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Midway Peaking CPUC Audit GA2024-27MP: Response

March 7, 2025

Christopher Villalobos
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

RE: Generation Audit of Midway Peaking Facility (Midway) – Audit Number GA2024-27MP

Dear Christopher Villalobos,
In response to the audit report regarding the generation audit of Midway Peaking from December 9-12, 2024, please see below for the Corrective Action Plan for the listed findings and observations.

If you have any questions or concerns regarding this audit, please contact Tony Gilmore at tgilmore@mrpgenco.com or Dan Mocodean at dmocodean@mrpgenco.com.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Ramiro Gonzalez', is written over a light blue horizontal line.

Ramiro Gonzalez
Plant Manager
Midway Peaking, LLC








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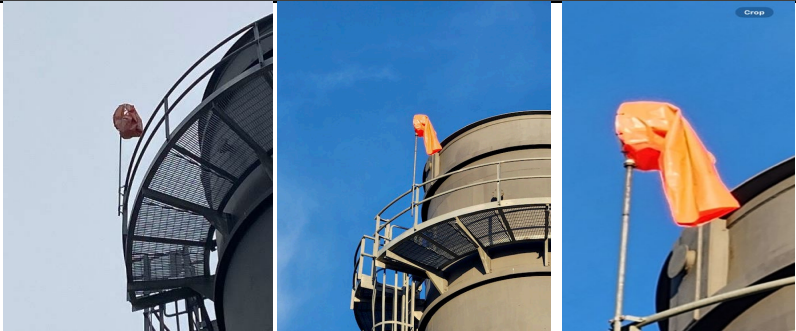
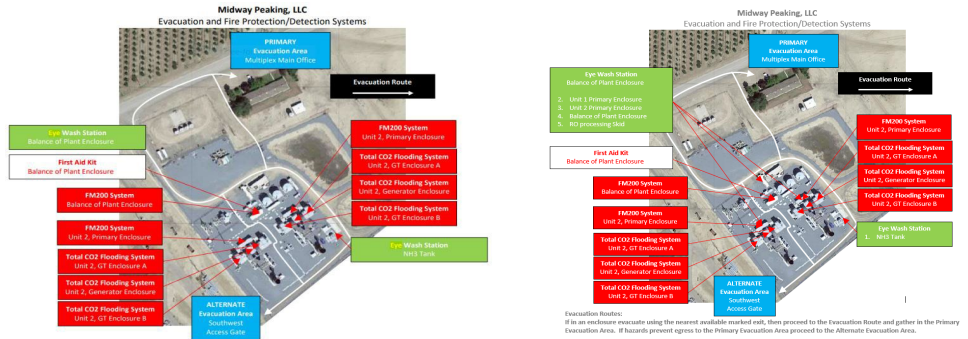
Midway Peaking Facility CPUC Audit GA2024-27MP: Response


CPUC Audit GA2024-27MP:
Midway Peaking Facility
December 9-12, 2024

CORRECTIVE ACTION PLAN

By
Midway Peaking, LLC
March 7, 2025

Finding #	Task	Target Completion Date	Task Lead	Status	Progress Notes	Pictures of Corrected Items
1	The Plant failed to respond to California Public Utilities Commission (CPUC) Information Requests by the due date.	12/4/2024	Midway Personnel	Completed	Information was submitted to CPUC as directed. All future document requests will be submitted by due date per CPUC GO 167-B 10.0, Information Requirements	
2	The Plant must report planned and forced outages to the Electric Safety and Reliability Branch's Power Plant Outage Report (PPOR).	12/12/2024	Midway Personnel	Continuous	Facility operators and management are aware of PPOR requirements. PPOR reporting has been reiterated to the operations group, and reinforcement training is scheduled.	
3	Electrical equipment cabinets labeled with an arc flash hazard sign and other high voltage electrical equipment must remain closed.	12/11/2024	Midway Personnel	Completed	Site technician informed of unlatched electrical cabinet and immediately corrected discrepancy	 
4	The Plant does not utilize the Job Hazard Analysis (JHA) program provided by NAES.	4/30/2025	Midway Personnel	Continuous	Will work to develop an tracking system of the JHA program. To be completed by April 30	
5	The Plant must improve coordination with the Authority having Jurisdiction (AHJ) for fire related events.	12/10/2024	Midway Personnel	Continuous	Facility Compliance has emailed and contacted Cal Fire Station 96 to coordinate for fire related events	
6	The Plant's fire protection systems require maintenance.	2/20/2025	Midway Personnel	Completed	Fire system was serviced and alarms were cleared. The screen displayed the alarm history.	
7	Portable fire extinguisher inspection and maintenance practices and tracking must be improved.	2/24/2025	Midway Personnel	Completed	The PM was updated with instructions to replace and update the fire extinguisher safety inspection tag every month	  

