TRAIL ROAD BESS FACILITY

EMERGENCY RESPONSE PLAN (ERP)

Rev 4.0 | September 2025

Summary

This document serves as the Preliminary Emergency Response Plan (ERP) for the Trail Road energy storage facility to be located in Richmond, Ontario, Canada.

Only an ERP with input from the local first responders can provide true guidance and pertinent information regarding the roles, responsibilities, and chain of communication and command of the System Owner / Operator, Property Owner, and other required Subject Matter Experts (SMEs) for preparing for, and safely responding to, a fire, overpressure event, or other battery-related incident requiring a public safety response at the energy storage facility.

LIFE SAFETY SHALL BE THE HIGHEST PRIORITY DURING ANY TYPE OF EVENT.

Prepared For:

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EMERGENCY CONTACT INFORMATION

IN CASE OF EMERGENCY CALL 911

LOCAL FIRE DEPARTMENT

Ottawa Fire Department, Station 47

Phone: (613) 580-2860

Address: 3559 Greenbank Road
Nepean, ON K2J 0V1
Canada

LOCAL POLICE DEPARTMENT

Ottawa Police Service

Phone: (613) 236-1222

Address: 245 Greenbank Road
Nepean, ON K2H 8K9
Canada

HOSPITAL EMERGENCY ROOM

Queensway Carleton Hospital

Phone: (613) 721-2000

Address: 3045 Baseline Road
Ottawa, ON K2H 8P4

LOCAL HEALTH FACILITY

Rideau Valley Health Centre

Phone: (343) 644-9877

Address: 1221 Greenbank Rd
Nepean, ON K2J 5V7

LOCAL BURN CENTER

Sunnybrook Health Sciences Centre : Ross Tilley Burn Centre

Phone: (416) 480-6814

Address: 2075 Bayview Avenue
Toronto, ON M4G 0A2

SYSTEM OWNER / OPERATOR

XXXXXXXXXXXXXXXXX

Phone: (XXX) XXX-XXXX

Address: XXXXXXXXXXXXX
XXXXXXXXXXXXX

REMOTE MONITORING FACILITY

Remote Monitoring Facility

Phone: TBD

SUBJECT MATTER EXPERT (SME)

Subject Matter Expert (SME)

Phone: TBD

Address:

ENERGY STORAGE SYSTEM INFORMATION

TRAIL ROAD ENERGY STORAGE FACILITY

Site Address: 4186 William McEwen Drive
Richmond, ON K0A 2E0

GPS Coordinates: 45°12'52.11"N 75°45'1.17"W

ENERGY STORAGE SYSTEM

Make / Model: Sungrow PowerTitan 2.0
Total MW / MWh: 150MW / 600 MWh
 # Units: 156

FIRE DETECTION SYSTEMS

- Two (2) heat detectors per ESS enclosure
- Four (4) smoke detectors per ESS enclosure
- One (1) H2 gas detector per ESS enclosure
- One (1) CO gas detector per ESS enclosure
- Six (6) Deflagration Panels

PROJECT INFORMATION

Project Name	**Trail Road Emergency Response Plan**
Project No.	25-20150
Prepared For	Evolugen 41 Victoria St. Gatineau, QC J8X 2A1 Canada
Revision No.	Rev 4.0
Document No.	
Date of Issue	7/7/2025

REVISION HISTORY

Revision No.	Date of Issue	Substance of Change
0.1	5/2/2025	Edits based on customer comments
1.0	5/27/2025	Additional edits
2.0	7/3/2025	Edits based on OFS comments.
3.0	7/7/2025	Additional edits based on customer comments
4.0	9/26/2025	Updated for ZBLA Application

Note 1: *The information in this document is subject to change while in DRAFT status and may be modified in the event of modifications to equipment or other factors affecting the design of the system or site.*

Note 2: *During the operating life span of the project, it is expected that this document shall be reviewed annually, and that all pertinent information shall be appropriately updated as necessary. This ERP is compiled based upon current design and usage at the time of this writing.*

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Upon acceptance of this "as designed" interim draft, which may be made public as an "*as designed release*," ESRG shall treat this document as ready for release but shall not mark the document as "*as-built final*" until ESRG can confirm, via personnel on site, that the system, "*as-built*" aligns with the reviewed and reported design.

The industry, related technology, and best practices are rapidly evolving and changing regularly. It has been observed that changes often occur to a project through the construction phase, be they to the battery itself or to the balance of system. As such, an "*as-designed release*" document should be considered final only if no changes are made to the system from design to construction to completion. If it is 100% accurate it will be released unchanged. However, should ESRG encounter deviations from the design, the document will be amended accordingly per the design changes and then released as a final document.

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ACRONYMS

AR	Arc-Rated
BMS	Battery Management System
E-Stop / EPO	Emergency Stop / Emergency Power Off
ERP	Emergency Response Plan
EMS / ESMS	Emergency Management System / Energy Storage Management System
ERG	Emergency Response Guide (generic, product-level emergency response guide)
ESRG	Energy Safety Response Group
ESS / BESS	Energy Storage System / Battery Energy Storage Management System
FACP	Fire Alarm Control Panel
IC	Incident Commander
ICS	Incident Command System
kW	Kilowatt(s)
kWh	Kilowatt-hour(s)
LFL / LEL	Lower Flammability Limit / Lower Explosive Limit
LFP	Lithium Iron Phosphate
MW	Megawatt(s)
MWh	Megawatt-hour(s)
NOC	Network Operations Center
O&M	Operations and Maintenance
PCS	Power Conversion System
PPE	Personal Protective Equipment
SCBA	Self-Contained Breathing Apparatus
SDS	Safety Data Sheets
SME	Subject Matter Expert
SOC	State of Charge
UICS	Unified Incident Command System
UFL / UEL	Upper Flammability Limit / Upper Explosive Limit

TABLE OF CONTENTS

TABLE OF FIGURE

TABLE OF TABLES

1 INTRODUCTION

1.1 Scope and Purpose

This Emergency Response Plan (ERP) is provided for the Trail Road Battery Energy Storage System (ESS or BESS) facility located at 4186 William McEwen Drive, Richmond ON, K0A 2E0, Canada. The purpose of this document is to provide guidance and pertinent information regarding the roles, responsibilities, and chain of communication and command of the System Owner / Operator, Property Owner, and other required Subject Matter Experts (SMEs) for preparing for, and safely responding to, a fire, explosion, or other battery-related incident requiring a public safety response at the energy storage facility.

The Operations and Maintenance (O&M) Manager for the project is an employee of XXXXXXXXXXX. "On-site personnel" include all individuals on the facility property who are direct employees of the Owner / Operator or affiliated contractors. The Owner / Operator and contractors are similarly responsible for establishing and maintaining contractor-specific Emergency Response Plans and reporting procedures that will work in conjunction with the overall energy storage facility plan.

Life safety shall be the highest priority during any type of event.

1.2 Activation

This Emergency Response Plan shall be activated during any emergency response to a battery-related incident on-site.

1.3 Incident Command System (ICS)

The System Owner / Operator, Subject Matter Experts, Remote Monitoring Facility staff, and all energy storage system related personnel shall comply with the orders of the Incident Commander (IC) and the command staff.

1.4 Operations and Maintenance (O&M)

Operations and maintenance procedures for the energy storage facility and associated equipment is outside the scope of this document.

Please refer to manufacturer Operations and Maintenance manuals for all associated equipment related to the site prior to beginning any work on this installation located in Appendix C of this document.

1.5 ERP Update Process

1.5.1 Issuance and Revisions

Dates for draft issuance, revisions, and final issuance of this ERP are provided on Page 5 of this document.

Updates to this ERP based on any major material changes to the installation are the responsibility of the System Owner / Operator and other relevant entities required.

