



Re: CPUC Audit Findings of High Winds Energy Center October 21-24, 2024
Audit Number GA2024-13HW
Due Date: January 24, 2025

Findings Requiring Corrective Action

Finding 1: The Plant failed to respond to California Public Utilities Commission (CPUC) Information Requests.

Response:

1. Injury and Illness Prevention Plan

- a. IIPP was provided to CPUC in follow-up data request. A new annual work order has been submitted and will be required to be reviewed at the same time as the Emergency Action Plan and Code Blue Books, which were also provided to CPUC during initial data request. IIPP will also be reviewed during initial employee onboarding and during quarterly Emergency Action Plan Drills. These Plans along with the Safety Management System's (SMS) documents provide an overarching level of safety guidance for the company and extend to all sites in all states.
- b. Review of IIPP was completed on 12/26/24. Ongoing annual review work order created.

2. Work Order Management Related Documents

- a. All required documentation was provided during follow-up data request. We will ensure any pre-visit data request documentation is provided in a timely manner.
- b. Completed 10/22/24.

3. Maintenance Procedures and Turbine Specific Design Information

- a. GE documentation is provided alongside this audit response. This turbine generator impedance form and spec sheet only applies to 1 tower on site (REDACTED). We will ensure any pre-visit data request documentation is provided in a timely manner. We have also included the NextEra standard PM plan for minor / major service scheduling in addition to the Vestas standards. This is used in conjunction with any other work orders and is factored into an assigned TCO value, as outlined in the response to Finding 2. The V80 PM Work 2024 document demonstrates all PMs that are completed in the maintenance rotation according to regularity.
- b. For the Vestas Wind Turbines operating at the Site: NEER will evaluate the relevance of the gaps found between the preventive maintenance program currently implemented at the Site and the generic original equipment manufacturer maintenance recommendations outlined in document number: (REDACTED)

NEER will determine if such gaps are indeed relevant to the specific equipment located at the Site and the best course of action to address them – 3/31/25.

- c. Due to the confidential nature of the OEM proprietary documentation for the GE 1.7. ESS, we are unable to provide the requested OEM Specification at this time. We have reached out to the OEM for permission to share such documentation under the condition that it be treated as a confidential treatment. In the interim, we have attached a GE1.7MW turbine spec sheet. Using GE OEM document in combination with the minor/major planning documents also submitted, NEER will evaluate the relevance of the gaps that may be found as a result and will determine if such gaps are indeed relevant to the specific equipment located at the Site and the best course of action to address them – 3/31/25.

Finding 2: The Plant requires improvements to its work order practices.

Response:

1. The Total Cost Optimization (TCO) approach considers several variables to present a daily value to present a daily value to work in Maximo (work management system). For preventative maintenance (PM) work orders, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] “ [REDACTED]
[REDACTED]
[REDACTED] It is important to note that site workorder count is not constrained. Thus, a site could have an unlimited number of open workorders at any given time. Nominal completed workorders relative to total open workorders is not considered an informative metric to review as the complexity/value/timing of many workorders can be minimal relative to their “count”. PM workorders are pre-populated up to [REDACTED] before their due date which can adversely affect the nominal count of open workorders relative to those completed (as well as other quarterly work such as environmental inspections). Active workorder management should be a consistent staple of the site, as committed to, before the summer of 2025.
2. Corrective action plan: Zero overdue backlog by 6/20/25 through an increase in travelling tech labor during March and April timeframes and outside service labor brought in during February and March timeframe to help support site goals.

Finding 3: The Plant had missing fire extinguishers and fire extinguishers that had not received monthly inspections.

Response:

1. ESRB observed that there was a missing fire extinguisher at the Montezuma Operations and Maintenance (O&M) Building. Safety equipment must be readily available at the identified

locations in the event of an emergency. The Plant placed a fire extinguisher at this location during the audit.

- a. Plant placed a fire extinguisher in this location during the audit as per the finding. Monthly fire extinguisher inspections are ongoing and currently in place via our work order tracking system.
 - b. Completed 10/24/24 and ongoing monthly.
2. Three fire extinguishers located in the High Winds Spare Parts Building had not been inspected in September, the month prior to ESRB's audit. These fire extinguishers were later inspected by the Plant during the audit.
 - a. Plant completed inspections on fire extinguishers with missing inspection in spare parts building. Monthly fire extinguisher inspections are ongoing and currently in place via our work order tracking system.
 - b. Completed 10/24/24 and ongoing monthly.

Finding 4: The Plant has missing or deteriorated National Fire Protection Association (NFPA) 704 Placards.

Response:

1. The NFPA 704 placard on the propane tank was faded. This sign should be replaced so that the colors on the sign are legible. Colors on the NFPA 704 placard help easily identify the hazards associated with the material, such as propane.
 - a. NFPA 704 Placard on the propane tank has been replaced.
 - b. Completed 1/10/25:



2. The flammable material storage cabinets at both the Montezuma and High Winds O&M Buildings did not have the appropriate NFPA 704 placards showing the fire hazard of the contents in the cabinet. The appropriate NFPA 704 placards must be located on the cabinets and the at the primary entrances of the buildings housing them.

- a. NFPA 704 placards were ordered and posted on all cabinets as per the audit. Pictures shown below.
- b. Completed 1/15/25.



Finding 5: Flammable material storage cabinets did not have fully functional self-closing mechanisms.

Response:

1. All flammable material storage cabinets have fully functional self-closing mechanisms installed. As per the audit report, repairs were made during audit period.
 - a. Completed 10/23/24.

Finding 6: Substation battery terminals were corroded.

Response:

1. The batteries are inspected / maintained at 4-month intervals as per NERC standards and are cleaned is found UNSAT. The provided procedure shows the DC Supply assessment and maintenance as required, which is conducted by High Voltage technicians on site.
2. Maintenance completed during audit as per the report, continuous 4-month inspections and maintenance ongoing as per the attached.

Finding 7: ESRB staff observed improper housekeeping across the Plant.

Response:

1. The noted spill kits have been placed in their proper places and are fully stocked, which were completed during the audit period. These spill kits are checked quarterly during SPCC inspections to ensure they are fully stocked and accessible.
2. SPCC Plan is reviewed every year in March and will be updated to include the locations of these kits. Estimated completion date: 3/31/25.

Finding 8: The Plant must replace deteriorating and missing signage in various places throughout the Plant.

Response:

1. [REDACTED] did not have an evacuation map posted. The Plant installed a new map during the audit.
 - a. Evacuation map was posted on [REDACTED] and verified during audit.
 - b. Completed 10/23/24.
2. At the High Winds O&M Building there were signs that were faded and tearing.
 - a. O&M signage noted during audit have been updated as per the audit. Corrected pictures included below.
 - b. Completed 1/10/25.