

August 12, 2025

VIA E-MAIL

Email: banu.acimis@cpuc.ca.gov

Banu Acimis, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: General Order 167-C Confidentiality Claim

Dear Ms. Acimis:

As you know, the staff of the Electric Safety and Reliability Branch (ESRB) of the Commission's Safety and Enforcement Division (SED) has conducted an audit of the Ivanpah Solar Generating Station (Audit Number GA2025-011S). NRG Energy Services, LLC ("NRG Energy Services") operates the Ivanpah plants on behalf of the owners of each Unit: Solar Partners I, Solar Partners II and Solar Partners VII. NRG Energy Services submitted its Follow-up Response to the Audit Findings and supporting attachments earlier today. NRG Energy Services respectfully requests protection of certain portions of the Follow-up Response and supporting attachments (the Confidential Materials) from public disclosure, and in this letter NRG Energy Services formally and respectfully requests the Commission not to disclose the Confidential Materials to the public.

The specific information in the Follow-up Response that requires protection from public disclosure is indicated on the attached redacted version of the Follow-up Response. The attachments consist of (1) new photographs of facilities that correspond to photographs that were previously the subject of NRG Energy Services' confidentiality request and (2) documents describing specific repairs to facilities at the Ivanpah plants. All of the photographs should be protected, and because of the difficulty of redacting sensitive information that is pervasive in the documents in the attachment, NRG Energy Services respectfully asks for confidential treatment of all of the materials in the attachments. ESRB was provided a link to the unredacted attachments with today's submission.

In addition, NRG Energy Services respectfully requests that certain information in ESRB's "Audit Report Response-Follow Up," delivered on July 11, 2025, should also be confidential.

NRG Energy Service's Follow-up Response quotes the specific requests presented in the Audit Report Response -Follow Up, and the attached version of the Follow-up Response indicates the information that should be included in the Confidential Materials and withheld from public disclosure.

NRG Energy Services and the Ivanpah staff have responded candidly and thoroughly to the questions of the auditors throughout the audit process. NRG Energy Services continues to believe that the Commission and the public are better served if ESRB and the Generator Asset Owners (GAOs) can communicate freely and candidly concerning the topics of General Order (GO) 167. The Confidential Materials at times address some highly technical aspects of the plant's operation and maintenance, and these technical points could be misunderstood or distorted in the simplified summaries that might appear in the press or other media. If the goal of the GO 167 program is to ensure the reliability of California's generating units through improved operation and maintenance practices, the ability of plant employees and ESRB auditors to speak freely, without the concern that reports of their discussions will be distorted or sensationalized, will further that goal. There should be no reluctance by ESRB to make critical observations in its audit reports, and no reluctance by the GAOs to respond fully to those observations. The prospect of public disclosure and resulting misperceptions could have a chilling effect on these communications.

The following legal provisions authorize protection of the Confidential Materials from public disclosure.

First, much of the information in the Confidential Materials is Critical Energy Infrastructure Information (CEII). After the terrorist attack of September 11, 2001, the Federal Energy Regulatory Commission (FERC) acted quickly to no longer make information or documents that "detail the specifications of energy facilities" available to the public.¹ The sniper attack on the Metcalf Substation in 2013 underscored the need to protect sensitive information about California's energy infrastructure. As relevant to the Audit Findings and the Follow-up Response, FERC defines CEII as "specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; . . . and (4) does not simply give the general location of the critical infrastructure."² Although the definition and regulation of CEII have been developed by FERC, the Commission and SED should also be concerned about the public release of any information that could be useful to anyone planning an attack on the Ivanpah facility or other energy facility. For that reason, NRG Energy Services requests protection of information in the Follow-up Response and the attachments, which include photographs and descriptions, that reveal the details of specific facilities or components of the Ivanpah plant.

Second, some of the CEII in the Confidential Materials is also commercially sensitive and is protected by the Trade Secret privilege of Evidence Code section 1060 and Civil Code section

¹ *Statement of Policy on Treatment of Previously Public Documents*, 97 FERC ¶61,030, Oct. 11, 2001.

² Order No. 683, Sept. 21, 2006, p. 4.

