



Walker Road Solar Farm

Exhibit A-1.9: Emergency Response Plan

Clinton County, Michigan

JANUARY 2026

PREPARED FOR

**Walker Road Solar Farm LLC, a Delaware
Limited Liability Company** 353 N Clark St., 30th
Floor
Chicago, IL 60654

PREPARED BY

SWCA Environmental Consultants
200 W 22nd St., Suite 220
Lombard, IL 60148

EMERGENCY RESPONSE PLAN FOR THE WALKER ROAD SOLAR PROJECT, CLINTON COUNTY, MICHIGAN

Prepared for

Walker Road Solar Farm LLC, a Delaware Limited Liability Company
353 North Clark Street
Suite 3000
Chicago, Illinois 60654

Prepared by

SWCA Environmental Consultants
200 W 22nd Street, Suite 220
Lombard, Illinois 60148
www.swca.com

SWCA Project No. 98268

January 2026

CONTENTS

1	Introduction.....	1
1.1	Local Consultation	1
1.2	Project Description, Location, and Access.....	1
1.3	Plan Review and Development	4
1.4	Training.....	4
1.4.1	Local Capacity Analysis.....	4
2	Contingency Emergency response plans.....	4
2.1	Electrical Hazards	4
2.2	Severe Weather Events	5
2.2.1	Wildfires.....	5
2.2.2	Flooding and Flash Flood.....	6
2.2.3	Tornado	6
2.2.4	Lightning Storm	6
2.2.5	Snowstorm.....	7
2.3	Physical Security Breaches	7
2.4	Cybersecurity Breaches.....	7
2.5	Mechanical Failures	8
2.6	Chemical Spills	8
2.7	Personnel Injuries and Serious Health Conditions.....	8
2.8	Capacity or Transmission Emergencies	9
2.9	Traffic Incidents	9
3	Evacuation procedures.....	9
3.1	Electrical Hazards	10
3.2	Severe Weather Events	10
3.3	Physical Security Breaches	10
3.4	Cybersecurity Breaches.....	10
3.5	Mechanical Failures	10
3.6	Chemical Spills	10
3.7	Personnel & Visitor Medical Emergencies	10
3.8	Capacity or Transmission Emergencies	11
3.9	Traffic Incidents	11
4	Contingency communication and community notification.....	14
4.1	Incident Reporting.....	15
4.2	Emergency Notification Procedures.....	15
4.3	Evacuation Communication Protocol.....	16
4.4	Post-Incident Public Communication.....	16
5	Emergency Response Procedures.....	16
5.1	Roles and Responsibilities	16
5.2	Project Owner/Management.....	16
5.3	Facility Manager	16
5.4	Remote Operation Center.....	17

5.5	Site Safety Officer.....	17
5.6	Supervisors.....	17
5.7	Employees/Contractors	18
5.8	Emergency/Incident Command.....	18
5.9	Contact Information	18

Figures

Figure 1.	Topography of the Walker Road Solar Farm Project.....	2
Figure 2.	Walker Road Solar Farm Project site location.....	3
Figure 3.	Fire and ambulance response access and route from Project site to Hospital.....	12
Figure 4.	Emergency Evacuation and Muster Area.....	13

Tables

Table 1:	Community Notification Procedures by Contingency	14
Table 2.	Primary On-Site Emergency Notification Contacts	18
Table 3.	Emergency-Related Contacts near the Project Area.....	18 ¹⁹

Attachments

Attachment 1: December 17, 2025Meeting Discussion (To be updated)

1 INTRODUCTION

This Emergency Response Plan (“ERP”) provides guidance to construction and field personnel on measures identified by Walker Road Solar Farm LLC, a Delaware Limited Liability Company (“Walker Road Solar”), to mitigate risks of hazards associated with the proposed Walker Road Solar Farm Project (“Project”) in Clinton County, Michigan. This ERP complies with requirements established under the Michigan Public Service Commission (“MPSC”) Public Act 233 (Public Act 233) and integrates standards from the Occupational Safety and Health Administration (“OSHA”), and relevant local fire safety and emergency codes.

1.1 Local Consultation

This plan will be further developed in coordination with emergency response providers, which consist of Clinton County Emergency Management, the Bingham and St. John’s Fire Departments, and the Clinton County Sheriff’s Office, in accordance with OSHA standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. It will be the responsibility of Walker Road Solar and its Project contractors to comply with the measures identified in this plan. Walker Road Solar will meet with the Clinton County EMS and Bingham Fire Department to discuss the Project and ERP on December 17, 2025. Walker Road Solar commits to reviewing and updating this ERP with local fire departments, first responders, and the County Emergency Manager at least once every three (3) years and after material design/equipment changes, with documented re-consultation. Additional details on coordination with County Emergency Services can be found in Attachment 1 once the meeting occurs.

Updates to the Project’s ERP may occur based on continued coordination between Walker Road Solar and local agencies.

1.2 Project Description, Location, and Access

The Walker Road Solar Farm Project (“Project”) is a proposed 150-megawatt (“MW”) alternating current (“AC”) solar photovoltaic power generating facility. The project would be in Clinton County, Michigan east of the city of St. Johns. The Project Boundary/Leased Parcels is approximately 1,577 acres of predominantly agricultural land (see Figure 2). Once built, the fenced-in portion of the Project would be approximately 751 acres. The Project would provide renewable energy to the electrical transmission grid. Major components of the project include photovoltaic solar arrays (the main project footprint), an on-site substation, switchyard, an operation and maintenance (“O&M”) area, transmission line, roads, and fences.

The Project area and adjacent properties primarily consist of agricultural or residential land. US-127 runs north to south through the center of the Project area (see Figure 2). State Route M-21 runs east to west through the center of the Project (see Figure 2).

Police, Fire, ambulance, and emergency vehicles will access the Project primarily via US-127 and M-21 (see Figure 2). The Project is expected to provide electric power to the existing electric transmission grid through a new interconnection to the existing transmission lines running east to west through the Project area, just south of E. Steel Road.

