

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 20, 2026

Justin Smith
REV Renewable – Senior Associate Asset Manager
Diablo Energy Storage

SUBJECT: General Order (GO) 167-C Audit of Diablo Energy Storage, Audit Number ES2025-05DB

Dear Mr. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Banu Acimis, Ryan Hart, Christopher Villalobos, and Ian Rawnsley of ESRB staff conducted an Energy Storage System Audit of Diablo Energy Storage from November 3 through November 6, 2025.

During the audit, ESRB observed site 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 and an observation is attached. Please advise me by email no later than March 20, 2026, by providing an electronic copy of all corrective actions and preventive measures taken and/or planned to be taken to resolve the violations.

Your response should include a Corrective Action Plan with a description and completion date of each action and measure completed. For any violations not corrected, please provide the projected completion dates to correct the violations and achieve full compliance with GO 167-C.

Please submit your response to Christopher Villalobos at Christopher.Villalobos@cpuc.ca.gov. Please note that although Diablo Energy Storage has been given 20 business 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 Diablo 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 Christopher Villalobos with a copy to me and the GO 167 inbox GO167@cpuc.ca.gov by March 20, 2026.

Please note that ESRB will also post Diablo 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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Thank you for your courtesy and cooperation throughout the audit process. If you have any questions concerning this audit, please contact Christopher Villalobos at Christopher.Villalobos@cpuc.ca.gov or (916) 268-7732.

Sincerely,

A handwritten signature in blue ink, appearing 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 Energy Storage Audit Findings

Cc: Lee Palmer, Deputy Executive Director of Safety Enforcement, Safety Policy, and Water, CPUC
Eric Wu, Program Manager, ESRB, Safety and Enforcement Division (SED), CPUC
Ryan Hart, Senior Utilities Engineer - Supervisor, ESRB, SED, CPUC
Christopher Vilalobos, Utilities Engineer, ESRB, SED, CPUC
Ian Rawnsley, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF Diablo Energy Storage November 3-6, 2025

I. Findings Requiring Corrective Action

Finding 1: Diablo Energy Storage’s primary maintenance, and Engineering, Procurement, and Construction (EPC) contractor, failed to follow prudent maintenance standards and documentation protocol.

General Order (GO) 167-C Appendix A, Generating Asset and Energy Storage System Logbook Standards Exceptions states in part:

“In lieu of logging outstanding maintenance activities, a work order management system or electronic database system may be utilized at the discretion of the GAO or ESSO to track maintenance activities and status. This method of recordkeeping is intended to keep track of maintenance records according to maintenance requirements of original equipment manufacturers or industry best practices. Information in the work order management shall include the following but is not limited to:

- *Equipment issue;*
- *Work order tracking number;*
- *Date and time the work order was issued and completed;*
- *Names of persons who created, approved work orders and performed the work;*
- *Maintenance requirement (e.g., OEM recommendation, Non-Destructive Examination, Post heat treatment, etc.);*
- *Maintenance activities performed;*
- *Parts and tools information;*
- *Job safety and environmental analysis information;*
- *Permit information such as hot work, confined space entry, etc.”*

GO 167-C, Appendix C, Maintenance Standard (MS) 3: Maintenance Management and Leadership states:

“Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities.”

GO 167-C, Appendix C, MS 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.”

Prior to the site visit, Diablo Energy Storage’s (Diablo) asset owner, REV Renewables, informed the Electric Safety and Reliability Branch (ESRB) that the site had not renewed its contract with the primary maintenance contractor, [REDACTED] who also served as the EPC contractor. The site began commercial operations in Spring 2022. Diablo provided ESRB with the limited documentation made available by [REDACTED] covering the term of the maintenance services contract. After reviewing the information provided, ESRB Inspectors identified several deficiencies in [REDACTED] role as the primary maintenance contractor and its management of maintenance practices and the documentation protocols during commercial operations at the site.