3426.1. The information in question derives independent economic value from not being generally known to the public, and NRG Energy Services has maintained the secrecy of this information. Because the Ivanpah plant participates in the competitive energy markets developed by the California Independent System Operator, if this information were made public, Ivanpah's competitors and potential buyers of the power generated by the plant could gain insights into the timing of outages at the plant and could use this information to distort competitive markets. Release of the information identified above as CEII could also give competitors and potential power buyers insight into the operational vulnerabilities of the Ivanpah plant. For example, information in the attachments could give market participants information about when the Ivanpah units would not be operating or participating in the energy markets, which could at times affect market prices. For that reason, this information is also competitively sensitive and should be protected from public disclosure.

Third, to the extent the Commission relies on the provisions of 16 U.S.C. § 824(g) to obtain information from Ivanpah Solar in its role as an Exempt Wholesale Generator under federal law, the Commission "shall not publicly disclose trade secrets or sensitive commercial information."³ As discussed above, passages of the Confidential Materials contain information qualifying as trade secrets under state law and other sensitive commercial information.

Fourth, the California Public Records Act provides an express protection from disclosure that would otherwise be required by that Act for "records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege."⁴ As discussed above, passages of the Confidential Materials contain privileged trade secrets under Evidence Code section 1060 and are similarly protected by applicable provisions of federal law.

In addition, the Commission can protect the Confidential Materials from public disclosure by asserting the Official Information privilege established in Evidence Code section 1040. That section allows a public entity like the Commission to refuse to disclose "information acquired in confidence by a public employee in the course of his or her duty" if "there is a necessity for preserving the confidentiality of the information that outweighs the necessity for disclosure in the interest of justice."⁵ Although the public has a general right to information about the Commission's activities, the need to protect CEII and competitively sensitive information and to safeguard the fair and efficient operation of competitive markets outweighs the need for public disclosure of this specific information. Furthermore, the Official Information privilege also applies when "disclosure is forbidden by an act of the Congress of the United States or a statute of this state."⁶ Disclosure of the sensitive passages of the Confidential Materials is prohibited by the Trade Secret privilege of Evidence Code section 1060 and may also be barred by federal statutes governing sensitive commercial information of Exempt Wholesale Generators, as discussed above. The Commission is clearly authorized to assert the Official Information privilege to protect the identified passages against disclosure.

³ 16 U.S.C. § 824(g)(2).

⁴ Cal. Gov't Code, § 7927.705.

⁵ Evid. Code, § 1040(a), (b)(2).

⁶ Evid. Code, § 1040(b)(1).

In compliance with GO 167-C § 14.4.3, NRG Energy Services provides the following information.

Information to be kept confidential: The information that should be kept confidential is indicated by the redactions in the attached redacted version of the Follow-up Response. NRG Energy Services also respectfully requests that all of the attachments that were conveyed in the link provided by email earlier today should be kept confidential.

Length of time the information should be kept confidential: The bulk of the confidential materials should be kept confidential at least until the audit process and any subsequent Commission process are completed. CEII and Trade Secret information should remain confidential until the plant is retired, and NRG Energy Services respectfully asks that this information be kept confidential for the full two years permitted under section 14.4.4 of GO 167-C, subject to renewal of this request at the end of the two-year period.

Specific provisions that prohibit disclosure: As discussed in this letter, the cited FERC opinions and orders on CEII, Evidence Code section 1040, Evidence Code section 1060, Civil Code section 3426.1, and 16 U.S.C. section 824(g) provide the legal bases for this request.

Specific privilege that the GAO may assert: The Trade Secret privilege of Evidence Code section 1060 and Civil Code section 3426.1.

Specific privilege that the Commission may assert: The Official Information privilege of Evidence Code section 1040 and the provisions of GO 66-D and GO 167-C. As discussed above, the need to protect CEII and commercially sensitive information outweighs the need to make this information available to the public.

Will the GAO object if the information is disclosed in an aggregated format? The specific information in the Confidential Materials does not seem suitable for aggregation, but NRG Energy Services is willing to discuss with ESRB possible release of aggregated information.

Maintenance of confidentiality: Some of the commercially sensitive information is based on confidential communications between NRG Energy Services and its commercial counterparties. Other than that disclosure, NRG Energy Services has not and will not disclose this information to anyone other than its attorneys, under the attorney-client privilege, and ESRB and its auditors.