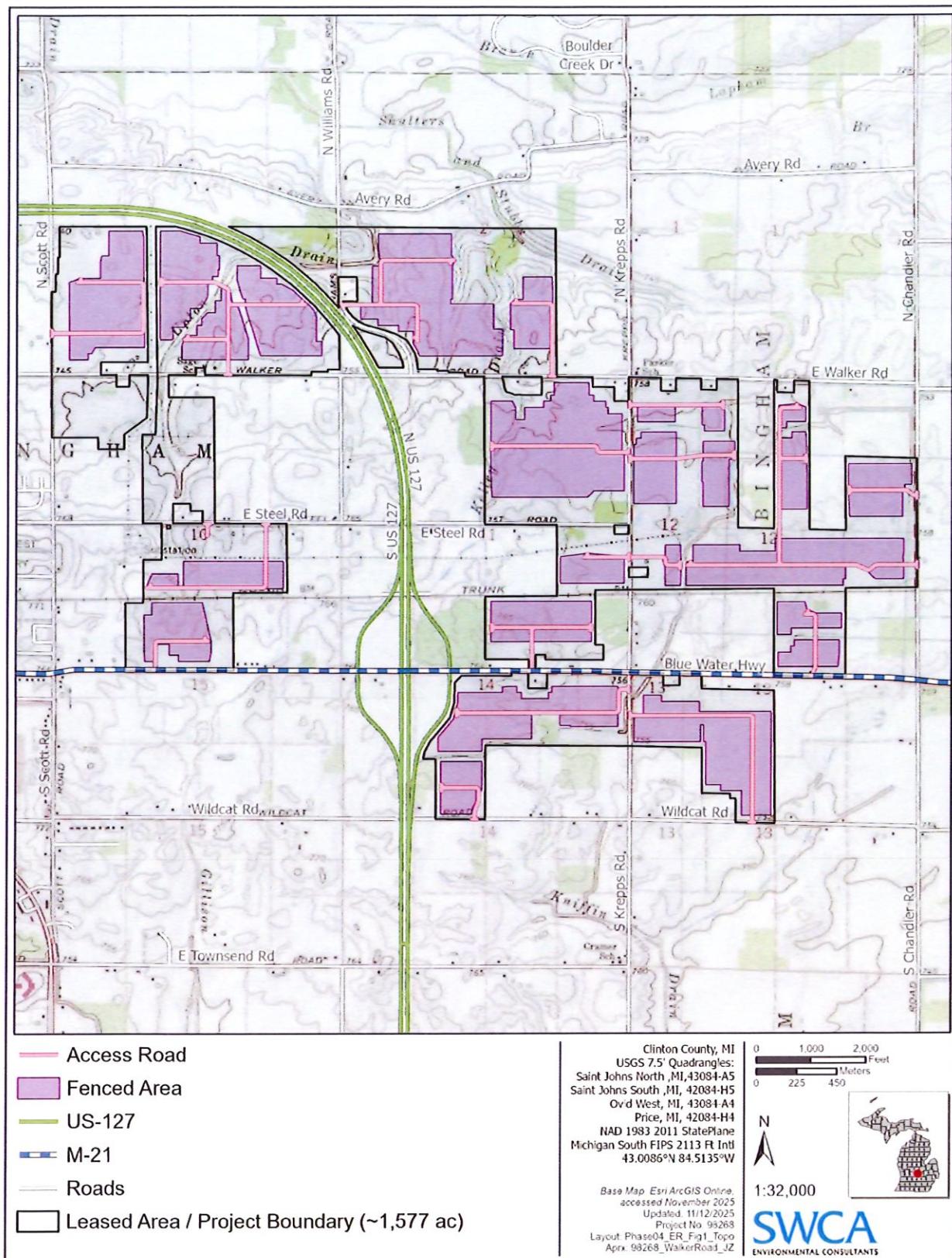


Figure 1. Topography of the Walker Road Solar Farm Project

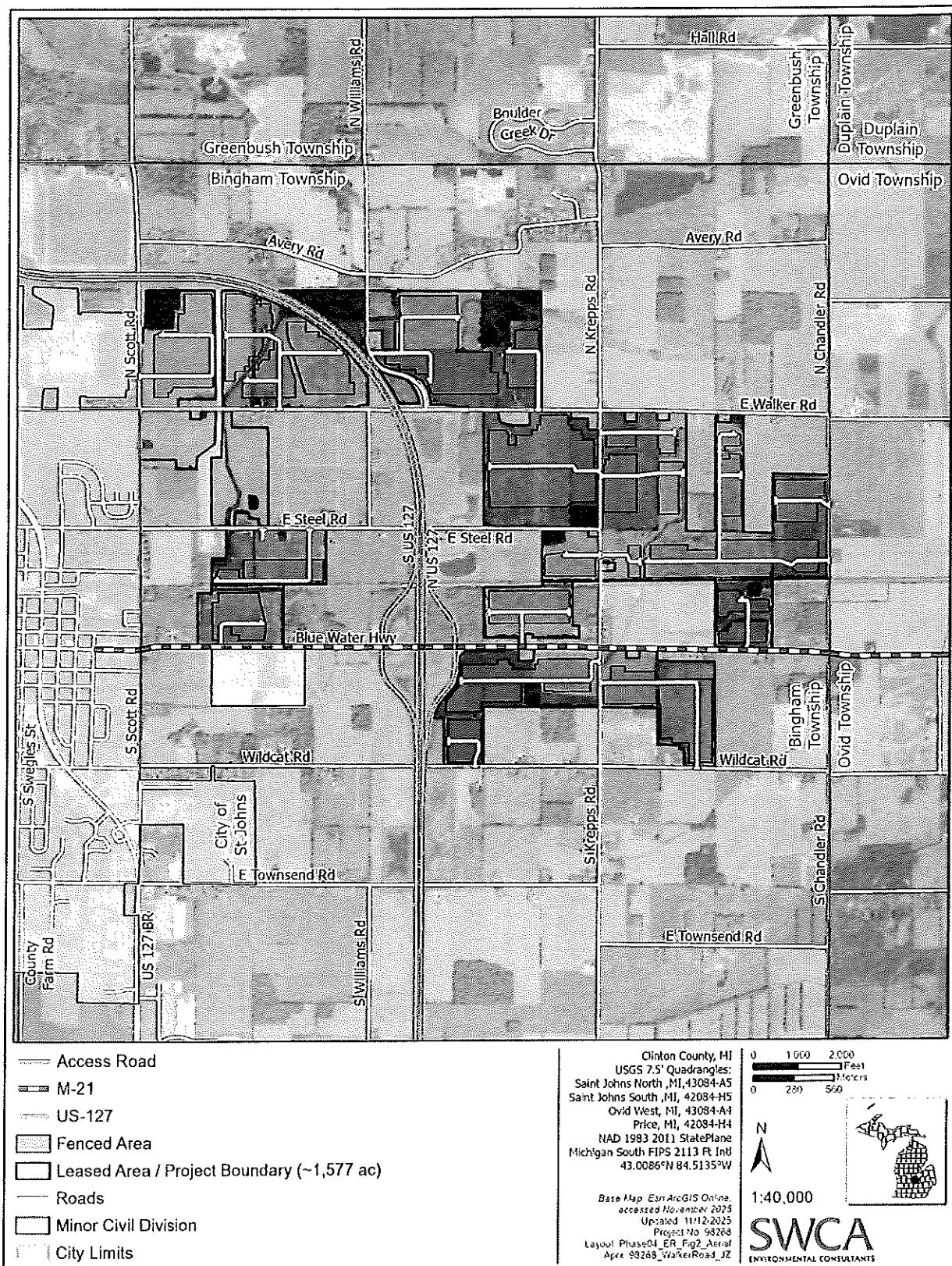


Figure 2. Walker Road Solar Farm Project site location.

1.3 Plan Review and Development

This ERP will be reviewed and amended if there is a change in facility design, construction, operation, or maintenance that affects emergency action planning. This ERP will be reviewed at least annually internally and at least once every three (3) years with local fire, EMS, and County Emergency Management; revised plans will be circulated to those agencies.

1.4 Training

Employees or contractors visiting the Project area will have access to and receive training on this ERP whenever it is modified or at least on an annual basis. Employees will also be trained when this ERP is initially implemented. Contractors and visitors who enter operating areas of the Project area will be trained on evacuation procedures before they enter for the first time and at least annually thereafter. Evacuation drills will be conducted by the Facility Manager at least twice a year. A list of contractors with current training on this ERP will be maintained at the construction trailer during construction and at the O&M building, once built, for reference purposes. Employees and contractors will be provided with and use the required personal protection equipment (PPE) based on the expected hazards of their work.

See Exhibit A-1.10 Fire Response Plan for site-specific training commitments (pre-operation and upon request) with local responders

1.4.1 Local Capacity Analysis

Walker Road Solar is not currently aware of either deficiencies in existing local emergency response capacity or deficiencies in specific equipment or training for local emergency response capacity. Walker Road Solar and the local emergency response team will meet prior to the Walker Road Solar Project going operational to review Bingham Fire Department equipment, Clinton EMS capabilities, and other services to identify potential gaps in capacity, training, equipment, and level of staff. If gaps are identified, Walker Road Solar will work with local emergency officials to find solutions and schedule any additional drills or training identified. Also, during this meeting, Walker Road Solar will provide points of contact, gate keys/codes, and finalized maps/layouts of the facility as part of this emergency response plan.

2 CONTINGENCY EMERGENCY RESPONSE PLANS

