

Invenergy

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Date: January 31, 2024

Subject: Horseshoe Solar Energy Community Engagement Plan – RESRFP23 Bid

Dear NYSERDA bid reviewers,

In response to RESRFP23 Section 4.3.8 Community Engagement, Horseshoe Solar Energy LLC (HSS) is providing the enclosed Public Involvement Program (PIP) Plan that was prepared, submitted, and approved under Article 10 and was published to the DMM in February 2019. The outreach described in the attached PIP was carried out in full, as the Attachment 2 - PIP Tracking Report. In addition to the PIP Plan, HSS has prepared the following responses to supplement the submission requirements for Community Engagement:

- 1) Identify the Authority Having Jurisdiction (AHJ) and taxing School District, including local elected officials' names, contact information and tenure.

Refer to Appendix A of Attachment 1 HSS PIP Plan. Updated 2024 elected officials' information identified below:

Host Community	Position	Official	Contact Information
Town of Caledonia	Supervisor	Daniel Pangrazio	(585) 538-4927 ext. 124 supervisor@townofcaledonia ny.org
Town of Caledonia	Town Clerk	Seth Graham	(585) 538-4927 ext. 120 clerk@townofcaledoniany.org
Town of Caledonia	Highway Superintendent	Ron Beach III	(585) 538-2288 calhwy@frontier.com
Town of Rush	Supervisor	Daniel Woolaver	(585)53309058 supervisor@townofrush.com
Town of Rush	Town Clerk	Pamela Bucci	(585) 533-1312 pam@townofrush.com
Town of Rush	Highway Superintendent	David J. Kyle	(585) 533-1770 highway@townofrush.com

- 2) Detail outreach strategies and activities the Proposer has implemented to date and will use to engage stakeholders and interested parties, including affected agencies, and to encourage public involvement throughout the pre-award, development, construction, and operation phases (consistent with the Project Milestone Schedule), including methods of communication and specific channels the Proposer intends to use to disseminate Bid Facility information.

Refer to the updated Appendix D – PIP Tracking Report (Attachment 2 herein) which provides a chronological record of meetings to date. Since receiving its Siting Permit in December 2022, Horseshoe has been hosted open houses, been involved in multiple public hearings to discuss community benefits and has actively engaged with its host communities and stakeholders to incorporate comments on site design.

Applicability of the Climate Act goals regarding benefits to Disadvantaged Communities (DACs) that would be realized with the development and construction of the Bid Facility. HSS does not overlap with any Disadvantaged Communities (DACs) census tracts, but Livingston and Monroe Counties contain DACs. The PILOT payments approved by Livingston County and Monroe County, in addition to the IDA fees, have been identified to benefit DACs within each county, as these payments will benefit the entire county. Additionally, in our Monroe County PILOT agreement, Horseshoe has agreed to using 100% local labor during the construction of the Facility, with local labor coming from Monroe, Genesee, Livingston, Orleans, Ontario, Seneca, Steuben, Wayne, Wyoming, and Yates Counties. All, except Wyoming County, host Disadvantaged Communities. During the construction of the Facility, over 200 jobs will be created, and job earnings will total more than \$16M and result in over \$42M in local spending. During the Facility's operations, 18 jobs are anticipated to be created with over \$25M in local earnings.

HSS is a component of the Clean Path NY (CPNY) Tier 4 resource portfolio. Clean Path NY is establishing a \$270 million dollar Community Investment Fund (Fund) targeting DACs as detailed below. All of CPNY's generation projects and its transmission component each contribute financially to participate in supporting the Fund. Although CPNY is still in the process of launching the Fund, a dedicated team from CPNY is tasked with administering this initiative until it begins formal operations under the direction of an Executive Director and Board of Directors. In Attachment D of this bid submission, HSS's proportional allocation of financial contribution to the Fund is specified. The dollar amount shown in Attachment D is based on the Project's pro rata share of the total capital cost of the CPNY portfolio.

The Clean Path NY Community Investment Fund seeks to support initiatives around four key areas, with a focus on targeting investments in DACs:

- Enabling a just transition to the new clean energy economy through workforce development, apprenticeship, and local hiring programs;
 - Education programs at all levels focused on climate justice, energy literacy, and STEM;
 - Expanding access to health care in DACs in recognition that these frontline communities have, for too long, borne a disproportionate burden of the fossil fuel economy; and
 - Environmental stewardship and conservation, which is intended to support various local initiatives sought by communities across the State. These may include land conservation, habitat restoration, park rehabilitation or expansion, and in more urban communities, a focus on beneficial electrification of affordable housing, which carries with it co-benefits of further air quality enhancement, economic development opportunities, and job creation.
 - In alignment with CPNY's PSA NYSERDA will participate in developing the governance and structure of the Fund to ensure its alignment with the State's intended goals.
- 4) Planned frequency of public events and the anticipated duration, in years, of the public engagement events of community outreach, and strategies to ensure that public engagement events are widely attended by a representative cross section of host community residents. Public events and community outreach events are detailed in Section 6 of the Attached PIP.
- 5) Details of the direct benefits to the community the Proposer will advance, which may include a local ownership stake in the facility, reduced energy bills for those with homes or businesses in the Bid Facility's vicinity, and/or other direct benefits.

With the award of a contract under RESRFP -2023, HSS would provide \$90,000 in energy bill credits to local homes and businesses in the host towns.

- 6) [Details on past/planned engagement regarding payments in lieu of taxes \(PILOT\) agreements or host community agreements \(HCAs\).](#)

HCAs and RUAs have been executed in both host towns. PILOT agreements with both counties have been approved.

