

**SECTION 83E ROUND 2
REQUEST FOR PROPOSAL
APPLICATION FORM**

SEA BREEZE ENERGY STORAGE



SEA BREEZE
ENERGY STORAGE

Proposal Created by:



Applicant

Sea Breeze Energy Storage, LLC

Address

800 Taylor St, Suite 200
Durham, North Carolina 27701

Contact



Proposal Created for:

Massachusetts Department of Energy
Resources

Electric Distribution Companies

Fitchburg Gas & Electric Light Company
d/b/a Unitil

Massachusetts Electric Company and
Nantucket Electric Company, each d/b/a
National Grid

NSTAR Electric Company d/b/a Eversource
Energy



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1 Certification, Project, and Pricing Data

1.1 CPPD

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.

The Certification, Project and Pricing Data (CPPD) form for the Sea Breeze Energy Storage Project is provided as Attachment 1-1.

2 Executive Summary of the Proposal

2.1 Executive Summary

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.

Sea Breeze Energy Storage, LLC (the “Company”), [REDACTED] is pleased to present this comprehensive proposal in response to the Section 83E Round 2 procurement undertaken by the Massachusetts Department of Energy Resources (DOER) in coordination with the Electric Distribution Companies (EDCs), Unitil, Eversource, and National Grid,¹ as referenced in the *Request for Proposals for Long-Term Contracts for Energy Storage Projects Round 2* dated July 31, 2026 (“Section 83E Round 2 RFP”). This proposal is for a single Transmission Project,² the Sea Breeze Energy Storage Project (the “Project”). Selecting the Project in this Section 83E Round 2 procurement would be a major step for Massachusetts towards meeting its statutory mandate to procure 3,500 megawatts (MW) of mid-duration energy storage by 2030. The Project’s position [REDACTED] not only strengthens grid reliability and advances consumer cost savings, but also greatly advances the state’s climate and energy goals.

The Project includes a [REDACTED] Battery Energy Storage System (BESS), Project Substation, and related Interconnection Facilities, to be constructed [REDACTED]

The Project has secured an interconnection queue position [REDACTED] with ISO New England (ISO-NE) and participated in the Transitional Cluster Study (TCS) process, with Large Generator Interconnection Agreement (LGIA) execution expected in [REDACTED]. Participation in this TCS process enhances transparency and cost certainty regarding network upgrades, substantially mitigating interconnection risks compared to standalone studies. [REDACTED]

[REDACTED] The Project is designed to

¹ Fitchburg Gas & Electric Light Company d/b/a Unitil (Unitil); Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (National Grid); and NSTAR Electric Company d/b/a Eversource Energy (Eversource).

² “Transmission Project” means a proposed Energy Storage System that interconnects into the Pool Transmission Facilities (PTF) administered by ISO-NE at or above 69 kilovolts (kV).

provide ISO-NE with capacity, regulation, reserves, and Clean Peak Energy Certificates (CPECs), supporting Massachusetts’s goal for grid reliability and clean energy advancement.

The Project [REDACTED] in ISO-NE’s current TCS cluster.

[REDACTED]

[REDACTED]

[REDACTED]

3 [REDACTED]

4 [REDACTED]

Strata Clean Energy brings a proven track record of success, having developed, permitted, financed, and delivered multiple large-scale clean energy projects across the United States (US), including within several major Regional Transmission Organization (RTO)/Independent System Operator (ISO) markets. Portfolio highlights include three contracted BESS projects with Arizona Public Service (APS). Scatter Wash Energy Storage (255 MW/1,020 MWh) and Justice Energy Storage (150 MW/600 MWh) achieved COD in 2025 and 2026, respectively. White Tank Energy Storage (100 MW/400 MWh) is expected to reach COD in 2027. [REDACTED]

[REDACTED] Further details on the above projects and additional Strata projects are provided in Sections 5 and 13. As a company with an engineering, procurement, and construction (EPC) arm, Strata is hyper focused on execution certainty, with project delivery on time and on budget.

Strata’s development approach emphasizes minimizing environmental impacts throughout the project lifecycle—from site selection and construction to operation and decommissioning. The Project has been thoughtfully sited to avoid and minimize the Project’s potential impacts on the environment and surrounding community, including avoiding direct impacts to wetlands, waterbodies, and other sensitive environmental resources to the maximum extent practicable (see Section 7.5). In Section 14, the Company has identified numerous measures to further avoid, minimize, and mitigate potential Project impacts, which will be refined in consultation with the [REDACTED] state, regional, and local agencies, key stakeholders, and the community during the Project’s permitting process.

Strata is also committed to delivering meaningful economic benefits to the region, including temporary local jobs and new tax revenue during construction, and energy security and reliability with long-term operations. [REDACTED]

[REDACTED]

[REDACTED] the Project is exactly the kind of BESS envisioned when the 83E procurement was released—its contract will guarantee a higher renewable load percentage across [REDACTED] area during peak hours.

Table 2-1 summarizes key details of the Project proposal.

Table 2-1 Sea Breeze Energy Storage Proposal Summary

Key Project Item	Details
Project Name	Sea Breeze Energy Storage
Capacity (MW)	[REDACTED]
Duration (hours)	[REDACTED]
Projected Annual Avg. CPECs	[REDACTED]
Proposed Energy Storage Technology	[REDACTED]
COD	[REDACTED]
Pricing (\$/CPEC)	[REDACTED]
Contract Term	[REDACTED]
Interconnection Location	[REDACTED]
Interconnection Schedule	ISO-NE queue position secured; participated in the TCS process with LGIA execution expected in [REDACTED]
Project Location	[REDACTED]
Bidder/Applicant	Sea Breeze Energy Storage, LLC [REDACTED]

Table 2-2 summarizes the Project’s key milestones. Please see Section 10, including Attachment 10-1, for further details.

Table 2-2 Key Project Milestones

Key Project Milestone	Target Date
Site Control Complete	Completed
LGIA Signed	[REDACTED]
[REDACTED]	[REDACTED]
Long Lead Time Equipment Procurement	[REDACTED]
Permitting Complete	[REDACTED]
Financial Close	[REDACTED]
Notice to Proceed (NTP)	[REDACTED]
COD	[REDACTED]

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

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

- i. Identify if New or Existing Facility, or an upgrade to Existing Facility:

The Sea Breeze Energy Storage Project (the “Project”) is a New Facility.

- ii. Technology Type (e.g., mechanical, chemical, thermal):

Chemical

- iii. Technology Description (e.g., battery chemistry, thermal storage medium):

Lithium Iron Phosphate (LFP) lithium-ion batteries

- iv. Point of Interconnection Deliverability Restrictions (if any):

None

- v. Nameplate MW AC (at 100% project completion):

[REDACTED]

- vi. Net Contract MW AC (at 100% project completion):

[REDACTED]

- vii. Charge rate (MW):

[REDACTED]

- viii. Discharge rate (MW):

[REDACTED]

- ix. Storage Energy (MWh):

[REDACTED]

- x. Discharge Duration at Full-Rated Capacity (hours):

[REDACTED]

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.:*

100% Depth of Discharge of the Storage Energy. Preheating is required at 20 degrees Celsius (°C) and below.

xv. *Max/Min cycles per year, season, and per day:*

Maximum of 365 cycles per year. Maximum of one cycle per day in all seasons.

3.2 Energy Storage System Operation

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.

The Project will discharge at full power [REDACTED]. It can also discharge at lower power for longer durations until it has completed a full discharge of the Storage Energy. It can also be partially charged and discharged throughout the day up to a cumulative amount of discharged energy corresponding to the Storage Energy, equivalent to one cycle per day. The Project is capable of ramp rates exceeding the full Nameplate MW AC per minute.

The Project [REDACTED] and will also participate in ISO New England (ISO-NE) market operations, including performing energy arbitrage and providing ancillary services such as spinning reserves, regulation up, and regulation down. The Project will meet all operational commitments within Interconnecting Transmission Owner (ITO) (i.e., Eversource) and ISO-NE parameters.

3.3 Energy Storage System Location

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

i. *The anticipated interconnection point*

[REDACTED]

[REDACTED]

- 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*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 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.)*

[REDACTED]

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

[REDACTED]

- 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*

Sea Breeze Energy Storage, LLC (the “Company”) strategically located the Energy Storage Site to maximize grid benefits, minimize total interconnection costs, and avoid and minimize the Project’s potential impacts on the environment and surrounding communities.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.4 Proposed Technology

Describe the proposed technology and equipment manufacturer by name and model (include inverter characteristics if applicable).

[REDACTED]

3.5 Technology Reliability

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.

[REDACTED]

3.6 Environmental Attribute Delivery Plan

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.

Please see the Certification, Project and Pricing Data (CPPD) form, Part V provided as Attachment 1-1 for the Project's planned charge/discharge profile. The Project is a Qualified Energy Storage System operating primarily to store and discharge renewable energy by charging coincident with

periods of typically high renewable energy as a percent of the grid generation mix as defined in Section 21.05 of 225 CMR 21.00. [REDACTED]

[REDACTED] The Project will operate as a Continuous Storage Facility and will participate in the Day-Ahead and Real-Time Energy Markets, the Forward Capacity Market, and the Ancillary Services Market.

3.7 Qualified Energy Storage System

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 colocation 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.

As described in Section 3.6, as a Qualified Energy Storage System, the Project will charge during periods of typically high renewable energy production as a percent of the grid generation mix as defined in Section 21.05 of 225 CMR 21.00. The Project will also discharge during the Seasonal Peak Periods of the Clean Peak Seasons as defined in Section 21.05 of 225 CMR 21.00.

3.8 Revenue Streams

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.

The Project is a New Facility and intends to generate revenue from the following:

1. CPEC sales via Long-Term Contracts (LTCs) with Electric Distribution Companies (EDCs)

[REDACTED]

2. Wholesale revenues via Day-Ahead and Real Time energy markets and ancillary services
3. ISO-NE Forward Capacity Market contracts

3.9 Maintenance Outage Requirements

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).

Minimal planned outages are required for maintenance. Inspections will be done annually, and associated maintenance and component replacements will be done as needed.

[REDACTED]

[REDACTED]

[REDACTED]

3.10 Operating Constraints

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).

Up to 365 charge/discharge cycles per year. Up to one cycle per day. Up to 100% Depth of Discharge of the Storage Energy. Preheating is required at 20 °C and below.

3.11 Degradation Mitigation Plan

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).

[REDACTED]

4 Environmental Attribute Delivery Plan

4.1 Environmental Attributes

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.

