Grid-Scale Power

Community Engagement Plan

Rich Road Solar Energy Center

January 31, 2024

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Introduction

New York's nation-leading climate legislation, the Climate Leadership and Community Protection Act (CLCPA), includes a target of delivering 40% of the overall benefits from New York state's climate programs to disadvantaged communities. EDF Renewables (EDFR) will contribute to supporting this goal with its Rich Road Solar Energy Center ready to contribute up to 240 MW of clean energy to New York State. The outcomes envisioned by this Community Engagement Plan offer a thoughtful approach to building community support while respectfully responding to interests.

EDFR recognizes and appreciates that local governments and stakeholders including landowners, play an important role in the process of evaluating and advancing large scale renewable siting in New York State, and in shaping developments that may be permitted in their communities. EDFR asserts responsibility for implementing the following Community Engagement Plan, that supports an open and inclusive public process and encourages feedback throughout the development and construction of the proposed solar project.

EDFR is committed to delivering benefits, both economic and environmental, to New York State disadvantaged communities, in alignment with the CLCPA and its stated prioritization of benefits and avoided social costs to disadvantaged communities, including low-income and environmental justice population participation in the benefit creation process. EDFR's efforts will also help build on and support NYSERDA's goal of supporting economic benefits within New York state for renewable energy projects. Due to the rural geographic location of many of EDFR's NYS solar projects, we apply and uphold NYSERDA's March 2023 disadvantaged community additional criteria of individual household threshold of 0-60% state median income level, as will be displayed in the following community engagement plan.

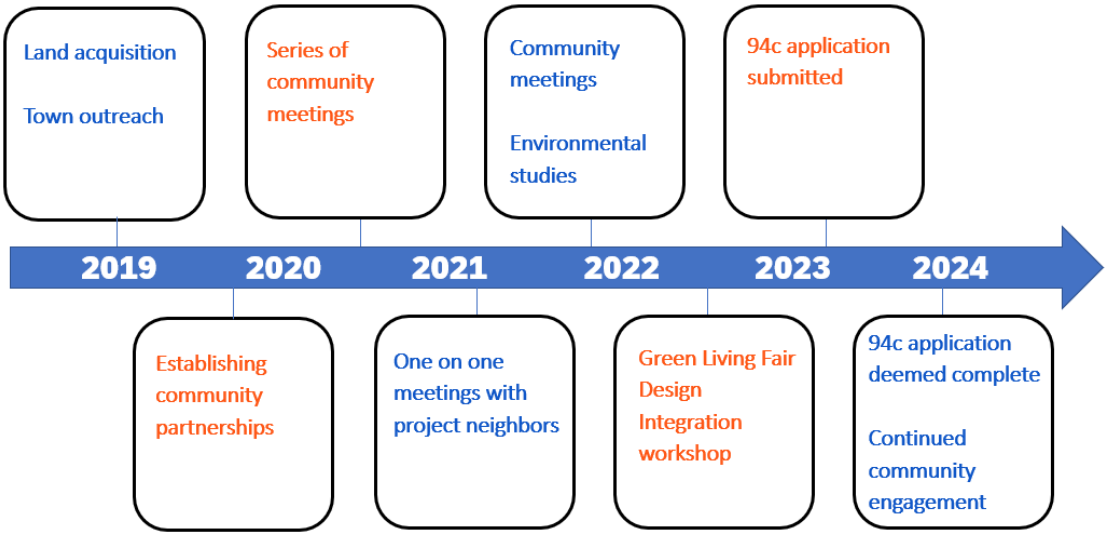
Every school district, town, and county where our projects are located have different needs and priorities. This Community Engagement Plan supports an open, inclusive, and transparent public engagement process. This includes regionally targeted education and information campaigns and encourages an open exchange with residents, businesses and community groups where our projects are located. Throughout the development, construction, and operational phases of the proposed facilities, EDFR's efforts to understand and embrace local priorities and interests will ensure that the benefits that EDFR provides to its host communities, economic or otherwise, are aligned with their needs.

The following plan incorporates an understanding of local interests and concerns, provides valuable public education opportunities, demonstrates a commitment to partnering with the elected officials in the host communities, and details a plan to respectfully respond to interests and prompt input from the public and affected agencies.

1. Local Authorities Having Jurisdiction (AHJ)

Local Authorities Having Jurisdiction (AHJ)	Town of Canton Town and Village of Canton Highway Department St. Lawrence County Highway Department
Taxing School District	Canton Central School District
Local Elected Officials Name(s), Contact Information, and Tenure	Mary Ann Ashley Supervisor Town of Canton 315-386-2962 mashley@cantonny.gov

2. Community Outreach Strategies and Activities to Date



Overview of Commitment To Clean Energy Development: EDF Renewables recognizes that grid-scale solar projects are a relatively new concept throughout the state of New York, and is committed to educating local officials, landowners, neighbors, and the community at large about the technology, impacts, and benefits of solar energy. Through its efforts in following the Article 10 and Section 94-c permitting processes, EDFR has shown a commitment to engaging with its projects' host community residents, neighbors, businesses, government leaders, and community groups to ensure an open exchange of ideas and transparency about the projects.

Often, a lack of information can create confusion about a project. By sharing project details, including mitigation measures and permitting constraints, more meaningful dialog can take place. More

importantly, receiving input from the community early in the development cycle uncovers critical information that can be used to help craft a project in ways that help maximize support from the community in general. The exercise of sharing information, receiving, and responding to feedback helps to realize a project with the community in mind while seeking to improve overall project acceptance.

