Rich Road Solar Energy Center
Matter No. 22-00031
§900-2.19 Exhibit 18: Socioeconomic Effects

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§900-2.19 Exhibit 18 Socioeconomic Effects

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18.0 EXHIBIT 18 – SOCIOECONOMIC EFFECTS

SUMMARY OF EXHIBIT

Rich Road Solar Energy Center, LLC (RRSEC) assessed potential socioeconomic effects associated with the construction and operation of the Facility. The Study Area for socioeconomics consists of St. Lawrence County and the town of Canton as the communities hosting the Facility site. RRSEC anticipates that construction will last approximately 24 months and employ an average of 167 full-time equivalent (FTE) jobs and a peak of 300 FTE jobs; fully burdened annual earnings are expected to reach $25,700,000. Four full-time jobs are anticipated for operation, a site manager, and solar technicians, and fully burdened annual earnings are expected to reach $313,000 to $443,000. RRSEC expects that the majority of these construction jobs will be filled by residents of New York State and will endeavor to hire locally within St. Lawrence County.

RRSEC consulted with the host communities to identify potential impacts to local services. Construction and operation of the Facility would result in minor if any increases in demand for local services and corresponding municipal costs.

RRSEC met with the Canton Fire Department, Pyrites Fire Department, and Rensselaer Falls Fire Department on October 5, 2022, to review the Facility design. Consultation with the fire departments regarding the design, response capacity, and training is ongoing. RRSEC is committed to regularly training and informing local first responders about the Facility and its components to respond in the unlikely event of an emergency.

RRSEC is a privately funded energy project that will not result in the construction or operation of public infrastructure and will not result in unnecessary sprawl; however, this analysis provides a detailed statement regarding the Facility's consistency with the smart growth criteria in New York Environmental Conservation Law (EC)L § 6-010.

RRSEC will result in positive impacts to public welfare through employment opportunities, and opportunities for local residents to benefit from economic opportunities associated with the clean energy transition. EDF Renewables , Inc. (EDF Renewables) developed the Trades and Clean Energy Scholarship program to award a $2,000 scholarship annually for 10 years to for two students who intend to apply for a post-secondary program related to renewable energy. EDF Renewables implemented the scholarship in the 2021/2022 school year and is actively working with the Canton Central School District to implement the scholarship for upcoming school years. Additionally, the "Sharing the Sun" fund, would provide $30,000 annual for the first ten years of the project to provide grants to local community organizations. Host communities will realize an increase in revenue through payment-in-lieu of tax agreement (PILOT) agreements.

18.1 WORK FORCE, PAYROLL, AND EXPENDITURES

18.1.1 Construction Workforce (19 NYCRR § 900-2.19(a))

RRSEC developed estimates of the workforce needed for construction of the Facility based on similar projects. RRSEC anticipates that construction will last approximately 24 months and employ an annual average of 167 FTE jobs and a peak of 300 FTE jobs. Table 18.1-1 provides a breakdown of the average FTE jobs for each quarter during construction, as well as total FTE jobs by discipline.

Local, regional, and statewide employment during the construction phase will primarily benefit those in the construction trades, including equipment operators, truck drivers, laborers, and electricians. RRSEC expects that the majority of these construction jobs will be filled by residents of St. Lawrence County. Facility construction will also require workers with specialized skills, such as crane operators, solar energy facility assemblers, specialized excavators, and high voltage electrical facility workers. RRSEC will hire residents within the labor market area to fill highly specialized positions (i.e., engineers and other professional services) to the extent possible. Workers located outside the labor market area will be expected to remain in the region only for the duration of construction.

