

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 16, 2025

Joe Kennedy  
Plant Manager  
40140 Silver Valley Road  
Daggett, CA 92327

**SUBJECT: Generation and Energy Storage Audit of Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System Audit Number GA2025-10DS**

Dear Mr. Kennedy:

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 a Generation and Energy Storage audit of Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System from May 12 through May 15, 2025.

During the audit, ESRB observed plant operations, inspected equipment, reviewed data, interviewed plant staff, and identified potential violations of General Order (GO) 167-C. A copy of the audit findings itemizing the violations is attached. Please advise me by email no later than August 13, 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](mailto:emmanuel.salas@cpuc.ca.gov). Please note that although Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System have 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 Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System 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](mailto:GO167@cpuc.ca.gov) by August 13, 2025.

Please note that ESRB will also post the Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System 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](mailto:emmanuel.salas@cpuc.ca.gov) or (916) 347-6415.

Sincerely,

A handwritten signature in blue ink, which appears to read "Banu Acimis".

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

Attachment: CPUC Generation and Battery Energy Storage 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  
DAGGETT SOLAR POWER 2 & 3 AND  
BATTERY ENERGY STORAGE SYSTEM  
MAY 12 – MAY 15, 2025**

**I. Findings Requiring Corrective Actions.**

**Finding 1: Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System (Daggett) did not report a 2024 fire incident involving Inverter INV-82 to the California Public Utilities Commission (CPUC), as required.**

**General Order (GO) 167-C, Section 9.4** states:

*“Within 24 hours of its occurrence, a GAO or ESSO shall report to the Commission's emergency reporting website any safety-related incident involving a GA or ESS. If internet access is unavailable, the GAO or ESSO may report using the backup telephone system. Such reporting shall include any incident that has resulted in death to a person; an injury or illness to a person requiring overnight hospitalization; a report to Cal/OSHA, OSHA, or other regulatory agency; or damage to the property of the GAO or ESSO or another person of more than \$200,000; or involves a GA or ESS malfunction or failure resulting in fires, explosions, hazardous emissions, or safety related reports to other agencies. The GAO or ESSO shall also report any other incident involving a GA or ESS that has resulted in significant negative media coverage (resulting in a news story or editorial from one media outlet with a circulation or audience of 50,000 or more persons) when the GAO or ESSO has actual knowledge of the media coverage. If not initially provided, a written report also will be submitted within five business days of the incident. The report will include copies of any reports concerning the incident that have been submitted to other governmental agencies.”*

During the audit, Electric Safety and Reliability Branch (ESRB) inspectors identified a fire incident that occurred on April 1, 2024, involving Inverter INV-82 at Daggett 3. The incident resulted in the total loss of the inverter and caused property damage exceeding \$50,000, which met the incident reporting threshold specified in GO 167-B at the time of the incident. Despite meeting the California Public Utilities Commission (CPUC) incident reporting criteria, Daggett did not report this incident to the CPUC staff within the required 24-hour timeframe. All qualifying safety incidents must be reported to ensure timely regulatory oversight, investigation, and tracking of safety-related events. Daggett must implement procedures and train its personnel to ensure that all future incidents are reported to the CPUC in accordance with applicable requirements.

After ESRB inspectors identified this past incident, Daggett submitted the incident report for the inverter INV-82 fire to the CPUC on June 20, 2025.

**Finding 2: Daggett did not submit a compliant Hazard Mitigation Analysis (HMA).**

**2022 California Fire Code (CFC) Section 1207.1.4** states:

*“A failure modes and effects analysis (FMEA) or other approved hazard mitigation analysis shall be provided under any of the following conditions:*

- 1. Where ESS technologies not specifically identified in Table 1207.1 are provided;*
- 2. More than one ESS technology is provided in a room or enclosed area where there is a potential for adverse interaction between technologies.*
- 3. Where allowed as a basis for increasing maximum allowable quantities.”*

During the documentation review, ESRB inspectors requested an HMA for the facility’s Battery Energy Storage System (BESS). Daggett submitted a general battery hazard summary in spreadsheet format; however, this document did not meet the requirements of a compliant HMA under CFC §1207.1.4.1 The submittal did not evaluate the consequences of specific fault conditions such as thermal runaway, battery management system failure, or fire suppression failure, nor did it include any analysis to demonstrate compliance with the performance-based approval criteria outlined in CFC §1207.1.4.2.