Actively participating in grid-scale solar energy development in the state of New York since 2017, EDFR has demonstrated a serious commitment to solar energy education through extensive educational and community outreach. Our efforts include open houses/public meetings, one-on-one meetings with neighbors, community groups, municipal leaders, conferences, written materials, podcasts, videos, webinars, newsletters, direct mail, newspaper ads, and more with the goal of maintaining open channels of communication and becoming a trusted member of the communities where its projects are located.

RICH ROAD SOLAR COMMUNITY OVERVIEW

Located in the North Country region of New York, in St. Lawrence County, the Rich Road Community reflects that of several groups. Namely, the town of Canton sits along route 11, the major thoroughfare from Watertown to Potsdam, major cities in the North Country. The town of Canton is agricultural, prioritizing its local waterways and ecosystems such as the Grasse River, leaning into the adventure economy the North Country has to offer. The Rich Road Solar project touches one k-12 district, the Canton Central School district. In addition, the area has four different higher educational institutions that the Rich Road Solar project has and will continue to partner with including SUNY Canton, St Lawrence University, Clarkson University and SUNY Potsdam.

As a NYSERDA Clean Energy Community and Climate Smart Community, the town of Canton maintains many goals for their community that mirror and reflect the goals of Rich Road Solar such as lowering carbon emissions and reducing local energy burdens for the residents of the town of Canton. The solar project will continue to work with the local sustainability committee and other dedicated members of the community to partner on such interests.

As one of the premier agricultural counties in the state, Rich Road solar works to integrate with St Lawrence County by siting the project on minimal prime agricultural land and cultivating relationships with the local agricultural community through tours of agri-pv sites at Arnprior Solar, an EDFR project in Canada.

EDFR currently operates the Copenhagen wind farm in the North Country region and is also developing the Tracy Solar project in Jefferson County, and thus has established itself as a trusted regional partner in the Rich Road community.

Rich Road Solar Outreach to Date

EDF Renewables started developing the Rich Road Solar Energy Center in Spring 2019, upon acquiring the project's initial core landowners and Rich Road Solar first met with the Canton Town Board Solar Committee on April 24, 2019, to present the project, share the potential site map, and other project information. Since then, about a dozen landowners have signed up to host solar panels and interconnection facilities.

An intensive community engagement campaign included hosting an Open House Public Meeting on July 22nd, 2021, for adjacent landowners, local stakeholders, and municipal officials. Approximately 60 people

attended the meeting. EDF Renewables notified locals of this meeting in a local newspaper and sent an invitation to everyone in the project area, along with those up to 1,000 feet from the project boundary. The invitation was mailed to 1178 households more than 14 days prior to the scheduled event.

Reporter Paul Mitchell from *North Country Now* reported on the open house on three separate occasions. On July 14th, in a story titled, *"Talks continue on $300M Canton solar farm that could be complete by 2025"* mentioned the time and date of the open house. Subsequently, on July 19th they published another article titled "*Community open house Thursday regarding 240-megawatt solar farm planned in Canton"* that provided details of the open house and background information on the project. Then the day after the open house they included a photo from the open house with a caption.

Additionally, the Watertown Daily Times reporter Ellis Giacomelli wrote two articles that mentioned the open house. The first was published on July 19th and titled *"Canton Town Council passes energy storage law as commercial solar development interest grows".* The second article titled *"Commercial solar farm being developed in Canton through new state siting process"* was published on July 24th and included considerable background information on the project and the 94c permitting process.

On April 20, 2022, letters were sent to the Town of Canton's Supervisor listing applicable substantive requirements and local laws with an outline of efforts made by the Project to comply with the laws during development. The Town responded in writing on August 14, 2022, after several coordination meetings between the Project and town representatives were completed to discuss local law requirements in detail. On June 14, 2022, Rich Road Solar sent a letter to the Town of Canton's Supervisor regarding visual impacts consultation. The letter included a visually sensitive resource list and map and a photo log identifying potential key observation points, with recommendations for nine visual simulations.

Rich Road Solar and its attorneys engaged in consultation with the Town of Canton, with attendance from the Town's code enforcement officer, council members, and a St. Lawrence County Planning representative on several occasions, as summarized:

- June 22, 2022, Rich Road Solar distributed materials showing the preliminary Site Plan, overview of environmental studies, draft transportation routes to be used for construction, noise monitoring locations, a viewshed map and photo log identifying potential key observation points, and next steps in the permitting process.

- On July 15, 2022, and again on September 16, 2022, Rich Road Solar distributed revised materials showing preliminary site plan development and visual screening materials to discuss the layout of solar arrays and potential visual buffering along US Route 11.

- On August 15, 2022, Rich Road Solar presented on taxation and finance structures, discussed project economics, and initiated the conversation about PILOT and Host Community Agreement terms.

- On November 17, 2022, Rich Road Solar met with St. Lawrence County and provided the St. Lawrence County Executer with a copy of the Visual Impacts consultation, draft landscape mitigation plan and an update on the status of ongoing coordination between Rich Road Solar,

Town Representatives, and in July 2022, Rich Road Solar Energy Center hosted a second public meeting at SUNY Canton. A postcard invitation was mailed to the members of the community.

To assist the local community in navigating the Office of Renewable Energy Siting 94c permitting process, Rich Road Solar hosted a series of informational meetings to provide a deeper insight into both the state process and the Rich Road solar site-specific permit. Careful consideration went into the 94c siting permit to reflect the importance of local waterways and wildlife in the community.

