PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

January 21, 2026

Jason King
Plant Manager
Pio Pico Energy Facility

SUBJECT: **General Order (GO) 167-C Audit of Pio Pico Energy Facility, Audit Number GA2025-14PP**

Dear Jason King:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emmanuel Salas and Evan Coughran of ESRB staff conducted a generation audit of Pio Pico Energy Facility from December 9 through December 11, 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 February 19, 2026, 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 achieve full compliance with GO 167-C.

Please submit your response to Emmanuel Salas at emmanuel.salas@cpuc.ca.gov. Please note that although Pio Pico Energy Facility 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 Pio Pico Energy Facility 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 Emmanuel Salas with a copy to me and the GO-167 inbox GO167@cpuc.ca.gov by February 19, 2026.

Please note that ESRB will also post the Pio Pico Energy Facility 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 Emmanuel Salas at emmanuel.salas@cpuc.ca.gov or (916) 347-6415.

Sincerely,

Stephen Hur, 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, Deputy Executive Director of Safety and Enforcement Division, Safety Policy and Water, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Emmanuel Salas, Utilities Engineer, ESRB, SED, CPUC
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF
PIO PICO ENERGY FACILITY
DECEMBER 9 – DECEMBER 11, 2025

I. Findings Requiring Corrective Actions.

Finding 1: Fire evacuation drills are not being conducted or recorded.

General Order (GO) 167-C, Appendix D, Operation Standard (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 17: Records of Operation states:

> *"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."*

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:*
>
> *a) Plans for the continuity of management and communications during emergencies, both within and outside the facility*
> *c) Ensures provision of emergency information and materials to personnel"*

Pio Pico Energy Facility (PPEF) is not consistently conducting fire evacuation drills as required by the Safety Manual Procedure (SMP)-002 Emergency Response Plan (ERP). PPEF was unable to provide records demonstrating that evacuation drills are performed at the required frequency or that drill evaluations have been completed. Evacuation drills are essential to ensure that employees understand alarm recognition, evacuation routes, and muster point locations during an emergency. Emergency drills also allow PPEF management to identify and remedy issues with their emergency systems and procedures in a controlled environment.

PPEF must schedule and conduct fire evacuation drills in accordance with the requirements of SMP-002 and ensure that each drill is formally documented. Documentation must include the date of the drill, participating personnel, and any identified lessons learned or corrective actions.

Additionally, PPEF must provide a fire evacuation drill schedule for planned future drills, including drills planned for 2026.

Finding 2: Visitor and contractor orientation is missing site-specific emergency and safety information.

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 in part:

> *"Operation procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation…"*

During the documentation review, Electric Safety and Reliability Branch (ESRB) inspectors noted that the visitor and contractor orientation lacks critical site-specific emergency and safety information. The visitor and contractor orientation does not include emergency contact phone numbers, emergency response information, or the locations of automated external defibrillators (AEDs), first aid kits, and fire extinguishers on the site map. In addition, the visitor and contractor orientation did not address site-specific wildlife hazards, including the potential presence of snakes.

ESRB inspectors also noted that the facility evacuation route diagram included in the SMP-002 ERP and the facility map included in the visitor and contractor orientation, show inconsistent muster point locations. Inconsistent identification of muster points may create confusion during an emergency and hinder effective evacuation. Providing complete, accurate, and consistent site-specific information is essential to ensure that visitors and contractors can safely respond to emergencies and understand hazards prior to accessing the facility.

PPEF must revise the visitor and contractor orientation to incorporate site-specific emergency contact information, emergency response procedures, locations of emergency equipment, and relevant site-specific hazards. PPEF must also update the facility maps included in the visitor and contractor orientation and the facility evacuation route diagram in the SMP-002 ERP to ensure that muster point locations are accurate and consistent across all documents. PPEF must submit the updated visitor and contractor orientation and revised facility maps to ESRB for review.

Finding 3: Required inspections are not consistently completed or documented.

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 11: Operations Facilities, Tools, and Equipment states:

"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage. Physical separation such as, but not limited to, egress requirements, clearance for electrical equipment, and ESS equipment shall be maintained."

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

"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. All personnel are trained in the routine inspection procedures relevant to their responsibilities. Among other things, each GAO or ESSO creates, maintains, and implements routine inspections by:

a) Identifying systems and components critical to system operation such as, but not limited to, those listed in the guidelines to Operating Standard 28.
b) Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels.
c) Training personnel to conduct routine inspections.
d) Monitoring and conducting trend analysis from routine inspections."

GO 167-C, Appendix D, OS 17: Records of Operation states:

"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."

PPEF is not consistently implementing or following the SMP-06 Safety Inspections and Assessments. SMP-06 Safety Inspections and Assessments identify a wide range of inspections that PPEF must complete and their specified intervals. PPEF must fully implement SMP-06 by ensuring all required safety inspections are conducted as specified and formally documented or SMP-06 must be updated to match the inspections needed for plant safety. Inspections must be recorded and tracked to ensure continued compliance.

Finding 4: Documentation for RCA corrective actions was not available.

GO 167-C, Appendix C, Maintenance Standard (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 14: Engineering and Technical Support states:

> *"Engineering and technical support activities are conducted such that equipment performance is optimized for reliable facility operation. Engineering and technical support implements industry best practices, lessons learned, proven safety measures, and technical information necessary for the facility to be operated and maintained within the operating parameters defined by facility design."*

During the documentation review, ESRB inspectors reviewed the Root Cause Analysis (RCA) and Post Event Review for the [redacted] Stage 1 Nozzle event, which documented the investigation of equipment distress and associated maintenance and crane-related activities during repair efforts, dated March 17, 2022, through October 27, 2022. The RCA identified multiple corrective actions intended to address deficiencies associated with maintenance practices, maintenance oversight, crane operations, and tool accountability. These actions included focusing on a site culture that is methodical in maintenance activities to improve quality, improving maintenance oversight inclusive of contractor and site personnel activities, and implementing a tool control program with a focus on tool accountability and tooling used to swap the [redacted]

ESRB requested documentation describing how these identified corrective and preventive actions were implemented and how their effectiveness was tracked, however, PPEF was unable to provide the requested documentation. Without documentation showing implementation of these actions, ESRB is unable to verify that the issues identified in the RCA were systematically addressed or that measures were put in place to prevent the recurrence of similar events. Documenting the implementation of corrective and preventive actions resulting from RCAs is necessary to support continuous improvement, maintenance oversight, and reliable facility operation. PPEF must submit documentation to ESRB describing how the corrective actions identified in the RCA were implemented. In addition, PPEF must also establish and document a process to ensure that future corrective and preventive actions resulting from RCAs are implemented and tracked, and submit the relevant procedure or policy as evidence

Finding 5: Worker training records are not adequately tracked.

