

Appendix A – Bidder Response Form

Section 83E

Request for Proposal

Application Form

Applicant Information

Applicant: Bear Swamp Power Company LLC

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Instructions for Distribution Project Bid Packages

As described in Section **Error! Reference source not found.**, bidders may submit multiple Distribution Project proposals as part of a bid package that could include common aspects for each bid (e.g. bidder experience). Even though there may be common bid aspects, each project proposal shall be considered separately.

For these Distribution Project packages, bidders should submit one copy of Appendix A: Bidder Response Package that provides information for the common aspects of the bid package. These common aspects are described below, both as to the RFP and the Appendix A. Bidders should only provide multiple versions of specific Appendix A subsections, as required, for each individual project.

For example, if a bidder has one Transmission Project (Project A) and three distribution projects (Projects B, C, D), the Bidder should submit one complete Bidder Response Form for Project A, one Bidder Response Form with all Common Distribution responses for Project B, C, and D, and individual Bidder Response subsections for each Project B, C, and D.

Stage 1 - Eligibility, Threshold, and Other Minimum Requirements	Distribution Project versus Transmission Project
2.2.1.1 Eligible Project Size	Minimum bid size greater than 1MW; Bidders may submit multiple projects (i.e. a portfolio of projects) which must clearly define each project size; Bidders submitting multiple Distribution Projects can make any of their Distribution Projects contingent upon other proposals within this solicitation. Bidders may not submit proposals that are positively contingent on circumstances outside the acceptance of a proposal in this solicitation (e.g., proposals accepted in solicitations in other states). Bids cannot be contingent on prior approved long-term contracts.
2.2.1.2 Eligible Commercial Operation Date and Other Requirements	SMART projects are not eligible to participate in this solicitation; projects must enroll in the interconnecting Distribution Company's Wholesale Distribution Tariff; projects must enroll in the Operational Parameters for Energy Storage Systems Tariff; COD requirement same as Transmission

2.2.1.3 Pricing Requirements Conforming Forms of Pricing	See requirements for Environmental Attribute LTCs
2.2.1.4 Bidder Disclosure of Affiliations and Affiliate Relationships	Same requirements as Transmission projects
2.2.1.5 Contract Term	Same requirements as Transmission projects
2.2.1.6 Capacity Requirements	Distribution Projects must include a commitment to take the steps outlined in the ISO-NE tariff to screen for and, if applicable, establish equivalent Capacity Network Resource Capability.
2.1.1.7 Delivery Requirements	Same requirements as Transmission projects
2.2.1.8 Interconnection Requirements	Distribution Project proposals must include a commitment to take the necessary steps to qualify for equivalent Capacity Network Resource Capability, as defined by ISO-NE.
	I.3.9 approval needed or describe why approval is not necessary. All technical reports or system impact studies should approximate the ISO-NE interconnection process, including but not limited to clear documentation of study technical and cost assumptions, reasoning, and justification of such assumptions.
	Same requirements as Transmission projects as applicable
2.2.1.9 Proposal Completeness: Bidder Response Forms, Form LTCs, and Form MOU	Bidders of Distribution Projects will be provided a standard form long-term contract that will not be negotiable.
2.2.1.10 Bid Fees	Same requirements as Transmission projects
2.2.2.1 Facilitate Financing of Energy Storage Systems	Same requirements as Transmission projects
2.2.2.2 Site Control and Other Agreements	Same requirements as Transmission projects

2.2.2.3 Technical and Logistical Viability	Same requirements as Transmission projects
2.2.2.4 Ability to Finance the Proposed Project	Same requirements as Transmission projects
2.2.2.5 Bidder Experience	Same requirements as Transmission projects
2.2.2.6 Providing Enhanced Electricity Reliability within the Commonwealth	Same requirements as Transmission projects
2.2.2.7 Abandonment Costs	Same requirements as Transmission projects
2.2.2.8 Adequately Demonstrate Project Viability in a Commercially Reasonable Timeframe	Same requirements as Transmission projects
2.2.2.9 Contribution to Employment; Economic Development Benefits	Same requirements as Transmission projects
2.2.2.10 Utilizing an Appropriate Tracking System to Account and Enable for GWSA Goals	Same requirements as Transmission projects
2.2.2.11 Discussion of Safety Plan and Environmental Assessment	Same requirements as Transmission projects
2.2.2.12 Benefits to Environmental Justice Populations and Low-Income Ratepayers in the Commonwealth, and Transitioning Fossil Fuel Communities	Same requirements as Transmission projects
2.2.2.13 Diversity, Equity and Inclusion	Same requirements as Transmission projects
2.2.3 Security Requirements	Same requirements as Transmission projects
2.2.4 Unreasonable Balance Sheet Impacts	Same requirements as Transmission projects
2.2.5 Shifting of Risks in Long-Term Contracts	Distribution Projects will not be provided the opportunity to mark-up or negotiate the Long-Term Contracts

Section A-1: Certification, Project, and Pricing Data

The Certification, Project and Pricing Data (“CPPD”) document is a Microsoft Excel workbook that is provided on the website at www.MACleanEnergy.com. Each Transmission Project and Distribution Project submitted by bidder must include a unique, accompanying CPPD document.

Section A-2: Executive Summary of the Proposal

The bidder is required to provide an executive summary of the project proposal that includes a complete description of the proposed Energy Storage System bid, the proposed contract term and pricing schedule, interconnection plan, the overall project schedule and other factors the bidder deems to be important. A table summarizing proposal(s) including details such as storage project location, interconnection location(s), capacity (MW), duration (hours), projected annual average CPECs or Environmental Attributes (if applicable), energy storage technology to be deployed, commercial operation date, pricing (e.g., \$/CPEC, \$/environmental attribute, \$/MWh), etc. is encouraged. Bidders submitting multiple Transmission Projects or Distribution Projects must provide an executive summary for each project.

COMPANY OVERVIEW

A WORLD LEADER IN RENEWABLE ENERGY GENERATION

Brookfield Renewable Partners LP (NYSE: BEP) (“Brookfield” or “Brookfield Renewable”) operates one of the world’s largest publicly traded platforms for renewable power and sustainable solutions. Our renewable power portfolio consists of hydroelectric, wind, utility-scale solar, distributed solar and storage facilities and our sustainable solutions assets include our investment in a leading global nuclear services business and a portfolio of investments in carbon capture and storage capacity, agricultural renewable natural gas, materials recycling and eFuels manufacturing capacity, among others.

Brookfield Renewable is the flagship listed renewable power and transition company of Brookfield Asset Management, a leading global alternative asset manager headquartered in New York, with over \$1 trillion of assets under management. Brookfield Asset Management and its affiliates employ approximately 250,000 people involved in the day-to-day operations of facilities, business, and project development worldwide. We are a global leader in decarbonization, with integrated operating platforms on five continents with operating, development, and power marketing expertise.

Brookfield Renewable has over 120 years of experience in power generation. With its North American business headquartered in New York, N.Y., Brookfield Renewable N.A. owns and operates hydropower, wind, solar, and storage facilities across 34 states. The North American platform consists of over 190 utility-scale renewable facilities and over 5,400 distributed generation solar projects, totaling approximately 17,000 MW in nameplate capacity. Our utility-scale portfolio continues to grow with a diversified pipeline of renewable development projects totaling over 70 GW. In recent years, Brookfield has expanded its portfolio (shown in Figure 1 below) through acquisitions of several renewable platforms, including TerraForm Power, Urban Grid, Scout Clean Energy, X-Elio, Deriva Energy (formerly Duke Energy Renewables), Standard Solar, Geronimo Power, Boralex, and Aypa.

Further information about Brookfield is available at <https://www.brookfield.com/about-us/capabilities/energy>.

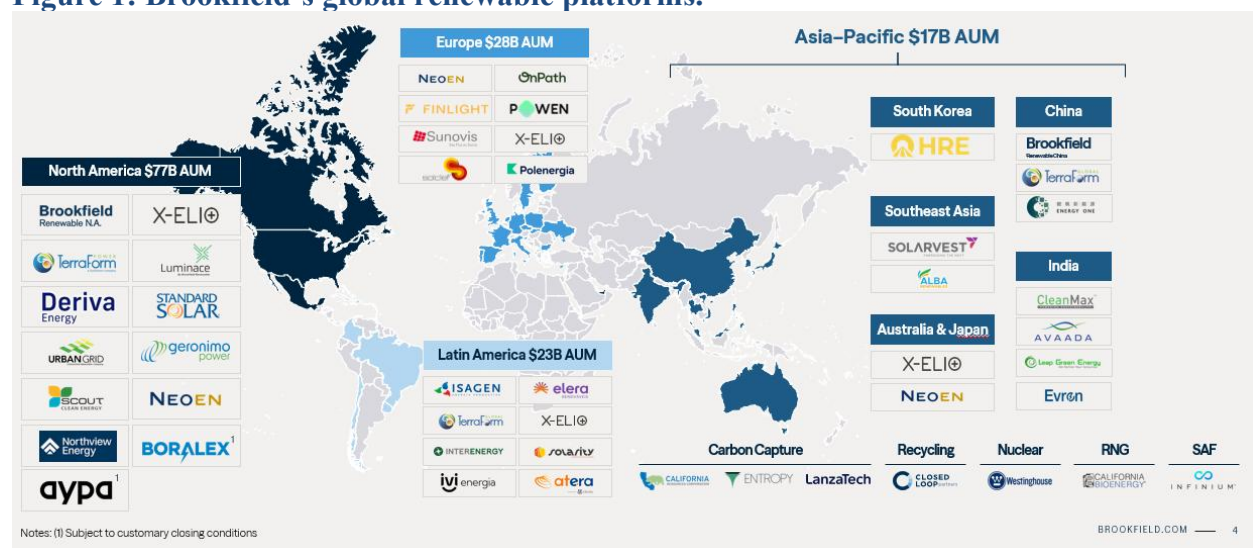
PRIOR EXPERIENCE AND QUALIFICATIONS

Brookfield Renewable has significant experience operating and developing power generation projects. Brookfield Renewable's operations are founded on decades of experience that allow it to optimize its extensive portfolio of hydroelectric, wind, solar, storage, and distributed energy resources.

Brookfield Renewable delivers projects from conception through development, including financing, construction, and operation, leveraging in-house technical expertise. Brookfield oversees planning and construction across the entire portfolio to ensure projects meet best-in-class quality standards at competitive costs.

One of the strategic advantages Brookfield Renewable offers is a proven ability to manage large capital projects, with experience working with local agencies, communities, and regulators to optimize development. Through the strategic deployment of advanced digital technology management systems and proactive, on-site maintenance by site managers, Brookfield has consistently enhanced energy yield and operational efficiency across its renewable energy platform.

Figure 1: Brookfield's global renewable platforms.



PROPOSAL SUMMARY

Bear Swamp Power Company LLC has submitted this bid reflecting 100% of the CPECs generated from the Bear Swamp Pumped Hydro facility (Bear Swamp), located in Florida and Rowe, Massachusetts. Commercial details of the bid include:

Term	
Price	
CPS Bid Capacity	
Estimated Annual CPECs	

Facility Overview, Bid Capacity and CPPD Form Details

Bear Swamp is a 666MW pumped storage facility with a generation (discharge) duration of up to 4.5 hours at full capacity. The installed capacity includes upgrades completed in 2021 (at Unit 2) and 2023 (at Unit 1), respectively, that resulted in a portion of hourly facility output being eligible to generate Clean Peak Energy Certificates (CPECs) under the Clean Peak Energy Portfolio Standard (CPS). As a fully operational facility with an active interconnection agreement in place the project provides a low-risk contracting opportunity for delivery of CPECs at a fixed price, .

As listed in the CPS Qualified Facilities list, Bear Swamp (J. Cockwell) is eligible to generate, and is generating, Clean Peak Energy Certificates (CPECs) based on approximately 87.759MW of incremental capacity realized from upgrades completed after January 1, 2019.¹ This bid is for the full CPEC-generating capacity of the Bear Swamp facility.

Because Bear Swamp was operational before the upgrades added new capacity and because establishing metering specific to the incremental capacity alone would not be feasible, the DOER determined that Bear Swamp generates CPECs based upon a set percentage of the total output from each of its two units in each applicable hour: 14% for Unit 1 and 17% for Unit 2. Accordingly, this is how the CPECs generated by the Bear Swamp facility are calculated. The minting of CPECs for Bear Swamp is administered by an approved third-party DAS provider.

Given this unique situation specific to how the DOER accounts for Bear Swamp's incremental capacity participating in the CPS, Bear Swamp has included information throughout this submittal, including in the CPPD form, that reflects full facility capacity, pumping load and generation, and has established estimated CPECs based on the applicable percentages of overall facility output. This approach is necessary to be consistent with how DOER determined the CPECs from the incremental new capacity at Bear Swamp are calculated. Presenting information and data based solely on the eligible MWs as listed in the CPS Qualified Facilities list would not be feasible or representative of how Bear Swamp generates CPECs. Bear Swamp is happy to provide clarification or supporting documentation for any questions the RFP Team may have.

Section A-3: Operational Parameters and Operational Schedule

Please answer the following questions in Section A-3 for each Transmission Project and Distribution Project being bid. If developing the project in phases, please break out information for each phase.

3.1 Energy Storage System Operations Project Summary – Please provide the following:

- i. Identify if New or Existing Facility, or an upgrade to Existing Facility:
Upgrade to Existing Facility
- ii. Technology Type (e.g., mechanical, chemical, thermal): *Mechanical*
- iii. Technology Description (e.g., battery chemistry, thermal storage medium):
Pumped Hydropower
- iv. Point of Interconnection Deliverability Restrictions (if any): *None*
- v. Nameplate MW AC (at 100% project completion): *666MW (87.759MW listed in CPS Qualified Facilities list – See Section A-2)*
- vi. Net Contract MW AC (at 100% project completion): [REDACTED]
- vii. Charge rate (MW): [REDACTED]
- viii. Discharge rate (MW): [REDACTED]
- ix. Storage Energy (MWh): *2,977MWh*
- x. Discharge Duration at Full-Rated Capacity (hours): *4.5 hours*
- xi. Charging Efficiency (%): [REDACTED]
- xii. Discharging Efficiency (%): [REDACTED]
- xiii. Round Trip Efficiency (%): [REDACTED]
- xiv. Other Characteristics of your system, including, if applicable, but not limited to: Depth of Discharge (%), Full Duty Cycle, etc.: *N/A*
- xv. Max/ Min cycles per year, season, and per day: *2 cycles maximum per day, 1 cycle minimum per day*

3.2 Describe the operation of the proposed Energy Storage System: (i.e. run hour limitations, ramp rates, spinning reserves, regulation up, regulation down). Please provide proposed operational management terms that memorialize the operational commitments of the facility.