1.5.2 Annual Review

During the operating life span of this installation, it is expected that this document shall be reviewed annually, with all pertinent information updated as required.

1.5.3 Plan Retirement

All decommissioning procedures should be performed by trained and knowledgeable persons in alignment with the Decommissioning Plan provided for this installation. Decommissioning shall be performed under supervision of the System Owner / Operator responsible for this installation.

Notification of decommissioning shall be provided to the Fire Department by the System Owner / Operator responsible for this installation.

1.6 Fire Department Training

Initial and recurring training shall be provided to local first responders and emergency response personnel. Training may also include a site visit to the facility where a walk-through of the site shall take place. A log of all training shall be maintained by the owner/operator, or their designee, and provided to the AHJ when requested.

2 SITE OVERVIEW

2.1 Site Location

The Trail Road BESS Facility will be located on a 70-acre parcel of land located at 4186 William McEwen Drive, Richmond, ON, K0A 2E0, Canada. The site will consist of 156 Sungrow PowerTitan 2.0 BESS enclosures as depicted in Figure 1 below.

The site is located in a largely rural area, about 24 km south of Ottawa. It is surrounded by forest and open/farm land on three sides, with the remaining side bordered by William McEwen Drive. Route 416/ Veterans Memorial Highway runs directly beside William McEwen Drive.

Figure 1 – Site Layout

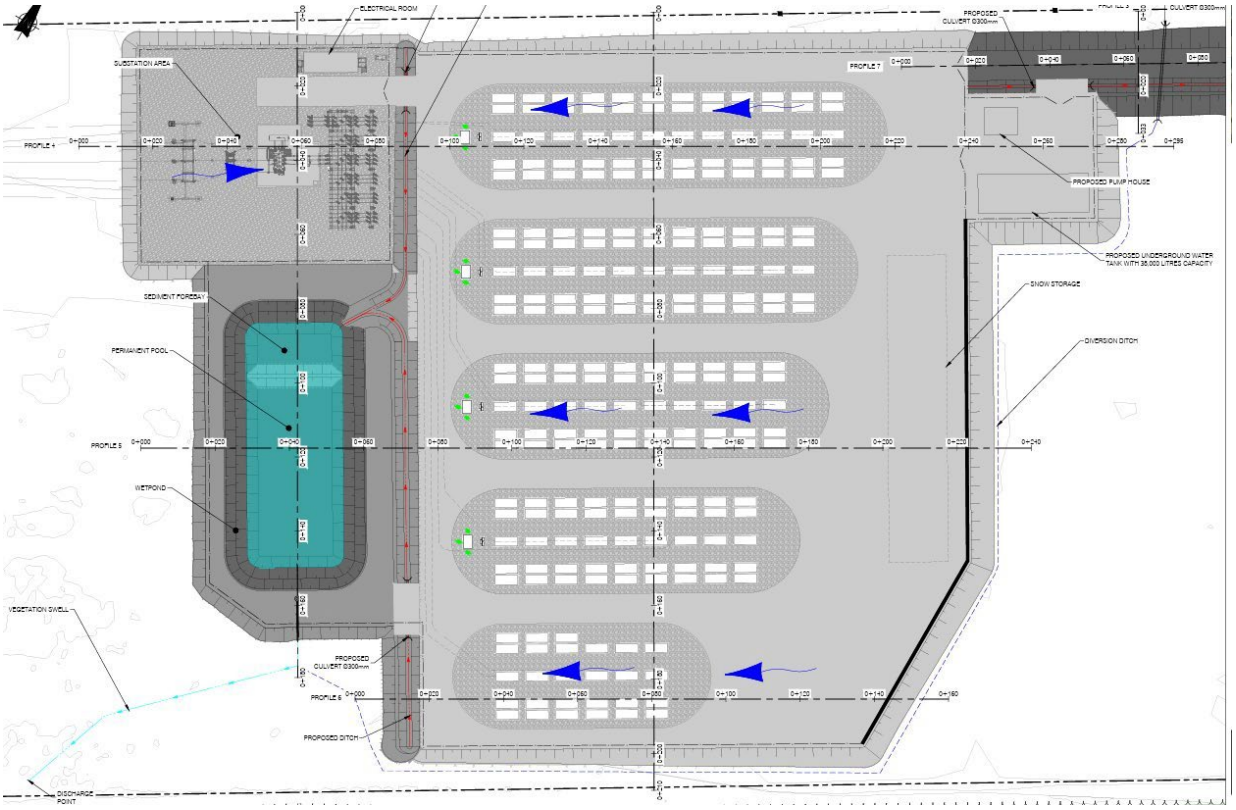


Figure 2 – Aerial View

SITE INFORMATION		
Site Address:	4186 William McEwen Drive Richmond ON, K0A 2E0 Canada	
GPS Coordinates:	45°12'52.11"N 75°45'1.17"W	**Special Flood Zone:** No

2.2 Fire Department Staging Area

Fire Department staging area and safety assembly area for any onsite personnel is located west of the BESS perimeter fence line.

It is recommended that fire department staging areas are established at angles relative to the sides of the ESS enclosures to reduce potential impact from flying projectiles or debris in the event of an explosion event.

The Fire Department should not attempt to enter the BESS fence line prior to incident size-up and coordination with the facility's designated subject matter expert (SME), or as otherwise determined at the ultimate discretion of the Incident Commander.

2.3 First Responders Station

A First Responder's Station, housing with physical copy of the Emergency Response Plan (ERP), operational permits, O&M logs, and product manuals, will be east of the BESS just outside the fence in an approved location.

2.4 Site Access

There will be an 8.0-meter-wide access road starting at the entrance off of William McEwen Drive that provides access to the site and around all the BESS cabinets. A site access gate will be provided for fire department access. A plume study was completed by Hatch in May 2025, which demonstrates that the emissions from the thermal runaway event were within Air Contaminant Benchmark limits at a 10m distance from the batteries, so associated adverse effects are not expected to occur. In addition, the study produced a Windrose diagram (see Appendix C) that clearly shows the predominant winds are out of the east. For this reason, only one access point will be provided coming in from the East to ensure first responders do not drive through any kind of off-gassing from an enclosure having a thermal event. Lastly, all evacuation or muster areas will be located east of the facility in accordance with the results of the plume study.

As noted above, the Fire Department should not attempt to enter the site fence line unless there is a clear threat to life safety.

2.5 Lock Box Access

A lock box containing a physical copy of the Emergency Response Plan (ERP), operational permits, O&M logs, product manuals, etc., is provided at the site entrance.

2.6 Equipment Access

The Sungrow PowerTitan 2.0 ESS enclosures are only accessible for maintenance purposes via cabinet-style enclosure doors and cannot be physically entered by personnel at any time.

The Fire Department should not attempt to open the enclosure doors at any time.

2.7 Water Supply

The site will have seven fire hydrants on the site that will be fed by an approximately 85,000 liter water tank. Water will be trucked in to feed this tank as necessary. In addition, water can also be pumped from the pond onsite.

2.8 Fire Alarm Control Panel

The primary Fire Alarm Control Panel (FACP) will be provided at a location approved by the local AHJ.

2.9 Water Retention

Upon arrival to the site, the Incident Commander shall order the gate valve on the wet pond outlet to be closed. Although best practices is to not use any water directly on an affected enclosure, if the Incident Commander deems fire hose streams necessary, the water runoff will be captured within the wet pond. The wet pond will be lined with an impermeable barrier that will not allow any contaminants to pass through.

2.10 Nearby Exposures

The facility site is surrounded on three sides by forest and open land, and William McEwen Drive on the remaining side. Additionally;

- A private residence (4160 William McEwen Dr) is located to the north, adjacent to the roadway, about 120m from the site property line.
- A small landscaping business sits at 4236 William McEwen Drive, adjacent to the site property line and William McEwen Drive.