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 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 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."

During the audit, ESRB inspectors observed that PPEF employee training tracking and verification lacks consistency and verification from management. Training records must be tracked for each employee with retraining dates known so there is no lapse in training. Incomplete training records limit the site's ability to confirm personnel qualifications and identify outstanding training requirements. PPEF management must also ensure that all employees receive the proper training on time and that employees are aware of the training they are required to complete and when they must be redone. PPEF must improve its training tracking process to document required training, completion status, and management verification.

Finding 6: [redacted] for [redacted] and [redacted] are leaking oil.

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 Material Condition states:

"Equipment performance and material 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."

During the field inspection, ESRB inspectors observed oil leaks on the [redacted] serving [redacted] and [redacted] Unaddressed oil leaks can create safety hazards in the form of slip hazards, damage equipment, and reduce overall efficiency and reliability of the units. Lubrication oil is essential for the safe and efficient operation of gas compression equipment. PPEF must evaluate the observed oil leaks and submit documentation to ESRB describing the corrective actions taken to address the leaks, including evidence demonstrating that the condition has been corrected.

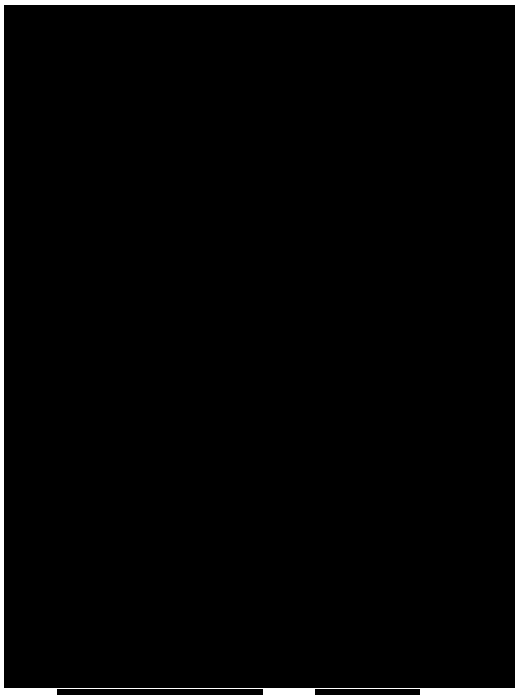

Figure 1: [redacted] for [redacted] leaking oil.

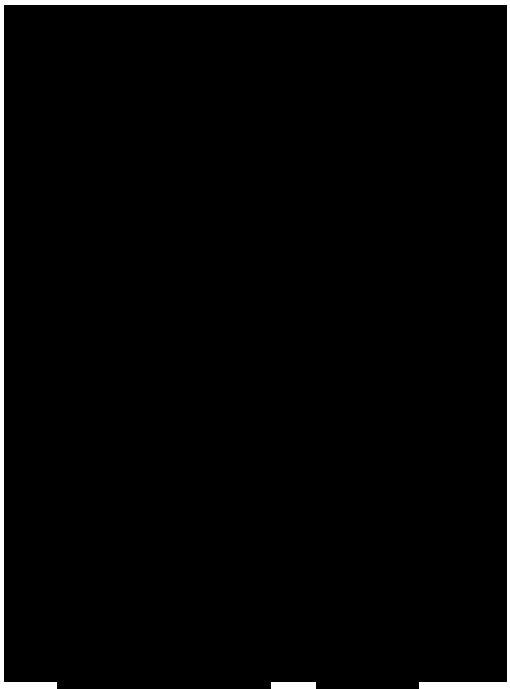

Figure 2: [redacted] for [redacted] leaking oil.

Finding 7: Poor Air oil analysis results for site [redacted]

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 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:

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

"Equipment performance and material 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."

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."

The [redacted] oil analysis results between 2024 and 2025 have shown multiple poor readings over successive samples. PPEF has elected to switch methods of collecting oil samples for analysis with the theory that samples are being contaminated during the sample collections. PPEF will take their first set of oil samples with the new sampling technique in quarter 1 of 2026. PPEF has also replaced all the oil in each of the sites [redacted] due to the poor results. Although the oil and sampling methods were changed, follow-up oil analysis results demonstrating acceptable conditions were not yet available at the time of the audit. Without confirmation of clean results, the effectiveness of the corrective actions cannot be verified.

PPEF must continue oil analysis sampling and monitoring until acceptable results are achieved and documented. PPEF must verify that the corrective actions have resolved the underlying issue and, once available, submit the first compressor oil analysis results utilizing the new oil sampling method.

Finding 8: Cathodic protection deficiencies identified in prior surveys remain unresolved.

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 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 Material Condition states:

> *"Equipment performance and material 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."*

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."*

Cathodic protection surveys identified a short on the [redacted] in both the survey conducted in 2023 and 2024, indicating that the condition has not been corrected. The survey for 2022 was also missing from PPEF records. Repeated identification of the same deficiency over multiple survey cycles demonstrates a lack of effective problem resolution and increases the risk of accelerated corrosion and potential [redacted] integrity issues. PPEF management explained to ESRB inspectors that the issue has not yet been resolved and is expected to be identified again in the

2025 survey, which had been conducted but not yet given to the Plant. PPEF management explained that plans are being made to remedy this issue, including obtaining quotes but no corrective actions had been completed at the time of the audit. PPEF must fix the identified issues in the 2023 and 2024 surveys and any additional issues found during the 2025 survey and provide documentation to ESRB describing the corrective actions taken to address the leaks, including evidence demonstrating that the condition has been corrected. PPEF must also implement procedures to track issues identified during inspections and submit them to ESRB for review and verification.

Finding 9: Expired hot stick found in the [redacted].

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 11: Operations Facilities, Tools, and Equipment states:

> *"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage. Physical separation such as, but not limited to, egress requirements, clearance for electrical equipment, and ESS equipment shall be maintained."*

During the audit, ESRB inspectors observed a hot stick stored in the [redacted] that had exceeded its required testing interval. Hot sticks are critical insulating tools that require testing to ensure they maintain the proper electrical protection. Expired equipment creates a risk that personnel could unknowingly use tools that no longer meet safety requirements. PPEF must remove the expired hot stick from service and ensure that all applicable safety equipment is maintained, tested, and documented in accordance with established requirements. PPEF must also develop and implement a method to track inspection and test dates for safety equipment to prevent expired equipment from remaining available for use and must submit documentation to ESRB describing the corrective actions taken and the tracking method implemented.