NRG Energy Services submits this request in the spirit of cooperation with the Commission and its staff, in good faith, and in the belief that protecting Confidential Materials in the exhibits from disclosure will further the goals of GO 167-C.

Please feel free to contact me if you have any questions about this request.

Sincerely,

DOWNEY BRAND LLP


Brian Cragg

cc: Emmanuel Salas, emmanuel.salas@cpuc.ca.gov
GO167@cpuc.ca.gov

Attachment: Redacted version of Follow-up Response

5097992.1

ATTACHMENT

August 12, 2025

Emmanuel Salas
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, Ca 94102-3298

SUBJECT: Generation Audit Ivanpah Solar Generating Station
 Audit Number GA2025-01IS

Dear Mr. Salas:

Attached please find the Response Follow Up of NRG Energy Services LLC (“NRG Energy Services”) to the Audit Findings of Ivanpah Solar Generation Station, received on July 11, 2025. NRG Energy Services operates the Ivanpah plants on behalf of the owners of each Unit: Solar Partners I, Solar Partners II, and Solar Partners VII.

NRG Energy Services is committed to full compliance with the requirements of the CPUC, including General Order 167-C, which took effect on March 13, 2025, and to operating and maintaining the Ivanpah plant safely and reliably. I appreciate your consideration of NRG Energy Services’ Response Follow Up. Please let me know if you have any questions or require additional information.

Sincerely,

/s/ John Robertson

Vice President, NRG Energy Services
John.Robertson@nrg.com

**RESPONSE FOLLOW UP TO THE CPUC AUDIT FINDINGS OF IVANPAH
SOLAR GENERATING STATION
JANUARY 27-31, 2025
(AUDIT NUMBER GA2025-01IS)**

August 12, 2025

FOLLOW UP RESPONSE TO FINDINGS

Finding 13: ESRB inspectors observed multiple active equipment alarms and faults.

Item 1: The [REDACTED] is displaying two supervisory alarms and four trouble alarms.

1) Please provide a photograph of the fire alarm panel in the [REDACTED] displaying no active alarms.

Response: All alarms in the [REDACTED] except one have been resolved. NRG Energy Services currently has Siemens Fire scheduled to address the remaining alarm by the end of August 2025.

- See attached photograph titled Finding 13 Item 1.jpg for updated picture

Item 2: The [REDACTED] is displaying a trouble alarm due to a communication fault (Comm Fault 2).

2) Please provide a photograph of the [REDACTED] demonstrating that the alarm has been cleared.

Response: Siemens Fire completed a site survey in July 2025 of the [REDACTED]. While there is an active alarm, Siemens has put together a plan to repair the alarm, with an expected completion time of 3 to 6 months. The delay in completion is due to constraints with obtaining the materials for the repair and scheduling Siemens under NRG Energy Services' services contract.

- See attached photograph titled Finding 13 Item 2nc.jpg for updated picture

Item 3: The [REDACTED] is displaying a trouble alarm for battery replacement on the [REDACTED]

3) Please provide a copy of work order Notification #10411605 and a photograph of the completed work if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 2 is January of 2026. Note that Notification #10411605 was used to repair the battery in the [REDACTED] per NRG Energy Services' earlier response, but Notification #10411166 and its associated work order will be used to replace the [REDACTED] battery backup at that time. This additional Notification and work order is necessary to solve the issue related to the trouble alarm.

- See work order attachment titled Finding 13 Item 3 IP

Item 4: The [REDACTED] is indicating a breaker fault alarm on CKT6.

4) Please provide a copy of work order Notification #10411602 and a photograph of the completed work on the [REDACTED] if the work has been completed.

Response: Work requested by Notification #10411602 and its associated work order is in progress. NRG Energy Services is troubleshooting to determine the root cause of the breaker fault alarm.

- See attached photograph titled Finding 13 Item 4.jpg
 - Note that because the [REDACTED] is not active during the summer months, the photograph does not show an active alarm
- See work order attachment titled Finding 13 Item 4 IP

Item 5: The [REDACTED] currently displays an open limit alarm with a battery flat condition.