The Sea Breeze Energy Storage Project (the "Project") will deliver GIS Certificates representing Clean Peak Energy Certificates (CPECs) into the Electric Distribution Companies' (EDC's) New England Power Pool (NEPOOL) Generation Information System (GIS) accounts. The Project will ensure that the transfer of all GIS Certificates will be authorized under the current ISO New England (ISO-NE) GIS rules and protocols. Specifically, the Project will submit a Statement of Qualification Application to the Massachusetts Department of Energy Resources (DOER) to become a Clean Peak Resource. Pursuant to Section 4.5(e) of the Form of Long-Term Contract set forth in Appendices B-1 and B-2 of the Section 83E Round 2 Request for Proposals (RFP), the Project will deposit all GIS Certificates into the GIS account designated by the Buyer with: (i) the Buyer as the initial owner, or (ii) via a Forward Certificate Transfer. No rule or protocol change is expected to be required to transfer all GIS Certificates.

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 Long-Term Contracts for Financing

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.

The Sea Breeze Energy Storage Project (the “Project”) is a New Facility. A Long-Term Contract (LTC) from this Section 83E Round 2 Request for Proposals (RFP) process is necessary to enable Project financing and thus the construction and operations of the Project. The long-term tenor and investment grade ratings of the Electric Distribution Companies (EDCs) provide guarantees regarding contracted revenue that project finance banks and tax equity providers require to underwrite financing facilities. The alternative of merchant Clean Peak Energy Certificate (CPEC) sales introduces significant price and volume uncertainty that would likely imperil the willingness of financing counterparties to engage. [REDACTED] (“Strata” or “Strata Clean Energy”) has had conversations with longstanding relationship lenders and tax equity providers and has received feedback that a LTC is critical for funding the Project.

5.2 Business Entity Structure

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.

Sea Breeze Energy Storage, LLC (the “Company”) is a manager-managed limited liability company and an indirect subsidiary of [REDACTED]

The legal ownership and organizational structure of Sea Breeze Energy Storage, LLC is further illustrated in Attachment 13-1 (Legal Organization Chart). The Project team and management structure are illustrated in Attachment 13-2 (Team Organizational Chart). Strata’s balance sheet capital provides funding during Project development.

5.3 Financing Plan

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 expected to be financed with debt, tax equity, and equity from Strata. The debt facility is expected to be a construction-to-term loan accompanied by working capital/letter of credit (LC) facility for any Project credit support, including LTC LCs, Interconnection LCs, etc. Key relationship banks with which Strata has long-standing relationships and that have been used on past financings include:

[REDACTED]

Strata has successfully financed multiple projects, as further described in Section 5.6, under a similar strategy and structure. [REDACTED]

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

Not applicable.

- iii. Expected sources of debt and equity financing.*

The Project's equity financing funding source is expected to be Strata's balance sheet and corporate debt facilities. [REDACTED]

As described in Section 5.3.i, the debt financing funding source is expected to be a construction-to-term loan accompanied by working capital/LC facility for any Project credit support. Sources for debt are likely to be Strata's relationship banks [REDACTED]

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

[REDACTED]

[REDACTED]

v. *The projected capital structure.*

The Project’s projected capital structure is summarized in Table 5-1.

Table 5-1 Capital Structure

Funding Source	Dollar Value of the Project for the Funding Source	Percentage Value of the Project for the Funding Source	Counterparties
Project Finance (i.e., construction loan)	[REDACTED]	[REDACTED]	[REDACTED]
Developer/Parent Contribution	[REDACTED]	[REDACTED]	[REDACTED]
Monetize Via Tax Equity Investors	[REDACTED]	[REDACTED]	[REDACTED]

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.*

Not applicable.

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.*

Pre-Notice to Proceed (NTP) development capital, which covers development and permitting costs, will be provided via Strata’s balance sheet and corporate debt facilities. [REDACTED]

[REDACTED] which provides Strata the ability to issue LCs from a bank that is rated A- or better. [REDACTED]

[REDACTED]

Strata has had preliminary conversations with existing debt and tax equity partners regarding the financing timeline of the Project. [REDACTED]

5.4 Long-Term Revenue Commitments

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.

The Project does not currently have 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.

5.5 Offtaker Commitment Status

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.

The Project does not have any commitments with any offtakers.

5.6 Financing Experience

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:

Supported by long-standing relationships (many 10+ years) with leading banks, lenders, and tax equity investors, Strata has raised over [REDACTED] in total debt and [REDACTED] in tax equity and has executed [REDACTED] tax equity transactions. The projects outlined below are four recent representative projects that highlight Strata's financing experience.

i. Project name and location

- a. Justice Energy Storage, Maricopa County, Arizona (AZ)
- b. Scatter Wash Energy Storage, Maricopa County, AZ
- c. Poblano Energy Storage, Rialto, California (CA)
- d. [REDACTED]

ii. Project type and size

[REDACTED]

[REDACTED]

[REDACTED]

iii. Date of construction and permanent financing

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

iv. Form of debt and equity financing

[REDACTED]

[REDACTED]

v. *Current status of the project*

- a. Justice Energy Storage achieved COD in 2026 and is currently operational.
- b. Scatter Wash Energy Storage achieved COD in 2025 and is currently operational.
- c. Poblano Energy Storage achieved COD in 2024 and is currently operational.

[REDACTED]

5.7 Financial Resources and Strength

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.

Strata has raised over [REDACTED] in total debt and [REDACTED] in tax equity across [REDACTED] tax equity transactions, providing full-spectrum capital including development capital, construction and term debt, tax equity, back-leverage, and refinancing. [REDACTED] Strata applies conservative leverage and disciplined underwriting built to endure market cycles.

[REDACTED] These facilities also enable Strata to issue LCs from a bank rated A- or better, satisfying credit support obligations under the resulting LTC, Large Generator Interconnection Agreement (LGIA), and other Project agreements.

This capital base of Strata's balance sheet and corporate debt facilities funds all pre-NTP development and permitting costs for the Project from Strata's own resources. [REDACTED]

[REDACTED] Strata has funded sponsor equity from these sources for each of the projects described in Section 5.6 [REDACTED]

[REDACTED]

[REDACTED] The Project budget includes contingency allowances for construction activities, development expenditures, and O&M. The Project budget and capital structure have been designed to provide sufficient financial flexibility to manage and absorb potential adverse scenarios,

including unforeseen construction and commissioning delays, labor and material cost escalation, supply chain disruptions, scope refinements, and other Project-related cost overruns. [REDACTED]

5.7.1 *Financing Relationships Supporting Construction*

[REDACTED]

The Project's capital plan is therefore not dependent on any single counterparty or structure [REDACTED]

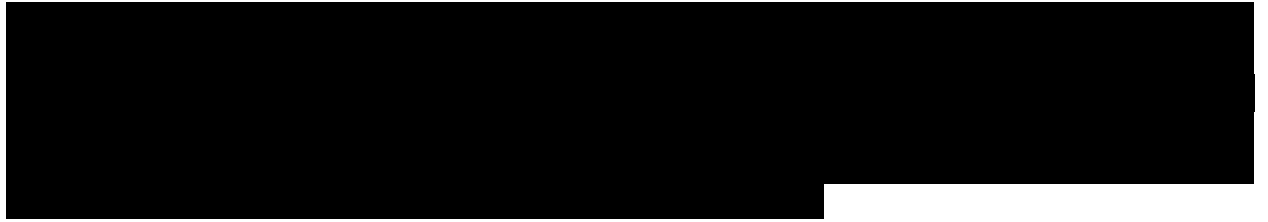
Strata has held preliminary conversations with existing debt and tax equity partners regarding the Project's financing timeline. Construction-phase cost and schedule risk are further addressed through:

- [REDACTED]
- Contingency incorporated throughout the Project budget and financing plan to provide capacity for potential cost increases, schedule delays, and other unforeseen project risks. [REDACTED]
- Updated major equipment and EPC quotes, allowing for validated cost and schedule estimates. [REDACTED]
- [REDACTED]

5.7.2 *Operations, Maintenance, and Third-Party Relationships*

[REDACTED]

Strata generally operates its assets through its own in-house asset management and O&M business, which manages 3.7 gigawatts (GW) of operating solar and storage across 280 projects [REDACTED]. Because development, engineering, construction, financing, and operations sit within a single organization, the party underwriting the Project's performance assumptions is the same party delivering against them over the contract term.



5.8 Prior Financial Difficulties

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.

Not applicable.

5.9 Cost & Revenue Assumptions

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.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.10 Financial Statements & Ratings

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.

The most recent three years of audited financial statements for [REDACTED] are provided as Attachment 5-1. [REDACTED]

5.11 Directors & Officers List

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.

[REDACTED]

5.12 Security Provision Ability

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.

[REDACTED]

5.13 Credit Issues & Downgrades

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.

Not applicable.

5.14 ITC & Tax Incentives

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.

The role of the Federal Investment Tax Credit (ITC) in the financing of the Project is described below. The Project’s financing does not rely on any state tax credits or other subsidies, incentives, grants, or awards.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.15 Recent Litigation Disclosure

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]

5.16 Operating Life & Depreciation

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?

The expected operating life of the Project is 20 years [REDACTED]

[REDACTED]

5.17 Financing Status

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 has not obtained financing or a financing commitment.

As described in Section 5.1, an LTC is a contracted revenue stream that allows project finance lenders to improve their terms

5.18 Existing Product Agreements

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.

No agreements with respect to energy, CPECs, and/or capacity have been executed for the Project. No proposals have been submitted to other buyers.

5.19 Affiliated Energy Entities

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

Sea Breeze Energy Storage, LLC is an entity within the Strata Clean Energy organization

5.20 Bankruptcy & Insolvency History

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?

Not applicable.

5.21 Conflicts of Interest

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

Not applicable.

5.22 Project Litigation & Violations

Please 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.

Sea Breeze Energy Storage, LLC and its affiliates do not have energy storage projects involved in litigation, [REDACTED]

5.23 Prior COD Failures

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.

[REDACTED]

5.24 Litigation Against Companies

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.

Not applicable.

5.25 Energy Product Disputes

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.

See Section 5.15.

5.26 Investigation & Debarment

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).

Sea Breeze Energy Storage, LLC is not under investigation, convicted, or found liable for acts in any jurisdiction involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or the subject of any debarment action. [REDACTED]

5.27 Required Regulatory Approvals

Identify all regulatory and other approvals needed by bidder to execute a binding sale agreement.

[REDACTED]

5.28 FERC Compliance

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.

The Project will interconnect to the New England Transmission System under ISO-NE's Federal Energy Regulatory Commission (FERC)-jurisdictional Open Access Transmission Tariff (OATT), pursuant to Schedule 22 (Large Generator Interconnection Procedures [LGIP]) and the pro forma LGIA on file with FERC. Because the Project's interconnection is governed by FERC-approved tariff provisions applied uniformly to all similarly situated interconnection customers, the Project's approach is inherently consistent with FERC precedent and ratemaking principles in each of the areas identified below.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.29 Distribution Company Affiliations

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*

Not applicable.

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 Interconnection Request Evidence

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.

The Sea Breeze Energy Storage Project (the “Project”) [REDACTED] in ISO New England’s (ISO-NE’s) current Transitional Cluster Study (TCS) cluster.