[REDACTED] lacked a formal maintenance management system to track and verify the completion of maintenance activities, which indicates ineffective execution and management of maintenance activities. [REDACTED] maintained incomplete records of completed maintenance activities for critical equipment, including battery racks, power conversion systems (PCS), Heating, Ventilation, and Air Conditioning (HVAC), chiller units, and fire protection systems. Beginning in 2023, REV Renewables shared [REDACTED] annual maintenance plan and schedules, outlining the plans to complete maintenance for critical systems. [REDACTED] could not provide verification of the completion of any of the scheduled items, could not confirm if these items were completed without issues, or track corrective maintenance work orders (WO) until resolution. As a maintenance provider to a utility-scale energy storage system, [REDACTED] is required to follow prudent maintenance practices under GO 167-C, including logging maintenance activities in a logbook, work order management system, or equivalent electronic database. Without a work order management system, [REDACTED] could not effectively track essential details such as task descriptions, the date and time the task was completed, staff responsible for completion, and the outcome of the task, including equipment issues and all follow-up actions like corrective maintenance work orders.

Due to [REDACTED] deficient maintenance management system and lack of a work order management system or computerized maintenance management system (CMMS), [REDACTED] could not track work order completion or the status of follow-up issues identified during routine maintenance. As a result, deficiencies went untracked and unresolved. For example, a February 2024 fire alarm inspection report noted that 25 fire suppressant cannisters were not properly mounted to the BESS cube as required by the original equipment manufacturer (OEM). The report did not include a corrective action plan or confirm that the issue was resolved at the time of inspection. Similarly, a December 2024 fire alarm inspection report indicated that 63 sets of 12V18Ah batteries and 6 sets of 12V26Ah batteries in the BESS cubes’ fire alarm control panels (FACP) failed testing and required replacement. Based on the inspection reports, ESRB Inspectors could not confirm if the issue was resolved or if there was a plan for correcting the issue. A robust work order management system would have allowed for continuous tracking of

these deficiencies until closure. During ESRB's site visit, REV Renewables contacted the fire contractor and confirmed the status of the deficiencies noted in the inspection report. The FACP batteries did not need replacement because the fire contractor had misinterpreted the test results. Similarly, REV Renewables confirmed the fire suppressant cannisters are properly mounted. An example of a properly mounted fire suppressant cannister is shown in Figure 1. The status updates for all identified issues must be tracked by Fluence or the service provider to confirm resolution.



Figure 1: Fire Suppressant properly mounted in BESS cube

An example of [REDACTED] inadequate record keeping is its failure to document subcontracted work performed by [REDACTED] on the fire system. [REDACTED] could not provide any records of work completed by [REDACTED] in response to ESRB's pre-audit data request or while on site. Because [REDACTED] did not maintain these records, ESRB Inspectors could only review a portion of the fire system inspection test and maintenance (ITM) records for the site's operational life. [REDACTED] provided limited ITM records for inspections of fire hydrants, fire extinguishers, and fire alarm panels beginning in late 2023. Specifically, [REDACTED] provided routine fire alarm inspection reports for February 2024 and December 2024 and an additional emergency service inspection report for the fire alarm system was provided for August 2024.

Tracking and completion of maintenance tasks and any resulting corrective maintenance work orders is essential for site reliability through proactive preventative maintenance (PM), predictive maintenance, and problem resolution. Without a maintenance management system, incomplete tasks and unresolved issues can compromise critical equipment and increase facility risk. Although [REDACTED] contract was not renewed, Diablo is required to ensure outstanding operations and maintenance issues identified during [REDACTED] contract term are resolved. As part of Diablo's audit report response, Diablo must provide a list of all open items and a closure plan, including the party responsible and estimated completion dates for each activity. Diablo is transitioning internally managed maintenance program under REV Renewables. In doing so, the site must demonstrate proper execution and documentation of maintenance activities that are compliant with GO 167-C. For additional context on the internal maintenance program, refer to *Observation 1*.

Finding 2: Communication of evacuation routes and the evacuation procedures must be improved.

GO 167-C, Appendix D, Operation Standard (OS) 1: Safety states:

“The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company’s behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures.”