- 7) [Describe local interests and concerns, including identifying plans to thoughtfully build support for and respectfully responding to any opposition to the Bid Facility.](#)

HSS has conducted years of local stakeholder work to manage the small and vocal opposition group, Residents United to Save our Hometown. We worked with the Town of Rush and concerned residents to shift facility components to accompany viewshed concerns. HSS also worked with the Town of Rush to compromise on an Operations and Maintenance facility location, instead deciding to repurpose an existing pole barn to be used as the Facility's storage facility. In addition, in recognizing the cultural sensitivity of the Genesee Valley, HSS also worked collaboratively with the local tribes, including the Seneca Nation of Indians, to remove Project components in areas with heightened cultural sensitivity and form long-standing partnerships. HSS is currently working with the Seneca Nation of Indians on a signage project to interpret the ongoing Seneca history and stewardship of their homeland. At this stage of development, all concerns that could be addressed by design changes have been accommodated.

- 8) [Identify strategies the Proposer will use to mitigate concerns raised by the public regarding the Bid Facility. This may include visibility and viewshed Impact mitigation efforts, accommodations to co-locate agricultural activities, or other issues of importance to the host communities.](#)

Through more than two decades of energy development throughout the United States, Invenergy attributes its success in construction of projects by maintaining an active presence in the community, building relationships locally, and working diligently to defend the project against misinformation, legal challenges, and continuing to advance the economic benefit packages the project will offer the host communities. HSS has been issued a 94-C Siting Permit, which is required to construct the project, and has been conducting a rigorous community outreach effort since its inception. As part of HSS's 94-C compliance filings, HSS will submit public notification requirements concerning construction schedule and has filed a complaint management plan with the Office of Renewable Energy Siting (ORES). Furthermore, HSS has committed to consultation with the Town of Rush prior to finalizing any visual screening or visual impact mitigation plan and historic preservation mitigation plan. HSS has committed to working with the Town of Caledonia to meet annually to discuss Fire Protection Control and Safety with local Fire Chiefs, and to develop a Protection of Traveling Public and Pedestrian Safety Plan.

- 9) [Method for soliciting feedback and input from the public and affected agencies and the process for sharing feedback and responses publicly.](#)

Please Refer to Section 6 of the attached PIP. Additionally, HSS has prepared a complaint management plan that has been approved by ORES.

Please note that the attached PIP Plan is being submitted with the exception of original Appendices B-D in order to comply with RESRFP23 pagination requirements. Attachment 2. Updated Appendix D has been shortened from the original to show events from 7/2020 to present to conform to these pagination requirements.

Invenergy

Sincerely,



Marguerite Wells
Vice President, Renewable Development, Invenergy

Attachments: Attachment 1. HSS Public Involvement Program (PIP) Plan
 Attachment 2. Updated Appendix D – PIP Tracking Report

Public Involvement Program Plan

Horseshoe Solar

Livingston and Monroe County, New York

Case 18-F-0633

February 2019 (Rev. 2)

Prepared by:
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The logo for Invenergy, featuring the word "Invenergy" in a serif font. The "In" is in black, "ven" is in green, and "ergy" is in black.

Report Version

Version	Date	Title	Comments (purpose and track modifications)
1	Nov 2018	Public Involvement Program Plan – Horseshoe Solar	Submitted to DPS
2	Feb 2019	Public Involvement Program Plan – Horseshoe Solar	Update Project Area

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Abbreviations

DPS	Department of Public Service
FERC	Federal Energy Regulatory Commission
HSS	Horseshoe Solar
MW	Megawatt
MWh	Megawatt hour
NCF	Net Capacity Factor
NYCRR	New York Codes, Rules, and Regulations
NYPA	New York Power Authority
O&M	Operation and maintenance
PIP	Public Involvement Plan
PILOT	Payment in Lieu of Taxes
PSC	New York State Public Service Commission
PSS	Preliminary Scoping Statement

2 Introduction

Horseshoe Solar (HSS) plans to submit an application to construct a major electric generating facility under Article 10 of the Public Service Law. Pursuant to the rules of the New York State Board on Electric Generation Siting and the Environment (Siting Board), applicants proposing to submit an application to construct a major electric generating facility under Article 10 must submit a Public Involvement Program (PIP) Plan. The PIP must be submitted to the Department of Public Service (DPS) for review at least 150 days prior to filing a Preliminary Scoping Statement (PSS). This document is the PIP plan for the Horseshoe Solar Project (the Project), a solar energy facility described in Section 3

As required by 16 NYCRR § 1000.4, this PIP describes the steps HSS plans to take to inform, engage, and solicit input from the local community, general public, and other stakeholders. Stakeholder concerns, interests, local knowledge, and recommendations will be evaluated, addressed and considered by the Applicant and Siting Board.

3 Applicant and Project Description

3.1 Company Profile

Horseshoe Solar Energy LLC is an affiliate of Invenergy LLC (Invenergy). Invenergy is a utility-scale power producer developing, constructing, and operating renewable energy projects in the New York State energy market. Invenergy-owned energy projects operate under the supervision and regulatory authority of the New York State Public Service Commission (PSC) and the Federal Energy Regulatory Commission (FERC). Invenergy and HSS management offices are located in Chicago, Illinois. A regional office is in Ithaca, NY.

Invenergy and its affiliates have developed over a hundred renewable energy projects in the United States, Canada, and Europe including the following New York solar and wind farms:

- Shoreham Solar Commons, 24.9 MW, Town of Brookhaven, Suffolk County, NY.
- High Sheldon Wind Farm, 75 turbines in the Town of Sheldon, Wyoming County, NY.
- Orangeville Wind Farm, 58 turbines in the Town of Orangeville, Wyoming County, NY.
- Marsh Hill Wind Farm, 10 turbines in the Town of Jasper, Steuben County, NY.