The following contingencies represent conditions that pose a potential safety, health, or security risk to personnel, visitors, or the surrounding community. These events require clear response protocols, trained staff, and strong coordination with local emergency services. The procedures below outline the actions to be taken to protect life, stabilize the incident, and secure the Walker Road Solar Farm facility.

2.1 Electrical Hazards

Access to locations containing energized electrical equipment will be restricted at all times. Warning signage compliant with the National Electric Code (“NEC”) will be posted to prevent unauthorized entry. In the event of an electrical hazard, only qualified electrical personnel will respond. These personnel will utilize appropriate PPE, including arc-rated clothing, insulated gloves, and voltage-rated tools.

If energized equipment becomes damaged or presents an imminent hazard, responders will isolate and de-energize the affected equipment following the facility’s lockout/tagout (“LOTO”) protocols. The area will be secured until the hazard is mitigated. Personnel within the immediate hazard area will evacuate to a

designated safe zone, with distancing requirements determined by the Site Manager based on equipment type and voltage class.

2.2 Severe Weather Events

During construction and operations, the EPC Contractor and O&M team will continuously monitor National Weather Service (“NWS”) alerts and local forecasting tools. When severe weather may affect the site, real-time notifications will be issued to personnel.

During periods of high fire danger, potential sources of fire ignition (e.g., vehicle exhaust systems, cigarettes, matches, propane torches, sparks from hot work operations, etc.) must be used with extra caution. During periods of thunderstorms, personnel will remain alert to heavy rainfall in the area. Notifications of flooding or flash floods will trigger suspension of field work, and personnel will be directed to predesignated shelters. High winds or tornado warnings will trigger suspension of elevated work and securing of loose materials. Lightning or thunderstorm activity will activate shelter-in-place protocols, with personnel directed to predesignated indoor shelters, including the O&M building. Snow, ice, or hail events will prompt cessation of field activities and inspection of access roads and equipment. Work will not resume until conditions are deemed safe by the Site Manager.

Following any severe weather event, facility equipment will be evaluated for damage by the SSO, and repairs will be performed under standard operational procedures.