In the event that a battery enclosure is producing smoke, the fire department may at their discretion, direct residences in the path of the smoke to close their windows, or evacuate until the fire has subsided. It should be noted that the level of contaminants produced in smoke from a battery are within the Air Containment Benchmarks set by the Ontario MECP at a distance of 10m from the battery. Therefore, it is expected that risks to health, safety, and the environment due to a battery fire is very low.

Figure 3 – Nearby Exposures

2.11 Associated Electrical Equipment

- **Energy Storage System:** Sungrow PowerTitan 2.0
- **Medium Voltage Transformers:** Sungrow MVS5140-LS-US
- **Inverters / PCS :** Sungrow SC210HX-US

2.12 Site Maintenance

The facility's interior access roads shall be maintained to guarantee accessibility to the site by emergency personnel, especially during inclement weather. The owner/operator or their designee, shall ensure landscaping, and other ongoing upkeep activities are in place prior to construction.

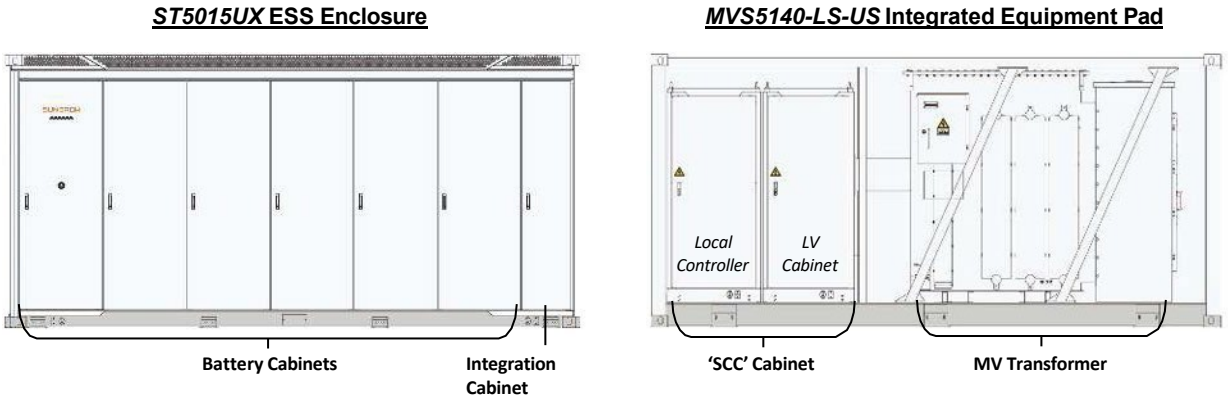
3 ENERGY STORAGE SYSTEM OVERVIEW

The Trail Road BESS facility will utilize 156 Sungrow PowerTitan 2.0 BESS units, each providing approximately 5015 kWh per unit. Each Sungrow PowerTitan 2.0 unit consists of battery modules utilizing lithium iron phosphate (LFP) battery cells.

Each Sungrow PowerTitan 2.0 BESS unit is equipped with NFPA 68 compliant vent panels to control the release of pressure if the flammable gases released during battery failure ignite within the enclosure.

Each Sungrow PowerTitan 2.0 BESS unit is equipped with four (4) smoke detectors, two (2) heat detectors, and two (2) gas detectors, battery management system (BMS), and active NFPA 69 exhaust ventilation system for removal of flammable gases from within the enclosure in the event of a battery failure as well as deflagration panels. Additional information on fire protection systems is provided in Section 4 below.

Figure 4 – Typical Sungrow PowerTitan 2.0



4 FIRE PROTECTION SYSTEMS

4.1 Exhaust Ventilation System

The PowerTitan 2.0 is equipped with exhaust ventilation system designed in accordance with NFPA 69: Standard on Explosion Prevention Systems to remove flammable gas from the enclosure before an explosive atmosphere is allowed to accumulate. The system consists of one exhaust fan with rated flow rate of 750 m3/h (441 CFM). In the event that the flammable gas detector (described above) is activated, the FSS air intake equipment and FSS exhaust equipment are triggered.

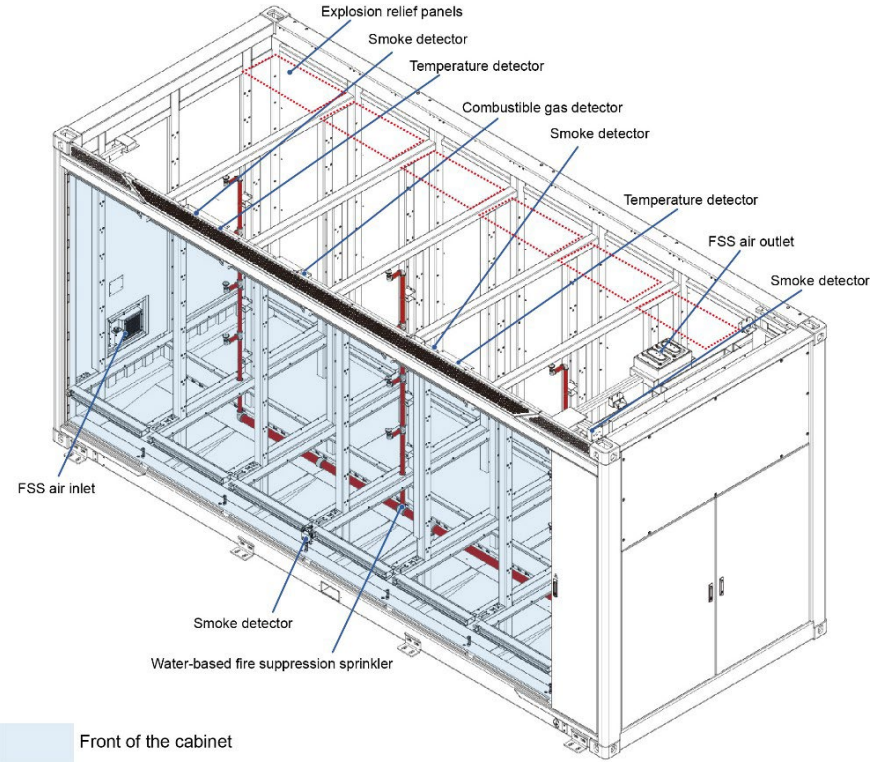
WARNING: Risk of Explosion / Deflagration	
	An explosion / deflagration / over-pressure event is a critical hazard, and any emergency on-site should always be addressed with full awareness of potential factors which may lead to such an event. **Any failure or alarm condition should result in the assumption of an explosion risk.**

WARNING: Risk of Re-ignition	
	Do **NOT** assume the fire is out as the fire event unfolds. A lithium-ion battery fire which has seemingly been extinguished may flare up again if all cells within the enclosure have not been completely consumed.

4.2 Fire Protection

Each PowerTitan 2.0 enclosure comes equipped with a number of fire safety devices. By default, each enclosure includes two (2) heat detectors, four (4) smoke detectors, dedicated UL 864-listed Fire Alarm Control Panel (FACP), and six (6) deflagration vent panels located in the roof of the enclosure.

Figure 5 – Fire and Life Safety Layout



WARNING: Risk of Re-ignition	
	Do **NOT** assume the fire is out as the fire event unfolds. A lithium-ion battery fire which has seemingly been extinguished may flare up again if all cells within the enclosure have not been completely consumed. The risk of battery re-ignition can remain present for hours or even days after the smoke / flame is initially detected.

WARNING: Risk of Explosion / Deflagration	
	An explosion / deflagration / over-pressure event is a critical hazard, and any emergency on-site should always be addressed with full awareness of potential factors which may lead to such an event. **Any failure or alarm condition should result in the assumption of an explosion risk.**

WARNING: Electrical Shock Hazard	
	In case of flooding, stay out of the water if any part of the ESS unit(s) or wiring is submerged.