Bear Swamp is a 666MW pumped storage hydropower facility made up of two generators with 330MW Eco Max capability. Each of those two generators is CLAIM10 capable of up to 330MW, which means that in 10 minutes the whole station can ramp up to full output, and often does. The Eco Min of each unit is 220MW, so the regulation range (reg up and reg down) or spinning reserves that can be provided are 110MW per unit. When its reservoir is full, the combined station can produce approximately 2997MWh (666MW x 4.5 hours). The

minimum run time for pumping and generation is 1 hour to limit equipment wear.

Bear Swamp anticipates operating each day at its full output. This type of operation has been the historical performance in the ISO-NE's wholesale market on a daily basis.

3.3 Describe the location of the Energy Storage System, in terms of:

i. The anticipated interconnection point

Bear Swamp is located in northwestern Massachusetts (Florida and Rowe). As outlined in the Interconnection Agreement (located in Folder 6.7 Confidential), the Point of Interconnection for Unit 1 is at the Interconnecting Transmission Owner's (New England Power Company/National Grid) 230 kV bus at Bear Swamp 230/115 kV switchyard on the Interconnecting Transmission Owner's side of the 1T-230A switch. The Point of Interconnection for Unit 2 is at the Interconnecting Transmission Owner's 230 kV bus at Bear Swamp 230/115 kV switchyard on the Interconnecting Transmission Owner's side of the 2T-230A switch.

ii. The value of the relative proximity of the system to large loads and/or any clean energy generation facility, including any decreased risk of curtailment and/or deferred investment for the generation facility

Per the ISO-NE queue report in Folder 3.3, Bear Swamp is located within relative proximity to several operating wind and solar projects and provides dispatch flexibility to complement the production of these sites.

iii. How the location of the Energy Storage System may impact the operation of fossil-fuel based generators (e.g. reduced ramping, peaker displacement, etc.)

By providing fast response storage and peak balancing capacity, Bear Swamp reduces the need for oil- and gas-fired peaking plants located in Massachusetts. In this way, Bear Swamp indirectly benefits fossil fuel communities by mitigating reliance on fossil-fired resources, enhancing grid reliability and supporting renewables integration that reduces future demand for fossil resources.

iv. If the project location is in proximity to other Energy Storage Systems

Bear Swamp is located in relative proximity to the Northfield Mountain Pumped Hydro facility, as shown in the ISO-NE queue report in Folder 3.3.

v. How the location was strategically located to maximize grid benefits and align with transmission and distribution planning priorities, such as deferring or eliminating the need for costly transmission and distribution upgrades

Bear Swamp is an existing facility that was strategically located in a robust area of the system to address any large contingencies.

3.4 Describe the proposed technology and equipment manufacturer by name and model

(include inverter characteristics if applicable).

Bear Swamp is a 666 MW pumped storage hydropower facility that has been in continuous operation since 1974. The plant consists of two vertical-shaft, single-runner, reversible Francis pump-turbines with adjustable wicket gates, manufactured by Hitachi and later upgraded by American Hydro in 2021/2022. Upgrades included new stainless steel runners and wicket gates, improved hydraulic design, and refurbishment of major components to enhance performance and reliability.

Each unit is paired with a Toshiba vertical-shaft synchronous motor-generator, rewound and uprated to 366 MVA by Andritz in 2016/2017. The powerhouse is equipped with a 606-ton Whiting bridge crane, spherical inlet valves, modernized Woodward digital governors, and redundant mechanical balance-of-plant systems for cooling, sealing, drainage, and fire protection.

This proven, large-scale hydropower technology has operated reliably for over five decades, and with proper maintenance and capital reinvestment, facilities of this type can operate indefinitely.

3.5 Describe the viability and operational reliability of the proposed technology and track record of the manufacturer. Provide examples of similar applications of the same size and scope and evidence of meeting operational delivery plans in other energy storage projects.

Bear Swamp is a 666 MW pumped storage hydropower facility commissioned in 1974 and has operated reliably for over 50 years. The plant has consistently met operational availability targets, supporting both peak energy delivery and grid reliability for ISO-NE. The core generating equipment—supplied by Hitachi (turbines) and Westinghouse (generators)—has a proven track record in large-scale pumped storage applications worldwide. With proper maintenance and targeted capital investments, pumped storage assets can operate into perpetuity. Similar pumped storage facilities of comparable scale and design operate successfully throughout the United States. For evidence regarding deployment of other energy storage projects see Section 5.6.

3.6 Please provide an Environmental Attribute delivery plan and a charge/discharge profile for the proposed project, including supporting documentation. This documentation may be either an hourly storage use schedule or planned charge and discharge schedule. In your plan, please account for forecasted weather data and market assumptions over the life of the proposed contract. The energy production/delivery profile must provide the expected Generation to be delivered into the ISO-NE market settlement system by the Energy Storage System to allow the Evaluation Team to determine the reasonableness of your projections. Such information should be consistent with the charge/discharge profile provided above and also considering any and all constraints to physical delivery into ISO-NE. Describe the operation of the Energy Storage System, including whether the proposed Energy Storage System will be classified as a Binary Storage Facility or Continuous Storage Facility, the designation of the ISO-NE Markets that the Energy Storage System would participate in, and

the plan to operate in multiple ISO-NE Markets.

The primary operational strategy of Bear Swamp will be to generate up to its maximum capability of 4+ hours of output at up to full capacity during the CPS hours. This type of generation pattern has been the norm over the last several years and we anticipate a similar approach moving forward.

Hourly storage schedule is outlined in CPPD form Part V, which is anticipated to remain generally consistent throughout the term of the contract, subject to future potential changes in Seasonal Peak Periods (generation/discharge) and high renewable hours (pump/charge).

In terms of the charging/pumping and discharging/generation pattern for Bear Swamp, the strategy is to pump in the morning high renewable hours so water is available to generate during the evening Clean Peak hours by season. This pattern is expected to remain consistent throughout the year, with April and October being limited exceptions due to planned outage periods. For market dispatch, Bear Swamp's energy arbitrage is scheduled based on the economics of pump cost, round trip efficiency, and CPEC generation. We have operated under this approach since the inception of the Clean Peak program and anticipate this to remain the same going forward.

This makes Bear Swamp more economic during the Clean Peak Windows, as reflected in our generation profile in the CPPD form.

CPECs will be delivered quarterly in the trading period in which they are issued.

The asset will be operated as a Binary Storage Facility.

3.7 Please describe how, as a Qualified Energy Storage System as defined in 225 CMR 21.00 Clean Peak Energy Standard (CPS), the storage system will meet the CPS requirements to operate primarily to store and discharge renewable energy. Specifically, please describe any co-location or contractual pairing with an RPS qualified resource, describe/include plans for charging coincident with periods of typically high renewable energy production, or include an operational schedule in the Qualified Energy Storage System's Interconnection Service Agreement demonstrating that the Qualified Energy Storage System serves to resolve load flow or power quality concerns otherwise associated with intermittent renewable energy resources.

Bear Swamp Pumped Storage Facility (Jack Cockwell) is a 666MW pumped storage facility located in Florida and Rowe. The energy storage facility includes a reservoir for storage and two units for generation (full capacity for up to 4.5 hours in duration). Unit 2 underwent a capacity upgrade that was completed in 2021 and subsequently resulted in CPS eligibility for 47.759MW of the Unit's capacity (GIS ID CPS1042). Unit 1 separately underwent a capacity upgrade that was completed in 2023 and subsequently resulted in CPS eligibility for

40MW of the Unit's capacity (GIS ID CPS1282) – in each case, eligibility was based upon “incremental new capacity at an existing energy storage system on or after January 1, 2019 that has received a Statement of Qualification from the Department.” In order to generate CPECs, Bear Swamp is optimized to charge during the CPS defined Clean Peak Season charging hours (typically high wind hours) and dispatched to generate during defined Seasonal Peak Periods. Unit 2 CPEC generation is determined based upon 17% of Unit output and Unit 1 CPEC generation is determined based upon 14% of Unit output (each as approved by DOER and PTS). Unit 1 and Unit 2 have participated in the CPS program for several years and internal operations and commercial staff have significant experience in effective program participation.

3.8 Please list and describe all anticipated revenue streams associated with the Energy Storage System, including, but not limited to, the designation of the ISO-NE Markets that the Energy Storage System would participate in, the plan to operate in multiple ISO-NE Markets, and revenue streams from other third-party contracts/arrangements. For existing facilities, describe existing operations, revenues, and participation in ISO-NE Markets and describe any planned changes in operation, participation in ISO-NE Markets, and revenue streams.

Bear Swamp currently participates in ISO-NE Energy, Capacity and Ancillary Services markets. Bear Swamp is offered in the energy market to ensure charging and discharging is consistent with Seasonal Peak and Monthly Peak windows. Currently, the generation of CPECs is assumed in how Bear Swamp is offered in the ISO market. At times the LMP prices alone do not always provide adequate economic incentive for the generator to be dispatched during the CPEC hours, (i.e., absent the CPEC revenue, would result in uneconomic dispatch or no dispatch at all). As such, these CPEC revenues alter the resource's behavior in favor of delivering clean energy during DOER-defined peak periods. This same approach is anticipated if a contract is obtained as a result of this RFP. [REDACTED]

3.9 Maintenance Outage Requirements – Specify partial and complete planned outage requirements in weeks or days for all generation facilities and associated facilities required for the delivery of energy from the generation facilities to the delivery point. Also, list the number of months required for the cycle to repeat (e.g., list time interval of minor and major overhauls, and the duration of overhauls).

The attached outage schedule below outlines planned maintenance and capital improvement activities for the next five years as part of Bear Swamp's normal preventative and predictive maintenance cycle, including for the separate Fife Brook hydro facility included under the same FERC license. These scheduled outages support routine inspections, equipment overhauls, and targeted capital upgrades—ensuring safe, reliable, and efficient operation of the facility while minimizing impacts to availability. All activities are aligned with OEM recommendations and regulatory requirements.

Note that this schedule, also found in Folder 3.9 Confidential, represents a typical five-year

plan but is subject to change as operational needs evolve.

2027				
Unit	Start	End	days	Explanation
2028				
Unit	Start	End	days	Explanation
2029				
Unit	Start	End	days	Explanation
2030				
Unit	Start	End	days	Explanation
2031				
Unit	Start	End	days	Explanation

3.10 Operating Constraints – Specify all the expected operating constraints and operational restrictions for the project (e.g., limits on the number of hours a unit may be operated per year or unit of time or charge / discharge cycles per year).

The project's upper reservoir contains 2997MWh of energy which is used for daily cycling, depending on market conditions. It also maintains a minimum run time of 1 hour in the market (both pumping and generation) to prevent equipment wear from unnecessarily frequent starts / shutdowns and to follow price signals that would otherwise change more frequently. At maximum generation of 333 MW per unit, the station can therefore run 9 unit-hours per day (4.5hours at 666MW) unless additional daytime pump cycle(s) are performed to recharge the upper reservoir.

3.11 Degradation mitigation plan – If applicable to the proposal’s technology type, specify the anticipated degradation rate (absent any mitigation) and plan for mitigation of

output degradation (e.g., augmentation schedules or over build plans).

Bear Swamp is a pumped storage hydropower facility that has been in continuous operation since the 1970s. Unlike electrochemical battery systems, its generation capability does not degrade significantly over time. With proper maintenance and in the absence of major equipment failure, output remains stable for decades. This stability is reinforced through a robust degradation mitigation strategy embedded in our preventative and predictive maintenance programs—including turbine-generator overhauls, transformer inspections, wicket gate and runner refurbishment, and control system upgrades. Notably, the upgraded turbines are overbuilt relative to the interconnection limit, meaning that even with minor degradation, the facility can reliably deliver its full 666MW capacity to the market throughout the contract term.

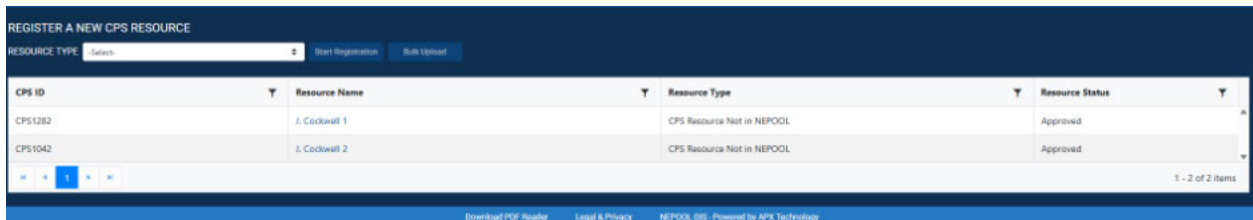
Section A-4: Environmental Attribute Delivery Plan

4.1 For each Transmission Project and Distribution Project being bid, please provide documentation and information demonstrating that the project will deliver into the Distribution Companies' NEPOOL GIS accounts, GIS Certificates representing CPECs and any other Environmental Attributes, as applicable associated with the energy storage project. Please describe whether transfer of all GIS Certificates is authorized under the current ISO-NE GIS rules and protocols, or if a rule or protocol change is required. To the extent such change is required, please provide details regarding the proposal and the process for implementing the change.

Bear Swamp is a CPS resource (under the name J. Cockwell) registered and approved in NEPOOL GIS in 2021 and is currently managed in Brookfield Renewable Trading and Marketing LP's NEPOOL GIS Account. Bear Swamp is being issued CPECs on quarterly basis and has successfully delivered CPEC certificates to EDCs NEPOOL GIS account before.

Current and future transfer of Bear Swamp GIS certificate (including CPECs) is authorized under ISO-NE GIS rules and protocols, and no change is required.

1. Screenshot of approved Bear Swamp CPS resources:



The screenshot shows a web interface titled "REGISTER A NEW CPS RESOURCE". It includes a "RESOURCE TYPE" dropdown menu, a "Start Registration" button, and a "Bulk Upload" button. Below this is a table with the following columns: CPS ID, Resource Name, Resource Type, and Resource Status. The table contains two rows of data, both with a status of "Approved".

CPS ID	Resource Name	Resource Type	Resource Status
CPS1282	J. Cockwell 1	CPS Resource Not in NEPOOL	Approved
CPS1042	J. Cockwell 2	CPS Resource Not in NEPOOL	Approved

At the bottom of the table, there is a pagination control showing "1 - 2 of 2 items".

2. NEPOOL GIS account of Brookfield Renewable Trading and Marketing LP:



The screenshot shows a web interface titled "ACCOUNT INFORMATION". It displays the following account details:

Company ID:	18161
Company Name:	Brookfield Renewable Trading A
Account Administrator Email:	certificates@brookfieldrenewable.com
Account Administrator Phone:	819-561-2722

Section A-5: Financial and Legal

For all project-specific questions in Section A-5, if bidding in multiple Transmission Projects or Distribution Projects, please answer each question for each Transmission Project or Distribution Project being bid.