Table 18.1-1 Estimated Construction Quarterly Full-Time Equivalent Averages

Type of Job	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Total Full Time Equivalent
Laborers	3	3	21	21	26	26	16	16	112
Electricians	4	4	25	25	30	30	19	19	130
Equipment Operator	0	0	3	3	3	3	2	2	14
Construction Managers	1	1	5	5	6	6	4	4	26
Foremen	0	0	2	2	2	2	1	1	10
Engineers and Other Professional Services	8	8	8	8	8	8	8	8	42
Total	**16**	**16**	**63**	**63**	**75**	**75**	**50**	**50**	334

Source: EDF Renewables, Inc. internal historic workforce estimates

Note:

[1] Totals may not sum due to rounding.

18.1.2 Construction Payroll and Expenditures (19 NYCRR § 900-2.19(b)

Table 18.1-2 provides estimates of the annual construction earnings by trade. RRSEC estimates a total of $25.7 million for annual earnings of the 167 on-site construction jobs for New York residents for each year of construction. Estimated earnings represent total wages and salary compensation paid to New York State and St. Lawrence County employees (i.e., wages plus average annual overhead costs, including Supplemental Security Income, Medicare, workers' compensation, and disability). Project development and on-site labor earnings are realized by New York State and St. Lawrence County residents engaged in the construction of the Facility, including the construction, engineering, and professional services trades.

RRSEC estimates that direct non-payroll expenditures in the Study Area during the period of construction will include the electrical balance of the Facility equipment, and materials and equipment rentals related to roads, foundations, and fencing. Development costs, including permitting and other costs such as legal fees and insurance, are also expected to be within the host communities. Table 18.1-3 provides an estimate of expenditures in New York State and the host communities.

Table 18.1-2 Average Full-Time Equivalent and Estimated Payroll during Construction (thousands)

Type of Job	Annual FTE Created	Average Hourly Payroll Expense[1]	Estimated Annual Project Payroll[1,2]	Estimated Total Project Payroll[1,2]
Laborers	56	$58	$6,760	$13,510
Electricians	65	$86	$11,630	$23,260
Equipment Operator	7	$56	$820	$1,630
Construction Managers	13	$108	$2,920	$5,840
Foreman	5	$111	$1,150	$2,310
Engineers and Other Professional Services	21	$53	$2,320	$4,630
Total FTE	**167**	**$74**	**$25,700**	**$51,180**

Source: EDF Renewables, Inc. internal historic payroll estimates

Notes:

1 Estimated Payroll represents total wages and salary compensation, including benefits.

2 Estimated Total Project Payroll assumes 2,080 hours per FTE and a 24-month construction period.

Key:

FTE = full-time equivalent

Table 18.1-3 Non-Payroll Expenditures during Construction (thousands)

Expenditure	Cost	New York Share, %	New York	Host Municipalities Spending Share, %	Host Municipalities Spending
Materials and Equipment					
Fencing	$3,600	80%	$2,880	1%	$180
Road Construction	$4,160	80%	$3,330	1%	$210
Foundations Materials	$11,140	80%	$8,910	1%	$560
Electrical	$17,500	80%	$14,000	1%	$880
Subtotal	$36,380	80%	$29,100	1%	$1,820
Development Costs					
Permitting	$5,280	40%	$4,220	1%	$260
Other Costs	$5,240	50%	$4,190	1%	$260
Subtotal	$10,520	50%	$8,420	1%	$530
Total[1]	$46,920	75%	$37,540	1%	$2,350

Source: EDF Renewables, Inc., internal historic cost estimates

Note: 1 Totals may not sum due to rounding.

18.1.3 Operations Workforce, Payroll, and Expenditures (19 NYCRR § 900-2.19(c))

RRSEC estimates that the operation and maintenance of the Facility would generate three full-time jobs for New York residents: one site manager and three solar technicians. The fully burdened annual earnings for these four positions will be approximately $313,000 to $443,000. Non-labor expenditures made in the host communities will generally include maintenance activities and include tools or services for cleaning and landscaping. Table 18.1-4 provides an estimate of payroll during operations, and Table 18.1-5 provides an estimate of expenditures expected to be procured in New York State and the host communities.