GO 167-C, Appendix D OS, 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;*
- b) Trains personnel in the emergency plan periodically;*
- c) Ensures provision of emergency information and materials to personnel;*

Diablo's main office building did not have a site map identifying emergency egress routes or muster points. Diablo must add a site map to the facilities main office building that clearly identifies emergency exit routes, muster points, and the location of critical safety equipment like fire extinguishers, first aid kits, and automated external defibrillators (AED). Diablo is required to ensure all critical safety and emergency information is readily available for staff, visitors, and contractors. A map with the muster point clearly labeled is particularly important at Diablo

because the muster point is located outside the facility's perimeter gate in a shared business park parking lot, where a physical sign cannot be installed.

Diablo did not adequately communicate evacuation procedures through the front gate during the contractor and visitor orientation. Access to and egress from Diablo is controlled by an electrically powered rolling gate requiring keycard access. During orientation, Diablo did not explain how to exit through the gate in the event of site power loss or if an individual is separated from Diablo staff with the gate access keycard. Diablo must communicate evacuation plans that comply with National Fire Protection Association (NFPA) 101 Life Safety Code requirements, which mandate emergency egress routes shall not be compromised in the event of power loss. During the audit, Diablo explained evacuation methods for these scenarios, and while ESRB Inspectors determined these were adequate, Diablo must communicate these procedures upon arrival during initial safety orientation.

Finding 3: CMMS preventive maintenance (PM) inspections task lists are not being completed.

GO 167-C, Appendix A, Generating Asset and Energy Storage System Logbook Standards, III. Logbook Requirements states in part:

“Exceptions:

- 1. In lieu of logging outstanding maintenance activities, a work order management system or electronic database system may be utilized at the discretion of the GAO or ESSO to track maintenance activities and status. This method of recordkeeping is intended to keep track of maintenance records according to maintenance requirements of original equipment manufacturers or industry best practices.”*

GO 167-C, Appendix C, MS 3: Maintenance Management and Leadership states:

“Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities.”

GO 167-C, Appendix D, OS 16: Participation by Operations Personnel in Work Orders states in part:

“Operations personnel identify potential system and equipment problems and initiate work orders necessary to correct system or equipment problems that may inhibit or prevent facility operations. Operations personnel monitor the progress of work orders affecting operations to ensure timely completion and closeout of the work orders, so that the components and systems are returned to service. Among other things:

- a) Operations personnel identify problems requiring work orders, and initiate work orders to correct those problems”*

Since taking over site responsibilities at Diablo, REV Renewables has used digital WOs in CMMS to schedule PMs that their technicians complete. The digital WOs for those PMs have task lists to direct technicians on what work must be done for the PM. Diablo has signed off

WOs as being fully completed; however, individual task list items are not being marked as complete, failed, or not applicable. Diablo must complete the individual task and mark each as completed, not applicable, or failed. Failures must have notes or corrective actions.

One instance identified by ESRB inspections is the HVAC PM task list shown in Figure 2. Diablo did not complete the task list, creating ambiguity to determine whether each individual task as part of the PM is being completed successfully, not applicable, or failed. The tracking of completed and failed items is critical to ensure deficiencies are either corrected immediately or tracked to completion through a corrective maintenance work order. Diablo must communicate the expectation for completing work orders to technicians, emphasizing the importance of completing the task list for each WO. Diablo must review and if necessary, update its WO and PM training procedures to communicate the expectation that all PM task lists be completed.



Figure 2: Example of an incomplete WO task list

Finding 4: Spill Prevention Control and Countermeasure (SPCC) inspections must be more specific.

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 13: Routine Inspections states:

“Routine inspections by facility personnel ensure that all areas and critical parameters of facility operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed. Results of data collection and monitoring of parameters during routine inspections are utilized to identify and resolve problems, to improve facility operations, and to identify the need for maintenance. All personnel are trained in the routine inspection procedures relevant to their responsibilities. Among other things, each GAO or ESSO creates, maintains, and implements routine inspections by:

- a) *Identifying systems and components critical to system operation such as, but not limited to, those listed in the guidelines to Operating Standard 28.*

- b) *Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels.*
- c) *Training personnel to conduct routine inspections.*
- d) *Monitoring and conducting trend analysis from routine inspections.”*

Title 40, Code of Federal Regulations (CFR) Part 112.7, General Requirements for Spill Prevention Control and Countermeasure *states in part:*

“(c) Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in § 112.1(b), except as provided in paragraph (k) of this section for qualified oil-filled operational equipment, and except as provided in § 112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs.”

