



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

1001.12 Exhibit 12

Construction

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Exhibit 12: Construction

12(a) Quality Assurance and Quality Control Plan

An on-site construction team will handle materials, construction, and quality control for the Project. The Engineering, Procurement, and Construction (EPC) Contractor will manage local and outside (as needed) subcontractors to complete construction. Throughout construction, communication will continually occur between Project development and construction staff. Danskammer will staff a full-time, on-site construction manager for daily collaboration with the EPC Contractor. The on-site construction manager will coordinate ongoing communication with local officials, citizens groups, and landowners, and manage other aspects of the proposed Project, as needed. The on-site construction manager will also maintain the following responsibilities, including but not limited to:

- Safety and Environmental Performance,
- Schedule, Cost, and Quality Performance,
- Project Plan of the Day,
- Revenue Performance,
- Monthly Management Meetings,
- Overall Project Direction,
- Contracts Administration, and
- EPC Contractor Guidance and Quality Control.

Danskammer's on-site construction manager will maintain full authority and responsibility for the EPC Contractor, subcontractors, and associated quality control measures.

Danskammer will conform to the requirements of the Occupational Safety and Health Administration (OSHA), EPA, and other relevant regulations in New York State to ensure the safety of on-site personnel and the public. Safety training will be required for personnel working on site.

In addition to the on-site construction manager, there will be multiple staff with roles to ensure timely, safe, and efficient use of resources and labor. Each supporting personnel has specific responsibilities related to the Project. Each support personnel and a brief description of their accountabilities in relation to the Project is described below:

- **Project Engineer** – Provides support and quality control for the Project’s engineering team. Communicates requests for information and engineering change notices to the construction team if there are questions. A prompt resolution of engineering inquiries is important to keep the Project on schedule.
- **Project Controller** – Keeps track of Project cost controls, risks, and capital forecasting. Monitors the Project schedule and reports effects on the Project and its associated costs.
- **Operations Plant Lead and Start-up Operations Transition** – As construction comes to a close, this role becomes paramount to ensure the construction team changeover to the operations team is quick, safe, and efficient. This support person ensures a fluid transition from construction to commissioning activities.
- **Civil/Environmental** – Interacts with permitting staff to ensure requirements have been met and detects and resolves deficiencies. Reviews work in accordance with design standards and oversees environmental compliance.
- **Electrical** – Coordinates and monitors electrical contractor’s work. Monitors and coordinates electrical and ground testing. Assesses deficiencies and their associated resolutions.
- **Logistics and Materials** – Ensures Project equipment and materials are delivered efficiently to the site in accordance with the Project schedule.
- **Site/Safety Coordinator** – Ensures site safety for staff on site. Maintains weekly performance metrics, logs contractor documents, and drawings.
- **Site General Support** – Helps various support personnel.
- **Site Administration** – Manages and transmits Project documents. Helps with business management and administration for the Project Manager and other associated support staff.

The Danskammer Energy Center Quality Assurance and Quality Control Plan (QAQC Plan) can be found in Appendix 12-1 of this Application. The EPC Contractor will abide by the necessary requirements (or similar) to those listed in this document, as well as maintaining the standards of Danskammer’s development and construction personnel. While Danskammer will provide general oversight, the EPC contractor will be primarily responsible for QAQC implementation and will provide all trained and qualified QAQC personnel. The EPC Contractor will provide a QAQC Plan including the requirements listed in this section (or similar).

(1) Accountabilities and Oversight

Danskammer and its contractors and subcontractors must maintain quality controls during Project development, construction, and operation. Additionally, the EPC Contractor will document, conform, inspect, and test work to ensure it complies with Project specifications. The comprehensive QAQC Plan, provided by the EPC Contractor, combined with the quality oversight of Danskammer's team will ensure that the Project meets high quality and safety metrics.

(2) Project Organization

The EPC Contractor will organize personnel to ensure a responsible construction team committed to quality and safety. This effective structure will contain appropriate personnel to facilitate the construction of the Project including managers, engineers, superintendents, inspectors, foremen, and quality personnel. Each employee has the responsibility to implement quality processes throughout the construction process. Non-conforming work with the established level of quality and Project specifications will be corrected appropriately.