Table 18.1-4 Average Full-Time Equivalent and Estimated Payroll during Operations (thousands)

Type of Job	FTE Created	Average Hourly Payroll Expense[1]	Estimated Total Annual Project Payroll[1,2]
Site Manager	1	$55–$65	$114–$135
Solar Technician	3	$32–$49	$200–$309
Total FTE	**4**	**$32-$65**	**$313-$443**

Source: EDF Renewables, Inc., internal historic payroll estimates

Note:

1 Estimated Payroll represents total wages and salary compensation, including benefits.

2 Estimated Total Annual Project Payroll assumes 2,080 hours per FTE.

Key:

FTE = full-time equivalent

Table 18.1-5 Non-Payroll Expenditures during Operations (thousands)

Expenditure	Cost	New York Share, %	New York	Host Municipalities Spending Share, %	Host Municipalities Spending
Materials and Equipment					
Communications and SCADA Equipment Maintenance	$26	50%	$13	0%	$-
Electrical Component Maintenance	$148	75%	$111	10%	$15
Scheduling & Dispatch in the NYISO	$418	50%	$209	0%	$-
Insurance Premiums	$46	100%	$46	0%	$-
General Maintenance - Facilities & Structures	$12	100%	$12	25%	$3
Utilities	$16	100%	$16	100%	$16
O&M General Overhead, Payroll and Operations	$1,342	75%	$1,007	20%	$268
Weather Station Monitoring	$2	100%	$2	0%	$-
Replacement Modules	$38	0%	$0	0%	$-
Vegetative Buffering Maintenance	$8	100%	$8	100%	$8
Tracker System	$112	20%	$22	10%	$11
Road, Fence & Gate Repairs	$36	100%	$36	50%	$18
Snow Removal	$82	100%	$82	100%	$82
Substation & POI Maintenance & Servicing	$94	75%	$71	10%	$9
Telecommunications Services	$136	100%	$136	0%	$-
Travel Expenses	$14	50%	$7	10%	$1
Weed Abatement	$190	100%	$190	50%	$95
Total[1]	**$2,720**	**76%**	**$2,067**	**17%**	**$462**

Source: EDF Renewables, Inc., internal historic cost estimates

Note:

1 Totals may not sum due to rounding.

Key:

NYISO = New York Independent System Operator, Inc.

O&M = operations and maintenance

POI = Point of Interconnection

SCADA = supervisory control and data acquisition

18.2 SCHOOL DISTRICTS OPERATING AND INFRASTRUCTURE COSTS (19 NYCRR § 900-2.19(D))

The Facility Site is located entirely within the Canton Central School District. The school district experienced revenue increase from 2020 to 2021 and a decrease in indebtedness during the same timespan (Office of the New York State Comptroller 2022). Total enrollment in the district decreased from 1,171 in 2020 to 1,113 in 2021.

Construction vehicles traveling on US Route 11 between Interstate 81 and the Facility Site would pass through the Indian River, Gouverneur, and Hermon-Dekalb school districts; however, no project components would be located within these districts. As discussed in Exhibit 16 Effect on Transportation, RRSEC will coordinate with school districts during construction to ensure that any temporary increases in traffic or oversized deliveries do not affect school bus routes.

RRSEC does not expect any additional operating or infrastructure costs to be incurred by the Canton Central School District. RRSEC will hire local construction workers to the extent possible. Non-local construction workers will not be expected to permanently relocate to the area or be accompanied by their families. Therefore, enrollment at local schools is not expected to increase as a result of construction. RRSEC will employ three full-time employees during operations and expects these positions will be filled by local residents.

RRSEC consulted with the superintendent of the Canton Central School District via a virtual meeting on October 6, 2022. During the meeting, RRSEC summarized construction and operation employment estimates and potential impacts to school bus transportation. RRSEC extended invitations for all public meetings outlined in Exhibit 2 Overview and Public Involvement, to regional school districts and did not receive comments expressing concern regarding impacts to school district services. Although some non-local employees could have school-aged children, this number would be expected to be a small percentage of current enrollment and increases in school district services and expenditures would likely be recovered through those employees' property tax payments and the respective district's state aid. Moreover, the affected school district will receive a considerable share of PILOT payments. These payments will more than offset any possible increase in expenses incurred by the district because of Facility employees' children entering the school district. Therefore, no increases in school district costs associated with the Facility are expected.

