

Exhibit U

Preliminary Emergency and Fire Response Plan

Nottingham Solar LLC

Preliminary Emergency & Fire Response Plan

Athens Township, OH

July 2021

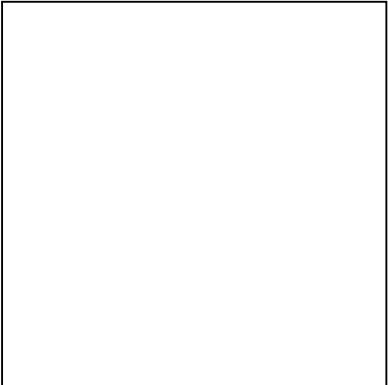
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Report History

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I. Executive Summary

Nottingham Solar LLC (the “Applicant”) is proposing to construct a photovoltaic (PV) solar energy facility (the “Facility”) in Athens Township, Harrison County, Ohio. Crawford & Associates Engineering & Land Surveying, P.C. (C&A) was retained to develop a Preliminary Emergency & Fire Response Plan (the “E&FRP”) for the proposed Facility.

The information included in this Plan will be finalized in conjunction with local emergency service providers and standard industry practices. The Plan will be managed and enforced by the Applicant’s Emergency Coordinator (EC), who will be an employee(s) or contractor(s) of the Applicant tasked with dissemination and implementation of this Plan. Temporary on-site ECs may also be designated as needed to implement this Plan. The Plan will also be made available to all employees, visitors and/or contractors at the Facility.

In addition to identifying contingencies that would constitute an emergency at the Facility, this E&FRP also includes emergency evacuation measures by contingency, evacuation control measures by contingency, and community control measures by contingency along with pertinent contacts and contact information for further information or an explanation of duties for emergency action purposes, and training guidelines established to help support safety during an emergency.

As identified below, contingencies that would constitute an emergency include medical emergencies, fire, earthquake, severe weather conditions, hazardous material spills, crime or violent behavior or disturbance, bomb or shooting threats, and on-site vehicular accidents.

II. Emergency Response and Reporting Procedures

All emergencies should be reported to the EC. Types of emergencies to be reported by site personnel are:

- Medical Emergency
- Pandemic
- Fire Emergency
- Severe Weather and Natural Disaster
- Hazardous Material Spill
- Natural Gas Pipeline Damage
- Crime, Violent Behavior, or Civil Disturbance
- Bomb/shooting Threat and Suspicious Packages
- On-site vehicular accidents

A. Medical Emergency

Employees, subcontractors, and visitors on the Facility Site may all come with pre-existing conditions, and medical emergencies of any kind could happen while on site, such as heart attack, stroke, diabetic shock, and more. The Facility is an electrical power generation facility located outdoors, and so employees should be particularly prepared to recognize and respond to related medical emergencies, such as electrocution, burns, heat stroke, hypothermia, allergic reaction, etc.

All medical incidents or injuries, whether emergency or not, should be reported to the EC. If the medical emergency is contagious, or has the potential to affect the public, it is the responsibility of emergency medical personnel to notify the appropriate public authorities. The EC and all Facility personnel may not share medical information which is protected by the Health Insurance Portability and Accountability Act (HIPAA) privacy provisions.

If a medical emergency requires immediate assistance, stay calm and call 911. Be prepared to provide the following information:

- Nature of the medical emergency
- Location of the emergency
- The name and phone number of the person calling

Do not hang up unless the 911 operator tells you to hang up. If you lose connection, attempt to call 911 back. Emergency system dispatchers can guide you through the steps of performing CPR, using an AED, or delivering basic care until additional help arrives. Follow the instructions of the 911 operator. Always be aware of your surroundings, and never put yourself at risk to assist other victims.

In case of exposure to hazardous materials, obtain the Safety Data Sheet (SDS) to provide to emergency first responders. Attempt first aid **ONLY** if trained and wearing appropriate personal protective equipment (PPE).

