PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 25, 2025

Joe Moura
Plant Manager
Marsh Landing Generating Station
Antioch, CA 94509

SUBJECT: **Generation Audit of Marsh Landing Generating Station Audit Number GA2025-02MH**

Dear Mr. Moura:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Christopher Villalobos, Ryan Hart, and Ian Rawnsley of ESRB staff conducted a generation audit of Marsh Landing Generating Station, from April 21 through April 24, 2025.

During the audit, ESRB observed plant operations, inspected equipment, reviewed data, interviewed plant staff, and identified potential violations of General Order (GO) 167-C. A copy of the audit findings itemizing the violations is attached. Please advise me by email no later than August 22, 2025, by providing an electronic copy of all corrective actions and preventive measures taken and/or planned to be taken to resolve the violations.

Your response should include a Corrective Action Plan with a description and completion date of each action and measure completed. For any violations not corrected, please provide the projected completion dates to correct the violations and to achieve full compliance with GO 167-C.

Please submit your response to Christopher Villalobos at Christopher.Villalobos@cpuc.ca.gov. Please note that although Marsh Landing Generating Station has been given 30 days to respond, it has a continuing obligation to comply with all applicable GO 167-C requirements; therefore, the response period does not alter this continuing duty.

CPUC intends to publish the audit report of Marsh Landing Generating Station on the CPUC website. If you wish to make a claim of confidentiality covering any of the information in the report, you may submit a confidentiality request pursuant to Section 14.4 of GO 167-C, using the heading “General Order 167-C Confidentiality Claim" along with such redactions. The request and redacted version of the audit report should be sent to Christopher Villalobos with a copy to me and the GO 167 inbox GO167@cpuc.ca.gov by August 22, 2025.

Please note that ESRB will also post Marsh Landing Generating Station’s audit report response on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a redacted version of your audit response that can be posted on the CPUC website.

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Thank you for your courtesy and cooperation throughout the audit process. If you have any questions concerning this audit, please contact Christopher Villalobos at Christopher.Villalobos@cpuc.ca.gov or (916) 268-7732.

Sincerely,

Banu Acimis, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Attachment: CPUC Generation Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Safety and Enforcement Division, CPUC
Stephen Hur, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Ryan Hart, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Christopher Vilalobos, Utilities Engineer, ESRB, SED, CPUC
Ian Rawnsley, Utilities Engineer, ESRB, SED, CPUC

CPUC Audit Findings of
Marsh Landing Generating Station
April 21-24, 2025

I. Findings Requiring Corrective Action

Finding 1: High priority work orders must be tracked.

General Order (GO) 167-C, Appendix A, Logbook Requirements states in part:

> *"In lieu of logging outstanding maintenance activities, a work order management system or electronic database system may be utilized at the discretion of the GAO or ESSO to track maintenance activities and status. This method of recordkeeping is intended to keep track of maintenance records according to maintenance requirements of original equipment manufacturers or industry best practices. Information in the work order management shall include the following but is not limited to:*
>
> - *Equipment issue;*
> - *Work order tracking number;*
> - *Date and time the work order was issued and completed;*
> - *Names of persons who created, approved work orders and performed the work;*
> - *Maintenance requirement (e.g., OEM recommendation, Non Destructive Examination, Post heat treatment, etc.);*
> - *Maintenance activities performed;*
> - *Parts and tools information;*
> - *Job safety and environmental analysis information; and*
> - *Permit information such as hot work, confined space entry, etc."*

GO 167-C, Appendix C, Maintenance Standard (MS) 2: Organizational Structure and Responsibilities states:

> *"The organization with responsibility and accountability for establishing and implementing a maintenance strategy to support company objectives for reliable facility operation is clearly defined, communicated, understood, and is effectively implemented. Reporting relationships, control of resources, and individual authorities support and are clearly defined and commensurate with responsibilities."*

GO 167-C, Appendix C, MS 3: Maintenance Management and Leadership states:

> *"Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities."*

GO 167-C, Appendix D, Operation Standard (OS) 16: Participation by Operations Personnel in Work Orders states:

> *"Operations personnel identify potential system and equipment problems and initiate work orders necessary to correct system or equipment problems that may inhibit or prevent facility operations. Operations personnel monitor the progress of work orders*

affecting operations to ensure timely completion and closeout of the work orders, so that the components and systems are returned to service."