18.3 MUNICIPAL OPERATING AND INFRASTRUCTURE COSTS (19 NYCRR § 900-2.19(e))

RRSEC is not expected to result in any additional operating or infrastructure costs to the Town of Canton, public authorities, or utilities.

Understanding the fiscal health of communities in which a project will be located provides context for assessing the potential economic impacts or benefits of that project. Revenues in St. Lawrence County increased between 2019 and 2020, while revenues decreased in the town of Canton during the same period. Despite the decrease in revenue, revenue did not exceed expenditures in Canton (Office of the New York State Comptroller 2022).

As described in Exhibit 2 Overview and Public Involvement, RRSEC consulted with local municipalities and agencies at a meeting with the Town of Canton and St. Lawrence County on June 22, 2022, and with the Town of Canton on September 16, 2022, in adherence to 19 New York Codes, Rules and Regulations § 900-1.3(a). During the meeting on June 22, 2022, RRSEC described the proposed Facility, its environmental setting, and reviewed a map of Facility components and regulatory boundaries. Additionally, RRSEC reviewed topics of potential concern to municipalities, including traffic, visual, sound, and glare, an overview of environmental studies, and an overview of site restoration and decommissioning activities. On September 16, 2022, RRSEC met with representatives of the Town of Canton to discuss the project overview and layout, preliminary visual, and local laws. RRSEC also hosted two public community meetings on July 22, 2021, and July 14, 2022, and engaged in numerous meetings with municipal representatives. During this consultation and public engagement, municipalities did not raise any specific concerns regarding infrastructure costs that would be incurred from the Facility aside from the desire for a road use agreement. RRSEC will not require municipal water or sewer services.

As discussed in Exhibit 6 Public Health, Safety, and Security, construction of the Facility will generate waste from site preparation, packing materials, and construction scrap, and operations will generate minor amounts of waste related to maintenance activities. RRSEC will be responsible for collecting and transporting construction waste and paying applicable fees for disposal at the North Country Landfill and St. Lawrence County transfer station or other nearby recycling.

With respect to police services, as part of Exhibit 6 Public Health, Safety, and Security, RRSEC committed to developing and implementing security measures (see Site Security Plan, Appendix 6-B), including lighting, fencing, locked gates, signage, and other measures designed to restrict site access and deter trespassers during construction and operation of the Facility. RRSEC will implement a Safety Response Plan (see Appendix 6-C) that includes measures for responding to various emergencies, including those that could potentially involve the police. These measures, taken together, will limit the need for the Facility to utilize municipal police services.

With respect to fire, in the unlikely event that municipal fire services are utilized, the annual revenues from the Facility's fire district taxes to the Canton Fire District (with Canton Fire Department serving facility site) will cover any costs. The Facility is served by the Canton Fire Department (funded in part by Canton Fire District) and the Rensselaer Falls Fire Department and Pyrites Fire Department (not included in a Fire District). RRSEC met with the Canton Fire Department, Pyrites Fire Department, and Rensselaer Falls Fire Department on October 5, 2022, to review the Facility design. Based on consultations with the local emergency responders, no new or additional equipment is needed and both departments currently have solar projects in their service areas. Consultation with the fire departments regarding training is ongoing.

With respect to emergency medical response, local emergency medical services may be called upon to respond to medical emergencies common to construction and/or operational projects generally. In the event of any situation involving a medical, natural, or security emergency, project staff and/or subcontractors will call 9-1-1 and inform local first responders. First responders will evaluate the situation and help facilitate the correct courses of action. Given the small number of employees required to operate and maintain the Facility, the potential financial burden on the town of Canton to provide such services is expected to be comparatively small.