Daggett must prepare and submit a complete, site-specific HMA that evaluates the required single-fault failure modes, demonstrates conformance with the fire code’s performance criteria, and reflects actual site conditions and equipment configurations. Daggett must submit the approved HMA to ESRB for review and verification.

**Finding 3: Daggett must update the BESS Emergency Response Plan (ERP) to ensure accuracy, completeness, and annual review.**

**GO 167-C, Appendix D, Operating 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 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 documentation review, ESRB inspectors found that the ERP for the BESS was outdated and missing key information. Daggett had not completed the required annual review of the ERP, and the document lacked Energy Storage System (ESS) contact details. Additionally, it contained placeholder or template language that had not been updated with site-specific information, even though it was labeled as the final version. An accurate, complete, and regularly reviewed ERP is essential to ensure that personnel can respond effectively in an emergency. Daggett must revise the BESS ERP to include current contact information, update any placeholder content with site-specific information, and document completion of the annual review process. Daggett must submit the updated ERP to ESRB for review and verification.

**Finding 4: Daggett must establish coordination with the local fire department.**

**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:*

*d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies”*

During the documentation review, ESRB inspectors found no evidence that Daggett had coordinated with the local or regional fire department regarding emergency response planning for the BESS facility. Daggett did not provide documentation demonstrating that the BESS ERP had been submitted to the county or shared with the fire department, as required under Senate Bill (SB) 38. In addition, Daggett did not maintain records of any past site visits, training sessions, or coordination exercises conducted with local fire agencies. Without established coordination and documentation, emergency responders may not be adequately prepared to respond to incidents at the facility.

Daggett must establish coordination with the local or regional fire department, submit the BESS ERP to the county, and provide the ERP to the fire department for review. Daggett must also maintain documentation of all fire department visits, training sessions, and coordination efforts

conducted on site. Daggett must submit supporting documentation verifying completion of these actions to ESRB for review and verification.

**Finding 5: Daggett must update Lock out Tag out (LOTO) procedures to reflect current procedures being followed.**

**GO 167-C, Appendix C, Maintenance Standard (MS) 8: Maintenance Procedures and Documentation** 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 D, OS 2: Organizational Structure and Responsibilities** states:

*“The organization with responsibility and accountability for establishing and implementing an operation strategy to support company objectives for reliable facility operation is clearly defined, communicated, understood, and is effectively implemented. Reporting relationships, control of resources, and individual authorities support, are clearly defined, and commensurate with responsibilities.”*

**GO 167-C, Appendix D, OS 14: Clearances** states:

*“Work is performed on equipment only when safe. When necessary, equipment is taken out of service, de-energized, controlled, and locked-out and/or tagged-out in accordance with a clearance procedure. Personnel are trained in the clearance procedure and its use, and always verify that equipment is safe before any work proceeds. Among other things:*

- a) The GA or ESS Owner prepares and maintains a clearance procedure.*
- b) The clearance procedure contains requirements for removing a component from service and/or placing a component back into service.*
- c) The GA or ESS Owner ensures that personnel are trained in and follow the clearance procedure.”*

ESRB inspectors observed that the written LOTO procedure currently in place at Daggett does not accurately reflect the specific practices being followed by staff during LOTO activities. Currently, LOTOs are being performed on paper, whereas the documented LOTO procedures call for the use of a software program. It is essential that the documented procedure aligns with actual field practices to maintain consistency and ensure worker safety. Site personnel informed ESRB inspectors that LOTO practices were being modified because the previous system was insufficiently effective. These new procedures must be formally documented and reviewed. Daggett must review and revise its LOTO procedure to ensure it accurately reflects current practices, equipment, and staff responsibilities. Daggett must also provide the updated LOTO procedures to ESRB for review and verification.

