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

August 22, 2025

Kenneth Anderson
Panoche Valley Solar – RWE
721 Little Panoche Road
Paicines, CA 95043

SUBJECT: **Generation Audit of Panoche Valley Solar, Audit Number: GA2025-05PA**

Dear Mr. Anderson:

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 Panoche Valley Solar from May 12-15, 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 September 19, 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 Panoche Valley Solar 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.

The CPUC intends to publish the audit report of Panoche Valley Solar 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 September 19, 2025.

Please note that ESRB will also post Panoche Valley Solar’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 (SED), CPUC
Eric Wu, Program Manager, ESRB, SED, 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
Panoche Valley Solar
May 12 - 15, 2025

I. Findings Requiring Corrective Action

Finding 1: Vegetation management must be improved.

General Order (GO) 167-C, Appendix C, Maintenance Standard (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. 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 C, MS 4: Problem Resolution and Continuing Improvement states:

> *"The company values and fosters an environment of continuous improvement, timely and effective problem resolution, and problem prevention. This can be accomplished by applying industry best practices, lessons learned, and proven safety measures for the safety and reliability of both the GA and ESS."*

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."*

During the site visit of Panoche Valley Solar, the Plant, Electric Safety and Reliability Branch (ESRB) inspectors identified excessive vegetation growth near operating equipment including inverter skids, Direct Current (DC) combiner boxes, and under solar photovoltaic arrays. Examples of the overgrown vegetation are shown in the figures below. During the site visit, the Plant informed ESRB of eight vegetation fires that have occurred within the last three years. The plant operates under environmental restrictions presented by the California Endangered Species Act (CESA) Incidental Take Permit (ITP). Current vegetation mitigation activities include manual removal using String-Trimmers (weed whackers) and grazing of sheep. The current, limited, vegetation removal and control measures have proven to be inadequate and do not mitigate fire risk. The frequent vegetation fires may lead to equipment damage, plant outages and reliability issues, and safety hazards to personnel and the surrounding community.

The Plant must implement a vegetation management standard that balances compliance with environmental restrictions provided through the CESA ITP and vegetation fire risk mitigation by increasing vegetation mitigation activities and the frequency of such activities in critical areas. If necessary, the Plant must coordinate with California Department of Fish and Wildlife for alternative vegetation mitigation measures that support habitat and species protection while accomplishing fire prevention objectives. As a part of the corrective action plan submitted to ESRB, the Plant must submit a plan to develop or improve the vegetation mitigation practices at the Plant.

Figure 1: Vegetation Growth in Solar PV Arrays

Figure 2: Vegetation growth near DC Combiner Boxes

Figure 3: Vegetation growth around Inverter Skid

Finding 2: Panoche Valley Solar does not report incidents and fire to the California Public Utilities Commission.

GO 167-C, Section 9.4 Safety Related Incident states in part:

> *"Within 24 hours of its occurrence, a GAO or ESSO shall report to the Commission's emergency reporting website any safety-related incident involving a GA or ESS. If internet access is unavailable, the GAO or ESSO may report using the backup telephone system. Such reporting shall include any incident that has resulted in death to a person; an injury or illness to a person requiring overnight hospitalization; a report to Cal/OSHA, OSHA, or other regulatory agency; or damage to the property of the GAO or ESSO or another person of more than $200,000, or involves a GA or ESS malfunction or failure resulting in fires, explosions, hazardous emissions, or safety related reports to other agencies."*

GO 167-C, Appendix C, MS 16: Regulatory Requirements states

> *"Regulatory compliance is paramount in the operation of the facility. Each regulatory event is properly identified, reported and appropriate action is taken to prevent recurrence."*

GO 167-C, Appendix D, Operation Standard (OS) 2: Organizational Structure and Responsibilities states:

> *"The organization with responsibility and accountability for establishing and implementing an operation 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, are clearly defined, and commensurate with responsibilities."*

Prior to the site visit portion of the audit, ESRB Inspectors became aware of a vegetation fire that occurred at Panoche Valley Solar on April 20th, 2025, through the Cal Fire Current Emergency Incidents[1]. After becoming aware of the incident, ESRB informed the Plant of the safety related reporting requirement, and that this event, as well as other fires that occur at the facility due to equipment malfunctions, must be reported to the CPUC within 24 hours of the incident occurring. The event shall be reported through the Commission's emergency reporting website[2]. The Plant reported the fire on April 30th.

During the audit, the Plant informed ESRB the fire on April 20th initiated at Switch Gear 2. The event was declared an anomaly, and a Root Cause Analysis of the event was not planned. Additionally, the Plant informed ESRB of 7 other fires that have occurred during 2023 and 2024 that were not reported to the CPUC. These fires were disclosed to the ESRB at the audit but should have been reported directly following the incident.

[1] Current Emergency Incidents | CAL FIRE
[2] California Public Utilities Commission Emergency Reporting

Figure 4: Switchgear 2 – April 2025 Fire Point of Origin

On June 11, 2025, the Plant experienced another fire at the facility that burned for two days and affected 592 acres. This fire occurred after ESRB's site visit portion of the audit in May 2025. The fire occurred after ESRB informed the Plant of GO 167-C Incident Reporting Requirement. The fire was not reported to the CPUC and as a result of continued lack of reporting, ESRB issues the attached Notice of Violation to Panoche Valley Solar.

Figure 5: June 11 Fire (Cal Fire San Benito-Monterey Unit)

Finding 3: The Plant exhibited inadequate maintenance practices.

GO 167-C Appendix A, Generating Asset and Energy Storage System Logbook Standards Exceptions 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, NonDestructive Examination, Post heat treatment, etc.,);*
> - *Maintenance activities performed;*
> - *Parts and tools information;*
> - *Job safety and environmental analysis information;*
> - *Permit information such as hot work, confined space entry, etc."*

GO 167-C, Appendix C, 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 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 10: Work Management states:

> *"Work is identified and selected based on priority to maintaining reliable facility operation. Work is planned, scheduled, coordinated, controlled, and supported with resources for safe, timely, and effective completion."*

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. Results of data collection and monitoring of parameters during routine inspections are utilized to identify and resolve problems, to improve facility operations, and to identify the need for maintenance."*

ESRB Inspectors observed severely insufficient inspection and maintenance planning and unacceptable maintenance practices at the Plant. The Plant lacked an overall maintenance plan and did not employ proper methods to track the completion of such inspection and maintenance activities. When activities were carried out, the resulting documentation was incomplete, unprofessional, and unclear. At the time of ESRB's site visit, the Plant had begun to transition to using SAP, a Computerized Maintenance Management System (CMMS). Prior to this transition, the Plant used hardcopies to track maintenance activities. The Plant must develop an overall site maintenance plan that addresses the deficiencies listed below. The maintenance plan must describe what equipment requires periodic inspections and preventive maintenance, the required frequency and a method for tracking the inspection and maintenance activities. The Plant must also conduct refresher training on the work management procedure and expectations for maintenance activities. As a part of the corrective action plan, the Plant must submit the overall site maintenance plan to ESRB, along with the training records and the training materials used.