In the event of electrocution, look to see if the victim is still in contact with the electrical source. If so, **DO NOT TOUCH THE VICTIM**. Disconnect the electricity source, if possible. Alternatively, separate the victim from the electricity source; you may need to stand on dry insulating material (such as a plastic mat or wooden box) and use a dry insulated device (such as a wooden pole) to move the source or victim.

The closest emergency rooms are listed at the end of this Plan.

B. Pandemic

In the event of a pandemic or local infectious disease outbreak, construction and operation activities may be limited to protect the health and safety of all personnel. The EC shall review all recommendations and/or requirements issued by state and local governments to develop and implement a temporary Infectious Disease Outbreak Response Plan (IDORP) specific to the nature of the infectious disease. The EC shall also ensure that PPE in compliance with the IDORP is available for all per-

sonnel on-site. No visitor, employee, or subcontractor may enter the Facility Site without a brief training on the IDORP, if an IDORP is active. The EC shall also be responsible for updating the IDORP as new information becomes available, and terminating the IDORP once the infectious disease outbreak has passed.

C. Fire Emergency

The Facility Site is bordered by a railway to the east, and sparks coming from those rail cars has been known to ignite brush fires. In OH, springtime is the season with the highest risk for brush fires. Electrical equipment, such as PV modules, collection lines, and transformers pose unique wildland fire suppression hazards, so it is important to get emergency help immediately if an uncontrolled burn is discovered.

If a fire is discovered:

- Notify the local Fire Department by calling 911
- Notify other site personnel about the fire emergency by voice, radio, phone, etc.
- Notify the EC

Fight the fire ONLY if:

- The Fire Department has been or is being notified
- The fire is small and is not spreading to other areas
- You have a reliable escape path
- You have an appropriate fire extinguisher and are trained on its use
 - Class A fire extinguishers, or water, can be applied to combustible materials, like grass, paper, wood, and plastics.
 - Class B fire extinguishers can be applied to flammable liquids or gases, such as (un-electrified) oils, fuels, or lithium-ion electrolyte.
 - Class C fire extinguishers can be applied to electrical fires.
 - Class ABC fire extinguishers can be used on any of the above fuels.

Upon being notified about the fire emergency, occupants must:

- Leave the area using the designated escape routes.
- Unless working alone, assemble with other on-site personnel in a location which is upwind, and a safe distance from the fire. During some phases of construction, the EC may have designated assembly areas for evacuation purposes.

- Assist the EC the number of people expected on site, assembled, and potentially missing.
- Remain assembled until the EC determines that it is safe to resume Facility activities.

The EC must:

- Direct appropriately qualified individuals to disconnect utilities and equipment, as appropriate, unless doing so jeopardizes his/her safety.
- Call National Grid, if needed, to disconnect the POI Switchyard
- Coordinate an orderly evacuation of personnel.
- Perform an accurate head count of personnel reported to the designated area.
- Determine a rescue method to locate missing personnel.
- Provide the Fire Department personnel with the necessary information about the Facility, including neighbor and landowner contact information if needed by the local first responder Incident Commander.
- Notify environmental cleanup authorities as needed per the SPCC or if directed by the local first responder Incident Commander.

A Quick Reference for Firefighters has been provided in Appendix A. It is the responsibility of local first responders to notify and evacuate neighbors as deemed necessary.

D. Severe Weather and Natural Disasters

The Facility contains virtually no structures for shelter, except for construction trailers during construction, and a shed in the Facility Substation. Visitors to the Facility are exposed to the elements and vulnerable to severe weather and/or natural disaster scenarios. Routine maintenance should not be conducted if severe weather is forecasted, and construction should be postponed. However, if personnel experience severe weather while at the Facility, the following steps should be taken.

1. Thunder/Lightning Storms

- If signs of impending storm or lightning are observed, do not start any task you cannot quickly abandon
- If thunder or lightning is observed
 - Notify the EC. The EC shall determine when to stop work, in accordance with all OSHA requirements.
 - The EC shall ensure that all persons on site are notified
 - If directed by the EC
 - stop work and seek shelter in a structure or hard-topped metal vehicle with windows rolled up.

