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

August 29, 2025

Rick Spurlock
Director Asset Management
641 Camino de la Fuente
San Diego, CA 92154

SUBJECT: **Energy Storage System Audit of Gateway Energy Storage Audit Number ESS2025-01GW**

Dear Mr. Spurlock:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emmanuel Salas, Evan Coughran, and Joseph Ling of ESRB staff conducted an Energy Storage System audit of Gateway Energy Storage from June 2 through June 5, 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 29, 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 achieve full compliance with GO 167-C.

Please submit your response to Emmanuel Salas at emmanuel.salas@cpuc.ca.gov. Please note that although Gateway Energy Storage 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 Gateway Energy Storage 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 September 29, 2025.

Please note that ESRB will also post the Gateway Energy Storage 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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SAN FRANCISCO, CA 94102-3298

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,

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

Attachment: CPUC Energy Storage System Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Stephen Hur, Senior Utilities Engineer - Supervisor, ESRB, SED, CPUC
Emmanuel Salas, Utilities Engineer, ESRB, SED, CPUC
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC

CPUC Audit Findings of
Gateway Energy Storage
June 2 – 5, 2025

I. Findings Requiring Corrective Actions.

Finding 1: Gateway Energy Storage (Gateway) has not conducted an Arc Flash analysis for Gateway 1 and substation equipment since 2020.

General Order (GO) 167-C, Appendix C, Maintenance Standard (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."*

National Fire Protection Association (NFPA) 70E: 130.5 Arc Flash Risk Assessment states in part:

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

During the audit, Electric Safety and Reliability Branch (ESRB) inspectors reviewed Gateway's arc flash documentation and found that the most recent arc flash analysis for equipment at Gateway 1 and the substation was completed in 2020. Gateway did not provide an updated study for this portion of the site, and several arc flash labels on equipment still reflected the 2020 analysis date. Gateway must perform an updated arc flash analysis for all applicable equipment at Gateway 1 and the substation to maintain compliance with NFPA 70E and ensure personnel are protected from arc flash hazards. Additionally, Gateway must implement a process to ensure arc flash and incident energy analyses are reviewed and updated at least once every five years. Gateway must submit the updated arc flash documentation to ESRB for review and verification.

Figure 1: Arc flash sticker with a 2020 analysis date.

Finding 2: Gateway must ensure that all agreed-upon updates from the evacuation drill critique are incorporated into the Emergency Response Plan (ERP).

GO 167-C, Appendix D, Operating Standard (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."*

During the audit, ESRB inspectors reviewed the facility's live document titled "*Sept. 24 ERP Critique and Questions*" which outlines observations and recommended improvements intended for incorporation into the ERP. Gateway indicated in this document that specific updates would be made to the ERP based on the fire incident and evacuation drill findings; however, the ERP provided during the audit did not include at least one of the updates the facility had committed to implementing. Gateway must ensure that all agreed-upon changes identified through evacuation drill critiques are incorporated into the ERP. Gateway must submit an updated ERP and provide documentation confirming that all corrective actions from the critique document have been addressed.

Finding 3: Lack of documented plan to address insurance recommendation for roof vent fusible link replacement.

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

> *"The protection of life and limb for the work force is paramount. The company*

behavior ensures that individuals at all levels of the organization consider safety as the overriding priority."

GO 167-C, Appendix C, MS 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."

During the audit, ESRB inspectors reviewed [redacted] Insurance Services' 2022 property inspection report for Gateway, which included Recommendation [redacted]. This recommendation advised replacing the fused links in the rooftop mounted roof vents for buildings 1, 2, 4, and 5 with links rated at a minimum of [redacted] and avoiding use of quick response style link devices. When asked how this recommendation would be addressed, Gateway provided [redacted] proposal dated the June 20, 2025. The proposal restates the insurance comment and notes that a future letter will provide recommendation and requirements related to the temperature rating of the smoke and heat vent. However, it does not indicate what the recommendation is, nor whether Gateway intends to implement the change, propose an alternative, or otherwise resolve the recommendation. Gateway must provide documentation that analyzes the recommendation, states how it will be addressed, cites applicable codes or standards, and provides a schedule for corrective action if replacement will be performed.