*“(k) **Qualified Oil-filled Operational Equipment.** The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.*

***(1)Qualification Criteria—Reportable Discharge History:** The owner or operator of a facility that has had no single discharge as described in § 112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in § 112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil discharges as described in § 112.1(b) that are the result of natural disasters, acts of war or terrorism); and*

***(2) Alternative Requirements to General Secondary Containment.** If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:*

- (i) Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge;”*

Diablo’s SPCC inspection procedures reviewed during the audit did not specifically require checks of the secondary containment areas for the Generator Step-Up (GSU) transformer or Medium Voltage Transformer (MVT) paired with each PCS. Each MVT contains ■■■ gallons of

██████████. As stated in Title 40, CFR 112.7, the secondary containment must be sufficient to contain this quantity of oil until cleanup, unless an inspection program compliant with subsection (k) is in place. The secondary containment pictured below is not adequate to contain the volume of oil that may be released during a severe leak. Diablo must regularly inspect secondary containment areas for operating MVTs for signs of leaks accumulating, debris in the containment, and blockages to the drain. This lack of specificity created ambiguity in inspection scope and risked incomplete compliance with spill prevention requirements. While Diablo updated its SPCC inspection procedure during the audit to clearly include verification of GSU secondary containment integrity and inspection of MVTs, the company must train staff in the updated procedure and include how to identify the presence of oil in water or other debris of concern.