Invenergy also has developed and constructed six utility-scale solar projects in North America, totaling 144 MW installed to date, including one co-located at one of its wind farms.

Invenergy provides wholesale electricity to the public using clean, renewable sources such as wind and solar. This furthers the State of New York's renewable energy policy, which requires 50% of the State's energy to come from renewable sources such as solar by the year 2030.

HSS intends to construct, own, operate, and maintain all components of the Project, except for the interconnection switchyard which will be constructed by HSS, and then transferred to National Grid, who will own, operate, and maintain the switchyard.

3.2 Project Summary

Project Facilities

HSS is planning the Project to have a maximum generating capability of 180 megawatts (MW) from solar panels located on land leased from owners of private property located in Caledonia, Livingston County and in Rush, Monroe County, New York (Figure 1).

Project facilities will include: solar panels and racking, access roads, inverters, buried and overhead electric collection lines, a Project substation, an operation and maintenance (O&M) building, and electrical interconnection facilities. The anticipated life of the project is approximately 35 years. HSS anticipates the interconnection facilities will include a 115-kV switchyard built adjacent to National Grid's Golah-Batavia 115 kV line. The project substation may be located adjacent to the solar panel area or may be co-located with the switchyard. Further engineering is required to determine this. The location of the POI and tentative T-line route will be added to the publicly available project descriptions when determined, expected to be about May 2019.

Invenergy is exploring various ways to co-locate agricultural uses of the land alongside the solar generation facility, such as harvesting forage for dairy feed and grazing sheep.

Energy Generation

HSS estimates the Project will operate at an annual net capacity factor (NCF) of 23.4%. This means the Project, if built at the maximum expected generating capacity of 180 MW, would generate approximately 369,000 megawatt hours (MWh) of energy per year. This will be enough electricity to meet the average annual consumption of 33,000 or 50,000 households, based on average annual household electric consumption of 10.8 MWh for the U.S. and 7.2 MWh for New York State, respectively (EIA, 2014).

Economic Benefits

The Project would have positive socioeconomic impacts of permanent O&M jobs, temporary construction employment, lease payments to landowners, and a new source of revenue for schools, fire departments, county government, and town governments. National Renewable Energy Laboratory's (NREL) Jobs and Economic Development Impact (JEDI) model estimates Project construction will create approximately 390 jobs with a payroll of \$28.6 million. To operate and maintain the Project, HSS estimates it will hire approximately 3 full time employees to be located at the site. The construction jobs would last approximately one year, and the operations and maintenance jobs would last for the life of the Project.

The Project plans to enter into PILOT agreements with the Livingston County Industrial Development Agency and the County of Monroe Industrial Development Agency in order to be subject to special district taxes. Specific estimates of amounts the Project might pay to different jurisdictions will depend on the Project layout and structure of the agreements. Based on similar arrangements at other solar projects in New York, HSS estimates a 180 MW project will generate approximately \$580,000 - \$700,000 per year in taxes and tax-related payments to the counties, towns, school districts, and fire departments that serve the parcels where HSS installs Project facilities and approximately \$690,000 to \$1.3 million per year to landowners leasing land to the Project.

3.3 Facility Site and Study Area

Figure 1 shows the regional Project location, preliminary Facility Site and preliminary Study Area for the Project. For purposes of this document, HSS defines these areas as follows:

- The Facility Site encompasses all parcels on which HSS expects to locate Project facilities. As shown in Figure 2, the Facility Site is centered around the eastern most portion of the Town of Caledonia, and extends eastward slightly into the Town of Rush in the southern portion of Monroe County. It includes approximately 3,800 acres of land.
- The Study Area is all areas within 2 miles of the Facility Site. While the Article 10 regulations suggest a five-mile study area radius, a smaller radius is appropriate for solar projects as they have a relatively low profile. The panels including racking will not exceed 15 feet high.

4 Public Involvement Program Overview

4.1 PIP Goals

HSS developed this PIP to ensure that concerns of individuals and groups, including local residents, with a potential interest in the Project and adjoining property owners (collectively referred to as stakeholders) are understood by Invenergy and the Siting Board and are incorporated and objectively considered in the Project design and review. Specific PIP goals are to:

- Identify groups and individuals with a potential interest in the Project;
- Ensure stakeholders and the general public are aware of the Project and are apprised of the methods and media by which they can keep informed about the Project's development and the Article 10 review process;
- Ensure stakeholders can relatively conveniently access information on the Project and the Article 10 review process;
- Engage stakeholders to understand their interests related to the Project, so that HSS can work with them to address their concerns and take them into account as the project moves forward; and
- Gather specific information from stakeholders that can be used to design objective and useful studies to be defined in the Preliminary Scoping Statement and included in a complete application for the Project.

4.2 PIP Schedule

HSS began conducting PIP activities in August 2018, and it will continue for the life of the project through decommissioning. Section 6.1 discusses specific PIP activities and their schedules, and Appendix C outlines the schedule and goals for each PIP event.

4.3 Stakeholder Involvement

Refer to Section 5 for discussion of stakeholder categories and identification.

Stakeholder Notifications

HSS will notify stakeholders of the important Project milestones listed below.

- Open Houses

- Preliminary Scoping Statement (PSS) Submittal
- Scoping consultations
- Application Submittal
- Public Hearing
- Siting Board Decision
- Commencement of Construction
- Commercial Operations Date

Stakeholder notifications will be by US Mail or email when that preference is expressed by the stakeholder. The only exception to this will be notification of the broad stakeholder categories for “Area Residents”. Area Residents that do not register as individual stakeholders will be notified of the above milestones by notices in local newspapers as discussed in Section 6.2.