Both in April of 2022 and October of 2023, EDF Renewables participated in the Green Living Fair hosted by SUNY Canton, St Lawrence University, SUNY Potsdam and Clarkson University. In October of 2023, EDFR hosted a design integration workshop, wherein posterboards showing different design aspects of Rich Road Solar and potential agrivoltaic site designs. Feedback was gathered to be incorporated into final design phases.

Historically, the Rich Road public involvement program plan for the Article 10 process, as well as Exhibit 2, Overview and Public Involvement of the Office of Renewable Energy Siting 94c siting process, can be found on NYS Department of Public Service Document Matter Master. Please relevant documentation for Rich Road Solar at https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=19-f-0461&submit=Search

EDF Renewables completed necessary permitting activities in 2021 and 2022 and received its determination of completeness from the Office of Renewable Energy Siting in January 2024, allowing for construction in late 2025-2026 and operations to begin by 2027.

During the operational phase of the project, relationships with the community are managed by EDFR's asset optimization team, local site manager, and land and community engagement team. The primary focus of their community relationships are educational and partnership opportunities, ensuring the project is operating safely, and maintaining the requirements of our permits (for example vegetative buffering for visual impact). Refresher training for first responders and emergency personnel are held as needed and opportunities for field trips or educational seminars are available for local students.

Overall, EDFR is committed to a thorough community engagement program, listening to neighbors, and providing the information and resources necessary to help inform them about solar energy and the Project, so the project and its benefits are successfully integrated into the community for years to come.

3. Direct Benefits to the Community

The project team at EDF Renewables and many community members are excited to see the project be realized, as it will provide many benefits for the community, including:

- More than $800,000 in new revenues on an average annual basis for the town, county and school districts.
- More than $1,000,000 annually in landowner payments.
- $175,000 per year in residential electricity bill credits (for the first 10 years of operation). This amounts to $30-40 per household in the town of Canton.

- $50,000 annual Share the Sun Fund community benefit fund (during construction and for the first 10 years of operation) to help support local organizations, in addition to any host community agreements or PILOT payments
- Other benefits including jobs during construction and operation, and opportunities for material supply and services and opportunities for the hospitality sector.
- Two $2,000 annual scholarships to the Canton School District with for students interested to pursuing a post-secondary program in the trades or has a renewable energy component, with the option for a second-year renewal for the recipients
- Some of the above-mentioned investments are anticipated to benefit disadvantaged communities in the North Country region as well as the 27% of households in the town of Canton that fall within the 0-60% state income level threshold for disadvantaged community criteria.

The EDFR solar project represents a significant investment in the local towns, county, and the state of New York. The project would rank among the largest, by investment, in the Town of Canton. The project also demonstrates alignment with the CLCPA, as well as this solicitation's stated prioritization of benefits, including job creation and support for disadvantaged communities. The project will help grow and support New York's bourgeoning renewable energy supply chains and workforce.

In addition to the category of alignment with the CLCPA, investments in the community fall into three primary categories:

- *Job Creation*: Includes temporary construction jobs and long-term jobs for the life of the facility.
- *Contribution in Taxes and Revenues*: Includes income from PILOT's and/or Host Community Agreements, special district taxes, taxes on underlying land and agricultural exemption conversion penalties.
- *Direct Economic Benefits*: The initial spending on the construction and operation of the photovoltaic (PV) installation creates a second layer of impacts, referred to as "supply chain impacts" or "indirect impacts." Indirect impacts during the construction period consist of the changes in inter-industry purchases resulting from the direct final demand changes and include construction spending on materials and PV equipment and other purchases of goods and offsite services. Focusing on local or in-state indirect benefits, we see the greatest impact in the hospitality, material supply, and construction services sectors.

Alignment with the CLCPA

Furthermore, the project contributes to New York State's goal of 70% renewable energy by 2030. EDF Renewables contracted Leidos to conduct an independent study of the impact Rich Road Solar would have on the New York state electric power system power plant emissions. The study concluded that when operational, Rich Road Solar can reduce New York State power system power plant carbon dioxide (CO_2) emissions by 0.6%, or 149,142 tons per year, and NO_x emissions by 0.8% (45 tons per year). The results of this study demonstrate that transitioning to an energy market comprised of an increased portion of renewable energy has a positive effect in lowering the negative externalities associated with fossil fuel generation (environmental, public health, and economic).

As we've shown, EDFR's efforts to bring clean energy to New York are not only aligned with the goals of the CLCPA, but also with NYSERDA's five core mission outcomes which are greenhouse gas emissions reductions, driving steady and reliable procurements of renewable energy, driving energy efficiency and

building decarbonization, building New York's clean energy economy, and aligning infrastructure, investment, and energy system planning to create a resilient and distributed energy system.

To do its part in addressing the environmental justice aspects of the CLCPA, Rich Road Solar will be investing its communities for workforce development, education, household energy efficiency and by responding to local community needs. This will be addressed further in the document in the Benefits to Disadvantaged Communities section.

To ensure these benefits are integrated into project communities, EDFR believes in creating longstanding partnerships with organizations like local school districts and higher education institutions, BOCES, community groups like Veterans of Foreign Wars or Boys/Girls Scouts, food pantries, county and regional program partners like workforce development boards and NYSERDA Clean Energy Community Coordinators or Clean Energy Hubs.

Looking at the larger picture of upstate New York, EDFR's developments will also have a positive impact on the cities and regions they sit between, including Buffalo, Rochester, and Syracuse, and the Adirondack North Country area each of which include significant disadvantaged communities. Through these projects, EDFR is helping to grow a connected and growing renewable energy supply chain in these cities, while developing a skilled local workforce and supporting New York's nation-leading transition to a renewable energy future.

