's employment.

12.2. Drill critiques and/or lessons learned from drills or actual events should be shared with the appropriate stakeholders.

13. CONSEQUENCES OF DEVIATION

13.1. Consequences will result from non-compliance with procedural standards, the severity of which will be determined by the applicable departmental manager.

14. DEFINITIONS

ANSI	American National Standards Institute
EHS	Environmental, Health and Safety
IR	Iberdrola Renewables
SPCC	Spill Prevention Control and Countermeasures Plan
WTG	Wind Turbine Generator

15. APPLICABLE DOCUMENTS

ANSI Z-308.1-2009 for contents of a basic first aid kit
Groton Wind Plant Spill Prevention Control and Countermeasures Plan (SPCC)

16. REVISION HISTORY

Rev #	Description	Date
Original	Original issue of document	04/11/14

17. APPENDICES

Name	Number
N/A	N/A

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