The Company has demonstrated that the Project meets a level of commitment to interconnect consistent with both Capacity Network Resource Interconnection Service (CNRIS) and the Capacity Capability Interconnection Standard (CCIS) through the following actions:

Interconnection Request and Queue Position: The Company submitted an Interconnection Request for CNRIS to ISO-NE for the Project on May 28, 2024, and was allocated queue position (QP) [REDACTED]. The [REDACTED]

- **Continued Progression Through the Interconnection Queue:** The Project has continued to advance through ISO-NE's interconnection queue process, as reflected in ISO-NE's most recent final TCS study results for the Project, provided as Attachment 6-3.

6.2 Interconnection Studies & Reliability

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.

Interconnection Studies & Reliability

The Project has completed ISO-NE's TCS process under Schedules 22, 23, and 25 of the ISO-NE Open Access Transmission Tariff (OATT) and Planning Procedure PP5-6. The Company received the interim TCS results and subsequently received the Final TCS Report from ISO-NE, issued August 6, 2026. [REDACTED]

Interconnection Service Type/CCIS Conformance

The Project has been studied for and will receive CNRIS, ISO-NE's interconnection service under the CCIS. [REDACTED]

System Performance and Reliability Findings

[REDACTED]

[REDACTED]

[REDACTED]

Interconnection Costs

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- i. *Copy of completed I.3.9 approval or I.3.9-equivalent study attached. ☒ If none, please explain:*

ISO-NE treats the Final TCS Report as the I.3.9-equivalent study for projects proceeding through the TCS process, as it reflects ISO-NE's completed technical review and determination of the Network Upgrades, cost allocation, and reliability findings required for the Project's interconnection at the CCIS. [REDACTED]

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

A copy of the completed CCIS-equivalent study is attached; the Final TCS Report (see Attachment 6-3) constitutes the CCIS-equivalent study [REDACTED]

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

[REDACTED]

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

Not applicable.

6.3 Multiple Active Requests

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.

Not applicable. [REDACTED]

6.4 Network Upgrade Costs

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.

[REDACTED]

6.5 Power Flow Models

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:*

Power flow modeling data are provided in Attachment 6-6.

6.6 One-Line Diagram

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:*

An electrical one-line diagram is provided as Attachment 6-7.

6.7 Interconnection Facilities

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6.8 Curtailment & Voluntary Upgrades

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.

The Project has been studied for and will receive CNRIS under the CCIS.

[REDACTED]

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 Site Plan and Maps

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:

Yes, plans and maps of the Sea Breeze Energy Storage Project (the “Project”) are included as Attachments 7-1 and 7-2.

The Project includes a Battery Energy Storage System (BESS), [REDACTED] Project Substation, and related Interconnection Facilities, [REDACTED]

The Project’s site layout plan has undergone numerous iterations to avoid and minimize the Project’s potential impacts on the environment and surrounding neighborhoods (see Section 7.5). An overview map that clearly identifies the location of the proposed Project Site is provided as Figure 7-1 of Attachment 7-1. Figure 7-2 of Attachment 7-1 depicts the BESS location, the Project Substation, the related Interconnection Facilities and POI,¹ the total acreage for the Energy Storage Site, and the deployment facilities.² Figure 7-3 of Attachment 7-1 illustrates the relationship of the Project Site to other local infrastructure, including transmission and distribution facilities, roadways, and

1

2

[REDACTED]

[REDACTED]

waterways, as well as other environmental constraints. The Project Site and surrounding area are further described in Section 7.5.

The current site layout plan, which illustrates the location of all major equipment and facilities, is provided as Attachment 7-2.

7.2 Real Property Rights

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.

Yes, as described below.

- ii. *If so, please detail the bidder's rights to control the Energy Storage System site and interconnection locations.*

[REDACTED]

- 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.*

The status and plan for acquiring real property rights are described above and incorporated into the Project schedule provided as Attachment 10-1.

- iv. *Identify any joint use of existing or proposed real property rights.*

[REDACTED]

[REDACTED]

[REDACTED]

- 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).*

[REDACTED]

7.3 Zoning and Permitting

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.

7.3.1 Permitting

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The Project’s permitting plan and timeline are further discussed in Section 7.8.

7.3.2 Zoning

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7.4 Overall Permitting Plan and Timeline

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

The Company has developed a prudent permitting schedule to ensure on-time delivery of the Project. The Company’s permitting activities are supported by environmental consultants with the experience and expertise required to successfully permit BESS projects [REDACTED] (see Section 13).

The overall permitting timeline is shown in Table 7-1. The current status and anticipated timeline for seeking each required permit/approval is provided in Table 7-2. The process to obtain each permit/approval is discussed in Section 7.8. The Project’s permitting schedule is further discussed in Section 10 and incorporated into the Project schedule provided as Attachment 10-1.

Table 7-1 [REDACTED]

[REDACTED]

7.5 Description of the Surrounding Area

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.

[REDACTED]

[REDACTED]

As mentioned previously, the Project's site layout plan has undergone several iterations to avoid and minimize the Project's potential impacts on the environment and surrounding community. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Overall, the Project is compatible with surrounding land uses [REDACTED]

[REDACTED]

A description of the local zoning is provided in Section 7.3.

7.6 Site Control for Interconnection Facilities

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

[REDACTED]

7.7 List of Permits, Licenses, and Environmental Assessments Required

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.

[REDACTED]

Table 7-2 below summarizes the state, regional, and local permits/approvals [REDACTED] as well as the federal permits required for the Project. Required agency reviews are also listed in Table 7-2. Each permit, approval, and agency review is described further in Section 7.8.

Table 7-2 Required Permits, Approvals, and Reviews

Agency	Permit/Approval/Review	Status
State		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Massachusetts Historical Commission (MHC)	MHC Review [REDACTED]	[REDACTED]
Regional		
[REDACTED]	[REDACTED]	[REDACTED]
Local Non-Ministerial Permits		
[REDACTED]	[REDACTED]	[REDACTED]
Local Ministerial Permits		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Table 7-2 Required Permits, Approvals, and Reviews (Continued)

Agency	Permit/Approval/Review	Status
Federal		
US Environmental Protection Agency (EPA)	National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) for Stormwater Discharges from Construction Activities	Anticipate filing the NOI at least ~45 days prior to the start of construction; coverage begins 14 days after NOI filing
Advisory Council on Historic Preservation (ACHP)/Lead federal agency	Consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA)	Addressed as part of the NPDES CGP NOI filing
US Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Service (NMFS)	Consultation under Section 7 of the Endangered Species Act (ESA)	Addressed as part of the NPDES CGP NOI filing
Federal Aviation Administration (FAA)	Determination of No Hazard to Air Navigation (required if the Project [including any cranes, lighting masts, etc.] exceeds 200 ft above ground level (AGL), is near an airport, or penetrates specific imaginary surfaces [as specified further at 14 CFR §77.9])	Notice of Construction or Alteration (Form FAA 7460-1) to be filed at least 45–60 days prior to construction (if needed)

Note:

7.8 Description of Permits, Licenses, and Environmental Assessments

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.

An overview of the Project’s permitting timeline is provided in Table 7-1, and major permitting milestones are included in the Project schedule detailed in Section 10. The current status and anticipated timeline for seeking each required permit/approval is provided in Table 7-2. A project approval assessment that describes, in narrative form, each segment of the permitting process is provided below.

7.8.1 State, Regional, and Local Permitting

7.8.1.1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7.8.1.2

7.8.1.3 Massachusetts Historical Commission Review

The Massachusetts Historical Commission (MHC) reviews any new construction, renovation, or demolition project that requires funding, licenses, permits, or approvals from any state or federal governmental agency. MHC's review process aims to reach agreement to avoid, minimize, or mitigate adverse effects on historic and archaeological properties.

[REDACTED]

7.8.1.4 [REDACTED]

[REDACTED]

7.8.1.5 [REDACTED]

[REDACTED]

[REDACTED]

7.8.1.6 Local Ministerial Permits

The Project requires Ministerial Permits (i.e., non-discretionary “by right” permits) from the Town.⁸

[REDACTED]

[REDACTED]

7.8.2 Federal Permitting

7.8.2.1 EPA NPDES Stormwater Construction General Permit

Projects in Massachusetts that result in the disturbance of one or more acres of land and have the potential to discharge stormwater to wetlands or other waters of the US require permit coverage for stormwater discharges under the EPA’s National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) for Stormwater Discharges from Construction Activities. As the Project is expected to disturb more than one acre of land, a NPDES CGP is expected to be required. To obtain coverage under the CGP, the Project must file an electronic NOI with EPA. Coverage begins 14 days after filing a complete NOI.

7.8.2.2 Section 106 Consultation

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects of federal “undertakings” (i.e., projects that are carried out, assisted, funded, permitted, licensed, or approved by a federal agency) on historic properties. If a federal or federally assisted project has the potential to affect historic properties that are listed, or are eligible for listing, in the National Register of Historic Places, a Section 106 review will take place. The only federal permit expected to be required for the Project is the NPDES CGP. Coverages of individual construction sites under the CGP do not constitute separate federal undertakings. However, Appendix E (Historic Property Screening Process) of the CGP will require a consideration of cultural resources and potential consultation with MHC and Native American Tribes.

⁸

[REDACTED]

7.8.2.3 Section 7 ESA Consultation

Under Section 7 of the federal Endangered Species Act (ESA), federal agencies must consult with the National Marine Fisheries Service (NMFS) and/or the US Fish and Wildlife Service (USFWS) when an action the agency carries out, funds, or authorizes (such as through a permit) may affect a federally listed endangered or threatened species and/or designated critical habitat. The purpose of the consultation is to assist the federal agency in meeting its duty to ensure that its action is not likely to jeopardize the continued existence of any federally listed species or destroy or adversely modify designated critical habitat. As described above, the only federal permit expected to be required for the Project is the NPDES CGP. Appendix D (Eligibility Worksheet Relating to Threatened and Endangered Species Protection) of the CGP outlines the process for documenting an applicant's eligibility criteria with respect to the protection of federally listed species and designated critical habitat under the ESA. While coordination with the USFWS and/or NMFS may not be required, EPA encourages applicants to coordinate with these agencies, to document that coordination, and to do so prior to submitting the NOI for the CGP.

7.8.2.4 FAA Notice of Construction or Alteration

If the Project (including any cranes, lighting masts, etc.) exceeds 200 ft above ground level (AGL), is near an airport, or penetrates specific imaginary surfaces (as specified further at 14 CFR § 77.9), the Project must submit a Notice of Construction or Alteration (Form FAA 7460-1) to the Federal Aviation Administration (FAA) to notify them of any proposed construction activities that could impact navigable airspace. Form FAA 7460-1 would be filed with the FAA at least 45 days prior to the start of construction. Once the FAA has completed an aeronautical study, the FAA will make a determination detailing the study's findings (e.g., a Determination of No Hazard to Air Navigation).

7.9 Track Record with Stakeholders and Reducing Impacts

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.