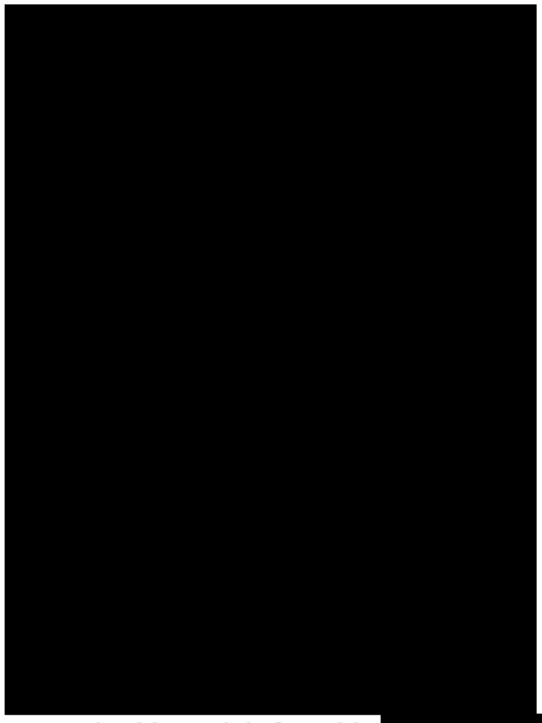

Figure 3: Expired hot stick found in [redacted]

Finding 10: [redacted] drum is missing an accumulation start date.

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."

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

"Environmental regulatory compliance is paramount in the operation of the facility…

Title 22, California Code of Regulations (CCR), section 66262.16(b)(4)(A)5 states in part:

"A small quantity generator shall mark or label its containers with the following:

5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container…"

During the field inspection, ESRB inspectors noted a [redacted] drum located in the [redacted] that did not have an accumulation start date marked on the container. PPEF cannot rely on shipping or disposal dates as a substitute for an accumulation start date. Failure to clearly mark [redacted] containers with accumulation start dates prevents PPEF from accurately tracking [redacted] storage timeframes and undermines effective [redacted] management and regulatory compliance. PPEF must ensure that all [redacted] containers are properly labeled with an accumulation start date at the time waste is first placed in the container.

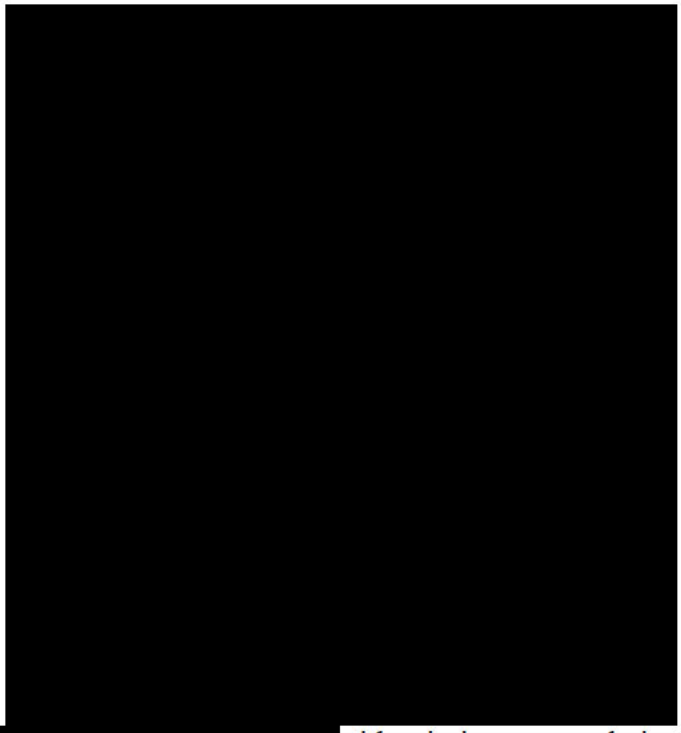

Figure 4: [redacted] with missing accumulation start date.

Finding 11: Improper disposal of oil-contaminated materials.

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 12: Operations Conduct states in part:

"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…"

Health and Safety Code (HSC), section 25250.5(a) states in part:

"The disposal of used oil by deposit on land, is prohibited, unless authorized under other provisions of law."

During the field inspection, ESRB inspectors observed an oil-contaminated absorbent pad discarded in a general trash receptacle near the [redacted] area. PPEF did not dispose of oil-contaminated absorbent materials in a designated and appropriate waste container. Improper disposal of oil-soaked materials creates a housekeeping deficiency and increases the risk of secondary contamination and fire hazards, and it does not demonstrate effective implementation of facility environmental and safety controls. PPEF must ensure that oil-contaminated absorbent materials are disposed of in designated and appropriate waste containers in accordance with safe maintenance and environmental practices.

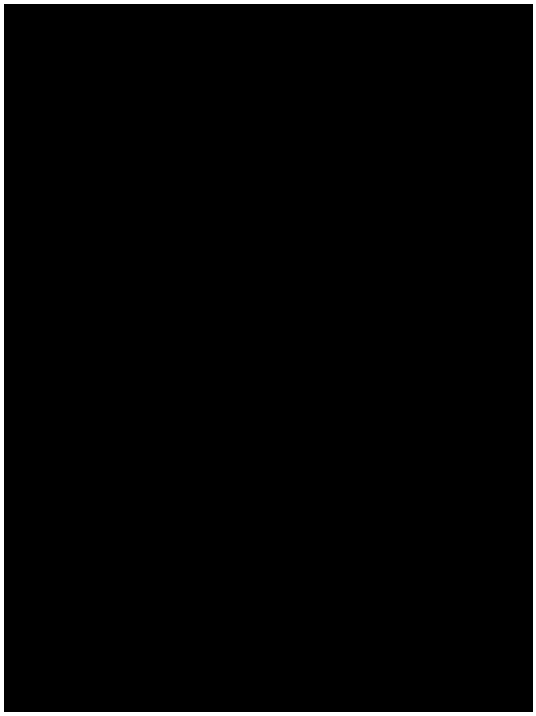

Figure 5: Oil-contaminated absorbent pad discarded in a general trash receptacle

Finding 12: Oil rag container is not being emptied in accordance with posted instructions.

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

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GO 167-C, Appendix D, OS 11: Operations Facilities, Tools, and Equipment states:

> *"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage. Physical separation such as, but not limited to, egress requirements, clearance for electrical equipment, and ESS equipment shall be maintained."*

ESRB inspectors observed that the oil rag containers in the [redacted] are not being emptied nightly as required by the manufacturer's instructions posted on the container. Oily rags present a fire hazard, and failure to follow posted disposal instructions increases the potential for fire risk. PPEF must ensure that all oil rag containers are emptied each night in accordance with posted instructions and that this requirement is incorporated into routine housekeeping practices. PPEF must submit documentation to ESRB demonstrating that this requirement has been incorporated into routine housekeeping.