**Finding 6: Hot Sticks in Silver Springs Substation indicated that the equipment was due for biennial inspection**

**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 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...”*

Daggett maintained live-line tools ("hot sticks") in the Silver Springs substation for performing energized work; however, ESRB inspectors observed that these tools had a last service date of January 2023. Based on applicable industry standards and safety regulations, these tools are required to be put out of service or inspected and tested once every two years. ESRB inspectors noted that this equipment was removed from service at the time of the inspection. Daggett must provide ESRB with the latest inventory list of hot sticks in place and their inspection records.



Figure 1: Outdated hot sticks left in the substation control house.

**Finding 7: NOVEC fire suppression system in server room lacks inspection documentation.**

**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:

*“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 1: Safety** states:

*“The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company 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 assures that data, reports and other records reasonably necessary for ensuring proper operation and monitoring of the generating asset are collected by trained personnel and retained for at least five years, and longer if appropriate.”*

ESRB inspectors observed that Daggett has a NOVEC fire suppression system installed in the server room of the operations building. Daggett did not provide any inspection records or supporting documentation for this system during the audit. It is essential that all fire suppression systems are either properly maintained with documented inspections or formally decommissioned to prevent safety hazards and ensure regulatory compliance. Site personnel indicated during the audit that the NOVEC system is scheduled for removal because the server room does not house any server equipment as originally intended and does not need the NOVEC system. Daggett must either provide ESRB with a timeline for decommissioning the NOVEC fire suppression system



or provide a timeline for completing a full inspection of the system by qualified personnel, along with proper documentation to verify compliance.



Figure 2: NOVEC system found in server room.

**Finding 8: The Plant did not identify or document the high temperature alarm on the Hydran M2-X serving Transformer T1 at Silver Springs Substation.**

**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 site inspection, ESRB inspectors observed multiple active alarms on Generator Step-Up (GSU) transformer monitoring equipment. In each case, Daggett staff had not identified the alarm condition, and no associated documentation or work orders were available for review. This lack of alarm awareness, combined with the absence of tracking in the work order system, indicates that the Plant must improve its procedures for alarm monitoring and response documentation.

Daggett must evaluate the following alarm conditions, document all findings and corrective actions, and ensure that transformer alarms are routinely reviewed and recorded in the work order

management system. Daggett must submit the resulting work orders and evaluation summaries to ESRB for review and verification:

1. ESRB inspectors observed that the Hydran M2-X gas monitoring system installed on GSU Transformer T1 at the Silver Springs Substation displayed a high temperature alarm.



Figure 3: GSU Transformer T1 Hydran M2-X gas monitoring system with an active alarm.

2. ESRB inspectors observed that the SEL-2414 monitoring device on GSU Transformer T2 at the Silver Springs Substation displayed an active “AC supply fail or undervoltage” alarm.

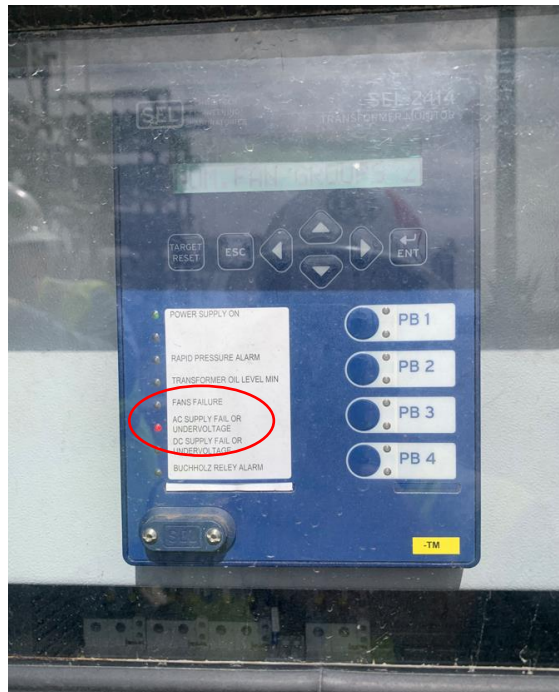


Figure 4: GSU T2 Transformer monitor with an active alarm.