Collection of Stakeholder Input

For stakeholder groups in sections 5.1-5.12 below, HSS will reach out to the point of contact to introduce the Project and offer to meet with the stakeholder group or point of contact. During stakeholder discussions HSS will introduce Invenergy, the Project, and the Article 10 review process, including intervenor funding. HSS will solicit specific feedback on issues that stakeholders want considered in the Project design or review. HSS will track this feedback in a comment log as discussed in Section 6.5.

Depending on the number of individual stakeholders, it may not be practical to contact each individually. As discussed in Section 6, HSS will develop materials, maintain a project website, and host events designed to inform landowners and residents. These materials, events, and the website will describe the Project and ways to submit input during the Article 10 review process.

Distribution of PSS and Application Documents to Stakeholders

HSS will notify stakeholders when the PSS and application are available on the Project website and at various document repositories. HSS does not intend to provide individual hard copies of these documents to Stakeholders except as required by 16 NYCRR §1000.5 and 16 NYCRR §1000.6.

5 Stakeholders

a. HSS has identified several categories of “stakeholders.” Overall, HSS relied on its experience developing other projects, review of PIPs filed for other projects, discussions with local officials, and the knowledge of its local representatives to identify potential stakeholders. Certain agencies are included as stakeholders as mandated by Article 10 regulations. Descriptions of stakeholder categories and the methods used to identify them follow. Appendix A lists the Project stakeholders and their contact information, as currently known by HSS. HSS will continuously update the stakeholder list to add or remove stakeholders as it identifies new interested, or uninterested, parties during PIP implementation. The most current list will always be used for notifications. PIP consultations will include information such as rules, regulations, or requirements that may be applicable to the proposed facilities at the identified project location; plans, policies and objective criteria that may be applicable to the proposed facilities at the identified Project location; resource concerns; and information needs.

Project outreach materials will contain instructions on how to be added to the stakeholder list. Individuals or organizations will be able to be added to the stakeholder list by calling a Project representative, calling a toll-free number, attending a public outreach event such as those for residents, or by sending an email to an address that will be posted on the Project website. Stakeholders can also be added to the list by US Mail, sent to Invenergy, 123 S. Cayuga St., Suite 201, Ithaca NY 14850.

5.1 Host Communities

HSS identified town boards and county boards representing any portion of the Facility Site by review of town and county boundary maps, and these boards are considered stakeholders. Points of contact will be the Town Supervisors, County Administrators, and the town clerks. Notices will be addressed to the full board, care of the point of contact, with the expectation that the point of contact will distribute the notices and information to the full board. HSS will meet with the points of contact prior to submittal of the PSS and will offer to meet with the full boards.

5.2 County Agencies

County agencies, other than the county legislature, with areas of responsibility potentially affected by the Project were identified by review of the county websites and consultation with the county planning departments. Note that HSS has identified the County Emergency Response Coordinators and Sheriffs as stakeholders and listed them under the category of "Emergency Responders."

5.3 State Agencies

Departments of New York State government were identified in the Article 10 regulations and by using Invenergy's experience in developing solar and wind projects in New York and by reviewing PIPs filed for these projects.

5.4 Federal Agencies

Agencies of the U.S. government were identified using Invenergy's experience in developing wind and solar projects in New York.

5.5 Legislative Representatives

Offices of the New York State Legislature, the U.S. Senate, and U.S. Congress representing the Study Area were identified by review of online district maps.

5.6 Highway Departments

County and town departments responsible for managing roads in the Study Area were identified by review of town and county boundary maps.

5.7 Schools

School districts serving parcels in the Study Area were identified by review of county tax maps.

5.8 Emergency Responders

Fire departments, emergency responders and police or sheriff departments serving parcels in the Study Area were identified by review of county tax maps.

5.9 Adjacent Municipalities

Towns, counties, villages, or other municipalities that are not host communities but are in the Study Area were identified by review of municipal boundary maps.

5.10 Utilities

Companies that own gas, electric, or communications infrastructure in the Study Area were identified by consultation with the County Planning Departments.

5.11 Public Interest Groups

Organizations that serve interests of the public in the Study Area were identified from discussions with the County Planning Departments and from the 2018 lists of county officials that includes county and town historians. This category includes business organizations, county and town historians, conservation or environmental organizations, and organized groups focused on use of the Facility Site for outdoor recreation and agriculture.

5.12 Airports and Heliports

Organizations operating FAA-registered airfields within 12 miles of the Study Area were identified by searching the FAA's database on licensed airports and heliports. There are three (3) private airports and two (2) publicly-accessible airports within 15 miles of the Facility Site. The Greater Rochester International Airport is approximately 15 miles from the Facility Site. These airports are included as potential stakeholders.

5.13 Adjacent Landowners

Owners of property within 2,500 feet of the proposed facility, or substation, or within 500 feet of other Project components (e.g., collection lines, etc.) are considered "adjacent landowners." When a Project layout is developed, HSS will identify these owners by review of tax records. HSS plans to develop a Project layout prior to submission of the PSS, will add adjacent landowners identified then to the stakeholder list and they will be included in project milestone notifications.

5.14 Area Residents

Residents of the Study Area that are not participating landowners or adjacent owners are included in the stakeholder list as one group. HSS will notify these residents of the Project individually by a widespread mailing to all unique addresses in the property tax rolls for the Study Area. The mailing will announce upcoming open houses, share website and contact information, and include instructions on how to register as a stakeholder, in case the residents are unable to attend the open house and register in person. At the open houses, attendees are encouraged to join the stakeholder list if they wish to continue to receive notice of future Project milestones (e.g., availability of the PSS, public hearing, etc.).