- Seek fully enclosed, substantial buildings with wiring and plumbing. In modern buildings, the interior wiring and plumbing will act as an earth ground. A building is a safe shelter as long as you are not in contact with anything that can conduct electricity (e.g., electrical equipment or cords, plumbing fixtures, corded phones). Do not lean against concrete walls or floors (which may have metal bars inside).
- Do not shelter in sheds, pavilions, tents, or covered porches as they do not provide adequate protection from lightning.
- Remain in the vehicle/structure for at least 30 minutes after the last sound of thunder.
- If no shelter is available:
 - Lightning is likely to strike the tallest objects in a given area—you should not be the tallest object.
 - Avoid isolated tall trees, hilltops, utility poles, cell phone towers, cranes, large equipment, ladders, scaffolding, or rooftops.
 - Avoid open areas, such as fields. Never lie flat on the ground.
 - Retreat to dense areas of smaller trees that are surrounded by larger trees, or retreat to low lying areas (e.g., valleys ditches) but watch for flooding.
 - Avoid water, and immediately get out of and away from bodies of water (e.g., pools, lakes).
 - Avoid wiring, plumbing, and fencing. Lightning can travel long distances through metal, which is an excellent conductor of electricity. Stay away from all metal objects, equipment, and surfaces that can conduct electricity.
 - Evacuate if instructed by the EC

2. Tornado

- Know the signs of a tornado. Some things to look and listen for include:
 - Strong, persistent rotation in the cloud base.
 - Whirling dust or debris on the ground under a cloud base -- tornadoes sometimes have no funnel!
 - Hail or heavy rain followed by either dead calm or a fast, intense wind shift. Many tornadoes are wrapped in heavy precipitation and can't be seen.
 - Day or night: Loud, continuous roar or rumble, which doesn't fade in a few seconds like thunder.
 - Night: Small, bright, blue-green to white flashes at ground level near a thunder-

storm (as opposed to silvery lightning up in the clouds). These mean power lines are being snapped by very strong wind, maybe a tornado.

- Night - Persistent lowering from the cloud base, illuminated or silhouetted by lightning -- especially if it is on the ground or there is a blue-green-white power flash underneath.
- When a warning is issued by sirens or other means (radio/emergency broadcast system), seek shelter in a sturdy building (on foot), if possible. Do not attempt to drive a vehicle. If no shelter is nearby, lie flat and face-down on low ground, protecting the back of your head with your arms. Get as far away from trees, cars, and other structures as you can; they may be blown onto you in a tornado.
- Evacuate as instructed by the EC

3. Earthquake

- If in a moving vehicle, stop driving and stay in the vehicle. Avoid stopping near or under buildings, trees, overpasses, or utility wires.
- If outdoors, move away from structures and utility wires. Once in the open, stay there until the shaking stops.
- Evacuate as instructed by the EC

4. Flood

- Climb to high ground and stay there.
- Avoid walking or driving through flood water.
- If car stalls, abandon it immediately and climb to higher ground
- Evacuate as instructed by the EC

5. Hurricane

The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane watch is issued when a hurricane becomes a threat to a particular area. A hurricane warning is issued when hurricane winds of 74 mph or higher are expected in the area within 24 hours.

- If a hurricane watch has been issued:
 - Stay calm and await instructions from the EC
 - Secure loose equipment, if possible and safe to do so
 - Continue to monitor local TV and radio stations for instructions
 - Stay away from low-lying areas/riverbanks

- If a hurricane warning has been issued:
 - Be ready to evacuate as directed by the EC
 - Leave areas that might be affected by storm tide or stream flooding
 - Seek shelter inside a secure structure

6. Blizzard

All employees and contractors should have multiple warm layers and appropriate outer shells available when working in winter conditions. If stuck at the Facility during a blizzard, stay calm and await instructions from the EC. The EC will arrange for a plow to assist in Facility operations.