During the audit, Electric Safety and Reliability Branch (ESRB) inspectors reviewed Marsh Landing Generating Station's, the Plant, work management practices, which uses a computer-based maintenance management system (CMMS). Within the CMMS, the work is assigned priorities based on the urgency or impact of the maintenance activity. The Plant does not track the highest priority maintenance, "Fix-It Now", in the CMMS. These critical maintenance activities are the most impactful items that can affect Plant safety and resource availability. The Plant stated these items are not tracked due to their urgency, allowing for priority to be given to the work, rather than to the documentation. The Plant is required to document maintenance activities conducted on the equipment for proper documentation of equipment history. Proper documentation and equipment history can be used to support proper tracking of maintenance to closeout, risk management, asset management and lifecycle analysis, trend analysis and ensure accountability and traceability. Plant Management is responsible for establishing a standard to document the high priority maintenance work. To implement this standard, the Plant must develop or update a Work Management Policy that establishes guidelines for work prioritization and subsequently train their staff on this policy. The policy should include regular internal audits or reviews to ensure adherence to the policy. As a part of the corrective action plan submitted to ESRB, the Plant must submit the new or updated Work Management Policy and a training record.

Finding 2: The Plant must conduct the required maintenance activities on the Black Start system.

GO 167-C Appendix C, MS 3: Maintenance Management and Leadership states:

"Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities."

GO 167-C Appendix C, MS 9: Conduct of Maintenance states:

"Maintenance is conducted in an effective and efficient manner, so equipment performance and material condition effectively support reliable facility operation."

GO 167-C Appendix, OS 19: Emergency Grid Operations states:

"The GAO or ESSO prepares for conditions that may be reasonably anticipated to occur during periods of stress or shortage on the state's electric grid."

The Plant is equipped with a Black Start system that can be used to restart and restore power to the Plant without relying on external power. The system uses a Battery Energy Storage System (BESS) array located on site to independently come online in the event of a grid outage. The Black Start system became operational in 2021. Since the Black Start was commissioned, the Plant has not conducted routine inspection and preventative maintenance required aside from Heating Ventilation and Air Conditioning (HVAC). For the maintenance activities that have been conducted, the contractor, Fluence, has not provided the Plant with records or service

reports of the completed maintenance activities. The service provider must provide maintenance reports, and the Plant must maintain a record of the maintenance and ongoing equipment issues. As a part of the corrective action plan submitted to ESRB, the Plant must request service reports or maintenance records from Fluence for the past 3 years and provide the documentation to ESRB.

The Plant must conduct inspections and maintenance as required by the Original Equipment Manufacturer (OEM) for all critical areas of the Black Start system, including but not limited to the Battery modules and connections, E-Stop and safety systems, power conversion system, external electrical connections, and the BESS structure. Preventative maintenance is critical to ensure the availability and reliability of the Black Start BESS, especially given its critical role in supporting California's grid during emergency operations.

Figure 1: Black Start BESS

Finding 3: Safety signage identifying electrical and high voltage hazards on buildings must be improved.

GO 167-C Appendix C, MS 1: Safety states:

> *"The protection of life and limb for the work force is paramount. The company behavior ensures that individuals at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment, and the policies and procedures foster such a safety culture, and the attitudes and behaviors of individuals are consistent with the policies and procedures."*

GO 167-C Appendix D, OS 8: Plant Status and Configuration states:

> *"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."*

Guideline for Standard 8 Plant Status and Configuration states in part:

> *"10. Procedures are implemented to control the placement of caution, warning, information and other similar tags on plant equipment and operator aids in the plant."*

GO 167-C Appendix D, OS 9: Engineering and Technical Support states:

> *"Engineering activities are conducted such that equipment performance supports reliable facility operation. Engineering provides the technical information necessary for the facility to be operated and maintained within the operating parameters defined by facility design. Software is up-to-date for cyber security and routinely backed up for safety, reliability, and operational purposes. Engineering and technical staff provide support, when needed, to operations and maintenance groups to resolve operations and maintenance problems."*

ESRB found that most of the buildings with high voltage hazards inside were missing the required exterior signage indicating those high voltage hazards. Illegible or missing signage can lead to accidental entry into hazardous areas, unclear information about necessary repairs, and exposure to high voltage. These signs are critical to the safety of employees, contractors, and visitors who may not be familiar with the equipment and their inherent dangers. The Plant must take immediate corrective actions to affix safety signage indicating those hazards to exterior of buildings with high voltage hazards inside for the safety of personnel and visitors.

Figure 2: Electrical Package door without electrical hazard identification signage

Figure 3: Electrical Package entrance without electrical hazard identification signage

Finding 4: National Fire Protection Association (NFPA) 704 placards are inaccurate and must be corrected.