2.2.1 Wildfires

Wildfires are uncontrolled fires that burn in wildland vegetation, often in rural areas. Wildfires can ignite from natural occurrences and human-generated sources. They may begin unnoticed, spread quickly, and are often signaled by dense smoke that may be visible for miles. A combination of weather conditions, fuel availability, topography, temperatures, and rainfall often determine the severity and growth of wildfires. Drought conditions contribute to the likelihood of wildfire outbreaks, particularly in the summer months. In the event of a wildfire, the following procedures will apply:

- Remain alert to signs of wildfire in your immediate area and maintain awareness of changes in the direction of wind or smoke.
- Determine the relative location and size of the fire and take immediate action, as appropriate.
- Alert the Facility Manager.
- Follow the emergency response protocol.
- Evacuate and/or go to the designated assembly area.
- Protect yourself from smoke. Cover your nose and mouth with a face mask, cloth, buff, or scarf. If in a vehicle, roll-up windows and close air vents. Drive slowly with headlights on. Watch for other vehicles and pedestrians. Do not drive through areas of heavy smoke.
- Stay tuned to local news, emergency alert systems, weather forecasts, and updates for the latest statements, watches, and warnings.
- Do not try to outrun the fire; wildfires can move at speeds of up to 20 miles per hour.
- Do not re-enter the site until given approval by the Facility Manager.

2.2.2 *Flooding and Flash Flood*

Flash flooding is the result of heavy localized rainfall, such as that from slow moving, intense thunderstorms. A flash flood often results from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water that rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30 minutes to 6 hours of a heavy rain event. In hilly terrain, flash floods can strike with little to no advance warning. In the event of a flash flood, the following procedures shall apply:

- During periods of thunderstorms, remain alert to heavy rains in your immediate area or upstream from your location. It does not have to be raining at your location for flash flooding to occur.
- Do not drive through flooded areas, even if it looks shallow enough to cross.
- Do not cross flowing streams on foot where water is above your ankles.
- Be especially cautious at night. It is harder to recognize water danger in the dark.
- Do not attempt to outrace a flood on foot. If you see or hear it coming, move to higher ground immediately.
- Be familiar with the land features where you work. The site may be in a low area, near a drainage ditch, or small stream.
- Stay tuned to weather forecasts and updates for the latest statements, watches, and warnings concerning heavy rain and flash flooding,
- Wait 15 to 30 minutes, or until high water recedes.

2.2.3 *Tornado*

Upon the issuance of a tornado warning, site personnel will evacuate the site and report to the pre-designated shelter area. In the event site personnel are outside and unable to evacuate to the shelter, the following procedures will be followed:

- Lie flat in a nearby ditch or depression and cover the head with the hands. Be aware of the potential for flooding.
- It is safest to leave a vehicle for safe shelter.
- Beware of flying debris.

2.2.4 *Lightning Storm*

In the event a lightning storm is within 10 to 30 miles and is approaching the Project area, the following procedures will apply:

- Notify the SSO and on-site employees.
- If lightning approaches within 5 miles, stop work and get in and stay in company or personal vehicles that have rubber tires.

Remain in vehicles for at least 30 minutes depending on passing storm severity and wait for an OK from the SSO in charge for monitoring the storm.

Lightning can be a source of fire in the Project area and the surrounding area. Areas of lightning strike should be monitored for signs of ignition.

2.2.5 Snowstorm

Before winter approaches, the SSO will ensure adequate supplies, including the following:

- Sand to improve traction.
- Snow shovels and other snow removal equipment.
- As needed, service agreement(s) with snow removal vendors.

When winter weather threats exist, the SSO will monitor local news channels for critical information from the National Weather Service to stay alert to changing weather conditions. Winter storm watches, warnings, and advisories are issued by local National Weather Service Forecast Offices.

Extreme and fluctuating weather conditions, including high humidity, freezing temperatures, and ice storms, can cause ice to form on power lines. Ice weight can put a lot of stress on power lines and damage equipment. Snow, rain, or freezing rain can also create conditions to start pole fires. In the event of damaged poles or ice on power lines, the SSO will notify the site owner. If site personnel notice excessive ice buildup on a section of lines or downed lines, they will notify the SSO and take the following precautions:

- Stay clear of low or sagging lines and remember that traveling under these lines can be dangerous.
- Treat a downed line as though it is energized and keep other personnel away.
- Do not get out of your vehicle if the vehicle accidentally comes into contact with a downed line. If it is safe to do so, back slowly away from the line or wait for help to arrive.

Depending on the severity of the winter storm, the site may be closed.

2.3 Physical Security Breaches

If unauthorized access, vandalism, or any suspected security breach occurs, security alarms will activate, and local law enforcement will be contacted immediately. Site entry points will be secured until the threat is resolved.

Following the incident, the Site Manager will coordinate with law enforcement to inspect for property damage, missing equipment, and safety impacts. Personnel located near the affected area may be relocated to designated safe zones if the breach presents a credible risk to health or safety.

2.4 Cybersecurity Breaches

For any suspected cybersecurity compromise affecting operational systems or data infrastructure, personnel will immediately notify the designated IT security contact. Access to impacted systems will be restricted, and internal monitoring protocols will be applied to prevent escalation.

If operational control systems are affected, the Project will transition to manual oversight procedures until system integrity is restored. Staff will be instructed not to access or use compromised systems, and all communications will follow internal cybersecurity incident procedures. The Project's IT and cybersecurity teams will lead the investigation and remediation.

2.5 Mechanical Failures

When mechanical equipment malfunctions or presents a safety risk, work in the affected area will be stopped immediately. The area will be isolated until maintenance personnel assess and repair equipment. Routine inspections and preventative maintenance programs reduce the likelihood of mechanical failures.

If a mechanical failure creates a risk of injury (e.g., moving parts, stored energy, structural instability), personnel will evacuate the hazard zone. The evacuation radius will be determined by the Site Manager based on equipment characteristics and failure severity.

2.6 Chemical Spills

Chemical spill response will follow established spill-prevention and spill-control procedures. Inverters and transformers may contain insulating oils, and spill kits will be staged at strategic locations throughout the site.

In the event of a spill, personnel will isolate the area, deploy absorbent materials or contaminant booms, and notify trained spill-response staff. Depending on spill volume and material type, the Site Manager may initiate evacuation from the immediate vicinity. Larger spills or those posing a potential off-site impact will trigger notification to environmental emergency services and the Michigan EGLE Pollution Emergency Alerting System (“PEAS”).