- If outdoors:
 - Find a dry shelter. Cover all exposed parts of the body.
 - If shelter is not available:
 - Prepare a lean-to, wind break, or snow cave for protection from the wind.
 - Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
 - Do not eat snow. It will lower your body temperature (melt it first).
- If stranded in a car or truck:
 - Stay in the vehicle!
 - Run the motor about ten minutes each hour. Make sure the exhaust pipe is not blocked to avoid carbon monoxide poisoning.
 - Exercise if possible (repetitiously), to keep blood circulating and to keep warm.

7. Ice Storm

Ice storms are highly likely in Greene County. Follow all blizzard precautions above, but take particular care when driving to, from, and within the Facility due to potentially slick conditions.

E. Hazardous Material Spill

If there is a derailment or spill, evacuate the area immediately, and call 911 for further instructions.

If the hazardous material spill occurs from Facility-related construction or operations:

- Refer to the Facility's Spill Prevention, Control & Countermeasure (SPCC) Plan
- Locate the SDS for the spilled material and follow emergency response instructions.
- If recommended by the SPCC Plan or SDS, call 911. Be prepared to provide the SDS to first responders, and then notify the EC and follow instructions.

- If the SPCC Plan or SDS do not require immediate emergency notification to protect life, health, or property, notify the EC and follow instructions. The EC will determine whether the spill must be reported to federal, state and/or local authorities.

F. Natural Gas Pipeline Damage

If a natural gas pipeline is damaged during construction, or if a protective coating is scratched, the utility operator of that natural gas line should be contacted immediately. The individual identifying the problem will contact the EC, who will reach out to the utility operator as follows:

Contact Info: TBD

A natural gas pipeline leak can be detected by sight, smell, and sound. Although natural gas is naturally colorless and odorless, a distinctive, pungent odor is usually added so you will recognize it quickly. You may also see a white cloud, mist, fog, bubbles in standing water, or vegetation that appears to be dead or dying for no apparent reason. You may hear an unusual noise like roaring, hissing, or whistling. If a leak is suspected, follow these steps:

- Immediately isolate people from the leak area for at least 330 ft in all directions. For a large leak, consider initial evacuation of downwind persons for at least ½ mile.
- Natural gas is extremely flammable, ELIMINATE all sources of heat, sparks, or flames from the vicinity. Do not attempt to extinguish fire. DO NOT strike a match, use telephones, operate engines and motors, switch lights or appliances on or off, or even turn on a flashlight in the area where you smell gas. These items can produce sparks that might ignite the gas and cause an explosion.
- Call 911, and then notify the EC
- Do NOT attempt to fix the leak

For personnel who have been exposed to natural gas:

- Vapors can cause dizziness or asphyxiation without warning. Stay upwind, uphill, and/or upstream of the leak. Give artificial respiration if victim is not breathing. Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- In case of contact with liquefied gas, thaw frosted parts with lukewarm water. Clothing frozen to the skin should be thawed before removing.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.

G. Crime, Violent Behavior, or Civil Disturbance

If confronted by criminal behavior, unrest, or active shooter avoid the perpetrator(s). Remain calm, notify the EC, and follow instructions. If necessary, call 911 and be prepared to provide the following:

- The name of the group or individual, if known
- The exact location
- The size of the group
- Weapons involved
- What the group/individual is doing

In the event of an active shooter, the following actions should be followed

- Evacuate regardless of whether others agree to follow
- Leave your belongings behind
- Help others escape, if possible
- Prevent others from entering the area where the shooter might be
- Keep your hands visible
- Follow the instructions of any police officers
- Do not attempt to move wounded people
- Call 911 when you are safe

H. Bomb/Shooting Threat or Suspicious Packages

All bomb or shooting threats are to be treated seriously and considered real until proven otherwise. Do not use two-way radios or cellular phones to communicate; radio signals have the potential to detonate a bomb. Clear the area and call 911 using a land line if possible.