GO 167-C, Appendix C, MS 1: Safety states in part:

> *"The protection of life and limb for the work force is paramount. The company behavior ensures that individuals at all levels of the organization consider safety as the overriding priority."*

GO 167-C, Appendix C, MS 11: Plant Status and Configuration states:

> *"Station activities are effectively managed, so facility status and configuration are maintained to support safe, reliable, and efficient operation."*

NFPA 704: 4.2.3.3 states in part:

> *"Where more than one chemical is present in a building or specific area, professional judgement shall be exercised to indicate ratings using the following methods:*
>
> *Composite Method. Where many chemicals are present, a single sign shall summarize the maximum ratings contributed by the material(s) in each category and the special hazard category for the building and/or area."*

ESRB inspectors identified several NFPA 704 hazard identification placards that inaccurately identified the hazards present. NFPA placards are critical for identifying hazards in an area for staff, contractors, visitors and emergency responders. The Plant must continue to perform routine inspections of hazardous material storage and maintain a practice to continuously identify new materials stored updating signage as required. During the field inspection, the Plant corrected the following inaccurate NFPA placards identified by ESRB:

1. Two Unit Auxiliary Transformers (UATs) are located in the substation. Each UAT has two NFPA placards. The placards are contradictory. The Health rating in the blue diamond has contradictory ratings of both 0 and 1.

Figure 4: UAT NFPA Placard; Left: Health rating of 1, Right: Health rating of 0

Figure 5: Corrected NFPA Placards

2. The Hazardous Materials Storage area has an inaccurate NFPA 704 placard. The material stored inside of the container exceeded the hazards identified on the NFPA placard hung on the container. NFPA requires that the placard identify the highest rated hazard of the materials stored inside the container. Aeroshell 41 stored inside the container has a flammability rating of 4 and a health rating of 3, while the storage reflects lower ratings.

Figure 6: Aeroshell stored in the Plant's Hazardous Material Storage

Figure 7: Hazardous Material Storage area does not have the maximum rating of stored contents

Finding 5: Portable fire extinguisher inspection and maintenance practices must be improved.

GO 167-C, Appendix D, OS 13: Routine Inspections states in part:

> *"Routine inspections by facility personnel ensure that all areas and critical parameters of facility operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed."*

GO 167-C, Appendix D, OS 20: Preparedness for On-Site and Off-Site Emergencies states in part:

> *"The GAO or ESSO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect facility personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the facility."*

NFPA 10, Standard for Portable Fire Extinguishers, Chapter 7 Inspection, Maintenance and Recharging states in part:

> *"7.2.4.1 Manual Inspection Records*
>
> *7.2.4.1.1 Where manual inspections are conducted, records for manual inspections shall be kept on a tag or label attached to the fire extinguisher, on an inspection checklist maintained on file, or by an electronic method.*
>
> *7.2.4.1.4 Personnel making manual inspections shall keep records of all fire extinguishers inspected, including those found to require corrective action."*

7.3.4 Annual Maintenance Record Keeping

7.3.4.1 Each fire extinguisher shall have a tag or label securely attached that indicates that maintenance was performed.

7.4.4.1.1 The tag or label, as a minimum, shall identify the following:

1) *Month and year maintenance was performed*
2) *Person performing the work*
3) *Name of the agency performing the work*

California Code of Regulations (CCR) Title 8: California Occupational Safety and Health Administration (Cal OSHA) Section 6151: Portable Fire Extinguishers states in part:

"e) Inspection, Maintenance and Testing.

(1) The employer shall be responsible for the inspection, maintenance and testing of all portable fire extinguishers in the workplace.

(2) Portable extinguishers or hose used in lieu thereof under Subsection (d)(3) of this Section shall be visually inspected monthly.

(3) Portable fire extinguishers shall be subjected to an annual maintenance check. Stored pressure extinguishers do not require an internal examination. The employer shall record the annual maintenance date and retain this record for one year after the last entry or the life of the shell, whichever is less. The record shall be available to the Chief upon request."

ESRB inspectors identified three portable fire extinguishers at the Plant that were missing the required inspection and maintenance. The deficiencies included one extinguisher missing the State Fire Marshal Inspection Stickers identifying annual maintenance, a fire extinguisher had not received annual maintenance since 2023, and a fire extinguisher missing its monthly inspection for March 2025. During the monthly inspections, the missing annual maintenance must be identified and corrected. The fire extinguisher missing the annual maintenance sticker was located next to Unit 4 Stack. The Plant promptly removed the unit from service during the audit. The fire extinguisher with delinquent annual maintenance was removed from its location on the forklift and replaced with an appropriate fire extinguisher. The Plant must ensure the completion of routine inspection and maintenance of all fire extinguishers and maintain proper recordkeeping to ensure the safety of personnel and equipment.