5) Please provide a copy of work order Notification # 10411609 and a photograph of the completed work on the [REDACTED] if the work has been completed.

Response: Work requested by Notification #10411609 and its associated work order for the flat battery condition has been completed. NRG Energy Services is working to resolve the open limit alarm with completion expected at the end of August 2025. See attached photograph titled Finding 13 Item 5 nc.jpg

- See work order attachment titled Finding 13 Item 5A IP
- See work order attachment titled Finding 13 Item 5B IP

Item 6: The [REDACTED] currently displays a trouble alarm for a configuration process failure on the [REDACTED]

6) Please provide a photograph of the [REDACTED] demonstrating that the alarm has been cleared.

Response: The [REDACTED] has been cleared of all alarms.

- See attached photograph titled Finding 13 Item 6.jpg

Item 7: The [REDACTED] currently displays two trouble alarms on the [REDACTED]

7) Please provide a photograph of the [REDACTED] demonstrating that the alarm has been cleared.

Response: The [REDACTED] has been cleared of all alarms.

- See attached photograph titled Finding 13 Item 7.jpg

Item 8: The [REDACTED] protection relay has an RTD failure alarm.

8) Please provide a copy of work order Notification #10411597 and a photograph of the completed work on the [REDACTED] protection relay if the work has been completed.

Response: Work requested by Notification #10411597 and its associated work order has been completed. The [REDACTED] protection relay RTD failure alarm has been repaired.

- See attached photograph titled Finding 13 Item 8.jpg
- See work order attachment titled Finding 13 Item 8 WC

Item 9: The [REDACTED] currently displays alarms on the [REDACTED] Cabinet loopback sensors.

9) Please provide a copy of work order Notification #10411598 and a photograph of the completed work on the [REDACTED] loopback alarm if the work has been completed.

Response: Work requested by Notification #10411598 and its associated work order has been completed. The [REDACTED] loopback alarm sensors have been repaired.

- See attached photograph titled Finding 13 Item 9.jpg
- See attachment for work order titled Finding 13 Item 9 WC

Item 10: The [REDACTED] transformer currently has an active alarm on the [REDACTED] unit.

10) Please provide a copy of work order Notification #10410794 and a photograph of the completed work on the [REDACTED] transformer DGA alarm if the work has been completed.

Response: This repair requires a unit outage. At the time of the audit, NRG Energy Services was unaware of the scope needed to repair the [REDACTED] alarm. Once the alarm driver was fully understood, NRG Energy Services determined that an outage would be necessary to perform the repair. NRG Energy Services gives scheduling priority to matters that concern employee or plant safety. Currently, NRG Energy Services' earliest Planned Outage for Unit 1 is January of 2026. Notification #10410794 and its associated work order will be used for the [REDACTED] transformer repair at that time. A power factor test and full package analysis will be conducted by Hampton Tedder, or another qualified vendor.

- See work order attachment titled Finding 13 Item 10 IS
- See attached photograph titled Finding 13 Item 10 nc.jpg

Item 11: The [REDACTED] currently has two breaker trips on [REDACTED]

11) Please provide a copy of work order Notification #10374856 and a photograph of the completed work on the [REDACTED] alarm on [REDACTED] if the work has been completed.

Response: Work requested by Notification #10374856 and its associated work order is still in progress. The [REDACTED] is not active in the summer. Therefore,

repairs to the [REDACTED] will be completed as part of NRG Energy Services' routine Winter Readiness program that is due by November 1, 2025.

- See attached photograph titled Finding 13 Item 11.jpg
 - Note that the photograph does not reflect an active alarm because the system is not operational in the summer months
- See work order attachment titled Finding 13 Item 11 IP

Finding 14: Evidence of water and steam leaks on various equipment in the Plant.

Note: In the June 2, 2025, Response and Corrective Action Plan, NRG Energy Services stated that the repairs listed under Finding 14 required an outage. Some repairs have been completed during forced outages or while the plant was in service, but other repairs will be made during the next planned outage.

Item 1: The [REDACTED] on both the north and west sides are leaking steam.

1) Please provide copies of work order Notifications #10411164 and #10411163, along with a photograph confirming the [REDACTED] steam leaks have been repaired, if the work has been completed.