Most bomb threats are received by phone. If a bomb threat is received by phone:

- Remain calm. Keep the caller on the line for as long as possible. DO NOT HANG UP, even if the caller does.
- Listen carefully. Be polite and show interest.
- Try to keep the caller talking to learn more information.
- If possible, write a note to a colleague to call 911, or as soon as the caller hangs up, immediately notify 911 using a different phone.
- If your phone has a display, copy the number and/or letters on the window display.

- Complete the Bomb Threat Checklist (outlined below) immediately. Write down as much detail as you can remember. Try to get exact words.
- Notify the EC and await instructions.

1. Bomb Threat Checklist

- Date
- Time call received, and time caller hung up
- Phone number where call received.
- Ask Caller:
 - Where is the bomb located?
 - When will it go off?
 - What does it look like?
 - What kind of bomb is it?
 - What will make it explode?
 - Did you place the bomb?
 - Why?
 - What is your name?
- Write down exact words of threat
- Write down where the caller might be located based on background noise
- What is the caller's estimated age or gender?
- Is the voice familiar? If so, who does it sound like?

If a suspicious package is received, do not open it. Signs of a suspicious package include:

No return address

- Excessive postage
- Stains
- Strange odor
- Strange sounds
- Unexpected delivery
- Poorly handwritten
- Misspelled words

- Incorrect titles
- Foreign postage
- Restrictive notes

I. On Site Vehicular Accident

Vehicular accidents may occur between construction or operations equipment, personal vehicles, Facility structures, and personnel. Accidents should be prevented by use of spotters to assist in backing up vehicles, honking when approaching blind turns or backing up, obeying speed limits within the Facility, and by not multi-tasking while operating a vehicle on-site. If a vehicular accident occurs on-site:

- If any person is trapped or requiring immediate medical assistance, call 911 and arrange for someone to assist first responders in finding the emergency.
- If a chemical spill has occurred as a result of the accident, follow the procedures in the Spill Prevention, Control and Countermeasure (SPCC) Plan, (see Appendix 23-B).
- If electrical equipment is damaged, do not touch the equipment or any metal parts that may be in contact with damaged electrical equipment, without appropriate electrical PPE. Avoid standing in puddles or wet ground in the vicinity of the accident.
- If electrical equipment or structural members have been damaged, after all parts have been safely de-energized, flag the equipment for further inspection by qualified personnel.
- Notify the EC of all incidents, even for small accidents.

III. Critical Operations

During some emergency evacuations, it may be necessary for some specially assigned personnel to remain at the work areas to perform critical operations. Personnel involved in critical operations may remain on the site upon the dismissal of the EC.

IV. Emergency Response Equipment

The EC shall be responsible for providing and maintaining the following emergency response equipment during construction and operations in accordance with all OSHA requirements:

- Automated External Defibrillator (AED)
- CPR Mask
- First aid kits with appropriate PPE, such as gloves, face mask,
- ABC rated Fire Extinguishers

The EC shall also be responsible for establishing a site accountability system at the Facility Site. The accountability system will identify the presence of personnel within each PV array, and will be posted at each PV array's gated entrance to inform first responders. During construction periods when many

workers are on site, the gated signs may provide contact information for the acting on-site EC, who will be responsible for accounting for all workers and visitors and communicating with first responders. During operations, the accountability system may consist of a sign-in, tag board, or other similar system posted at the entrance to each PV array.

V. Emergency Contact List

A. Site Owners EC

Phone: TBD

E-mail: TBD

B. Emergency Phone Numbers

FIRE DEPARTMENT: Dial 911

AMBULANCE: Dial 911

POLICE: Dial 911

C. Non-Emergency Phone Numbers

FIRE DEPARTMENT

New Athens 740-397-0740

AMBULANCE

Athens Township TBD

POLICE

Harrison County Sheriff TBD

OH State Police – Athens Township TBD

D. Utilities - Emergency Contacts

Ohio Utilities Protection Service 800-362-2764

ELECTRIC:

TBD

WATER:

Athens Township TBD

SEWER:

Athens Township TBD

NATURAL GAS:

TBD

TBD

COMMUNICATIONS

Verizon/Fios 800-837-4966

E. Hospital Locations

Harrison Community Hospital

951 East Market Street

Cadiz, OH 43907

8.6 mi 17min

Trinity Hospital Twin City

204 East 3rd Street

Uhrichsville, OH 44683

32.5 mi 44min

F. Landowners & Neighbors

The Final E&FRP will include a list of emergency contact information for landowners and neighbors of the Facility. The EC shall offer this list to first responders as needed for notification purposes.