1. No Method to track the status of Work Orders

The Plant lacked an established system to track and verify the completion of maintenance activities, showing signs of an ineffective overall maintenance plan and maintenance management. Using paper copies to conduct and track maintenance activities is an acceptable method to conduct work orders, however the manner in which it is implemented at the Plant proved insufficient leaving extensive gaps in their overall maintenance program and missing and incomplete work orders. ESRB observed insufficient means to track work that had been completed, and work that was still required to be completed. Because of the lack of a method to track the status of required work orders, like a CMMS or maintenance logbook, the Plant was unable to determine if work had been completed without reviewing individual work orders or inspection sheets for each activity.

2. Unacceptable Documentation Practices

The Plant used unacceptable methods to complete work orders and track the status of active inspections and maintenance activities. For example, the Plant tracked measured values, on sticky notes, hand drawn tables, scrap paper, and other means to write down measured values. These methods provide little to no context, were absent of units, and are not useable in a meaningful way. Other unacceptable methods observed at the Plant include listing the status of active work on the conference room white board, rather than creating a corrective maintenance work order and tracking the work order to completion. Specifically, during the ESRB site visit, ESRB observed inverter cable management status, broken indicator tags, and post fire

inspections were tracked manually on the whiteboard. While this provides a quick visual reference, it is not a reliable long-term tracking method, as information can be accidentally erased, altered, or lost, and there is no historical record for review or trend analysis.

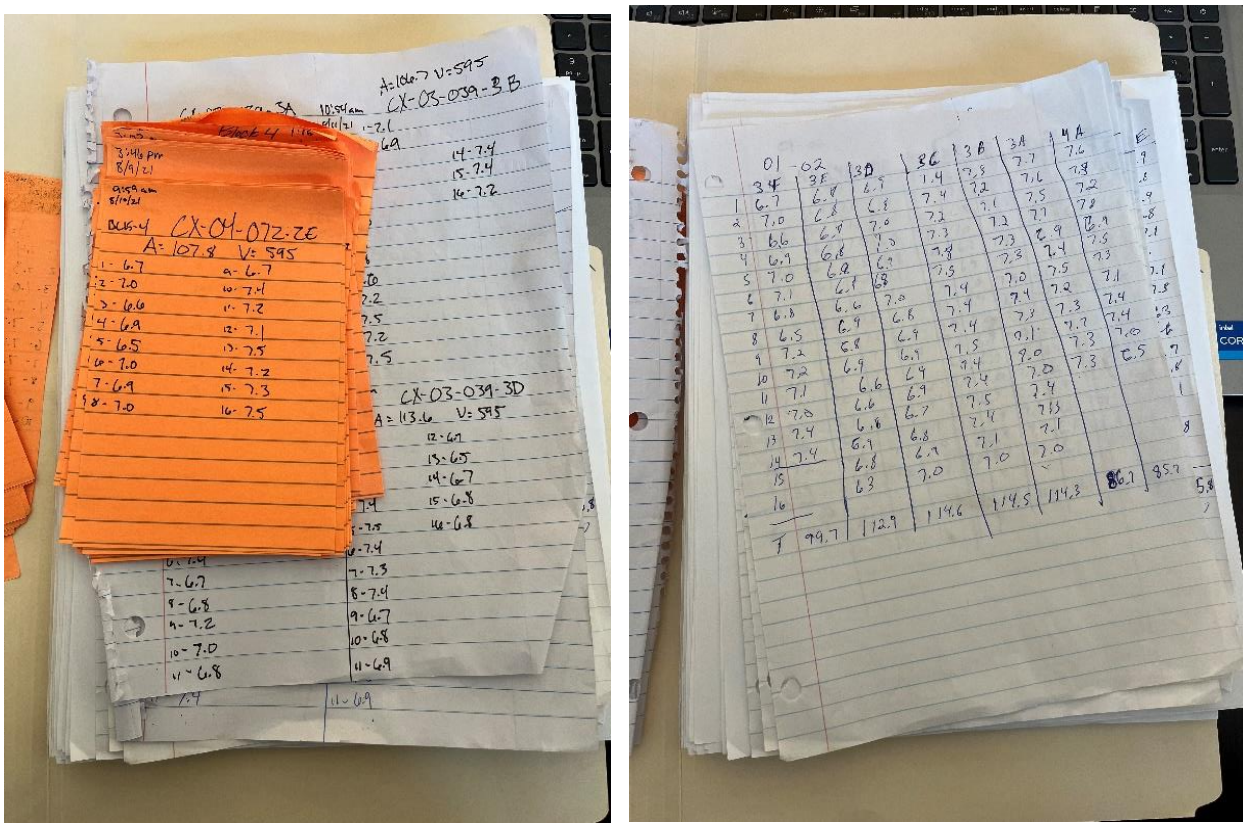


Figure 6: Work Orders from DC Combiner Box Measurements

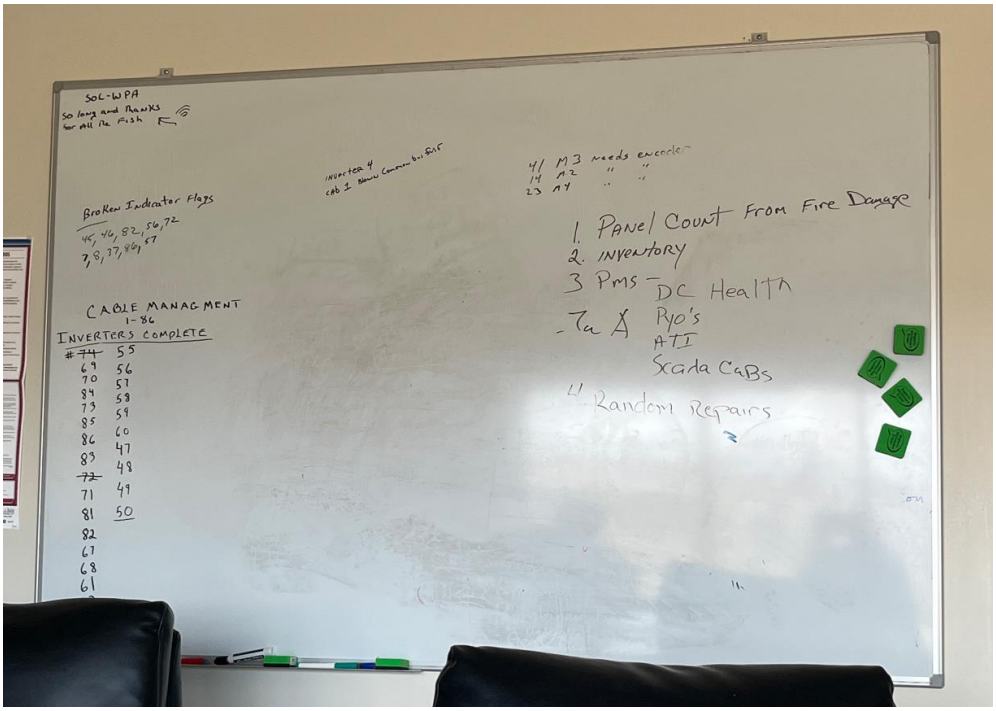
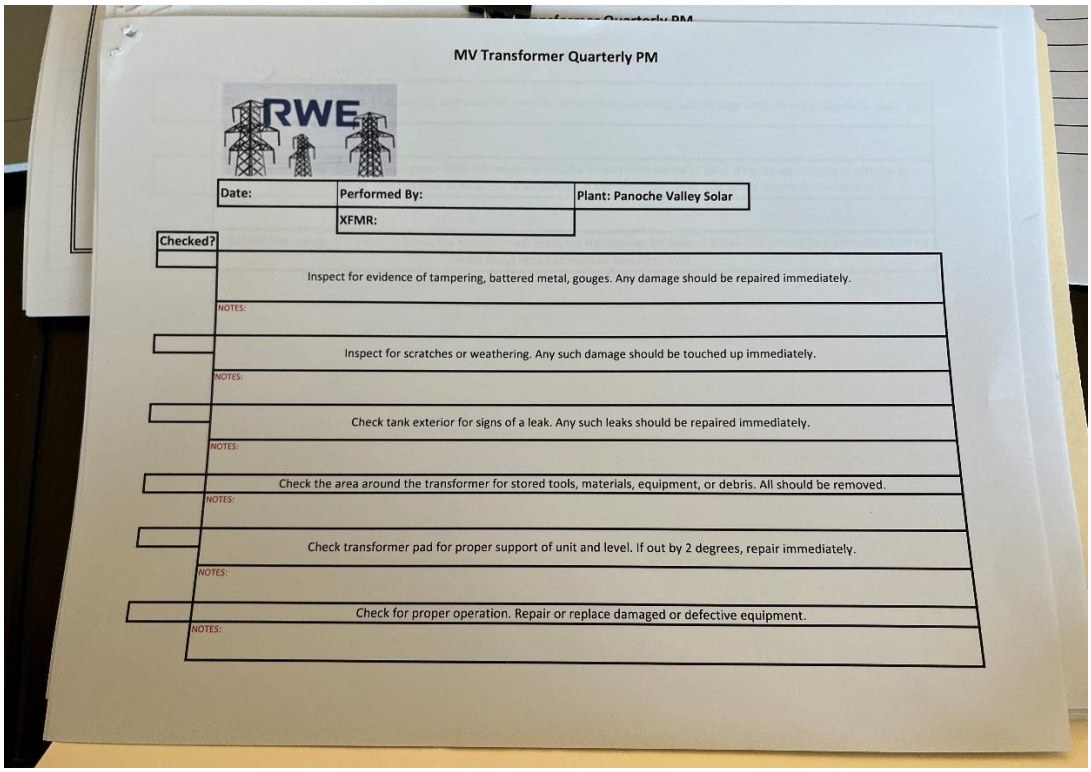