Response: Work requested by Notifications #10411164 and 10411163 and their associated work orders was completed during the recent forced outage at Unit 2. The [REDACTED] steam leaks have been repaired.

- See attached photograph titled Finding 14 Item 1 fig 14 East lvl column.jpg
- See attached photograph titled Finding 14 Item 1 fig 15 West lvl column.jpg
- See work order attachments titled Finding 14 Item 1 WC and Finding 14 Item 1 DUP

Item 2: The [REDACTED] pressure sensing line has a leaking hose line.

2) Please provide a copy of work order Notification #10397069, along with a photograph confirming the [REDACTED] sensing line steam leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10397069 and its associated work order was completed during the recent forced outage at Unit 2. The [REDACTED] sensing line steam leak has been repaired.

- See attached photograph titled Finding 14 Item 2.jpg
- See work order attachment titled Finding 14 Item 2 IP

Item 3: The [REDACTED] valve is leaking steam.

3) Please provide a copy of work order Notification #10411601, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 2 is January of 2026. Notification #10411601 and its associated work order will be used to repair the [REDACTED] steam leak at that time. In the interim, the steam leak has been wrapped to divert steam away from the walking path as a safety precaution.

- See attached photograph titled Finding 14 Item 3.jpg
- See work order attachment titled Finding 14 Item 3 IP

Item 4: The [REDACTED] on the west side is leaking steam.

4) Please provide a copy of work order Notification #10411584, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 3 is February of 2026. Notification #10411584 and its associated work order will be used to repair the [REDACTED] steam leak at that time.

- See attached photograph titled Finding 14 Item 4 nc.jpg
- See work order attachment titled Finding 14 Item 4 IP

Item 5: The [REDACTED] is leaking steam.

5) Please provide a copy of work order Notification #10336751, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 3 is February of 2026. Notification #10336751 and its associated work order will be used to repair the [REDACTED] steam leak at that time.

- See attachment titled Finding 14 Item 5 nc.jpg
- See work order attachment titled Finding 14 Item 5 IP

Item 6: The [REDACTED] is leaking steam.

6) Please provide a copy of work order Notification #10411624, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 3 is February of 2026. Notification #10411624 and its associated work order will be used to repair the [REDACTED] steam leak at that time.

- See attached photograph titled Finding 14 Item 6 nc.jpg
- See work order attachment titled Finding 14 Item 6 IP

Item 7: The [REDACTED] has a valve leaking steam on [REDACTED]

7) Please provide a copy of work order Notification #10411640, along with a photograph confirming the [REDACTED] valve steam leak has been repaired, if the work has been completed.

Response: Note that Item 7 refers to a valve leak [REDACTED] but NRG Energy Services concludes that the valve leak at issue is [REDACTED]. This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 3 is February of 2026. Notification #10411640 and its associated work order will be used to repair the [REDACTED] valve steam leak at that time.

- See attached photograph titled Finding 14 Item 7 nc.jpg
- See work order attachment titled Finding 14 Item 7 IP

Item 8: The [REDACTED] valve is leaking.

8) Please provide a copy of work order Notification #10366495, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10366495 and its associated work order has been completed. The [REDACTED] steam leak has been repaired.

- See attached photograph titled Finding 14 Item 8.jpg
- See work order attachment titled Finding 14 Item 8 IP

Item 9: The [REDACTED] is leaking.

9) Please provide a copy of work order Notification #10411625, along with a photograph confirming the [REDACTED] leak has been repaired, if the work has been completed.

Response: The [REDACTED] leak was repaired during an operator's normal duties, therefore a Notification in NRG Energy Services' Work Management System was not issued

- See attached photograph titled Finding 14 Item 9.jpg

Item 10: The [REDACTED] is leaking water.

10) Please provide a copy of work order Notification #10407130, along with a photograph confirming the [REDACTED] leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10407130 and its associated work order has been completed. The [REDACTED] leak was stopped with a [REDACTED].

- See attached photograph titled Finding 14 Item 10.jpg
- See work order attachment titled Finding 14 Item 10 IP

Item 11: The [REDACTED] has a steam leak from valve.

11) Please provide a copy of work order Notification #10411628, along with a photograph confirming the [REDACTED] valve steam leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10411628 and its associated work order has been completed. The [REDACTED] steam leak has been repaired.