7.9.1 Past and Current Relationships with Stakeholders

Strata [REDACTED] ("Strata") has a proven track record of conducting inclusive outreach efforts for renewable energy projects throughout the country. Strata's general approach is to develop stakeholder engagement plans and strategies tailored to the uniqueness of each project location and then engage those stakeholder communities early to identify areas of concern and areas where the project team can work collaboratively with stakeholders to improve community acceptance of projects.

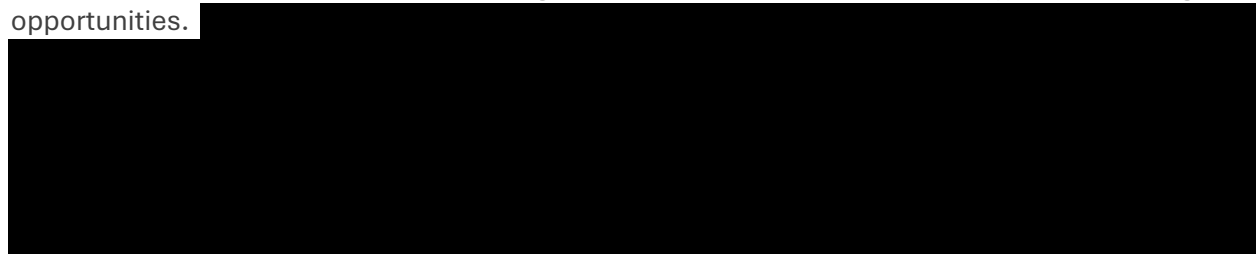
Strata also looks for ways to contribute to important community events and community programs to help make positive impacts in project communities. For example, Strata recently collaborated with the Durham Youthworks Workforce Program in North Carolina to provide career cluster pathways training to youth interested in the energy sector, partnered with the North Carolina's Governor's Office to be the first Clean Energy Youth Apprenticeship participant in the state, and collaborated with the Virginia 4-H Educational Partnership to provide Science, Technology, Engineering, and

Mathematics (STEM) learning kits and specificized energy education to 1,500 youths. Strata is a community partner on social causes, providing continual financial support to Carolina Tiger Rescue, a homelessness and poverty alleviation non-profit (Community Empowerment Fund), and the Salvation Army. For additional examples of how Strata puts communities at the core of their projects, see: <https://stratacleanenergy.com/commitment/community-at-the-core/>. Strata's approach to community involvement and engagement has resulted in the successful execution of BESS and solar projects throughout the country.

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7.9.2 *Track Record of Avoiding, Minimizing, and Mitigating Impacts*

Strata completes a comprehensive suite of environmental, cultural, and land use studies at its project sites in an effort to design projects that avoid and minimize impacts to the natural and human environments. Project infrastructure is designed to avoid sensitive resources (e.g., wetlands, cultural sites) identified during surveys. Where potential impacts cannot be avoided and/or minimized, Strata works with resource agencies and communities to identify suitable mitigation opportunities.

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[REDACTED]

Additionally, the Project's team members (including consultants) have designed and executed public communication plans (including mail, phone, and web-based services) to communicate with residents, share project and construction information, and receive concerns to be addressed promptly or in real time, avoiding minimizing, or mitigating neighborhood impacts to the greatest extent practicable. The Project's team members have also designed, negotiated, and executed equitable mitigation plans to minimize community impact and maximize community benefit.

[REDACTED]

7.10 Public Support and Community Engagement Plan

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.

7.10.1 Public Support for the Project

As described in Section 7.9, the Company seeks to work with local communities on all of its projects, receive meaningful feedback on project design, make efforts to reduce inconveniences during construction and operations, and develop projects that benefit local communities through providing a range of local benefits, including increased tax revenue and increased grid reliability. The Project's team members have extensive experience working with communities and addressing legitimate concerns regarding new and unique projects [REDACTED]

[REDACTED]

[REDACTED]

Through the execution of a robust, thorough, and adaptive community engagement plan (see Section 7.10.2), the Company expects to create broad community awareness of the Project and to receive meaningful feedback from community members, local advocates, public officials, and others. The Company anticipates some community concerns that can be addressed through dialog, information sharing, and Project avoidance, minimization, and mitigation measures worked out in collaboration with key officials and community leaders.

7.10.2 *Stakeholder Outreach and Community Engagement Plan*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



8 Safety Plan

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

8.1 Safety Plan Attachment

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.*

A Safety Plan for the Sea Breeze Energy Storage Project (the “Project”) is included as Attachment 8-1. The Safety Plan includes Project drawings and datasheets. The Safety Plan also describes plans to comply with the applicable UL equipment listings and certifications for the proposed Battery Energy Storage System (BESS) technology, the plan to develop the Project’s site-specific Hazard Mitigation Analysis (HMA) and Emergency Response Plan (ERP), the plan to develop and provide first responder training, and explosion control measures.

8.2 Incident Preparedness

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.

Sea Breeze Energy Storage, LLC (the “Company”) is dedicated to preparing first responders for a potential incident at the facility. The Company will provide a site-specific ERP, first responder training, a water tank, fire apparatus access, a fire alarm system, and facility personnel training to ensure that, if an incident were to occur, all mitigation features are in place to ensure the safety and well-being of first responders and the surrounding community. Additional discussion of incident preparedness and fire safety measures is provided in Attachment 8-1.

8.3 Safe Operation Measures

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.

The Project’s fire protection systems (fire alarm and water tank) will meet the inspection, testing, and maintenance requirements of NFPA 72 and NFPA 22, respectively.

The proposed battery units [REDACTED] will undergo periodic inspection, testing, and maintenance as required by

The BESS and the Balance of Plant (BOP) equipment will be monitored by the fire alarm system, the supervisory control and data acquisition (SCADA) system, on-site personnel, and remote operations. The fire alarm system will automatically notify the fire department upon receipt of an alarm. The Project’s monitoring systems will dispatch site operations and maintenance (O&M) personnel upon detection of an abnormality.

8.4 Potential Failure Consequences

Please describe consequences resulting from various levels of potential failures and safety events.

The Company will prepare a site-specific HMA for the Project that assesses the potential failures that could occur. See the Safety Plan provided as Attachment 8-1 for further description of the HMA.

BESS incidents typically present the following hazards, which are addressed by both the BESS product and the site design:

- **Fire:** [REDACTED]
[REDACTED] The intent of the LSFT is to demonstrate the spacing at which a thermal runaway event in an initiating cabinet will not propagate to an adjacent cabinet.
- **Explosion:** The [REDACTED] is provided with an explosion control system that will be evaluated and compliant with NFPA 855. Additional details of the explosion control system can be found in the Safety Plan (see Attachment 8-1) and will be included in the HMA.
- **Plume:** The fire department will be provided with training that will demonstrate proper staging and monitoring of a potential plume from a BESS fire. Air sampling from previous BESS fires have shown limited off-site impact.
- **Soil and Water:** Application of firefighting water at BESS facilities has created a concern for potential contamination in the water or soil. For previous BESS fires where

environmental sampling was conducted, water and soil samples did not reveal hazardous contamination levels requiring remediation.

The American Clean Power Association has published a document titled, “Assessment of Potential Impacts of Fires at BESS Facilities,” which analyzes historical BESS incidents and how advancements in safety regulations and technology have mitigated risks. The document can be found below:

https://cleanpower.org/wp-content/uploads/gateway/2025/03/Assessment-of-Potential-Impacts-of-Fires-at-BESS-Facilities_FINAL_Sep-2025.pdf

8.5 Continuous Safety Improvement

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

The Project will adhere to the inspection, testing, and maintenance requirements for its fire protection systems as required by the National Fire Protection Association (NFPA). Additionally, ongoing maintenance will be provided at the facility that meets [REDACTED] standards for the [REDACTED]. As industry and fleet best safety practices develop, they will be proactively implemented in operations, as appropriate.

8.6 Reporting Protocols

Please describe reporting protocols, both internally and externally.

The Project’s NFPA 72 fire alarm system will automatically notify the fire department upon initiation of an alarm signal.

The Project’s monitoring systems will dispatch site O&M personnel upon detection of an abnormality. On-site personnel will maintain monthly report logs to track performance of the Project and maintenance activities.

8.7 Safety Plan Experience

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.

The Company has contracted [REDACTED] to provide fire protection engineering consulting services for the Project. [REDACTED]

[REDACTED]

[REDACTED]

Strata [REDACTED] has constructed similar BESS projects, some of which also deploy [REDACTED] battery products, as summarized in Section 9.1.vii. Strata has been responsible for developing and implementing safety plans, including ERPs and HMAs, and providing safety trainings to site personnel and first responders for these projects. Strata also operates similar BESS projects, as summarized in Section 12.5, and has been implementing and improving safety plans and system designs for these projects.

Strata engages closely with the manufacturers being considered, including design reviews, performing factory visits, requiring Failure Mode and Effects Analysis (FMEA) reports, independent engineering diligence reports, and design working sessions. Strata has provided input to manufacturers about requirements for meeting codes and standards, design best practices (as further detailed in Section 8.8), and project-specific safety requirements. Strata hires expert third party advisors to perform factory acceptance tests and monitoring of equipment being produced to ensure it complies with designs and standards.

Strata is a member of industry organizations to maintain up-to-date knowledge of industry safety best practices and knowledge. Strata has participated in NFPA 855 development working groups to provide expertise from its project experience and thus has firsthand understanding of the intent and considerations going into the codes.

Strata contracts with experienced consultants such as [REDACTED] to support the development of project-specific safety plans and coordination with local authorities and emergency responders. Strata considers their industry knowledge as critical to minimizing project risk and implementing best practices across designs and operations.

Strata has evolved these safety protocols through its extensive experience developing, constructing, and operating BESS projects, including contracting and deploying one of the biggest BESS projects at the time, [REDACTED]

8.8 Prior Safety Incidents

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8.9 Community & First Responder Engagement

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.

[REDACTED]

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.

