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VIA ELECTRONIC MAIL

Banu Acimis, PE
California Public Utilities Commission
Safety and Enforcement Division
Electric Safety and Reliability Branch
505 Van Ness Avenue
San Franciso, CA 90013
Banu.Acimis@cpuc.ca.gov
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RE: Generation Audit of Moss Landing Power Plant, Audit Number: GA2025-06ML

Dear Ms. Acimis:

Enclosed please find the Corrective Action Plan and response ("Response") of Moss Landing Power Company LLC ("Moss Landing Power Company") to the CPUC Audit Findings of the Safety and Enforcement Division of the California Public Utilities Commission ("CPUC") dated June 19, 2025, regarding a generation audit of Moss Landing Power Plant that took place March 3 through March 7, 2025 ("Findings"). Moss Landing Power Company is an indirect wholly owned subsidiary of Vistra Corp. (with Moss Landing Power Company "Company").

The information provided in response to each of the findings is based on the information certain of the Company's employees have collected and reviewed as of the date of the Response. The Company reserves the right to supplement or amend the Response and may provide additional information if it deems such additional response appropriate.

Confidential Treatment Request: The Company requests that the portions of the Response that contain infrastructure, internal operations, and potentially competitively sensitive information marked "**CONTAINS CONFIDENTIAL AND COMMERCIALLY SENSITIVE INFORMATION**" be treated as confidential and non-public. The disclosure of the portions of the Response containing the marks "**CONTAINS CONFIDENTIAL AND COMMERCIALLY SENSITIVE INFORMATION**" may not only violate proprietary

rights of the Company but also may grant competitors an unfair competitive advantage by disclosing our vendors or causing substantial harm to the competitive position of the Company.

Reservation of Rights: The information and responses contained herein are provided expressly subject to, and without waiver of, any objections that the Company may have to the Findings, including procedural or substantive objections and the content, scope, timing, burdensomeness, interpretation, or application of any part of the Findings, including each question, the instructions, or definitions. The production of information by the Company is not intended to waive, and should not be considered as a waiver of, any privilege or protection that could be asserted by it. The Company also reserves the right to supplement or amend any portion of the Response.

If you have any questions about this Response or related matters, please contact Jessica Miller jessica.miller@vistracorp.com and Heather Moreno heather.moreno@vistracorp.com.

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Finding 1	ESRB inspectors identified several locations at ground level and along walkways exposing Contractors and Plant Staff to burn hazards in excess of 140F. To address, the Plant must conduct a safety inspection to identify high temperature hazards and implement a means to block access to extreme heat in accessible locations, through physical barriers or insulation. **Status:** Complete **Response:** Plant personnel conducted a hazard identification inspection of exposed hot surfaces in walkways and at ground level. Physical barriers or insulation were installed to block access to extreme heat in accessible locations and hot surface signs were hung in the areas identified during the inspection. **Evidence:** See attachments in Folder 1 - High Temps within Reach
Finding 2	The Plant must establish a corrosion control and mitigation The Plant must establish a corrosion control and mitigation plan to prevent further progression of corrosion. Additionally, the Plant must conduct a structural integrity assessment for corrosion affecting walkways, including but not limited to the area around the condensers. **Status:** In progress **Response:** Moss Landing is working towards coating all the items found during the inspection. The Plant has an ongoing corrosion control and mitigation program. Each year areas are identified and prioritized through a site survey and existing work orders. The Plant had a Structural Engineer perform a structural integrity assessment of the walkways affected by corrosion on July 14, 2025. We are presently awaiting the engineer's report to proceed with scheduling any repair work that is recommended in the report. **Evidence:** See Folder 2 – Corrosion
Finding 3	Insulation around the Plant is severely damaged. The Plant must identify areas of concern and address the issues. Additionally, due to the Plant’s oceanic environment, the Plant must establish a corrosion mitigation program. **Status:** In progress **Response:** Annually before each spring outage, personnel will perform a site assessment and when necessary,

	develop a work scope to make the necessary repairs. An annual PM has been created in Maximo that will launch the inspections and track the repairs. [redacted] **Evidence:** See Folder 3 – Insulation
Finding 4	The Plant must correct improper equipment repairs and interim repair solutions. The Plant must determine if there is a need for repair and implement a permanent solution with engineering or management review and approval. If temporary repairs are required, they must be documented and a part of a plan, resulting in a permanent solution. **Status:** In progress **Response:** All issues identified in Finding 4 have been resolved [redacted] **Evidence:** See Folder 4 – Improper Repairs
Finding 5	The Plant must address various equipment leaks. The Plant must address and correct the leaks. **Status:** Complete **Response:** All the leaks identified have been repaired. Employees have been instructed to include leaks that are identified during walk-downs and during routine operations and report them to the shift supervisor and submit a work order for repair. **Evidence:** See Folder 5 – Leaks
Finding 6	The Plant must ensure proper cleanup is conducted following completed maintenance activities. The Plant must establish a standard that cleaning after a maintenance activity is a part of the task. **Status:** In progress **Response:** All areas identified in Finding 6 have been cleaned up. Clean up lists are added to every job plan and will be followed up upon after all maintenance activities have been completed. [redacted] **Evidence:** See Folder 6 – Cleanup