- See attached photographs titled Finding 14 Item 11a.jpg & Finding 14 Item 11b.jpg
- See work order titled Finding 14 Item 11 WC

Item 12: The [REDACTED] is leaking water.

12) Please provide a copy of work order Notification #10411626, along with a photograph confirming the [REDACTED] leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Notification #10411626 and its associated work order will be used during the Unit 3 Planned Mini Outage in October of 2025 to repair the [REDACTED] leak.

- See attached photograph titled Finding 14 Item 12 nc.jpg
- See work order attachment titled Finding 14 Item 12 IP

Item 13: An unidentified line on the [REDACTED] has an intense horizontal steam leak.

13) Please provide a copy of work order Notification #10411606, along with a photograph confirming the [REDACTED] horizontal steam leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10411606 and its associated work order has been completed. The [REDACTED] horizontal steam leak has been repaired.

- See attached photograph titled Finding 14 Item 13.jpg
- See work order attachment titled Finding 14 Item 13 WC

Item 14: The [REDACTED] steam valve on [REDACTED] is leaking.

14) Please provide a copy of work order Notification #10411607, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10411607 and its associated work order has been completed. The [REDACTED] steam leak has been repaired.

- See attached photograph titled Finding 14 Item 14.jpg
- See work order attachment titled Finding 14 Item 14 WC

Item 15: The [REDACTED] on the north side is leaking steam.

15) Please provide a copy of work order Notification #10411596, along with a photograph confirming the [REDACTED] steam leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10411596 and its associated work order has been completed. The [REDACTED] steam leak has been repaired.

- See attached photograph titled Finding 14 Item 15.jpg
- See work order attachment titled Finding 14 Item 15 WC

Finding 15: Evidence of oil leaks on various equipment in the Plant.

Note: In the June 2, 2025, Response and Corrective Action Plan, NRG Energy Services stated that some of the repairs listed under Finding 14 required an outage. These repairs will be made during the next planned outage, as indicated in some of the following responses.

Item 1: The [REDACTED] displays signs of an active oil leak.

1) Please provide a copy of work order Notification #10397282, along with a photograph confirming the [REDACTED] oil leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 2 is January of 2026. Notification #10397282 and its associated work order will be used to repair the [REDACTED] oil leak at that time.

- See attached photograph titled Finding 15 Item 1 nc.jpg
- See work order attachment titled Finding 15 Item 1 IP

Item 2: The [REDACTED] pump is leaking oil.

2) Please provide a copy of work order Notification #10411641, along with a photograph confirming the [REDACTED] oil leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10411641 and its associated work order has been completed. The [REDACTED] oil leak has been repaired.

- See attached photograph titled Finding 15 Item 2.jpg
- See work order attachment titled Finding 15 Item 2 IP

Item 3: A pump in the [REDACTED] which supplies [REDACTED] is leaking.

3) Please provide a copy of work order Notification #10411642, along with a photograph confirming the [REDACTED] oil leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 3 is February of 2026. Notification #10411642 and its associated work order will be used to repair the [REDACTED] oil leak at that time.

- See attached photograph titled Finding 15 Item 3.jpg
- See work order attachment titled Finding 15 Item 3 IP

Item 4: The [REDACTED] displays signs of an active oil leak.

4) Please provide a copy of work order Notification #10383858, along with a photograph confirming the [REDACTED] oil leak has been repaired, if the work has been completed.

Response: This repair requires a unit outage. Currently, NRG Energy Services' earliest Planned Outage for Unit 1 is January of 2026. Notification #10383858 and its associated work order will be used to repair the [REDACTED] oil leak at that time.

- See attached photographs titled Finding 15 Item 4 fig 33.jpg & Finding 15 Item 4 fig 34.jpg
- See work order attachment titled Finding 15 Item 4 WC

Item 5: The [REDACTED] Pump [REDACTED] has an active leak.

5) Please provide a copy of work order Notification #10298061, along with a photograph confirming the [REDACTED] pump oil leak has been repaired, if the work has been completed.

Response: Work requested by Notification #10298061 and its associated work order has been completed. The [REDACTED] pump oil leak has been repaired.