Finding 4: Gateway must align the fire response procedures across its emergency response documents to ensure consistency.

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."

During the audit, ESRB inspectors reviewed the facility's emergency response documentation and noted inconsistencies between the "*Emergency Response Plan - Fire and Injury Accident*" and the "*Operational Emergency Response*" procedures. Both documents contain fire response instructions, but the guidance provided is not fully aligned. For example, the "*Operational Emergency Response"* procedure directs notifying the Remote Operating Center (ROC) personnel as a specific early action, while the "*Emergency Response Plan - Fire and Injury Accident"* does not include ROC notification in its initial steps. Conflicting or redundant emergency procedures can lead to confusion during critical response efforts and delay coordination with emergency personnel. Gateway must review and revise these documents to ensure that fire response protocols are consistent, accurate, and fully aligned. Gateway must submit the updated versions of both documents to ESRB for review and verification.

Finding 5: Work orders for completed tasks have not been closed out.

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 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."

ESRB inspectors observed that Gateway has not been consistently closing out completed work orders which resulted in outdated entries remaining open in the work order tracking system. It is essential that maintenance and operational work orders be closed promptly upon completion to ensure accurate recordkeeping and effective planning, and to support timely execution of preventive and corrective maintenance activities. During the audit, inspectors noted multiple instances where tasks had been completed in the field but remained marked as open in the system. Gateway must develop a plan to review all open work orders, ensure completed tasks are properly closed out, and submit the plan to ESRB for review and verification.

Finding 6: Leaking backflow preventer valve at facility entrance requires repair.

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."

ESRB inspectors observed that the backflow preventer valve located at the front of the Gateway facility was actively leaking. During the audit, visible signs of leakage were noted around the valve. Gateway personnel acknowledged that the issue was known and stated they had previously coordinated with the local fire department regarding the cause, as this has been a recurring problem. Gateway must repair or replace the leaking backflow preventer valve and verify that it is functioning properly. Gateway must also provide photographic evidence or other documentation to ESRB confirming that the valve has been repaired and is no longer leaking

Figure 2: Leaking backflow preventer valve.

Finding 7: Gateway must investigate and resolve the active [redacted] motor alarm on the [redacted] overcurrent protection relay panel.

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."*

During the audit, ESRB inspectors observed an active [redacted] motor alarm displayed on the [redacted] overcurrent protection relay panel located in the substation control house. Gateway staff did not indicate that the alarm had been evaluated or documented. Alarms on protection relays must be promptly investigated and resolved to ensure proper operation of associated circuit breakers and protection systems. Gateway must investigate the [redacted] motor alarm, document the cause and any corrective actions taken, and submit the corresponding work order or engineering evaluation to ESRB for review and verification.

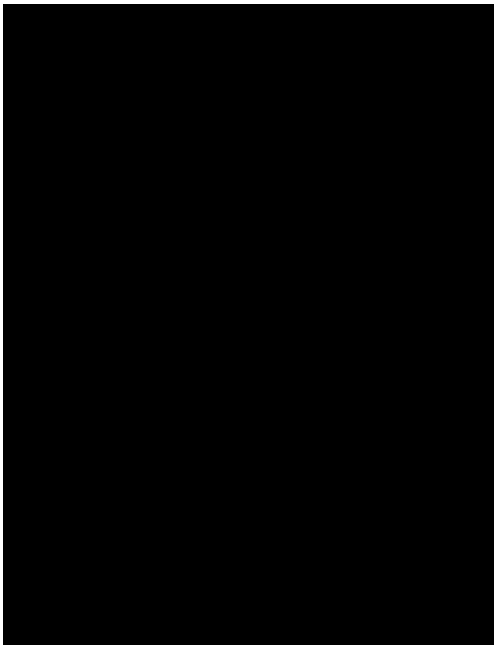

Figure 3: Active [redacted] motor alarm.

Finding 8: Gateway did not generate a work order for a fan failure alarm, delaying proper tracking of the issue.