3. ESRB inspectors observed that the SEL-2414 monitoring device on GSU Transformer T1 at the Cumberland Substation displayed active “AC supply fail or undervoltage” and “DC supply fail or undervoltage” alarms.

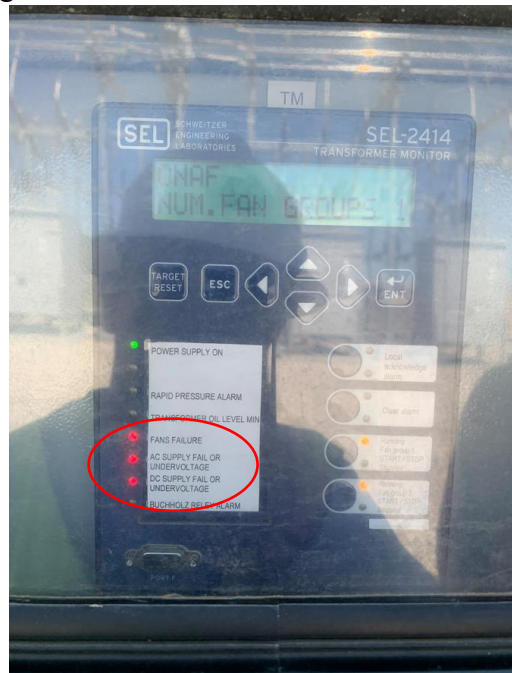


Figure 5: GSU T1 Transformer monitor with active alarms.

**Finding 9: The Plant did not provide vegetation management procedures that clearly define the tasks and steps required to perform vegetation management at the facility.**

**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 8: Maintenance Procedures and Documentation** 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 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 requested vegetation management procedures that outline how the facility performs vegetation control tasks. Daggett did not provide procedures that clearly define the specific steps, responsibilities, or safety practices required to conduct vegetation management. The absence of defined procedures may lead to inconsistent work practices, increased risk to personnel, and potential impacts to equipment reliability or fire safety.

A comprehensive vegetation management procedure for a solar and battery energy storage facility should describe the vegetation control methods employed, specify the required frequency and seasonal timing of maintenance activities, establish appropriate clear zones or setback distances around equipment, address fire prevention measures, and include safety protocols for performing work near energized components. The procedure should also consider environmental protection and wildlife impacts, assign responsibilities to internal personnel and contractors, and clearly define how vegetation management activities are tracked and documented. Daggett must develop and implement a vegetation management procedure that addresses these key elements and reflects site-specific conditions. Daggett must submit the completed procedure to ESRB for review and verification.

**Finding 10: Visitor and contractor orientation is missing site-specific 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 direction, and are used to support safe and reliable plant operation...”*

ESRB inspectors noted that the visitor and contractor orientation is lacking critical site-specific safety and environmental information. It is paramount that all personnel entering the Daggett site understand evacuation routes and muster point locations to safely respond in the event of an emergency. Daggett must revise the orientation program to include clearly labeled evacuation paths, muster points, and the layout of the O&M building. The orientation must also address site-specific hazards, including protected and hazardous species risks, to ensure all individuals are

adequately informed prior to site access. For example, staff were informed snakes were not a notable hazard on site, however staff interviews noted that there were several snake sightings this year. Visual elements, such as a site map with evacuation routes and muster points, should be incorporated into the orientation to support comprehension.