Figure 7: White Board in Conference Room used to track status of work

3. Maintenance Activities are not being completed

Due to the lack of the overall maintenance plan and methods to track the completion of maintenance activities as identified in item 1, there are gaps in critical maintenance activities resulting in equipment not receiving the required maintenance.

a. Transformers: The Quarterly Medium Voltage transformer preventative maintenance (PM) only had 10 out of 86 (11.6%) completed from May of 2024. There were no records beyond May 2024. During the document review, the team found oil analysis reports only from 2021, with no subsequent records. Transformer Oil Analysis records were not available from 2022-2025. Transformers are critical components in any generating facility, and periodic oil analysis is essential for assessing their operational health. Without consistent testing and proper documentation, it is not possible to detect emerging issues such as insulation degradation, moisture ingress, or dissolved gases that could lead to failures, unplanned outages, or costly repairs.

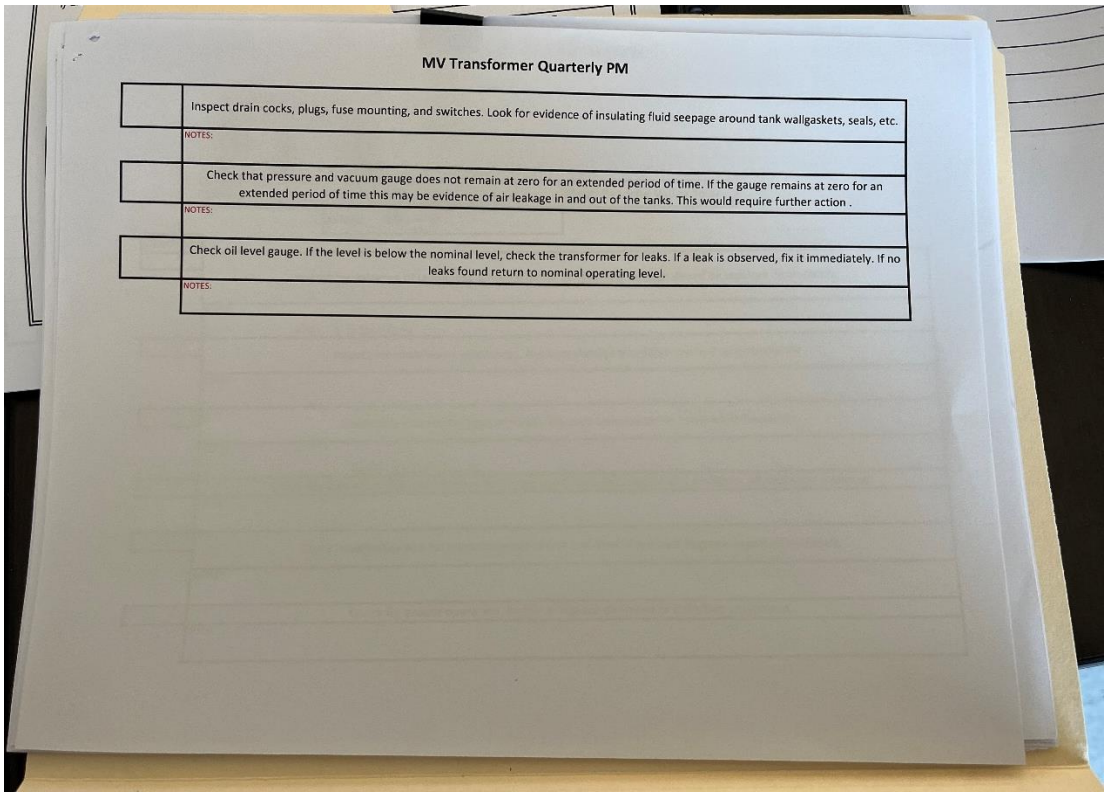


MV Transformer Quarterly PM

RWE

Date:	Performed By:	Plant: Panoche Valley Solar
	XFMR:	

Checked?	
	Inspect for evidence of tampering, battered metal, gouges. Any damage should be repaired immediately.
	NOTES:
	Inspect for scratches or weathering. Any such damage should be touched up immediately.
	NOTES:
	Check tank exterior for signs of a leak. Any such leaks should be repaired immediately.
	NOTES:
	Check the area around the transformer for stored tools, materials, equipment, or debris. All should be removed.
	NOTES:
	Check transformer pad for proper support of unit and level. If out by 2 degrees, repair immediately.
	NOTES:
	Check for proper operation. Repair or replace damaged or defective equipment.
	NOTES:

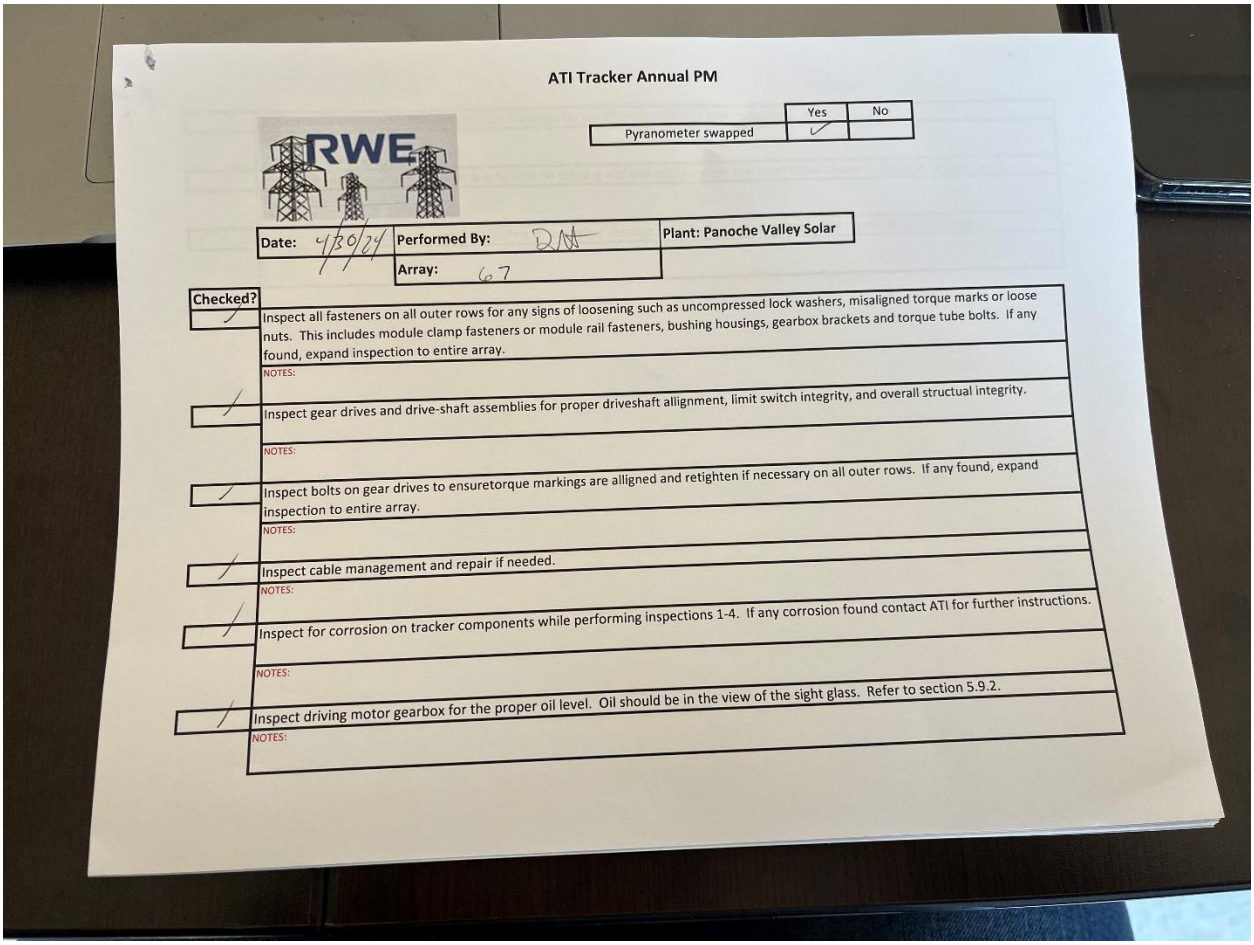


MV Transformer Quarterly PM

	Inspect drain cocks, plugs, fuse mounting, and switches. Look for evidence of insulating fluid seepage around tank wallgaskets, seals, etc.
	NOTES:
	Check that pressure and vacuum gauge does not remain at zero for an extended period of time. If the gauge remains at zero for an extended period of time this may be evidence of air leakage in and out of the tanks. This would require further action .
	NOTES:
	Check oil level gauge. If the level is below the nominal level, check the transformer for leaks. If a leak is observed, fix it immediately. If no leaks found return to nominal operating level.
	NOTES:

Figure 8: Example of Quarterly Transformer PM

b. **Trackers:** Per the Original Equipment Manufacturer (OEM) guidance, ATI Solar Trackers require a semiannual, annual, and biennial PM. The Plant only had record of completed PMs for 5 arrays in April 2024 and 5 Arrays in August of 2024. Other records were incomplete.



ATI Tracker Annual PM

	Yes	No
Pyranometer swapped	✓	

RWE

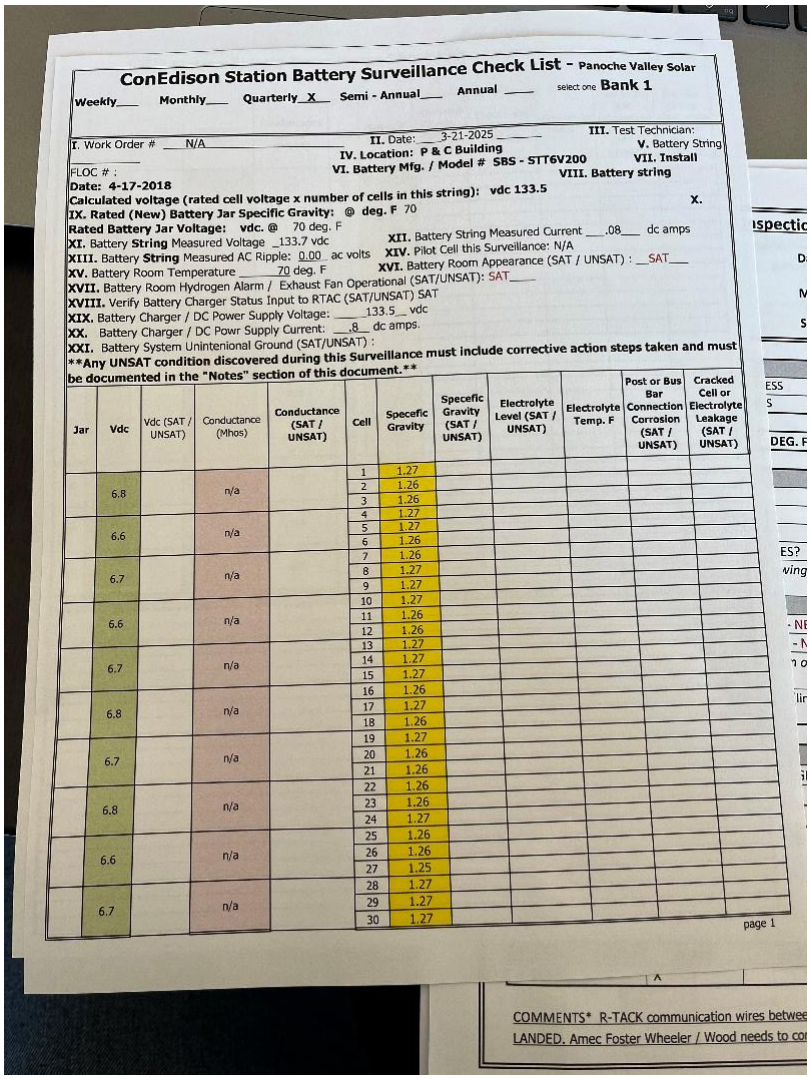
Date: 4/30/24 | Performed By: DM | Plant: Panoche Valley Solar