2.7 Personnel Injuries and Serious Health Conditions

If a medical emergency occurs, onsite personnel will immediately call 911. Personnel trained in first aid or Cardiopulmonary Resuscitation (“CPR”) may provide care if conditions allow. Emergency responders will be escorted directly to the incident location.

All workers and visitors will be briefed on emergency medical procedures, including locations of first aid kits, Automated External Defibrillator’s (“AEDs”) (if installed), and emergency contacts. Serious injuries will be documented and reported to OSHA or other required entities. Minor injuries will be directed to appropriate off-site medical treatment facilities.

To prepare for these contingencies, all operating personnel, and as many other on-site personnel as possible, will be trained in CPR, bloodborne pathogen awareness, and the use of an AED. AEDs will be located in clearly marked and accessible areas known to all staff. Each site will also maintain at least one fully stocked first-aid kit in the control house and one in each site vehicle; these kits will be inspected at least monthly. The nearest approved non-emergency medical facility and occupational nurse contact information will be posted on site, although emergency responders will determine the final destination for emergency care.

If present, AEDs will be inspected every 90 days (or per manufacturer recommendations) and tested at least once every six months. Records of inspections, testing, and employee training will be maintained, and employees will receive annual notification and refresher training on the location and use of the AED.

Basic First Response Actions

Personnel discovering an injured or unresponsive individual should:

- Check for responsiveness and breathing;
- If the individual is unresponsive, immediately call 9-1-1 and direct another person to retrieve the AED;

- Assess airway and breathing; clear visible obstructions if present;
- If not breathing and no pulse is detected, begin CPR and continue until the AED is available;
- Once the AED arrives, follow all device prompts while continuing CPR (if applicable) until medical personnel arrive.

If the victim is conscious but severely injured or in visible shock, call 9-1-1 immediately. Do not attempt to move the individual unless remaining in place would create additional danger. Keep the victim still, control any profuse bleeding with direct pressure, immobilize injured limbs, and provide reassurance until emergency responders arrive.

Special Considerations

- **Electric Shock:** If electricity is involved, turn off the power source if possible and safely remove the victim from contact using non-conductive material. Begin CPR/AED only after the victim is no longer in contact with the electrical source.
- **Burns:** Cool the affected area, remove restrictive jewelry if safe, and never apply ointment or remove adhering clothing. Seek professional medical assistance promptly.
- **Heat Stroke / Heat Exhaustion:** Move the victim to a cool environment, begin active cooling (water/fanning), and elevate feet if the individual shows signs of heat exhaustion or shock. Rapid cooling is critical in cases of heat stroke and can be lifesaving.

2.8 Capacity or Transmission Emergencies

In the event of a grid disturbance, transmission fault, or utility-initiated emergency, Walker Road Solar personnel will coordinate immediately with the interconnecting utility. Operational curtailment or shutdown may be required to stabilize the system.

If an emergency originates onsite – such as a transformer fault or relay malfunction – qualified personnel will isolate and secure the affected equipment. All actions will adhere to the Project's electrical safety procedures and utility coordination protocols.

2.9 Traffic Incidents

If a traffic incident occurs involving construction or operations vehicles, the affected area will be secured, and emergency services contacted if injuries or hazards are present. Workers will be instructed to avoid the area until cleared.

All vehicle operators will adhere to designated haul routes, onsite speed limits, and safe driving practices. Spotters or flaggers will support heavy equipment movement, low-visibility conditions, or delivery activities. Traffic incidents will be reported to the Site Manager and law enforcement as needed.

3 EVACUATION PROCEDURES

Evacuation procedures are implemented when hazards present a risk to personnel safety or require movement to designated muster areas. During significant emergency situations at or near the Project area, the Facility Manager, in consultation with law and/or fire authorities, may issue an evacuation notice. When an evacuation has been called, on-site employees will gather at the designated assembly area. The Facility

Manager will account for personnel. Once employees are accounted for, they will safely travel from the Project area to safe zone, which are generally areas off-site away from the threat. Supervisors and the SSO will perform a sweep of the facility to locate persons and reconvene at the designated assembly area. Once personnel are accounted for, they will exit the site.

All evacuation routes and muster point maps will be posted throughout the facility and reviewed during the safety orientations. The primary evacuation routes will be via M-21 W towards the mall parking lot (see Figure 4).

3.1 Electrical Hazards

Electrical hazards generally do not require full-site evacuation. However, personnel within the immediate hazard zone will evacuate to a designated safe area. Evacuation distances will reflect voltage class, equipment type, and Site Manager judgement.

3.2 Severe Weather Events

During severe weather, personnel will move to designated indoor shelter locations. If an evacuation is required, predetermined egress routes will be used unless conditions render them unsafe, in which case alternate muster points may be established. Personnel accountability will be confirmed at muster points through sign-in logs.

3.3 Physical Security Breaches

Security breaches typically require localized relocation rather than full-site evacuation. Personnel in proximity to the incident may be moved to secure locations at the discretion of the Site Manager.

3.4 Cybersecurity Breaches

Cybersecurity incidents do not require physical evacuation.

3.5 Mechanical Failures

Mechanical failures may warrant localized evacuation if the malfunction presents a risk of injury. Evacuation distances will be established based on equipment characteristics and operational risks.

3.6 Chemical Spills

Chemical spills generally require evacuation only from the immediate area. Evacuation boundaries will be established by the Site Manager based on spill volume, material type, and risk of ignition or exposure.

3.7 Personnel & Visitor Medical Emergencies

Evacuation procedures focus on providing EMS responders with clear access to the incident location while relocating uninvolved personnel away from the area.

3.8 Capacity or Transmission Emergencies

These events do not typically require evacuation unless electrical hazards or equipment failures create a localized safety risk.

3.9 Traffic Incidents

Traffic incidents do not require full-site evacuation. Personnel will avoid the affected area until cleared.