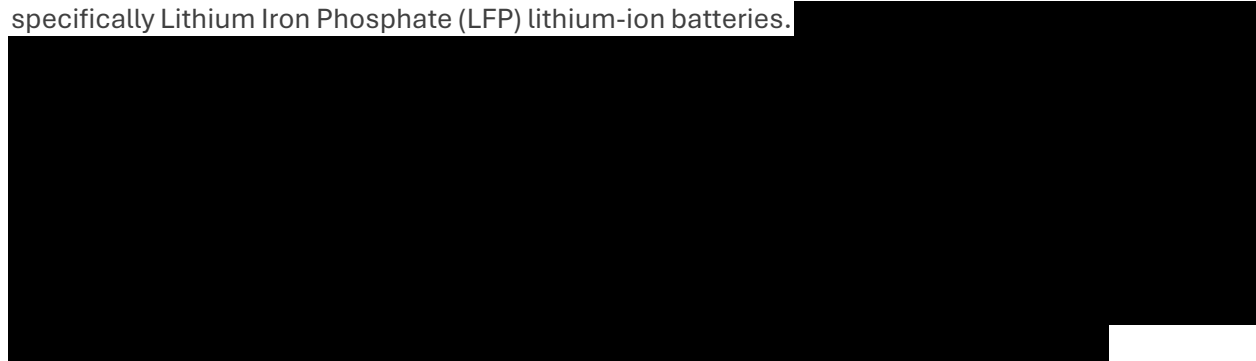
Please answer the following questions in Section A-9 for each Transmission Project and Distribution Project being bid:

9.1 Preliminary Engineering Plan

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

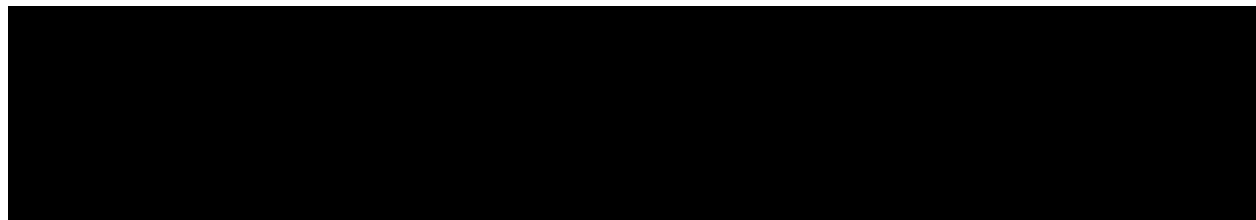
- i. Type of energy storage technology (e.g., mechanical, chemical, thermal) and the specific details of the energy storage technology and how it works.*

The Sea Breeze Energy Storage Project (the “Project”) proposes to use chemical batteries, specifically Lithium Iron Phosphate (LFP) lithium-ion batteries.

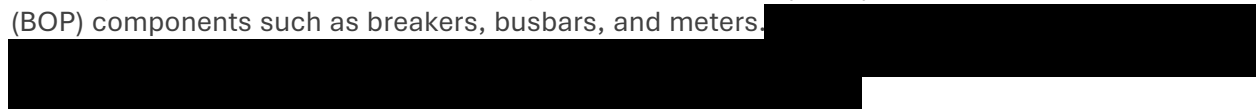


- ii. Major equipment to be used including the components of the energy storage technology itself and surrounding system (e.g., inverter, enclosures, HVAC, meters, electrical and communication equipment, fire suppression).*

BESS and Project Substation



The Project Substation will include main power transformers (MPTs) in addition to Balance of Plant (BOP) components such as breakers, busbars, and meters.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- iii. *Manufacturer of each of the equipment components listed above as well as the location of where each component will be manufactured.*

[REDACTED]

- iv. *Status of acquisition of the equipment components, including whether orders are in place and/or production slots secured.*

[REDACTED]

[REDACTED]

- 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.*

See the discussion above.

vi. Equipment vendors selected/considered.

[REDACTED]

vii. Track record of equipment operations, including safety record.

Strata has a proven track record of deploying utility-scale BESS [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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.

The proposed BESS product is designed to be compliant with UL 9540, UL 9540A, UL 1973, UL 1642, IEC 62619, and IEEE 1547 and the inverters are designed for UL 1741 compliance. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ix. *Description of equipment warranties and guarantees, including terms and expiration.*

[REDACTED]

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.*

Equipment procurement has been initiated, and final selection will be made through a competitive request for proposals (RFP) process using Strata's AVL. [REDACTED]

9.2 Key Equipment Suppliers Under Consideration

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

[REDACTED]

9.3 Comparable Installed Equipment

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.

An overview of the equipment track record for the proposed BESS technology, including the number of projects operating, installed capacity, and availability, is provided in Section 9.1.

9.4 Technology Readiness

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.

[REDACTED]

[REDACTED]

9.5 Complete Equipment List

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.

The original equipment manufacturer (OEM)-supplied data sheet for the proposed BESS technology is provided as Attachment 9-2.

[REDACTED]

[REDACTED]

[REDACTED]

9.6 Equipment Securement & Long-Lead Equipment

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.

[REDACTED]

9.7 Technology Fire/Thermal History

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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 Critical Path Schedule

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.

Sea Breeze Energy Storage, LLC (the "Company") has developed a prudent schedule to ensure on-time delivery of the Sea Breeze Energy Storage Project (the "Project") [REDACTED]. The Project's schedule, which identifies critical path items, is provided as Attachment 10-1. The Project's schedule depicts key activities and milestones related to interconnection studies and approvals, facility contracts, the acquisition of real property rights/site control, surveys and preliminary engineering, permitting, environmental assessment, stakeholder outreach, procurement, financing, contracting, and construction. Critical path items are discussed further in Section 10.3. Based on [REDACTED] ("Strata's") experience and track record managing similar projects (as detailed in Section 13), Strata is confident that the proposed schedule is realistic and achievable.

10.2 Project Schedule Credibility

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.*

10.2.1 Permitting and Environmental Assessment

The Company has developed a robust permitting plan that de-risks the overall Project schedule.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The federal permits and reviews required for the Project are minimal (see Section 7.8.2). The only federal permit expected to be required for the Project is a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the Environmental Protection Agency (EPA), along with associated federal consultations. The Project may also need to submit a Notice of Construction or Alteration (Form FAA 7460-1) to the Federal Aviation Administration (FAA) for any proposed construction activities that could impact navigable airspace. Both of these are routine processes that will occur shortly before construction.

The Company's plan for completing all permitting processes is discussed further in Section 7.

10.2.2 *Financing Plan*

The Project is expected to be financed with debt, tax equity, and equity from Strata. The debt facility is expected to be a construction-to-term loan with a working capital/letter of credit (LC) facility for any Project credit support, including Long-Term Contract (LTC) LCs, Interconnection LCs, etc. Strata has long-standing relationships with several banks that have been used by Strata on past financings.

[REDACTED] A more comprehensive list of potential Construction Period Lenders and

[REDACTED]

Operating Period Lenders and/or Tax Equity Partners is laid out in Section 5.3. [REDACTED]

[REDACTED] The Project's financing plan and schedule are informed by Strata's considerable experience financing similar projects. Since its founding in 2008, Strata has raised over [REDACTED] in total debt and [REDACTED] in tax equity across [REDACTED] tax equity transactions. To confirm the Project's financing schedule, Strata has held preliminary discussions with its debt and tax equity partners on timing and expected terms, having closed three BESS financings with this structure and counterparty group in the past three years (see Section 5.6).

All pre-NTP spend, which includes development and permitting costs, is funded from Strata's balance sheet (see Strata's 2025 Audited Financial Statements in Attachment 5-1) and [REDACTED] of corporate debt facilities (see Section 5.3). [REDACTED]

The Project budget and capital structure have been designed to provide sufficient financial flexibility to manage and absorb potential adverse scenarios, including unforeseen construction and commissioning delays, labor and material cost escalation, supply chain disruptions, scope refinements, and other Project-related cost overruns. Strata's balance sheet and corporate debt facilities are also available to provide contingent capital to the Project in the event of delay or cost increase.

As described in Section 5.9, in addition to LTC revenue, the Project assumes ISO New England (ISO-NE) Forward Capacity Market, energy arbitrage, and ancillary services revenue. [REDACTED]

The Company's financing plan, including financial resources and strength, along with cost assumptions and a detailed financing track record, is discussed further in Section 5 and demonstrates the financial viability of the Project.

10.2.3 *Installation and Electrical Interconnection Plans*

[REDACTED] As such, the Project has a mature and

viable electrical interconnection plan. A complete description of the Project's interconnection plan, associated costs, [REDACTED] is provided in Section 6.

[REDACTED]

10.2.4 *Acquisition of Real Property Rights*

[REDACTED]

[REDACTED]

10.2.5 *Vendor Activity*

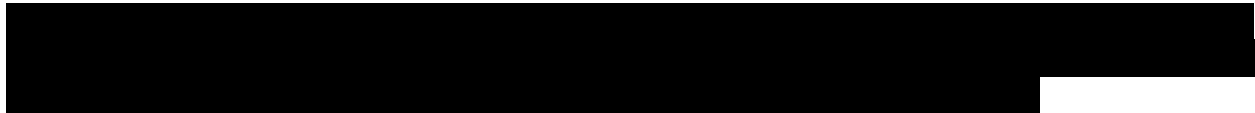
As described in Section 9, Strata maintains established commercial relationships and framework agreements with multiple Tier 1 BESS manufacturers and other equipment manufacturers, developed through successful execution of prior projects. [REDACTED]

[REDACTED]

10.3 Status of Critical Path Items

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

Critical path items are depicted on the Project schedule provided as Attachment 10-1 and include the following:

- 
 - **Procurement:** The critical path after permits are received is expected to be long-lead item manufacturing and deliver 
 - **Construction and Interconnection:** Once equipment has been delivered, the critical path entails finalizing the Project's construction and interconnection. The Project's construction plan is outlined in Section 11.
- 

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 Major Tasks and Specialized Equipment for Project Deployment

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

Major deployment tasks for the Sea Breeze Energy Storage Project (the “Project”) include:

- final engineering and construction planning;
- fire protection and emergency response coordination;
- site mobilization;
- erosion and sediment control installation;
- clearing, grubbing, grading, and access road improvements;
- installation of foundations, equipment pads, grounding, underground duct banks and cable trenches and/or aboveground cable trays, drainage improvements, fencing, and lighting;
- delivery, offloading, and placement of major equipment [REDACTED]
- installation of direct current (DC) and alternating current (AC) collection systems [REDACTED]
- installation of the high-voltage (HV) Project Substation [REDACTED]
- fiber optic, supervisory control and data acquisition (SCADA), metering, and control integration;
- substation testing, backfeed readiness, and energization coordination;

1

- final site work [REDACTED]
 - mechanical completion inspections; and
 - pre-commissioning, energization, functional testing, performance testing, and final turnover to the operations and maintenance (O&M) team.
- [REDACTED]
- [REDACTED]

11.2 Proposed Construction Approach

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

The proposed construction approach is to sequence the work so that site readiness, equipment delivery, electrical integration, and commissioning are aligned with Eversource's interconnection requirements and Long-Term Contract (LTC) milestone requirements. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11.3 Responsible Parties and Roles

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.

The Company (Sea Breeze Energy Storage, LLC) will retain overall responsibility for Project execution, contract compliance, schedule management, owner-provided equipment procurement,

interface coordination, reporting, commercial oversight, and achievement of the required LTC and Large Generator Interconnection Agreement (LGIA) milestones. [REDACTED]

The party (or parties) responsible for each deployment activity and their role is provided below:

- **Overall Project Management and Section 83E Round 2 Request for Proposals (RFP)/LTC Compliance:** The Company is the party responsible for overall Project management and RFP/LTC compliance. [REDACTED]

- **Engineering, Procurement, and Construction Execution:** The EPC contractor is the party responsible for this activity. [REDACTED]

- **BESS and MVT Supply:** [REDACTED]

- **Other MV Equipment and HV Equipment Supply:** The parties responsible for HV equipment supply (e.g., MPTs and HV breakers) and MV equipment supply are the equipment suppliers. [REDACTED]

- **Interconnection, Metering, SCADA, and Utility Witness Testing Coordination:** The parties responsible for these activities are the Company, EPC contractor, Eversource, and controls/SCADA vendors. [REDACTED]

[REDACTED]

Commissioning and Turnover: The Company, EPC contractor, BESS supplier, and independent testing providers are involved in this activity.