Going forward, HSS does not plan broad mailings to area residents that have not registered as stakeholders or been added as adjacent landowners. But HSS will continue to notify unregistered area residents of the Project through the public outreach activities described in Section 6, including notices in area newspapers.

5.15 Participating Landowners

Property owners that have entered into lease, easement, purchase option, or setback agreements with HSS that will allow construction of Project facilities on or near their property are considered "participating

landowners.” Participating landowners are included in the stakeholder list as one group, but not individually. Participating landowners will be added to the stakeholder list prior to submission of the PSS and will be included in project milestone notifications.

HSS’s private contracts with participating landowners contain provisions for HSS and landowners to work together on Project plans. These consultations are private discussions outside the scope of this PIP. In addition to private communications with HSS, participating landowners living in the Study Area will be notified of Project milestones and events in the same manner as the category of stakeholders described above as “Area Residents.”

6 Public Involvement Program Elements

6.1 PIP Activities, Schedule, and Goals

Appendix C lists the PIP activities HSS plans to conduct and the tentative schedule and goals for each activity. In addition to the initial meetings, PIP activities will be conducted throughout the Article 10 process, including after the PSS and Application have been submitted.

Stakeholder Consultations

Stakeholder consultations will be arranged as described in Section 4. HSS anticipates almost all stakeholders will be interested in a meeting or conference call. For any such stakeholder meetings or conference calls, one or more of the representatives identified in Section 6.2 will represent HSS.

Topics covered during stakeholder consultations will vary depending on the stakeholder’s role and potential impact. Possible topics include payment in lieu of tax agreements, highway agreements, local laws, emergency response requirements, intervenor funds, and environmental impacts. Meetings will also specifically cover potential synergies or conflicts with stakeholder plans. Content of stakeholder consultation meetings will be documented in the PIP Tracking Report and comments received will be recorded as discussed in Section 6.5.

As appropriate, HSS will conduct subsequent meetings to answer specific questions, and to discuss studies, mitigation, or other strategies that could address stakeholder concerns.

Appendix B provides a tentative schedule of initial consultations.

Town Board Meetings

HSS will present at regularly-scheduled monthly board meetings of the local town boards in the host towns of Caledonia and Rush. HSS will also request to present the project to the County Legislatures at one of their regularly-scheduled meetings.

As part of the presentation given at each meeting, HSS introduces Invenergy, the Project, and the Article 10 process, including Intervenor Funding, and will respond to questions from the board and members of the public.

HSS representatives will be available to attend future town board meetings as requested by the boards and will offer to attend town board meetings in adjacent communities in the Study Area.

The above meetings and any future presentations at town board meetings will be documented in the PIP tracking report.

Open House

HSS will hold an open house style public meeting prior to or shortly following submittal of the PSS. At least two representatives of the HSS's development team will be present at the meeting. The meeting will feature poster displays on the Project, solar energy, and the Article 10 review process. A brief presentation by one of the HSS representatives will start the meeting and then ample time will be allowed for review of displayed materials and one-on-one discussions with the HSS representatives.

The Open Houses will be held at JW Jones Hall, 366 Leicester Rd, Caledonia, NY. They will be held on March 20, 2019 from 1-3pm, and from 5:30-7:30 pm on the same day.

The open house will be advertised at town board meetings, by a mass mailing to names listed in the tax rolls for the Study Area, on the Project website, and in the most commonly read local papers.

6.2 Communication Tools

Project Representatives

Invenergy has two representatives available to implement this PIP and answer questions from stakeholders:

Marguerite Wells
123 S. Cayuga St Suite 201
Ithaca, NY 14850
Manager, Renewable Development
mwells@invenergyllc.com
(607) 330-0399

Eric Miller
120 N. Lee St.
Falls Church, VA 22046
Vice President, Renewable Development
emiller@invenergyllc.com
(301) 610-6413

Contact information for local representatives is posted on the project-specific website. Additionally, this information will be made available at stakeholder consultations, town board meetings and open houses.

Toll-Free Number

Invenergy also maintains a toll-free number (1-866-378-4580) connected to an automated voicemail that it will advertise on the Project website and all PIP mailings and will monitor for questions on the Project. This line operates even during non-business hours. This line is not dedicated, so callers should identify the project they are calling about. HSS will make reasonable efforts to confirm receipt within one day of an inquiry and provide substantive responses within three business days.

New York State Office

HSS has an office in Ithaca, New York, at address 123 South Cayuga Street, Suite 201, Ithaca NY 14850. Mail may be addressed to this office. HSS's Project Developers manage the local office and are able to answer questions on the Project. The office maintains regular business hours, 9am-5pm, Monday through Friday. Meetings in the vicinity of the project may be scheduled by appointment.