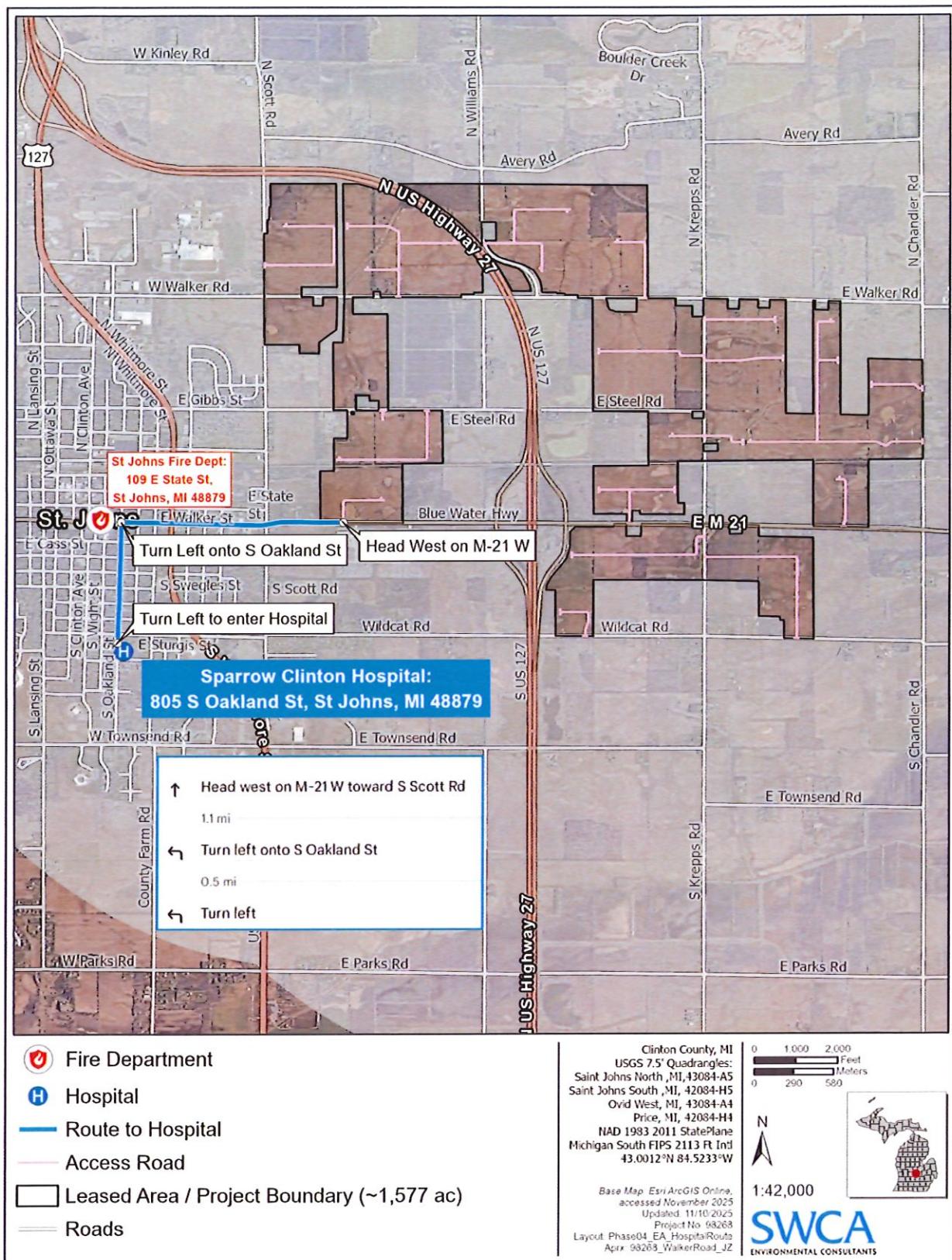


Figure 3. Fire and ambulance response access and route from Project site to Hospital.