RRSEC will address impacts on roadways from transportation of heavy equipment in accordance with pre-construction compliance filing, Traffic Control Plans, and road use agreements with the host town and, if requested, St. Lawrence County. These agreements will require RRSEC to restore any roadways impacted by the transportation of Facility components during construction and operation of the Facility. By virtue of these agreements, the town in which the Facility is located will not incur any additional highway maintenance costs related to the Facility other than normal wear and tear associated with the use of non-oversized/overweight vehicles required to transport workers and equipment to and from the Facility Site for operation and maintenance purposes.

More generally, some employees may elect to live in the town in which the Facility is located. However, the impact of these employees and their facilities on town services are expected to be negligible. Moreover, any marginal increase in services is expected to be recovered through the employees' property tax payments.

18.4 IDENTIFICATION OF JURISDICTIONS THAT LEVY REAL PROPERTY TAXES OR BENEFIT ASSESSMENTS OR USER FEES (19 NYCRR § 900-2.19(F))

The Facility is anticipated to result in economic benefits for the following taxing jurisdictions:

- St. Lawrence County
- Town of Canton
- Canton Central School District

18.5 PAYMENTS IN LIEU OF TAXES, BENEFIT CHARGE REVENUES, AND USER CHARGE REVENUES (19 NYCRR § 900-2.19(g))

In exchange for a real property tax exemption, RRSEC expects to execute a PILOT, which would require long-term annual PILOT payments to each taxing jurisdiction identified in Section 18.4. Taxing jurisdictions receiving various forms of payments include St. Lawrence County, the town of Canton, and Canton Central School District. Although the terms of the PILOT have not been finalized, RRSEC estimates that annual PILOT would total approximately $840,000, increasing 2% per year. Table 18.5-1 shows the projected distribution of PILOT Payments to be made to each taxing jurisdictions. Table 18.5-2 summarizes average annual tax revenue projected to be received by taxing jurisdiction, based on RRSEC's internal estimates.

Table 18.5-1 Distribution of PILOT Payments – Standard Methodology – Year 1

Taxing Jurisdiction	Distribution Percentage
Town of Canton	8%
St. Lawrence County	25%
Canton Central School District	67 %

Table 18.5-2 Average Annual Tax Revenue Received (thousands)

Municipality	Average Annual Taxes[1]
Town of Canton	$58
St. Lawrence County	$178
Canton Central School District	$476

[1]Taxes are based on a proposed PILOT of $3,500/MW escalating at 2% for 15-years and subsequent payments based on the New York State Department of Taxation 2022 Solar and Wind Appraisal Model which assumes a 25-year life span, and an estimate of assessed value from year 26-35.

In addition, RRSEC will pay special district taxes to the Canton Fire District and St. Lawrence County (Twn Chrgbks-T/Wide, and Workers Comp Outside). Table 18.5-3 provides estimates for the average annual taxes that would be paid to these special district.

Table 18.5-3 Average Annual Special District Taxes (thousands)

Municipality	Special District	Average Annual Taxes[1]
Town of Canton, St. Lawrence County	Canton Fire District	$33
St. Lawrence County	Twn Chrgbks-T/Wide	$9
St. Lawrence County	Workers Comp Outside	$6

[1] Taxes are based on the New York State Department of Taxation 2022 Solar and Wind Appraisal Model which assumes a 25-year life span.

18.6 COMPARISON OF COSTS TO JURISDICTIONS AND REVENUE GENERATED BY THE FACILITY (19 NYCRR § 900-2.19(h))

RRSEC consulted with the host communities and did not identify any additional costs to local tax jurisdictions. The implementation of a PILOT agreement (see Section 18.5) would result in a net increase in local revenues.