4.3 Emergency Shutoffs

Emergency shutoff is provided at multiple levels, though the Fire Department should not engage with E-Stops, as ESS shutdown may adversely affect the electrical grid.

The Fire Department should not engage with E-Stops, as ESS shutdown may adversely affect the electrical grid. Any interaction with E-Stops should only be initiated in coordination with the System Owner, and other SMEs as is deemed necessary.

4.3.1 Site-Level E-Stop

Manual Emergency Stop (E-Stop) / Emergency Power Off (EPO) switch(es) are located with the facility. The exact location will be provided once the final layout is approved.

The Fire Department should not engage with E-Stops, as ESS shutdown may adversely affect the electrical grid. Any interaction with E-Stops should only be initiated in coordination with the System Owner, and other SMEs as is deemed necessary.

4.3.2 Enclosure-Level E-Stop

Each Sungrow PowerTitan 2.0 BESS unit is equipped with AC circuit breaker located within the Electrical Cabinet and is to be used only by authorized maintenance or operations personnel.

In the event of a battery-related failure, the Fire Department should not approach any battery enclosures or engage with any enclosure E-Stops.

CAUTION: Risk of Stranded Energy	
	Shutting off power to the ESS unit(s) does not de-energize the battery and shock hazard may still be present. Always treat the batteries as Energetic Hazardous Materials, as they may maintain their State of Charge (SOC) long after the removal of power to the overall ESS.

WARNING: Risk of Fire and Explosion	
 	Risk of fire or explosion may be present in the event of a battery failure. The Fire Department should not attempt to engage with any site or enclosure E-stops. Assistance in shutdown should be provided by the System Owner / Operator and any other required SMEs.

WARNING: Electrical Shock Hazard	
	In case of flooding, stay out of the water if any part of the ESS unit(s) or wiring is submerged.

4.4 Battery Management System (BMS)

An integrated Battery Management System (BMS) monitors key datapoints such as voltage, current, and state of charge (SOC) of battery cells, in addition to providing control of corrective and protective actions in response to any abnormal conditions. In the event of any abnormal conditions, the BMS will generally first raise an information warning, and then trigger a corresponding corrective action should certain levels be reached. Critical BMS sensing parameters include, but are not limited to:

- Over / under temperature limits
- Over / under voltage limits
- Over / under current limits
- Communications loss

BMS data is monitored by a 24/7 Network Operations Center (NOC) and is accessible to the System Owner / Operator and, based on the nature of a potential ESS failure, may provide information on the state of the batteries to corporate first responders.

5 FIRE DETECTION, ALARMING, AND NOTIFICATION

5.1 Fire Detection Systems

Each Sungrow PowerTitan 2.0 BESS enclosure is equipped with four (4) smoke detectors and two (2) heat detectors to provide detection of fire or abnormally high temperatures within the enclosure.

Additionally, each Sungrow PowerTitan 2.0 BESS unit is equipped with one (1) hydrogen gas detector, which, upon detection of flammable limits within the enclosure, activates the active exhaust ventilation system to remove flammable gases from the enclosure before explosive concentrations are allowed to accumulate. Lastly, each Sungrow PowerTitan 2.0 BESS unit is equipped with one (1) carbon monoxide (CO) gas detector, which, upon detection of CO detector, activates the active exhaust ventilation system to remove CO gases from the enclosure before CO concentrations are allowed to accumulate.

Activation of smoke, heat, or gas detectors shall result in the following actions:

Actions Triggered Upon Smoke, Heat, and Gas Detection:

- Activation of any smoke or heat detector will automatically send an alarm signal to the Fire Alarm Control Panel (FACP).
- Activation of a combustible gas detector upon detection of 10% LFL will send a supervisory signal to the FACP and initiative the explosion prevention (exhaust ventilation) system.
- The master FACP reports to a Network Operations Center (NOC) which then transmits to the System Owner / Operator and Ottawa Fire Services.
- All alarms are tied into the Battery Management System (BMS) and are available to the NOC.

5.2 Central Station Monitoring

In the event of heat, smoke, or gas detection within the ESS enclosure, the Central Station shall send Alarm and Supervisory signals to the Central Station which shall then be relayed to the local Fire Department to coordinate dispatch of responding units.

Table 1 – Central Station Monitoring Facility Information

Central Station Monitoring Facility Name ▪ **Phone:** TBD ▪ **Additional Information:** TBD

5.3 Remote Monitoring Facility

In addition to monitoring by the Central Station, remote monitoring of BMS operation is provided by the 24/7 Operations Center. In the event of a battery-related failure transmitted by the BMS, alarm notifications and other pertinent information on the state of the ESS shall be sent to the System Owner to inform potential emergency response procedures as needed.

Additionally, if more detailed information on the state of the Sungrow PowerTitan 2.0 BESS unit is required, the Operations Center should be contacted.

Table 2 – 24/7 Network Operations Center Information

24/7 Operations Center (for Emergency Use)

- **24/7 Emergency Hotline: TBD**
- **Email Support: TBD**

6 GENERAL HAZARDS ASSOCIATED BATTERY ENERGY STORAGE SYSTEMS

Lithium-ion battery failures pose several major risks, as are briefly described in the sections below. Specific response procedures for different incident scenarios are provided in Section 8 of this document.

6.1 Thermal Runaway

The defining characteristic of lithium-ion battery failures is a state known as thermal runaway. Thermal runaway is chemical process where self-heating in a battery exceeds the rate of cooling causing high internal temperatures, melting, off-gassing / venting, and in some cases, fire or explosion. Thermal, mechanical, and electrical abuse can lead to thermal runaway; internal short circuit from manufacturing defects; or the development of metallic dendrites that form an internal short over time.

Flammable and potentially explosive gases (generally white in color) typically evolve when an ESS goes into thermal runaway and may be released in large quantities from battery cells or modules. Fire and explosive incidents may result, and precautions as described in sections below should be observed.

6.2 Fire and Re-ignition

Lithium-ion battery fires burn extremely hot (upwards of 1,000 – 1,500°C) and are generally not easily extinguished. Fire growth may be slow, fast, or ultra-fast (e.g., during deflagration event) in nature, and may last for several hours before the battery modules

are completely consumed. Furthermore, even when a lithium-ion battery fire appears to be fully-extinguished, re-ignition risk may still be present hours or even days after there is no visible signs of fire.

Application of water directly to affected battery modules may potentially prolong the incident, and decision to apply water should be made in coordination with the System Owner / Operator and any other required SMEs.

WARNING: Risk of Re-ignition	
	Do **NOT** assume the fire is out as the fire event unfolds. A lithium-ion battery fire which has seemingly been extinguished may flare up again if all cells within the enclosure have not been completely consumed. The risk of battery re-ignition can remain present for hours or even days after the smoke / flame is initially detected.

NOTICE	
	Indicators which may provide insight into what is happening or about to happen during an incident may include: ▪ Smoke or flames ▪ Change in smoke color ▪ Change in velocity or volume of smoke production ▪ Sounds – popping and / or hissing ▪ Smell – sweet smell

6.3 Explosion

Lithium-ion batteries release flammable off-gases during thermal runaway which, if allowed to accumulate within the enclosure, may create an explosive atmosphere, posing serious risk to first responders and nearby exposures. These gases may accumulate within the ESS enclosure at levels above the Lower Explosive Limit (LEL). At sufficiently high accumulations, gases can also exceed their Upper Explosive Limit (UEL), at which point ventilation may bring the environment back into flammable limits, thus creating a new explosion risk.

