

**CPUC AUDIT FINDINGS OF
EDWARDS SANBORN SOLAR AND
BATTERY ENERGY STORAGE
APRIL 21 – APRIL 24, 2025
RESPONSE**

Finding 1: Edwards Sanborn Solar and Battery Energy Storage (Edwards Sanborn) must improve the work order management system used for substation maintenance activities.

Edwards Sanborn high voltage substation maintenance team has implemented an interim platform utilizing a tracking and notification system that supports planning, execution, and recordkeeping in the platform while the CMMS system is being finalized. Please see submitted interim platform report. CMMS platform to go live by the end of Sept 2025. Finding to be closed at go-live date.

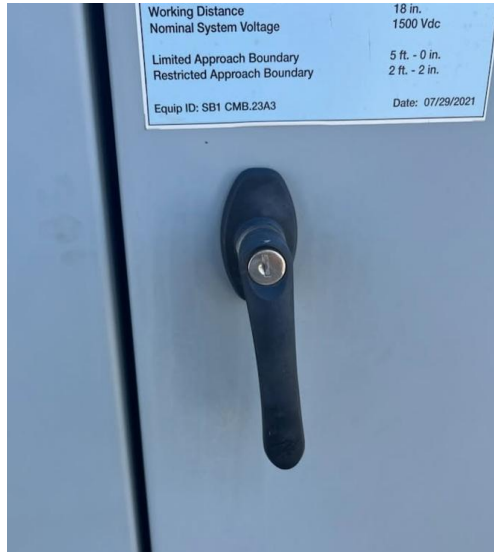
Finding 2: Edwards Sanborn must improve documentation control and standardize data collection practices for high voltage substation activities.

Edwards Sanborn high voltage team has reformatted and standardized the inspections checklists. This will ensure that staff records are consistent. They have also streamlined data entry to strengthen documentation control, and standardized data entry formats. All data will be stored in the CMMS that will be implemented once finalized. Please see submitted interim inspection checklist. Finding closed 5/15/25.

Finding 3: ESRB inspectors observed out-of-date tags on operational equipment.

Edwards Sanborn, along with the O&M provider, recognizes the operational and safety risk this presents and the seriousness of this item. As mentioned in the report, the documentation was reviewed by Plant and ESRB staff, and it was verified that day by all teams that the unit had been properly cleared for return to service per site procedures. The tag was removed.

The O&M provider has completed retraining of the site personnel to include the individuals involved. The O&M has also completed an audit of their LOTO procedure, including any open LOTO's. Finding closed on 4/28/25.



Finding 4: Edwards Sanborn must update the Spill Prevention, Control, and Countermeasure (SPCC) plan to accurately reflect the location of the operations building.

Edwards Sanborn has revised the SPCC map to reflect the current configuration of the site and all relevant structures. The operations building is not included since it is not located on site. The revised SPCC plan has been resubmitted for review and verification, to include the updated maps. Finding closed 7/25/25.

Finding 5: ESRB inspectors found expired inventory in the first-aid kit of the main operation building.

Edward Sanborn inspected all first aid kits including the first aid kit in the main operations building and ordered all expired inventory the day it was identified during the audit. All items were placed in the first aid kit upon arrival. All first aid kits at Edwards Sanborn have been and continue to be routinely inspected to ensure that the kits contain their proper inventory and that any medication, salve, etc. is swiftly ordered and replaced prior to its expiration. All items with an expiration date have been labeled on the front of that units box or on the kit for quick easy identification. The last item was completed and finding closed on 5/6/25.



Finding 6: ESRB inspectors observed emergency exit lights at the substation that did not illuminate when tested.

As mentioned in the report, during the audit, Edwards Sanborn was able to rectify the issues with the substation emergency exit lights showing ESRB inspectors that they were operational and identifying the issue as a connection problem that occurred during construction. Edward Sanborn has revised the substation monthly inspection checklist to include emergency light testing to ensure they are in proper working condition. This includes monthly functional testing, annual comprehensive functional testing and establishes written records of all inspection and tests. While Edward's Sanborn establishes the CMMS system (ETA: Sept 2025), in the interim the interim CMMS platform is being used for scheduled notifications, logging and historizing. This finding is closed 4/24/25.