18.7 LOCAL EMERGENCY RESPONSE CAPACITY (19 NYCRR § 900-2.19(i))

RRSEC is also committed to regularly informing and training local first responders about the Facility and its components to respond in the unlikely event of an emergency. RRSEC met with the local fire departments, including the Canton Fire Department, Pyrites Fire Department, and Rensselaer Falls Fire Department on October 5, 2022, to review the Facility design. Based on consultations with the local emergency responders, no new or additional equipment is needed to respond to a fire, hazardous substance, or medical emergency beyond the first aid, medical emergency, and fire vehicles and equipment typically found at rural fire departments. Exhibit 6 Public Health, Safety and Security, along with the Safety Response Plan (see Exhibit 6, Appendix 6-C), provides specific details on the emergency equipment that RRSEC will keep on-site to respond to a fire or medical emergency. The Safety Response Plan also contains fire and emergency responder training and communication plans that will address any training deficiencies.

18.8 STATE SMART GROWTH PUBLIC INFRASTRUCTURE CRITERIA (19 NYCRR § 900-2.19(j))

RRSEC is a privately funded energy project that will not result in the construction or operation of public infrastructure and will not result in unnecessary sprawl and is therefore not subject to ECL § 6-0107. However, this section provides a detailed statement regarding the Facility's consistency with the smart growth criteria in ECL § 6-010.

Criterion 1: To advance projects for the use, maintenance, or improvement of existing infrastructure

The purpose of the Facility is to create an economically viable solar-powered electrical-generating facility that will provide a source of renewable energy to the New York grid, and in doing so, improve the state's existing energy infrastructure. The Facility components include photovoltaic solar panels, inverters, a medium voltage-to-transmission voltage collection substation, battery energy storage, and a switchyard station (ownership to be transferred to New York Power Authority). The Facility will contribute up to 240 megawatts (MW) of renewable energy to the New York grid and a include 20 MW/4-hr battery energy storage system. While the Facility will use

portions of existing state highway infrastructure to transport equipment, none of these activities are anticipated to have any long-term impact on existing infrastructure. Furthermore, the Facility is anticipated to relieve demand on the state's fuel delivery infrastructure by generating non-fuel dependent solar power and reducing the demand for fuel delivery, thereby alleviating fuel delivery constraints.

After careful consideration of its contribution to and utilization of both the New York power grid and transportation routes identified above, it has been determined that the Facility is consistent with this smart growth criterion. Consequently, the necessary changes to the public infrastructure (contribution of renewable energy to power grid, utilization of existing transportation routes and construction of access road intersections to existing roads) are also consistent with the criterion.

Criterion 2: To advance projects located in municipal centers

"Municipal centers" are defined in the Smart Growth Act as "areas of concentrated and mixed land uses that serve as centers for various activities, including, but not limited to, central business districts, main streets, downtown areas, brownfield opportunity areas, downtown areas of local waterfront revitalization program areas, transit-oriented development, environmental justice areas, and hardship areas," as well as "areas adjacent to municipal centers, which have clearly defined borders, are designated for concentrated development in the future in a municipal or regional comprehensive plan, and exhibit strong land use, transportation, infrastructure and economic connections to a municipal center; and areas designated in a municipal or comprehensive plan, and appropriately zoned in a municipal zoning ordinance, as a future municipal center."

Large-scale solar energy projects, such as the Facility, require extensive land; moreover, the requirement for interconnection to high-powered transmission lines restricts large-scale solar energy projects to comparatively isolated rural areas. Therefore, this criterion does not apply to the Facility.

Criterion 3: To advance projects in developed areas or areas designated for concentrated infill development in a municipally approved comprehensive land use plan, local waterfront revitalization plan and/or brownfield opportunity area plan

See discussion of Criterion 2 above. Large-scale solar energy projects such as the Facility cannot be located within areas designated for concentrated infill development, nor are they well-suited to developed waterfront areas or most brownfield opportunity areas. Therefore, this criterion does not apply to the Facility.