Economic Development/Local Job Creation: Rich Road

Figures released by the U.S. Bureau of Labor Statistics indicate that St. Lawrence County has an unemployment rate of 4.1 % as of November 2023[1]. However, the county hit a high of unemployment during the start of the COVID-19 Pandemic in April 2020, with a rate of 15.4%. The job creation from the project construction will provide contracted work to local workforces for a secured timeline. The Rich Road Solar Energy Center is proposed to contribute over $20 million in direct payments, averaging more than $800 thousand per year, to the town of Canton, St. Lawrence County, and host school districts in the first 20 years of operation. This value includes PILOT and/or Host Community Agreements, special district taxes, taxes on underlying land, and agricultural exemption conversion penalties.

More than 250 jobs will be created at the peak of construction, and four full-time, high-paying jobs for its 35+ year operating life. In addition, this will provide much needed training opportunities, setting individuals up for a career in one of the fastest growing industries of the future.

To assist in bringing these opportunities to the local community, EDFR commits to workforce development, which will be discussed in greater detail in following sections.

Contributions to local Revenues and Direct Economic Benefits

While these sections will provide significant localized contributions for the Rich Road Community, the contributions to local revenues will be discussed in the following section of this document, PILOTS. With many of the direct economic benefits listed above, the economic benefits sections of this solicitation cover the direct benefits in detail.

[1] St. Lawrence County Unemployment Statistics | LiveStories

With a fervent commitment to project communities, EDF Renewables exceeds the base level expectations of benefits a project can bring to a community through listening and responding to needs in real time and bringing the following programs to our communities.

- Share the Sun Fund- $50,000 annually fund given to local organizations. The winners are selected after review of their applications by a local review committee for a truly locally driven process
- 2x $2,000 Scholarships for students at Canton Central school district interested in renewable energy or the trades
- In person education and outreach events from arts festivals to environmental summits, to school homecomings and county fairs
- Partnerships with local unions such as IBEW, LiUNA and Operators
- Presentations, scholarships, and partnerships with renewable energy schools such as SUNY Morrisville, SUNY Canton, Clarkson, SUNY Potsdam, and St. Lawrence University
- Workforce Development offerings as an intro to solar with a virtual reality headset tour of a solar construction site and a two-part online training series with SUNY ESF in partnership with local NYSERDA Clean Energy Hubs

4. Benefits to Disadvantaged Communities

Recognizing most of the state's utility scale renewable energy projects are located in rural areas, and thusly the majority of the project benefits should be directed into the communities most impacted by the development of renewable energy projects, EDFR maintains the NYSERDA March 2023 definition of Disadvantaged communities to adequately address rural poverty, wherein households that fall within the state level threshold are disadvantaged communities. In addition, recognizing regional impacts of any kind of development, EDFR works closely with county and regional organizations to create opportunities for nearby disadvantaged communities. EDFR further recognizes some of the biggest burdens are local funding opportunities, workforce development and household energy efficiency.

According to the March 2023, NYSERDA DAC map and additional criteria, the Rich Road Solar project would be adjacent to a DAC in Heuvelton, with nearby DACs in Massena and Hammond. Additionally, in the town of Canton, 27% of households fall within the 0%-60% state income level threshold to qualify as a disadvantaged community member. For these households, the average energy burden is 9.5%

Local Funding Opportunities

Rich Road Solar Energy Center is dedicating $50,000 for ten years beginning at the start of construction for the project's Share the Sun Fund community benefit Fund. Often times, local nonprofits have a hard time finding funding such as local food pantries and serve the members of communities who are most in need of assistance. Winners of these funds are chosen by a local selection committee.

Two scholarships of $2,000 each will be created for the Canton Central School District, and we will be working with county workforce organizations and homeowner organizations to implement programs for disadvantaged communities both in project communities and counties. The project will also provide an opportunity to source construction labor, materials, subcontractors, and vendors directly from this disadvantaged area.

Job Creation and Workforce Development

The Rich Road Solar Energy Center will bring much-needed job opportunities not only to the host town, but also to neighboring disadvantaged communities. Construction jobs will offer prevailing wages, hands-on learning, and serve as a starting point to gain relevant knowledge and experience in the fast-growing energy industry. Full time operations jobs will pay an average of 16-19% above the average state level, depending on the position.

There will be approximately 250 union jobs created at the peak of construction and four additional full-time, high paying operation jobs for the project's 35-year operating life. Tailoring to various job experience levels in the community, there will be jobs available such as laborers, technicians, electricians and construction workers. The Rich Road Solar Energy Center will create opportunities in the energy sector, which is a growing field of work because of the state's rigorous renewable energy goals. From 2016 –2018, workforce growth in the energy industry was 8.9% in New York State, which has positively contributed to growth for the economy. It is projected that in the next 10 years solar technician demand will increase by 50% in New York State. These jobs will provide much needed training opportunities, setting individuals up for a future career in an expanding industry.

While the direct contributions made by Rich Road solar will focus on the projects host towns, school districts, and the county, its proximity to Heuvelton, Massena, and Hammond will provide an opportunity to source hospitality, services, construction labor, and materials, subcontractors, and vendors from both disadvantaged community members and recognized DACs in the North Country.

