

Findings Solving Report Regarding:

Generation Audit of American Kings Solar (American Kings) - Audit Number GA2024-04AKS

The purpose of this report is to provide the CPUC with a clear and precise response to the findings identified during the Generation Audit of American Kings Solar (American Kings) - Audit Number GA2024-04AKS. Below are the findings of the Generation Audit and a plan of action for each of the findings reported as in need of corrective actionn:

Finding 1: The flammable storage cabinet outside of the Operation & Maintenance (O&M) building does not properly store and identify the hazards of the stored materials.

• The flammable storage cabinet has been replaced with one that has a self-closing door. Additionally, NFPA diamond labels were ordered on 6/5/24 to correctly identify the contents of the cabinet. Order details in exhibit A.

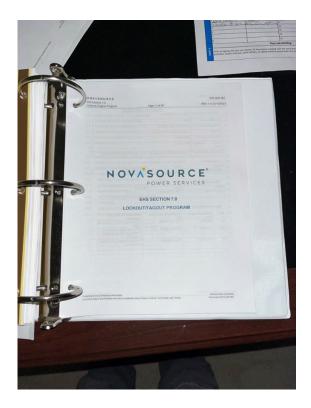
Finding 2: American Kings' physical security needs improvement.

• The gate will be locked after every entry and exit of the site. Additionally, an extra gate and fence to allow separate entrances to the office and the site are being considered as additional security measures.

Finding 3: The hardcopy of the Lock Out Tag Out (LOTO) Procedure in the O&M building was not updated with the 2023 version.

• The latest version of the LOTO procedure is now available in physical copy onsite. Below is a picture showing the updated 12/12/2023 version on site.





Finding 4: The plant must continuously maintain and replace deteriorated danger and hazard signage.

• New "Danger Arc Flash" stickers were ordered on 6/5/2024. Old labels will be replaced during weekly rounds. Order details on exhibit A.

Finding 5: Various cable inspections and corrective maintenance in the solar array areas need improvement.

• Attention has been focused on resolving the identified wire management issues, and weekly rounds are being conducted to identify and correct any other wire management issues. Additionally, a robot service has been implemented on site with daily missions where cable management issues can be also found and a ticket for resolution created accordingly.

Finding 6: Several inverter control panel covers and pins are broken.

• The replacement of control panels is ongoing, and additional quotes have been requested from the inverter manufacturer in order to create additional spare parts.

Finding 7: An active bird nest was found in the switchyard.

• The site team has noted this and continues to monitor any hazards it may present to the nest or the site. The nest will be removed at the end of the nesting season.



Finding 8: During the inspection of Conex storage containers, empty boxes and waste materials were found stored inside.

• The site team has removed all empty boxes, cardboard, and loose material from all storage areas. Waste management plan ongoing. Below is a photo showing the current state of the storage area.



Finding 9: The plant lacks sufficient upkeep of Work Order status tracking, completion, and closeout.

• NSPS now has a work order audit system in place where all work orders are reviewed by another team to ensure thorough follow-up. All work order history has been made available and reviewed for completion.

Observation 1: The speed limit is not posted at the main gate into the O&M yard.

• 10 MPH speed limit signs have been ordered. We expect to receive them on July 1st and they will be installed at the entrance gates.

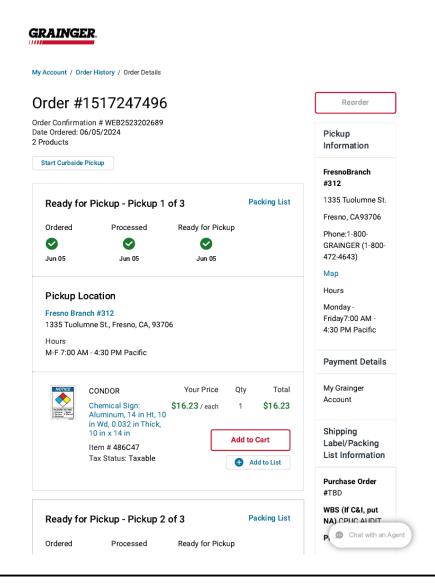
Summary:



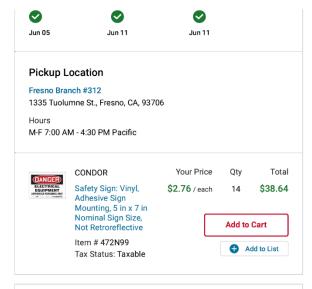
All findings have been addressed. Those that have not yet been fully resolved have a defined resolution plan in place and are being actively worked on.

EXHIBIT A.

Labels order details:







Department10718
0&M OPS US
Attention EGWARD
ROMERO
Was Ship Address
Updated? YES

Order Summary

Subtotal \$584.46
Tax \$48.81
Estimated Standard
Shipping
Not Available
Estimated Other
shipping
N/A
Total \$633.27

Reorder

Packing List Ready for Pickup - Pickup 3 of 3 Ordered Processed Ready for Pickup \odot Jun 05 Jun 06 Jun 06 **Pickup Location** Fresno Branch #312 1335 Tuolumne St., Fresno, CA, 93706 M-F 7:00 AM - 4:30 PM Pacific Your Price CONDOR Qty Total Chemical Sign: \$16.23 / each Aluminum, 14 in Ht, 10 in Wd, 0.032 in Thick, \$16.23

Item # 486C47

Chat with an Agent