Array: 67

Checked?	
✓	Inspect all fasteners on all outer rows for any signs of loosening such as uncompressed lock washers, misaligned torque marks or loose nuts. This includes module clamp fasteners or module rail fasteners, bushing housings, gearbox brackets and torque tube bolts. If any found, expand inspection to entire array. NOTES:
✓	Inspect gear drives and drive-shaft assemblies for proper driveshaft allignment, limit switch integrity, and overall structual integrity. NOTES:
✓	Inspect bolts on gear drives to ensuretorque markings are alligned and retighten if necessary on all outer rows. If any found, expand inspection to entire array. NOTES:
✓	Inspect cable management and repair if needed. NOTES:
✓	Inspect for corrosion on tracker components while performing inspections 1-4. If any corrosion found contact ATI for further instructions. NOTES:
✓	Inspect driving motor gearbox for the proper oil level. Oil should be in the view of the sight glass. Refer to section 5.9.2. NOTES:

Figure 9: Available ATI Tracker Record from April 2024

c. **Lead Acid Batteries:** DC Battery Bank inspections are required to be completed monthly and quarterly. The last records available for monthly inspections were from June, July and September of 2024. For Quarterly, the last available record was from September of 2024. Even when the maintenance activity was attempted as shown in the figure below, they were not done so adequately. The figure shows the voltage and specific gravity were recorded and the rest of the maintenance activity was not completed including marking the recorded values as satisfactory or unsatisfactory.



ConEdison Station Battery Surveillance Check List - Panoche Valley Solar

Weekly___ Monthly___ Quarterly_X__ Semi - Annual___ Annual ____ select one **Bank 1**

I. Work Order # ___N/A_____ II. Date: ___3-21-2025 _____ III. Test Technician:
FLOC # : IV. Location: P & C Building V. Battery String
Date: 4-17-2018 VI. Battery Mfg. / Model # SBS - STT6V200 VII. Install
Calculated voltage (rated cell voltage x number of cells in this string): vdc 133.5 VIII. Battery string
IX. Rated (New) Battery Jar Specific Gravity: @ deg. F 70 X.
Rated Battery Jar Voltage: vdc. @ 70 deg. F
XI. Battery **String** Measured Voltage _133.7 vdc **XII.** Battery String Measured Current ___.08___ dc amps
XIII. Battery **String** Measured AC Ripple: 0.00 ac volts **XIV.** Pilot Cell this Surveillance: N/A
XV. Battery Room Temperature _____70 deg. F **XVI.** Battery Room Appearance (SAT / UNSAT) : __SAT___
XVII. Battery Room Hydrogen Alarm / Exhaust Fan Operational (SAT/UNSAT): SAT____
XVIII. Verify Battery Charger Status Input to RTAC (SAT/UNSAT) SAT
XIX. Battery Charger / DC Power Supply Voltage: _____133.5__ vdc
XX. Battery Charger / DC Powr Supply Current: ___.8__ dc amps.
XXI. Battery System Unintenional Ground (SAT/UNSAT) :
****Any UNSAT condition discovered during this Surveillance must include corrective action steps taken and must be documented in the "Notes" section of this document.****

Jar	Vdc	Vdc (SAT / UNSAT)	Conductance (Mhos)	Conductance (SAT / UNSAT)	Cell	Specefic Gravity	Specefic Gravity (SAT / UNSAT)	Electrolyte Level (SAT / UNSAT)	Electrolyte Temp. F	Post or Bus Bar Connection Corrosion (SAT / UNSAT)	Cracked Cell or Electrolyte Leakage (SAT / UNSAT)
	6.8		n/a		1	1.27					
					2	1.26					
					3	1.26					
	6.6		n/a		4	1.27					
					5	1.27					
					6	1.26					
	6.7		n/a		7	1.26					
					8	1.27					
					9	1.27					
	6.6		n/a		10	1.27					
					11	1.26					
					12	1.26					
	6.7		n/a		13	1.27					
					14	1.27					
					15	1.27					
	6.8		n/a		16	1.26					
					17	1.27					
					18	1.26					
	6.7		n/a		19	1.27					
					20	1.26					
					21	1.26					
	6.8		n/a		22	1.26					
					23	1.26					
					24	1.27					
	6.6		n/a		25	1.26					
					26	1.26					
					27	1.25					
	6.7		n/a		28	1.27					
					29	1.27					
					30	1.27					

page 1

COMMENTS* R-TACK communication wires betwee
LANDED. Amec Foster Wheeler / Wood needs to co

Figure 10: DC Battery Inspection Sheet

d. **Inverters:** The Plant had record of only 4 out 86 (4.65%) inverters inspections in 2024, and no records for 2025. Although not adhered to, other pieces of equipment, like Solar trackers and Transformers had a maintenance plan with the required frequency. For inverters, there was no plan in place to conduct inspection and maintenance activities at any interval. The Plant must establish and execute an inspection and maintenance plan for all inverters on site. The plan must follow the vendor manuals recommended inspection and maintenance activities and frequency. For example, annual torque verification of electrical connections on inverters and combiner boxes. Per the OEM inverter installation manual section 11.3 an annual inspection is to be performed by the Plant. This includes an annual torque check on both the AC & DC terminals. Verifying that they are still within the proper torque value will ensure that each inverter operates more reliably. Annual torque checks ensure electrical integrity, reduce the risk of overheating or arcing, maintain system

efficiency, protect against costly downtime, and may preserve warranty compliance for both inverters and DC combiner boxes. As a part of the corrective action plan submitted to ESRB, the Plant must provide the maintenance plan including all work orders, their designated frequency, and the work plans for each work order

TMEIC 4GBG0688

11.3. Annual Inspection

Annual inspections consist of external inspection and functions inspection as specified below. Please consider this as a reference. Inspected items may change according to local practices. This inspection should be performed by qualified personnel certified by TMEIC.

No.	Inspection subject	Inspection point			Judgment criteria
		Inspection item	Period	Inspection method	
1	External inspection	Damage or corrosion on the outside of the enclosure, loose bolts	1 year	Visual inspection	No damage or corrosion. No loosening of bolts by confirming unbroken torque marks.
2		Damage on external wiring and loose of connections	1 year	Visual inspection	No abnormalities in wiring. No loosening of screws.
3		Noise, vibrations and smell when operating	1 year	Visual inspection	No abnormal noise, abnormal vibrations or smell when operating.
4		Damage on grounding wiring and loose grounding connections	1 year	Visual inspection	No abnormalities in grounding wiring. No loosening of screws.
5	Functional inspections	Operation check	1 year	Inverter operation	Start/Stop functions are working properly and that the inverter status is reflected on the display/LEDs accordingly.
6	Physical Inspections	DC and AC terminals	1 year	Torque check	Check that the DC and AC terminals are tightened at the proper torque value.

Figure 11: OEM Inverter Manual Annual Inspection Table 11.3

Finding 4: Spill Prevention Control and Countermeasure inspections are not being completed.