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 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."*

During the audit, ESRB staff reviewed alarm and work order records and found that a fan failure alarm for equipment ID: [redacted] occurred on April 26, 2025, and was acknowledged on April 28, 2025. However, Gateway did not generate a work order to document the alarm, investigate the issue, or track corrective action. All alarms requiring corrective action in the field must be logged in the facility's work order management system to ensure appropriate follow-up and equipment reliability. Gateway must ensure that alarms are promptly acknowledged and, when applicable, followed by corresponding work order entry. Gateway must provide the missing work order or submit documentation explaining the resolution of the alarm for ESRB review.

Finding 9: Broken and outdated hot sticks were observed in the control house and must be removed or replaced.

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."*

California Division of Occupational Safety and Health (Cal OSHA) Title 8 California Code of Regulations (CCR) § 2940.6(e)(3) states in part:

> *"Biennial Inspection. Live-line tools used for primary employee protection shall be removed from service every 2 years, and whenever required under subsection (e)(2) of this section, for examination, cleaning, repair, and testing…"*

During the audit, ESRB inspectors observed broken and outdated hot sticks stored in the control house at Gateway Energy Storage. Hot sticks are critical safety tools for performing work on energized electrical equipment and must be maintained in proper condition to provide effective protection. Tools with visible damage or expired certifications may not meet the necessary insulating or mechanical standards and must not be relied upon in the field.

Gateway Energy Storage must remove and properly dispose of all damaged or expired hot sticks and ensure that inspection and replacement procedures are in place to verify the condition and certification status of all live-line tools. Gateway must provide photographic evidence that the broken hot sticks have been removed and must provide the most current hot stick inventory list with inspection dates.

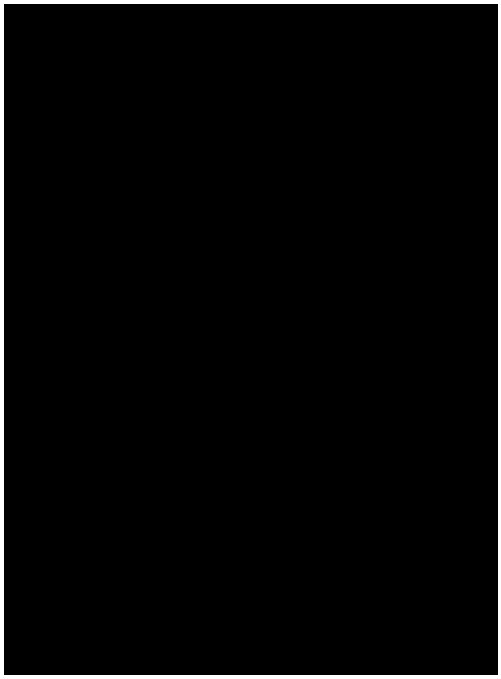

Figure 4: Broken Hot Sticks left in the substation control house.

Finding 10: ESRB inspectors observed a flammable material storage cabinet without a self-closing mechanism.

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."*

NFPA 1 60.1.2.23 (d) states:

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

ESRB inspectors observed that the flammable storage cabinet at Gateway is not equipped with a self-closing and self-latching door mechanism. Flammable storage cabinets must include these features to minimize fire propagation risk, as required by NFPA 1 Section 60.1.2.23(D). Gateway must replace or retrofit the flammable storage cabinet to ensure it is self-closing and self-latching in accordance with applicable safety requirements. Gateway must also submit photographic evidence to ESRB for review and verification.