Additionally, ESRB inspectors noted inconsistent delivery methods for the visitor and contractor orientation. Inspectors received a PowerPoint presentation prior to site arrival; however, the onsite orientation was conducted using a video presentation. A standardized delivery format is recommended to ensure consistent messaging and to streamline future updates.

Finally, the orientation materials should include a formal verification process (e.g., acknowledgement form or comprehension check), be reviewed at least annually or following any material changes to the site layout or hazard profile and maintain a documented revision history to ensure version control and traceability of updates (e.g. include the date of last revision on the presentation). Daggett must submit the updated site-specific visitor and contractor orientation to ESRB for review and verification.

**Finding 11: Emergency Action Plan (EAP) must be updated to reflect current site conditions.**

**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 direction, and are used to support safe and reliable plant operation.”*

**GO 167-C, Appendix D, OS 20: Preparedness for On-Site and Off-Site Emergencies** states in part:

*“The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off CSE site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of CSE.*

- A. Plans for the continuity of management and communications during emergencies, both within and outside CSE,*
- B. Trains personnel in the emergency plan periodically, and*
- C. Ensures provision of emergency information and materials to personnel.”*

ESRB inspectors reviewed Daggett’s emergency evacuation plan map in the EAP and found that the site muster point locations needed to be updated to reflect current plant conditions. The main muster point was indicated as being located at the front main gate; however, ESRB inspectors

observed no signage at the main gate designating it as an assembly point. Daggett must clearly mark all muster points on the evacuation plan map and install clear signage at each designated muster point.

Further, ESRB inspectors found that a stretcher was referenced in the EAP as being available on site for emergency use, but no stretcher was present at the facility. Daggett must either add a stretcher in the locations specified in the EAP or remove references to the stretcher from the plan. Daggett should also review the EAP annually to ensure it remains accurate and up to date.

Physical copies of the EAP also need to be updated to match the current digital version. ESRB inspectors observed that posted physical copies contained outdated information inconsistent with the electronic copy stored on Daggett servers. Daggett must ensure that any revisions to the EAP are reflected in physical copies around the site to maintain consistency and accuracy.

**Finding 12: Daggett evacuation drills need improved record keeping and documentation.**

**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 17: Records of Operation** states:

*“The GAO assures that data, reports and other records reasonably necessary for ensuring proper operation and monitoring of the generating asset 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 plans for, prepares for, and responds to reasonably anticipated emergencies on and off CSE site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of CSE.*

- A. Plans for the continuity of management and communications during emergencies, both within and outside CSE,*
- B. Trains personnel in the emergency plan periodically, and*
- C. Ensures provision of emergency information and materials to personnel.”*

ESRB inspectors observed that Daggett is not currently maintaining sign-in sheets, debrief notes, or any documented lessons learned and areas for improvement resulting from evacuation drills. It is essential that evacuation drills be fully documented to verify employee participation, identify potential gaps in emergency response procedures, and drive continuous improvement in site safety. Daggett must ensure that all future evacuation drills include participant sign-in sheets, formal debriefings, and written summaries of lessons learned and corrective actions.

**Finding 13: Inadequate documentation control across multiple safety and operational records.**

**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..”*

ESRB inspectors observed that Daggett’s documentation control practices are insufficient, with several records either missing or unavailable at the time of the audit. It is essential that all safety, maintenance, and incident-related documentation be consistently maintained and readily accessible. During the audit, examples of missing or incomplete documentation included fire drill records, reports related to the Inverter 82 fire, root cause analyses (RCAs), weekly Nextracker completed work orders, and substation battery inspection records. Additionally, the documentation that was provided contained minimal detail regarding the work performed. Daggett must implement a comprehensive documentation control system to ensure that all required records are complete, detailed, and readily retrievable, and must submit its implementation plan to ESRB for review and verification.