It may be difficult to discern conditions within the enclosure if smoke and gas are not visible outside of the enclosure. Furthermore, a single battery cell may release enough flammable off-gas to generate an explosive atmosphere within the enclosure. Therefore, any failure or alarm condition should always result in the assumption of a potential explosion risk.

WARNING: Risk of Explosion / Deflagration	
	An explosion / deflagration / over-pressure event is a critical hazard, and any emergency on-site should always be addressed with full awareness of potential factors which may lead to such an event. **Any failure or alarm condition should result in the assumption of an explosion risk.**

6.4 Electric Shock

Even if a battery may look to be destroyed by fire and / or other means, there is potential that the battery still contains stranded energy and remains energized. De-energization of the system or any removal of the battery or battery component shall only be performed by a trained and competent individual with appropriate PPE.

Normal overhaul the ESS enclosure should not be attempted by the fire department in any circumstances, as there are considerations for handling damaged batteries requiring equipment and expertise not readily available. Once the scene is secured, these actions may be undertaken by trained experts under close supervision.

WARNING: Risk of Stranded Energy	
	Always treat the batteries as Energetic Hazardous Materials, as stranded energy is likely to remain present. Traditional Fire Department overhaul should not be conducted due to the potential for stranded energy.

6.5 Arc Flash

All ESS systems and related electrical equipment shall always be treated as energized (Energetic Hazardous Material).

Qualified PPE and training is required when working or accessing equipment within an Arc Flash Boundary. In general, when in direct proximity of the battery enclosure, wear non-melting or untreated natural fiber long-sleeve shirt, long pants, safety glasses, hearing protection, and leather gloves. AR plant clothing is also acceptable. Maintain arc flash boundary until completion of any particular task.

6.6 Toxic Smoke and Gas Emission

Lithium-ion batteries may release large quantities of flammable and toxic gas when undergoing failure and pose an inhalation hazard. Chemicals consumed during a thermal runaway event will produce smoke. Based on the results of the Plume Study, no stationary air monitoring devices will be installed. The Owner will provide air monitoring resources on site in the event of an emergency.

The ESS site perimeter should not be entered during a fire or off-gassing event unless there is an imminent threat to life safety, at which time only properly trained and equipped public safety personnel may enter. This entry shall be with full firefighter protective gear to include self-contained breathing apparatus (SCBA). Handheld gas meters can be deployed to monitor smoke coming from the enclosure if available.

A fog pattern from a handline or monitor nozzle may be an effective way to control the off-gassing event on the exterior of the battery container from migrating to unwanted areas.

However, if water is used in extinguishing flames, these gases can become acids which may cause skin irritation.

WARNING: Toxic Gases	
	Large quantities of toxic smoke and gas may be emitted from the ESS during battery off-gassing or fire situations. **Proper PPE including SCBA should be worn by first responders.**

NOTICE	
	Typical composition of battery off-gassing event may include: ▪ High concentrations (>10%) of Hydrogen, Carbon Monoxide, Carbon Dioxide ▪ Lower concentration (<10%) of Methane, Ethane, or other flammable hydrocarbons

6.7 Additional Hazards and Considerations

For additional hazards associated with leaked coolant, leaked refrigerant, leaked electrolyte, or emergency considerations during storage, operation, transportation, or first aid measures, and disposal procedures, please see product-level Emergency Response Guide.

7 EMERGENCY RESPONSE CONSIDERATIONS

7.1 Emergency Contacts

A list of emergency contacts associated with this installation are provided on Page 3.

7.2 Equipment and Personnel Protective Equipment (PPE)

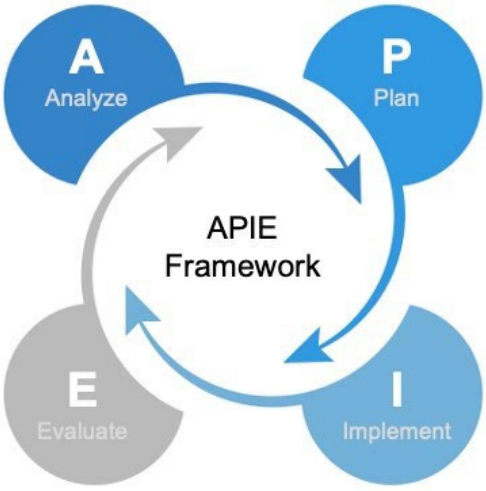
Full firefighter protective gear shall be worn in any response to a fire and / or explosion event or if there is any indication a fire may be present or likely to be present at any time during the event.

If there is no risk of fire or explosion present, arc-rated (AR) protective clothing to protect against arc flash and electrical shock shall be worn. Jewelry, such as necklaces, shall be removed to avoid contact with any electrical hazard.

Proper PPE shall include use of Self-Contained Breathing Apparatus (SCBA).

7.3 APIE (Analyze, Plan, Implement, and Evaluate) Framework

APIE is a framework commonly used for emergency incident preparation and development of appropriate response protocol(s). The four elements of the framework are Analyze, Plan, Implement, and Evaluate. An example APIE framework with simplified sample details pertaining to an emergency incident is as follows:



Analyze: Provide signs and monitoring signals that indicate incident escalation (e.g., fire or explosion) may take place which first responders should be aware of

Plan: Delineate the danger zone to mitigate risk to first responders and bystanders (pedestrians, vehicular traffic, etc.)

Implement: Once a plan is developed and proper resources and equipment installed, implement respective safety actions as deemed necessary.

Evaluate: Provide continuous monitoring and feedback of the incident and adjust accordingly to ensure ongoing safety of any bystander or responder in the impact area.

7.4 General Emergency Response Recommendations

Initiation of emergency response shall be activated per current protocol.

Table 3 - General Emergency Response Recommendations

General Emergency Response Recommendations:

1. **If there is any threat or potential threat to life or safety, 911 shall be called immediately to summon the aid of public safety responders.**
2. **An initial scene assessment shall be conducted from all sides** (360-degree scene size-up) if possible, and a clear concise assessment shall be given to incoming responders. Hazards and facility safety concerns such as high voltage areas or other electrical concerns shall be announced to all responders. The scene assessment shall include the following in plain language (no code or terms):
    - Where the incident is located
    - What has happened
    - What is occurring
    - Any injuries or unaccounted for individuals
    - What needs or other resources should be requested
3. **An Incident Command System (ICS) shall be established immediately and shall include designation of roles.** The primary command post location shall be located at the Fire Department Staging Area at the front of the site. If Public Safety is summoned to the incident, the ICS shall be a Unified Incident Command System (UICS).
4. **On-site staff (if applicable) shall immediately go to a designated muster point,** which will be the command post location unless designated differently by the Incident Commander.
5. **Incident Command shall designate the individual in charge of accountability.** Accountability shall be reported as soon as possible. If available, another individual shall control any traffic and guide first responders to the scene.

Notes:

- At the same time as these activities are occurring, the System Owner / Operator or other designated SME shall immediately contact the 24/7 Network Operations Center to establish available data from the BMS and communicate this to the Incident Commander or other appropriate individual.
- It is recommended that a safe perimeter is set up and maintained around the site to keep any persons or personnel a safe distance from the incident.

WARNING: Risk of Explosion / Deflagration	
	An explosion / deflagration / over-pressure event is a critical hazard, and any emergency on-site should always be addressed with full awareness of potential factors which may lead to such an event. **Any failure or alarm condition should result in the assumption of an explosion risk.**

WARNING: Toxic Gases	
	Large quantities of toxic smoke and gas may be emitted from the ESS during battery off-gassing or fire situations. **Proper PPE including SCBA should be worn by first responders.**

7.5 Determine Fire Protection Approach

Caution should be exercised if water is applied directly to the exterior of an affected ESS enclosure, as this will not stop a thermal runaway event and may potentially delay eventual combustion of the entire ESS product. Defensive firefighting tactics are generally recommended, with water being applied to nearby exposures for cooling, as necessary. Any hoseline operations should be limited to hose and master stream application from outside of the construction perimeter as far back as hose and stream ranges allow. The decision to provide thermal cooling via hoselines should be made in coordination with System Owner / Operator and any other required SMEs.