EDF Renewables plans to promote workforce development in the disadvantaged communities and to members of the Rich Road area, by cultivating career pathways in the solar industry. First, EDFR has partnered with ExPR to offer a virtual reality headset tour of a solar construction field, all while different careers in the solar industry are discussed, as well as showing a finalized site with sheep grazing. EDFR will offer this virtual reality tour to students at local high school and community colleges to introduce students to a two-part solar training series with SUNY ESF out of Syracuse. Part-one serves as a four-week online training through Coursera, while part two is an in-person training session with a professor from SUNY ESF as well as local union partners. This two-part training series will introduce participants (high school through continuing education) to a variety of careers and career pathways in the solar industry. EDFR will sponsor the cost of this program for participants and highlight our disadvantaged members to assist in the workforce leg of a Just Transition. EDF Renewables intends to distribute a flyer that highlights the opportunities to pursue a career in renewable energy and promotes the training opportunity as well. EDFR will partner with local workforce development organizations, schools or libraries to offer access to computers and Wi-Fi to assist with equity considerations.

Energy Efficiency/Carbon Reductions

In efforts to directly address several goals of the Climate Leadership and Community Protection Act at once, EDF Renewables will initiate an energy efficiency program for homeowners within the DAC income level threshold within the town of Canton. The funds will be administered by the Adirondack North County Association, as the regional Clean Energy Hub, responsible for household level energy efficiency measures. Households and vendors will be selected by ANCA, as a trusted community partner. As of January 2024, three homes in the town of Canton were selected to share $20,000 in upgrades, these upgrades will further allow these households to be eligible for additional NYSERDA funding programs, removing an

important barrier to entry for many disadvantaged households in project communities. Upon receipt of a NYSERDA Tier 1 award, Rich Road Solar is committed to investing another $220,000 into this program for households in the town of Canton. Should all eligible and interested households be funded in the town of Canton, any remaining funds are to be distributed to the nearest DACs such as Heuvelton and Hammond. EDFR is proud of this program, to directly assist one of the biggest individual energy burdens and challenges of the CLCPA, in bringing energy efficiency to disadvantaged households in rural New York.

Local Educational Opportunities

The project will be able to provide well-paying jobs to locals who completed relevant educational programs. SUNY Canton, a public university located in Canton, offers relevant courses and programs under the areas of Electrical and Power Transmission Installation, Mechanical Engineering, Building and Construction Site Management, and Electrical Engineering. Working with this local institution can increase opportunities for minorities and other underrepresented groups, where underrepresented minorities make up at least 27% of the student body and 57% are Pell grant recipients. Within a close distance of the project, Clarkson University in Potsdam also has relevant courses and programs, such as Electrical Engineering and Environmental Engineering. In fact, many of the electrical engineers working on EDFR projects are alumni of Clarkson University. Underrepresented groups make up at least 13% of the student body and 23% of students receive Pell grants. These represent just two of the many institutions in the North Country where students are learning skills which could propel them into a career in renewable energy, and perhaps the Rich Road Solar Energy Center. In 2023, EDFR donated to SUNY Canton, to provide scholarships to students in need in their electrical engineering program as well as assist in funds to finalize their solar array to better teach the students in real-time as well as provide, clean, emissions-free, localized power to the campus.

5. Payments in Lieu of Taxes or Host Community Agreements

The Proposer has discussed Payments in Lieu of Taxes and Host Community Agreements at all public meetings including Town Board meetings with the Town of Canton with the St. Lawrence County Industrial Development Agency. EDF Renewables held an introductory meeting with the St. Lawrence County IDA on August 10th, 2021, and we look forward to negotiating these agreements with the Town, county, schools and IDA. EDFR has an existing relationship with the St. Lawrence County IDA from three (3) community solar projects which executed PILOT agreements in early 2021. In November 2023, Rich Road Solar met with the St. Lawrence County IDA to discuss future PILOT and host community agreements. Currently, Rich Road Solar is working with the town of Canton to discuss the host community agreement and once finalized, Rich Road Solar will again begin PILOT discussions with the county IDA. EDFR looks forward to creating new revenue streams for the town, county and school district, that have great potential to benefit the community for the life of the PILOT.

6. Local Interests/Concerns and Mitigation Efforts

In our over 35 years of renewable energy development experience in North America, EDFR has come to find, there are two main factors that contribute toward building community support and responding to opposition:

- Providing education about the facility – often, a lack of information can cause confusion about the project. By sharing project details including mitigation measures and permitting constraints, more meaningful dialog can take place.
- Receiving feedback from the community – more importantly, receiving input from the community early in the development cycle allows for critical information to be known that can help craft a project in way that helps maximize support from the community in general.

The exercise of sharing information, receiving and responding to feedback helps to realize a project with community in mind while seeking to improve overall project acceptance.

Below are specific examples indicating of how informing stakeholders and/or receiving feedback either influenced project decisions or helped build community support at the Rich Road Solar Center:

During development of Rich Road Solar, some concerns surrounding the impact to local farmland were raised, as a general response to solar development in rural areas. Rich Road solar was able to take an exemplary response to this concern, having a project with little areas sited on prime agricultural lands. In addition, Rich Road Solar enacted "mitigation in place" to smart design the solar facility to account for native wildlife and wetlands that are characteristic to the local community.

Further, EDFR brought members of the Rich Road agricultural community to its Arnprior solar facilities in Ontario, Canada. The site hosts more than 300 sheep grazing under the solar panels, bees that produce 300 jars of honey annually, and milkweed creating habitat for endangered monarch butterflies. These initiatives are a commitment to biodiversity, increasing land productivity, and are emblematic of EDFR's mission to lead the transition to a truly sustainable energy future by collaborating with the local communities, local agricultural businesses, and landowners.