Process Controls

Process controls ensure that work is completed safely and consistently and meets quality expectations. Project meetings, daily planning meetings, and monthly management meetings are examples of Project Controls that efficiently help address responsibilities and ensure the Project moves along the schedule. Meetings will cover the necessary aspects of Project information, from daily construction activities to safety and emergency agendas to the resolution of on-site construction challenges.

Design Control

Plans and drawings will be perused to ensure construction has been completed accurately and safely. The engineering team will clarify when further information is needed for construction completion. The Engineer of Record Design must first accept and approve deviations.

Document Control

Project documents will follow a controlled and defined system to ensure proper collection, storage, transmittal, and submission. Project closeout documentation will be provided to Danskammer as a Project deliverable. Danskammer will establish specific reporting and timelines with the EPC Contractor.

Training

On-site personnel will use both internal and external training resources to ensure the consistency and completeness of job site training efforts. Project employees must have safety training and abide by the necessary regulations as set forth by OSHA and other relevant New York State safety regulations; records of training will be kept on file for Project employees.

Subcontractor Evaluations

Project subcontractors will be assessed on performance, safety, capability, and quality of work. This continual information gathering can help to assess the subcontractor's suitability for present and future work. Subcontractors used for the Project are subject to audit and performance review at any point throughout the Project.

Material Management

Materials delivered or supplied for the use of construction of the Project will be in quality compliance with manufacturer and Project specifications. The handling and storage of materials will be in accordance with manufacturer recommendations to ensure that the quality of the material is not compromised.

Inspection and Testing

Inspections and testing will be carefully performed according to manufacturer, engineering, and Project specifications. Danskammer will develop internal and external quality checklists specific to the Project, bearing in mind the potential for third-party testing contractors. Inspection and testing documents will be created and kept to ensure material, system, and Project component quality.

(3) Calibration

To ensure that work is performed within technical requirements, tooling and equipment must be accurate. Tooling and equipment will be calibrated according to applicable standards. A record of calibration results will be documented and kept on file.

(4) Nonconformance

Materials, work, and products can be inspected and tested to determine the level of conformance with manufacturer, engineering, and Project specifications. Non-conforming Project components will be subject to rejection, repair, reworking, and/or replacement. When

required, the EPC Contractor and Danskammer will collaborate to evaluate the nonconformance and decide a resolution.

(5) Auditing

Quality audits assess the effectiveness of the quality program and drive continuous improvement efforts. The audit process will use findings to drive efficiency and increase quality control efforts as needed throughout the Project's progress.

(6) Project Delivery

The Project will be built according to the plans, designs, manufacturer specifications, engineering standards, and contract standards. Regular alignment meetings between Danskammer and the EPC Contractor will the Project is progressing as expected. Additionally, testing and inspections will assure that quality is up to standards. The EPC Contractor will deliver the Project components taking the necessary precautions to ensure that on-site employees and the general public stay safe throughout construction. Danskammer views public safety as its most important responsibility.

Prior to the proposed Project operations phase, operations and maintenance staff will be integrated into the construction phase. The construction manager and operations and maintenance staff manager will work in tandem to transition smoothly from construction to operations.

12(b) Company Official Statement

(1) Protection of Underground Facilities

Danskammer and its contractors will meet the requirements of Public Service Law §119-b, as implemented by 16 NYCRR Part 753 to protect underground facilities to assure public safety and to prevent damage to public and private property. Appendix 12-2 includes a signed statement indicating compliance.

(2) Pole Numbering and Marking Requirements

Danskammer and its contractors will adhere to the pole numbering and marking requirements set forth in Public Service Law implemented by 16 NYCRR Part 217. Appendix 12-2 provides a signed statement indicating compliance.

12(c) Preliminary Plans to Avoid Interference with Existing Utility Systems

Danskammer anticipates using the existing utility systems to the extent practical, so there should be no impacts to utility systems outside the vicinity of the proposed new construction.

Danskammer is compiling and consolidating utility information within the Project Site. The existing/operating utility systems both above and underground are being identified and designated as electric, communication, natural gas, etc. This identification is being completed through the use of a surveying contractor in collaboration with local utilities. Danskammer and/or EPC Contractor will submit a request for information with Dig Safely New York to receive the documented buried utilities within the Project Area. The safety of on-site personnel and the prevention of damages to existing/operating utilities is a top priority of Danskammer.