- See attached photograph titled Finding 15 Item 5.jpg
- See work order attachment titled Finding 15 Item 5 WC

Finding 16: ESRB inspectors identified multiple instances of damaged or malfunctioning equipment throughout the Plant.

Item 1: The lights on the [REDACTED] were not operational.

1) Please provide a photograph confirming the [REDACTED] lights have been repaired.

Response: Work requested by Notification #10411615 and its associated work order has been completed. All [REDACTED] lights have been repaired.

- See attached photograph titled Finding 16 Item 1.jpg
- See work order attachment titled Finding 16 Item 1 IP

Item 2: A lighting fixture was found full of water on the [REDACTED]

2) Please provide a photograph confirming the [REDACTED] lighting fixture have been repaired.

Response: Work requested by Notification #10397068 and its associated work order has been completed. The [REDACTED] lighting fixture has been repaired.

- See work order attachment titled Finding 16 Item 2 WC
- See attached photograph titled Finding 16 Item 2 nc.jpg

Item 3: A Lighting fixture [REDACTED] has a missing light with the wires dangling

capped with wire nuts.

3) Please provide a copy of work order Notification #10411249, along with a photograph confirming the [REDACTED] lighting fixture has been repaired, if the work has been completed.

Response: Work requested by Notification #10411249 and its associated work order is in progress. ITEC is currently on site finishing all remaining lighting repairs, with completion expected at the end of August 2025.

- See attached photograph titled Finding 16 Item 3 nc.jpg
- See work order attachment titled Finding 16 Item 3 IP

Item 4: [REDACTED] has a loose bolt holding up a cooling fan.

4) Please provide a photograph confirming the [REDACTED] fan loose bolt has been repaired.

Response: Work requested by Notification #10397281 and its associated work order has been completed. The [REDACTED] fan bolt has been tightened.

- See attached photograph titled Finding 16 Item 4.jpg
- See work order attachment titled Finding 16 Item 4 WC

Item 5: A junction box cover for a light in the [REDACTED] found loose and dangling.

5) Please provide a copy of work order Notification #10411609, along with a photograph confirming the [REDACTED] fixture has been repaired, if the work has been completed.

Response: Work requested by Notification #10411609 and its associated work order has been completed. The [REDACTED] lighting fixture has been repaired.

- See attached photograph titled Finding 16 Item 5.jpg
- See work order attachment titled Finding 16 Item 5 WC

Item 6: A lighting fixture was found non-operational on [REDACTED].

6) Please provide a copy of work order Notification #10411749, along with a photograph confirming the [REDACTED] lighting fixture has been repaired, if the work has been completed.

Response: Work requested by Notification #10411749 and its associated work order is in progress. ITEC is currently on site finishing all remaining lighting repairs, with completion expected at the end of August 2025.

- See attached photograph titled Finding 16 Item 6 nc.jpg
- See work order attachment titled Finding 16 Item 6 IP

Item 7: Fire alarm box was found broken off and wires capped inside the turbine room of Unit 3.

7) Please provide a copy of work order Notification #10402608, along with a photograph confirming the Unit 3 fire alarm box with broken wires has been repaired, if the work has been completed.

Response: Work requested by Notification #10402608 and its associated work order has been completed. The Unit 3 fire alarm box has been repaired.

- See attached photograph titled Finding 16 Item 7.jpg
- See work order attachment titled Finding 16 Item 7 IP

Item 8: A lighting fixture was found non-operational on [REDACTED]

8) Please provide a copy of work order Notification #10411271, along with a photograph confirming the [REDACTED] lighting fixture has been repaired, if the work has been completed.

Response: Work requested by Notification #10411271 and its associated work order has been completed. The [REDACTED] lighting fixture has been repaired.

- See attached photograph titled Finding 16 Item 8 nc.jpg
- See work order attachment titled Finding 16 Item 8 WC

Item 9: The [REDACTED] had a cracked temperature gauge in need of repair.

9) Please provide a copy of work order Notification #10411179, along with a photograph confirming the [REDACTED] temperature gauge has been repaired, if the work has been completed.

Response: Work requested by Notification #10411179 and its associated work order is in progress. Parts were identified on 5/9/25 and are on order. The [REDACTED] needs to be down for a unit outage, therefore the [REDACTED] temperature gauge is scheduled for repair during the Unit 1 Planned Outage in January of 2026.