Figure 8: Fire Extinguisher 090 (Unit 4 Stack) with no State Fire Marshal Sticker

Figure 9: Fire Extinguisher 26 (Water Tank) missing March Inspection

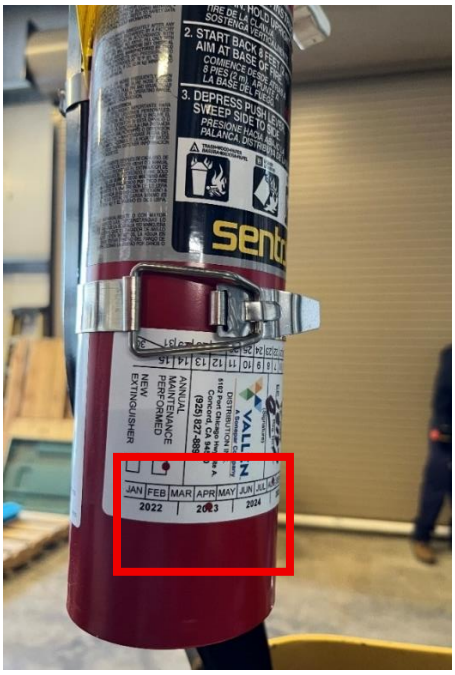


Figure 10: Fire Extinguisher on Forklift requires annual maintenance

Finding 6: Lead acid DC Battery terminal corrosion must be cleaned and routinely monitored.

GO 167-C, Appendix C, MS 9: Conduct of Maintenance states:

> *"Maintenance is conducted in an effective and efficient manner, so equipment performance and material condition effectively support reliable facility operation."*

GO 167-C, Appendix C, MS 11: Facility Status and Configuration states:

> *"Station activities are effectively managed, so facility status and configuration are maintained to support safe, reliable, and efficient operation."*

GO 167-C, Appendix C, MS 13: Equipment Performance and Materiel Condition states:

> *"Equipment performance and materiel condition support reliable facility operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems, corrosion, and degradation."*

The Lead-Acid battery terminals located in all Units' electrical package and the 5 kV building had built up corrosion that requires cleaning. Corrosion on battery terminals can impede electrical flow, reduce efficiency, accelerate terminal damage, and risk further corrosion. As a part of the corrective action plan submitted to ESRB, the Plant must develop a schedule or recurring work order to conduct routine inspections of the batteries. The Plant cleaned the battery terminals during the audit. Examples of buildup are shown in the figures below.