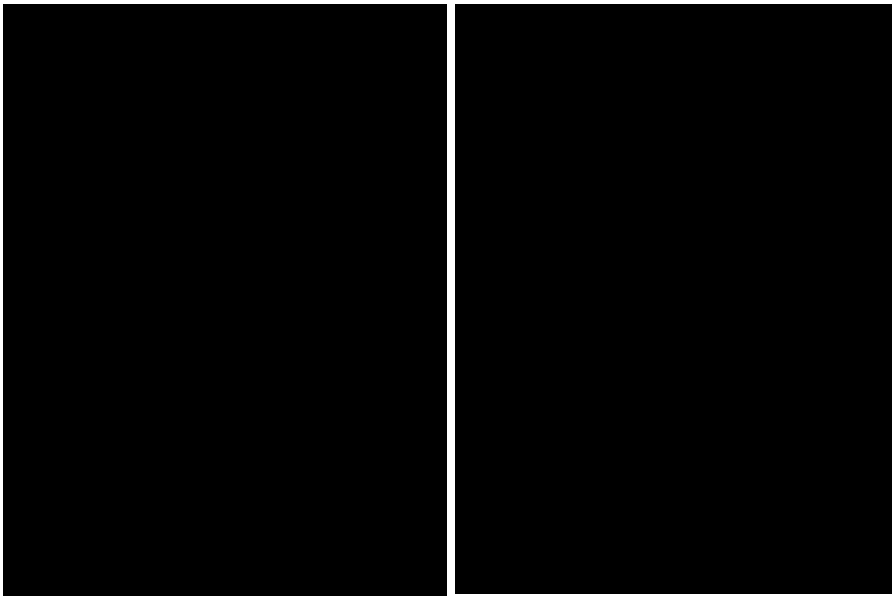

Figure 5: Flammable material storage cabinet without a self-closing mechanism.

Finding 11: The hazardous waste collection drum must be clearly labeled.

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."*

Cal OSHA Title 8, §5194(f)(1) states in part:

> *"The employer shall ensure that each container of hazardous substances…is labeled, tagged or marked with:*
>
> *(A) Product identifier*
>
> *(C)Hazard Statement(s)"*

During the audit, ESRB inspectors observed a hazardous waste collection drum in a storage area at Gateway that lacked the required labeling to identify its contents or associated hazards. Proper labeling is essential to ensure safe handling, prevent the accidental mixing of incompatible substances, and support effective emergency response. Unlabeled containers pose a direct risk to personnel safety and may result in non-compliance with hazardous waste regulations.

Gateway must ensure that all hazardous waste containers are clearly labeled with the chemical identity, appropriate hazard warnings, and accumulation start dates. Additionally, Gateway must implement a verification process to ensure labeling remains accurate and up-to-date at all times and provide it ESRB for review and verification.

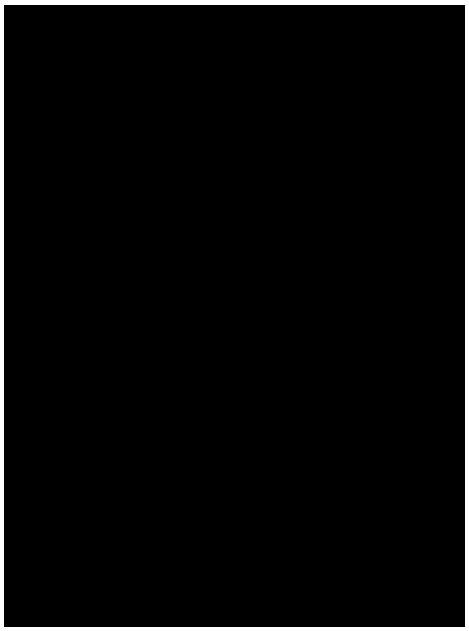

Figure 6: Unlabeled hazardous waste collection drum.

Finding 12: Gateway lacks records of required quarterly site safety inspections.

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

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

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

"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."

During the audit, ESRB inspectors requested documentation of quarterly site safety inspections for Gateway, as required by the facility's "*Injury and Illness Prevention Plan*", but Gateway did not provide it. Regular safety inspections are a foundational element of a compliant safety program, used to identify and correct hazards, verify safe operating conditions, and support continuous improvement. Documentation of these inspections is necessary to confirm that they are occurring at the required frequency, that findings are tracked, and that corrective actions are implemented.

Gateway must develop a plan to ensure that quarterly site safety inspections are conducted as required, and that documentation is consistently completed, retained, and made available for regulatory review. The plan must be submitted to ESRB for review.

Finding 13: The physical Lockout/Tagout (LOTO) procedure in the LOTO binder is outdated and must be updated.

GO 167-C, Appendix C, MS 8: Maintenance Procedures and Documentation states in part:

"Maintenance procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid."