Finding 7	The Plant must improve tracking and implementation of corrective actions identified. The Plant must track the deficiencies identified through completion. Additionally, the Plant must implement a practice of identifying, tracking, and correcting the issues the Plant identified and utilizing the notes section. Notes sections can be used to communicate if the issue was corrected during the inspection or identify the associated work order used to correct the issues. **Status:** In progress **Response:** Moss Landing will update the monthly vehicle and SPCC inspection log to include a comment area to record the corrective actions taken when issues have been identified during the inspection. This is not limited to on-site repairs, this also includes the submission of work orders when an issue has been identified. [redacted]
Finding 8	The Plant must improve documentation and tracking of maintenance completed during outages. For sufficient tracking and documentation of equipment history, the Plant must document and maintain records of maintenance and corrective actions to ensure the proper maintenance is conducted and planned for, improving reliability. **Status:** In progress **Response:** Moss Landing will conduct training for all employees on the importance of attaching all outage equipment corrective action reports and documentation to the work order or logging where these reports are stored in the work order. Employees will also be reminded to issue work orders for work discovered and not corrected during the outage to ensure work can be addressed at the next available opportunity. [redacted] **Evidence:** See Folder 8 – Maintenance Tracking
Finding 9	Finding 9: The Plant must address various safety hazards across the site The Plant must address the issues identified and remove the hazards they create for Plant Staff and contractors working on site and improve safety. If a hazard cannot be removed or resolved, the Plant must identify the hazard using signage, paint, or other means to identify and prevent access to the hazard. Additionally, the Plant must conduct routine walkdowns to identify and promptly correct safety issues. **Status:** In progress **Response:** Moss Landing has removed or resolved all the hazards identified with the exception of the swing gates. The swing gates have been ordered and will be installed when they are received [redacted]. **Evidence:**

	See Folder 9 – Safety Hazards
Finding 10	Ladders are staged, left in place, and not properly stored. The Plant must evaluate the needs of technicians by conducting a Human Factor Evaluation, assessing the need for permanent elevated platforms, stairs, ladders, or access points. **Status:** In progress **Response:** Moss Landing will conduct training with all the staff on proper ladder store practices and locations where ladders are to be stored. Ladder inspections are done before each use and annually to ensure all ladders are in good working condition. [redacted] **Evidence:** See Folder 10 – Ladders Storage
Finding 11	Generator Step Up (GSU) Transformers are surrounded by material preventing emergency access. The Plant must remove the materials from the perimeter of the GSU and move the material to the designated laydown or staging areas at the Plant. **Status:** In progress **Response:** Moss Landing will relocate piping and other materials away from the access gate to the switchyard and relocate any combustible material within 100 feet of the GSUs. [redacted]
Finding 12	The Plant exhibits poor housekeeping, not properly storing tools and equipment. The Plant must establish a practice of returning tools to storage locations and properly storing spare parts. **Status:** In progress **Response:** Moss Landing will conduct refresher training with Plant staff regarding good housekeeping practice as well as perform periodic site walkdowns to evaluate housekeeping practices and identify areas where additional housekeeping is needed. [redacted] **Evidence:** See Folder 12 – Housekeeping
Finding 13	The Plant's electrical system is in poor condition To ensure compliance with safety regulations and maintain the integrity of electrical systems, open junction boxes must be properly covered to prevent accidental contact with wires. If the junction boxes are disconnected, the systems must be removed or properly taken out of service. Cable trays are not being maintained according to the original equipment manufacturer (OEM) specifications or OEM installation.