5.1 Except for existing Energy Storage Systems, which do not need to demonstrate that a long-term contract under Section 83E is necessary to facilitate financing, please submit information and documentation that demonstrates that long-term contracts resulting from this RFP Process would either permit the bidder to finance, or refinance, its proposal that would otherwise not be financeable or assist the bidder in obtaining financing of its proposal.

N/A

5.2 Please provide a description of the business entity structure of the bidder's organization from a financial and legal perspective, including all general and limited partners, officers, directors, managers, members and shareholders, involvement of any subsidiaries supporting the project, and the providers of equity and debt during project development. Provide an organization chart showing the relationship between the equity and debt participants and an explanation of the relationships. For jointly owned facilities, identify all owners and their respective interests, and document the Bidder's right to submit a binding proposal.

Bear Swamp Holding Company LLC (a Brookfield entity) holds a 50% interest in the Bidder. The remaining 50% is held by Emera Bear Swamp Holdings LLC ("Holdings"), a wholly owned indirect subsidiary of Emera Incorporated ("Emera"). Holdings and Emera jointly manages the Bidder via a joint ownership committee which meets on a quarterly basis pursuant to a certain limited liability company, as amended from time to time. As such, the Bidder is a joint venture which operates two hydropower plants in the project (No. 2669), 666-MW Bear Swamp pumped-storage and 11-MW Fife Brook, on the Deerfield River (the "Portfolio") through its Manager (Brookfield Power New England LLC, an affiliate of Holdings and the Bidder) under a Management, Operations & Maintenance Agreement.

See Folder 5.2 Confidential for an organizational chart showing the relationship between the equity and debt participants. The Bidder is permitted to submit a binding proposal pursuant to its organizational documents, including, but not limited to, the LLC Agreement and the MOMA.

5.3 Please provide a description of the financing plan for the project, including construction and term financing. The financing plan should address the following:

- i. Who will finance the project (or are being considered to finance the project) and the related financing mechanism or mechanisms that will be used (i.e. convertible debenture, equity or other) including repayment schedules and conversion features

The project is currently operating and financed via a private placement bond loan with a group of institutional investors. The debt has a maturity date of October 8, 2035 and is structured as interest-only and priced at a fixed rate. The capital structure would have the opportunity to be optimized following contract award given the high quality and long-term nature of the contracted cash flows.

- ii. The project's existing initial financial structure and projected financial structure

The project is fully financed. The capital structure and leverage will however have the opportunity to be optimized by reducing both Sponsor and Lender risk following contract award given the contracted nature of the cash flows, which would help further support ongoing capital investment.

- iii. Expected sources of debt and equity financing

The project is currently operating and uses project generated cash flows to fund capital investment. See above for financing structure.

- iv. Estimated construction and other costs to develop and operate the project

There are no expected construction costs given the operating nature of the project; however, ongoing capital investment is required to maintain the asset at its current condition. Ongoing capital investment is funded with project cash flows earned by selling energy, capacity and CPECs.

- v. The projected capital structure

The project is financed with long-term debt, which will have the opportunity to be optimized following contract award given the long-term contracted nature of cash flows.

- vi. Describe any agreements, both pre and post commercial operation date, entered into with respect to equity ownership in the proposed project and any other financing arrangement.

The project is owned through a 50/50 joint venture partnership between Brookfield Renewable Partners and Emera Inc., which is governed by a LLC Agreement.

- vii. In addition, the financing plan should address the status of the above activities as well as the financing of development and permitting costs. All bidders are required to provide this information.

All development and permitting costs were funded when the project was constructed, in advance of initial COD in 1974. Ongoing regulatory and capital investment costs are funded via project cash flows earned from the sale of energy and capacity products into ISO-NE, including major unit upgrade costs incurred from 2021-2023 to increase the overall capacity of the Project.

5.4 Please describe any financial commitments to enter into long-term contracts with businesses, nonprofit organizations, a municipality or group of municipalities, or other

sources of long-term revenue.

[REDACTED]

5.5 Please describe the status of the commitments with any offtakers, including any executed agreements, provided that such agreements may be contingent on the project being selected for contracting under this RFP.

[REDACTED]

5.6 Provide documentation illustrating the experience of the bidder in securing financing for projects of similar size and technology. For each project previously financed provide the following information:

- i. Project name and location
- ii. Project type and size
- iii. Date of construction and permanent financing
- iv. Form of debt and equity financing
- v. Current status of the project

Smoky Mountain Hydro, North Carolina & Tennessee – 378MW operating portfolio of 4 hydroelectric facilities. Constructed in the early 1900's [REDACTED]

[REDACTED]

Lucky Bluff & Black Springs, Texas – Stand-alone BESS: Lucky Bluff: 100MW /200MWh / Black Springs: 120MW /240MWh. [REDACTED]

[REDACTED]

Pitt Solar, North Carolina – Utility scale solar. 123MWdc / 80MWac. Currently under construction with COD expected December 2026. [REDACTED]

[REDACTED]

5.7 Please provide evidence that the bidder has the financial resources and financial strength to complete and operate the project as planned, including contingencies for project delays or

cost overruns.

The Bear Swamp capacity upgrades for Unit 1 and Unit 2 are completed and the facility is fully operational. Bear Swamp realizes varied revenue sources, including energy spread revenue, capacity revenue and ancillary revenues. The project is capable of funding ongoing operational and capital expenditure costs using operating revenue, and benefits from the support of two JV sponsors which are able to contribute equity in the event the project experiences incremental cost obligations.

5.8 Please provide details of any financial difficulties by the bidder or any of its past or present affiliates which impaired the viability and/or financing of the development and construction of projects of similar type, size, and complexity of the proposed eligible project or other large scale renewable energy project, including any past terminated projects and claims of financial difficulties. Bidders must demonstrate how the proposed eligible project materially differs from any past projects and demonstrate fully the financial viability of the project as bid.

There are no instances of financial difficulties for Bear Swamp. In addition, Brookfield Renewable benefits from flexible financing terms including the absence of financial covenants and the ability to contribute equity into projects to ensure debt service is always met in the event of extreme unforeseen circumstances.

5.9 Describe the assumptions applied by Bidder regarding forecast changes in project costs during the contract term, interest rates over the development period, key input commodity prices, and the methodology used to establish the project contingency amount. Additionally, describe the assumptions made regarding forecasted revenue from other sources (including but not limited to energy arbitrage, capacity and ancillary services markets, or other contractual arrangements) as well as the measure of discount applied to the value of these other revenue streams. Bidder must explain why these assumptions are reasonable and describe and quantify how the project as proposed is designed to absorb sufficient risk to ensure the project can be successfully financed at the proposed price.

Given the operating nature of the Bear Swamp Pumped Storage facility, revenue sources are well known and understood. Financing is completed on a long-term fixed rate basis, removing all risk associated with interest rate volatility. Financings and internal projections are based on realized revenues related to energy spreads (energy generation less energy pumping costs), capacity sales, and other ancillary and CPEC/REC sales, as well as third party consultant forecasts. Ongoing operational and capital investment costs are diligently managed and planned in order to ensure adequate cash flow is available to meet the projects needs.

5.10 Provide complete copies of the most recent audited financial statement and annual report for each bidder for each of the past three years; including affiliates of the bidder (if audited statements are not available, reviewed or compiled statements are to be provided). Also, provide the credit ratings from Standard & Poor's and Moody's (the senior unsecured long term debt rating or if not available, the corporate rating) of the bidder and any affiliates

and partners.

Copies of audited financials from the most recent three years are included in Folder 5.10 Confidential. Bear Swamp Power Company LLC is not rated; however, Brookfield Renewable Partners LP (BEP) maintains investment-grade credit ratings of BBB+ from S&P and Fitch.

5.11 Please also include a list of the board of directors, officers and trustees for the past three years and any persons who the bidder knows will become officers, board members or trustees.

See Folder 5.11 Confidential for appointments from September 2, 2023 to current.

5.12 The bidder should demonstrate its ability (and/or the ability of its credit support provider) to provide the required security, including its plan for doing so.

Brookfield Renewable Partners LP (BEP) will provide liquidity on behalf of the bidder Bear Swamp Power Company LLC for the benefit of all applicable beneficiaries. As of August 2026, BEP has corporate liquidity of \$4.6 billion, supporting its substantial capacity to post credit support.

5.13 Provide a description of any current or recent credit issues/ credit rating downgrade events regarding the bidder or affiliate entities raised by rating agencies, banks, or accounting firms.

None.

5.14 Describe the role of the Federal Investment Tax Credit (“ITC”), and any other incentives or awards, on the financing of the project. In your response, please describe (a) your plan to qualify for the ITC and the level of the ITC for which you plan to qualify, (b) the facilities, investment in which, the ITC is expected to apply, (c) your plan to utilize the tax credits and the relationship to your financing plan, and (d) how qualification for the ITC is reflected in your proposed pricing. Please also describe qualification plans, applicability and utilization of any other Federal incentives or awards.

Bidders must clearly state their assumptions regarding the availability of federal or state tax credits, subsidies, or grants or other incentives, including but not limited to those available under the Inflation Reduction Act of 2022 (IRA), the Infrastructure Investment and Jobs Act of 2022, and the One Big Beautiful Bill Act (the “OBBBA”).

Bidders should describe any plans to meet federal domestic content and labor requirements in order to maximize federal tax credits available to the project under the IRA and the OBBBA . Bidders must also describe plans to pursue state funding available to energy storage projects.

As part of the provisions of the OBBBA, the Bidder must describe the credibility and status of compliance with “foreign entities of concern” (FEOC) and provide compliance documentation (e.g. preparation of non-FEOC reports, certifications, or existing safe harbor provisions). In addition to describing how bidder will qualify and demonstrate initial

compliance with FEOC, bidder must also provide a description of bidder's plan to remain compliant throughout the life of the project, including but not limited to retaining effective control of the project throughout its lifecycle, to avoid any recapture of ITC.

Bear Swamp was able to receive the regulatory approvals from FERC and then apply for ITC credits. [REDACTED]

[REDACTED] *These ITCs were claimed for Unit 1 in the tax year that ended on December 31, 2023 and for Unit 2 in the tax year that ended on December 31, 2021. No domestic content or labor requirements are applicable to the facility on a going-forward basis.*

5.15 Bidders must disclose any litigation or disputes in the last three-year period related to projects developed, owned or managed by bidder or any of its affiliates in the United States, or related to any energy product sale agreement.

[REDACTED]

[REDACTED]

5.16 What is the expected operating life of the proposed project? What is the depreciation period for all substantial physical aspects of the bid, including generation facilities, delivery facilities to move power to the grid, and mandatory and voluntary transmission or distribution system upgrades?

Through the appropriate maintenance and operations Bear Swamp can be operated as a perpetual asset, with key facility components often capable of supporting 30-50 years of operations without replacement. Remaining depreciation period for all substantial physical assets are currently between 30-40 years.

5.17 Has the bidder already obtained financing, or a commitment of financing, for the project? If financing has not been obtained, explain how obtaining a long-term agreement as proposed will help you in obtaining financing for the proposed project, in obtaining more favorable terms for the financing of the proposed project, or in supporting the future capital investment.

The project is operational and as such financing is in place through 2035 with a group of

institutional investors at a fixed interest rate.

5.18 State whether the bidder or its affiliates have executed agreements with respect to energy, CPECs and/or capacity for the proposed project (including any agreements that have been terminated) and provide information regarding the associated term and quantities, and whether bidder has been alleged to have defaulted under or breached any such agreement. State whether the bidder or its affiliates have submitted proposals to other buyers, the status of consideration of such proposals, and the impact of such proposal(s), if they result in an executed contract or contracts, on the proposal(s) submitted in response to this RFP.

[REDACTED]

[REDACTED]

5.19 List all of the Bidder's affiliated entities and joint ventures transacting business in the energy sector.

See Folder 5.19 Confidential for Brookfield and Emera affiliate lists.

5.20 Has Bidder, or any affiliate of Bidder, in the last five years, (a) consented to the appointment of, or been taken in possession by, a receiver, trustee, custodian or liquidator of a substantial part of its assets, (b) filed a bankruptcy petition in any bankruptcy court proceeding, (c) answered, consented or sought relief under any bankruptcy or similar law or failed to obtain a dismissal of an involuntary petition, (d) admitted in writing of its inability to pay its debts when due, (e) made a general assignment for the benefit of creditors, (f) been the subject of an involuntary proceeding seeking to adjudicate that Party bankrupt or insolvent, (g) sought reorganization, arrangement, adjustment, or composition of it or its debt under any law relating to bankruptcy, insolvency or reorganization or relief of debtors?

Bear Swamp Power Company LLC and its affiliates have not filed for bankruptcy in the last five years.

5.21 Briefly describe any known conflicts of interest between bidder or an affiliate of bidder and any Distribution Company, or any affiliates of the foregoing.

None.

5.22 Describe any litigation, disputes, claims, complaints or notices of violation or potential violation involving the project or other energy storage projects involving the bidder

or an affiliate of the bidder.

See answer in Section 5.15.

5.23 Describe any failures by the bidder and/or its affiliates to achieve commercial operation dates under other long-term contracts. Bidders should also provide a credible description of how the current proposed project will avoid similar project delays or development issues.

N/A

5.24 Describe any litigation, disputes, claims or complaints involving the bidder or an affiliate of bidder, against any Distribution Company or any affiliate of any Distribution Company.

N/A

5.25 Describe any litigation, disputes, claims or complaints, or events of default or other failure to satisfy contract obligations, or failure to deliver products, involving bidder or an affiliate of bidder, and relating to the purchase or sale of energy, capacity or environmental attributes or products.

We are not aware of any supply or delivery failures that were not rectified in accordance with applicable contractual provisions or, in the case of capacity supply obligations, within market cure periods. As such, neither bidder nor its affiliates have, to our knowledge, triggered any contractual events of default under its energy, capacity or environmental attribute purchase or sale agreements.

5.25 Confirm that neither bidder nor any directors, employees or agents of bidder, nor any affiliate of bidder are currently under investigation by any governmental agency, and that none of the above have in the last four years been convicted or found liable for any act prohibited by State or Federal law in any jurisdiction involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or have been the subject of any debarment action (detail any exceptions).

Bear Swamp is a joint venture between Brookfield and Emera. Each entity is part of a large corporate structure and, consequently, each of its directors, employees and agents, as well as its respective affiliates, have been involved in regulatory investigations by governmental authorities from time to time. Any such regulatory investigations would not have a material effect on Bear Swamp's ability to perform on the contracts related to this RFP. In addition, Bear Swamp, or any of its directors, employees, agents, and affiliates, has not in the last four years been convicted or found liable for any act prohibited by State or Federal law in any jurisdiction, in each case involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or has been the subject of any debarment action.