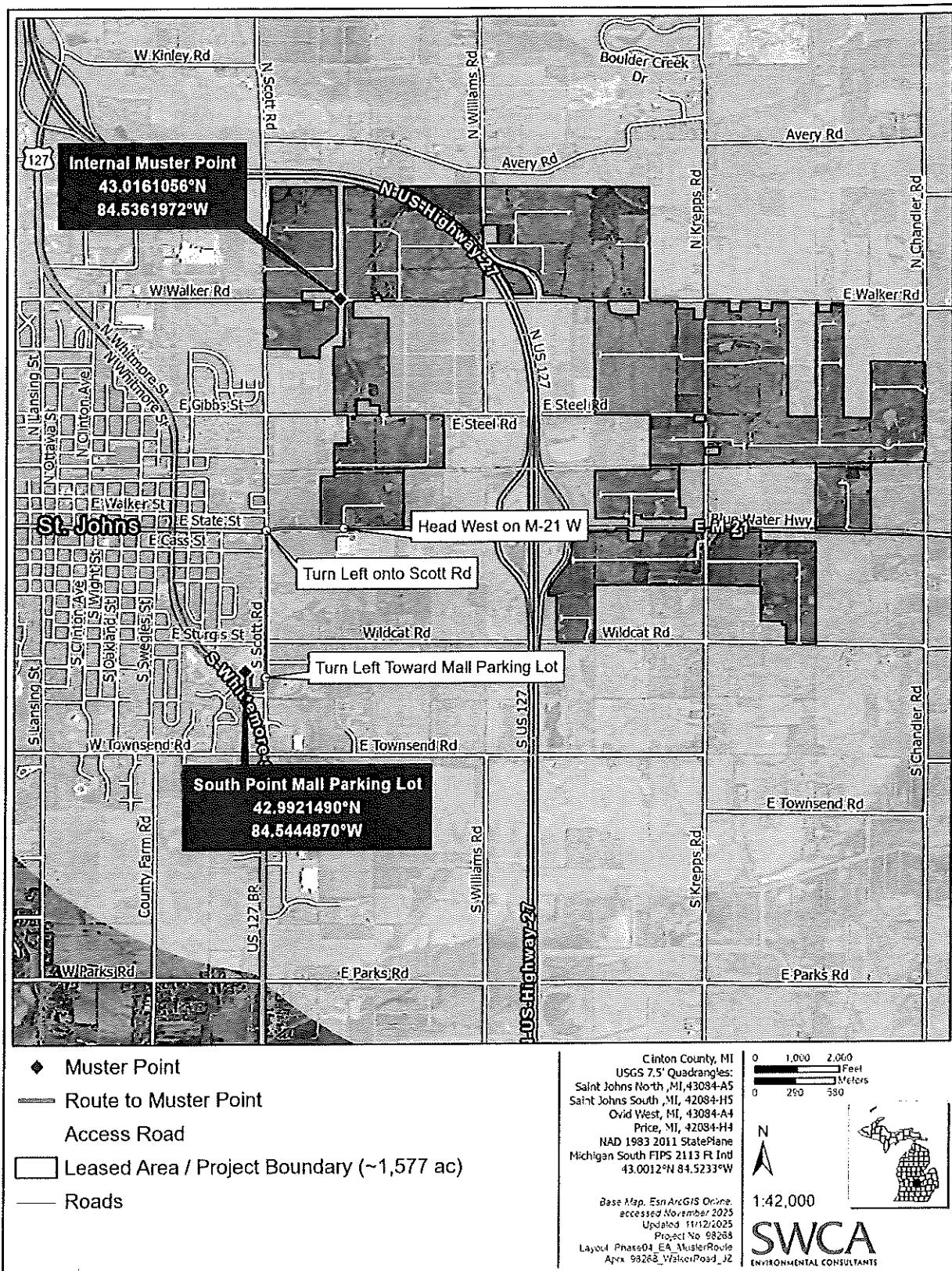


Figure 4. Emergency Evacuation and Muster Area

4 CONTIGENCY COMMUNICATION AND COMMUNITY NOTIFICATION

In accordance with AFIP §7.9(a)(5) and the MPSC, the Facility Manager shall ensure that timely and accurate notifications are made to community members and emergency response partners in the event of any contingency that could pose a risk to public health, safety, or the environment.

The Facility Manager, in coordination with Clinton County Emergency Management, the Bingham Township Fire Department, and other responding agencies, will utilize the County's emergency alerting systems (e.g., CodeRED, Nixle), local radio and television, and the Project website to provide emergency information to the public.

The following table outlines the community notification procedures by contingency, identifying notification triggers, required actions, dissemination methods, and responsible personnel.

Table 1: Community Notification Procedures by Contingency

Contingency Event	Notification Trigger	Primary Notification Actions	Dissemination Channels	Responsible Personnel
Electrical Hazard (e.g., downed line, energized fence, transformer fire)	Discovery of downed or damaged high-voltage equipment	Call 911 and project electrical contractor; isolate area and notify adjacent landowners if hazard extends offsite.	County emergency alert system (if warranted), Project website update	Facility Manager; Electrical Safety Officer
Severe Weather (e.g., tornado, high winds, flood)	National Weather Service (NWS) warnings or local emergency alerts that would pose a threat to the facility that could be harmful to the community	Notify all onsite personnel and suspend onsite operations; coordinate with Clinton County Emergency Management for public alert issuance.	County CodeRED/Nixle alert systems, local radio, Project website update	Facility Manager; County Emergency Management Director
Physical Security Breaches (e.g., trespass, vandalism, bomb threat)	Confirmation or credible report of threat	Contact law enforcement and activate site lockdown procedures; notify adjacent landowners if safety risk is possible.	County alert system (if warranted), local media release coordinated with law enforcement	Facility Manager; Clinton County Sheriff's Office
Cyber Security Breaches	Discovery of cyber breach that results in operational disruption or potential safety impacts	Local emergency management and law enforcement will be notified.	County alert system (if warranted), local media release coordinated with law enforcement, Project website update.	Facility Manager; County Emergency Management Director; Clinton County Sheriff's Office
Mechanical Failures	Discovery of failures that could impact community, such as noise or debris	Local emergency management	County alert system (if warranted), local radio, Project website update.	Facility Manager; County Emergency Management Director
Chemical Spill or Hazardous Release	Release of fuel, oil, or hazardous material exceeding reportable quantities	Notify 911 and Michigan EGLE Pollution Emergency Alerting System (PEAS); initiate containment; notify public if offsite migration possible.	County CodeRED/Nixle alert, local radio, Project website update	Facility Manager; Environmental Health Officer; County Emergency Management

Medical Emergency or Fatality	Serious injury, or fatality onsite	Call 911, provide immediate aid, and secure scene; notify corporate Health and Safety and County emergency personnel.	Direct coordination with EMS and fire personnel (no public alert unless community exposure risk)	Facility Manager; Onsite Safety Lead
Capacity or Transmission Emergencies	Event that could result in service disruption or pose public safety risk	Local emergency management	County alert system (if warranted), local radio, Project website update.	Facility Manager; County Emergency Management Director
Traffic Incidents	Incidents that impact public roadways or access	Law enforcement and local emergency management will be notified.	County alert system (if warranted), local radio	Facility Manager; County Emergency Management Director; Clinton County Sheriff's Office

4.1 Incident Reporting

Prompt and accurate reporting and investigation of work-related incidents, which include injuries, illnesses, and near misses, or accidents that could have caused serious injuries, are necessary components of effective accident prevention programs. This information can be used in evaluating and preventing hazards, fulfilling mandatory recordkeeping requirements, and filing for workers' compensation benefits. Incidents resulting in personal injury and/or illness require that the appropriate Office of Worker's Compensation Programs and Department of Labor procedures are followed, and forms are completed.

The Facility Manager is the primary point of contact for planned and unplanned outages. The Facility Manager will notify required parties, including the operation centers of utilities and asset management/owners, and field personnel via email for organized record keeping. Field personnel will be copied for informational purposes and seamless communication. Communication will be directed toward the Facility Manager unless the Facility Manager defers to a specific field supervisor/technician. The same protocol will be followed for reporting updates, including the root cause of an outage.

Emergencies, especially ones that involve property damage, will be reported as soon as possible to the Facility Manager. This includes both O&M personnel and temporary construction personnel during the construction and decommissioning phases. The Facility Manager will notify personnel of the situation and request dispatch, which may include requesting photographs that document the damage. Each facility or work area will maintain their own recordkeeping forms for injuries/illnesses.