Criterion 4: To protect, preserve and enhance the State's resources, including agricultural land, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archaeological resources

RRSEC will generate up to 240 MW of clean, renewable energy and a include 20 MW battery energy storage system without emitting any conventional air pollutants or greenhouse gases (GHGs), or consuming cooling water or generating wastewater while in operation. As described in Exhibit 11 Terrestrial Ecology, the Facility Site is located within NYSDEC Grassland Focus Area 5, which extends along the St. Lawrence valley and north of the Adirondack Mountains. As described throughout this Application, the layout of the Facility was designed through an iterative process in which the technical and economic requirements were weighed against impacts to land use (see Exhibit 3), aesthetics (see Exhibit 8), cultural resources (see Exhibit 9), threatened and endangered species (see Exhibit 12), surface and groundwater (see Exhibit 13), wetlands (see Exhibit 14), and agriculture (see Exhibit 15). Based on implementation of uniform standards and conditions and the inherent constraints on the Facility Site, the proposed layout avoids or minimizes environmental impacts to the greatest extent practicable while allowing RRSEC to construct a 240 MW solar facility in furtherance of the state's renewable energy goals.

Based on these analyses, RRSEC believes that the Facility has avoided and minimized impacts to these resources to the maximum extent practicable (based on the layout as currently proposed), and that any remaining impacts are outweighed by the benefit provided by the Facility's generation of up to 240 MW of clean, renewable energy. Additionally, remaining impacts will also be mitigated as outlined in other exhibits. Therefore, the Facility is consistent with this criterion.

Criterion 5: To foster mixed land uses and compact development; downtown revitalization; brownfield redevelopment; the enhancement of beauty in public spaces; the diversity and affordability of housing in proximity to places of employment, recreation, and commercial development; and the integration of all income and age groups.

See response to Criterion 2 above. The Facility must be located in a rural area well removed from any areas that would potentially experience compact development, downtown revitalization, or significant quantities of housing (e.g., villages and cities). Therefore, this criterion is not applicable.

Criterion 6: To provide mobility through transportation choices including improved public transportation and reduced automobile dependency

The Facility does not directly or indirectly affect transportation options. Therefore, this criterion is not applicable.

Criterion 7: To coordinate between state and local government and inter-municipal and regional planning

RRSEC conducted extensive public outreach to local government and planning agencies throughout the development and review of the Facility (see Exhibit 2). Beginning in 2021, RRSEC initiated a robust public involvement strategy that included consultation with local agencies and municipal representatives and meetings with community members as required under the 94-c permitting process. RRSEC consulted with local municipalities and agencies at a meeting with the Town of Canton and St. Lawrence County on June 22, 2022, and with the Town of Canton on September 16, 2022. RRSEC hosted two open house meetings with community members on July 22, 2021, and July 14, 2022, and engaged in numerous meetings with municipal representatives. To the extent applicable, these outreach efforts and municipal/agency consultations satisfy the criterion related to coordination between state and local governments.

Criterion 8: To participate in community-based planning and collaboration

As described above, RRSEC has conducted and will continue to conduct extensive public outreach to community-based organizations throughout the development and review of the Facility. See response to Criterion 7 for additional detail. These outreach efforts satisfy the criterion related to participation in community-based planning and collaboration.

Criterion 9: To ensure predictability in building and land use codes

RRSEC has no role in or authority over the development or enforcement of building or land use codes in the town of Canton. Therefore, this criterion is not applicable.

Criterion 10: To promote sustainability by strengthening existing and creating new communities which reduce greenhouse gas emissions and do not compromise the needs of future generations by among other means, encouraging broad-based public involvement in developing and implementing a community plan and ensuring the governance structure is adequate to sustain its implementation

RRSEC is consistent with state policies designed to encourage initiatives that reduce GHG emissions and contribute to the transition of New York's energy markets by encouraging renewable alternatives and helping the state meet its goal of achieving 70 percent of energy generated from renewable sources. RRSEC promotes the reduction of GHG emissions through the use of renewable energy. RRSEC, therefore, supports this smart growth criterion.