5.26 Identify all regulatory and other approvals needed by bidder to execute a binding

sale agreement.

No regulatory approval is required.

5.27 Describe how the project will conform to FERC's applicable regulatory requirements, including, but not limited to, FERC requirements relating to allocation of transmission capacity and open access, the justness and reasonableness of rates, the potential for undue preference or discrimination, and affiliate dealings, if any. Describe how your proposed approach is consistent with FERC precedent and ratemaking principles.

Bear Swamp Power Company LLC coordinates with outside FERC counsel to track its FERC compliance obligations with respect to Bear Swamp's market-based rate authorization and exempt wholesale generator status and to make appropriate filings on an as-needed basis. Bear Swamp and its applicable affiliates submit EQR and FERC 860 filings in accordance with regulatory deadlines.

5.28 Describe and document any and all direct and indirect affiliations and affiliate relationships, contractual, financial or otherwise in the past three years between the bidder and one or more of the Distribution Companies and their affiliates, including all relationships in which one of the Distribution Companies or their affiliates has a financial or voting interest (direct or indirect) in the bidder or the bidder's proposed project. These relationships include:

- i. Corporate or other joint arrangements, joint ventures, joint operations whether control exists or not;
- ii. Minority ownership (50% or less investee);
- iii. Joint development agreements;
- iv. Project agreements;
- v. Operating segments that are consolidated as part of the financial reporting process;
- vi. Related parties with common ownership;
- vii. Credit, debenture, and financing arrangements, whether a convertible equity feature is present or not;
- viii. Wholly owned subsidiaries; and
- ix. Commercial (including real property) relationships with any Distribution Company

None.

Section A-6: Interconnection, Deliverability, and Reliability

Please answer the following questions in Section A-6 for each Transmission Project and Distribution Project being bid:

6.1 Please provide documentation to show evidence of the interconnection request or application to ISO-NE or the applicable Distribution Company. For Transmission Projects, provide evidence of a commitment to interconnect to the ISO-NE PTF at a level equivalent to the Capacity Capability Interconnection Standard, or alternatively at the Network Resource Interconnection Standard under a Surplus Interconnection Service arrangement where the Original Interconnection Customer receives Capacity Network Resource Interconnection Service. For Distribution Projects, provide documentation describing the steps the project will take to screen for and, if applicable, establish equivalent Capacity Network Resource Capability (eCNRC) Please describe the status of any planned interconnection to the grid.

Bear Swamp has an active Large Generator Interconnection Agreement with ISO-NE and National Grid, effective January 5, 2023. The LGIA has a twenty-year term and is automatically renewed for each successive one-year period thereafter. Folder

6.7 Confidential includes the interconnection agreement which reflects the upgraded capabilities of the Bear Swamp station with NR Capability of 331.5MW and CNRC Capability of 331.5MW per each generating unit.

6.2 Provide studies that describe the Project's electrical system performance, its impact to the reliability of the New England Transmission system, how the project would satisfy ISO NE's I.3.9 requirements, and how the project, for Transmission Projects, will interconnect at an equivalent to the Capacity Capability Interconnection Standard or, for Distribution Projects, establish eCNRC. Projects that do not have I.3.9 approval from ISO-NE must include technical reports or system impact studies that approximate the ISO-NE interconnection process, including but not limited to clear documentation of study technical and cost assumptions, reasoning, and justification of such assumptions. All projects must also provide analysis that approximates the ISO-NE CCIS interconnection analysis as defined in the applicable ISO-NE Planning Procedure(s). Please also provide the status and expected completion date of any additional interconnection studies already underway with ISO-NE and/or the transmission owner. All studies must follow the current ISO-NE interconnection procedures and detail any assumptions regarding resources ahead of the Project in the ISO-NE interconnection process as defined in the ISO-NE tariff and/or Planning Procedure(s). All network upgrades identified in these studies must be clearly documented and included in the bid price. Provide a copy of an interconnection agreement, if any, executed by the bidder with respect to the proposed project. If an interconnection agreement has not been executed, please provide the steps that need to be completed before an interconnection agreement can be executed and the associated timeline.

- i. Copy of completed I.3.9 approval or I.3.9-equivalent study attached: ☐ If none,

please explain:

Copy can be found in Folder 6.8 Confidential.

- ii. Copy of completed CCIS-equivalent study attached: ☐ If none, please explain:

Copy can be found in Folder 6.8 Confidential.

- iii. Copy of Interconnection Agreement attached: ☐ If none, please explain:

Copy can be found in Folder 6.7 Confidential.

- iv. Additionally, any other studies undertaken by ISO-NE, the Distribution Company(s), or the bidder must be provided

6.3 If multiple Transmission Project interconnection requests or Distribution Project interconnection applications have been made, please specify all such active requests which have not been superseded by subsequent requests and information regarding the status of each. Provide copies of any requests made and studies completed.

The Bear Swamp Upgrade was done under interconnection request 592, 1194 and 1264. All of those interconnection requests have gone commercial. As a result, Bear Swamp has an active Large Generator Interconnection Agreement with ISO-NE and National Grid, effective January 5, 2023. The LGIA has a twenty-year term and is automatically renewed for each successive one-year period thereafter.

6.4 Please provide cost estimates for any and all necessary network (transmission and/or distribution) upgrades identified in the studies identified in 6.2, or otherwise known to the bidder, and any payments that have been made towards those upgrades.

Associated costs have been incurred and the work is completed.

6.5 Provide the electrical models for both Transmission and Distribution Projects for transmission level power flow analysis of all energy resources supporting the proposed project in accordance with the filing requirements of the ISO-NE Tariff Schedule 22 and 23. Distribution Projects should indicate the substation bus (not feeder) at which injected power is expected. NOTE: Short-circuit, stability, and PSCAD models are not required.

- i. Power flow modeling data attached: ☐ If none, please explain:

See Folder 6.5 Confidential, which contains models and files as evidence.

6.6 Provide a copy of an electrical one-line diagram showing the interconnection facilities, the relevant facilities of the transmission and/or distribution provider, and any required network upgrades identified in the studies required in section 6.8 of this document

- i. Electrical one-line diagram attached: ☐ If none, please explain:

See Folder 6.6 Confidential, which contains one-line diagrams, interconnections and transmission diagrams of the facility as evidence.

6.7 Specify and describe the current or new interconnection facilities (lines, transformers, switching equipment, system protection and controls, etc.) that bidder owns or is intending to construct or have constructed in order to deliver the proposed energy, to the extent presently known.

See Interconnection Agreement in Folder 6.7 Confidential as evidence that bidder can deliver the proposed energy.

6.8 Please detail with supporting information and studies (as available) that the production/delivery profile contemplated in your proposal reflects constraints or curtailments, if any, after the upgrades that are expected to take place for a Transmission Project, pursuant to interconnection at an equivalent to the CCIS. For a Distribution Project, detail any transmission or distribution upgrades expected to take place to establish eCNRC, to the extent presently known. If you are planning to make voluntary upgrades beyond those associated with the CCIS-equivalent standard or the eCNRC, please describe the transmission and/or distribution network upgrades necessary, their estimated cost (for which the bidder would have cost responsibility), and the impact on the proposed generation schedule by reducing remaining constraints or curtailments.

See Bear Swamp Upgrade SIS in Folder 6.8 Confidential for supporting information on system capability and confirmation of the absence of material constraints. Specifically, required work included replacing the 230kV conductor station at Rotterdam Station (NY) and installing a 2nd capacitor bank on 115kV bus #2 and increasing the size of the 1st 115kV capacitor bank off bus #1 at Bear Swamp station.

Section A-7: Siting, Permitting and Community Support

Please answer the following questions in Section A-7 for each Transmission Project and Distribution Project being bid:

7.1 This section addresses permitting and other regulatory issues associated with project siting, development and operations for all phases of the project (including generation, delivery, storage, interconnection, etc.), and in all jurisdictions (state, local, federal). Provide a site plan (or plans) including a map (or maps) that clearly identifies the location of the proposed project site, energy storage project locations, the assumed right-of-way width, the total acreage for the Energy Storage System, the anticipated interconnection point (or, if applicable, multiple interconnection points), the related transmission and interconnection facilities, deployment facilities, and the relationship of the site to other local infrastructure, including transmission and distribution facilities, roadways, federal and state waters, and waterways. In addition to providing the required map(s), provide a site layout plan which illustrates the location of all major equipment and facilities described above

Plan included? Yes ☐ No ☐ If not, please explain:

For Section A-7, we have attached the current FERC license and exhibits (including project boundary maps), the facility's active Water Quality Certification, NPDES Permit, Station Overview, Easement Documents, the July 2025 Independent Engineer's Report, and the most recent FERC Part 12D Safety Inspection Report, all of which can be found by accessing Folder 7 General and Folder 7 General Confidential. Together, these documents provide comprehensive evidence of Bear Swamp's licensing status, water quality compliance, operational condition, and adherence to all applicable federal, state, and local requirements.

Bear Swamp Pumped Storage is an existing, fully permitted 666 MW hydroelectric facility located in Florida and Rowe, on the Deerfield River. The project has been in continuous operation since 1974 and holds all necessary federal, state, and local approvals, including an active FERC license (Project No. 2669). The site includes the upper and lower reservoirs, two reversible Francis pump-turbines, motor-generators, intake and tailrace structures, powerhouse, transmission interconnection facilities, and associated roadways and utility infrastructure. The facility interconnects to the ISO-NE grid via an existing high-voltage transmission line to the designated delivery point. All major components and infrastructure are located within the current project boundary. The attached site plan and maps identify the project footprint, interconnection facilities, right-of-way limits, transmission corridors, and the relationship of the facility to local infrastructure, waterways, and state and federal waters.

7.2 Identify any real property rights (e.g., fee-owned parcels, rights-of-way, development rights or easements or leases, or options to purchase or lease) that provide the right to use the

energy storage site any rights of way needed for interconnection.

- i. Does the project have a right to use the eligible facility site for the entire proposed term of the LTC (e.g., by virtue of ownership or land development rights obtained from the owner)? Yes ☐ No ☐ If not, please explain.
- ii. If so, please detail the bidder's rights to control the Energy Storage System site and interconnection locations.
- iii. Describe the status of acquisition of real property rights, any options in place for the exercise of these rights and describe the plan for securing the necessary real property rights, including the proposed timeline. Include these plans and the timeline in the overall project timeline.
- iv. Identify any joint use of existing or proposed real property rights
- v. Provide a copy of each of the leases, agreements, including option agreements, easements, rights of way and related documents granting the right to use the energy storage system site and transmission and interconnection locations (and applicable letters of intent if formal agreements have not been executed)

Land use and property boundaries required for operations are established as part of Bear Swamp's FERC license (FERC Project No. 2669). See Folder 7 General/Folder 7 General Confidential and Folder 7.2 Confidential.

7.3 Provide evidence that the Energy Storage System site and interconnection locations are properly zoned or permitted. If the Energy Storage System site and interconnection locations are not currently zoned or permitted properly, identify present and required zoning and/or land use designations and permits and provide a permitting plan and timeline to secure the necessary approvals.

Bear Swamp Pumped Storage operates under a valid FERC license (Project No. 2669), which serves as the primary federal authorization for the facility and preempts local zoning restrictions for project lands within the licensed boundary. The project has been in continuous operation since 1974 in full compliance with its license terms and applicable state and federal regulations. All necessary environmental permits, water use authorizations, and operational approvals are maintained in accordance with Massachusetts and federal requirements.

7.4 Permitting plan and timeline - Enter appropriate explanation in this space or reference applicable attachment(s) Start Date: End Date:

Bear Swamp is an existing, fully permitted 666 MW pumped storage facility operating under an active FERC license (Project No. 2669). No new zoning or major environmental permits are required for ongoing operations. All permits are maintained in compliance with federal and state requirements, with renewals and reporting occurring on established regulatory

schedules.

7.5 Provide a description of the area surrounding the Energy Storage System site and interconnection locations, including a description of the local zoning, flood plain and aquifer information, existing land or waterway use, and setting.

Bear Swamp Pumped Storage is located in a rural, forested area spanning the towns of Florida and Rowe, within the Deerfield River watershed. The site is situated in steep, wooded terrain with limited surrounding development, primarily forest conservation lands and recreational areas. The upper and lower reservoirs are integral to the facility's operation and are part of the FERC-licensed project boundary. Local zoning is consistent with existing hydropower use, and the federal license preempts local restrictions within the project boundary. Portions of the lower reservoir shoreline fall within mapped floodplain areas, which are managed in accordance with the project's FERC-approved operating plan. The site is not located over a designated public aquifer recharge area. Existing land and water uses include hydropower generation, recreation, and habitat conservation, with the interconnection facilities located on controlled project lands directly adjacent to existing transmission corridors. Folder 7.5 contains more detail on facility overview.

7.6 If the bidder does not have interconnection facilities site control describe the status of the plan to obtain that control.

N/A

7.7 Provide a list of all the permits, licenses, and environmental assessments and/or environmental impact statements required to construct and operate the project and progress towards each of them to date. Along with this list, identify the governmental agencies and municipalities that are responsible for issuing approval of all the permits, licenses, and environmental assessments and/or environmental impact statements. If a bidder has secured any permit or has applied for a permit, please indicate this in the response.

See Folder 7 General, Folder 7 General Confidential and Folder 7.7 for active permits and licenses.

Bear Swamp operates under a comprehensive set of permits and licenses at the federal, state, and local levels:

Federal

- *Federal Energy Regulatory Commission (FERC) – Project License originally issued by the Federal Power Commission on April 28, 1970, and amended on April 4, 1997, and August 13, 2008; new license issued November 26, 2025.*
- *U.S. Army Corps of Engineers (USACE) – Section 404 Clean Water Act authorization for project structures involving discharge of fill material.*
- *U.S. Environmental Protection Agency (EPA) / MassDEP – National Pollutant Discharge Elimination System (NPDES) permit for project discharges.*
- *U.S. Fish and Wildlife Service (USFWS) – Endangered Species Act consultations, as applicable.*

- *Advisory Council on Historic Preservation / National Park Service – Section 106 reviews for cultural and historic resources, tied to FERC licensing*

State of Massachusetts

- *Massachusetts Department of Environmental Protection (MassDEP) – Most recent 401 Water Quality Certificate (included with updated FERC license); oversight of NPDES program in coordination with EPA.*
 - *Massachusetts Division of Fisheries & Wildlife – Rare species review under the Natural Heritage & Endangered Species Program (NHESP).*
 - *Massachusetts Historical Commission (SHPO) – Cultural/historic preservation compliance.*
 - *Massachusetts Department of Conservation & Recreation (DCR) – Dam safety oversight at the state level.*
 - *Air quality permits for emergency generation equipment, as applicable.*
- Local (Towns of Rowe, Monroe, Charlemont, and Florida, MA)*
- *Municipal tax obligations and related agreements.*

Together, these permits and approvals ensure that Bear Swamp remains in compliance with all federal, state, and local regulatory requirements for hydropower operations.