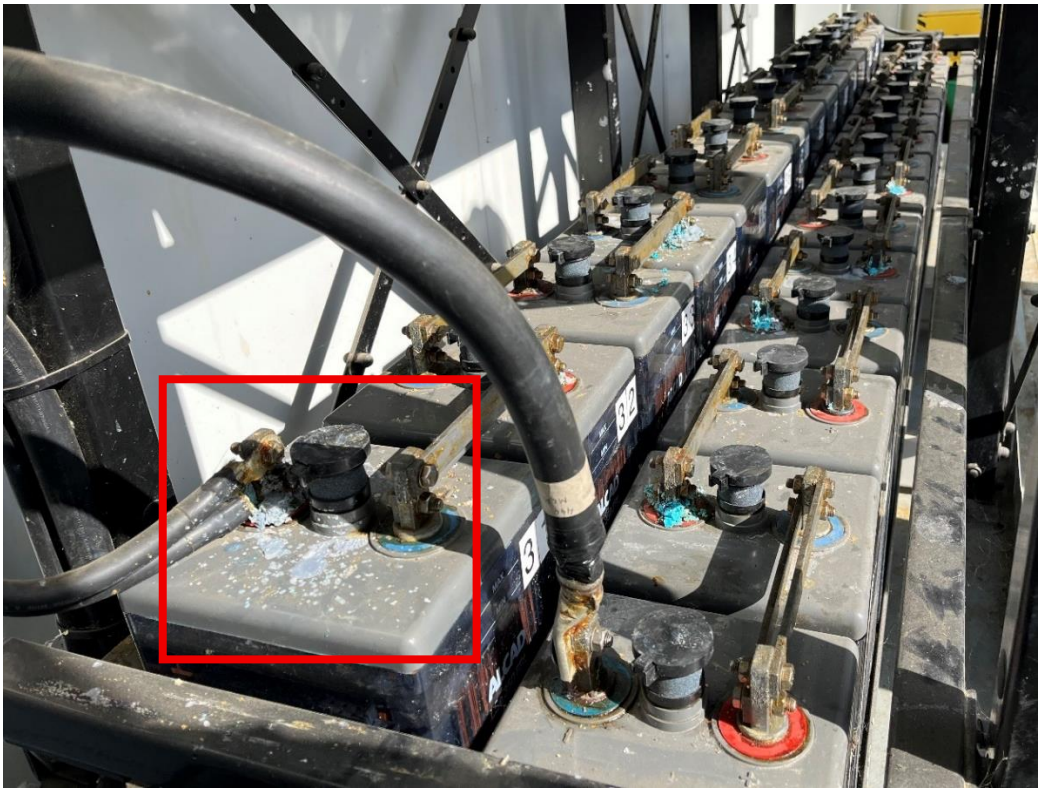


Figure 11: Corrosion on Lead-Acid Battery Terminals

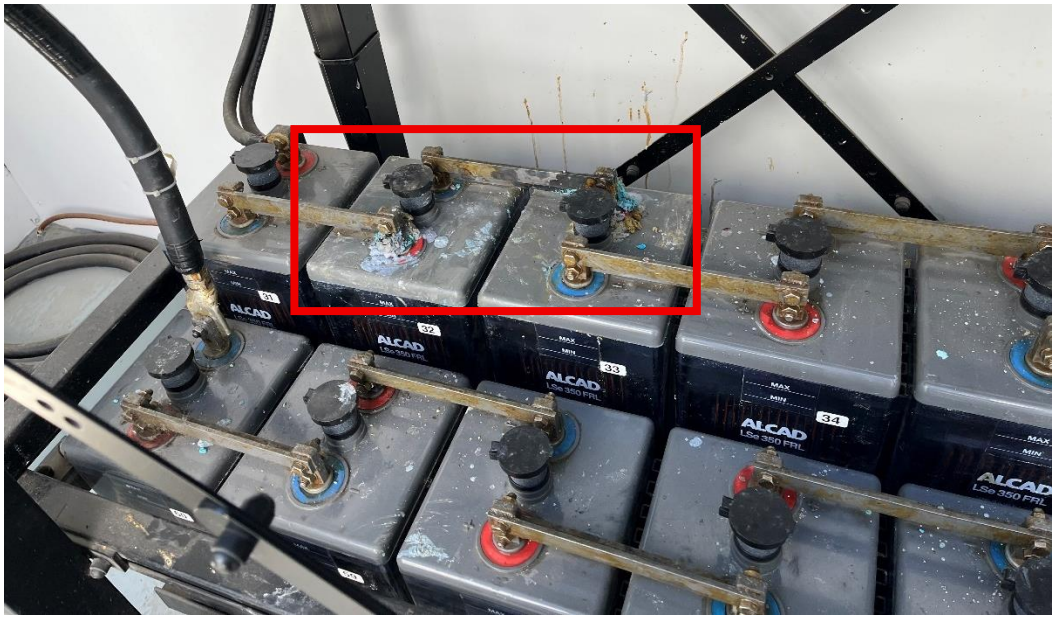


Figure 12: Corrosion on Lead-Acid Battery Terminals

Figure 13: Corrosion on Lead-Acid Battery Terminals

Finding 7: A Deficiency Tag that is no longer applicable must be removed from Combustion Turbine 4 compartment.

GO 167-C Appendix D, OS 1: Safety states:

> *"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."*

GO 167-C Appendix D, OS 8: Plant Status and Configuration states:

> *"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."*

Guideline for Standard 8 Plant Status and Configuration states in part:

> *"10. Procedures are implemented to control the placement of caution, warning, information and other similar tags on plant equipment and operator aids in the plant."*

ESRB inspectors identified a Deficiency Tag located in the right compartment of Combustion Turbine (CT) Unit 4 from 2016. The Plant informed ESRB that the deficiency is no longer applicable and that deficiency tags are no longer used at the Plant. Inaccurate and outdated tags that misidentify equipment deficiencies can create a safety and operational risk. The deficiency tag must be removed from CT 4.