A fog pattern from a handline or monitor nozzle may potentially be utilized to control smoke and gases released from the affected enclosure and prevent them from migrating to unwanted areas.

In all instances, power shut down and isolation involving any high voltage feeder lines must be confirmed before any defensive measures are taken involving application of water to the site.

WARNING: Risk of Re-ignition	
	Do **NOT** assume the fire is out as the fire event unfolds. A lithium-ion battery fire which has seemingly been extinguished may flare up again if all cells within the enclosure have not been completely consumed. The risk of battery re-ignition can remain present for hours or even days after the smoke / flame is initially detected.

7.6 Incident Monitoring and Evaluation:

Continuous monitoring and feedback on the incident should be provided as the situation evolves. Consultation with the System Owner / Operator and any other required SMEs should be held to guide incident response and determine appropriate next steps.

If available, real-time BMS data from the 24/7 Network Operations Center should be utilized (e.g., temperature, voltage, or other critical measurements) to monitor the spread of failure and assess the health of adjacent ESS units to help guide response procedures as the event unfolds.

8 INCIDENT SCENARIOS AND RESPONSE PROCEDURES

8.1 Explosion Incident

Lithium-ion batteries release flammable off-gases during thermal runaway which, if allowed to accumulate within the enclosure, may create an explosive atmosphere, posing serious risk to first responders and nearby exposures. Furthermore, it may be difficult to discern conditions within the enclosure if smoke and gas are not visible outside of the unit.

In case of fire or thermal runaway event, an explosive or deflagration event may occur potentially subjecting personnel to overpressure and projectile hazards. An initial exclusion area should be established, based on discretion of the Incident Commander, to guard against any blast overpressure. Fire Department staging or operations should not be in direct alignment with the ESS units and should be established at angles relative to the sides of the enclosures if possible. If available, shielding via the built environment should be utilized to protect against high temperatures, overpressure events, or projectile hazards.

A safe stand-off distance of at least 30m shall be maintained between individuals and the ESS enclosure(s) exhibiting fire conditions. Staging of personnel and equipment shall be on the angles of the ESS enclosure to stay out of the potential blast radius of any enclosure doors or other possible projectiles.

WARNING: Risk of Explosion / Deflagration	
	An explosion / deflagration / over-pressure event is a critical hazard, and any emergency on-site should always be addressed with full awareness of potential factors which may lead to such an event. **Any failure or alarm condition should result in the assumption of an explosion risk.**

8.2 Fire Incident

Upon detection of fire or excessive heat emanating from an affected ESS enclosure by the heat or smoke detectors, an audible and visual alarm shall be signaled at the Annunciator Panel. Smoke and flames may be visible from the outside of the ESS enclosure. Fire growth may be slow, fast, or ultra-fast (e.g., during deflagration event) in nature.

A safe stand-off distance of at least 30m shall be maintained between individuals and the ESS enclosure(s) exhibiting fire conditions. Staging of personnel and equipment shall be on the angles of the ESS enclosure to stay out of the potential blast radius of any enclosure doors or other possible projectiles. Attempt to extinguish the fire only if imminent threat to life safety exists.

If there is no immediate threat to life safety:

1. Allow the ESS to burn in a controlled fashion until all fuel sources inside are depleted.
2. A defensive approach should be considered utilizing water to cool and protect adjacent exposures and mitigate the spread of fire to areas outside of the fenced installation. Manage the fire incident utilizing the reach of the hose stream to protect exposures and control the off-gassing and smoke from the enclosure.
3. Remember that even after the ESS is isolated from the electric grid there may still be considerable stored energy in the batteries that poses a potential electric shock hazard to anyone in the nearby vicinity.

Additionally, chemicals released during a fire or explosion event will be in a gaseous form and primarily pose an inhalation hazard. A fog pattern from a handline or monitor nozzle may provide an effective means of controlling an off-gassing event on the exterior of the battery enclosure from migrating to unwanted areas such as public muster points, emergency responders, building intakes, etc. Fire Department Hazmat Technicians shall utilize handheld monitoring equipment to determine the hot zone. Only firefighters in full PPE may enter the hot zone.

Hose streams may be also applied to adjacent exposures for cooling purposes based on consultation with System Owner / Operator and other required SMEs. BMS data available via the 24/7 Network Operations Center should be closely monitored for the adjacent system(s) for any indicators of heat impact or water damage to any adjacent ESS units and relayed to the appropriate individual within the Incident Command System.

Following partial or complete consumption of the system by fire, batteries may continue to emit flammable gases and toxic gases for an extended period of time. Hazmat Technicians with handheld monitors should provide continuous monitoring of gas levels in and around the incident location. Full firefighter PPE and SCBA shall be utilized until gas levels are confirmed to be at a safe level. A Firewatch shall be provided to ensure the continued safety of the site after the situation appears stable.

WARNING: Risk of Re-ignition	
	Do **NOT** assume the fire is out as the fire event unfolds. A lithium-ion battery fire which has seemingly been extinguished may flare up again if all cells within the enclosure have not been completely consumed. The risk of battery re-ignition can remain present for hours or even days after the smoke / flame is initially detected.

8.3 Thermal Runaway or Off-Gassing Incident

A thermal runaway incident, as described in Section 6.1, is the characteristic failure mode of lithium-ion batteries. A thermal runaway event may begin suddenly, and the nature of the situation may evolve rapidly depending on a number of different factors. Combustion of flammable gases may result in fire or explosion, and considerations in Section 8.1 and Section 8.2 above should be observed based on the nature of the event as it unfolds.

A thermal runaway event may result in large quantities of smoke and gas being released, which may or may not be visible outside of the ESS enclosure itself; therefore, it is critical that any failure or alarm condition result in the assumption of an explosion or fire risk.

In the event of a thermal runaway or suspected off-gassing event, the following actions should be taken:

1. Evacuate the area to a safe location a sufficient distance from the troubled enclosure
2. If the alarm system has not already signaled the Fire Department, immediately call 911
3. Call any required Subject Matter Experts designated for the site
4. Call the Sungrow 24/7 Network Operations Center listed on Page 3
5. Fire Department Hazmat Technicians shall utilize handheld monitoring equipment to determine the hot zone. Only firefighters in full PPE may enter the hot zone.
6. Establish a safety perimeter around all sides of the ESS and remain outside the fenced area. Do not allow personnel other than firefighters in proper PPE to enter the safety perimeter and stay upwind of any smoke or off-gassing. (Note: the safety perimeter may extend beyond the boundary of the fenced area).
7. As the incident evolves, a fire or explosion event may occur, and procedures outlined in Section 8.1 and Section 8.2 above should be followed based on the situation as it progresses.

WARNING: Risk of Explosion / Deflagration	
	An explosion / deflagration / over-pressure event is a critical hazard, and any emergency on-site should always be addressed with full awareness of potential factors which may lead to such an event. **Any failure or alarm condition should result in the assumption of an explosion risk.**

WARNING: Risk of Re-ignition

	Do **NOT** assume the fire is out as the fire event unfolds. A lithium-ion battery fire which has seemingly been extinguished may flare up again if all cells within the enclosure have not been completely consumed. The risk of battery re-ignition can remain present for hours or even days after the smoke / flame is initially detected.