7.8 Provide the anticipated timeline for seeking and receiving the required permits, licenses, and environmental assessments and/or environmental impact statements. Include a project approval assessment which describes, in narrative form, each segment of the process, the required permit or approval, the status of the request or application and the basis for projection of success by the milestone date. All requirements should be included in the project schedule in Section 10.

Bear Swamp is an existing 666 MW pumped storage facility operating under an active FERC license (Project No. 2669), with all required state and federal permits in place. No new permits, licenses, or environmental reviews are required to deliver the proposed project.

7.9 Provide information (a) demonstrating past and current productive relationships with host communities, federally recognized and state acknowledged tribes, Environmental Justice communities and other stakeholders; and (b) demonstrating your track record of avoiding, minimizing, and mitigating environmental, tribal, and environmental justice impacts from energy storage projects similar to the proposed project.

The project is subject to the October 6, 1994 Offer of Settlement Agreement, established during the relicensing of the Deerfield River Projects. This agreement, negotiated by New England Power Company (the former licensee of the Deerfield River and Bear Swamp Projects) and twelve stakeholders—including federal and state resource agencies, environmental organizations, and recreational groups—outlines key operational and community commitments. Bear Swamp supports 106 annual whitewater releases to benefit the rafting community and maintains several recreational assets: the Zoar Picnic Area, access points for trout fishing and rafting outfitters, boat put-in and takeout locations along the Deerfield River, and 12 miles of public hiking trails. The project also contributes to river ecosystem health through a recently increased seasonal minimum flow—from 125 cfs to 225

cfs—supporting Brown Trout spawning. Additionally, a seasonal Bear Swamp Visitors Center educates the public on pumped storage technology and the region’s history, ecology, and attractions. Brookfield Renewable N.A. furthers community engagement through an annual charitable giving initiative that supports local nonprofits. Several communities within Bear Swamp’s project boundary, as well as surrounding communities, are designated Environmental Justice communities which benefit from Bear Swamp’s economic impact (taxes paid, direct and indirect employment), charitable giving and recreational opportunities.

The existence and operation of hydropower and storage on the Deerfield River has been so successful in establishing a fishery, the State of Massachusetts has stopped stocking the river in recent years because of the power companies' watershed management. Absent storage water, the Deerfield River would be a small brook during typically dry, summer conditions.

7.10 Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. Include information on specific host community and localized support and/or opposition to the project of which the bidder is aware. Provide copies of any agreements with communities and other constituencies impacted by the project. Provide a stakeholder map and a plan for community engagement activities and targeted stakeholder outreach.

Public support for the Bear Swamp Project is anchored in a long-standing stakeholder agreement and ongoing community involvement. The project operates under a new FERC license dated November 26, 2025, that acts in unison with a October 6, 1994 Offer of Settlement Agreement, developed during the Deerfield River Projects’ prior relicensing process. This agreement was negotiated with twelve parties, including federal and state agencies, environmental groups, and recreational stakeholders—demonstrating broad regional engagement and support.

As part of the Bear Swamp Settlement Agreement, Bear Swamp holds an annual meeting with all river user organizations to ensure transparent communication and coordination. In addition, frequent interactions occur with the public throughout the rafting and fishing seasons, further reinforcing relationships with recreational users. Notably, Bear Swamp maintains regular engagement with Trout Unlimited (TU), supporting habitat and fishery health along the Deerfield River.

The project delivers tangible community benefits, including 106 annual whitewater releases, recreational infrastructure (picnic areas, boating access, hiking trails), and ecological stewardship through enhanced minimum flows to support fish spawning. The seasonal Bear Swamp Visitors Center provides public education on pumped storage and the region’s natural and cultural resources. Brookfield Renewable N.A. also maintains an annual charitable giving initiative, supporting local nonprofits and reinforcing its commitment to the surrounding communities.

Section A-8: Safety Plan

Please answer the following questions in Section A-8 for each Transmission Project and Distribution Project being bid:

8.1 Please attach as detailed a safety plan as possible, given the stage of the project, which demonstrates compliance or intent to comply with all relevant federal, state, and local laws, codes, and standards. Safety plans must at a minimum comprise the following elements:

- i. Energy Storage System project drawings: Provide final, draft, or preliminary project drawings, including as much detail as known at the time of bid submission.
- ii. Fire protection datasheets: Provide final, draft, or proposed technology fire protection system datasheets for the project.
- iii. UL equipment listings and certifications: List plans to comply with the applicable UL equipment listings and certifications. Optionally, bidders may provide supplemental commentary related to UL equipment listings and certifications that they believe may be relevant or useful to the Evaluation Team for the purpose of evaluating the bid.
- iv. Hazard mitigation analysis: Provide a final, draft, or plans to develop a project site-specific Hazard Mitigation Analysis (HMA), addressing thermal runaway, mechanical failures, and other potential equipment failures.
- v. Emergency response plan: Provide a final, draft, or plans to develop a project site-specific Emergency Response Plan (ERP).
- vi. Safety training materials: Provide final, draft, or plans to develop project site-specific safety training materials.
- vii. Explosion control: Provide final, draft, or plans to develop project-specific explosion control designs, including plans to comply with the applicable UL test results standards and plans to comply with applicable NFPA requirements.

See attached as evidence in Folders 8.1 Confidential and 8.2 Confidential Bear Swamp Power Company's "Public Safety Plan" and "Emergency Action Plan (EAP)".

Both documents are required by FERC and are developed in accordance with FERC guidelines to ensure full compliance with all applicable federal, state, and local laws, codes, and standards. The EAP is submitted to FERC and shared with local emergency management agencies for their review and coordination.

These plans outline detailed response protocols for various scenarios. Local emergency services are responsible for public notification, warning, and evacuation procedures as needed, while Bear Swamp personnel are trained to respond in alignment with the EAP, ensuring a coordinated and effective safety response.

8.2 Please include a discussion on incident preparedness and address all steps the project has taken to avoid potential safety issues, mitigate safety issues when they occur, and protect property, personnel, and the surrounding community.

See Folders 8.1 Confidential and 8.2 Confidential which include Bear Swamp Power Company's "Public Safety Plan" and "Emergency Action Plan (EAP)".

Bear Swamp Power Company maintains a comprehensive Emergency Action Plan (EAP) and Public Safety Plan, both of which are required by the Federal Energy Regulatory Commission (FERC). These plans are developed in strict accordance with FERC guidelines, submitted for regulatory review, and shared with local emergency management agencies. They are designed to ensure full compliance with all federal, state, and local safety standards while protecting personnel, property, and the surrounding community.

To support incident preparedness, a copy of the EAP is maintained on-site in the Bear Swamp Control Room for immediate access. Staff are trained to follow established procedures tailored to specific emergency scenarios. Regular readiness activities include annual notification drills using an automated call-out system, as well as full-scale functional exercises every five years involving government agencies, local responders, and other river system operators.

Additionally, Bear Swamp conducts annual site visits with local first responders to familiarize them with facility layout, potential hazards, and emergency protocols. These proactive measures strengthen coordination, improve response times, and reduce risk in the event of an actual emergency.

8.3 Please describe plans and measures to operate the facility safely, including but not limited to monitoring and maintenance procedures, mitigation features and potential failure modes.

See Folder 8.3 Confidential. Bear Swamp Power Company maintains a structured and proactive approach to safety through comprehensive monitoring, maintenance, and mitigation measures. As detailed in the provided materials, Preventive Maintenance Work Orders and tasks encompass Regulatory & Dam Safety, Health & Safety, and Environmental tasks which are essential to ensuring the safe and reliable operation of the plant while protecting the public and the surrounding environment.

Operational safety is further supported by established procedures followed by trained personnel. These procedures guide daily operations and maintenance activities, ensuring consistency and adherence to safety standards.

The facility is equipped with critical alarm and trip systems to provide real-time monitoring and automatic shutdowns when necessary. These systems are designed to mitigate the impact of potential failure modes, which could include mechanical, electrical, environmental, or dam safety events. By combining procedural discipline with active system monitoring and preventative maintenance, Bear Swamp ensures continuous and secure facility operations.

8.4 Please describe consequences resulting from various levels of potential failures and

safety events.

Bear Swamp Power Company applies a rigorous, structured approach to safety, integrating real-time monitoring, preventive maintenance, and clearly defined mitigation procedures. As documented in Folder 8.3 Confidential, the facility manages 321 Preventive Maintenance Work Orders covering Regulatory & Dam Safety, Health & Safety, and Environmental activities— each aimed at ensuring the continuous safe operation of the plant and protecting public and environmental welfare.

Trained personnel follow standardized operational and maintenance procedures that align with industry best practices and regulatory requirements. These are complemented by automated alarm and trip systems that provide real-time monitoring and can initiate protective shutdowns to mitigate the impact of failure scenarios.

[REDACTED]

[REDACTED]

8.5 Please discuss intentions to continuously improve the safety practices while operating the facility, such as plans for regular safety audits and feedback mechanisms.

Evidence of Bear Swamp’s strong safety and compliance culture is provided in Folder 8.5 Confidential, which includes documentation of numerous audits and inspections conducted by both third-party organizations and internal Bear Swamp oversight teams. These include XL Insurance Inspections, FERC Part XII Dam Safety Inspections, Massachusetts Department of Conservation & Recreation (DCR) Inspections, Annual Dam Safety Inspections, Owner Dam Safety Audits, Brookfield Renewable Facilities Inspections, and HSSE (Health, Safety, Security & Environmental) Applications Audits. Together, these reviews provide a comprehensive and recurring assessment of the station’s compliance with regulatory requirements, operational standards, and internal safety expectations.

Bear Swamp treats these inspections as critical components of its continuous improvement process. Each audit offers an opportunity to validate practices, identify areas for enhancement, and implement corrective actions where necessary.

8.6 Please describe reporting protocols, both internally and externally.

At Bear Swamp, clear reporting lines and procedures ensure that all safety-related issues are escalated appropriately and in a timely manner. Site operators and maintenance personnel report directly to the Operations Supervisor and Operations Manager. Equipment-related concerns are escalated to the Director of Operations for further evaluation and action.

For dam safety matters, routine issues are reported to the Regional Dam Safety Engineer. In the event of an emergency or critical dam safety incident, notifications follow the structured call-down procedure outlined in the facility's Emergency Action Plan (EAP), ensuring immediate engagement with the appropriate internal and external responders.

Unplanned license deviations, permit violations, regulatory events (such as flow excursions, spills, or environmental incidents) are reported in accordance with internal reporting requirements that are aligned with state and federal laws. This protocol ensures that all relevant incidents are logged, investigated, and communicated to regulatory agencies as required, maintaining compliance and supporting continual safety improvement.

8.7 Please describe bidder's experience employing safety plans for similar projects currently under construction or in operation, including bidder's approach to risk assessment, design standards, and coordination with local authorities and emergency responders. Please describe how bidder's safety protocols have evolved over time.

Public Safety Plans and EAP's are in place for all Brookfield Renewable sites. Annual EAP drills are conducted to test communication with local authorities and emergency responders. EAP functional exercises are also held with these agencies to act out an emergency situation. Public Safety/EAP are updated as needed. Public Safety Risk assessments are performed to identify any new or potential hazards.

8.8 Have any of bidder's prior projects experienced fire incidents, thermal events, or related safety concerns? If so, please summarize the circumstances, response actions taken, and lessons learned for each relevant facility and location.

N/A

8.9 The project is encouraged to include testimonials and statements of support from local governments and first responder organizations to demonstrate robust stakeholder communication and participation in the project's safety plan. Please also provide evidence of community engagement towards acceptance of the facility, or a plan to work towards such engagement and acceptance.

Bear Swamp Power Company has established strong communication and coordination with local government agencies and first responders through its Emergency Action Plan (EAP) program. Most recently, the Bear Swamp EAP Functional Exercise (November 2023) included broad participation from MEMA, local emergency management, fire and police departments, the National Weather Service, and community organizations (See Folder 8.7 Confidential as evidence).

The exercise included: Site visits and facility tours, providing first responders with direct familiarization of our infrastructure; hands-on participation in a dam breach scenario, strengthening interagency coordination, communication protocols, and evacuation planning; networking opportunities, allowing local responders, state agencies, and company representatives to build relationships and improve readiness for a real event.

Feedback collected from the exercise confirmed the value of these efforts. Participants highlighted the benefits of improved coordination, scenario realism, and the importance of continuing such drills for both safety and preparedness. The event provided evidence of collaboration between Bear Swamp, local governments, and emergency responders, and stands as a strong demonstration of our commitment to workforce safety and community protection.

Section A-9: Engineering and Technology; Commercial Access to Equipment

This section includes questions pertinent to the engineering design and project technology. This section must be completed for all aspects of a project including but not limited to the Energy Storage System and associated operational plan and interconnection facilities. Bidders should provide information about the specific technology or equipment including the track record of the technology and equipment and other information as necessary to demonstrate that the technology is viable.

9.1 Please answer the following questions in Section A-9 for each Transmission Project and Distribution Project being bid:

Provide a reasonable but preliminary engineering plan which includes the following information:

- i. Type of energy storage technology (e.g., mechanical, chemical, thermal) and the specific details of the energy storage technology and how it works
- ii. Major equipment to be used including the components of the energy storage technology itself and surrounding system (e.g., inverter, enclosures, HVAC, meters, electrical and communication equipment, fire suppression).
- iii. Manufacturer of each of the equipment components listed above as well as the location of where each component will be manufactured.
- iv. Status of acquisition of the equipment components, including whether orders are in place and/ or production slots secured
- v. Whether the bidder has a contract for the equipment. If not, describe the bidder's plan for securing equipment and the status of any pertinent commercial arrangements
- vi. Equipment vendors selected/considered
- vii. Track record of equipment operations, including safety record
- viii. Include all UL certifications and other relevant industry codes and standards for key equipment including but not limited to storage modules, power conversion system, and/or integrated product certifications
- ix. Description of equipment warranties and guarantees, including terms and expiration
- x. If the equipment manufacturer has not yet been selected, identify in the equipment procurement strategy the factors under consideration for selecting the preferred equipment

For Section A-9, the Independent Engineer's Report (July 2025) is submitted as supporting documentation in Folder 9 General Confidential.

Bear Swamp is a 666 MW mechanical energy storage facility that began commercial operation in 1974. It is comprised of two vertical-shaft, single-runner, reversible Francis pump-turbines to store energy by pumping water from the lower reservoir to the upper reservoir during low-demand periods and releasing it through the turbines to generate electricity during peak demand.