Appendix A: Firefighter Quick Reference

Appendix A:

Firefighter Quick Reference

Initial Size-up

- Who is at risk? Does the accountability board indicate maintenance personnel may be inside?
- What is on fire? Is it electrical equipment, and is it possible to confirm it's de-energized?
 - Firefighter PPE is not electrical PPE, maintain separation from energized equipment, and avoid standing in pooling water
- What is adjacent to the fire? Could it be energized? Outdoor rated electrical enclosures can be penetrated by hose streams.
- Where is the fire? In which direction is wind blowing?
- When is the response? Is there sunlight out?
- How large is the fire?
- What is the slope? Could water flow towards people or trucks?

Initial Risk Assessment

- *Risk a lot to save a lot*
It is rare for people to be inside the Facility. If empty, focus on containment and protecting exposures.
- *Risk a little to save a little*
Where life safety risk is low, attempt to contain fire to smaller area. Prioritize protecting exposure to neighboring structures, transformers, and batteries.
- *Risk nothing to save nothing*
The safety of first responders is paramount. No level of risk is acceptable where there is no potential to save lives or property.

Contact Information

- Facility Emergency Coordinator: _____
- AEP emergency technical support: TBD
- Landowners and Neighbors: *upon request, the Facility's Emergency Coordinator can provide first responders with current emergency contact information for emergency notification of landowners and neighbors*

Appendix A: Firefighter Quick Reference

*7/19/2021 Preliminary Draft. Emergency contacts & reference maps will be provided in the final version.

Equipment Type	How to de-energize	HazMat Reference	Recommended Fire Suppression Methods
All Electrical Equipment	<p style="text-align: center;">DANGER! ARC FLASH HAZARD Safe Approach Boundaries may be up to 15ft! Firefighter PPE is not Electrical PPE!</p>	N/A	<p>ABC fire extinguishers are preferred for small fires, though water can be used on energized equipment. Stand at least 30ft away and ensure no people or trucks are in path of pooled water. Deck nozzle or BlitzForce recommended to limit direct firefighter contact.</p> <p style="text-align: center;">DO NOT APPLY FOAM MINIMIZE USE OF STRAIGHT OR SMOOTH BORE STREAMS FOG SPRAY IS PREFERRED!</p>
Grass	N/A	N/A	<p style="text-align: center;">Contain brush fires with hand tools where feasible, such as shovels, rakes, leafblowers, etc. Establish fire breaks and segment sub-arrays to control spread and protect exposures.</p>
Transformers	Consult FMS technician on appropriate disconnect locations.	<p>1. ERG Guide 127 (or 128*) 2. MSDS on page _____*</p>	<p style="text-align: center;">Maintain appropriate setbacks as advised by ERG/MSDS. Once de-energized, encapsulating agent or class B foam may be used to suppress fire.</p>
PV Modules, DC Combiner Boxes, Inverters	<p style="text-align: center;">Some electrical equipment cannot be completely de-energized, consult FMS technician.</p>	N/A	<p style="text-align: center;">Water is the preferred method of fire suppression. At night, current and voltage are reduced, though water can be applied safely at all hours following guidance for suppression of electrical equipment.</p>
Facility Substation	Consult FMS technician on appropriate disconnect locations	<p>1. ERG Guide 127 (or 128*)</p>	<p style="text-align: center;">Let it burn. Isolate the area at least 300ft in all directions. Be alert to the risk of transformer explosions, smoke hazards, and oil releases. Stay upwind and consider initial downwind evacuation for at least 1000ft. Monitor for oil runoff.</p>



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