Upon completion of the surveys for utilities in the Project Area, Danskammer will collaborate with the utilities located in the Project Area to ensure minimal interference. Preliminary design drawings with utility information are provided in Appendix 11-1. Danskammer will determine separation distances from the proposed new infrastructure from existing electric, gas, and communications infrastructure.

If Danskammer is unable to entirely avoid interference with existing utility infrastructure, Danskammer will work to design and construct the Project safely and without interference to existing/operating utility components. In areas where conflicts are expected between existing utility lines and proposed construction activities, additional utility identification methods will be used to confirm utility locations. In areas where any piping/conduits lay aboveground, these lines will be clearly demarcated and protected from construction activities. Danskammer will adhere to the requirements set forth by Dig Safely New York and will work with the utility owners to ensure that there is minimal interference with existing utilities.

To fully ensure that the presence of underground utilities has been identified after surveyor mark-outs, a geophysical subcontractor may be required to physically survey the site and confirm the utility locations with appropriate instrumentation.

In areas where conflicts are expected between existing utility lines and proposed construction activities, additional utility identification methods will be used to confirm utility system locations. For example, ground-penetrating radar could be used and/or test holes may be dug prior to excavation. In sensitive locations, excavations may be hand dug as opposed to using

excavating machines. In areas where any piping/conduits lay aboveground, these lines will be clearly demarcated and protected from construction activities.

12(d) Procedures to Address Public Complaints

Danskammer has generated a formal Complaint Resolution Plan (Appendix 12-3) that will address public complaints during the construction and operation of the Danskammer Energy Center. Listed in the Complaint Resolution Plan are specific procedures for where to submit a complaint and the information required to properly resolve the complaint. This Plan has been submitted to the Town of Newburgh for comment. Any comments received will be filed as a supplement to this Application.

(1) Project Complaint Log

Danskammer will keep a thorough log of each complaint and its associated resolution. The complaint log will be maintained during construction by Danskammer and, upon request, can be made available to DPS Staff. A copy of the Complaint Resolution Plan can be found in Appendix 12-3 of this Application. The Complaint Resolution Plan provides further details in addressing and resolving public complaints throughout the construction and operation of the Project.

(2) Actions for Unresolved Complaints

A Project Representative will attempt to respond to reasonable inquiries within 72 hours (during normal business hours) of the receipt of an inquiry. A record of the steps taken to resolve each complaint will be kept by Danskammer. This record will include complaints received, resolution of said complaints, and unresolved complaints (if applicable).

In the case that a resolution cannot be delivered within 60 days, a timeline and measures to be taken will be provided to the complainant. The complaint resolution process is limited to reasonable and objectively practical complaints. If Danskammer has determined that a complaint does not have a reasonable resolution, Danskammer will add the complaint to the complaint log, notify the complainant that no resolution is feasible. Danskammer will then recommend the complainant contact DPS if he or she disagrees with Danskammer's assessment. If the DPS suggests that further action is required by Danskammer, then Danskammer will refer the complaint to a neutral third party. The recommendation of the neutral third party would be provided to Danskammer, the complainant, and to the DPS and the recommendation would be implemented, unless arbitrary and capricious.

(3) Submitting a Complaint

Complaints will be accepted by phone, email, or in writing. A written complaint form can be submitted by mail to the following address: Danskammer Energy, LLC, 181 South Plank Road, Newburgh, New York 12550. Oral complaints received during construction will be converted to written documents that can be reported in the tracking log.

(4) Unique Procedures and Protocols

No less than 2 weeks prior to the commencement of construction, Danskammer will publish a summary of the Complaint Resolution Plan in newspapers, including local community and general circulation newspapers as listed in Danskammer's PIP Plan, as will serve substantially to inform the public of the Complaint Resolution Plan. The Complaint Resolution Plan will be provided to the Newburgh Town Board. The Complaint Resolution Plan will also be posted on Danskammer's website and will be available to the public at the repositories listed in the PIP Plan.

12(e) Procedures to Communicate Construction Plans, Schedules, and Safety and Security Measures

No less than 2 weeks prior to the commencement of construction, Danskammer will publish a construction schedule and safety and security measures in newspapers, including local community and general circulation newspapers, as will serve substantially to inform local stakeholders of such construction plans and safety and security measures. A list of these newspapers has been established and identified in Danskammer's PIP Plan.