WARNING: Toxic Gases	
	Large quantities of toxic smoke and gas may be emitted from the ESS during battery off-gassing or fire situations. **Proper PPE including SCBA should be worn by first responders.**

NOTICE	
	Indicators which may provide insight into what is happening or about to happen during an incident may include: ▪ Smoke or flames ▪ Change in smoke color ▪ Change in velocity or volume of smoke production ▪ Sounds – popping and / or hissing ▪ Smell – sweet smell

8.4 Alarm Incident

In the event of an alarm activation, the following actions should be taken:

1. Evacuate the area to a safe location a sufficient distance from the troubled enclosure
2. If the alarm system has not already signaled the Fire Department, immediately call 911
3. Call any required Subject Matter Experts designated for the site
4. Call the 24/7 Network Operations Center listed on Page 3
5. Establish a safety perimeter around all sides of the ESS and remain outside the fenced area. Do not allow personnel other than firefighters in proper PPE to enter the safety perimeter and stay upwind of any smoke or off-gassing. (Note: the safety perimeter may extend beyond the boundary of the fenced area).

8.5 External Fire / Thermal Exposure Incident

For any type of external heat source or fire impingement (i.e., not stemming from the battery system itself), the Incident Commander should be advised to look at the state of health information from the BMS data (e.g., increasing temperature in target ESS units) available from the 24/7 Sungrow Network Operations Center to evaluate severity of the

incident and treat as an ESS emergency. All precautions previously noted for fire and explosion incidents should be observed.

8.6 External Impact Incident

In the event that an enclosure is severely impacted causing crushing or puncturing of the outer shell of the enclosure, treat this as an emergency - notify 911 and other required parties.

9 INCIDENT SCENARIOS AND RESPONSE PROCEDURES

9.1 Handoff Procedures

When an energy storage site is deemed safe, upon determination by the Incident Commander (IC), the Subject Matter Expert (SME)/Fire Remediation Personnel, if not immediately present, shall be called out to continue air monitoring as well as to ensure that the site is safeguarded until the damaged system is removed, repaired, or replaced based on the approved Decommissioning Plan filed with this installation.

9.2 Activation of Decommissioning Plan

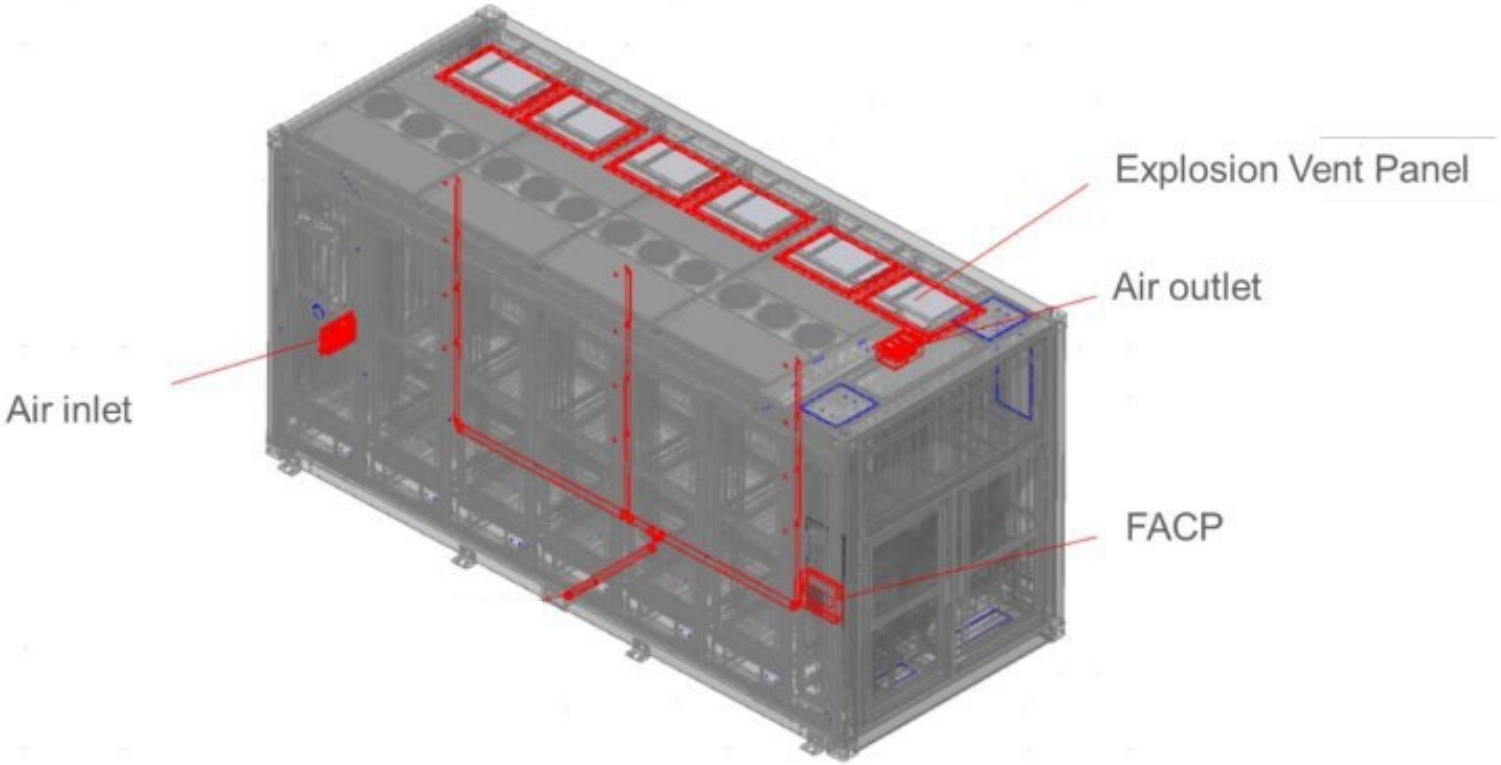
Decommissioning of the system shall take place in accordance with the approved Decommissioning Plan filed with this installation. Deactivation, de-energizing, dismantling, and removal of the system shall be conducted by trained and knowledgeable persons in accordance with manufacturer's specifications.

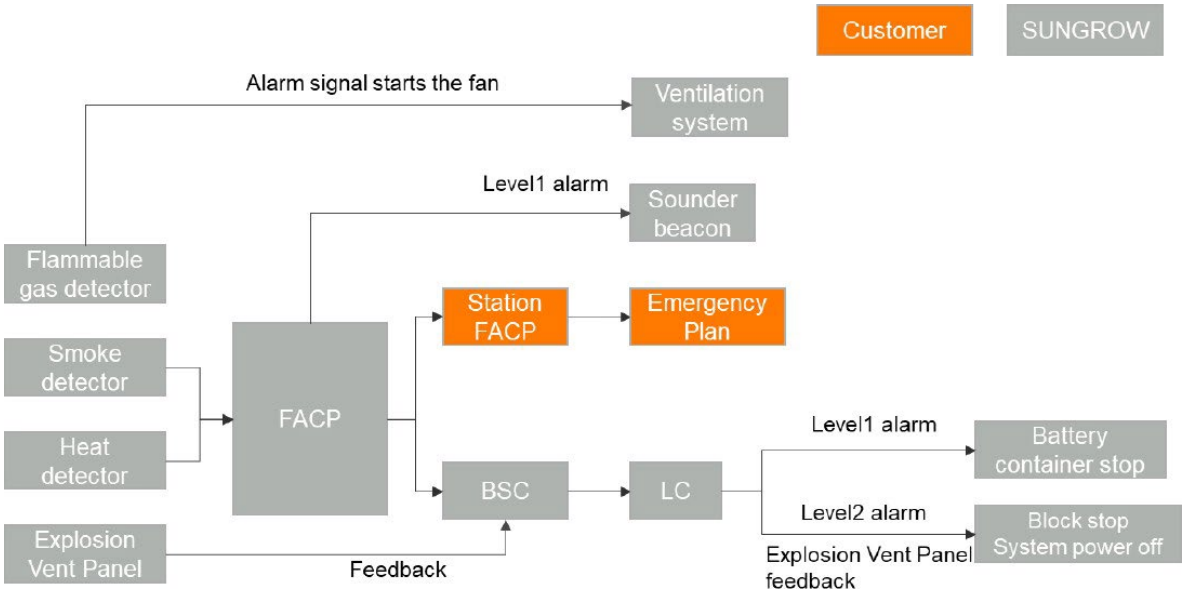
In addition, Evolugen has committed to perform air, soil, water monitoring per the applicable regulations and standards. At a minimum, they will be conducting soil testing within the immediate incident area, water testing within the wet pond, and water sampling immediately outside of the wet pond outlet. If above normal contaminant concentrations are observed, further water & soil sampling will be conducted outside of the facility at intervals specified by the subject matter expert.