Finding #	Task	Target Completion Date	Task Lead	Status	Progress Notes	Pictures of Corrected Items
8	The Plant's windsock on top of Unit 2 is in disrepair.	2/22/2025	Midway Personnel	Completed	Replaced plant windsock	
9	Balance of Plant building must have a spill kit suitable for Direct Current (DC) batteries.	3/4/2025	Midway Personnel	Completed	Work order written. Ordering. WO MID8543.	
10	Emergency equipment was not available at the indicated location.	12/16/2024	Midway Personnel	Completed	Old First Aid signage was removed from outside storage container	
11	The Plant's Emergency eyewash stations exterior conditions must be improved.	3/4/2025	Midway Personnel	Completed	MID8539 Written to replace eyewash stations.	
12	The emergency eye wash signage must be replaced at the Ammonia Hydroxide tank.	3/4/2025	Midway Personnel	Completed	MID8540 Written to replace plant signage. First Shipment will arrive 3/7/25	
13	Eyewash stations must be labeled on the evacuation map and Spill Countermeasure and Control (SPCC) Plan.	3/4/2025	Midway Personnel	Completed	Map updated with 5 eyewash st locations	
14	Sign indicating danger for Ammonia Hydroxide must be replaced.	3/4/2025	Midway Personnel	Completed	MID8540 Written to replace plant signage. First Shipment will arrive 3/7/25	
15	NFPA diamond on the ammonia hydroxide tank is inaccurate and deteriorated.	3/4/2025	Midway Personnel	Completed	MID8540 Written to replace plant signage. First Shipment will arrive 3/7/25	
16	16: Spill containment bin is missing a NFPA 704 placard.	3/4/2025	Midway Personnel	Completed	MID8540 Written to replace plant signage. First Shipment will arrive 3/7/25	
17	Liquid filled drums stored outside are in poor condition.	7/10/2025	Midway Personnel	In progress.	Drums and content will be disposed with our next scheduled hazard disposal pickup.	
18	The confined space label on the oily water separator is painted over and illegible.	3/4/2025	Midway Personnel	Completed	MID8540 Written to replace plant signage. First Shipment will arrive 3/7/25	
19	Hydraulic filters are leaking oil.	11/30/2025	Midway Personnel	In Progress	WO MID6923 Written to address leak. OEM having difficulty sourcing replacement housing. Will look into alternative solutions.	

Finding #	Task	Target Completion Date	Task Lead	Status	Progress Notes	Pictures of Corrected Items
20	Front gate needs additional signage to improve safety.	5/20/2025	Midway Personnel	Completed	MID8540 Written to replace plant signage. First Shipment will arrive 3/7/25	
21	Turbine enclosure light must be replaced.	N/A	N/A	Completed	Turbine enclosure light. The observed fitting is a strobe light that is installed next to working enclosure light. The enclosure lighting is inspected for proper operation during the daily rounds conducted during the work week.	
22	Hazardous Material Business Plan references must be updated to the correct county.	12/12/2024	Midway Personnel	Completed	HMBP was updated during time of inspection	
23	Employees have not received the Hazardous Energy Control Program (Lock Out Tag Out) annual refresher training.	3/31/2025	Midway Personnel Management	Continuous	Training is scheduled with facility staff and conducted via Teams meetings and in person throughout year. If employee is absent, a follow up training session will be scheduled and documented. The person that was on PTO during the training is scheduled for training on March 17 2025	
24	Periodic audits of the Lock Out Tag Out Program must be conducted monthly and annually.	4/28/2025	Midway Personnel Management	Continuous	Audits of the Lockout Program will be conducted and documented for record-keeping. A tracking system will be developed by management.	
25	Confined space audits must be conducted - monthly and annually.	4/28/2025	Midway Personnel Management	Continuous	Audits of the Confined Space Program will be conducted and documented for record-keeping. Management will develop a tracking system and maintain proper documentation.	
26	The Plant does not keep procedures, policies, and programs in reference binders.	5/30/2025	Midway Personnel Management	Continuous	Verifying that existing hard copies of policies, procedures, and programs are up to date. A hard copy will be printed (with online access available) and placed in a binder at the facility for reference in required programs.	