Website

HSS has established a user-friendly website dedicated to the Project that is written in plain English (www.HorseshoeSolar.com). HSS will update the website as the Project develops and more information becomes available. When available, the following items will be posted on the website:

- Project description and location;
- Project benefits and need;
- Project layout maps;
- Project milestones and timeline
- Project contact information, including an email address and a telephone number local to the Facility Site;
- Summary of the Article 10 process;
- Summary of the intervenor funding process with instructions on how to apply;
- Addresses of local document repositories;
- Links to the Article 10 siting board webpage and to case-specific documents file for the Project;
- Notices for public outreach events, filings, and public hearings;
- PIP tracking report,
- Publications or educational materials presented at the open house(s) or distributed to stakeholders;
- Instructions on how to join the stakeholder list.
- Complaint procedures

Document Repositories

HSS will maintain hard copies of the PIP, the PSS, and the application, plus any additional outreach or informational materials, at the following locations:

- Caledonia Library 3108 Main St., Caledonia, NY
- Caledonia Town Hall, 3109 Main St, Caledonia, NY
- Avon Free Library 143, Genesee St., Avon NY
- Rush Town Hall, 5977 East Henrietta Road Rush, New York 14543
- Rush Public Library, 9756, 5977 E Henrietta Road, Rush, NY

Stakeholder Notifications

HSS will notify stakeholders of Project milestones as discussed in Section 4.3.

Notifications to the General Public

In addition to its direct notifications to Project stakeholders and the general mailing described in Section 5.14, HSS will publish notices as required by the Article 10 regulations, including posting notices of PSS and application filings on the Project website and in the following newspapers of record for the host community towns:

- Livingston County News
- Henrietta Post
- Rochester Democrat and Chronicle

- Genesee Valley Pennysaver

6.3 PIP Materials

For initial presentations given at town board meetings and at open house(s), HSS will present information on HSS, the Project, and the Article 10 process including intervenor funding. Presentations will contain maps, timelines, and other Project-specific material developed by HSS. Materials and mailings will also indicate how to become a stakeholder, project staff contact information, and information sources.

PIP materials will cover some solar power basics and unique aspects of HSS and the Project, and the Article 10 review process.

At the open house, HSS will have poster board displays on topics such as:

- Environmental, emissions offset, and fuel offset benefits of solar energy,
- Solar panel dimension(s) and technology detail;
- Project schedule;
- Economic benefits of the Project to the local economy;
- Facility Site, Study Area, viewshed, safety, and proposed solar panel layouts when available.
- Article 10 process and intervenor funding

For meetings following the open house, HSS anticipates the items of most interest will be maps showing proposed locations of project facilities. HSS will generate such maps in large format for display as part of its presentations after the open house.

HSS has developed materials on the above topics using information from its solar panel suppliers and its knowledge of the Article 10 process. Versions of these materials are available on the Project website.

6.4 PIP Tracking Report

HSS will maintain a log documenting PIP activities, meetings, and consultations. For each event, the log will document the event date, location, attendees, summary of topics discussed, and any follow-up steps.

Every three months, HSS will file the PIP tracking report with the Secretary to the Siting Board and post it on the Project website. Stakeholder mailings will be documented with affidavits filed with DPS.

6.5 Comment Tracking

HSS will maintain an internal log of comments or questions that cannot be answered in a few words or that may have interest to a broad audience. HSS will refer to this comment log in development of the PSS and application to ensure that comments are being adequately addressed.

7 Environmental Justice Areas

Figure 1 maps the Facility and the nearest potential environmental justice areas (PEJA). To identify locations of potential environmental justice communities, HSS used the NYSDEC digital tool called GIS Tools for Environmental Justice. This tool identifies areas where significant portions of the population are at or below the federal poverty level. Using census block groups from the 2000 census, the PEJA tool identifies areas that meet one or more of the following thresholds:

- 51.1% or more of the population in an urban area reported themselves to be members of minority groups; or
- 33.8% or more of the population in a rural area reported themselves to be members of minority groups; or
- 23.59% or more of the population in an urban or rural area had household incomes below the federal poverty level.

There are no Potential Environmental Justice Areas in the Facility Site, but the following is within the Study Area:

- Census Block Group ID 360510302013 is located approximately 1.2 miles south of the Facility Site in Livingston County between Avon and Geneseo. The area is rural in nature, and the 2000 census statistics show that 7.57% are minorities and 48.97% are below the federal poverty level.

As no Project Infrastructure is anticipated within the PEJA, and construction and operation impacts will be localized to the Facility Site, no impacts are anticipated. HSS will nevertheless assess whether disproportionate impacts to the PEJA are expected in the Article 10 Application.

EPA has an Environmental Justice mapping tool as well, <https://ejscreen.epa.gov/mapper/>. This tool indicates that for all EJ Index criteria, from particulate matter to wastewater discharges, the 10-mile radius around the Facility Study ranks 40% percentile or lower in both state and national thresholds, placing the area low on the EPA index of EJ criteria.

8 Language Access

Article 10 regulations require the PIP to identify any language other than English spoken (1) by 5,000 or more persons, according to United States Census data, residing in any 5-digit zip code postal zone in which any portion of such zone is located within the Study Area; and (2) by a significant population of persons residing in close proximity to the proposed facility, alternative locations, or interconnections.

Table 1 lists the 5-digit zip codes extending into the Study Area and the most prevalent non-English languages spoken. As shown by Table 1, there are no zip codes touched by the Study Area where 5,000 or more people do not speak English. The Spanish-speaking and Other Indo-European-speaking numbers are included in the Non-English totals and are a sub-set thereof.