Cal/OSHA Title 8, §3314(j) states in part:

"The employer shall conduct a periodic inspection of the energy control procedure(s) at least annually"

Cal/OSHA Title 8, §3314(g)(2) states:

"The employer's hazardous energy control procedures shall be documented in writing."

During the audit, ESRB inspectors observed that the physical copy of the LOTO procedure stored in the LOTO binder at Gateway was outdated by one revision. Although the current version was available electronically, the physical document serves as a primary reference during field activities and must be consistent with the most recent approved procedure.

Maintaining alignment between physical and electronic documentation is essential to ensure that personnel always have access to accurate safety procedures. Gateway must replace the outdated physical copy of the LOTO procedure with the current revision and confirm that document control processes are in place to ensure all field-accessible materials remain current. Gateway must also provide a photograph of the updated physical LOTO procedure to ESRB for review and verification.

Finding 14: Equipment inspection tags are missing or outdated.

GO 167-C, Appendix C, MS 8: Conduct of Maintenance states:

> *"Maintenance procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid."*

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

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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 eyewash stations and fire extinguishers that lacked current inspection tags or showed evidence of missed monthly inspections. During the audit, multiple tags were found to be outdated, unsigned, or missing entirely, with some equipment showing no record of inspection for several consecutive months. Gateway must ensure that all required inspections are conducted on schedule and that inspection tags are clearly marked with accurate dates and signatures. Gateway must also develop and implement a plan to ensure timely completion and documentation of all future inspections and submit the plan to ESRB for review and verification.

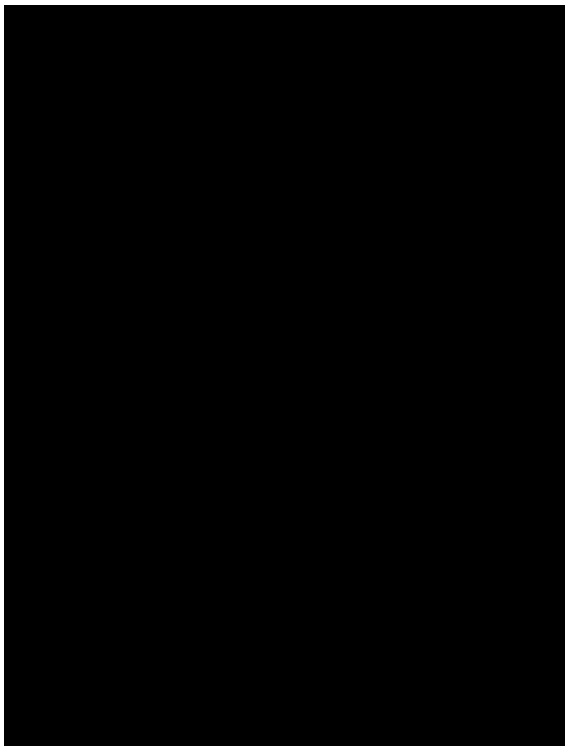

Figure 7: Eye wash station with several months of inspections missing.

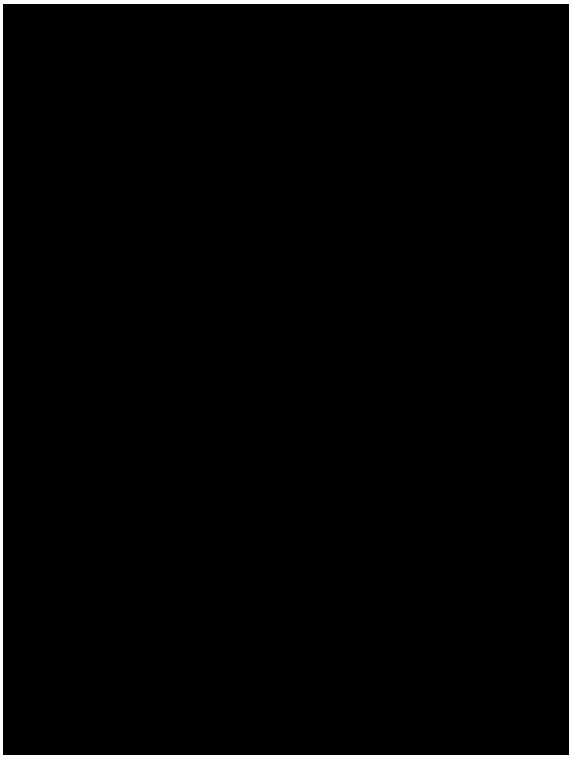

Figure 8: Eye wash station no inspection tag.