[REDACTED]

[REDACTED]

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 O&M Plan

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.

[REDACTED]

[REDACTED] These personnel will be responsible for routine inspections, monitoring, troubleshooting, site upkeep, and coordination of maintenance activities. The Battery Energy Storage System (BESS) manufacturer (see Section 9.1) will provide maintenance services, technical support, and warranty coverage for the BESS (including inverters) and medium-voltage transformers (MVTs) under a 20-year service agreement, including preventive and corrective maintenance activities.

[REDACTED]

[REDACTED] Battery performance and degradation will be continuously monitored through the BESS monitoring and control systems [REDACTED]

[REDACTED]

[REDACTED]

Major maintenance activities will include scheduled inspections, electrical equipment servicing, heating, ventilation, and air conditioning (HVAC) maintenance, protection and control system checks, and software/firmware updates in accordance with the manufacturer's recommendations. Additional discussion of maintenance activities is provided in Section 3.9. Equipment testing will include continuous remote monitoring, periodic functional testing of protection and control systems, battery health assessments, supervisory control and data acquisition (SCADA) verification, and post-maintenance testing to ensure safe and reliable operation throughout the life of the Project.

Strata's O&M approach is based on practices successfully utilized across its operating utility-scale renewable energy portfolio and is designed to support high system availability and long-term asset performance. While routine maintenance personnel will be present on site during normal operating

hours, the Project will be continuously monitored 24 hours per day, 7 days per week through Strata's Remote Operations Center (ROC) in North Carolina, which provides real-time system oversight, alarm management, operational support, and coordination of field response activities to enable rapid identification and resolution of equipment performance issues and abnormal operating conditions. Preventive maintenance schedules will be periodically reviewed and adjusted based on equipment condition, operating data, maintenance history, manufacturer recommendations, and lessons learned from Strata's operating fleet. This proactive approach is intended to reduce corrective maintenance events, maximize reliability, and support the long-term operational viability of the Project.

12.2 Funding Mechanism & Levels

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

Planned and unplanned O&M activities will be funded through the Project's annual operating budget, which is supported by Project revenues generated through contracted energy storage services and participation in applicable energy and capacity markets.



Planned O&M expenditures include routine inspections, monitoring, maintenance of BOP equipment, planned battery augmentation, vegetation management, cybersecurity maintenance, environmental compliance, and other scheduled maintenance activities performed under the applicable O&M agreements. Unplanned O&M expenses, including emergency repairs, corrective maintenance, and unexpected equipment failures, will be funded through the Project's operating budget and contingency reserves established for the facility.

In addition, the BESS (including inverters), MVTs, and other major equipment will be covered under long-term manufacturer warranties and service agreements, including preventive and corrective maintenance obligations, significantly reducing the Project's exposure to major repair and replacement costs. This funding structure ensures adequate financial resources are available to support the safe and reliable operation of the Project throughout its useful life.



12.3 Equipment Warranties

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

The BESS manufacturer will provide a comprehensive 20-year warranty and long-term service agreement for the BESS (including inverters) and MVTs. The agreement is expected to include both preventive maintenance and corrective maintenance services, technical support, remote monitoring, repair or replacement of defective components covered under warranty, and performance assurance in accordance with the manufacturer's warranty terms. The main power

transformers (MPTs) and high-voltage (HV) breakers are expected to carry a five-year and a one-year manufacturer's warranty, respectively. Critical spare parts for the MPTs and HV breakers will be maintained on site and readily available to support maintenance and replacement needs after the warranty periods expire, to minimize potential equipment downtime. Final warranty coverage, guarantee terms, and expiration dates will be established during the vendor selection and contracting process. The combination of long-term manufacturer support and Strata's internal O&M program provides a robust framework for reliable Project operation throughout the facility's service life.

12.4 O&M Contract Status

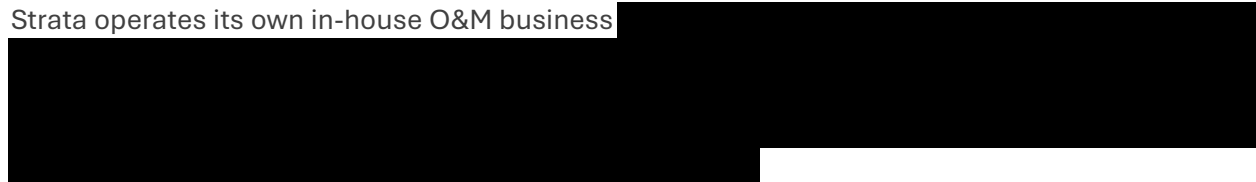
Describe the status of the project sponsor in securing any O&M agreements or contracts. Include a discussion of the sponsor's plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.



12.5 O&M Experience

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

Strata operates its own in-house O&M business



Examples of similar energy storage projects supported by Strata's O&M organization include:

1. Justice Energy Storage — 150 megawatts (MW)/600 megawatt-hours (MWh) in Buckeye, Arizona
2. Poblano Energy Storage — 70 MW/280 MWh in Rialto, California
3. Dulles Solar and Storage — 100 MW solar & 50 MW/200 MWh in Loudoun, Virginia
4. Dry Bridge Storage — 20 MW/80 MWh in Chesterfield, Virginia

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 Organizational Chart

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

The Legal Organization Chart and Team Organizational Chart for the Sea Breeze Energy Storage Project (the “Project”) are provided as Attachments 13-1 and 13-2, respectively. [REDACTED]

13.2 Participant Experience

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.

The Team Organizational Chart included as Attachment 13-2 provides details on team member experience. The Project team’s experience is also further discussed in Sections 13.4 and 13.7.

13.3 Key Personnel & Management

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).*

The Team Organizational Chart included as Attachment 13-2 identifies the key personnel dedicated to the Project, along with a description of their experience and a link to their LinkedIn resumes. The Strata Project List included as Attachment 13-3 details the significant experience of the Strata team in developing, operating, and financing projects of similar size and complexity as the Project.

13.4 Project Experience

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.*

Attachment 13-3 provides a list of projects that Strata has successfully developed or that are currently under construction.

13.5 Non-Local Experience

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.

Strata was founded in 2008 and has successfully developed projects in markets across the United States (US), as evidenced by Attachment 13-3. Strata is combining its broad development experience with local expertise to ensure the success of the Project. [REDACTED]

[REDACTED] The experience of Strata and its consultants (several of which are Massachusetts-based) is further detailed in Section 13.7.

13.6 Project Team Roles

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

- i. Construction Period Lender*

While no construction period lender has been selected for the Project, and financial close is not expected until [REDACTED], Strata has long-standing relationships with the following lenders and has used them on past debt financings: [REDACTED]

[REDACTED] Section 5.3 provides additional description of the Project's financing plan.

ii. Operating Period Lender and/or Tax Equity Provider

While no operating period lender and/or tax equity provider has been selected for the Project, and financial close is not expected until [REDACTED] Strata has long-standing relationships with the following lenders/tax equity providers, and has used them on past financings:

- [REDACTED]
- [REDACTED]

Section 5.3 provides additional description of the Project's financing plan.

iii. Financial Advisor

While no financial advisor has been selected for the Project, Strata has relationships with the following institutions: [REDACTED]

iv. Environmental Consultant

[REDACTED] is leading the environmental permitting and environmental assessments for the Project. Additional consultants supporting the Project's environmental permitting and assessments include [REDACTED]

[REDACTED] Additional description of these firms is provided in Section 13.7.1.

v. Facility Operator and Manager

[REDACTED]

vi. Owner's Engineer

While no owner's engineer has been selected for the Project, [REDACTED] could provide the necessary services.

vii. Transmission/Delivery Consultant

The Project's transmission/delivery consultant is [REDACTED] is described in Section 13.7.1.

viii. Legal Counsel

[REDACTED] are providing legal counsel for the Project. See Section 13.7.1 for additional description of [REDACTED]

13.7 Team Expertise & Continuity

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.

13.7.1 Development Experience

Strata Clean Energy

As detailed in Attachment 13-3, the Strata development team has developed and currently owns over 900 MWdc of solar and 80 MWac of battery projects across the US. The development team has also developed and sold 1.4 GWdc of solar and 950 MWac of battery projects across the US. Strata's development team has successfully partnered with and executed repeat business with large utilities such as Dominion Energy in Virginia and Arizona Public Service (APS) in Arizona.

The Strata development team is currently advancing a nationwide pipeline of 9.5 GW in 18 states. This includes 2.6 GW of standalone solar, 4.4 GW of standalone batteries, and 2.5 GW of solar + battery hybrid projects. As a vertically integrated company, Strata contains development, construction management, and O&M departments, and has an established process for handoff between divisions that ensures project continuity.

As detailed below, Strata’s development team is supported by several consultants who have direct experience working together on renewable energy projects in Massachusetts, including utility-scale BESS projects.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13.7.2 *Financing Experience*

Regarding financing experience and capabilities, Strata has long-standing relationships (many 10+ years) with leading banks, lenders, and tax equity investors. With their support, Strata's capital markets team has raised over [REDACTED] in total debt and over [REDACTED] in tax equity and has executed [REDACTED] tax equity transactions. Additional description of Strata's financing experience is provided in Section 5.6.

13.7.3 *Construction Experience*

Regarding construction experience, Strata has an internal engineering, procurement, and construction (EPC) team. Strata's EPC team builds utility-scale solar and storage projects with a focus on schedule certainty. Within Strata's EPC team, the procurement team has direct Tier 1 relationships with leading major equipment manufacturers and routinely performs factory audits. Strata's EPC team currently has 1+ GW of projects in active construction for third parties and has built 250+ projects while meeting utility-level operational standards.

[REDACTED]

13.7.4 *Operations and Maintenance Experience*

[REDACTED]

Strata's O&M team manages 280+ solar and storage assets across 24 states totaling 3.7 GW.

The O&M team performs 24/7 remote monitoring with inverter- and system-level diagnostics via its Remote Operations Center (ROC). Field response times are rapid and dispatched through predictive and preventative maintenance programs. The O&M team is North American Electric Reliability Corporation (NERC)-compliant and Independent System Operator (ISO)/Regional Transmission Operator (RTO)-compliant across all active markets. Section 12.5 and Attachment 12-1 provide additional discussion of Strata's O&M experience.

[REDACTED]

13.8 *Development Track Record*

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.