Table 1. Primary Language Spoken at Home by Town

	English	Non-English	Spanish	Other Languages
Caledonia	3853	98	23	75
Rush	3183	115	45	70

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Appendix A

Stakeholder List

Host Communities	
Town of Caledonia Laurie Sattora, Town Clerk Daniel Pangrazio, Town Supervisor 3109 Main Street Caledonia, NY 14423	Livingston County Ian M. Coyle, County Administrator David L. LeFeber, Chairman of the Board Livingston County Government Center 6 Court St., Rm 302 Geneseo, NY 14454
Town of Rush Shivaun Featherman, Deputy Town Clerk Cathleen Frank, Town Supervisor 5977 East Henrietta Road Rush, NY 14543	Monroe County Adam Bello, County Clerk Cheryl Dinolfo, Monroe County Administrator, 39 W. Main St., 101 County Office Building Rochester, NY 14614
Document Repositories	
Caledonia Town Hall 3109 Main Street Caledonia, NY 14423	Caledonia Public Library 3108 Main Street Caledonia, NY 14423
Rush Town Hall 5977 East Henrietta Road Rush, NY 14543	Rush Public Library 9756, 5977 E Henrietta Road Rush, NY 14543
Avon Free Library 143 Genesee St. Avon, NY 14414	
County Agencies	
Livingston County Industrial Development Agency Philip S. Brooks, Chairman 6 Court St., Rm 306 Geneseo, NY 14454	County of Monroe Industrial Development Agency Jeffrey Adair, Executive Director City Place, 50 West Main Street, Suite 8100 Rochester, NY 14614-1293
Livingston County Planning Department Angela Ellis, Director Heather Ferrero, Deputy Director 6 Court St., Rm 305 Geneseo, NY 14454	Monroe County Planning Department 8100 City Place 50 W. Main St. Rochester, NY 14614
Livingston County Soil and Water Conservation District Robert Stryker, District Manager 11 Megan Dr., Suite 2 Geneseo, NY 14454	Monroe County Soil and Water Conservation District 145 Paul Road Building #5 Rochester, NY 14624
Adjacent Municipalities	
Town of York Gerald L. Deming, Supervisor 2742 Chandler Rd. Piffard, NY 14533	Town of Avon David L. LeFeber, Supervisor 4910 Littleville Rd. Avon, NY 14414
Town of Wheatland P.O. Box 15 22 Main Street Scottsville, New York 14546	Village of Avon 74 Genesee Street Avon, NY 14414
Village of Caledonia 3095 Main Street Caledonia, NY 14423	
Schools	
Avon Central School District Aaron Johnson, Superintendent of Schools	Caledonia-Mumford Central School District Robert Molisani, Superintendent

191 Clinton St. Avon, NY 14414-1495	Christine Thompson, Secretary to the Superintendent 99 North Street Caledonia, NY 14423
Rush-Henrietta Central School District 2034 Lehigh Station Rd Henrietta, NY 14467	

Airports	
Greater Rochester International Airport Andrew G. Moore, Interim Airport Director 1200 Brooks Ave Rochester, NY 14624	Smiths Land Base Paul Smith 438 Five Points Rd. Honeoye Falls, NY 14472
Lakeville John Bodine 3601 West Lake Road Geneseo, NY 14454	Geneseo Airport John Swanson 3489 Big Tree Lane, P.O. Box 185 Geneseo, NY 14454

Emergency Responders	
Livingston Office of Emergency Management Kevin Niedermaier, Director 3360 Gypsy Lane Mt. Morris, NY 14510	Monroe Office of Emergency Management Tim Kohlmeier 1190 Scottsville Road, Suite 200 Rochester, NY 14624
Livingston County Sheriff's Office Thomas J. Dougherty, Sheriff 4 Court Street Geneseo, NY 14454	Monroe County Sheriff's Office Todd K Baxter, Sheriff 130 Plymouth Ave. Rochester, NY 14624
Rush Fire District Jim McNeil, District Chief 1971 Rush Mendon Rd. Rush, NY 14543	Caledonia Fire District Mike Churchill, Fire Chief 3089 Main St. Caledonia, NY 14423

Federal Agencies	
US Army Corps of Engineers Buffalo District 1776 Niagara St. Buffalo, NY 14207	US Federal Aviation Administration Carmine Gallo, Eastern Region Administrator 1 Aviation Plaza Jamaica, NY 11434
National Telecommunications and Information Administration Karl B. Nebbia, Associate Administrator, Office of Spectrum Management 1401 Constitution Avenue, N.W. Washington, DC 20230	US Fish and Wildlife Service Tim Sullivan, 3817 Luker Road Cortland, NY 13045

Highway Departments	
Livingston County Highway Department Donald Higgins, Superintendent Elaine Szoczei-Brehm, Highway Administrative Manager 4389 Gypsy Lane Mt. Morris, NY 14510	Monroe County Department of Transportation 6100 City Place 50 W. Main St. Rochester, NY 14614
Caledonia Highway Department Mark Schroeder, Superintendent 3109 Main St. Caledonia, NY 14423	Rush Highway Department Mark David, Highway Superintendent 804 Rush West Rush Rd. Rush, NY 14543
Town of Wheatland Highway Department (adjacent) 1822 Scottsville Mumford Rd, Scottsville, NY 14546	Town of York Highway Department (adjacent) 2712 Short Street York, NY 14592
Avon Highway Department (adjacent) Tom Crye, Highway Superintendent Dick Rumfola, Deputy Superintendent 5390 Agar Road	

Avon, NY 14414	
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Legislative Representatives	
State Senator, 59th District Patrick M. Gallivan District Office: 2721 Transit Rd., Suite 116 Elma, NY 14059	US Senate, State of New York Charles E. Schumer, Senator Regional Office: 100 State St., Rm 3040 Rochester, NY 14614
US House of Representatives 27th District Chris Collins, Congressman 128 Main Street, Unit 2 Geneseo, NY 14454	Livingston County Legislature Eric R. Gott P.O. Box 43 Livonia, NY 14487
Member of Assembly, 133rd District Joseph Errigo District Office: 30 Office Parkway Pittsford, NY 14434	US Senate, State of New York Kirsten E. Gillibrand, Senator Regional Office: 100 State St., Rm 4195 Rochester, NY 14614
State Senate, 55 th District Richard Funke District Office: 230 Packett's Landing Fairport, NY 14450	Monroe County Legislature, District 5 (Mendon, Rush, Henrietta, Pittsford) Karla Boyce, Legislator 15 Charleston Drive Mendon, NY 14506