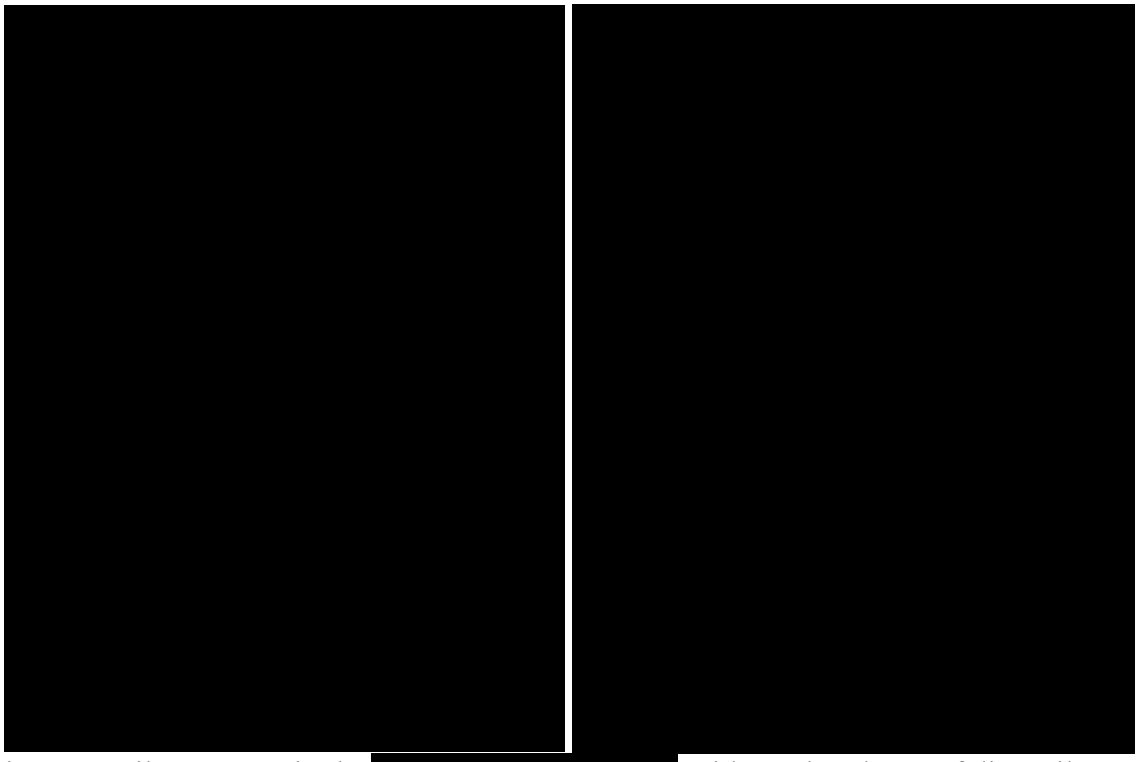

Figure 6: Oil waste can in the [redacted] with an abundance of dirty oil rags.

Finding 13: Active equipment alarm on wastewater treatment [redacted]

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 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."*

During the field inspection, ESRB inspectors noted that the wastewater treatment [redacted] is displaying an active "service now" alarm on the equipment interface. Active equipment alarms indicate that equipment conditions require evaluation and resolution to ensure continued safe and reliable operation. Timely identification and resolution of equipment alarms

are necessary to maintain proper equipment condition and to prevent degradation of system performance.

PPEF must conduct routine inspections to identify and resolve active equipment alarms. Additionally, PPEF must evaluate the cause of the active alarm on the [redacted] and submit documentation to ESRB describing the corrective actions taken to address the alarm and demonstrating that the alarm condition has been resolved.

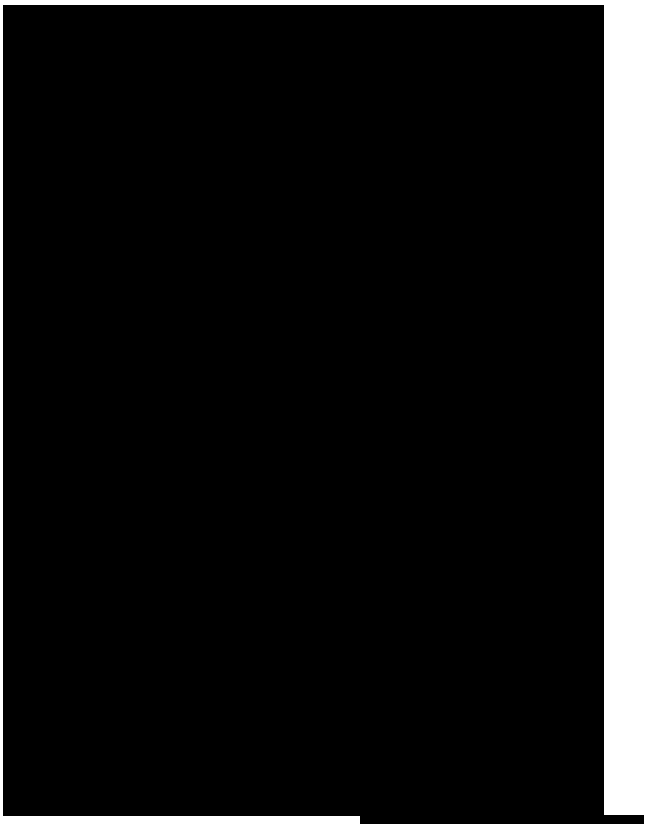

Figure 7: Wastewater treatment [redacted] displaying an active "service now" alarm.

Finding 14: Unlocked [redacted] in the [redacted]

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."

During the field inspection, ESRB inspectors observed that [redacted] located in the [redacted] was not properly locked. Unlocked [redacted] increase the potential for unauthorized access and unintended operation of electrical equipment. Securing [redacted] is an important control to support safe operation and protect electrical equipment from inadvertent operation or interference. PPEF must ensure that all [redacted] are properly locked and submit documentation to ESRB demonstrating that [redacted] has been properly secured.