GO 167-C, Appendix D, OS 3: Operations Management and Leadership states:

> *"Operations management establishes high standards of performance and aligns the operations organization to effectively implement and control operations activities."*

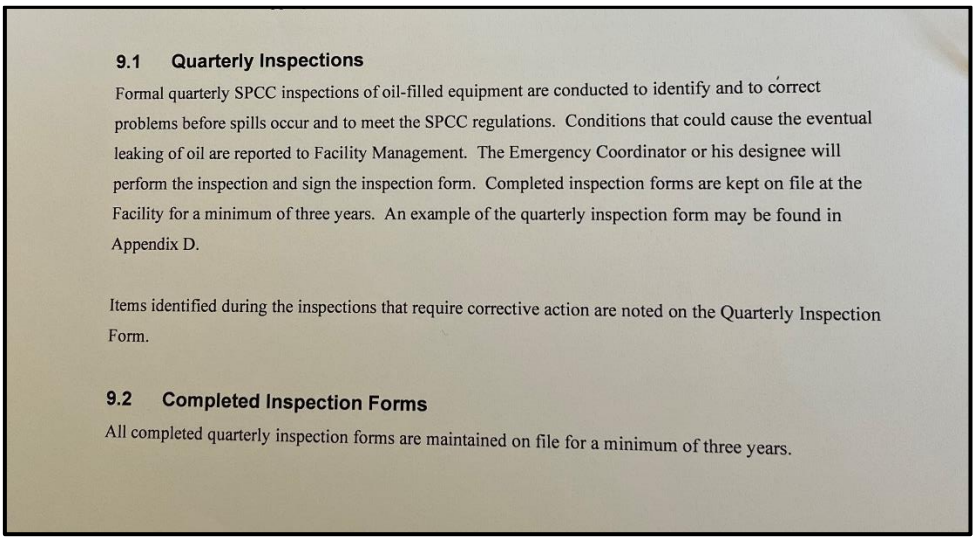
GO 167-C, Appendix D, OS 10: Environmental Regulatory Requirements states:

"Environmental regulatory compliance is paramount in the operation of the facility. Each regulatory event is identified, reported and appropriate action taken to prevent recurrence."

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. Results of data collection and monitoring of parameters during routine inspections are utilized to identify and resolve problems, to improve facility operations, and to identify the need for maintenance."

The approved SPCC required the Plant to conduct Quarterly Inspections of the Plant's oil filled equipment and containment area, to identify issues and correct any problems before a spill occurs. Each Medium Voltage Transformer and Generation Step Up Transformer is filled with Envirotemp FR3 and has a containment area. Quarterly Inspections of such oil-filled equipment have not been completed since July of 2024. The Plant must conduct these inspections and maintain record of the inspection for a minimum of three years.



9.1 Quarterly Inspections

Formal quarterly SPCC inspections of oil-filled equipment are conducted to identify and to correct problems before spills occur and to meet the SPCC regulations. Conditions that could cause the eventual leaking of oil are reported to Facility Management. The Emergency Coordinator or his designee will perform the inspection and sign the inspection form. Completed inspection forms are kept on file at the Facility for a minimum of three years. An example of the quarterly inspection form may be found in Appendix D.

Items identified during the inspections that require corrective action are noted on the Quarterly Inspection Form.

9.2 Completed Inspection Forms

All completed quarterly inspection forms are maintained on file for a minimum of three years.

Figure 12: Panoche Valley Solar SPCC Section 9.1 Quarterly Inspections

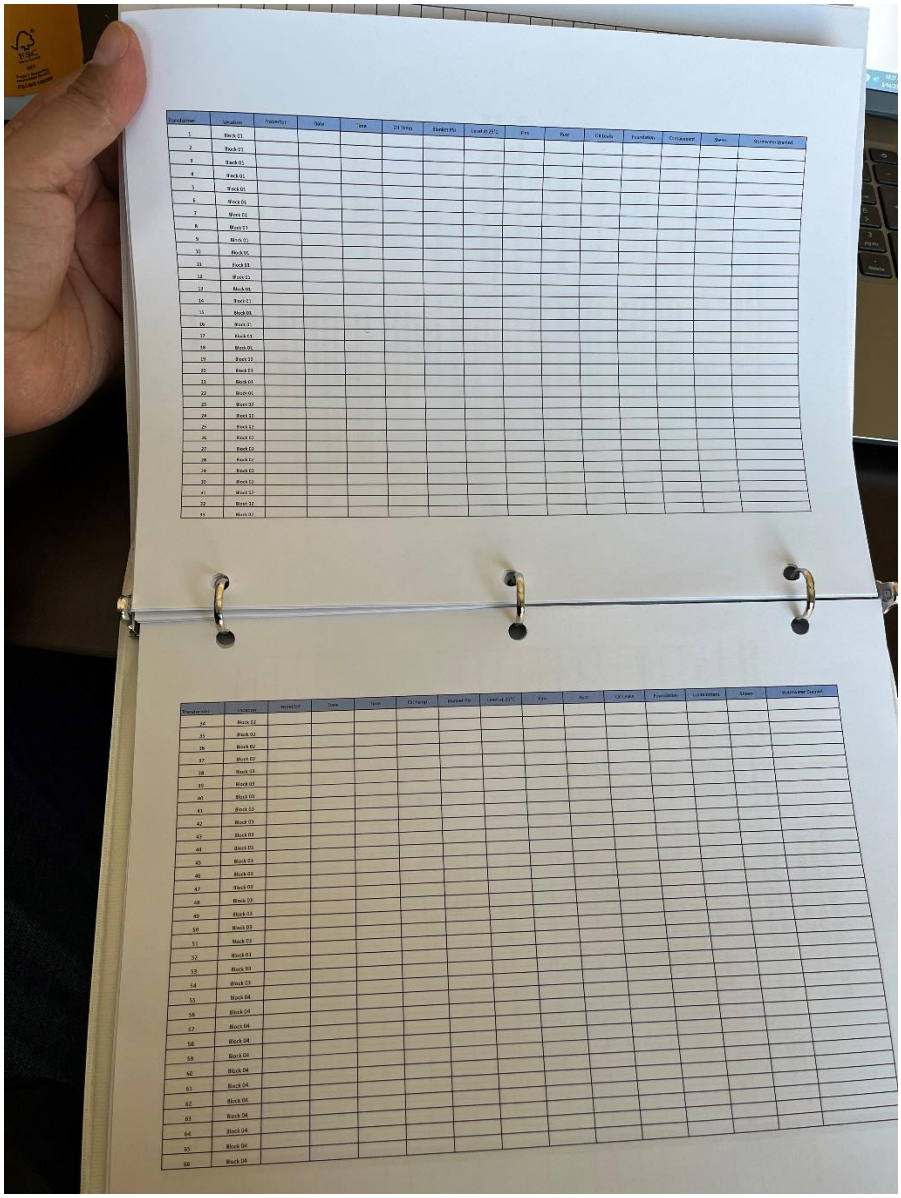


Figure 13: SPCC Quarterly Inspection Form

Finding 5: Confined space equipment list shows known issues on the generator have not been corrected.

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

> *"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 C, MS 3: Maintenance Management and Leadership states in part:

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

GO 167-C, Appendix D, OS 4: Problem Resolution and Continuing Improvement states:

"The GAO and ESSO value and foster an environment of continuous improvement and timely and effective problem resolution."