APPENDIX 12-1

PRELIMINARY QUALITY ASSURANCE AND CONTROL PLAN



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

APPENDIX 12-1

Preliminary Quality Assurance and Control Plan

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1.0 PROJECT INFORMATION

Danskammer Energy, LLC (the Applicant) is proposing to repower its existing 532-megawatt (MW) Danskammer Generating Station site located in the Town of Newburgh, Orange County, New York with the Danskammer Energy Center (the Project), a state-of-the-art natural gas-fired combined-cycle power generation facility with an optimal net capacity of approximately 536 MW. This new facility will provide a more efficient and cost-effective facility to produce electricity while reducing existing environmental impacts on the surrounding communities and providing tax benefits into the future.

2.0 INTRODUCTION

The Applicant, has prepared this Quality Assurance and Control Plan (the Plan) to establish a consistent method and procedures by which the Applicant will ensure quality throughout the construction and operation of the Project. This plan will include detailed guidelines to ensure the quality of Project aspects including oversight, organization, process controls, design, documentation, training, evaluation, materials, inspection and testing, calibration, nonconformance, auditing, and project delivery. This Plan will remain in effect during the life of the Project and will conform to the necessary guidelines and regulations. The Project will implement an effective quality system and associated quality controls focused on problem prevention.

3.0 QUALITY CONTROL

An Engineering, Procurement, and Construction (EPC) Contractor will maintain and implement the Plan with the guidance of the Applicant's on-site construction manager. The EPC Contractor will provide an effective organizational structure to ensure a responsible construction team with a commitment to quality and safety. This effective structure will contain appropriate personnel to facilitate the construction of the Project including managers, engineers, superintendents, inspectors, foremen, and quality personnel. Each employee has the responsibility to implement quality processes throughout the construction process. Non-conforming work with the established level of quality and Project specifications will be corrected appropriately.

3.1 Plan Implementation and Oversight

The Applicant and its contractors and subcontractors will be responsible for maintaining quality controls during the development, construction, and operation of the Project. The EPC Contractor will maintain documentation, conformance, inspection, and testing of work to ensure that work on

site has been completed in accordance with Project specifications. The EPC Contractor, in conjunction with the quality oversight of the Applicant's team, will ensure that work adheres to high quality and safety metrics of the Plan.

3.2 Quality Team Personnel

The Applicant will have an on-site construction team to handle materials, construction, and quality control for the Project. The EPC Contractor will manage local and, as needed, outside subcontractors to complete construction. Throughout the construction phase, ongoing coordination will occur between the Project development and the construction teams. The Applicant will maintain a full-time, on-site construction manager to collaborate daily with the EPC Contractor. The on-site construction manager will help coordinate aspects of the proposed Project, including ongoing communication with local officials, citizens groups, and landowners. The on-site construction manager will also maintain the following responsibilities including but not limited to:

- Safety and Environmental Performance,
- Schedule, Cost, and Quality Performance,
- Project Plan of the Day,
- Revenue Performance,
- Monthly Management Meetings,
- Overall Project Direction,
- Contract Administration, and
- EPC Contractor Guidance and Quality Control.

The Applicant's on-site construction manager will maintain full authority and responsibility for the EPC Contractor, subcontractors, and associated quality control measures.

In addition to the on-site construction manager, there will be a number of personnel with various accountabilities to ensure timely, safe, and efficient use of resources and labor. Each supporting personnel has specific responsibilities related to the Project. Below is a list of each support personnel and a brief description of their accountabilities in relation to the Project:

- **Project Engineer** – Provides support and quality control to the engineering team for the Project. Communicates requests for information and engineering change notices to the

construction team should there be any questions with field construction. Timely resolution of engineering inquiries is imperative to continue driving the Project schedule.