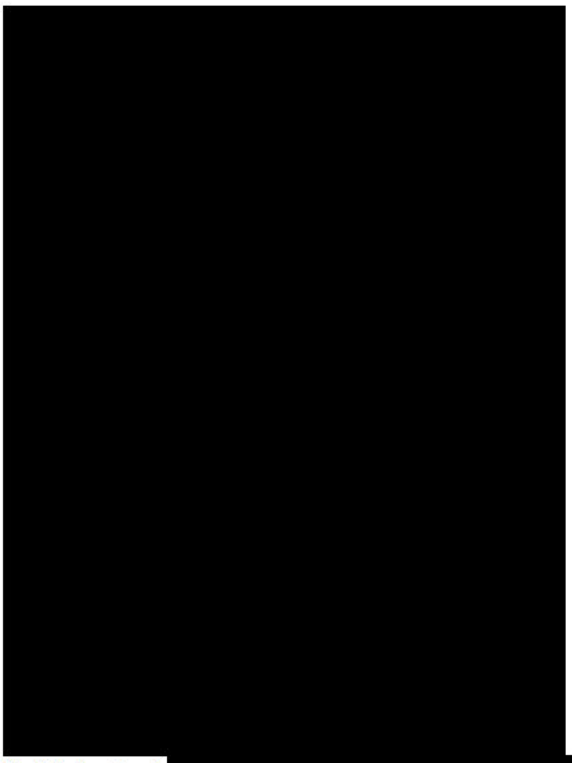

Figure 8: Unlocked [redacted].

Finding 15: A Flammable storage cabinet does not self-close, and self-latch.

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 11: Operations Facilities, Tools, and Equipment states in part:

"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage…"

National Fire Protection Association (NFPA) 1 60.1.2.23 (d) states:

"Doors shall be well fitted, self-closing, and equipped with a self-latching device."

During the field inspection, ESRB inspectors observed that a small flammable material storage cabinet at PPEF was not equipped with an automatic self-closing and self-latching door mechanism. Flammable storage cabinets are intended to limit fire propagation and reduce fire risk by ensuring cabinet doors close and latch automatically. Properly functioning flammable storage cabinets are an important fire protection control within operating facilities.

PPEF must ensure that all flammable material storage cabinets on site are fitted with self-closing and self-latching mechanisms and are in proper operating condition. PPEF must submit photographic documentation of the corrective action to ESRB for review and verification.

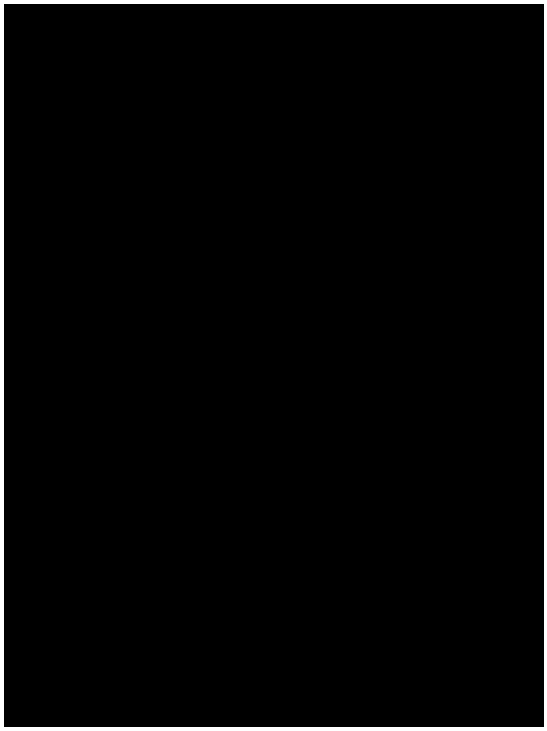

Figure 9: Flammable material storage cabinet without a self-closing mechanism.

Finding 16: Air purge gauge on [redacted] is not functional.

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 13: Equipment Performance and Material Condition states:

"Equipment performance and material 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."

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

> *"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. All personnel are trained in the routine inspection procedures relevant to their responsibilities. Among other things, each GAO or ESSO creates, maintains, and implements routine inspections by:*
>
> *a) Identifying systems and components critical to system operation such as, but not limited to, those listed in the guidelines to Operating Standard 28.*
> *b) Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels.*
> *c) Training personnel to conduct routine inspections.*
> *d) Monitoring and conducting trend analysis from routine inspections."*

During the audit, ESRB inspectors observed that the air purge pressure gauge on [redacted] was stuck at its maximum reading, indicating the gauge is not functional. A non-functional gauge prevents operators and maintenance personnel from accurately verifying purge pressure. PPEF must repair or replace the damaged air purge gauge on [redacted] and verify proper operation following replacement. PPEF must also ensure that gauges and instrumentation are periodically inspected to identify and correct similar deficiencies in a timely manner.

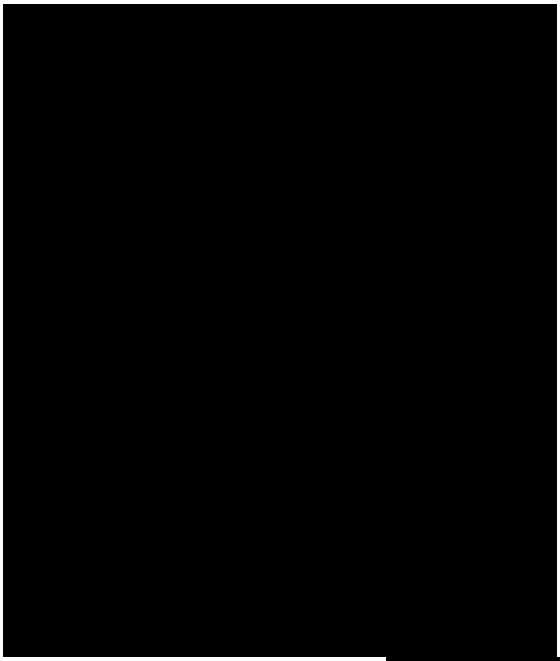

Figure 10: Air purge gauge maxed out on [redacted]

Finding 17: Expired [redacted] found in the [redacted]

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: 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:*
>
> *a) Plans for the continuity of management and communications during emergencies, both within and outside the facility*
> *c) Ensures provision of emergency information and materials to personnel"*

During the audit, an expired [redacted] bottle was observed, stored in the [redacted] with other nonexpired bottles of [redacted] is critical for verifying the accuracy of gas detection and monitoring equipment. Using expired [redacted] can result in inaccurate readings, which may compromise personnel safety and the reliability of gas detection systems. Having expired [redacted] the vicinity of nonexpired [redacted] can lead to the unknown use of expired [redacted] by plant personnel.

PPEF must remove expired [redacted] from service and ensure that only current, in-date [redacted] is stored and available for use. PPEF also must establish and implement a tracking or inspection process to routinely verify expiration dates and ensure that expired [redacted] materials are not retained in use or storage and provide the documented process to ESRB for review and verification.