During a public meeting for Rich Road Solar, a neighbor brought up a concern for visual buffering. In response, project developers had several sit-down meetings with this project neighbor to discuss project design and visual buffering to arrive at a mutually beneficial solution.

Finally, when local community members wrote several letters to the editor with concerns about the project, EDFR hosted an informational meeting for those community members, along with additional stakeholders, to respond to both the 94-c siting process and any other concerns the community may have. As a result of this meeting and the communication efforts with the group, the group did not seek to obtain party status in the 94-c Application review process and have not expressed any further concerns, showing a success in having these meaningful conversations about the project and its many benefits.

In efforts to further include community feedback into the design process, Rich Road solar hosted a design integration workshop at the Green Living Fair in October of 2023. Project developer Jonathan Geldard and Community Relations Manager Haylee Ferington hosted an hour and a half long iterative dialogue on integrating the project into the design of the community. Outcomes involved finding creative uses for additional lands not used in project design, incorporating pollinator or bird areas, as well as continuing to partner with local organizations on sustainability initiatives.

The integration of solar grazing and bee keeping at Rich Road Solar Energy Center has the potential to create additional value/revenue streams from locally raised, grass-fed solar lamb and solar honey that could be produced at the solar facility and sold to consumers in New York State (NYS). EDF Renewables

heard from many farmers across New York State who have an interest in grazing sheep under solar panels confirming that solar grazing can be a real opportunity for Rich Rd Solar.

Communities also express an interest in how the project might benefit the local towns and schools, and its potential effect on their taxes. The Project through the PILOT and/or Host Community Agreement, special district taxes, taxes on underlying land, agricultural exemption conversion penalties is proposed to contribute more than $30 million in direct payments to the Town of Canton, St. Lawrence County and associated school districts in the first 20 years of operation. In addition, a $500/MW payment will be made annually to offset residential electricity bills for the first ten years following commercial operation amounting to $175,000 per year, providing between $30 and $40 relief per household in the Town of Canton on annual electricity bills.

EDFR believes their projects are a strong fit for NYSERDA and the local communities because they foster meaningful relationships that are built to last and be mutually beneficial.

7. Strategies to Mitigate Concerns Raised by the Public

Visual Impact Concerns

Neighboring landowners are often concerned with visual impacts on their homes resulting from large-scale solar projects. EDFR focuses on meaningful consultation with project neighbors, intended to foster long-lasting relationships with those living closest to its facilities, as any neighbor would. Often, neighbors abutting our facilities express an initial concern about the impact our facility may have on their viewshed or property value. Through multiple meetings that normally take place at the neighbor's home, EDFR finds common ground and works together to resolve issues by understanding how they view our project and providing them with more information.

Normally, most concerns are resolved by creating a trustworthy relationship and being available as needed, perhaps enhancing some of the setbacks being proposed and giving the neighbor some options on the type of visual buffering that will be integrated around the project perimeter. Sometimes, consultants from the EDFR team visit the neighbor's property and take photos of representative viewpoints to create visual models of what the project might look like. Normally, these visualizations are greatly appreciated and help create partnerships.

General Education of Municipal Officials and Residents

EDF Renewables works across municipalities, the region, and the state to educate project communities about solar and its benefits. To educate municipalities at a state level, EDFR regularly donates to United Solar Energy Supporters, who host important webinars on solar energy. Community Relations Manager, Haylee Ferington serves as technical advisor for USES, and development team members have presented on USES webinars. In addition, EDFR team members have presented at universities and schools on solar energy. EDFR also partners with New Yorkers for Clean Power on initiatives like the 2023 State Fair, where EDFR made over 75 solar bracelets with engaged fair goers as well as in 2021/2022 for solar car workshops across western New York!

As mentioned, to address municipal assistance, EDFR provided an ESCROW account, so municipalities could hire consultants and legal staff in the collaboration efforts leading up to the 94-C application where

Intervenor funding is provided as part of the permit review process. This increased the quality of the conversations between the municipalities and Project in the application development phase and avoided any potential expense of the Town's engagement to the local taxpayer. In addition, EDFR will take municipalities on bus tours, provide trainings, and have in depth conversations at request and need of host municipalities to ensure all needs and questions are met.

Co-Location Opportunities and Challenges

EDF Renewables supports opportunities for the integration of agricultural activities including agricultural coproduction, pollinator support, and native habitat support at their large-scale ground-mounted solar projects included in this bid submission.

Large-scale solar developments tend to seek out land that is relatively flat, free of existing obstructions, and are limited in the negative impacts imposed on natural heritage features (i.e. wetlands). Due to this economic design preference, solar developments and agricultural land tend to overlap. It is a common misconception that it is an either/or option. Solar development and agricultural endeavors have the potential to be integrated in a successful and meaningful way.

For example, in another EDFR project and in collaboration with the Town of Mount Morris, EDFR has been actively engaged to investigate the feasibility of integrating agrivoltaic solutions into the 177 MW Morris Ridge Solar project by working on a report that investigates the economics of hosting sheep and bees and supply chains for selling their products. The collaborative team working on this report, comprised of experts in their fields of study, includes Agrivoltaic Solutions, LLC experienced sheep farmers working with solar developers to promote grazing sheep on solar installations; Juniper Economic Consulting with 18 years of experience managing agricultural economic market analyses, feasibility studies, economic impact studies, and policy recommendations specifically tailored to the U.S. sheep industry; Sweet Grass Food & Farm Consulting supporting honey bee best practices and economic feasibility; and Letchworth Gateway Villages (LGV) a municipal collaborative initiative designed to catalyze economic growth within the region and supporting marketing and outreach for the locally raised, grass-fed solar lamb and solar honey that can be produced at the solar facility and ideally sold to consumers in the area.

