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

May 30, 2025

Aaron Hodges
Plant Manager
27200 Rice Road
Desert Center, CA 92239

SUBJECT: **Generation and Energy Storage Audit of IP Oberon I, LLC and IP Oberon II, LLC, Audit Number: GA2025-07OS**

Dear Mr. Hodges:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emmanuel Salas and Evan Coughran of ESRB staff conducted a generation and energy storage audit of IP Oberon I, LLC and IP Oberon II, LLC from March 24 through March 27, 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 June 27, 2025, by providing an electronic copy of all corrective actions and preventive measures taken and/or planned to be taken to resolve the violations.

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

Please submit your response to Emmanuel Salas at emmanuel.salas@cpuc.ca.gov. Please note that although IP Oberon I LLC and IP Oberon II, LLC 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 IP Oberon I LLC and IP Oberon II, LLC on the CPUC website. If you wish to make a claim of confidentiality covering any of the information in the report, you may submit a confidentiality request pursuant to Section 14.4 of GO 167-C, using the heading “General Order 167-C Confidentiality Claim" along with such redactions. The request and redacted version of the audit report should be sent to Emmanuel Salas with a copy to me and the GO-167 inbox GO167@cpuc.ca.gov by June 27, 2025.

Please note that ESRB will also post the IP Oberon I, LLC and IP Oberon II, LLC audit report response on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a redacted version of your audit response that can be posted on the CPUC website.

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SAN FRANCISCO, CA 94102-3298

Thank you for your courtesy and cooperation throughout the audit process. If you have any questions concerning this audit, please contact Emmanuel Salas at emmanuel.salas@cpuc.ca.gov or (916) 347-6415.

Sincerely,

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

Attachment: CPUC Generation and 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
IP OBERON I, LLC & IP OBERON II, LLC
MARCH 24 – MARCH 27, 2025

I. Findings Requiring Corrective Actions

Finding 1: Lack of clear communication process between Tesla and Oberon for owner-responsibility maintenance issues.

General Order (GO) 167-C, Appendix C, Maintenance Standard (MS) 4: Problem Resolution and Continuing Improvement states:

> *"The company values and fosters an environment of continuous improvement, timely and effective problem resolution, and problem prevention. This can be accomplished by applying industry best practices, lessons learned, and proven safety measures for the safety and reliability of both the GA and ESS."*

GO 167-C, Appendix C, MS 10: Work Management states:

> *"Work is identified and selected based on priority to maintaining reliable facility operation. Work is planned, scheduled, coordinated, controlled, and supported with resources for safe, timely, and effective completion."*

During the audit, Electric Safety and Reliability Branch (ESRB) inspectors noted that Oberon does not have a clear process in place to facilitate communication between Tesla, the maintenance service provider for the Battery Energy Storage System (BESS), and Oberon regarding maintenance issues identified by Tesla personnel during BESS maintenance and inspection activities, particularly those that fall under Oberon's responsibility to address. Without a defined and transparent method of communication between Tesla and Oberon regarding such issues, there is a risk that items requiring owner attention may go unaddressed or unresolved. This gap in issue handoff and resolution tracking may affect equipment reliability, safety, and overall operational oversight.

Oberon must establish a formal communication and tracking process between Oberon and Tesla to ensure that all BESS maintenance-related issues identified, specifically those requiring Energy Storage System Owner (ESSO) action, are properly documented, reviewed, and resolved. Oberon must submit this process documentation to ESRB for review and verification.

Finding 2: Lack of Physical Muster Point Signage at the Plant

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."*

ESRB inspectors observed that Oberon identified muster point locations for the BESS yards, substation, and Operations and Maintenance (O&M) building on site maps but did not physically mark these locations on the field.

Muster point signage is critical during emergency evacuations to ensure that all personnel can quickly and safely assemble at a designated safe location. Without visible, physical muster point signage, personnel may become confused during an emergency, delaying accountability efforts and increasing the risk to safety. Oberon must install clearly visible and durable signage at all designated muster point locations. Oberon must also submit photographic evidence of the installed signage to ESRB for review and verification.

Finding 3: Labeling issues in the Oberon 1 BESS yard satellite hazardous waste area.

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 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."*

During the site inspection, ESRB inspectors observed that the satellite hazardous waste accumulation area within the Oberon 1 BESS yard is not labeled in the field or identified on the site's map as a satellite accumulation area. As a result, the area is not clearly differentiated from the main hazardous waste accumulation area. Satellite and central accumulation areas are subject to different regulatory requirements, including differences in accumulation time limits and storage volume thresholds.