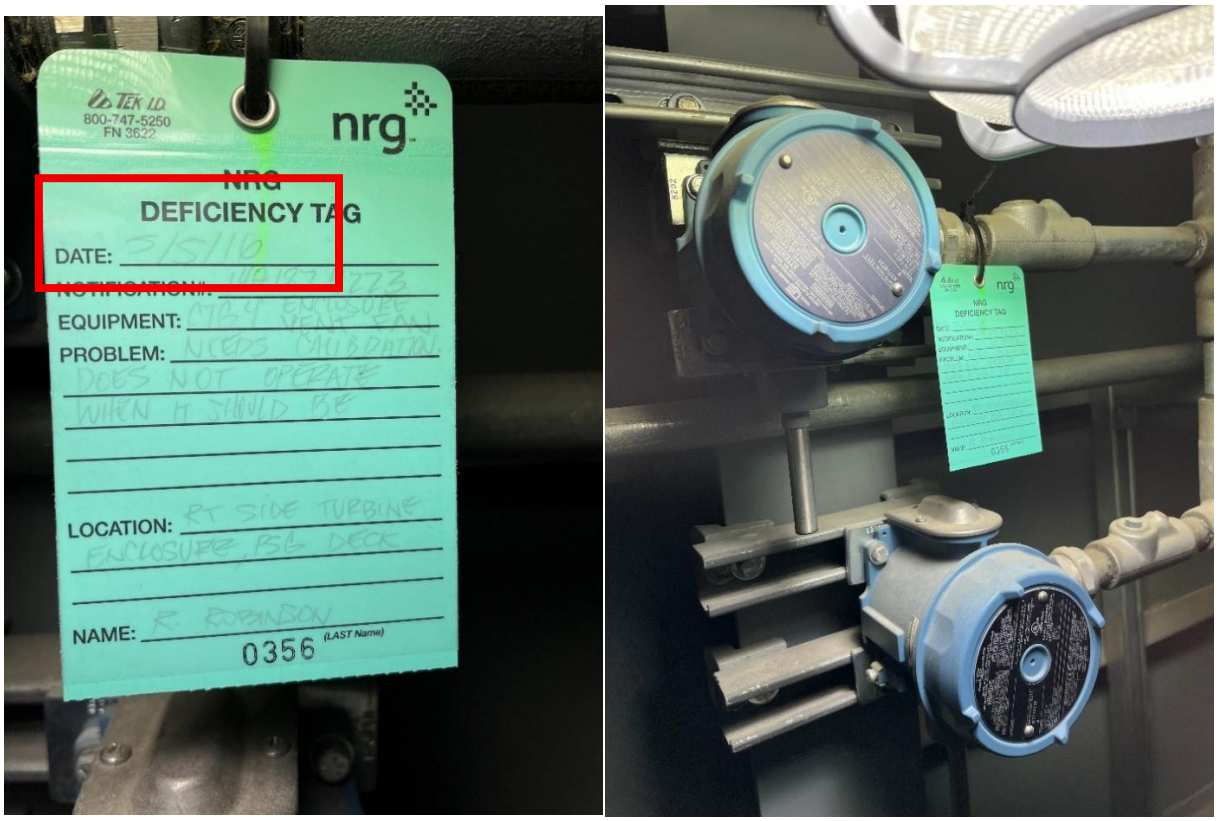


Figure 14: A deficiency tag was left from 2016

Finding 8: Corporate Lockout Tagout (LOTO) procedure requires review per the Plant's LOTO procedure.

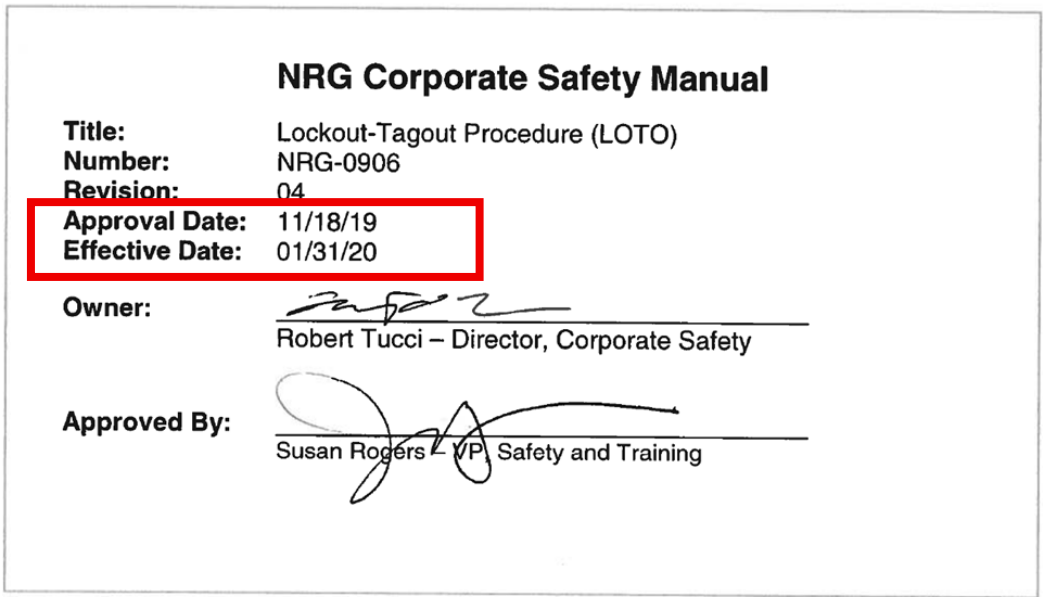
GO 167-C Appendix D, OS 1: Safety states:

> *"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."*

GO 167-C Appendix D, OS 7: Operation Procedures and Documentation states:

> *"Operation step wise procedures exist for critical systems and the states of those systems are necessary for the operation of the unit including startup, shutdown, charging, discharging, normal operation, failure detection, alarm response, reasonably anticipated abnormal and emergency conditions, and restoration. Operation procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures are current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid."*

According to Section 3.33 of the NRG Corporate LOTO Procedure (NRG Lockout-Tagout Procedure NRG_0906), the LOTO procedure must be reviewed "every two years by the NRG Plant Operations LOTO Team." The latest version of the document submitted to ESRB became effective in 2020 and does not show any reviews or revision have been completed since then. The document has a section on Page 65 to track version history, showing 2020 as the latest version. The Plant must conduct a review and revise as necessary. If reviews are completed, and no revision is required, the review must be documented stating there were no revisions made, but a review was completed. If significant changes are made to the policy and affect workplace procedures or employee responsibilities, a more frequent review may be required. After revisions are made, the Plant must communicate the revised document to all affected employees at the Plant. As a corrective action, the Plant must submit the reviewed and revised procedure to ESRB.