The objective of the proposed 177 MW (about 1,000 acre) Morris Ridge solar project is ultimately the successful integration of utility-scale ground mounted solar that includes a form of agriculture, thereby developing a template for utility-scale solar facilities in NYS to integrate agricultural practices into the operation of existing and future solar facilities and maintaining or improving agricultural production.

The integration of solar grazing and bee keeping at Morris Ridge has the potential to create additional value streams for the local farmers and apiarists, diversify the land productivity, improve or maintain agricultural production, and improve or maintain local biodiversity. The Project also seeks to identify and strengthen market opportunities for domestic lamb and honey enabled at solar facilities.

On a larger scale, this project aims to provide a template for similar integration at other large-scale solar sites in NYS and across New England that are either in operation or are yet to be constructed. This expanded integration can have a positive impact on the NYS economy, creating a domestic market for grass-fed, solar-raised lamb and solar honey products, increasing and diversifying land productivity while developing renewable energy projects, and supporting NYS in reaching its renewable energy targets by 2030 and 2040.

As mentioned above, EDF Renewables developed, owns, and operates the Arnprior Solar Project ("Arnprior"), a 23 MW commercial scale ground-mounted solar facility on 200 acres of land located near Ottawa, Ontario, Canada. EDFR pioneered the use of solar energy in Canada and doubled the grid-connected solar PV capacity in the country by building the Arnprior facility in 2009. Now in its 12th year of operation, the site is host to more than 300 sheep grazing under the solar panels, bees that produce 300 jars of honey annually, and milkweed for endangered monarch butterflies. These initiatives are a commitment to biodiversity, increasing land productivity, and are emblematic of EDFR's mission to lead the transition to a truly sustainable energy future by collaborating with the local communities, local agricultural businesses, and landowners. The experience gained at Arnprior will be directly applied to EDFR's portfolio of projects.

To demonstrate the EDFR team's commitment to making 'agrivoltaics' the combination of agriculture and solar photovoltaics happen, please visit the following materials that are available for public consumption via our project websites:

- Morris Ridge Agrivoltaic Solutions Video (presented by a sheep farmer who is experienced in solar grazing and invited to participate in our public meeting)
- Morris Ridge Open House town hall presentation (February 26, 2020) starting at 38:20 and presented by a sheep farmer who is experienced in solar grazing
- EDFR produced a corporate video highlighting its commitment toward sustainability practices such as solar grazing and hosting pollinators
- EDF Renewables Arnprior solar case study

Members of the EDF Renewables New York State development team are also members of and support the efforts of the American Solar Grazing Association. In fact, a member of our development team and the sheep farmer who is grazing the Arnprior solar site were guest speakers at the August 2020 Solar Grazing Call, the monthly information call hosted by the American Solar Grazing Association.:

8. Feedback from the Community

Virtual Meetings and Podcasts

During to the COVID-19 pandemic, EDFR needed to adapt its community outreach strategy to continue the important work of informing communities during challenging times when it was not possible to meet in public gatherings. The solution was to hold virtual community meetings where EDFR developers and experts shared updates on project development, studies conducted, land acquisition, our conversations with state and local officials, other consultations, and the Article 10 / Section 94-c permitting processes, including the anticipated application date and information regarding the future availability of local agency and community intervenor funds.

In another effort to make different types of media available to reach out to as many people in our communities as possible, EDFR developed a podcast series focused on educating the public about solar projects in development across New York state[2]. The podcasts explain the project background and benefits, answer frequently asked questions, and detail the importance of reaching out to the community

[2] www.ridgeviewsolar.com/multimedia

and building grassroots support. They include interviews with some of our participating landowners, the president of a local chamber of commerce, the beekeeper and farmer grazing sheep on one of our project sites in Ontario, Canada, our project developers, and energy storage safety experts. The podcasts are available on most popular podcast platforms[3] and also advertised on the radio in the local markets and on the radio station's websites.[4] Other podcasts are available on project websites, including for the Rich Road Solar project.[5,6] When awarded a contract with NYSERDA, EDFR will develop a new podcast focused directly on the Rich Road Solar project, and its impact on the community, featuring interviews with landowners, environmental groups, local businesses and other stakeholders.

EDF Renewables Feedback Opportunities

EDF Renewables understands the importance of building lasting meaningful relationships with the local communities in which their projects are located. EDFR uses project websites to easily share project details and other information like FAQs with the local community or any other person interested. EDFR also maintains project email addresses and 1-800 phone numbers, where interested parties can get in touch with a project representative at any time. In fact, to help substantiate EDF Renewables' commitment to stakeholder engagement, a full-time internal position was created in 2021 within the team for a community relations manager that has since been staffed by a resident of upstate New York.