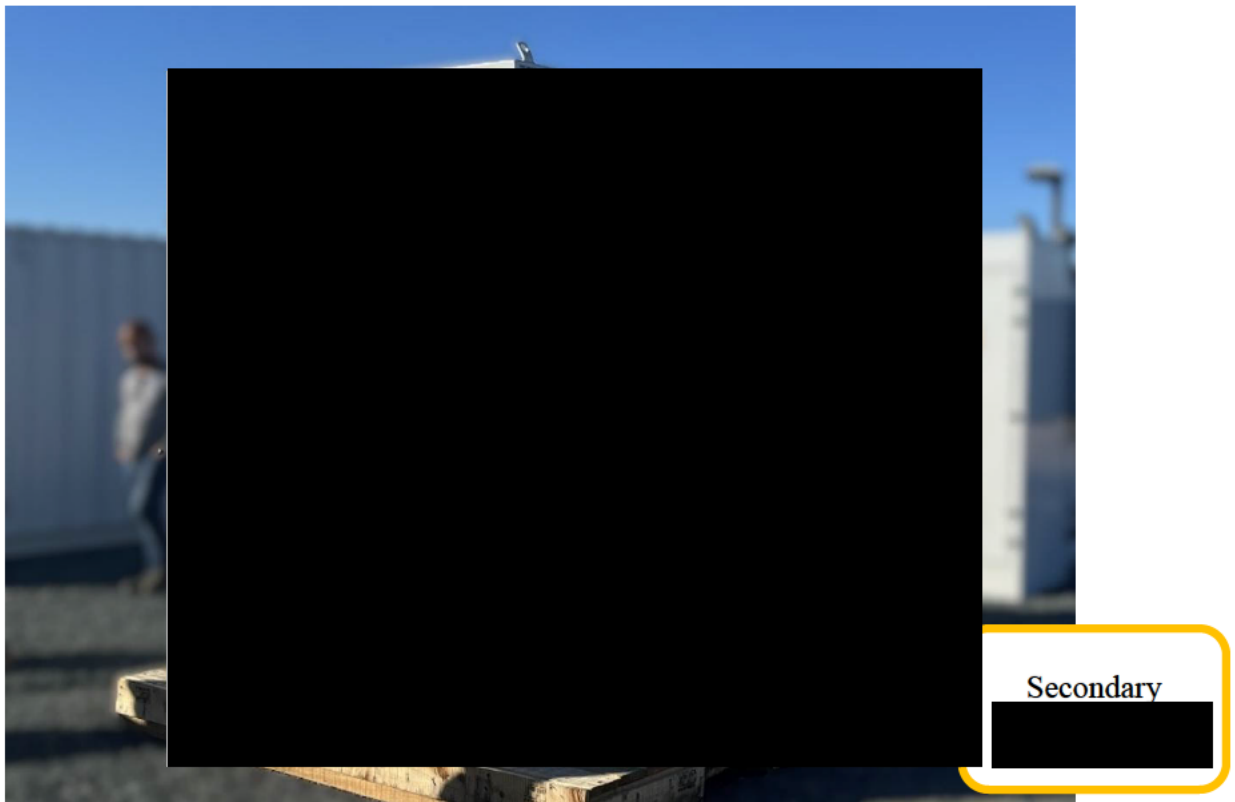


Figure 3: Example of MVT secondary containment

Finding 5: Diablo’s infrared camera exceeds the required calibration interval.

GO 167-C, Appendix C, MS 11: Facility Status and Configuration states:

“Station activities are effectively managed, so facility status and configuration are maintained to support safe, reliable, and efficient operation.”

GO 167-C, Appendix C, MS 18: Maintenance Facilities and Equipment states:

“Facilities and equipment are adequate to effectively support maintenance activities.”

ESRB Inspectors identified that Diablo’s infrared (IR) camera exceeded the calibration period of 12 months. This identifies a gap in the facility’s maintenance program. Diablo is required to confirm equipment is adequate to effectively support maintenance activities. As a result of the IR camera exceeding the calibration interval, the reliability and validity of inspections that depend on infrared imaging to detect potential equipment failures is compromised, increasing the risk of undetected faults, inaccurate, or false assessments. Diablo must incorporate the IR camera into the site’s test equipment calibration procedure and recurring work notification in CMMS. Additionally, Diablo must review the inventory of tools and equipment that require periodic calibration and establish a protocol or procedure consistent with the required calibration interval and to ensure that all tools and equipment are included in the calibration cycle and calibration records are maintained.



Figure 4: Calibration Certificate for Diablo’s infrared camera

Finding 6: Revisions and reviews of the Emergency Response Plan (ERP) must be tracked.

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

“The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company’s behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures.”

GO 167-C, Appendix D, OS 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:

b) Trains personnel in the emergency plan periodically;

c) Ensures provision of emergency information and materials to personnel;

Diablo must establish a practice of documenting when revisions and reviews are completed for process-controlled documentation, including the ERP and other health and safety related documentation. If an annual review is completed, and no revision is required, Diablo must document the review by logging that a review was conducted but no revisions were made. Diablo must document all reviews and revisions through a Management of Change (MOC) or similar process. After revisions are made, Diablo must communicate the revised document to all applicable employees. During ESRB’s audit, Diablo immediately implemented this practice by adding a table to the ERP to track revisions.

Finding 7: Safety-related incident reporting requirements for Generating Assets and Energy Storage Systems must be e Emergency Response Procedure.

GO 167-C, Appendix C, MS 16: Regulatory Requirements states:

“Regulatory compliance is paramount in the operation of the facility. Each regulatory event is properly identified, reported and appropriate action is taken to prevent recurrence.”

Diablo must add the California Public Utilities Commission’s safety-related incident reporting requirements for generating assets and energy storage systems to its ERP or relevant incident reporting procedure to ensure regulatory events are properly identified and reported. The addition must outline the reporting method and the criteria established in GO 167-C Section 9.4 Safety Related Incidents. Diablo completed this revision to the ERP during ESRB’s site visit.

II. Observations

Observation 1: Diablo is implementing an internally managed maintenance program.

GO 167-C, Appendix C, MS 2: Organizational Structure and Responsibilities states:

“The organization with responsibility and accountability for establishing and implementing a maintenance 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 and are clearly defined and commensurate with responsibilities.”

GO 167-C, Appendix C, MS 3: Maintenance Management and Leadership states:

“Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities.”

