### RBEFORE THE CORPORATION COMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF BRANDY L. WREATH,	)	
DIRCTOR OF THE PUBLIC UTILITY	)	CAUSE NO. PUD 202100090
DIVISION OF THE OKLAHOMA	)	
CORPORATION COMMISSION, FOR A	)	EILEN
SHOW CAUSE HEARING AGAINST	)	
OLYMPIA RENEWABLE PLATFORM, LLC	)	JUN 1 6 2021
		COURT CLERK'S OFFICE - OKC CORPORATION COMMISSION OF OKLAHOMA

### RESPONDENT'S PRELIMINARY SAFETY AND FACILITY SECURITY PLAN

COMES NOW the Respondent, Olympia Renewable Platform, LLC, and submits the Preliminary Safety and Facility Security Plan which is attached hereto as Exhibit 1, in satisfaction of Order Number 718731 in the above reference matter.

Respectfully submitted

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**ATTORNEYS FOR OLYMPIA** 

RENEWABLE PLATFORM, LLC

### **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing was mailed by regular U.S. Mail, with postage pre-paid, on or before the \( \frac{10}{6} \) day of June, 2021, to the following:

Jared B. Haines, Utility Regulatory Unit Chief A. Chase Snodgrass, Assistant Attorney General Office of the Oklahoma Attorney General 313 Northeast 21<sup>st</sup> Street Oklahoma City, Oklahoma 73105 Utility.Regulation@oag.ok.gov

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Derek J. Hardberger

Turbine ID	Primary Deficiency	Number of Broken Blades	Action Priority	Anticipated Action Plan	Contractor Assigned	Status
N1 T6	Broken Blades	3	5	Remove all blades and replace; secure hub assembly		
N1 T20	Broken Blades	1	4	Remove all blades and replace; secure hub assembly		
N1 T21	Broken Blades	1	7	Remove all blades and replace; secure hub assembly		
N1 T22	Broken Blades	2	8	Remove all blades and replace; secure hub assembly		
N1 T23	Broken Blades	1	9	Remove all blades and replace; secure hub assembly		
N1 T29	Broken Blades	1	2	Remove all blades and replace; secure hub assembly		
N1 T31	Broken Blades	2	3	Remove all blades and replace; secure hub assembly		
N1 T16	Burnt Nacelle	1	1	Fell the tower unless method to safely secure and remove nacelle is approved		
N1 T26	Burnt Nacelle	1	6	Fell the tower unless method to safely secure and remove nacelle is approved		



#### Comments:

"Burnt Nacelle" is a major challenge in decommissioning due the fact that the fire has damaged and compromised the structural integrity of the nacelle. The most prudent action plan is to use a drone to determine if the relevant structures are intact. If so, nacelle removal will be performed by crane if it is determined that it is safe for technicians to secure the nacelle to the crane for removal. If that is not possible, then the tower will be felled.

"Potential Shedding" means that debris and parts may separate from the structure and fall to the ground around the tower. Due to their weight, debris and parts typically fall directly below their separation point. Occasionally, carbon-fiber composite materials can fall deviating from straight fall, mostly due to heavy wind, but typically not more than fifty (50) feet or so.

### **Facility Security Plan**

The Facility Security Plan is based on the following considerations:

- The condition of the generating unit
- The distance of the unit from a public road
- Whether current fences exist between the generating unit and the public road
- Whether a gate exists at the generating unit access road

Facility security activities will be completed within thirty (30) days unless not feasible, whereupon we will contact OCC PUD to discuss timing updates and other options.

Installed fencing will be periodically inspected and maintained as necessary.

Turbine ID	Location/Access Description	Safety Plan Action Items
N1 T6	Approx. 0.75 miles from public road; facility access road is not gated	Place gate at facility access road with informative sign on gate

N1 T16	Approx. 200 yards from public road; access road not gated.	Place gate at facility access road with informative sign on gate; place informative signs on current fence; if no current fence exists, install temporary safety fence around unit
N1 T20	Approx. 0.4 miles from public road; facility access road is not gated	Place gate at facility access road with informative sign on gate; place informative signs on current fence; if no current fence exists, install temporary safety fence around unit
N1 T21	Approx. 0.4 miles from public road; facility access road is gated	Place informative sign on gate
N1 T22	Approx. 0.75 miles from public road; facility access road is gated	Place informative sign on gate
N1 T23	Approx. 1 mile from public road; facility access road is gated	Place informative sign on gate
N1 T26	Approx. 0.4 miles from public road; facility access road is gated	Place informative sign on gate
N1 T29	Approx. 200 yards from public road; facility access road is not gated	Place gate at facility access road with informative sign on gate; place informative signs on current fence; if no current fence exists, install temporary safety fence around unit
N1 T31	Approx. 250 yards from public road; facility access road is not gated	Place gate at facility access road with informative sign on gate; place informative signs on current fence; if no current fence exists, install temporary safety fence around unit

The informative sign on facility access gates will be at least four (4) square feet and contain the following language in plainly visible text:

DANGER! ¡PELIGRO!

POTENTIAL FALLING EQUIPMENT

NO TRESSPASSING

**AUTHORIZED ACCESS ONLY** 

The proposal above is dependent on access and cooperation from the landowners. If changes or modifications to the above-proposed items are required (per facts or landowner input), we will advise OCC. The safety plan action items will be removed as each turbine is either repaired or removed.