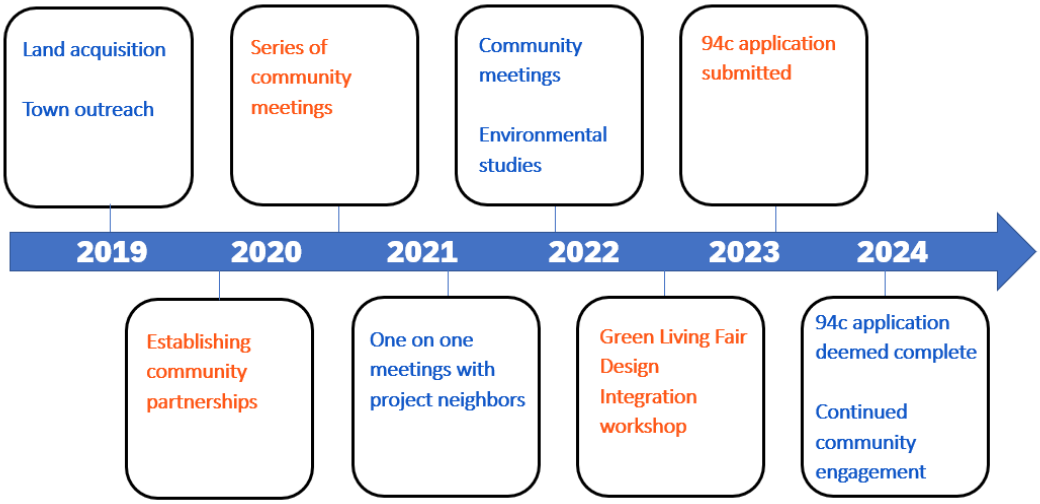
Realizing integration of solar projects and communities demands an understanding of our modern society, Community Relations Manager, Haylee Ferington, provides a unique vantage to this. A commitment to maximizing community benefits in a way that preserves and uplifts our rural communities runs through this work. Her previous role as a NYSERDA Clean Energy Community Coordinator prepared her to assist with an array of topics for local governments from local laws to resident education and engaging with green energy initiatives. Currently, Haylee serves as technical advisor to United Solar Energy Supporters, steering committee member and renewable energy working group chair for the Climate Solutions Accelerator of the Genesee Finger Lakes, and on her village parks committee. Haylee works to create an iterative and holistic process of feedback between EDF Renewable's New York development team and project communities through unique interaction opportunities like handmade coloring books and long-term partnerships like with local schools and NYSERDA Clean Energy Hubs.

Project Website[7]

Each of our solar projects has a user-friendly website containing information about specific benefits to both the community and our environment, and any information previously shared with the community, including public meeting information boards, newsletters, and permitting documents. Some websites include multimedia experiences, and all of them include information on how to communicate with our development team, provide feedback, or seek additional information. The Rich Road Solar Project can be found at www.richroadsolar.com

[3] https://podcasts.apple.com/us/podcast/edf-renewables-solar-podcast/id1533678839
[4] www.wxhc.com/podcast/edf-solar-podcast-episode-1-landowners/
[5] www.ridgeviewsolar.com/multimedia
[6] https://www.edf-re.com/project/rosalen-solar-project/multimedia/
[7] www.Richroadsolar.com

9. Planned Community Outreach Strategies and Activities



Future Outreach Strategies and Activities

Recognizing Rich Road Solar could be nearing the construction phase of its life, should a NYSERDA Tier 1 contract be awarded, future outreach strategies will involve keeping the community and municipality involved and informed of processes moving ahead, as well as continued conversations and feedback loops finalizing project designs to continue to integrate project into fabric of community.

As one of the first large scale solar projects to enter construction, Morris Ridge Solar, in Livingston County, provides EDFR holds some unique advantages to the pre-construction and construction phases of solar project development. Some important lessons learned are to consider google map directions when negotiating road use agreements, working with local communities such as Amish or Mennonite to understand and accommodate daily and religious travel patterns, and working with local liaisons to maintain a close and constant point of contact through this phase.

Leading up to construction, EDF Renewables will engage with the local community to provide a booklet of local services and hospitality businesses to distribute to the hundreds of construction workers who will work in the area for many months. This booklet will help to promote local businesses across St. Lawrence County in an effort to maximize opportunities to support the local economy. EDFR has implemented this booklet during 2023-2024 construction of the Morris Ridge Solar project and had much positive feedback, including local shops saying they have received more business directly from project contractors and subcontractors using the booklet, namely a local pizza shop saw upwards of 50 slices/day. When we consider this impact across a variety of sectors and businesses the collective impact is great.

Finally, through a combination of podcasts, webinars, mailers, public meetings, website updates or one on one conversations, the Project team will continue to communicate relevant information and collect meaningful feedback from all stakeholders to better integrate the Project within the community.

Community Opportunities/Capacity Building

EDF Renewables recognizes the importance of building community opportunities and capacity during the development, construction, and operation of the project and will continue in many of our engagement and outreach efforts as listed below:

- $50,000 Share the Sun Fund, community grant program with selections by local committee (for ten years)
- Annual 2x $2,000 Scholarships to students from Canton Central Schools (for ten years)
- $220,000 one-time payment to Adirondack North Country Association for energy efficiency upgrades for disadvantaged households in the town of Canton upon receipt of NYSERDA tier 1 contract
- Workforce development bringing virtual reality tour and a two-part training series to project communities with cost sponsored by EDFR in partnership with SUNY ESF and local unions
- Continued conversations and trainings surrounding agrivoltaics and sheep grazing at the Rich Road Solar site
- Continued work with SUNY Canton, Clarkson University, SUNY Potsdam and St Lawrence University to create academic partnerships and research opportunities at Rich Road Solar Center

EDF Renewables realizes community engagement is an iterative and long-lasting process and thusly cannot put an end date on our community engagement plan. As such- conversations, partnerships and outreach will continue so long as the Rich Road Solar Energy Center is in development, operation and beyond. Further, we recognize despite every effort to solicit feedback from the local community, there may be voices we have missed. EDFR encourages community residents to continue to reach out at newyorksolar@edf-re.com or 1-833-333-7369.