Finding 7: ESRB inspectors observed fire extinguisher signs in and around the storage warehouse missing their associated fire extinguishers.

As reported, this was due to a new leased building and the owner nor previous lessee had not removed this signage. It was not in a correct location for Edwards Sanborn daily use. During the audit, Edwards Sanborn staff rectified this finding by removing the inaccurate signage while maintaining the accurate signage of the fire extinguishers that were already in use. Finding closed 4/21/25.



Finding 8: Various fire extinguishers are missing monthly inspection tags.

Edwards Sanborn has worked with the warehouse team to ensure that all fire extinguishers are equipped with current monthly inspection tags (as of 4/21/25) and that personnel are completing monthly inspections, as required. Edwards Sanborn has established a digital monthly checklist that will track completion and any discrepancies of all inspections. It will automatically notify the party responsible of the discrepancy, for corrective actions. Finding was corrected and closed 4/21/25.



Finding 9: The site map does not identify muster points for the main operations building and surrounding structures.

Edwards Sanborn has revised and posted the evacuation maps for the main operations area that clearly identifies all muster points (primary / secondary) for the building and adjacent structures. They have also added an overhead view to the orientation that includes the primary and secondary muster points. Finding was corrected and closed 5/2/25.



Finding 10: Edwards Sanborn must update the Emergency Response Plan (ERP) contact list and ensure all posted ERP documents reflect the revised information.

Edwards Sanborn updated the contact list and ensured all ERP documents posted throughout the facility reflect the revised information. Revised document has been uploaded for review and verification. Finding was corrected and closed 07/28/25.

Finding 11: Edwards Sanborn did not maintain a copy of the ERP in the site's fire alarm control cabinet as required.

Edwards Sanborn has placed a current copy of the ERP in the fire alarm control cabinet. Please see submitted photographic documentation of completion. The absence of the ERP in this location would not delay access to critical response information during an emergency since Edwards Sanborn has previously provided this information to the fire depts and it is kept digitally in their system for remote use, as needed. Revised 4/29/25, installed in FACP 4/30/25. Finding was corrected and closed 4/30/25.



Finding 12: ESRB inspectors observed hazardous waste and gas cylinders improperly stored.

To address Finding 12 concerning the observation made on April 21, 2025, in which ESRB inspectors identified hazardous waste and compressed gas cylinders improperly stored behind the site's storage warehouse, Terra-Gen's Site Management and EHS staff who were also in attendance provided the following explanation during the inspection:

Less than one month prior to the inspection, Terra-Gen had completed the relocation of its Mojave PV/BESS Operations office, which included the acquisition of an existing warehouse building. At the time of the inspection, the site-specific HMBP for the new office and warehouse location was in active development, including the preparation of a site diagram identifying designated hazardous materials storage areas. The HMBP was being prepared for submittal to the local CUPA (Kern County Public Health – Environmental Health Services Division).

Terra-Gen staff further explained that the materials observed were not part of the typical hazardous materials inventory used by Terra-Gen operating sites. It was believed that these materials were residual items left behind by a contractor following the completion of construction activities associated with the Edwards solar projects. When they were discovered in the field, personnel likely noted that the materials had not been stored in a location designated on the Edwards Solar & BESS HMBP. Acting under the assumption that the materials had been abandoned, and intending to temporarily secure them while the responsible contractor was identified, field personnel relocated the items to the new warehouse area until final determination and appropriate disposition or location reassignment could be made by Site Management.

Since the April 21st observation, Terra-Gen has completed and formally submitted the HMBP for the new operations office and warehouse to the local CUPA via the CERS database. The submittal has since been accepted by the local CUPA.

The finalized HMBP has been incorporated into the site-specific environmental compliance training program, and targeted communications have been issued across relevant departments to reinforce the following:

- Only designated and approved storage areas may be used for hazardous materials and waste.
- All handling and storage must be conducted in full compliance with applicable regulatory requirements and Terra-Gen's Corporate Handling and Storage of Hazardous Materials & Waste Program.
- Contractors are required to remove all of their materials off site once the contracted scope of work has been completed.
- Abandoned or unidentified materials must be reported immediately to the EHS staff and to Site Management for proper evaluation and management.

Terra-Gen remains committed to continuous improvement and regulatory compliance across all operational sites. Finding was corrected and closed 4/21/25.