**Finding 14: Windssocks are not installed on site.**

**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 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 20: Preparedness for On-Site and Off-Site Emergencies** states in part:

*“The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant.”*

ESRB inspectors observed that no windssocks were installed on site. During the site safety briefing, staff referenced two muster point gates and advised personnel to proceed to the

appropriate location based on the location of a potential fire and to remain upwind of the hazard. To support this guidance and facilitate rapid determination of wind direction during an emergency, staff should install at least one windsock in a visible location. This will assist personnel in making timely, informed decisions regarding evacuation direction and muster point selection.

**Finding 15: National Fire Protection Association (NFPA) 704 Placards at front gate does not reflect highest site hazards.**

**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 the NFPA 704 hazard identification placard posted at Daggett’s front gate does not reflect the highest hazards present on-site, including chemicals located within the substations. It is essential that placards be installed to inform emergency responders, Daggett personnel, and visitors of the highest chemical hazards that may be encountered at the site. During the audit, Daggett stated that the existing NFPA 704 placards were posted based on a request from Certified Unified Program Agency (CUPA) during their most recent inspection. Daggett must either provide documentation verifying that CUPA specifically requested the hazards currently displayed on the placards or update the placards to indicate the highest hazard levels for each category, including hazards present within the substations.





Figure 6: Daggett's front gate.

**Finding 16: Daggett must ensure that all controlled documents are reviewed annually, signed off accordingly, and that the most current versions are available for audit review.**

**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.”*

**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.”*

During the documentation review, ESRB inspectors noted that several controlled documents were not signed off following annual review and that the versions provided were not clearly marked as current or final. Accurate version control and timely review of critical documents are essential to ensure that personnel are referencing up-to-date procedures and safety plans. Documents identified with incomplete or outdated version control included the *Daggett Safety Emergency Action Plan 1.0*, *Environmental Chemical Management Program Rev. 4*, *Clearway EHSMS Program R.7*, and *LOTO Procedure R.4*. Daggett must ensure that all controlled documents undergo formal annual review and sign-off, and that current, finalized versions are maintained and made available during audits. Daggett must submit updated, signed versions of these documents to ESRB for review and verification.

## **Finding 17: Fire Extinguishers Missing Monthly Checks**

**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 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 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."*

**NFPA 10 (2022), Section 7.2.1.2.1** states:

*"Fire extinguishers and Class D extinguishing agents shall be inspected at least once per calendar month."*

**Cal OSHA Section 6151(e)(2)** states:

*"Portable extinguishers... shall be visually inspected monthly"*

ESRB inspectors observed portable fire extinguishers in the Operations and Maintenance (O&M) building with gaps in their monthly inspection records. Monthly inspections are a required component of fire safety programs and are necessary to ensure fire extinguishers are in proper working condition and immediately available for use in the event of an incipient fire. Missing these inspections compromises the effectiveness of the safety program. Based on conversations with plant staff, management is aware of this issue from the monthly inspections conducted recently.

The Plant must ensure monthly inspections are consistently performed on all portable fire extinguishers located throughout the facility as required by NFPA 10 and Cal OSHA, and that inspection records are accurately documented and readily available.



Figure 7: Fire extinguisher with missing monthly inspections.

### **Finding 18: Expired Medication was found in Silver Springs Substation**

#### **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.”*

**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...”*

ESRB inspectors observed that the first aid kit located in the Silver Springs Substation contained expired medication. While first aid kits are intended to provide immediate treatment for minor injuries or stabilize individuals until professional medical help arrives, expired medical supplies may have reduced efficacy or present safety concerns. Maintaining up-to-date supplies is a critical component of a site's emergency readiness and compliance with workplace health and safety standards. Inspectors did take note that the first aid kit was replaced by the site manager during the week of the audit.