Major Equipment – The pump-turbines were originally manufactured by Hitachi. In 2019-2022, American Hydro completed a major upgrade that included stainless steel runners, stainless steel wicket gates, new seals, and refurbished components, increasing output to 333 MW per unit and improving hydraulic performance. Each turbine is paired with a Toshiba vertical-shaft synchronous motor-generator, also commissioned in 1974 and rewound/uprated to 366 MVA by Andritz in 2016/2017. Additional equipment includes 132-inch spherical inlet valves, Woodward digital governors (upgraded by L&S Electric in the mid-2010s), a Whiting 606-ton powerhouse crane, and redundant cooling, seal water, drainage, and fire protection systems.

Manufacturing & Procurement – All major equipment is installed and operational. Future replacement components are sourced from OEMs or qualified suppliers under Brookfield's preventative maintenance and capital investment program. No new procurement is required for the current scope of operations.

Track Record – The facility has operated reliably for over 50 years, meeting ISO-NE availability targets and supporting grid reliability. The upgraded pump-turbines and motor-generators have performed to expectations since their refurbishment, with no major safety incidents.

Warranties & Guarantees –

9.2 If the bidder has not yet selected the major equipment for a project, please provide a list of the key equipment suppliers under consideration.

All major equipment for Bear Swamp is already installed, operational, and has been in continuous service since the facility began operation in 1974, with significant turbine and generator upgrades completed between 2016 and 2022. While no new equipment selection is required for the current scope, Brookfield maintains relationships with multiple qualified OEMs and suppliers to ensure ongoing reliability and rapid replacement when needed.

9.3 Please identify the same or similar equipment by the same manufacturer that are presently in commercial operation including the number installed, installed capacity and

estimated generation for the past three years.

All major equipment at Bear Swamp is operational and has been in continuous service since the facility began operation in 1974, with significant turbine and generator upgrades completed between 2016 and 2022. Major equipment that has been in commercial operation includes:

American Hydro – Turbine runners, wicket gates, seals

Andritz Hydro – Generator components

ABB – Excitation system components

Woodward – Governor controls and retrofits

Whiting Corporation – Crane and hoist parts

Local and regional machine shops – Custom fabrication and emergency repairs

9.4 For less mature technologies or equipment, provide evidence (including identifying specific applications) that the technology or equipment to be employed for energy production is ready for transfer to the design and construction phases. Also, address how the status of the technology or equipment is being considered in the financial and permitting plans for the project. Provide the status of testing/qualification for any equipment in development.

Bear Swamp utilizes proven, utility-scale pumped storage hydro technology that has been in continuous commercial operation since 1974. The facility's reversible pump-turbines and synchronous motor-generators are industry-standard designs with decades of successful performance. Major components were upgraded between 2016 and 2022, ensuring continued reliable operation. The July 2025 Independent Engineer's Report included in Folder 9 General Confidential confirms the facility meets all operational and safety requirements, demonstrating the technology's readiness and sustained viability for commercial applications.

9.5 Please indicate if the bidder has a full and complete list of equipment needed for all physical aspects of the bid, including the Energy Storage System and all equipment required for the System to fulfill its operational plan, and mandatory and voluntary transmission or distribution system upgrades. Include OEM-supplied data sheets for all equipment. If bidder does not have a full and complete list of equipment, identify the areas of uncertainty and when the full and complete list of equipment will be identified.

A list of all major equipment for Bear Swamp, which has been in operation since 1974, including the Energy Storage System (reversible pump-turbines and synchronous motor-generators) and all supporting balance-of-plant systems required to fulfill its operational plan is in place. No mandatory or voluntary transmission system upgrades are required for the scope of this bid. All major equipment, OEM details, and performance history are documented in the July 2025 Independent Engineer's Report, which is included with this

submission in Folder 9 General Confidential.

9.6 Please indicate if the bidder has secured its equipment for all physical aspects of the bid, including the Energy Storage System and all equipment required for the System to fulfill its operational plan, and mandatory and voluntary transmission or distribution system upgrades. If not, identify the long-lead equipment and describe the timing for securing this equipment.

All major equipment for Bear Swamp is fully installed, operational, and has been secured since original commissioning in 1974, with significant upgrades now completed. No additional equipment or transmission system upgrades are required for the scope of this bid.

9.7 Does bidder intend to propose any technology (1) that it, its affiliates or parent companies have used in a prior project, (2) that has been involved in a fire or thermal event anywhere in the world and (3) that necessitated a root cause analysis? If yes, please submit the root cause analysis and related documentation as part of the bid package. If no, please state that this question is not applicable.

N/A

Section A-10: Project Schedule

A bidder must demonstrate that its proposal can be developed, permitted, financed, and constructed and be technically viable within a commercially reasonable timeframe. The bidder is required to provide sufficient information and documentation that shows that the bidder's resources, process and schedule are adequate for the acquisition of all rights, permits and approvals for all aspects of the project and for the financing of the project consistent with the proposed project milestone dates.

Bidders are required to provide a complete critical path schedule for the project from the notice of selection of the project for contract consideration to the start of commercial operations. For each project element, list the start and end date. The proposal must include a schedule with reasonable detail that demonstrates that the bidder has provided sufficient time for the application for, and receipt of, necessary permits, approvals, other commitments, project financing, completion of design work, and equipment procurement and construction in order to credibly complete the project reasonably consistent with the proposed Commercial Operation Date, meaning that the project is more likely than not to come online by the date that is projected within the proposal. If a bidder is developing the project in phases, it should include a schedule for each phase. For Transmission Projects, the bidder should include critical milestones in its markup to the Form LTC that are consistent with its proposal and are reasonably achievable.

Please answer the following questions in Section A-10 for each Transmission Project and Distribution Project being bid:

10.1 Identify the elements on the critical path. The schedule should include, at a minimum, preliminary engineering, financing, acquisition of real property rights, Federal, state and/or local permits, licenses, environmental assessments and/or environmental impact statements (including anticipated permit submittal and approval dates), completion of interconnection studies and approvals, procurement, facility contracts, start of construction, construction schedule, and any other requirements that could influence the project schedule and the commercial operation date.

Bear Swamp is currently operational and holds all required interconnection rights, site control and State and Federal licenses required to operate.

10.2 Describe and demonstrate that the project is more likely than not to come online by the commercial operation date that is projected within the proposal, as evidenced by documents filed by the bidder showing the following:

- i. Commencement of permitting processes;
- ii. A plan for completing all permitting processes;
- iii. Environmental assessment;
- iv. Viable financing plans along with detailed information requested in Section 2.2.2.4;

- v. Viable installation and electrical interconnection plans;
- vi. Material progress towards the acquisition of all real property rights; and
- vii. Evidence of material vendor activity.

Bear Swamp has been in continuous operation since 1974, with all systems fully operational. As an existing facility, it is already online and capable of meeting the proposed COD with no additional construction or commissioning required.

10.3 Detail the status of all critical path items, such as receipt of all necessary siting, environmental, and ISO-NE or interconnecting Distribution Company approvals.

Bear Swamp has been in continuous operation since 1974, with all critical path items in place and functioning. Capacity upgrades eligible under the CPS program have been completed. No new equipment procurement or construction is required for this bid.

Section A-11: Construction and Logistics

This section of the proposal addresses necessary arrangements and processes for assembly, and deployment of major project components, including the Energy Storage System and all equipment required for the system to fulfill its operational plan, and other major components associated with delivery facilities.

Please provide a construction plan that captures the following objectives. If the project is being developed in phases, please break out the construction plan for each phase. Please answer the following questions in Section A-11 for each Transmission Project and Distribution Project being bid:

11.1 Please list the major tasks or steps associated with deployment of the proposed project and any necessary specialized equipment.

As Bear Swamp is a fully operational pumped storage facility that has been in service since 1974, and the capacity upgrades related to this bid have been completed. No new deployment tasks are required for the scope of this bid. Ongoing operational readiness is maintained through routine inspections, preventative maintenance and periodic equipment overhauls.

11.2 Please describe the proposed approach for staging and deployment of major project components to the project site.

Bear Swamp has been in continuous operation since 1974, with all major systems already staged, installed, and operational. No new staging or deployment is required for this bid.

11.3 List the party (e.g. the bidder, or equipment/service providers under contract to the bidder) responsible for each deployment activity and describe the role of each party. Describe the status of bidder's contractual agreements with third-party equipment/service providers.

Bear Swamp is an existing pumped storage facility that has been fully deployed and operational since 1974 and the capacity upgrades related to this bid have been completed.

Section A-12: Operations and Maintenance

Projects that can demonstrate that the operation and maintenance (“O&M”) plan, level of funding, and mechanism for funding will ensure reliable operations of all aspects of the project during the term of the contract are preferred.

Please answer the following questions in Section A-12 for each Transmission Project and Distribution Project being bid:

12.1 Provide an O&M plan for the project that demonstrates the long-term operational viability of the proposed project. The plan should include the location of the O&M base, a discussion of the staffing levels proposed for the project, the expected role of the project sponsor or equipment manufacturer/outside contractor, scheduling of major maintenance activity, and the plan for testing equipment.

Bear Swamp’s operations and maintenance (O&M) plan is fully documented and implemented in accordance with Brookfield Renewable’s corporate asset management standards. As detailed in the July 2025 Independent Engineer’s Report (in Folder 9 General Confidential), the program combines preventative, predictive, and corrective maintenance strategies to ensure sustained operational reliability and compliance with all applicable regulatory requirements.

The preventative maintenance program includes scheduled inspections, lubrication, calibration, and component replacements based on OEM recommendations and historical performance data. Predictive maintenance utilizes condition monitoring technologies such as vibration analysis, thermography, and oil sampling to identify emerging issues before they affect operations. Major equipment—such as the American Hydro reversible pump-turbines, Andritz motor-generators, inlet valves, Woodward governors, and other Balance of Plant equipment—follows defined overhaul intervals, with detailed work scopes executed by qualified personnel.

The July 2025 IE report documents recent major capital improvements, confirms that the facility’s maintenance activities meet or exceed industry best practices, and notes that the equipment is in good condition with no significant deferred maintenance. Regulatory compliance activities, including those under the FERC Part 12D Dam Safety Program and environmental permits, are integrated into the O&M schedule to ensure uninterrupted operational readiness.

Bear Swamp operations employees are shown in the organizational chart in Folder 13.3 Confidential.

12.2 Describe in detail the proposed O&M funding mechanism and funding levels to support planned and unplanned O&M requirements.

[REDACTED]

[REDACTED]

12.3 Describe the terms (or expected terms) of the warranties and/or guarantees on major equipment that the bidder is utilizing or proposing to utilize.

[REDACTED]

12.4 Describe the status of the project sponsor in securing any O&M agreements or contracts. Include a discussion of the sponsor's plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.

There are no standing third-party O&M agreements in place for Bear Swamp. Day-to-day operations and routine maintenance are performed on-site by Brookfield Renewable personnel. Large capital projects and major maintenance activities are contracted out to qualified vendors as needed, with all associated costs accounted for in the facility's annual budget and long-term financial planning.

12.5 Provide examples of the bidder's experience with O&M services for other similar projects.

Brookfield Renewable has extensive experience operating and maintaining hydroelectric facilities across North America. At Bear Swamp, which has been in continuous operation since 1974, there are no standing O&M contracts in place. Day-to-day operations and routine maintenance are performed entirely by Brookfield personnel. Large capital and major maintenance projects are contracted out to qualified vendors on a project-by-project basis, consistent with Brookfield's practices at other similar facilities.

Section A-13: Project Management and Experience

Bidders are required to demonstrate project experience and management capability to successfully develop and operate all aspects of the project proposed. The Evaluation Team is particularly interested in project teams that have demonstrated success in projects of similar type, size and technology and can demonstrate an ability to work together effectively to bring the project to commercial operation in a timely fashion.

For all project-specific questions in Section A-13, if bidding in multiple Transmission Projects or Distribution Projects, please answer each question for each Transmission Project or Distribution Project being bid.

13.1 Provide an organizational chart for the project that lists the project participants and identifies the corporate structure, including general and limited partners.

See Folder 5.2 Confidential.

13.2 Provide statements that list the specific experience of the bidder and each of the project participants (including, when applicable, the bidder, partners, and proposed contractors), in developing, financing, owning, and operating generating and delivery facilities, other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.

As referenced in Folder 13.2 Confidential, Brookfield Renewable has a substantial track record of developing and re-developing large-scale renewable energy projects. All functions related to the projects included in 13.2 Confidential have been completed.

13.3 Provide a management chart that lists the key personnel dedicated to this project and provide resumes of the key personnel. Key personnel of the bidder's development team having substantial project management responsibilities must have:

- i. Successfully developed and/or operated one or more projects of similar size or complexity or requiring similar skill sets; and
- ii. Experience in financing power generation projects (or have the financial means to finance the project on the bidder's balance sheet).

Bear Swamp is fully operational and supported by the direct employment of 17 full-time staff with many years of experience in safe and reliable operations of the facility (found in Folder 13.3 Confidential).

Brookfield Renewable has significant experience in financing new and existing large-scale energy projects, including Bear Swamp, and a large team supporting commercial, mid-office and back-office functions with deep familiarity in optimizing Bear Swamp and administering transactions of this nature.

The commercial team directly supporting this opportunity includes:

- *John Jay –Regional Vice President, New England + PJM (Trading and Origination)*
- *Steven Zuretti – Senior Director, Origination and Policy*

13.4 Provide a listing of all projects the project sponsor has successfully developed or that are currently under construction. Provide the following information as part of the response:

- i. Name of the project
- ii. Location of the project
- iii. Project type, size and technology
- iv. Commercial operation date
- v. Availability factor of the project for the past three years
- vi. Safety record
- vii. References, including the names and current addresses and telephone numbers of individuals to contact for each reference.

See Folder 13.2.

13.5 If the bidder's previous project experience is primarily or entirely outside of Massachusetts and/or the Northeast, describe how the skills and perspectives of this non-local experience will be beneficial to successfully developing the bid(s) under this RFP.

Brookfield Renewable N.A. has significant experience both within the Northeast and throughout the U.S. and Canada, and we have deep experience successfully navigating commercial opportunities from RFP submittal through contract execution and delivery.

13.6 With regard to the bidder's project team, identify and describe the entity responsible for the following, as applicable:

- i. Construction Period Lender – *N/A*
- ii. Operating Period Lender and/or Tax Equity Provider – *Pacific Life, Voya and Nuveen*
- iii. Financial Advisor – *N/A*
- iv. Environmental Consultant – [REDACTED]
- v. Facility Operator and Manager – *Brookfield Renewable N.A.*
- vi. Owner's Engineer – [REDACTED]

vii. Transmission/Delivery Consultant – [REDACTED]

viii. Legal Counsel – [REDACTED]

13.7 Describe the experience and expertise of the bidder and project team needed to successfully develop, finance, construct, and operate and maintain its proposed eligible project on schedule and according to the bidder's commitments to a competitive procurement process. Describe the Bidder's continuity of corporate management through successful project development.