	The Plant must correct the identified issues and maintain a practice of proactively identifying and correcting electrical system issues at the Plant. **Status:** Complete **Response:** The items identified in the CPUC findings have all been corrected and the junction boxes will be inspected during routine operator rounds and if issues are identified, a work order will be submitted to initiate corrective actions. **Evidence:** See Folder 13 – Electrical Equipment
Finding 14	Arc Flash Hazard identification labels must be applied to appropriate equipment panels. Arc Flash labels are a critical component of electrical safety in power plants, as they provide vital information about the potential risks associated with electrical equipment and the required Personal Protection Equipment (PPE). **Status:** In progress **Response:** An updated Arc Flash study was initiated in December 2024. The updated study includes the equipment identified in the findings. Upon receipt of the completed report, the plant stickers will be updated and/or added to the new equipment. [redacted]
Finding 15	The Plant must routinely inspect High Energy Piping (HEP) supports. The Plant must improve the HEP monitoring process, provide visual aids, and make routine visual inspections of the HEP system part of its daily round inspections. As a part of the Plant's corrective action plan submitted to ESRB, the Plant must develop a routine inspection plan with a stated frequency and submit this plan to ESRB. **Status:** In progress **Response:** Moss Landing has a contract with [redacted] to perform an annual pipe support inspection. The engineer will conduct a survey and identify the visual indications that need corrected [redacted]. Plant will train employees how to visually inspect piping supports for proper functionality. Plant will update operator rounds to include a place to note whether any problems with pipe supports were found and document the corresponding work order. Consistent with the training in Finding 8, the operators will be trained in the documentation of equipment history, maintaining records of maintenance and corrective actions to ensure proper maintenance is conducted and planned.
Finding 16	Spill Prevention Countermeasure and Containment response kits are in poor condition. The Plant must conduct a one-time inspection of all Spill Response Kits to ensure they are in adequate condition. Following this one-time inspection, routine inspections must be conducted to monitor the condition of all Spill response kits

	Status: Complete **Response:** Inventory has been performed on all spill kits; replacement material has been ordered and replaced in the spill kits. Spill kits will be checked weekly as part of the Operator rounds and work orders created when replacement materials are needed. **Evidence:** See Folder 16 – Spill Prevention
Finding 17	The Plant must remove obsolete equipment and update Piping and Instrumentation Diagrams. The Plant should remove these obsolete systems, if deemed reasonable, to facilitate easier access for future maintenance personnel and improve overall site management. When changes have been made to the system or equipment that affects the piping and instrumentation drawings (P&IDs), the Plant must update the drawings to the As-Built configuration. For example, changes to the Circulation Water System; P&ID 41400-1PO-4-CW 0-05 needs to be appropriately marked and updated on the original or parent drawings. **Status:** Complete **Response:** A Management of Change (MOC) procedure has been established to identify, evaluate, implement, and document permanent equipment and system design changes. The findings below identify equipment that was being repaired at the time of the audit and has since been repaired and/or replaced. • Figure 84 is an operational piece of equipment that was removed for overhaul. It was reinstalled in June of 2025. • Figure 85a was equipment removed to repair a firewater line leak. This equipment has been reinstalled. • Figure 85b & 85d are generator doors that are in the process of being repaired and/or replaced. • Figure 85c is a pump that was pulled and needs to be replaced. **Evidence:** Folder 17 - Remove Obsolete Equipment & Update P&IDs
Finding 18	The Plant's Emergency response and preparedness information is outdated in the Emergency Response Plan and the Site-Specific Orientation video. The Plant must update the site-specific training to include the Plant's evacuation routes, muster points, the use and location of windsocks, and up to date Plant contact information. As a part of the corrective action plan, the Plant must establish a practice of completing and documenting annual reviews of Health and Safety related documentation, including Emergency Response Plans. If a review is completed, and no revision is required, the review must be documented stating there were no revisions made, but the review was completed. If significant changes are made, more frequent updates may be required if the changes affect workplace procedures, or employee responsibilities. This review must be documented through a Memorandum of Change (MOC) or similar process. After revisions are made, the Plant must communicate the revised document to all employees at the site.

	The Plant must add The California Public Utilities Commission to the list of government agencies contact list for safety incident reporting based on the requirements in GO 167-C Section 9.4. **Status:** In progress **Response:** The maps have been updated for the training to indicate the muster points, and a copy has been provided. [redacted] A PM has been created in Maximo to perform an annual review of the emergency response procedure. A work order will be automatically created annually for this review. This procedure will contain a revision table indicating the procedure was reviewed and documents any updates that were made. **Evidence:** See Folder 18 – Emergency Response
Finding 19	An unmarked barrel is accumulating and unknown liquid. A barrel is unmarked and is accumulating an unknown liquid. Barrels allowed to accumulate a fluid must be marked with its contents to ensure hazards can be properly identified and to avoid mixing of reactive substances. The Plant must identify the fluid, and mark it as required. Additionally, the secondary containment drain must be cleaned. **Status:** Complete **Response:** Moss Landing has reviewed the contents of the drums and labels have been added to the drums. **Evidence:** See Folder 19 – Unmarked Barrel
Finding 20	Extended or outdated Lock Out Tag Out (LOTO) Tags are evident. The Plant must routinely inspect clearances and verify that the LOTO is still active and that the Plant's established LOTO procedure for transferring LOTOs during Plant Personnel shift changes are completed for each shift change. The Plant must evaluate the active LOTO's and complete the necessary maintenance to remove the active clearances. **Status:** Complete **Response:** Figure 87 was a valid LOTO tag for a pump that was removed for overhaul. This pump was returned to service during the May 2025 Spring outage and the LOTO has been removed. Figure 88 was also a valid LOTO tag for a filter which was removed for overhaul. The filter was replaced during the May 2025 Spring outage and LOTO was removed. Figure 89 LOTO tag was for equipment that is not functional and no longer used. This equipment has been disconnected at the breaker and the LOTO tag has been removed. All LOTOs have been reviewed and all clearances removed where applicable. **Evidence:** See Folder 20 – LOTO
Finding 21	Signage depicting hazards are in poor condition and must be replaced around the Plant.