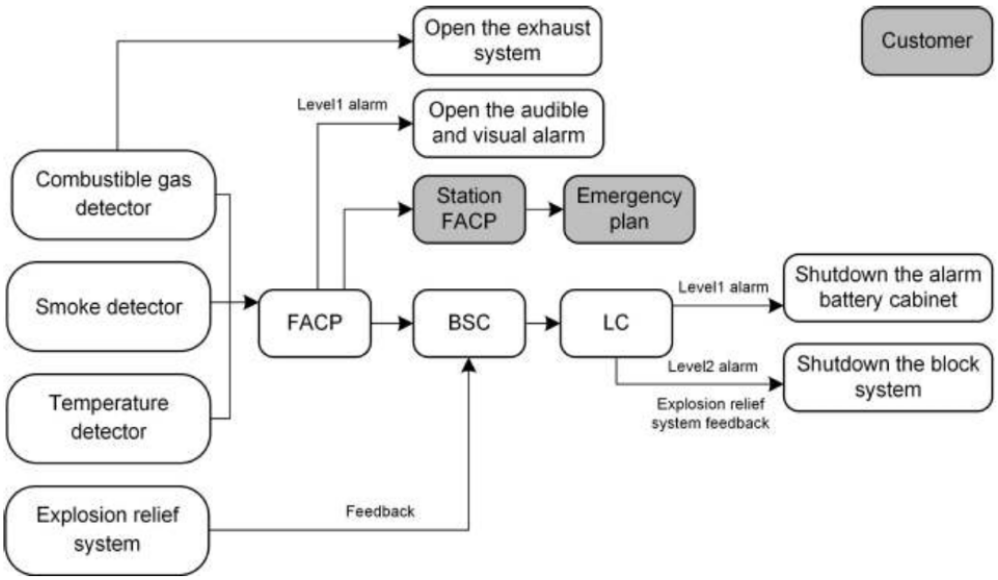
APPENDICES

APPENDIX A – Additional Site Photos

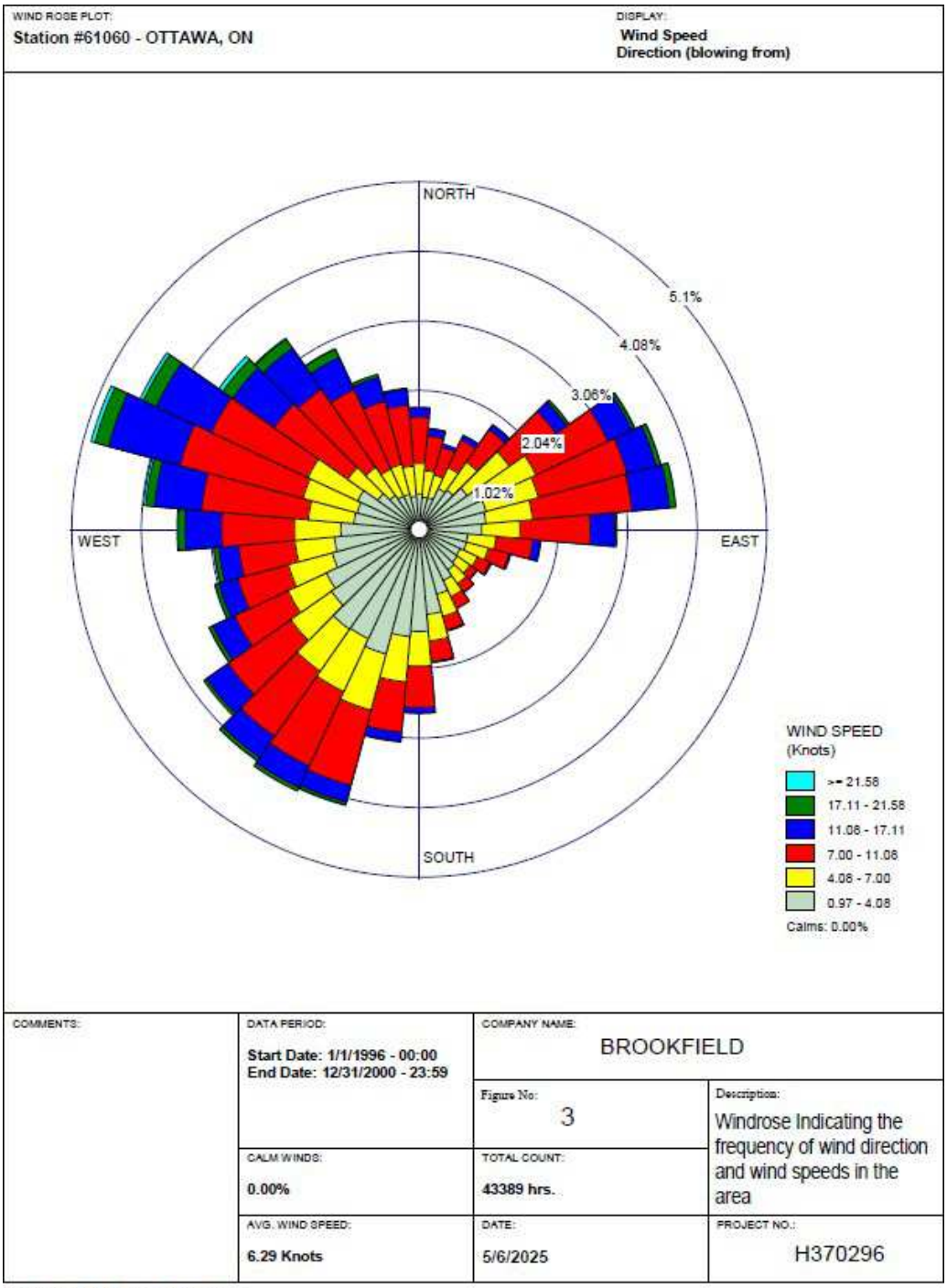
APPENDIX B – Additional Information




Customer
SUNGROW
Alarm signal starts the fan
Ventilation system
Level1 alarm
Sounder beacon
Flammable gas detector
Smoke detector
Heat detector
Explosion Vent Panel
FACP
Station FACP
Emergency Plan
BSC
LC
Level1 alarm
Battery container stop
Level2 alarm
Block stop System power off
Explosion Vent Panel feedback
Feedback


Open the exhaust system
Customer
Level1 alarm
Open the audible and visual alarm
Combustible gas detector
Station FACP
Emergency plan
Smoke detector
FACP
BSC
LC
Level1 alarm
Shutdown the alarm battery cabinet
Level2 alarm
Shutdown the block system
Explosion relief system feedback
Temperature detector
Explosion relief system
Feedback

APPENDIX C – Windrose



APPENDIX D – Sungrow PowerTitan 2.0 Operation & Maintenance Instruction