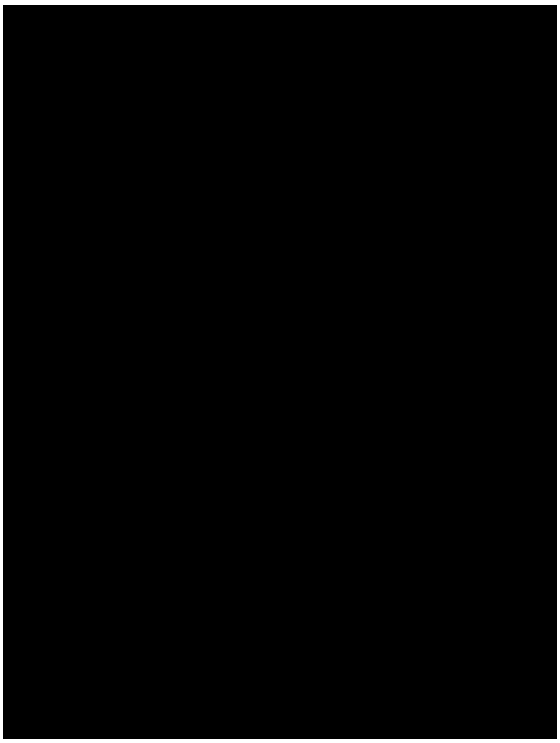

Figure 9: Fire extinguisher missing past monthly inspections.

Finding 15: The hazardous materials list in the hazardous materials physical folder must be updated to include Gateway 2.

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. 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."

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."

Cal/OSHA Title 8, §5194(I)(3) states:

"Employers shall develop, implement, and maintain at the workplace a written hazard communication program...which also includes...a list of the hazardous substances known to be present."

During the audit, ESRB inspectors observed that the hazardous materials inventory stored in the designated binder only listed 'Gateway 1.' This inventory was developed prior to the addition of

Gateway 2. Since Gateway 2 has been constructed and is operational, the site's hazardous materials must be updated to reflect this change.

The hazardous materials inventory must be reviewed and updated to determine whether any hazardous substances are present at Gateway 2, and if so, they must be included in the inventory to maintain compliance with regulatory standards. Gateway must implement a process for reviewing and updating its hazardous materials inventory and related documentation following significant changes in facility operations, materials, or equipment that could impact hazardous substance use or storage. Gateway must submit the updated inventory and a description of the review process to ESRB for review and verification.

Finding 16: Gateway must replace deteriorated signage.

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

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

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

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

ESRB inspectors observed faded safety signage throughout the Gateway facility. Clear and legible signage is essential to ensure worker safety and regulatory compliance. During the audit, inspectors noted that prolonged sun exposure and general wear had reduced the legibility of various labels. Gateway must conduct a site-wide review of all safety signage and labeling, replace any that are faded or illegible, and incorporate signage checks into routine inspection procedures to ensure labels remain in good condition. Gateway must also provide photographic evidence of the replaced signage and a description of the implemented inspection process to ESRB for review and verification.

Figure 10: Deteriorated signage.