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

"Station activities are effectively managed so plant status and configuration are maintained to support reliable and efficient operation."

ESRB Inspectors identified, through the review of confined space equipment lists, that ongoing issues with the backup generator, which would support confined space rescues, had not been addressed for several years. Documentation stated that the generator has a cut ignition wire and will not operate in the event a confined space rescue needs to be conducted. The generator would not be unable to support the effort and put the safety of those involved into jeopardy, or any other event that would require the use of the generator. The Plant must ensure that it follows its own policies to create appropriate work orders for identified equipment in need of repair and complete the work identified in those orders in a timely manner. As a part of the Plant's corrective action plan, the plant must provide proof of repair, and that the generator is in working condition.

Finding 6: The Plant lacks knowledge and use of the corporate (RWE) policies and requirements

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

"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 2: Organizational Structure and Responsibilities states:

"The organization with responsibility and accountability for establishing and implementing an operation strategy to support company objectives for reliable plant 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."

Guidelines for Standard 2: Organizational Structure and Responsibilities states in part:

"H. Personnel are adequately trained and equipped to mitigate the consequences of normal or emergency conditions and to manage reasonably anticipated emergency situations."

GO 167-C, Appendix D, OS 3: Operation Management and Leadership states:

"Operations management establishes high standards of performance and aligns the operations organization to effectively implement and control operations activities."

GO 167-C, Appendix D, OS 4: Problem Resolution and Continuing Improvement states:

"The GAO and ESSO value and foster an environment of continuous improvement and timely and effective problem resolution."

GO 167-C, Appendix D, OS 5: Operations Personnel Knowledge and Skills states:

"Operations personnel are trained and qualified to possess and apply the knowledge and skills needed to perform operations activities that support safe and reliable facility operation"

GO 167-C, Appendix D, OS 6: Training Support states:

"A systematic approach to training is used to achieve, improve, and maintain a high level of personnel knowledge, skill, and performance. Each GAO and ESSO provides a site-specific training program including on-the-job training, covering operations, including reasonably anticipated abnormal and emergency operations. Personnel are trained to ensure safe and reliable facility operation."

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. Procedure shall be reviewed annually to ensure current procedures are up-todate and OEM recommendations are implemented."

GO 167-C, Appendix D, OS 12: Operations Conduct states:

"To ensure safety and optimize facility availability, the facility conducts operations systematically, professionally, and in accordance with approved policies and procedures. The facility takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to

follow facility and operation procedures and instructions while taking responsibility for safety. Among other things:

> *a) All personnel follow approved policies and procedures. Procedures are current and include a course of action to be employed when an adopted procedure is found to be deficient.*
>
> *b) All operations are performed in a professional manner. Professional conduct applies throughout the facility site at all times.*
>
> *c) All personnel on duty are trained, qualified, and capable of performing their job functions. Personnel are assigned only to duties for which they are properly trained and qualified.*
>
> *d) Personnel take immediate actions to prevent or correct unsafe situations. Anyone shall have the right to stop work if they see an unsafe condition."*

The Plant provided extensive documentation across all areas (Health and Safety, Training, Site Security, and O&M) that included many outdated items from previous ownership that are no longer applicable. Plant staff were unaware of some of the policies and procedures they should be using from RWE Renewables including in the areas of health and safety, and security. Figure 14 shows an example of outdated documentation. The Emergency Action Plan that was supplied to ESRB inspectors which is not aligned with RWE and does not meet the timely review and revision criteria specified in RWE Renewables' policies and procedures. Despite RWE Renewables' purchase of the Plant in 2023, the Plant has not adopted RWE's practices, policies or procedures. RWE Renewables is still actively conducting its Site Maturity Assessment of the Plant, which may resolve these issues, but it has not yet been completed.

In the absence of the timely implementation of clear and concise RWE Renewables policies and procedures, there are several gaps in areas that are critical to the safe and reliable operation of the Plant. The Plant owners must ensure its staff and management are aware and trained on the correct policies and procedures and implementing those appropriately. As part of the correction action plan, the Plant must complete the Site Maturity Assessment and follow through with resolving any issues discovered during that process and submit the assessment records along with corrective actions taken or to be taken to ESRB.

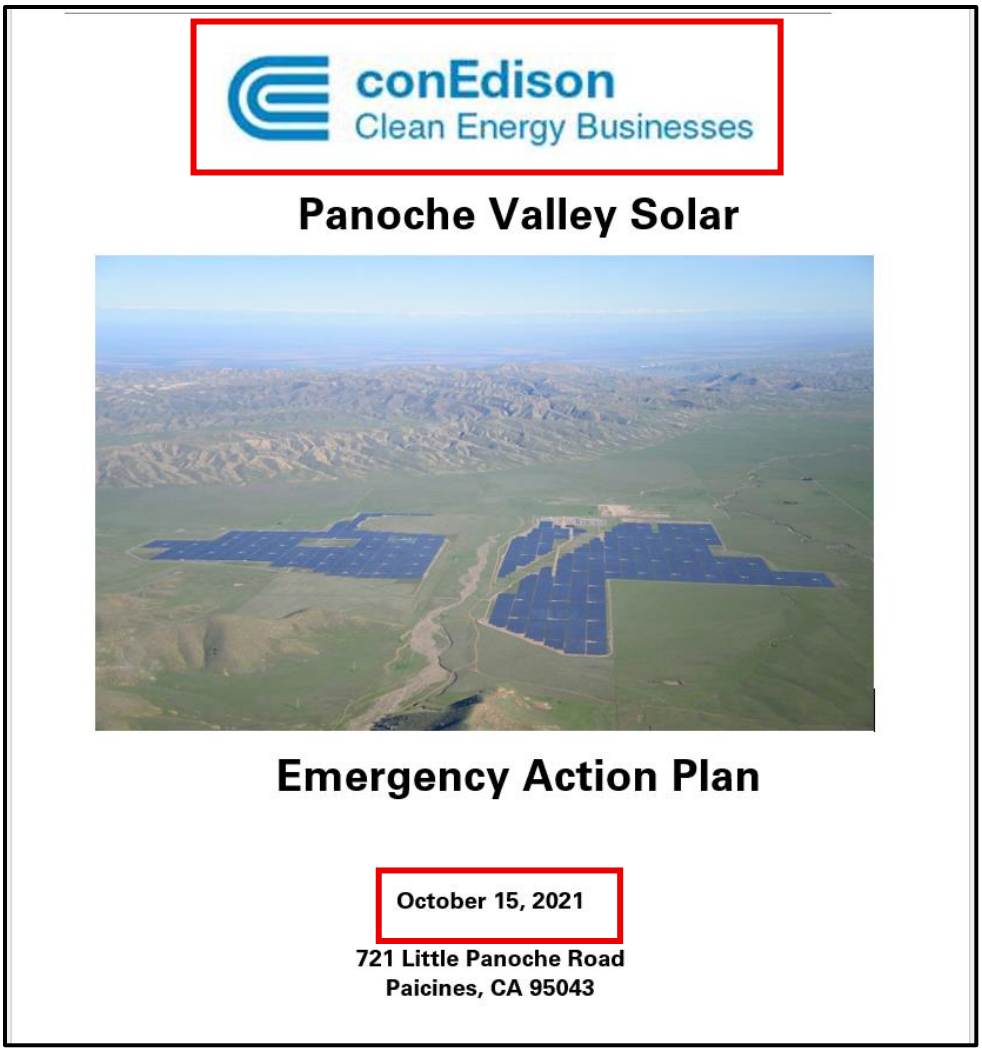


Figure 14: Supplied Emergency Action Plan Cover Page

Finding 7: The Plant hires contractors that are not approved by ISN as required by RWE.