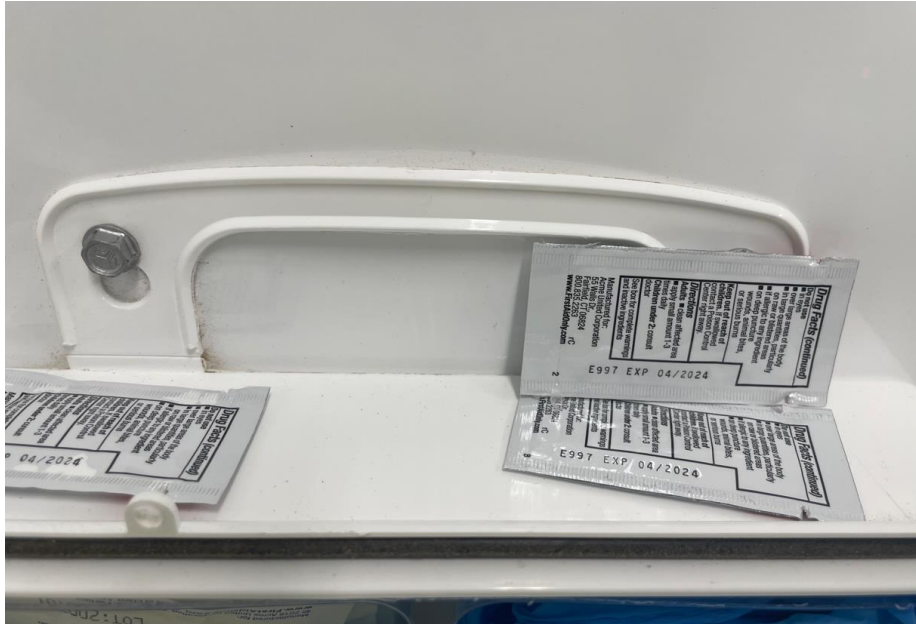


Figure 8: Expired medication found in the Silver Springs Substation first aid kit.

**Finding 19: Daggett did not submit all requested documents for the audit.**

**GO 167-C, 10. Information Requirements, Section 9.1 Provision of Information** states in part:

*“Upon SED’s request, a GA or ESS Owner shall provide information in writing concerning (a) a GA or ESS; (b) the operation or maintenance of the GA or ESS; (c) the Initial Certification, Recertification, Corrective Plan, or Notice of Material Change pertaining to the GA or ESS; (d) any Maintenance, Operation, or Corrective Plans pertaining to the GA or ESS; (e) the design, performance, or history of a GA or ESS; (f) event or outage data concerning a GA or ESS including, but not limited to, unavailability reports or outage cause reports; ...”*

**GO 167-C, 10.0 Audits, Inspections, and Investigations, Section 10.1 General Requirement** states:

*“A GA or ESS Owner shall cooperate with SED during any audit, inspection, or investigation (including but not limited to tests, technical evaluations, and physical access to facilities). An audit, inspection, or investigation may*

*extend to any records pertaining to the specifications, warranties, logbooks, operations, or maintenance of the GA or ESS. GA and ESS Owners as entities subject to ongoing regulation under this General Order, are hereby General Order 167-C notified that these audits, inspections, or investigations will occur on a regular, systematic, and recurring basis supplemented as needed by additional audits, inspections, or investigations to ensure compliance with this General Order..”*

ESRB inspectors noted that Daggett did not submit several documents as requested in the pre-audit data request. The data request included 73 items and specified which documents could be presented on site versus which were required to be submitted electronically. However, several items explicitly requested for electronic submission, including oil sample reports, Quantum manuals, and daily rounds sheets, were not submitted prior to the audit. Instead, Daggett presented these documents on site during the audit, where ESRB inspectors reviewed them. Reviewing documents during the audit limits the ability of ESRB inspectors to fully analyze and evaluate them with the time and depth needed. In the future, Daggett must ensure that all documentation requested through the pre-audit data request is provided to ESRB inspectors prior to the audit and by the specified due date.