Criterion 11: To mitigate future physical climate risk due to sea level rise, and/or storm surges and/or flooding, based on available data predicting the likelihood of future extreme weather events, including hazard risk analysis data if applicable.

The Facility is consistent with the state's efforts to expand reliance on renewable energy sources and reduce GHG emission. New York State enacted the Climate Leadership and Community Protection Act to combat climate change through a modernized electric system that improves efficiency, affordability, resiliency, and sustainability. The Climate Leadership and Community Protection Act increased the state's clean energy goal from 50% renewables to 70% renewables by 2030. Solar power is a renewable energy source that expands available power generation capabilities without increasing GHG emissions. The addition of a solar power project also will result in a decrease in existing GHG emission levels as solar power displaces generation from fossil fuel facilities. Therefore, RRSEC will be consistent with Smart Growth Criterion 11.

18.9 HOST COMMUNITY BENEFITS (19 NYCRR § 900-2.19(k))

RRSEC will provide positive impacts to public welfare through employment opportunities, specifically by generating temporary construction employment as described in Section 18.1. To provide opportunities for local residents to benefit from economic opportunities associated with the clean energy transition in New York State, RRSEC's parent company EDF Renewables has developed the EDF Renewables Trades and Clean Energy Scholarship program. Through this program, EDF Renewables seeks to award a $2,000 scholarship annually for 10 years for two students who intend to apply for a post-secondary program that either: (a) incorporates one of the trades that is needed for the build-out of renewable energy projects, or (b) includes a renewable energy component. The goal of the scholarship is to assist and encourage students to pursue careers in the trades and renewable energy, recognizing that (a) funding streams for these pathways may be difficult to find, and (b) there will be a rapid increase in demand for labor associated with renewable energy in the coming years. EDF Renewables implemented the scholarship in the 2021/2022 school year, and is actively working with the Canton Central School District to implement the scholarship for upcoming school years.

RRSEC will also result in increased revenues to county, local municipality, and school district tax bases, and lease and easement revenues to participating landowners. As described in Exhibit 17 Consistency with Energy Planning Objectives, the Public Service Commission's Host Community Benefit Program will provide direct credit to residential electric utility customers within host communities, which provides benefits to utility customers in the host communities where RRSEC is located. When a facility is located within multiple host communities, the benefit will be split equally among residential electric utility customers in each community. RRSEC would support the Renewable Energy Facility Host Community Benefit Program (PSC 20-E-0249) by paying an annual fee of $500 per MW or $120,000 for the first 10 years of operation.

Additionally, EDF Renewables developed a Community Benefit "Sharing the Sun" Fund. Once RRSEC enters its operational phase, EDF Renewables will launch the fund, which makes available $30,000 annually for 10 years to be spent on local, community-driven initiatives in the project area. Community organizations must apply to be considered for funding, and awards will be determined by a committee composed of community members.

18.10 UNIFORM STANDARDS AND CONDITIONS

Table 18.10-1 identifies the applicable uniform standards and conditions for this exhibit.

Table 18.10-1 Applicable Uniform Standards and Conditions for Socioeconomics

Citation	Uniform Standards and Conditions
900-6.1(f)	Host Community Benefits. The permittee shall provide host community benefits, such as Payments in Lieu of Taxes (PILOTs), other payments pursuant to a host community agreement or other project(s) agreed to by the host community.
900-6.2(a)(2)	Pre-Construction Notice Methods. At least fourteen (14) business days prior to the permittee's commencement of construction date, the permittee shall notify the public as follows: (2) Provide notice to local Town and County officials and emergency personnel;

18.11 REFERENCES

Office of the New York State Comptroller. 2022. Financial Data for Local Governments; Select Data: Level 2 – Level 1 data with extra level of detail; Select Report: Counties, Schools, and Towns; Select Year: 2010 and 2019. Accessed online at: http://wwe1.osc.state.ny.us/localgov/findata/financial-data-for-local-governments.cfm. Accessed on September 2, 2022.