NRG Corporate Safety Manual

Title:	Lockout-Tagout Procedure (LOTO)
Number:	NRG-0906
Revision:	04
Approval Date:	11/18/19
Effective Date:	01/31/20

Owner: Robert Tucci – Director, Corporate Safety

Approved By: Susan Rogers – VP, Safety and Training

Figure 15: NRG Lockout-Tagout Procedure NRG_0906 showing effective date from 2020

Finding 9: An updated Arc Flash Analysis must be conducted for the Plant.

GO 167-C Appendix D OS 1: Safety states:

> *"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."*

GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:

> *"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."*

NFPA 70E, Section 130.5(G) states:

> *"The incident energy analysis shall be updated when changes occur in the electrical distribution system that could affect the results of the analysis. The incident energy analysis shall also be reviewed for accuracy at intervals not to exceed 5 years."*

ESRB found that the Arc Flash hazard identification labels on site were from a study conducted in 2013, prior to the Black Start system being added to the Plant. Arc Flash Analyses are required to be conducted in intervals not exceeding 5 years. An Arch Flash study was conducted when Black start was commissioned in 2021, but hazard labels were only applied to equipment associated with the Black Start. It was unclear if the Arc flash study conducted in 2021 reviewed the entire site or was limited to the equipment associated with the Black Start system. The Plant must verify the scope of the 2021 Arc Flash Analysis and determine if a new analysis is required encompassing the entire site. Information related to the 2013 Arc Flash Analysis must be updated to the relevant study, 2021 or a new study conducted by the Plant.

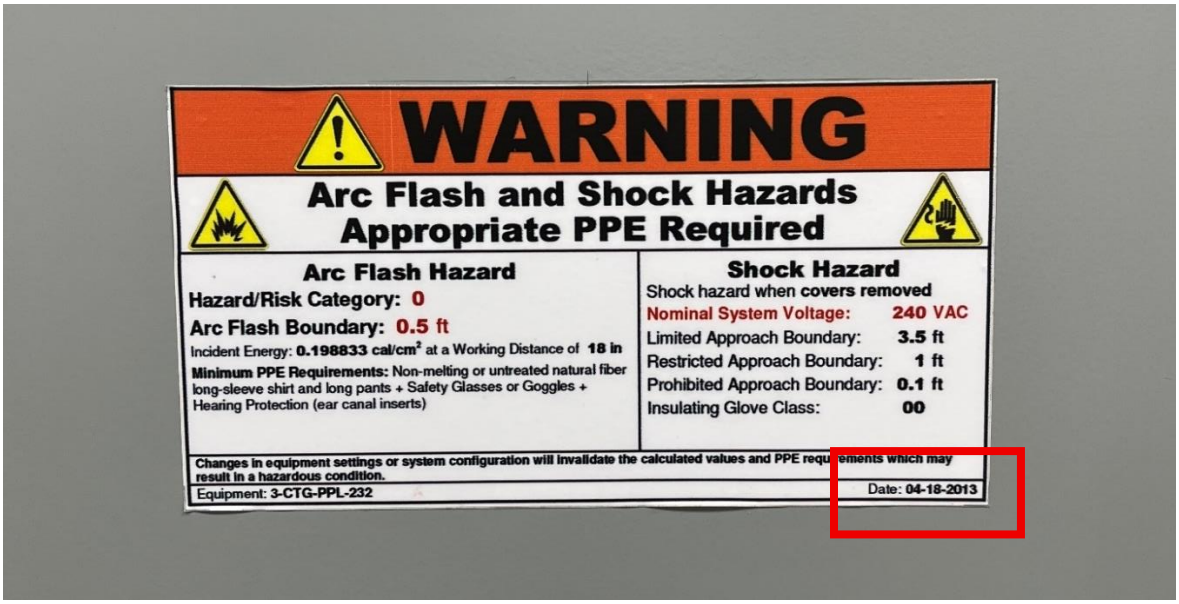


Figure 16: Arc Flash Label dated 2013

Finding 10: Bird nests were present on equipment at the Plant.