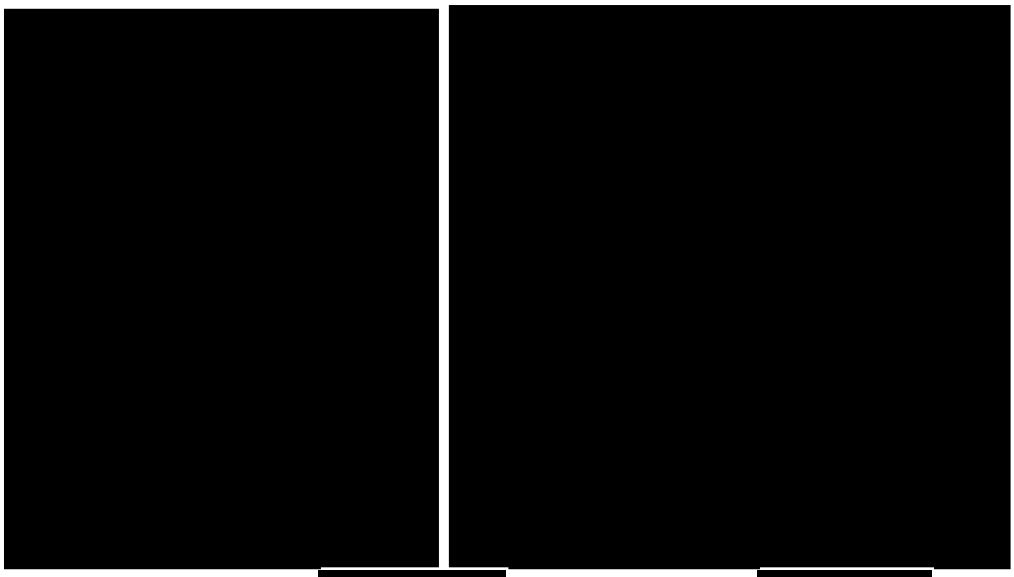

Figure 11: Expired [redacted] bottle found in the [redacted]

Finding 18: Work order tracking is not consistently updated or closed out.

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 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 17: Records of Operation states:

> *"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."*

ESRB inspectors observed that PPEF's work order management system is not being consistently updated or utilized efficiently. PPEF personnel is not properly utilizing the work order management system, leading to outdated and inconsistently tracked maintenance orders. Completed maintenance activities were not always properly documented or closed out in the

system. PPEF must ensure that all maintenance work orders are fully documented and closed out upon completion. The work order management process must track maintenance activities through completion to maintain accurate records.

The presence of outdated and inaccurately open work orders diminishes the effectiveness of the work order management system as a tool for planning, tracking, and prioritizing maintenance activities. A complete work order system is critical to ensure maintenance deficiencies are identified, tracked, and managed. PPEF must conduct a thorough review and cleanup of its work order management system to confirm that all open work orders accurately reflect current plant conditions. This review must include closing completed or obsolete work orders and verifying that all remaining work orders are active, valid, and appropriately documented. PPEF must also provide ESRB with a written plan describing how backlogged work orders will be reviewed and addressed, along with confirmation once the review is complete and the work order system accurately reflects the facility's current maintenance status.

Finding 19: Infrared inspection results are not consistently tracked, stored, or trended for future review.

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 13: Routine Inspections states:

"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. All personnel are trained in the routine inspection procedures relevant to their responsibilities. Among other things, each GAO or ESSO creates, maintains, and implements routine inspections by:

a) Identifying systems and components critical to system operation such as, but not limited to, those listed in the guidelines to Operating Standard 28.
b) Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels.
c) Training personnel to conduct routine inspections.
d) Monitoring and conducting trend analysis from routine inspections."

GO 167-C, Appendix D, OS 17: Records of Operation states:

"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."

ESRB inspectors observed that infrared (IR) inspection results at PPEF are not being consistently tracked, centrally stored, or trended over time. The 2025 IR scan records of the [redacted] and [redacted] for the air-cooled [redacted] system were missing and not available for on-site review. 2024 records were also found to be missing several IR scans of the [redacted] and [redacted] IR inspections are an important predictive maintenance tool used to identify developing electrical and mechanical issues before failure occurs. Without consistent recordkeeping the facility cannot effectively use inspection data to support continuous improvement. PPEF must implement a process to ensure all IR inspection results are documented and stored in a centralized location to support future trend analysis and submit documentation of the implemented process to ESRB for review and verification. Additionally, PPEF must submit 2025 IR scans records of the [redacted] and [redacted] for the air-cooled [redacted] system.

Finding 20: Maintenance is not being consistently performed.

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."*

ESRB inspectors identified several instances in which PPEF did not consistently perform required preventive maintenance activities. Several [redacted] for the air-cooled condenser system had missed work orders related to routine lubrication and required quarterly inspections. These missing preventative maintenance measures included quarterly coupling guard checks, grounds checks, and semiannual recirculation pump lubrication. Preventive maintenance is necessary to ensure equipment reliability, prevent degradation, and identify issues before they result in failures. PPEF must ensure that all required preventive maintenance activities are performed at the specified frequency and that work orders are properly scheduled, completed, and closed. Management must also routinely review maintenance records to verify completion and address any recurring gaps in execution. PPEF must provide documentation that the quarterly coupling guard checks, grounds checks, and semiannual recirculation pump lubrication preventative maintenance has been conducted and is scheduled for their next needed intervals.

Finding 21: Inventory tracking does not adequately manage minimum/maximum levels or material shelf life.

GO 167-C, Appendix C, MS 12: Spare Parts, Material and Services states:

"Correct parts and materials are in good condition and are available for maintenance activities to support both forced and planned outages. Procurement of services and materials for outages are completed on time to ensure materials will be available without impact to the schedule. Storage of parts and materials support maintaining quality and shelf life of parts and materials."

GO 167-C, Appendix D, OS 11: Operations Facilities, Tools, and Equipment states:

"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage. Physical separation such as, but not limited to, egress requirements, clearance for electrical equipment, and ESS equipment shall be maintained."

PPEF's inventory tracking process does not consistently maintain accurate minimum and maximum stock levels and does not adequately monitor the shelf life of sensitive materials. Inaccurate inventory levels and lack of shelf-life tracking increase the risk of delays in maintenance.

PPEF must improve its inventory management process to ensure minimum and maximum stock levels are clearly defined and kept current and must implement controls to track shelf life for perishable materials and ensure expired materials are identified and removed from service. PPEF must submit documentation of the implemented inventory management controls to ESRB for review and verification.

Finding 22: Visitor sign-in process does not communicate physical access and BES cyber system restrictions.

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

"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…"

GO 167-C, Appendix D, OS 21: Plant Security states:

"To ensure safe and continued operations, each GAO or ESSO provides a prudent level of security for the facility, its personnel, operating information, communications, and stepping up security measures when necessary."