Bear Swamp is an operating asset with the upgrades applicable to this bid fully completed.

Brookfield Renewable has over 120 years of experience in power generation. With its North American business headquartered in New York, N.Y., Brookfield Renewable N.A.'s platform owns and operates hydropower, wind, solar, and storage facilities across 34 states. The North American platform consists of over 190 utility-scale renewable facilities and over 5,400 distributed generation solar projects, totaling approximately 17,000 MW in nameplate capacity. Our utility-scale portfolio continues to grow with a diversified pipeline of renewable development projects totaling over 70 GW. In recent years, Brookfield has expanded its portfolio through acquisitions of several renewable platforms, including TerraForm Power, Urban Grid, Scout Clean Energy, X-Elio, Deriva Energy (formerly Duke Energy Renewables), Standard Solar, Geronimo Power, Boralex, and Aypa. Brookfield's portfolio of projects includes both acquired operating projects and greenfield projects developed directly by Brookfield and its portfolio companies. The company has a world class capital markets team to arrange both construction and term financing and to secure tax equity as applicable for its project portfolio. Brookfield also leverages a centralized procurement structure to secure major equipment and EPC services, leveraging the scale of its activities both in North America and abroad.

13.8 Describe the Bidder's track record developing similar projects, including consideration of any project delays, amendments, defaults, and performance issues, including on prior long-term contracts. Describe any prior failures to achieve commercial operation dates under other contracts and provide a credible description of how the current proposed project will avoid similar project delays or development issues if applicable.

All projects in the reference list provided in 13.2 have achieved COD and are compliant with their offtake (PPA) obligations as applicable. Furthermore, the Bear Swamp upgrades that are subject to this bid have been completed and are fully operational, therefore no delays or development risks are applicable.

13.9 Describe the bidder's relevant experience supporting similar projects in a state or federal regulatory or judicial forum. This experience can be established with examples of one or more key member(s) of the development team advocating in favor of a similar project in a regulatory proceeding, before a court, or in another tribunal.

Brookfield is one of the largest owners of FERC Licensed facilities in the U.S. Steve Murphy, Director of Licensing has supported the recent relicensing effort at Bear Swamp. There is

currently a team of 3 individuals in the U.S., who, along with a team of consultants, are managing multiple relicensing efforts every year. This effort consists of working with regulators and NGO's to establish a new 40 +/- yr license on a facility by facility basis. Brookfield Renewable currently holds 83 FERC licenses. Ongoing license compliance obligations are supported by a team led by Randy Dorman, Senior Compliance Manager.

13.10 If the bidder or any of its past or present affiliates has either (1) been involved with a complex development project that failed, was withdrawn, or otherwise did not proceed, or (2) defaulted under, or agreed to terminate a contract for a complex development project, then the bidder should provide relevant details.

Brookfield Renewable N.A. has not defaulted on any development projects with executed PPAs.

Section A-14: Economic Development and Employment Benefits, Transitioning Fossil Fuel Communities, Benefits to Low Income Ratepayers and Environmental Justice Communities, and Other Benefits

For all project-specific questions in Section A-14, if bidding in multiple Transmission Projects or Distribution Projects, please answer each question for each Transmission Project or Distribution Project being bid:

14.1 Please provide an estimate of the number of jobs to be created directly during project development and construction, and during operations, and a general description of the types of jobs created, duration of employment, estimated annual compensation, the employer(s) for such jobs, and the location. Employment impacts should be broken out by state and the region as a whole and highlight any impacts in economically distressed areas, including former fossil fuel communities. Please treat the development, construction, and operation and maintenance periods separately in your response. All information provided must be measurable.

Bear Swamp operations are currently supported by 17 full-time employees (see Folder 13.3 Confidential) who live in close proximity to the facility, including within and nearby Environmental Justice communities. All 17 of these full-time jobs are located at the Bear Swamp facility in Florida and Rowe, the latter which is an Environmental Justice community. Operations employees are compensated according to the terms of the Collective Bargaining Agreement referenced in 14.3 below. In addition, in a typical year, Bear Swamp utilizes more than 80 vendors to support facility operations. Of these vendors, nearly a quarter are located in Massachusetts, and many are located in mapped Environmental Justice communities, including Pittsfield, Monson, Dalton, Greenfield, Westfield and Agawam. Overall, operations support several hundred indirect jobs, including dozens within central and western Massachusetts – many of which are in Environmental Justice communities. Non-local vendors often require on-site work which includes workers supporting hospitality functions in proximity to Bear Swamp and nearby Environmental Justice communities like North Adams. Information on vendors is included in Folder 14 General Confidential.

During the process to upgrade Bear Swamp capacity, nearly fifty vendors were utilized and approximately 175 unique jobs were supported – the majority of which were workers on-site for months at a time, and many were on-site for a full year or longer. In 2022 alone, the project required 98 workers across more than 20 vendors. Bringing these contractors to the site significantly supported the local hospitality industry, including in the Environmental Justice communities surrounding the facility. Additional information, including compensation estimates, is included in Folder 14 General Confidential.

As described in more detail below in 14.5, Yankee Rowe Nuclear Power Station was formerly a major employer in the area but ceased commercial operations in the 1990s. Due to the retirement of the nuclear plant and the drying up of mining opportunities, economic opportunities in the area diminished. Although Yankee Row was a nuclear facility, not a fossil fuel facility, the effects on the community of the closure of Yankee Rowe are similar to those faced by former fossil fuel communities, and Bear Swamp provides employment opportunities and economic activity in the surrounding affected communities.

14.2 Please describe employment opportunities for members of federally recognized and state acknowledged tribes in the Commonwealth, workers from low-income communities and certified minority-owned and women-owned small business enterprises in the Commonwealth, as well residents of any Environmental Justice neighborhoods impacted by the project.

As an existing facility, Bear Swamp's workforce is fully established and supported by union employees, as detailed below. As mentioned in 14.1, direct employees and vendors utilized include residents of Environmental Justice communities and family-owned businesses local to central and western Massachusetts. Bear Swamp is located in the midst of and adjacent to many communities that have been mapped as environmental justice populations, primarily on the basis of income. As a result, it provides union jobs that are accessible to members of these communities and generates economic activity that supports the local businesses in these communities. Our hiring practices (as partially highlighted in 14.8) are designed to reduce barriers to employment and provide support for individuals from these areas and we aim to contribute to the economic well-being of these communities by creating accessible career pathways.

14.3 Please describe project support for workforce harmony and community benefits through Community Benefits Agreements and workforce agreements with appropriate labor organizations for construction, renovation, reconstruction, alteration, installation, demolition, expansion, maintenance and repair, if applicable.

Brookfield Power New England, LLC maintains an active Collective Bargaining Agreement (See Folder 14 General Confidential) with the International Brotherhood of Electrical Workers Local Union 97, which establishes fair wages, benefits, training opportunities, and dispute resolution procedures covering Bear Swamp union employees. The agreement includes provisions supporting job security while fostering community benefits through stable, equitable employment and local workforce development.

In addition, Bear Swamp Power Company is a Federal Energy Regulatory Commission licensee. The requirements of a FERC license and a Community Benefits Agreement share a foundational similarity in that both are designed to ensure that infrastructure projects serve the public interest by balancing economic development with environmental protection and community well-being.

Bear Swamp also supports and enables regionally significant recreational and leisure activities, which benefit employees, host communities, and the broader region surrounding the facility, including the host and nearby communities that have been mapped as

environmental justice populations. These benefits include coordination with other stakeholders to enable broadly accessible recreational and cultural activities and are described in more detail below in 14.5.

14.4 Please describe the status of any contractual commitments with respect to direct job creation and provide any pertinent agreements that have been executed, if applicable.

Brookfield Power New England, LLC currently maintains an active and valid Collective Bargaining Agreement (See Folder 14 General Confidential) with the International Brotherhood of Electrical Workers Local Union 97, affiliated with the American Federation of Labor and the Congress of Industrial Organizations. The current Agreement term began August 1, 2026 and runs through July 31, 2030.

The existence of this updated and active agreement demonstrates Brookfield's ongoing commitment to structured labor relations and workforce development through contractual commitments.

14.5 Please describe and quantify any other economic activity or development expected to result directly from the proposed project. Impacts should be broken out by state and the region as a whole and highlight any impacts in economically distressed areas or former fossil fuel communities. Direct economic activity/development will be evaluated based on scale relative to project size, credibility and firmness. Preference will be given to commitments that secure long-term benefits; begin to provide benefits during project development, construction, installation, and the first five years of operations; direct benefits to Environmental Justice populations and host communities.

Bear Swamp Project is located on the Deerfield River, in Berkshire and Franklin counties, Massachusetts. As an operational facility, the project provides ongoing economic activity in Western Massachusetts through direct employment, local procurement, municipal tax payments, recreation-related tourism, and community investment. The project supports long-term economic activity in Berkshire and Franklin Counties, including in Environmental Justice communities (see 14.1 and 14.2) and communities with a history of energy-sector employment. The economic benefits associated with Bear Swamp are not prospective or speculative. They are existing, ongoing, measurable, and durable.

Background

The project is predominantly forested with less than 10% agricultural lands and with approximately 93% primarily undeveloped. Historically, the communities around Bear Swamp had worked in mining and energy generation. Rowe hosted the Yankee Rowe Nuclear Power Station from 1960 until its retirement in 1992. With the shuttering of the nuclear plant and the cessation of mining activities, Bear Swamp has emerged as a relatively large portion of the local economy, generating stable jobs and tax revenue for the surrounding region.

Property Tax

The facility pays property taxes to the communities of Florida, Rowe, and Charlemont—the latter two of which are identified as EJ communities based on income. For the 2023 through

2025 property tax years, Bear Swamp Power Company has contributed \$5.26 million, \$11.08 million, and approximately \$4,000 in taxes, respectively, to these communities. Its property holding in Charlemont consists of the publicly accessible Zoar Picnic Area, whereas Florida and Rowe serve as the host communities for both the Bear Swamp Pumped Storage facility and the Fife Brook dam on the Deerfield River and its corresponding physical infrastructure.

Recreation and Tourism

Bear Swamp directly supports an established outdoor recreation economy on the Deerfield River that includes commercial rafting operations, recreational fishing, whitewater paddling events, visitor spending, and tourism-related activity in Franklin and Berkshire Counties. These recreational opportunities and associated economic activity provide significant benefits to the surrounding communities, including those communities that have been mapped as Environmental Justice populations, and are substantially supported by the operation of Bear Swamp and related hydropower infrastructure on the Deerfield River.

Visitor Information and Education

The company constructed and maintains a publicly accessible visitor center to provide project information, sight-seeing, and picnic facilities. The center features an underground display containing models of both reservoirs and a cutaway model of the underground powerhouse. The center attracts numerous guests annually, supporting domestic tourism and recreation interests in the region. The Visitor's Center is open from Memorial Day weekend until Columbus Day/Indigenous Peoples' Day weekend (8am-4pm every Friday, Saturday, and Sunday) and at other times by pre-arrangement.

Recreational Facilities

In addition to educational information, the Bear Swamp Project provides public access to project lands for use as picnic areas, hiking trails, and parking space for fishing access.

The Fife Brook Overlook Hiking Trail is located near the Bear Swamp Upper Reservoir in Rowe, Massachusetts. This recreational hiking trail is accessible from Tunnel Road and includes views of the Deerfield River valley, the lower reservoir, and Fife Brook Dam and power station. A parking area is at the trailhead and can be used in late spring, summer, and fall. The Fife Brook Overlook Hiking Trail and connected Hoosic Tunnel Loop stretch 10 miles from the Monroe Bridge to the Zoar Picnic Area.

Located several hundred feet downstream of the Fife Brook Dam is an area where recreationists can access Project waters for canoeing, kayaking, rafting, or fishing. Located here are portable restroom facilities, a stairway leading to the river, a slide system allowing canoeists, rafters, and kayakers to lower their watercraft to the river, and parking.

Seven miles downstream in Charlemont is another maintained recreational site known as the Zoar Picnic Area, where the public may picnic, fish, canoe, kayak, or raft the Deerfield River. Located here are portable restroom facilities, concrete picnic tables, and barbeque grills. A memorial bench is also placed at this site and is dedicated in memory

of an angler who was instrumental in designating the Deerfield River a catch and release river.

Together, these facilities provide public access to the Deerfield River and support recreational uses that attract visitors to the region and contribute to local tourism spending.

River-based Activities

Angling has proven to be a favorite pastime for the region, with Bear Swamp particularly popular during the State of Massachusetts' annual free fishing weekend each June. Indeed, the existence and operation of hydropower and storage on the Deerfield River has been so successful in establishing a fishery that the Commonwealth has stopped stocking the river in recent years because of watershed management practices undertaken by the hydropower operators. This sustained recreational fishery continues to support tourism, guide services, and local businesses throughout the Deerfield River corridor.

In addition to the Massachusetts free fishing weekend, Bear Swamp directly enables a nationally recognized whitewater recreation economy on the Deerfield River. Our presence directly supports community events including the Charlemont Downriver Race (<https://paddlestats.net/r/CHARLEMONT/2025>) and the annual Deerfield River Festival (<https://berkshireeast.com/plan/events/12-special-events/283-deerfield-riverfest-2>). Since 2019, Pride Day on the River (<https://www.pridedayontheriver.org/>), a volunteer-led whitewater paddlesports community dedicated to LGBTQIA2S+ participation and visibility on the river, has hosted the nation's first whitewater queer pride event annually on the Deerfield River in Charlemont, Massachusetts (see more: <https://youtu.be/T-3F3-uHiFk>). In October 2025, the New England Canoe and Kayak Racing Association hosted their Deerfield Valley Canoe and Kayak Race (<https://www.neckra.org/races>), and, in 2024, the American Canoe Association hosted their Whitewater National Championships on the Deerfield River (<https://americancanoe.org/wp-content/uploads/2024/05/USA-Whitewater-Nationals-Bulletin.pdf>).

Notably, the Deerfield River also offers Class I to Class IV rapids, providing an exciting yet family-friendly rafting experience. In addition to private river users, professional rafting outfitters such as Berkshire East Mountain Resort, Crab Apple Whitewater, and Zoar Outdoor organize paid rafting trips. In partnership with Great River Hydro, an upstream hydroelectric operator, Bear Swamp Power Company schedules 106 whitewater releases annually, each lasting a minimum of three hours at flows between 700–1100 cfs. These flows are coordinated annually with rafting outfitters and private paddlers and posted on the Safe Waters website (<https://safewaters.com/facility/fife-brook>) to ensure the recreating public can plan their trips to the region.