Strata has considerable experience successfully developing similar projects, as detailed in Section 13.7.1 and in Attachments 13-2 and 13-3. Strata's current development strategy for the Project is conservative and takes into consideration all relevant timelines in order to mitigate the risk of COD delays (see Section 10). Section 5.23 describes failures to achieve COD under other contracts.

13.9 Regulatory Advocacy Experience

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.

Strata team members have completed National Environmental Policy Act (NEPA) and other federal permitting-related actions for more than 2 GW of utility-scale solar and storage on federal and tribal trust lands in Nevada and Arizona. In senior development roles, members of Strata's development leadership team led multiple projects that included Environmental Impact Statements (EISs) carried through Record of Decision, an Environmental Assessment and Finding of No Significant Impact for a 500-kilovolt (kV) interconnection, and Bureau of Land Management (BLM) right-of-way (ROW) applications advanced through the Western Solar Plan variance process and a programmatic EIS. That work spanned lead-agency coordination with the Bureau of Indian Affairs and BLM; cooperating-agency engagement with the Environmental Protection Agency (EPA), US Fish and Wildlife Service, the Bureau of Reclamation, and the Nevada Department of Wildlife; Endangered Species Act Section 7 consultation; National Historic Preservation Act Section 106 and government-to-government tribal consultation; public scoping and comment response; and negotiation of the leases, ROWs, and mitigation commitments that the decision documents authorized.

[REDACTED]

[REDACTED]

[REDACTED]

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13.10 Failed or Terminated Projects

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.

The Company, Strata, and its affiliates have not been involved in a complex development project that either failed, was withdrawn, did not proceed, defaulted under, or terminated a contract in a major state procurement similar to the Section 83E Round 2 procurement.

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 Job Creation Estimate

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.

The Sea Breeze Energy Storage Project (the “Project”) will create numerous jobs in [REDACTED] (the Project’s host county) and throughout the Commonwealth, resulting in significant economic benefits. [REDACTED]

Sea Breeze Energy Storage, LLC (the “Company”) engaged [REDACTED] to assess the Project’s economic and community benefits, the results of which are detailed below. The assessment quantified the Project’s direct, indirect, and induced impacts. Direct impacts are the jobs and earnings of the people who develop, build, and operate the Project. Indirect impacts are the jobs and earnings at Massachusetts suppliers and contractors that serve the Project. Induced impacts are the jobs and earnings supported as direct and indirect workers spend their wages in the state. Employment is measured in full-time equivalent (FTE) jobs, and construction employment is stated as the average number of FTE jobs in each year of the construction period. Labor income includes wages, salaries, benefits, and the income of self-employed workers. All dollar figures presented below are in 2026 dollars.

14.1.1 Job Creation During Project Development

Development of the Project is underway. The Company’s development staff and its engineering, environmental, legal, and permitting consultants are carrying out the Project’s site studies, design, and permitting process, as described in Section 7. Based on the Project’s budget for permitting, engineering, environmental studies, interconnection studies, and outside professional services (e.g., legal, appraisal, and accounting), [REDACTED] estimates that this work supports an average of [REDACTED]

[REDACTED] These positions are with the Company’s consultants, several of whom are Massachusetts-based (see Sections 13.6 and 13.7). The estimate of job creation during Project development is conservative (i.e., underestimates job

creation) because it excludes the Company’s own development staff, and development jobs are not counted in the construction estimates.

14.1.2 Job Creation During Project Construction

Constructing the Project would support an estimated average of [REDACTED] of direct labor income. The Project’s purchases from Massachusetts suppliers and contractors would support an estimated average of [REDACTED] jobs. Workers spending their earnings in the state would support an estimated average of [REDACTED]

Workers living in [REDACTED] permanently or temporarily during construction would fill an estimated average [REDACTED] With the County’s share of the indirect and induced impacts, construction of the Project is estimated to result in an average of [REDACTED] in [REDACTED] together would supply an estimated [REDACTED] direct construction employment, and the remainder would come from the greater Boston labor market.

Table 14-1 [REDACTED]

[REDACTED]

Table 14-2 lists the [REDACTED] that are expected to comprise the largest share of the Project’s construction labor hours, ranked by average annual employment. Electricians, apprentices, and helpers in the construction trades, electrical power-line installers and repairers, and electrical and electronics repairers for substations and relays make up an estimated [REDACTED] of all direct construction employment. Table 14-2 also provides the average hourly total compensation for each occupation. For the construction trades, compensation reflects the Massachusetts prevailing wage packages, including wages and fringe benefits. For construction managers, maintenance and repair workers, and electrical and electronics repairers for substations and relays, it reflects regional market wages with benefits. [REDACTED]

[REDACTED]

Table 14-2

--

Average compensation across all construction occupations is an estimated

These construction jobs would be at the Project Site in . The employers would be the Project’s engineering, procurement, and construction (EPC) contractor and its subcontractors, . As described in Section 14.3, (“Strata”) has extensive experience with contractors and subcontractors that are signatory to union agreements and intends to engage in Project Labor Agreement (PLA) negotiations with labor organizations during the Project’s permitting process. As discussed further in Section 14.2, the Company anticipates a “look local” provision in Project contracting, asking contractors and subcontractors to pursue local firms and workers where possible. The Company will also provide guidance to Project contractors and subcontractors on identifying and recruiting local companies and Women-, Minority-, and Disabled Veteran-Owned Business Enterprises (WMDVBE).

14.1.3 Job Creation During Project Operations and Maintenance

Operating and maintaining the Project would create an estimated direct FTE jobs in each year of its 20-year operating life. Of these, are expected to be full-time on-site jobs in with the Company. The on-site staff may include a plant manager, an electrical engineer, field technicians and specialists, and security and administrative support. The remaining FTE jobs are expected to be filled by visiting specialists, the battery supplier’s field technicians working under the long-term

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2

service agreement, and Eversource crews maintaining the Interconnection Facilities. [REDACTED]

[REDACTED]

[REDACTED] These benefits would continue throughout the Project’s 20-year operating period.

Table 14-3 [REDACTED]

[REDACTED]

[REDACTED]

Table 14-4 [REDACTED]

[REDACTED]

14.2 Inclusive Employment Opportunities

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 described in Section 14.1, the Project will create employment opportunities for workers in

[REDACTED] The Company will engage with members of these communities, relevant community organizations, and Tribal Governments to ensure they are aware of the Project's employment opportunities.

More specifically, as part of the Company's stakeholder outreach and community engagement plan (see Section 7.10.2), the Company plans to meet with representatives of Tribal Governments in the region to discuss Project attributes, receive relevant feedback, discuss potential employment and contracting opportunities, and pursue collaborations to facilitate employment pathways for members of these Tribes.

The Company has engaged in early-stage dialog with a range of experts and organizations in the workforce development and local supply-chain space to help inform the Company on the design and implementation of local workforce and supply chain initiatives (see the Project's Diversity, Equity, and Inclusion [DEI] Plan provided as Attachment 14-1 for details). The Company plans to seek further guidance from EJ, workforce, and economic development organizations regarding employment opportunities and to explore partnerships. A preliminary assessment of relevant groups is contained in the stakeholder map provided as Attachment 7-6. Drawing on these organizations' regional knowledge and experience with the clean energy industry, the Company will work to refine and implement policies and guidance to foster employment and procurement/contracting opportunities during the Project for local workers and minorities, women, veterans, lesbian, gay, bisexual, and transgender (LGBT) persons, and persons with disabilities.

To capture opportunities for local benefit, the Company anticipates instituting a "look local" provision in Project contracting, requesting that contractors and subcontractors pursue local firms and workers where possible for work on the Project. Further, the Company will work with experienced groups listed in the stakeholder map (see Attachment 7-6) and others to craft guidance for Project contractors and subcontractors on identifying and recruiting local companies and WMDVBE. The Company plans to solicit guidance from established organizations including the Massachusetts Supplier Diversity Office and programs supported by the Massachusetts Clean Energy Center (MassCEC). This will ensure that Project contractors have the guidance and direction to connect with local companies and WMDVBE and make subcontracting opportunities available for members of these critical constituencies.

Some of the above prospective collaborations and initiatives may be captured as part of a Community Benefit Agreement or Community Benefit Plan, as discussed further in Section 14.3.

14.3 Workforce & Community Agreements

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.

During the Project's permitting process (see Section 7), the Company intends to engage in PLA negotiations with labor organizations (including those contained in the stakeholder map provided as

Attachment 7-6). Strata has extensive experience utilizing contractors and subcontractors who are signatory to union agreements, including multi-party PLAs. [REDACTED]

Relatedly, the Company has identified job training, workforce development, and vocational training institutions that it will meet with to discuss Project-related employment opportunities (see Attachment 7-6). As discussed in Section 14.2, where possible, the Company intends to contract with locally based companies and WMDVBE.

The Company will also engage with the [REDACTED] and seek input from key stakeholders³ regarding the development of a Community Benefit Plan and/or Community Benefit Agreement, which is intended to meet broader community needs, but may also include provisions regarding local contracting and employment opportunities. A Community Benefit Plan is a non-legally binding document that would outline how the Company would engage with and provide meaningful benefits to the surrounding communities during the Project's lifecycle. This plan would serve as a foundation for communication, trust, and transparency between the Company and surrounding communities. A Community Benefit Agreement is a legally binding agreement that would describe the specific benefits that the surrounding communities would receive from the Project. The Company will work with the Town and key stakeholders to identify local needs, priorities, and concerns to inform the development of tangible and lasting Project benefits that enhance the communities' overall well-being, stability, and resilience.

If the Company and the Town (or local community organization) collaboratively agree to pursue a Community Benefit Plan and/or Community Benefit Agreement, [REDACTED]
[REDACTED] which outlines EJ principals and best practices for providing meaningful, measurable benefits to communities hosting energy infrastructure. Depending on the needs of the community, elements of the Community Benefit Plan/Agreement may include:

- committing to providing employment opportunities for local workers;
- funding pre-apprenticeship programs and supporting pathways to registered apprenticeships;
- forming community partnerships to offer services such as childcare, transportation, and language support at reduced cost for individuals participating in pre-apprenticeship or apprenticeship programs;
- prioritizing local companies and WMDVBE during procurement;
- entering into Labor Peace Agreements or PLAs;

3 [REDACTED]

- investing in upgrades to local infrastructure; and/or
- partnering with Tribes to guide stewardship practices or develop mitigation plans.

14.4 Job Creation Commitments

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.

[REDACTED] the Company anticipates instituting a “look local” provision in Project contracting, requesting that contractors and subcontractors pursue local firms and workers where possible for work on the Project. [REDACTED]

14.5 Other Economic Activity

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.

In addition to job creation and associated labor income (see Section 14.1), the Project will generate other economic activity in Massachusetts as well as tax revenue. “Output” is the total value of the goods and services produced in Massachusetts because of the Project’s spending. It counts the spending itself and the supplier purchases and household spending it sets in motion. The economic impacts of the Project’s in-state construction and operations spending are summarized in Sections 14.5.1 and 14.5.2, respectively, and tax revenue generated by the Project is discussed in Section 14.5.3. [REDACTED]

[REDACTED] All dollar figures presented below are in 2026 dollars (except where noted), and lifetime totals are undiscounted sums over the 20-year operating period. [REDACTED] figures are the County’s estimated share of the statewide impacts, based on where workers are expected to live.