GO 167-C, Appendix C, MS 9 Conduct of Maintenance states:

> *"Maintenance is conducted in an effective and efficient manner, so equipment performance and material condition effectively support reliable facility operation."*

GO 167-C, Appendix D, OS 8 Plant Status and Configuration states:

> *"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."*

ESRB inspectors discovered an active bird's nest within the Gas Chromatograph station. Birds and their nests pose several risks to Plant operations. Birds' nests are composed of debris that could contain flammable or conductive material, all of which needs to be mitigated. The nest should be removed from the Gas Chromatograph station area when deemed appropriate by the Plant in accordance with all applicable environmental regulations and laws. Following the removal of the nest, preventative measures should be taken to prevent future nests from being made around the Plant.

Figure 17: Bird nest in Gas Chromatograph structure

II. Observations

Observation 1: Tracking of calibrated test equipment and tools should be improved.

The Plant did not have a method for tracking when test equipment required calibration. The Plant uses an array of test equipment and tools that require periodic calibration. While on site, ESRB inspected various test equipment and did not identify any equipment exceeding its calibration cycle. Examples of commonly used equipment that require periodic calibration at power generation facilities include torque wrenches, multimeters, insulation resistance testers, ground resistance testers, hot sticks, temperature probes and infrared cameras. Industry best practice used by other plants is to utilize the CMMS to create recurring work notifications that identify the need to calibrate the equipment at the required interval. An alternative for the Plant is to maintain a list of all test equipment that requires periodic calibration with the last service date and the next required calibration date.

III. List of Documents Reviewed

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors**
	2	Evacuation Procedure
	3	Evacuation Map and Plant Layout
	4	Evacuation Drill Report & Critique (last 3 years)
	5	Hazmat Handling Procedure
	6	SDS for All Hazardous Chemicals
	7	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	8	OSHA Form 300 (Injury Log) in last 4 years
	9	OSHA Form 301 (Incident Report) in last 4 years
	10	List of all CPUC Reportable Incidents (last 5 years)
	11	Root Cause Analysis of all Reportable Incidents (if any)
	12	Fire Protection System Test Report and Inspection Record (last 3 years)
	13	Insurance Report / Loss Prevention / Risk Survey (last 3 years)
	14	Lockout / Tagout Procedure (last 3 revisions, if applicable)
	15	Arc flash Analysis
	16	Confined Space Entry Procedure
	17	Plant Physical Security and Cyber Security Procedures and Records
	18	Fire Protection System Inspection Record
	19	Job Safety Analysis Program**
Training	20	Safety Training Records*
	21	Skill-related Training Records*
	22	Certifications for Welders, Forklift & Crane Operators*
	23	Hazmat Training and Record*
Contractor	24	Latest list of Qualified Contractors*

	25	Contractor Selection / Qualification Procedure
	26	Contractor Certification Records
	27	Contractor Monitoring Program
Regulatory	28	Daily CEMS Calibration Records
	29	Air Permit
	30	Water Permit
	31	Spill Prevention Control Plan (SPCC)
	32	CalARP Risk Management Plan (RMP)
O&M	33	Daily Round Sheets / Checklists
	34	Feedwater Grab-sample Test Records
	35	Water Chemistry Manual
	36	Logbook**
	37	List of Open/Backlogged Work Orders*
	38	List of Closed/Retired Work Orders (last 2 years)*
	39	Work Order Management Procedure (last 3 revisions, if applicable)
	40	Computerized Maintenance Management System (Demonstration Onsite)**
	41	SCADA system (Demonstration On-site)**
	42	All Root Cause Analyses (if any)
Gas Turbine	43	Borescope Inspection Reports (last 2 years)
	44	Maintenance & Inspection Procedures (or Related Documents) (last 3 revisions, if applicable)
	45	Intercooler Inspection Reports
	46	Combustors Inspection (CI) Reports
	47	Hot Gas Path (HGI) Inspection Reports
	48	Bearing Lube Oil Analysis Reports
	49	DC Lube Oil Pump Test Records

Main Plant Compressor(s)	50	Inspection Procedures and Records
Document	51	P&IDs*
	52	Vendor Manuals*
Spare Parts	53	Spare Parts Inventory List
	54	Shelf-life Assessment Report
Management	55	Employee Performance Review Procedures and Verifications
	56	Organizational Chart
Generator	57	Bearing Lube Oil Analysis
	58	Maintenance & Inspection Procedures (or related documents)
	59	Polarization Test Records
Transformer	60	Hot Spots / IR Inspection Reports
	61	Oil Analysis Reports
Cathodic Protection	62	Procedures and Inspection Records
Black Start Battery System	63	Annual Maintenance Plan & Records
	64	State of Charge or Capacity Tests
	65	Original Equipment Manufacturer (OEM) Maintenance Plan Agreement
	66	OEM Manual
Instrumentation	67	Instrument Calibration Procedures and Records
Test Equipment	68	Calibration Procedures and Records
Emission Control Equipment (SCR, Ammonia, NOx, CO)	69	Maintenance & Inspection Procedures and Records
Internal Audit	70	Internal Audit Procedures and all Records