During the documentation review, ESRB inspectors reviewed the 2025 PPEF Physical Access Policy and the facility's visitor sign-in log process. The Physical Access Policy states:

"By signing into the plant visitor log, the Service Vendor agrees to adhere to the PPEF physical access policy and agrees to not access equipment or asset(s) containing Low Impact BES Cyber Systems or the Low Impact BES Cyber Systems themselves unless authorized by plant management."

However, ESRB inspectors noted that when visitors sign into the visitor log, there is no visible notice, acknowledgement language, or other communication informing them that signing the visitor log constitutes agreement to adhere to the PPEF Physical Access Policy or to the restrictions related to access of Low Impact Bulk Electric System (BES) Cyber Systems. As implemented, the visitor sign-in process does not communicate these requirements to visitors or vendors at the time of site entry.

Clear communication of physical access and BES Cyber System restrictions at the point of entry is necessary to ensure visitors and vendors understand the conditions and limitations associated with site access. PPEF must revise the visitor sign-in process to clearly communicate that signing the visitor log constitutes agreement to adhere to the PPEF Physical Access Policy and the associated restrictions on access to Low Impact BES Cyber Systems. PPEF must submit documentation to ESRB demonstrating how this information is communicated to visitors and vendors at the time of sign-in.

Finding 23: SPCC annual inspection documentation is incomplete and inconsistently maintained.

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 16: Regulatory Requirements states in part:

> *"Regulatory compliance is paramount in the operation of the facility…"*

During the documentation review, ESRB inspectors reviewed Spill Prevention, Control, and Countermeasure (SPCC) records maintained at the facility. ESRB inspectors noted that annual SPCC inspection documentation was missing for various years, that several inspection forms lacked dates, and that some annual inspection forms were not fully completed and were missing required inspection information, such as parameter readings necessary to document equipment condition.

Complete and properly maintained annual SPCC inspection records are necessary to demonstrate compliance with spill prevention requirements and to ensure that oil-containing equipment is routinely inspected and monitored. PPEF must ensure that annual SPCC inspections are performed, dated, completed in full, and properly maintained with the SPCC documentation. PPEF must develop and document a method or plan to ensure that required annual SPCC inspections are completed and properly documented and submit the documented method or plan to ESRB for review and verification.

Finding 24: Physical confined space procedure is outdated.

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

During the documentation review, ESRB inspectors noted that the confined space procedure maintained in the physical binder at the facility was outdated and did not reflect the most current approved revision. Procedures maintained in physical binders must be consistent with the current approved version to ensure personnel rely on accurate and up-to-date procedures when performing work activities. PPEF must inspect all physical procedure binders at the facility, update the confined space procedure and any other outdated procedures to reflect the current approved versions, and submit documentation to ESRB confirming completion of this review and update.

Finding 25: Missing NFPA hazard diamond at the [redacted]

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 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:

1) 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 observed that an NFPA hazard diamond placard was not posted at the [redacted] of the PPEF. NFPA hazard diamond placards provide critical hazard information to first responders regarding health, flammability, reactivity, and special hazards present at the facility. The absence of this signage represents a potential safety and emergency response concern, as emergency personnel may not have immediate access to necessary hazard information when responding to an incident.

PPEF must review the Safety Data Sheets for chemicals present at the facility, determine the applicable hazard ratings, and install a clearly visible NFPA hazard diamond placard at the [redacted] that reflects the maximum hazard ratings contributed by the chemicals in each category. PPEF must submit documentation to ESRB demonstrating installation of the NFPA placard.

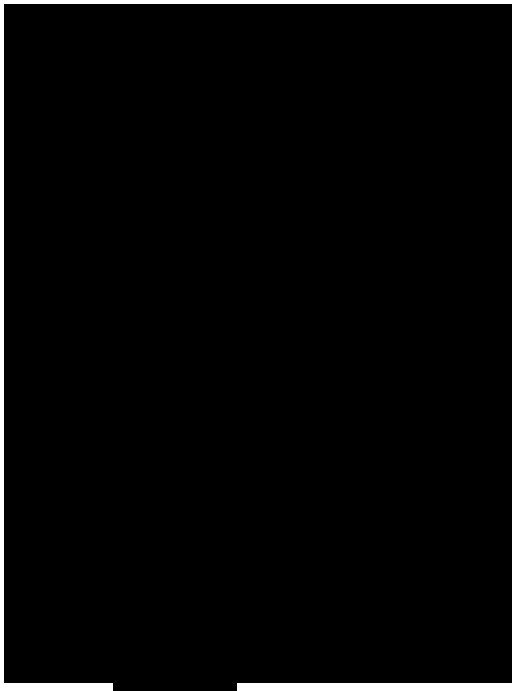

Figure 12: PPEF's [redacted] missing an NFPA 704 placard.

Finding 26: Expired inventory in multiple first aid kits.

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 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 13: Routine Inspection 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. All personnel are trained in the routine inspection procedures relevant to their responsibilities. Among other things, each GAO or ESSO creates, maintains, and implements routine inspections by:

b) Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels."

California Division of Occupational Safety and Health (Cal/OSHA) Title 8 CCR § 3400(c) states:

"A frequent inspection shall be made of all first-aid materials, which shall be replenished as necessary..."

During the field inspection, ESRB inspectors observed that multiple first aid kits at PPEF contained expired first aid inventory. First aid kits are intended to provide immediate treatment for minor injuries or to stabilize individuals until professional medical assistance is available. Expired medical supplies may have reduced effectiveness and may not perform as intended during an emergency. Maintaining current and serviceable first aid supplies is an important component of emergency preparedness and workplace health and safety. PPEF must submit documentation to ESRB confirming that all first aid kits at the facility have been reviewed, updated as necessary, and are maintained with unexpired supplies.

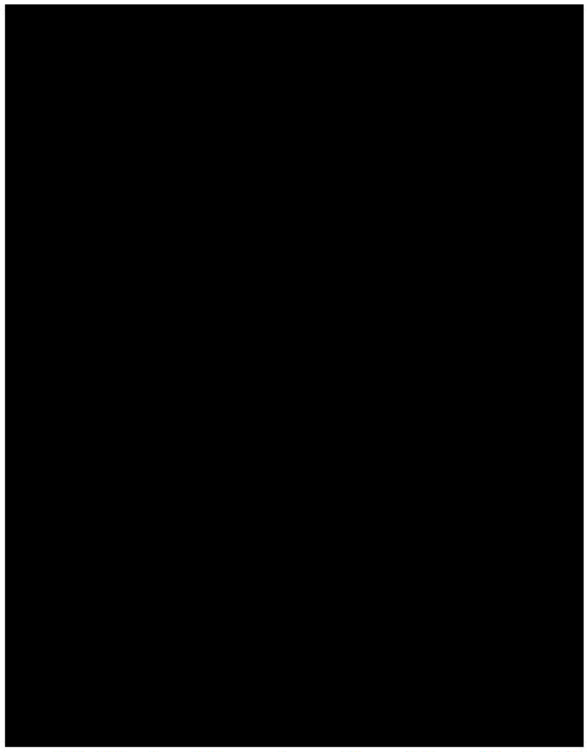

Figure 13: Expired inventory found in a first aid kit.