- **Project Controller** – Tracks cost controls, risks, and capital forecasting in relation to the Project. Monitors updates to the Project schedule and reports effects to the Project and its associated costs.
- **Operations Plant Lead and Start-up Operations Transition** – Typically brought in near the end of construction to ensure a quick, safe, and efficient transition from the construction team to the operations team. This support person ensures the end of construction and transition into commissioning activities are completed smoothly.
- **Civil/Environmental Lead** – Interfaces with permitting to ensure the requirements have been met. Identifies and resolves deficiencies. Performs review and quality assurance of work in accordance with design standards. Oversees compliance with environmental requirements.
- **Electrical Lead** – Coordinates and monitors electrical contractor's work. Monitors and coordinates electrical and ground testing. Assesses deficiencies and their associated resolutions.
- **Logistics and Materials Lead** – Ensures the efficient delivery of Project equipment and materials on site in accordance with the Project schedule.
- **Site/Safety Coordinator** – Manages weekly performance metrics, logs contractor documents and drawings, and maintains site safety.
- **Site General Support** – Assists and supports various support personnel.
- **Site Administration** – Manages and transmits Project documents. Assists with the business management and administrative duties of the Project Manager and other associated support staff.

4.0 PROCEDURES

4.1 Process Control

Process controls will ensure that work is completed in a safe, consistent, and quality manner. Project Controls, such as project meetings, daily planning meetings, and monthly management meetings, will be used to address responsibilities and ensure the timely construction and management of the Project.

4.2 Design Control

Plans and drawings will be thoroughly reviewed to ensure the completeness of construction. The engineering team will clarify instances of construction that require further information for completion. Any design deviations that may occur during construction will first be reviewed, accepted, and approved by the Engineer of Record prior to execution.

4.3 Document Control

Procedures for maintaining documents will be determined by the Applicant and the EPC Contractor. Project documents will be collected, stored, transmitted, and submitted in a controlled and defined manner. Project closeout documentation will be provided to the Applicant as a Project deliverable. Specific reporting and timelines will be established between the Applicant and the EPC Contractor.

4.4 Training

Internal and external trainings will be provided for on-site personnel to ensure the safety, consistency, and completeness of work throughout construction. Training records will be kept and maintained for Project employees by the EPC Contractor. Project employees must have safety training and abide by the necessary regulations as set forth by OSHA and other relevant New York State safety regulations.

4.5 Subcontractor Evaluations

Subcontractors working on the Project will be assessed on various factors including performance, safety, capability, and quality of work. This continual information gathering will help to assess the subcontractor's suitability for present and future work. Subcontractors used for the Project are subject to audit and performance review throughout the development and construction process.

4.6 Materials Management

Materials delivered or supplied for the use of construction of the Project will be in quality compliance with manufacturer and Project specifications. The handling and storage of materials will be in accordance with manufacturer recommendations to ensure that there is no compromise in the quality of the material.

4.7 Inspection and Testing

Inspections and testing will be completed in a controlled manner in accordance with manufacturer, engineering, and Project specifications. Both internal and external quality checklists will be established and used, as well as the potential for third-party testing contractors when necessary. Inspection and testing documentation will be generated and stored to assure the quality of materials, systems, and Project components.

4.8 Calibration

The accuracy of tooling and equipment is absolutely necessary to ensure that work is performed within technical requirements. Calibrations will be completed in accordance with applicable standards and will be documented to maintain a record of calibration results.

4.9 Nonconformance

Materials, work, and products are subject to inspection and testing to determine the level of conformance with manufacturer, engineering, and Project specifications. Non-conforming Project components will be subject to rejection, repair, reworking, and replacement. When required, an evaluation of the resolution will be decided collaboratively with the EPC Contractor and the Applicant.

4.10 Auditing

Quality audits will be performed and documented at regular intervals determined by the Applicant and EPC Contractor. These audits should be performed to measure the effective application of the quality program and to drive continuous improvement efforts. Findings in the audit process will be used to drive efficiency and further quality control efforts as the Project progresses.

5.0 PROJECT DELIVERY

The Project will be constructed according to plans, designs, manufacturer specifications, engineering standards, contract standards, and expectations. Constant alignment meetings with

the Applicant and the EPC Contractor will take place to assure that expectations are being met. Additionally, testing and inspections will assure that quality standards and expectations are being met. The EPC Contractor will deliver the Project components taking the necessary precautions to ensure that on-site employees and the general public stay safe throughout construction. Public safety is a high priority for the Applicant.

Before the proposed Project becomes fully operational, the operations and maintenance staff will be integrated into the construction phase. The construction manager and operations and maintenance staff manager will work together continuously to ensure a smooth transition from construction to operations.