- See attached photograph titled Finding 16 Item 9 nc.jpg
- See work order attachment titled Finding 16 Item 9 IP

Finding 20: ESRB inspectors observed damaged flammable material storage cabinets without self-closing mechanisms.

1) Please provide photographs of all the replaced flammable storage cabinets seen in figures 59, 61, and 62.

Response: The self-closing mechanisms have been repaired on the identified flammable storage cabinets.

- See attached photographs titled Finding 20 Item 1.jpg, Finding 20 Item 2.jpg, Finding 20 Item 3.jpg, Finding 20 Item 4 fig 62a.jpg, & Finding 20 Item 4 fig 62b.jpg

Finding 21: ESRB inspectors observed multiple emergency exit lights that did not

illuminate when tested or were in disrepair.

1) Please provide photographs of all the fixed emergency lights that were displayed in figures 63-72 demonstrating the fixtures are functional.

Response: All emergency exit lights identified have been repaired.

- See attached photographs titled Finding 21 Item 1, Item 2 & Item 3 fig 66.jpg, Finding 21 Item 3 fig 67.jpg, Finding 21 Item 3 fig 68.jpg, Finding 21 Item 3 fig 69.jpg, Finding 21 Item 3 fig 70.jpg, Finding 21 Item 3 fig 71.jpg, & Finding 21 Item 3 fig 72.jpg

Finding 23: ESRB inspectors observed damaged insulation across the Plant.

Item 1: Insulation on [REDACTED] is missing insulation.

1) Please provide a copy of work order Notification #10411748, along with a photograph confirming the [REDACTED] missing insulation has been repaired, if the work has been completed.

Response: Work requested by Notification #10411748 and its associated work order has been completed. The [REDACTED] insulation has been installed.

- See attached photograph titled Finding 23 Item 1.jpg
- See work order attachment titled Finding 23 Item 1 IP

Item 2: Insulation on [REDACTED] unit two has damaged insulation.

2) Please provide a copy of work order Notification #10411734, along with a photograph confirming the [REDACTED] damaged insulation has been repaired, if the work has been completed.

Response: Work requested by Notification #10411734 and its associated work order has been completed. The [REDACTED] has been repaired.

- See attached photograph titled Finding 23 Item 2 nc.jpg
- See work order attachment titled Finding 23 Item 2 WC

Item 3: The [REDACTED] elbows have damaged insulation in need of repair.

3) Please provide a copy of work order Notification #10411733, along with a photograph confirming the [REDACTED] elbow damaged insulation has been repaired, if the work has been completed.

Response: Work requested by Notification #10411733 and its associated work order has been completed. The [REDACTED] elbow insulation has been repaired.

- See attached photograph titled Finding 23 Item 3.jpg
- See work order attachment titled Finding 23 Item 3 WC

Item 4: Insulation on the [REDACTED] is damaged.

4) Please provide a copy of work order Notification #10411732, along with a photograph confirming the [REDACTED] damaged insulation has been repaired, if the work has been completed.

Response: Work requested by Notification # 10411732 and its associated work order has been completed. The [REDACTED] insulation has been repaired.

- See attached photograph titled Finding 23 Item 4.jpg
- See work order attachment titled Finding 23 Item 4 WC

Item 5: Insulation on the [REDACTED] is missing a segment.

5) Please provide a copy of work order Notification #10411752, along with a photograph confirming the [REDACTED] missing insulation has been repaired, if the work has been completed.

Response: Work requested by Notification #10411752 and its associated work order has been completed. The [REDACTED] insulation has been repaired.

- See attached photograph titled Finding 23 Item 5.jpg
- See work order attachment titled Finding 23 Item 5 WC

Finding 27: ESRB inspectors observed improper housekeeping.

Item 3: [REDACTED] poses a tripping hazard due to the remaining equipment from construction. Ivanpah must ensure that any trip hazards are clearly marked or not accessible by Plant staff.

1) Please provide details on how the tripping hazard will be addressed.

Response: Permanent fences have been installed to address the tripping hazard due to remaining construction equipment.

- See attached photograph titled Finding 27 Item 3.jpg