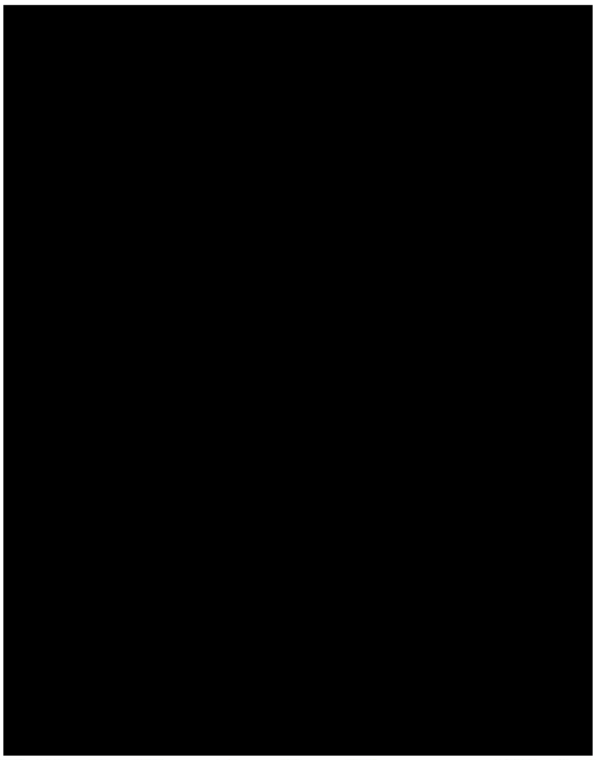

Figure 14: Expired inventory found in a second first aid kit.

II. CPUC-REQUESTED DOCUMENTS

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors (Onsite)**
	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)
	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	All Root Cause Analyses (last 5 years)
	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
	15	Arc flash Analysis
	16	Confined Space Entry Procedure
	17	Plant Physical Security and Cyber Security Procedures
	18	5-year Water Based Fire Protection System Inspection Record***
Training	19	Safety Training Records*
	20	Skill-related Training Records*
	21	Certifications for Welders, Forklift & Crane Operators*
	22	Hazmat Training and Records*
Contractor	23	Latest list of Qualified Contractors*
	24	Contractor Selection / Qualification Procedure
	25	Contractor Certification Records
	26	Contractor Monitoring Program
Regulatory	27	Daily CEMS Calibration Records (Onsite)**
	28	Air Permit
	29	Water Permit
	30	Spill Prevention Control Plan (SPCC)
	31	CalARP Risk Management Plan (RMP)
O&M	32	Daily Round Sheets / Checklists (Onsite)**
	33	Feedwater Grab-sample Test Records (Onsite)**
	34	Water Chemistry Manual

	35	Logbook (Onsite)**
	36	List of Open/Backlogged Work Orders*
	37	List of Closed/Retired Work Orders*
	38	Work Order Management Procedure
	39	Computerized Maintenance Management System (Demonstration Onsite)**
Gas Turbine	40	Maintenance & Inspection Procedures for CTG, STG, Generator, HRSG, Condenser & Transformer
	41	Borescope Inspection Reports (last 2 years)
	42	Hot Gas Path Inspection Reports
	43	Combustors Inspection Reports
	44	Intercooler Inspection Reports (if applicable)
	45	Overspeed Trip Test Records
	46	Bearing Lube Oil Analysis Reports
	47	DC Lube Oil Pump Test Records
Main Plant Air Compressors	48	Inspection Procedures and Records
Document	49	P&IDs*
	50	Vendor Manuals (Onsite)**
Spare Parts	51	Spare Parts Inventory List
	52	Shelf-life Assessment Procedures and Reports
Management	53	Employee Performance Review Procedures and Verifications
	54	Organizational Chart
HRSG	55	Tube Analysis Report
	56	Tube Clean Records (Internal and/or external)
	57	Safety Valve Test Records
	58	Hot Spots / IR Inspection Reports
	59	Structural Integrity Assessment
HEP	60	FAC Inspection Procedure & Measurements
	61	Pipe Hangers / Support Calibration Records
Steam Turbine	62	NDE Reports
	63	Borescope Inspection Records
	64	Most recent major STG inspection report
	65	STG inspection reports
	66	Overspeed Trip Test Records
	67	Bearing Lube Oil Analysis Reports
	68	DC Lube Oil Pump Test Records
	69	Emergency Stop Valve Test Records on Main Steam Line
	70	Steam Turbine Water Induction Prevention Procedures
Generator	71	Bearing Lube Oil Analysis

(Combustion and Steam Turbine Generators)	72	Maintenance & Inspection Procedures (or related documents)
	73	Electrical Test Records (Reactive power verification, excitation control modeling, polarization, etc.)
Transformers (All)	74	Hot Spots / IR Inspection Reports
	75	Oil Analysis Reports
Cathodic Protection	76	Procedures and Inspection Records
Air Cooled Condenser System	77	Cooling Fans & Motors Inspection Records
	78	Cooling Tower Structural Integrity Assessment
	79	Circulating Water Pumps Maintenance Records
Instrumentation	80	Instrument Calibration Procedures and Records
Test Equipment	81	Calibration Procedures and Records
Emission Control Equipment (SCR, Ammonia, NOx, CO)	82	Maintenance & Inspection Procedures and Records
Internal Audit	83	Internal Audit Procedures and all Records

Note: If a requested document is not applicable or available, please indicate as such

* 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.

*** Fire Protection Systems

a. Inspection, Testing, and Maintenance (ITM) records for plant's water-based fire protection systems (e.g., deluge, wet pipe, pre-action sprinkler systems, private hydrants) as per NFPA 25 as amendedby the State of California:
   - Annual Reports from last 3 years
   - Quarterly Reports from last 2 quarters
   - 5 Year Report from most recent ITM

b. ITM records for plant's engineered and pre-engineered fixed extinguishing systems (e.g., CO2,Clean Agent, etc.)
   - Semi-Annual Reports from last 3 years

c. ITM records for plant's fire alarm system as per NFPA 72 as amended by the State of California:
   - Annual Reports from last 3 years

d. Annual flow testing records for plant's fire pumps (electric and/or diesel) as per NFPA 25 asamended by the State of California: Annual Reports from last 3 years.