GO 167-C Appendix D, OS 2: Organizational Structure and Responsibilities states:

"The organization with responsibility and accountability for establishing and implementing an operation strategy to support company objectives for reliable plant 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 D, OS 7: Operation Procedures and Documentation states in part:

"Procedures are current to the actual methods being employed to accomplish the task."

RWE policies require facilities to acquire contractors through ISN, a contractor and supplier management platform used to aid the Plant in prequalification and compliance assessment. ESRB Inspectors identified that the inverter contractor the Plant has been using, CNA, is not an approved contractor in the ISN network, nor was it identified in the supplied list of approved on site contractors shown in Figure 15. Using the approved methods that are in place to vet and track the quality of contractors is critical to safe and reliable plant operation. The Plant must utilize its own policies and procedures and use the approved methods to hire and retain contractors.

Figure 15: Inverter Maintenance Contractor CNA is Not On the Supplied Approved Contractor List

Finding 8: The Operations and Maintenance (O&M) building was missing Portable Fire Extinguishers in a designated location.

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 20: Startup, Shutdown, and Load Changes 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. Among other things, the GAO or ESSO:

c) Ensures provision of emergency information and materials to personnel;"

GO 167-C requires generating asset owners to maintain effective safety measures, including proper placement and accessibility of fire protection equipment. During the site visit, it was observed that a fire extinguisher was missing from its designated location inside the O&M building. This represents a safety hazard, as safety equipment is not available to the Plant and could delay emergency response in the event of a fire. A fire extinguisher must be placed in the indicated location immediately.

Figure 16: Fire extinguisher missing

Finding 9: No signage to identify muster points.

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

> *"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site."*

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

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

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. Among other things, the GAO or ESSO: […]*
>
> *C. Ensures provision of emergency information and materials to personnel."*

Muster points are not identified in their current site safety orientation as shown in Figure 17, and while on site, ESRB inspectors were unable to locate clear signage indicating the location of the physical muster points on site. In the event of an emergency, clear identification of muster points is critical for on-site individuals to quickly and efficiently locate a muster point. As part of its corrective action plan, the Plant must identify muster points on site maps and have physical signage indicating muster points for on-site individuals.

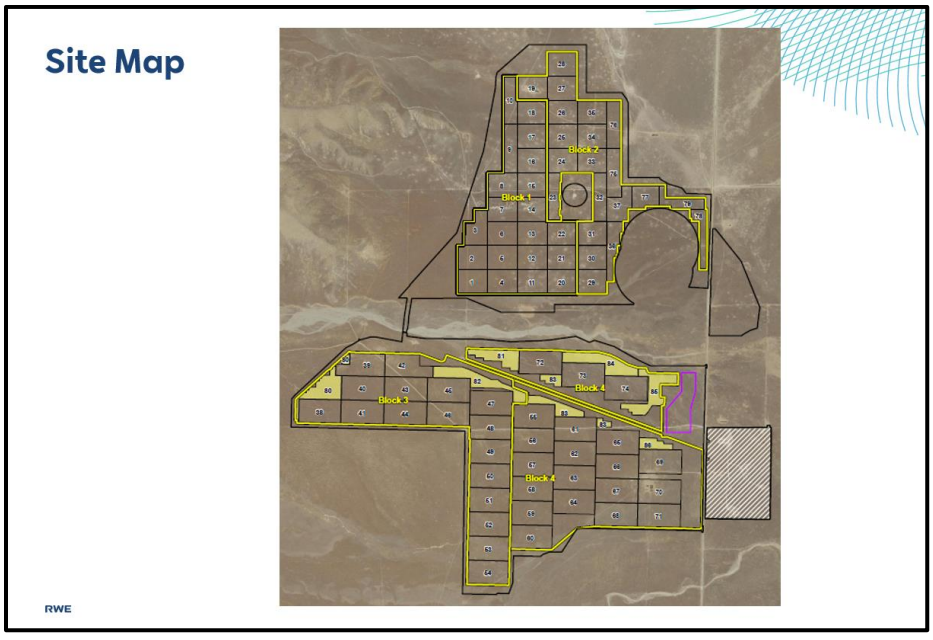


Figure 17: Site Map in Orientation in Presentation Missing Muster Points

II. 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	MSDS 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 Inspection Record and Fire Sprinklers Test Report (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
Training	18	Safety Training Records*
	19	Skill-related Training Records*
	20	Certifications for Welders, Forklift & Crane Operators*
	21	Hazmat Training and Record*
Contractor	22	Latest list of Qualified Contractors*
	23	Contractor Selection / Qualification Procedure
	24	Contractor Certification Records
	25	Contractor Safety Program Procedure and Training Records
Regulatory	26	Water Permit (if applicable)
	27	Spill Prevention Control Plan (SPCC) (if applicable)
	28	CalARP Risk Management Plan (RMP)

O&M	29	Daily Round Sheets / Checklists**
	30	Logbook**
	31	List of Open/Backlogged Work Orders*
	32	List of Closed/Retired Work Orders (last 3 years)*
	33	Work Order Management Procedure (last 3 revisions, if applicable)
	34	Computerized Maintenance Management System**
	35	All Root Cause Analyses (if any)
	36	Maintenance & Inspection Procedures, or Related Documents
	37	SCADA system (Demonstration On-site)**
	38	Maintenance and Inspection Records for Solar Inverters
	39	Maintenance and Inspection Records for Solar Trackers
	40	Maintenance and Inspection Records for Solar Arrays/Collectors/Solar Field
	41	Maintenance and Inspection Records for Mounting System
	42	Maintenance and Inspection Records for Switchgear/breaker/relays
	43	Maintenance and Inspection Records for Electrical System
	44	Maintenance and Inspection Records for Main Transformer(s)
	45	Maintenance and Inspection Records for Switchyard & Transmission Equipment
	46	Maintenance and Inspection Records for other equipment
	47	Transformer Oil Analysis Records (last 3 years)
	48	Emergency Generator Test and Maintenance Records (last 3 years)
	49	Substation Battery Test and Maintenance Records (last 3 years)
	50	Vegetation Management Procedure and Policy
Documents	51	P&IDs* (Electric Schematic Diagram of substation, solar arrays, BESS)
	52	Vendor Manuals*
	53	Solar Farm Equipment Design Data
	54	Procedure Compliance Policy
Spare Parts	55	Spare Parts Inventory List
	56	Shelf-life Assessment Report
Management	57	Organizational Chart
Instrumentation	58	Instrument Calibration Procedures and Records
Test Equipment	59	Measuring & Testing Equipment List
	60	Test Equipment Calibration Procedures and Records
Internal Audit	61	Internal Audit Procedures and all Records

* Provide data in a searchable format such as a searchable PDF, Word Document, Excel Spreadsheet, etc.

** These items may be provided on-site by the first day of the audit.