Additionally, ESRB inspectors observed an unlabeled container of coolant placed inside of the satellite hazardous waste pallet within the Oberon 1 BESS yard. The container did not include a label or any information identifying the chemical contents. All containers with chemicals must be properly labeled with the chemical name or composition, and an indication of the associated hazards. Failure to properly label hazardous waste containers increases the risk of improper handling, exposure, and delayed emergency response in the event of a spill or incident.

Oberon must clearly identify the satellite hazardous waste accumulation area in the field and ensure that it is labeled accordingly on all applicable site documentation, including site maps. Additionally, Oberon must ensure that the unlabeled container is immediately labeled with all required information and must submit photographic documentation of the corrective action to ESRB for review and verification.

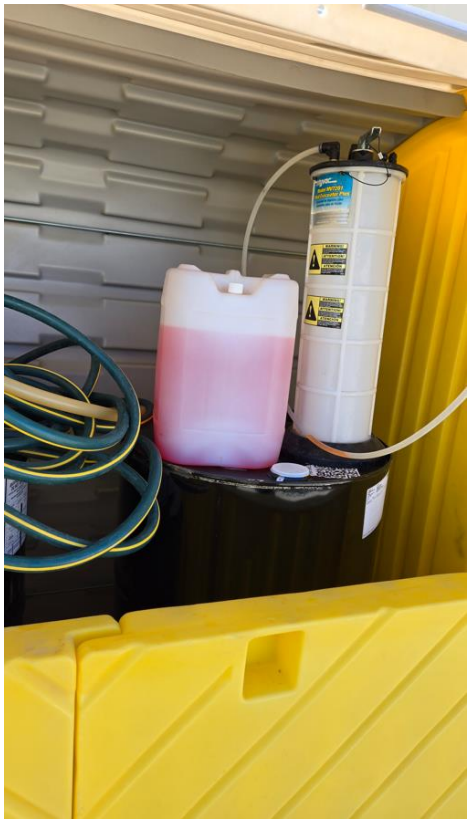

Figure 1: Unlabeled chemical container.

Finding 4: Company issued vehicles are not adequately equipped with Automated External Defibrillator's (AED).

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

> *"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."*

GO 167-C, Appendix E, 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."*

ESRB inspected Oberon's company issued vehicles and found that Oberon did not equip them with AEDs. According to Section 3.4.5 of the *Emergency Response Plan* and Section 21.2.1 of the *Environmental Health & Safety Manual*, Oberon shall keep AEDs in manned office buildings and in each field worker's company issued vehicles. Oberon must equip all company-issued field vehicles with AEDs and ensure that all work vehicles are consistently outfitted with the required safety equipment. Oberon must provide photographic documentation confirming that all company-issued vehicles have been equipped with AEDs for ESRB to review.

Finding 5: Oberon 1 and 2 BESS yards and substation gates are missing National Fire Protection Association (NFPA) 704 Placards.

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."*

During the site inspection, ESRB inspectors observed that Oberon did not post NFPA hazard diamond placards on the front gates of the Oberon 1 and 2 BESS yards or the substation. The absence of these placards represents a potential safety and emergency response concern, as NFPA hazard diamonds provide critical information to first responders regarding flammability, health, and reactivity hazards present on-site. Without proper hazard identification signage, emergency

personnel may lack the necessary information to respond safely and effectively in the event of an incident.

Oberon must review all Safety Data Sheets (SDS) and label the front gates of the BESS yards and the substation with NFPA 704 placards reflecting the maximum hazard ratings contributed by the chemicals present in each area. Oberon must submit photographic documentation of the installed NFPA 704 placards to ESRB for review and verification

Figure 2: Substation gates missing an NFPA hazard placard.

Figure 3: Oberon 1 BESS yard gates missing an NFPA hazard placard.

<u>Finding 6: ESRB inspectors observed a flammable material storage cabinet without a self-closing mechanism.</u>

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

> *"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as*

the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

GO 167-C, Appendix D, OS 11: Operations Facilities, Tools, and Equipment states:

"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage. Physical separation such as, but not limited to, egress requirements, clearance for electrical equipment, and ESS equipment shall be maintained."

NFPA 1 60.1.2.23 (d) states:

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

During the site inspection, ESRB inspectors observed that a flammable storage cabinet located in the Oberon 1 BESS yard does not have an automatic self-closing mechanism installed on the door. Flammable storage cabinets must be equipped with self-closing doors to minimize fire propagation risk.