Under its new FERC license, Bear Swamp will be incorporating three new recreational facilities into our area of responsibility. These will be located at the Carbis Bend of the Deerfield River (less than one mile downstream of Fife Brook), the colloquially known “Bridge to Nowhere” in the vicinity of River Road and Whitcomb Hill Road, and an upstream take-out site and boater egress trail for rafters and boaters using the so-called dryway on the Deerfield River upstream of Bear Swamp's lower reservoir. We also plan to

create additional parking at the Fife Brook Fishing and Boating Access Area and to install and maintain additional seasonal restrooms, a changing facility, and a new staircase to support river access at the Zoar Picnic Area.

Unlike many proposed projects whose future economic impacts remain contingent on permitting and construction, Bear Swamp's contributions to recreation, tourism, local businesses, and host communities are already established, measurable, and expected to continue throughout the contract term.

14.6 Please demonstrate any benefits to low-income ratepayers in the Commonwealth and describe how the project minimizes and mitigates, to the extent feasible, ratepayer impacts. Benefits to low-income ratepayers may include, but are not limited to, projects that reduce the energy burden for low-income ratepayers through energy efficiency or renewable energy upgrades; direct funding of rate relief through grant programs, support of existing community programs or other funding opportunities. Describe the impact, if any, those benefits will have on the cost of the project.

In addition to the broad ratepayer benefits created by Bear Swamp's operation, Bear Swamp commits to providing an annual contribution of [REDACTED] to [REDACTED], or a similar and/or successor organization serving low-income Massachusetts residents. The annual contribution would begin in the first contract year, with payments occurring for the duration of the contract term. [REDACTED]

The contribution will be restricted specifically to energy assistance programs to support low-income ratepayers, many of which are anticipated to be located in Environmental Justice communities. This commitment would reflect an ongoing incremental annual cost to Bear Swamp. Bear Swamp further commits to reporting and recordkeeping related to tracking the annual fund disbursement.

While the annual contribution described above provides a direct and measurable benefit to low-income Massachusetts households, Bear Swamp also delivers broader affordability benefits through its operation within the New England electric system. As an existing, operating pumped-storage facility, Bear Swamp helps reduce system costs, improve reliability, and avoid the need for more costly new infrastructure investments, producing benefits that accrue to all ratepayers across the Commonwealth.

Bear Swamp Reservoir provides significant ratepayer benefits in the Commonwealth by lowering system costs, particularly during peak demand periods when energy is most expensive and fossil-fueled generators are typically on the margin. By storing energy during low-cost off-peak hours and delivering it back to the grid during peak hours, Bear Swamp effectively reduces wholesale market clearing prices. In addition, as described in a 2019 letter from ISO-NE to FERC, Bear Swamp provides critical reliability services to the New England electricity system that supports ongoing system operations (see: <https://www.iso->

[ne.com/static-](https://ne.com/static-assets/documents/2019/12/ltr_in_support_of_bear_swamp_relicensing.pdf)

[assets/documents/2019/12/ltr_in_support_of_bear_swamp_relicensing.pdf](https://ne.com/static-assets/documents/2019/12/ltr_in_support_of_bear_swamp_relicensing.pdf)). These benefits flow directly to all consumers, with proportionally greater benefits for low-income households, who are especially sensitive to fluctuations in energy costs.

Bear Swamp's long operating history also helps mitigate ratepayer risk. The facility has been safely and reliably operating for decades, is fully interconnected, and does not depend on future permitting, siting, or construction activities to deliver the benefits described herein. Moreover, incremental upgrades, such as equipment modernization, can improve efficiency at lower costs than new-build alternatives, further placing downward pressure on rates.

In this way, Bear Swamp both minimizes ratepayer impacts and enhances affordability for vulnerable customers by offering reliable, cost-effective mid-duration storage that stabilizes energy markets, reduces system peaks, and displaces higher-cost generation. Together with the direct funding commitment described above, these benefits provide both immediate and long-term support for low-income Massachusetts households and Environmental Justice communities.

14.7 Please describe benefits to transitioning fossil fuel communities, including how the community can be described as a fossil fuel community, including but not limited to hosting fossil fuel infrastructure such as fuel storage, delivery facilities, or fossil fuel generation facilities.

Bear Swamp is located in a rural region of the Commonwealth and is not itself situated within a community that hosts major fossil fuel generation infrastructure. However, the project provides important benefits to communities participating in the broader energy transition. By providing fast response energy storage and peak-balancing capacity, Bear Swamp reduces reliance on oil- and gas-fired peaking plants, supports integration of renewable energy, and enhances grid reliability throughout Massachusetts. As the Commonwealth continues to electrify end uses that have historically depended on fossil fuels, including home heating and transportation, the need for flexible energy storage resources will continue to grow. Bear Swamp helps facilitate this transition by storing energy when supply is abundant and delivering it during periods of high demand, reducing the need for additional fossil-fueled generation and supporting a cleaner electric grid.

In addition, while Bear Swamp is not located in a transitioning fossil fuel community, it is located in and adjacent to communities that have experienced the economic effects associated with the loss of major energy-sector infrastructure. As described in Sections 14.1 and 14.5, the project is located near the former Yankee Rowe Nuclear Power Station, which ceased commercial operations in the 1990s. As a result, the surrounding community has been affected by the presence and then loss of a substantial energy facility. Bear Swamp benefits the affected communities by providing employment opportunities and economic activity, along with the other benefits described herein.

14.8 Please provide a diversity, equity and inclusion plan that includes a Workforce Diversity Plan and the Supplier Diversity Program Plan as outlined in Section 2.2.2.13 of the

RFP.

Bear Swamp Power Company LLC Workforce Diversity Plan and Supplier Diversity Program Plan is included in Folder 14 General.

14.9 Please describe the strategy and mechanisms to track and report on any applicable commitments, including progress in achieving promised employment and economic benefits and the goals in the diversity, equity and inclusion plan, based on the template provided in the Form MOU with DOER and any other supplemental plans for tracking and reporting.

Brookfield actively tracks employee demographics through the use of its Human Resource Information System (HRIS), enabling us to monitor makeup of and changes in our workforce. On an annual basis, Brookfield can utilize HRIS data for submittal to track status and progress on the goals outlined in this RFP and described in 14.8.

14.10 Please provide a marked version of the Form MOU with DOER for this solicitation showing any specific proposed changes to the Form MOU. Bidders are discouraged from proposing any material changes or conditions to the Form MOU and any such changes will be considered in the Stage Two Qualitative Evaluation.

Bear Swamp understands the commitments embedded in the MOU to be limited to the Bear Swamp facility, specifically, and employees that are committed to the Project for 50% of their hours worked or more, and does not extend to broader affiliates within the Brookfield and Emera corporate structures. As such, Bear Swamp has no requested changes to the form – recognizing, however, that its status as an existing facility may result in certain commitments and related reporting requirements not being applicable (for example, reporting related to project siting and construction).

14.11 Please propose a strategy plan to track and report on the status of environmental justice impacts, and engagement and employment (training, recruitment and hiring goals) opportunities, based on the template provided in the Form MOU with DOER and any other supplemental plans for tracking and reporting.

Brookfield will utilize its HRIS platform for tracking employee data and will rely on the Commonwealth's Environmental Justice maps to determine applicable information relevant for annual submittals. Brookfield will also seek to implement measures under the future CBA to support accurate reporting. Finally, Bear Swamp will work with its vendors to support contractor-related employee reporting annually.

14.12 Please describe experience with stakeholder engagement showing demonstrated past and current productive relationships with environmental, commercial and residential stakeholders, federally recognized and state acknowledged tribes, Environmental Justice, and track record of avoiding, minimizing, and mitigating environmental, tribal, environmental

justice, and onshore impacts from projects similar to the proposed project.

Brookfield Renewable, through its stewardship of Bear Swamp, has consistently demonstrated a proactive and inclusive approach to stakeholder engagement. Our track record reflects meaningful, long-term relationships with a diverse array of stakeholders.

Our engagement includes regular updates, joint monitoring initiatives, and collaborative planning around recreational access.

Tribal Consultation and Inclusion - Brookfield has a history of respectful and transparent engagement with tribal communities. Notably, Bear Swamp initiated early consultations with tribal representatives during the recent Federal Energy Regulatory Commission relicensing process. These consultations ensured that the project's continued operation avoided adversely affecting culturally significant areas.

Environmental, Commercial, and Residential Stakeholders, including Environmental Justice communities - For commercial outfitters, private paddlers, and anglers, we host annual planning meetings and maintain open lines of communication to address concerns related to recreational flows downstream of our facility in the Deerfield River. We also provide information on short-term and long-term scheduled flows on our Safe Waters website (see: <https://safewaters.com/facility/fife-brook>) to facilitate both their planning and safe use of the river. Additionally, we maintain an email address (inquiriesMA@brookfieldrenewable.com) which is available for members of the public to contact the company with questions about project operations and river conditions. Bear Swamp supports ongoing recreational activities that benefit the surrounding communities, as described in 14.5, maximizing the benefits to its host communities and adjacent communities, including the associated Environmental Justice populations.

Regulatory Reporting - Brookfield Renewable maintains a disciplined and transparent approach to environmental and compliance-related reporting, rooted in its commitment to integrity, safety, and continuous improvement. We maintain and manage a robust Health, Safety, and Security, and Environment program that ensures all operations adhere to Brookfield's policies and industry best practices. This program includes periodic audits, gap analyses, and action plans developed by local management teams to address findings and track progress.

Brookfield emphasizes incident transparency, requiring that deviations—even those of short duration—be reported to resource agencies and documented in filings to FERC. These reports include detailed timelines, operational data, agency feedback, and corrective actions to prevent recurrence.

The company also fosters a culture of ethical accountability through its Ethics Reporting Line, a confidential and anonymous platform managed by an independent third party. Employees are encouraged to report any concerns related to environmental violations, safety risks, or unethical behavior without fear of retaliation.

Bear Swamp has decades of experience working with its host communities and has an established record of responsible environmental stewardship and community partner. Under its new license, Bear Swamp anticipates providing additional community and recreational support.

14.13 Please describe extent to which the project demonstrates that it avoids, minimizes, or mitigates, to the maximum extent practicable, environmental impacts. Preliminary characterization of the potential environmental impacts facility and other infrastructure from pre-construction through the duration of the project,

Bear Swamp was constructed in the 1970s and has been in safe, reliable operation for decades. As an existing facility, it does not require new greenfield development, large-scale construction, or additional land disturbance. This means its incremental environmental footprint is negligible compared to new infrastructure projects.

By continuing operations, Bear Swamp helps Massachusetts avoid siting and building new resources elsewhere, which would entail permitting, community, and ecological impacts. The project provides critical peak-hour reliability and clean energy integration services by storing excess renewable energy and displacing fossil generation during periods of high demand. In this way, Bear Swamp not only minimizes direct local environmental impacts but also contributes system-wide to reduced emissions and a cleaner energy mix, all while adhering to environmental compliance commitments specific to its FERC license, Water Quality Certification and other permits (including minimizing impacts during the process to complete the capacity upgrades at Unit 1 and Unit 2).

14.14 Please describe extent to which the project demonstrates that it avoids, minimizes, or mitigates, to the maximum extent practicable, negative impacts on Environmental Justice populations and host communities, and extent to which the project directs positive benefits from the project to those communities.

Bear Swamp demonstrates a strong commitment to avoiding, minimizing, and mitigating impacts on Environmental Justice population or host communities because it is an existing facility that has operated since the 1970s. No new construction, major land disturbance, greenfield development, or transmission construction are required to support the project. As a result, Bear Swamp avoids many of the siting, construction, land use, traffic, noise, and other impacts that can disproportionately affect EJ populations and host communities.

Rather than creating new burdens on EJ populations and host communities, Bear Swamp provides direct and measurable benefits to those communities. The facility contributes to the local tax base, supports family-sustaining jobs in operations and maintenance, provides recreational opportunities, and generate long-term economic activity in the region. The facility pays property taxes to the communities of Florida, Rowe and Charlemont — the latter two of which are identified as Environmental Justice communities based on income. During the 2023-2025 property tax years, Bear Swamp Power Company has contributed \$5.26 million, \$11.08 million, and approximately \$4,000 in taxes, respectively, in tax payments to these communities associated with project lands and facilities. In addition,

Bear Swamp supports recreation and tourism activity throughout the Deerfield River corridor, including communities identified as Environmental Justice populations.

Bear Swamp also directs positive benefits to Environmental Justice populations through community investment and charitable giving. As described elsewhere in this proposal, Bear Swamp commits to providing an annual contribution of [REDACTED] support low-income energy assistance initiatives serving Massachusetts residents, including residents of Environmental Justice communities. The company further maintains a long-standing charitable giving program focused on local community needs, including support for food security, housing assistance, health services, education, environmental stewardship, youth programming, disaster relief, and community-based nonprofit organizations.

The project's new FERC license provides additional long-term community benefits through expanded recreation facilities and public-access improvements along the Deerfield River. Planned investments include new recreational access sites, expanded parking, additional seasonal restroom facilities, a changing facility, and improved river access infrastructure. These improvements will enhance public access to outdoor recreation and support local economic activity in host communities and nearby Environmental Justice communities.

Finally, Bear Swamp contributes to broader environmental and public-health objectives that benefit communities throughout Massachusetts. By providing energy storage, peak balancing capability, and critical reliability services, the facility supports greater renewable energy integration and reduces reliance on fossil-fueled generation during periods of high demand. In this manner, Bear Swamp enhances system reliability and enables greater integration of clean energy during peak demand periods, which in turn reduces reliance on fossil generation. This helps improve regional air quality and supports Massachusetts' decarbonization goals.

Section A-15: Exception to Form Long-Term Contract

For Transmission Projects, please attach an explanation of any exceptions to the Form Long Term Contract set forth in Appendices B-1 and B-2. Comments to the proposed Form Long-Term Contract must include any specific alternative provisions in a redline format to the Form Long-Term Contract. If the bidder is proposing a phased project with each phase covered by a separate contract, the bidder should provide separate contracts for each phase with specific alternative provisions to the Form PPA in redline format.

Bidders are discouraged from proposing material changes to the Form Long-Term Contract. As provided in Section 2.2.5, the Distribution Companies reserve the right to reject certain mark-ups that add additional cost or risk. Selection of a project does not mean acceptance of the Bidder's mark-ups as bid.

Bidders of Distribution Projects may not change the Form Long-Term Contract.

Form contracts are attached in Folder 15. Specifically, Bear Swamp anticipates minimal contract changes largely limited to the operational status of the facility (i.e., not a facility under development). As described in this submittal, Bear Swamp is an existing storage resource partially eligible (87.76MW) to generate CPECs based upon previously-approved CPS capacity (J. Cockwell 1 and J. Cockwell 2) and DOER's approved process for establishing CPEC minting (see A-2).