14.5.1 Economic Impacts of In-State Construction Spending

[REDACTED]

Table 14-5

[REDACTED]	
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[REDACTED]	
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Table 14-6

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14.5.2 *Economic Impacts of In-State Operations Spending*

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Table 14-7

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14.5.3 *State and Local Tax Revenues*

Tax Revenue Generated by Construction and Operations Activity

The Project's construction and operations activity in Massachusetts will generate tax revenue as contractors, suppliers, and workers pay income, sales, property, and other taxes and fees. [REDACTED]

Table 14-8

14.5.4

[REDACTED]

14.6 Low-Income Ratepayer Benefits

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 [REDACTED]

† [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14.7 Fossil Fuel Community Benefits

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.

[REDACTED]

8 [REDACTED]

9 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Project will also benefit these communities by reducing demand for the peak-period generation that the Commonwealth’s oil- and gas-fired units supply. In addition to offsetting these more expensive and polluting electricity sources, the Project will improve overall grid reliability and reduce the need for expensive transmission upgrades and investment in new generation facilities (see Section 3.3). Other benefits to these communities provided by the Project are described throughout Sections 14.1 through 14.6.

14.8 Diversity, Equity, & Inclusion Plan

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.

The DEI Plan for the Project, which adopts the DEI strategies of the broader Strata organization, is provided as Attachment 14-1. The DEI Plan incorporates a Workforce Diversity Plan and a Supplier Diversity Program Plan. The Company commits to expanding its DEI Plan prior to LTC execution based on input received during the outreach and permitting process (see Section 7).

14.9 Commitment Tracking & Reporting

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.

As required by the Form Memorandum of Understanding (MOU) with DOER (see Section 14.10), the Company will track and report on its progress towards achieving the Project's employment, economic, and other benefits as well as the goals of the DEI Plan included as Attachment 14-1. Consistent with the requirements of the executed Form MOU, the Company will prepare and submit annual progress reports to DOER summarizing the Company's progress in achieving its direct economic investment and development commitments, required employment statistics, and the status of EJ impacts as well as engagement with and employment opportunities for EJ Populations. The Company's tracking and reporting plans for the Project may be expanded beyond those specifically required by the Form MOU and could include the tracking and reporting of broader community, environmental, economic, and other commitments that may arise as part of Project development and permitting. Additional details about tracking and reporting on the Project's commitments are provided in the DEI Plan (see Attachment 14-1).

14.10 Form MOU Markup

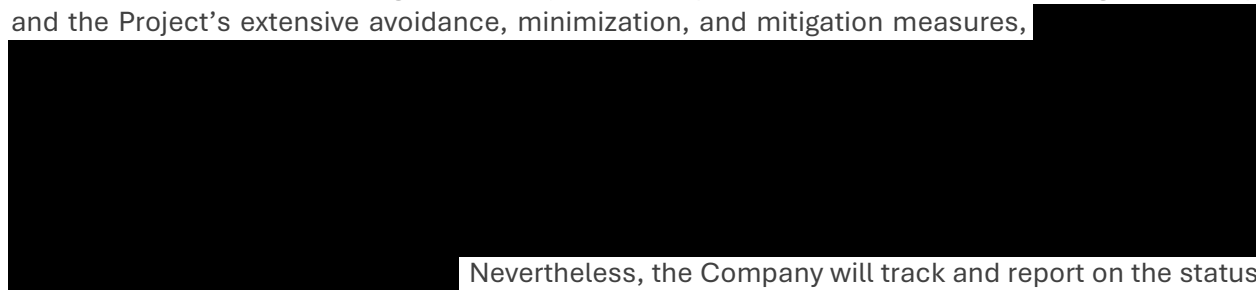
Please provide a marked version of the Form MOU with DOER for this solicitation showing any specific proposed changes to the Form MOU. Bidders are discouraged from proposing any material changes or conditions to the Form MOU and any such changes will be considered in the Stage Two Qualitative Evaluation.

Proposed changes to the Form MOU with DOER are provided in a redline format as Attachment 14-2.

14.11 EJ & Employment Tracking Plan

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.

As described in Section 14.14, given the Project's anticipated benefits to the surrounding community and the Project's extensive avoidance, minimization, and mitigation measures,



Nevertheless, the Company will track and report on the status of EJ impacts as well as engagement and employment opportunities consistent with the requirements of the Form MOU. For further discussion on how the Company plans to track and report on a range of activities, progress, and commitments, see Section 14.9 and the DEI Plan provided as Attachment 14-1.

14.12 Stakeholder Engagement Experience

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.

As discussed further in Section 7.9, Strata's approach to stakeholder engagement has resulted in the successful execution of Battery Energy Storage Systems (BESS) and solar projects throughout the country. Strata views strong partnerships with the local community as essential to ensuring each project is supported by, and mutually beneficial to, the communities Strata works in. This starts with early communication with local authorities and outreach to local community members. This allows for public feedback and enables local priorities to be incorporated into a project's scope. Strata also looks for ways to contribute to important community events (food drives, festivals, 4-H/FFA, etc.) to help make positive impacts in project communities.



Section 7.9 provides additional details on the Project team's stakeholder engagement experience and track record of avoiding, minimizing, and mitigating environmental, tribal, EJ, and onshore impacts from projects similar to the Project.

14.13 Avoidance, Minimization, and Mitigation of Environmental Impacts

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.



[REDACTED]

[REDACTED] A preliminary characterization of the Project's potential environmental impacts and proposed measures to avoid, minimize, and mitigate those impacts are provided below. [REDACTED]

[REDACTED]

14.13.1 Wetlands, Waterbodies, and Water Supply Resources

As described in Section 7.5, the BESS, Project Substation, and Interconnection Facilities have been strategically sited to avoid direct impacts to wetlands, waterbodies, potential vernal pools, Federal Emergency Management Agency (FEMA) floodplains, [REDACTED] and other sensitive environmental resources to the maximum extent practicable. At this time, direct impacts to wetlands are expected to be avoided, [REDACTED]

[REDACTED] The Project will comply with the applicable wetland protection requirements [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Project will not generate any process-related wastewater. As noted above, stormwater during construction and operations will be treated by a stormwater management system designed to meet or exceed MassDEP's Stormwater Management Standards. In the unlikely event of a thermal incident at the Energy Storage Site, in accordance with the Project's site-specific Emergency Response Plan (ERP) (see Section 8), any fire suppression water that is used would not be directly applied to the BESS, substantively limiting the potential volume of fire suppression water runoff. The Company will properly manage emergency firewater runoff, if any, in line with the Project's ERP and applicable requirements. Overall, given the Project's use of a stormwater management system, coupled with the other safeguards listed above that are intended to prevent/minimize the release of pollutants to groundwater, the Project has minimal potential to impact water supply resources.

14.13.2 *Terrestrial Wildlife and Habitat*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14.13.3 Air Quality

[REDACTED]

BESS are an integral component of the electrical infrastructure needed to meet the Commonwealth's emission reduction goals, including the Commonwealth's net zero by 2050 greenhouse gas (GHG) emission reduction target established pursuant to the Global Warming Solutions Act (GWSA). According to DOER's and MassCEC's report *Charging Forward: Energy Storage In a Net Zero Commonwealth*,¹² "energy storage can support increased intermittent renewable generation through renewable energy firming and the reduction of emissions in the electric sector." As renewable energy generation in New England increases, energy storage projects will increasingly be able to charge from clean power off-peak and displace emitting generation (i.e., oil and gas generating facilities) during daily peak periods. Displacing GHG emissions from oil and

¹² See: <https://www.mass.gov/guides/charging-forward-energy-storage-in-a-net-zero-commonwealth>.

gas facilities will help mitigate the effects of climate change, such as more frequent and dangerous storms, severe heat waves and drought, sea level rise and increased flooding, ocean acidification, changes in agricultural productivity, shifts in species' distributions, and increases in energy system costs. It will also reduce regional emissions of harmful air pollutants such as nitrogen oxides (NO_x), sulfur dioxide (SO₂), and fine particulate matter (PM_{2.5}), which are linked to health conditions such as early death, heart attacks, respiratory disorders, stroke, and asthma and contribute to acid rain and ground-level ozone/smog.

Nevertheless, the construction of the Project will result in temporary and localized air emissions from vehicles and construction equipment. Preliminary measures to minimize and mitigate potential air quality impacts from vehicles and construction equipment used during the Project include:

- implementing BMPs to minimize airborne dust, such as covering dump trucks, stabilizing or covering soil stockpiles, installing anti-tracking pads at roadway egress points, regular roadway sweeping, and using water trucks with misters (as necessary) to suppress dust in active work areas;
- using ultra-low sulfur diesel (ULSD) fuel in diesel-powered construction equipment;
- complying with Massachusetts anti-idling regulations (310 CMR 7.11(1)(b)), which limit vehicle idling to five minutes (except where specific regulatory exceptions apply); and
- requiring diesel-powered non-road construction equipment rated at 50 horsepower or greater and used for 30 or more days to be certified to meet EPA Tier 4 emission standards or have EPA-verified emission control technologies, where applicable.

14.13.4 Human Environment

14.13.4.1 Noise Impacts

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14.13.4.2 Visual Impacts

[REDACTED]

[REDACTED]

14.13.4.3 Traffic Impacts

[REDACTED]

[REDACTED]

14.13.4.4 Electric and Magnetic Fields



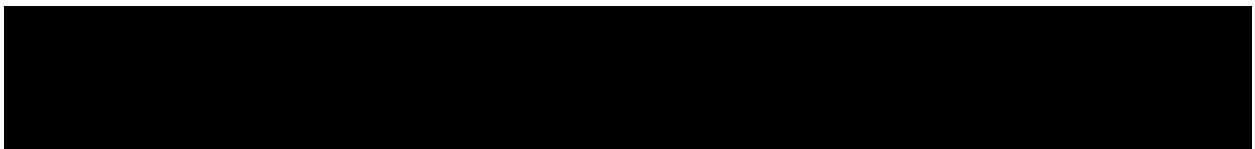
14.13.4.5 Impacts to Cultural and Historic Resources



14.14 EJ and Host Community Benefits and Impacts

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.

14.14.1 Host Communities and EJ Populations Near the Project



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

[REDACTED]

[REDACTED]

14.14.2 *Benefits and Avoidance, Minimization, and Mitigation of Potential Impacts to Host Communities and [REDACTED] EJ Populations*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



15 Exception to Form Long-Term Contract

15.1 Form Long-Term Contract Redlines

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.

Comments on and requested changes to the Form Long-Term Contract are provided in a redline format as Attachment 15-1 (National Grid) and Attachment 15-2 (Eversource/Unitil).