APPENDIX 12-2

COMPANY OFFICIAL STATEMENT



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

APPENDIX 12-2

Company Official Statement

COMPANY OFFICIAL STATEMENT

Danskammer Energy, LLC, agrees to conform to the requirements for protection of underground facilities contained in Public Service Law §119-b, as implemented by 16 NYCRR Part 753. Further, Danskammer Energy, LLC will comply with pole numbering and marking requirements, as implemented by 16 NYCRR Part 217.

Signature of Responsible Danskammer Official:



William Reid
Chief Executive Officer
Danskammer Energy, LLC
135 E. 57th Street, 15th Floor
New York, New York 10022

APPENDIX 12-3

COMPLAINT RESOLUTION PLAN



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

APPENDIX 12-3

Complaint Resolution Plan

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1.0 COMPLAINT RESOLUTION PLAN

Danskammer Energy, LLC (the Applicant) has prepared this Complaint Resolution Plan (the Plan) to establish a procedure by which the Applicant will address public complaints regarding the construction and operations of the Danskammer Energy Center (the Project) in a timely and consistent manner. Activities will be performed in accordance with applicable federal, state, and local rules, regulations, and agreements.

2.0 PROCEDURE FOR SUBMITTING COMPLAINTS

Complaints will be accepted by phone, email, or in writing by following the procedures below:

- Submit a complaint verbally by calling the Applicant's designated complaint line and leaving a detailed complaint.
- Submit a complaint in writing by mailing a detailed complaint to the Applicant's local office mailing address.
- Submit a complaint in writing by emailing a detailed complaint to the Applicant's local office email address.

In order for the Applicant to properly and sufficiently address a complaint, the complaint should be as detailed as possible and include the information below:

- Name of complainant;
- Date of complaint;
- Phone number;
- Address;
- Location of issue; and
- Detailed description of complaint (if possible, include date and time the issue occurred, exact location of issue, duration, and any other details that can help pinpoint the issue).

The Complaint Resolution Form used to submit a complaint by mail is included at the end of this Plan.

3.0 RESOLUTION OF COMPLAINTS

The Applicant will keep and maintain a complaint log during the construction of the Project. A Project Representative will attempt to address reasonable complaints within 72 hours of receipt of an inquiry. Upon receiving a complaint, the complaint and associated information will be

entered into the complaint log and a plan of action for the complaint will be determined. The Applicant will maintain a record of the steps taken to resolve the complaint. The applicant will maintain records of complaints received, resolution to said complaints, and, if applicable, unresolved complaints. The Applicant will work in good faith to address and/or resolve reasonable complaints as soon as reasonably practicable and commits to resolving complaints within 60 days. If the complaint cannot be resolved within the 60-day time period, information regarding the timeline and steps taken to resolve the complaint will be provided to the complainant.

4.0 DISPUTE RESOLUTION AND UNRESOLVED COMPLAINTS

The complaint resolution process will be limited to reasonable and objectively practical complaints. If the Applicant has determined that a complaint does not have a reasonable resolution, the Applicant will add the complaint to the complaint log, notify the complainant that no resolution is feasible, and recommend the complainant contact the New York State Department of Public Services (DPS) if he or she disagrees with the Applicant's assessment. If the DPS suggests that further action is necessary on the part of the Applicant, the Applicant will refer the complainant to a neutral third party. The recommendation from the neutral third party would be provided to the Applicant, the complainant, and the DPS, and the recommendation would be implemented, unless arbitrary and capricious.

5.0 DOCUMENTATION OF COMPLAINTS

During construction and operation of the Project, the Applicant will keep a complaint log that records complaints that it receives. The information maintained in the complaint log will include, if provided, the name of the complainant, date of the complaint, the complainant's contact information, and a detailed description of the complaint. It will also include a description of and steps that have been taken to resolve the complaint, if resolution is feasible. The complaint log will be maintained by the Applicant and will be made available to the DPS upon request.

6.0 PUBLIC NOTIFICATION OF COMPLAINT PROCESS

No less than 2 weeks prior to the commencement of construction, the Applicant will publish a summary of the Complaint Resolution Plan in local community and general circulation newspapers, which will serve substantially to inform the public of the Complaint Resolution Plan. The summary will include the Applicant's contact information including phone numbers, email, and physical addresses for the Applicant's local office. The Plan will be provided to the Newburgh Town Board and will also be posted on the Applicant's website.