Public Interest Groups	
Genesee Valley Conservancy Benjamin Gajewski, Exec. Director One Main St., P.O. Box 73 Geneseo, NY 14454	Livingston County Farm Bureau Joe Swyers, President 9607 Kenney Rd Dansville, NY 14437
Monroe County Farm Bureau Jenny Lundberg, President 29 Liberty St, Suite 212 Batavia, NY 14020	Livingston County Area Chamber of Commerce & Tourism, Laura Lane, President 4635 Millennium Drive Geneseo, NY 14454
Livingston County Environmental Management Council c/o Livingston County Planning Dept. 6 Court Street Room 305 Geneseo, NY 14454	Livingston County Agriculture and Farmland Protection Board c/o Livingston County Planning Dept. 6 Court Street Room 305 Geneseo, NY 14454
Livingston County CCE 3 Murray Hill Dr, Mt Morris, NY 14510	Avon Chamber of Commerce 74 Genesee St., Avon, NY 14414
Greater Monroe County Chamber of Commerce Edison Guzman, Board President PO Box 300, Monroe, NY 10949-0330	Monroe County Environmental Management Council Rachel Johnson 111 Westfall Road, Room 916 Rochester, NY 14620

Public Interest Groups (Outdoors Clubs)	
Livingston County Federation of Sportsmen's Clubs Marc Osypian, President 2551 Lakeville Rd. Avon, NY 14414	Monroe-Chester Sportsmen's Clubs Roy Zucca, President 224 Gibson Hill Road Chester, NY 10918
Genesee Valley Audubon Society PO Box 15512 Rochester, NY 14615	The Nature Conservancy 274 N. Goodman Street Suite B261 Rochester, NY 14607
Caledonia Trailblazers Doug Hill, President P.O. Box 161 Caledonia, NY 14423	Friends of the Genesee Valley Greenway PO Box 42 Mt Morris, NY 14510

Public Interest Groups - Historians	
Livingston County Historian Amie Alden 5 Murray Hill Drive Mt. Morris, NY 14510	Monroe County Historian Carolyn Vacca, Historian Lavery Library, St. John Fisher College 3690 East Avenue Rochester, NY 14618
Livingston County Historical Society and Museum Anna Kowalchuk, Museum Administrator 30 Center St. Geneseo, NY 14454	
Caledonia Historian Eileen LaFave-Bickford 3109 Main St. Caledonia, NY 14423	Rush Historian Susan Mee, Town Historian 5977 East Henrietta Road Rush, NY 14543

State Agencies and Authorities	
NYSERDA Alicia Barton, President and CEO Doreen Harris, Program Manager, Large Scale Renewables 17 Columbia Circle Albany, 12203	NYS Department of Environmental Conservation, Division of Environmental Permits Basil Segos, Commissioner Chris Hogan, Chief, Major Project Management 625 Broadway, 4th Floor Albany, NY 12233
NYS Department of Environmental Conservation, Region 8 Offices Mke Wasilco, Biologist 6274 E. Avon-Lima Rd Avon, NY 14414-9519	NYS Department of Public Service, Hon. Kathleen Burgess, Secretary Andy Davis, Utility Supervisor James Denn, Public Information Officer Lorna Gillings, Outreach Contact 3 Empire Plaza Albany, NY 12233
NYS Department of Health Howard Zucker, Commissioner, Nathan Graber, MD, MPH, Director Ctr. for Env. Health, Corning Tower, Empire State Plaza, Room 1619 Albany, 12237	New York Independent System Operator Jessica Gamache, Interconnection Project Coordinator 10 Krey Blvd. Rensselaer, NY 12144
NYS Division of Homeland Security and Emergency Services John P. Melville, Commissioner 1220 Washington Avenue, State Office Campus, Building 7A Suite 710 Albany, NY 12242	NYS Department of Transportation Kevin Bush, Director, Region 4 1530 Jefferson Road Rochester, NY 14623
NYS Department of Transportation Paul Karas, Acting Commissioner 50 Wolf Road Albany, 12232	NYS Department of Agriculture and Markets Richard Ball, Commissioner 10B Airline Drive Albany, NY 12235
NYS Office of General Services RoAnn Destito, Commissioner 41st Floor, Corning Tower, Empire State Plaza Albany, 12242	NYS Office of Parks, Recreation and Historic Preservation Rose Harvey, Commissioner John Bonafide, Director, Technical Preservation Bureau PO Box 189 Waterford, NY 12188
NYS Department of State Rossana Rosado, Secretary One Commerce Plaza, 99 Washington Avenue Albany, NY 12231	Empire State Development Corporation Howard Zemsky, President and CEO 625 Broadway Albany, New York 12245

Utilities	
Frontier Communications Main St. Red Creek, NY 13143	National Grid One Metrotech Center, 16th Floor Brooklyn, NY 11201

Spectrum Communications 2620 W.Henrietta Rd Rochester, NY 14623	Buckeye Partners, L.P. 5 Tek Park, 9999 Hamilton Blvd. Breinigsville, PA 18031
Water and Sewer Authority, Livingston County Michelle Baines, Executive Director 1997 D'Angelo Drive, P.O. Box 396 Lakeville, NY 14480	Monroe Water Authority 475 Norris Drive Rochester, NY 14610-0999
Lenape Resources, Inc. 9489 Alexander Road Alexander, NY 14005	