4.2 Emergency Notification Procedures

An emergency at or near the Project area will trigger the emergency notification procedures identified in this section. The first call should be to 911 so that appropriate authorities can be notified and appropriate apparatus and personnel dispatched. Travel times to the Project area require notification of 911 as early as possible after a fire or other emergency has been observed. Emergency reporting is critical for tracking where, when, how, and why fire ignitions or other emergencies occur and will help the fire agencies develop protocols for reducing their occurrence.

A list of personnel who will be the primary points of contact to be notified during a fire emergency will be provided by the general contractor during construction and decommissioning, and by the O&M services

contractor during operation. Personnel contact information will include on-site Project team members and additional on-site personnel.

4.3 Evacuation Communication Protocol

If field personnel must travel out of the immediate area to seek refuge and/or may lose the ability to access the site's Supervisory Control and Data Acquisition system (loss of power, cell service, or internet), the Facility Manager will hand off the primary point of contact and site operator role to the Remote Operation Center.

4.4 Post-Incident Public Communication

Following any incident that triggers public notification, the Facility Manager and Walker Road Solar Farm corporate communications team will prepare a post-incident summary for distribution to local emergency management, Township officials, and the public. This will include a description of the event, response actions taken, and measures implemented to prevent recurrence.

5 EMERGENCY RESPONSE PROCEDURES

This ERP applies only to emergency actions to be taken in the Project area. After an evacuation, personnel will be governed by emergency plans of their respective agencies and/or local government authorities.

In reporting fires and other emergencies, the first call should be to 911 so that the appropriate apparatus can be dispatched. To facilitate the arrival of fire services during construction, an emergency response meeting point will be established. The SSO or designee will meet the emergency response team to lead them into the Project area.

5.1 Roles and Responsibilities

Employees should know how to prevent and respond to fires and are responsible for adhering to company policy regarding fire emergencies. The following sections detail general responsibilities by position.

5.2 Project Owner/Management

The Project owners/management are responsible for implementing necessary measures to reduce fire risk and comply with federal, state, and local fire safety/protection policies. Additionally, Project owners/management are responsible for making necessary training and equipment available to provide a safe working environment for employees and contractors.

5.3 Facility Manager

The Facility Manager will be responsible for the following:

- Directing occupants to the prescribed evacuation routes and notifying the Remote Operation Center of actions and updates.
- Ensuring that personnel know the evacuation procedures.

- Directing an orderly flow of personnel during drills and actual emergencies and reporting to the Remote Operation Center when their site has been evacuated completely.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

5.4 Remote Operation Center

The Remote Operation Center will be responsible for the following:

- Initiating action deemed necessary by the Facility Manager in an emergency.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

5.5 Site Safety Officer

The SSO will manage the ERP for the Project and will maintain records pertaining to the ERP. The SSO is also responsible for the following:

- Understanding the ERP and its mandates for training, fire prevention, fire suppression, and evacuation.
- Understanding the risk associated with the Project and with activities that will occur within the Project area.
- Developing and administering the risk prevention and safety training program.
- Ensuring that fire control equipment and systems are properly maintained and in good working condition.
- Monitoring combustibles on-site and managing where they are stored.
- Conducting safety surveys and making recommendations to the site manager.
- Stopping Project work activities that pose a hazard or are not in compliance with this ERP.
- Reporting fires ignited in the Project area—whether structural, vegetation, electrical, or other—to the fire department.

5.6 Supervisors

Supervisors are responsible for the following:

- Ensuring that employees receive appropriate fire safety training.
- Notifying the SSO when changes in operation increase the risk of fire.
- Enforcing fire prevention and protection policies.
- Accounting for employees/contractors in the case of an evacuation.
- Performing Project area sweeps to round up staff in the case of an evacuation.
- Facilitating fire agency access to the Project area.
- Cooperating with the fire agencies during and after fires.

- Identifying unsafe work practices that may lead to fire ignitions and correcting those practices in coordination with the SSO, as appropriate.

5.7 Employees/Contractors

Employees and contractors are responsible for the following:

- Completing required training before working in Project area without supervision.
- Conducting operations safely to limit the risk of fire.
- Reporting potential fire hazards to their supervisors.
- Following fire emergency procedures.
- Understanding the emergency evacuation protocols.

5.8 Emergency/Incident Command

As the facility does not store or have hazardous materials, store fuels, or contain or store chemicals in a quantity that would potentially create an incident that requires ICS it is not anticipated the facility would need to lead an ICS response. However, if an incident were to arise which would require the need for ICS, the facility would fall under Clinton County ICS and provide a Site Liaison and Site Safety Officer to work and coordinate with Clinton County as needed.

5.9 Contact Information

The personnel listed in Table 2 are the primary site contacts to be notified during an emergency. The specific personnel will be determined prior to the start of construction and the ERP will be updated accordingly.

Table 2. Primary On-Site Emergency Notification Contacts

Name	Position	Telephone Number
To be determined (TBD)	SSO	TBD
TBD	Construction Supervisor	TBD
TBD	EPC Foreman	TBD
TBD	Facility Manager	TBD
TBD	Construction Supervisor	TBD

Table 3 is a list of emergency-related contacts near the Project area¹.

Table 3. Emergency-Related Contacts near the Project Area

Emergency Service	Contact	Telephone Number
Fire	Saint John's Fire Department	(989) 225-2151
Fire	Bingham Township Fire Department	(989) 658-8651
Ambulance	Clinton Area Ambulance Service	(989) 224-2428

¹ These Contacts will be updated and provided prior to construction starting

Emergency Service	Contact	Telephone Number
Clinton County Sheriff	Sheriff Sean Dush	(989) 224-5200
Michigan State Police	Lansing Post	(517)-322-1907
Hospital	Sparrow Clinton Hospital	(989) 227-3400
Michigan Occupational Safety and Health Administration	Lansing, Michigan, office	(517) 284-7750