II. CPUC REQUESTED DOCUMENTS

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors**
	2	Emergency Response and Emergency Action Plan
	3	Evacuation Map and Plant Layout
	4	Records Demonstrating Coordination with Local Agencies in the Development of the ERP and EAP.
	5	Evacuation Drill Report and Critique (last 3 years)
	6	Records of Emergency Trainings, Table-Top Exercises, and Drills Involving Local First Responders or Other External Agencies
	7	Hazmat Handling Procedures
	8	SDS for All Hazardous Chemicals
	9	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	10	OSHA Form 300 (Injury Log) and OSHA Form 301 (Incident Report) (last 4 years)
	11	List of all CPUC Reportable Incidents (last 5 years)***
	12	Fire Protection System Test Report and Inspection Record (5 years)
	13	Insurance Report / Loss Prevention / Risk Survey (last 5 years)
	14	Lockout / Tagout Procedure (last 3 revisions, if applicable)
	15	Arc flash Analysis
	16	Emergency Shutdown or Battery Discharge Protocol
	17	Plant Physical Security and Cyber Security Procedures and Records
	18	Job Safety Analysis Program**
Employee Training	19	Safety Training Records*
	20	Skill-related Training Records*
	21	Certifications for Electrical, Welders, Forklift & Crane Operators*
	22	Hazmat Training Records *
Contractors	23	Latest list of Qualified Contractors*
	24	Contractor Selection / Qualification Procedure
	25	Contractor Certification Records
	26	Contractor Monitoring Program
	27	BESS Maintenance Contract and Operations and Monitoring Contract
	28	BESS Building Construction Contractor Information
Regulatory	29	Air Permit

	30	Water Permit
	31	Spill Prevention Control Plan (SPCC)
	32	Construction Permitting Documents from permitting organizations
	33	Commissioning Documentation (Inspection reports)
	34	Community Outreach, County/Local Board Responsibilities
O&M	35	Daily Round Sheets / Checklists
	36	Logbook**
	37	List of Open/Backlogged Work Orders*
	38	List of Closed/Retired Work Orders (last 2 years)*
	39	Open/Backlogged Contractor Issues or Tickets
	40	Work Order Management Procedure (last 3 revisions, if applicable)
	41	Computerized Maintenance Management System (Demonstration onsite)**
	42	SCADA system (Demonstration onsite)**
	43	All Root Cause Analyses (if any)
	44	Emergency Generator Test and Maintenance Records (last 5 years)
	45	Substation Battery Test and Maintenance Records (last 5 years)
	46	Maintenance and Inspection Records for Switchgear/breaker/relays
	47	Building HVAC inspection and maintenance records
Battery Energy Storage System	48	Capacity Testing Records and Procedure
	49	Round Trip Efficiency Test Records and Procedure
	50	Thermal Management System Inspection Records
	51	Battery Management System (Rack and Module) Maintenance and Calibration Records
	52	Battery Protection Unit Inspection and Calibration Records
	53	Battery Health Assessment Report and Procedure
	54	Failure Modes and Effects Analysis (FMEA) or Hazard Analysis
	55	Underwriters Laboratory 9540A Test Reports
BESS Fire Suppression System	56	BESS Fire Suppression System Requirements
	57	BESS Fire Suppression System Inspection, Maintenance, and Testing Records
	58	BESS Fire Suppression System As Built Drawings and Schematics
	59	Operations and Monitoring Setup of the BESS Fire Suppression System (Onsite Demonstration)**
	60	BESS Fire Suppression System Integration with Fire Alarm Panel Design Records or Manuals
	61	BESS Fire Suppression System Standard Operating Procedure or Control Room User Manual
Transformers	62	Medium Voltage Transformer Maintenance and Inspection Records
	63	Maintenance and Inspection Records for Main Transformer(s)

	64	Hot Spots / IR Inspection Reports
	65	Dissolved Gas Analysis Reports
Instrumentation	66	Instrument Calibration Procedures and Records
	67	Fire, Heat, Gas, and Smoke Detection Calibration and Test Records
Test Equipment	68	Calibration Procedures and Records
Documentation	69	Records of all system outages greater than 50 MWs and longer than 72 hours
	70	Record of Thermal Runaway Events
	71	Module or Rack level Electrical Schematics
	72	As-Built Construction Drawings including Single Line Diagram
	73	OEM BESS Data/Specification Sheet
	74	Vendor Manuals (BESS, BMS, Inverter)
Spare Parts	75	Spare Parts Inventory List
	76	Shelf-life Assessment Report
Management	77	Employee Performance Review Procedures and Verifications
	78	Organizational Chart
Internal Audit	79	Internal Audit Procedures and Records

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

*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.
*** Reportable Incidents that meet GO 167-C Section 9.4 that occurred within the 5 years.