	The Plant must continuously monitor the condition of all signage and identify and replace signs as needed. **Status:** Complete **Response:** Moss Landing has replaced the labels identified during the findings. Employees have been instructed to include damaged, faded, or missing signage in the rounds and report to the shift supervisor and submit a work order for replacement. **Evidence:** See Folder 21 – Signage
Finding 22	NFPA 704 Placards are in poor condition. The Plant must replace NFPA hazard identification placards where they are faded or missing as shown in Figure 94 and Figure 95. The Plant must continually monitor the condition of all its signage and replace it as needed. **Status:** Complete **Response:** Moss Landing has replaced the placards identified in the findings. Signs and labels that are faded will be reported in the round sheets to the shift supervisor and a work order will be submitted for replacement. **Evidence:** See Folder 22 – NFPA 704 Placards
Finding 23	Flammable Storage Cabinets must have self-closing and latching doors. These cabinets must be replaced or repaired. The figures below are staged to show the faulty self-closing and latching mechanisms in each. Flammable storage cabinets in this condition were seen along pipe alley, in the material storage area, and atop the steam turbine deck. **Status:** Complete **Response:** Moss Landing has repaired the cabinet in Figure 99 and has replaced the flammable storage cabinets in Figures 97 and 98 identified in the audit. **Evidence:** See Folder 23 – Flammable Storage Cabinets
Finding 24	The fire suppression system for the steam turbine lube oil bearings must be identified with proper markings. The Plant must paint or identify the fire suppression system for STG Unit 1 and other units. **Status:** In progress **Response:**

	Moss Landing has contracted to have the deluge fire suppression piping painted red for both Unit 1 and Unit 2 STG. [redacted]
Finding 25	Missing and Faded Equipment and Pipe Identification Labels. The failure to replace damaged or missing warning and equipment labels compromises the visibility and effectiveness of these safety indicators. The Plant must replace equipment and pipe identification labels and routinely monitor the condition and proactively replace the labels **Status:** Complete **Response:** Moss Landing has replaced the labels identified in the findings. Employees have been instructed to include damaged, faded, or missing signage in the rounds and report to the shift supervisor to submit a work order for replacement. **Evidence:** See Folder 25 – Pipe IDs
Finding 26	Portable Fire extinguishers at the Plant were missing routine fire extinguisher inspections and maintenance. The Plant must ensure completion of routine monthly inspection of all fire extinguishers and maintain proper recordkeeping to ensure the safety of personnel and equipment. **Status:** Complete **Response:** Moss Landing has replaced the fire extinguisher in the battery room and the inspection of the extinguishers has been added to the monthly contractor rounds. The remaining two fire extinguishers have been inspected and are now back in service. All fire extinguishers are inspected monthly by [redacted] and extinguishers identified during the inspection are replaced or taken out of service until a replacement has been secured. **Evidence:** See Folder 26 – Portable Fire Extinguishers
Finding 27	Equipment alarms must be addressed and corrected. ESRB inspectors noted two instances where the Plant has active alarms that have not been addressed or corrected. The Plant must promptly acknowledge active alarms and resolve issues to maintain plant safety and reliability. **Status:** In progress **Response:** Moss Landing has corrected the alarms on the H2 dryer and is in the process of correcting the alarm on the fire alarm panel. [redacted] **Evidence:** See Folder 27 – Equipment Alarms

Finding 28	Lighting in the warehouse was not operational. The Plant must repair the lighting in the parts storage warehouse. **Status:** Complete **Response:** The power source for the building was destroyed due to the ML300 fire. This power has been rerouted and the lighting in the warehouse has been restored. **Evidence:** See Folder 28 – Lighting in the Warehouse