## II. CPUC-REQUESTED DOCUMENTS

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors**
	2	Evacuation Procedure
	3	Evacuation Map and Plant Layout
	4	Evacuation Drill Report & Critique (last 3 years)
	5	Hazmat Handling Procedure
	6	MSDS for All Hazardous Chemicals
	7	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	8	OSHA Form 300 (Injury Log) in last 4 years
	9	OSHA Form 301 (Incident Report) in last 4 years
	10	List of all CPUC Reportable Incidents (last 5 years)
	11	Root Cause Analysis of all Reportable Incidents (if any)
	12	Fire Protection System Inspection Record and Fire Sprinklers Test Report (last 3 years)
	13	Insurance Report / Loss Prevention / Risk Survey (last 3 years)
	14	Lockout / Tagout Procedure (last 3 revisions, if applicable)
	15	Arc flash Analysis
	16	Confined Space Entry Procedure
	17	Plant Physical Security and Cyber Security Procedures and Records
Training	18	Safety Training Records*
	19	Skill-related Training Records*
	20	Certifications for Welders, Forklift & Crane Operators*
	21	Hazmat Training Record*
Contractor	22	Latest list of Qualified Contractors*
	23	Contractor Selection / Qualification Procedure
	24	Contractor Certification Records
	25	Contractor Safety Program Procedure and Training Records
Regulatory	26	Water Permit (if applicable)
	27	Spill Prevention Control Plan (SPCC) (if applicable)
	28	CalARP Risk Management Plan (RMP)

O&M	29	Daily Round Sheets / Checklists
	30	Logbook**
	31	List of Open/Backlogged Work Orders*
	32	List of Closed/Retired Work Orders (last 3 years)*
	33	Work Order Management Procedure (last 3 revisions, if applicable)
	34	Computerized Maintenance Management System (Demonstration On-site)**
	35	All Root Cause Analyses (if any)
	36	Maintenance & Inspection Procedures, or Related Documents (last 3 revisions, if applicable)
	37	SCADA system (Demonstration On-site)**
	38	Maintenance and Inspection Records for Solar Inverters
	39	Maintenance and Inspection Records for Solar Trackers
	40	Maintenance and Inspection Records for Solar Arrays/Collectors/Solar Field
	41	Maintenance and Inspection Records for Mounting System
	42	Maintenance and Inspection Records for Switchgear/breaker/relays
	43	Maintenance and Inspection Records for Electrical System
	44	Maintenance and Inspection Records for Main Transformer(s)
	45	Maintenance and Inspection Records for Switchyard & Transmission Equipment
	46	Maintenance and Inspection Records for other equipment
	47	Transformer Oil Analysis Records (last 3 years)
	48	Emergency Generator Test and Maintenance Records (last 3 years)
	49	Substation Battery Test and Maintenance Records (last 3 years)
	50	Vegetation Management Procedure and Policy
B.E.S.S.	51	Maintenance and Inspection Procedures, or Related Documents
	52	Maintenance and Inspection Records
	53	Compliance Capacity Testing Records
	54	Fire Suppression System Inspection and Testing Logs
	55	Original Equipment Manufacturer (OEM) Manual
	56	Thermal Management System Inspection Records
	57	BESS Emergency Action Plan
	58	Records of Emergency Response Training, Emergency Drills and any Joint Emergency Drills with Local First Responders.
	59	Failure Modes and Effects Analysis (FMEA) or Hazard Analysis
	60	Operations Procedure
	61	Thermal Imaging and Hotspot Detection Reports
	62	Records of all system outages and incidents of thermal runaway

Documents	63	P&IDs*
	64	Vendor Manuals*
	65	Solar Farm Equipment Design Data
	66	Procedure Compliance Policy
Spare Parts	67	Spare Parts Inventory List
	68	Shelf-life Assessment Report
Management	69	Organizational Chart
Instrumentation	70	Instrument Calibration Procedures and Records
Test Equipment	71	Measuring & Testing Equipment List
	72	Test Equipment Calibration Procedures and Records
Internal Audit	73	Internal Audit Procedures and all 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.