At the time of ESRB’s audit, Diablo confirmed that the site had not renewed its contract with the EPC Contractor, [REDACTED]. Diablo stated that all maintenance activities will be conducted or coordinated internally through contractors. Diablo provided ESRB with comprehensive documentation and an annual maintenance plan outlining scheduled inspection and maintenance activities for 2026. The plan included a detailed list of preventative maintenance task lists and inspections expected to be completed in each month of the year, grouping activities to minimize downtime. ESRB did not identify any deficiencies in the maintenance plans; however, this is the initial maintenance cycle under REV Renewable’s internal program, and it had not been executed at the time of ESRB’s audit. ESRB Inspectors were unable to verify the implementation and execution of the new maintenance program. This observation is included in the report to document that Diablo’s plans appear to be thorough and compliant with GO 167-C standards, but ESRB will verify the executed maintenance activities as part of follow-up actions. Diablo does not need to take any corrective actions for this observation at this time.

III. List of Documents Reviewed

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	Hazardous Material Communication Program and 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	Confined Space Entry Procedure
	17	Emergency Shutdown or Battery Discharge Protocol
	18	Plant Physical Security and Cyber Security Procedures and Records
	19	Job Safety Analysis Program**
Employee Training	20	Safety Training Records*
	21	Skill-related Training Records*
	22	Certifications for Electrical, Welders, Forklift & Crane Operators*
	23	Hazmat Training Records *
Contractors	24	Latest list of Qualified Contractors*
	25	Contractor Selection / Qualification Procedure
	26	Contractor Certification Records
	27	Contractor Monitoring Program
	28	BESS Maintenance Contract and Operations and Monitoring Contract

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)
O&M	34	Daily Round Sheets / Checklists
	35	Logbook**
	36	List of Open/Backlogged Work Orders*
	37	List of Closed/Retired Work Orders (last 2 years)*
	38	Open/Backlogged Contractor Issues or Tickets
	39	Work Order Management Procedure (last 3 revisions, if applicable)
	40	Computerized Maintenance Management System (Demonstration onsite)**
	41	SCADA system (Demonstration onsite)**
	42	All Root Cause Analyses (if any)
	43	Emergency Generator Test and Maintenance Records (last 5 years)
	44	Substation Battery Test and Maintenance Records (last 5 years)
	45	Maintenance and Inspection Records for Switchgear/breaker/relays
	46	Inspection and Maintenance Records for PCS (Inverter)
Battery Energy Storage System	47	BESS HVAC inspection and maintenance records
	48	Capacity Testing Records and Procedure
	49	Round Trip Efficiency Test Records and Procedure
	50	Thermal Management System Inspection Records
	51	Battery Management System 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)
	55	Hazard Mitigation Analysis
	56	Offsite Impacts Analysis
	57	Underwriters Laboratory 9540A Test Reports
	58	BESS Fire Suppression System Inspection, Maintenance, and Testing Records
	59	BESS Fire Suppression System as Built Drawings and Schematics
	60	Operations and Monitoring Setup of the BESS Fire Suppression System (Onsite Demonstration)**
	61	BESS Fire Suppression System Integration with Fire Alarm Panel Design Records or Manuals
	62	BESS Fire Suppression System Standard Operating Procedure or Control Room User Manual

Transformers	63	Medium Voltage Transformer Maintenance and Inspection Records
	64	Maintenance and Inspection Records for Main Transformer(s)
	65	Hot Spots / IR Inspection Reports
	66	Dissolved Gas Analysis Reports
Instrumentation	67	Instrument Calibration Procedures and Records
	68	Fire, Heat, Gas, and Smoke Detection Calibration and Test Records
Test Equipment	69	Calibration Procedures and Records
Documentation	70	Records of all system outages greater than 50 MWs and longer than 72 hours
	71	Record of Thermal Events
	72	Module or Rack level Electrical Schematics
	73	As-Built Construction Drawings including Single Line Diagram
	74	OEM BESS Data/Specification Sheet
	75	Vendor Manuals (BESS, BMS, Inverter)
Spare Parts	76	Spare Parts Inventory List
	77	Shelf-life Assessment Report
Management	78	Employee Performance Review Procedures and Verifications
	79	Organizational Chart
Internal Audit	80	Internal Audit Procedures and Records

* 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.