Although the cabinet belongs to Tesla personnel, Oberon is responsible for ensuring that all equipment within their site complies with applicable safety requirements. Oberon must ensure that all flammable material storage cabinets on site are fitted with self-closing mechanisms and are in proper operating condition. Oberon must submit photographic documentation of the corrective action to ESRB for review and verification.

Figure 4: Flammable material storage cabinet without a self-closing mechanism.

Finding 7: ESRB inspectors observed that Oberon has not been conducting monthly ladder inspections.

GO 167-C, Appendix E, 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 E, 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 noted that Oberon has no inspection records for their ladders on site. According to Oberon's orientation program, all ladders must have monthly documented ladder inspections to ensure they are in proper working condition for Plant staff. Oberon staff must follow the procedures they have in place including monthly ladder inspections.

Finding 8: ESRB inspectors noted cracked and damaged solar panels.

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 4: Problem Resolution and Continuing Improvement states:

> *"The company values and fosters an environment of continuous improvement, timely and effective problem resolution, and problem prevention. This can be accomplished by applying industry best practices, lessons learned, and proven safety measures for the safety and reliability of both the GA and ESS."*

During the site inspection, ESRB inspectors observed multiple solar photovoltaic (PV) panels across the site exhibiting physical damage. Typical damage included long branching cracks across the rear and front side of the modules, localized burn marks, and in some cases, visible charring or discoloration consistent with thermal degradation. The nature and pattern of the damage suggest possible electrical issues and may also indicate manufacturing defects.

Cracked or thermally compromised panels present operational concerns, including degraded energy production, and potential for further equipment failure if left unaddressed. The presence of similar damage across multiple panels indicates a recurring issue that requires investigation.

Oberon must closely monitor the affected panels and develop a written plan of action that outlines the steps being taken to investigate the cause of the damage. The plan must include a timeline for requesting a formal Root Cause Analysis (RCA) from the manufacturer and must describe how findings will be tracked and resolved. Oberon must submit the action plan to ESRB for review and verification.

Figure 5: Damaged solar PV panel.

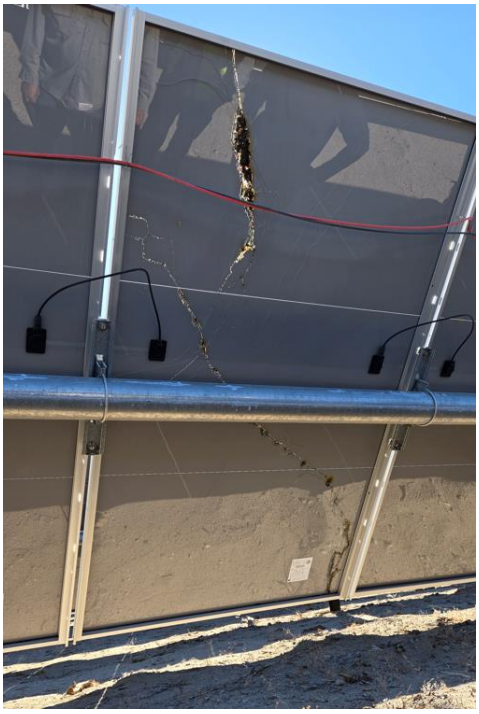

Figure 6: Damaged solar PV panel.

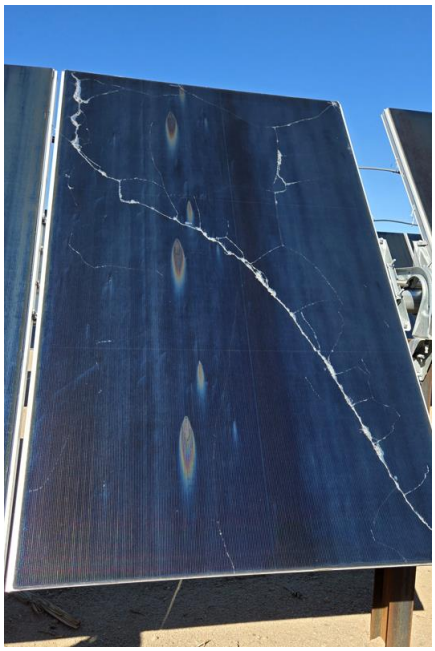

Figure 7: Damaged solar PV panel.

Finding 9: Calibration Inventory List Incomplete and Missing Current Calibration Dates

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 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."*

During the documentation review, ESRB inspectors observed that Oberon's calibration inventory list, which is intended to identify all on-site equipment requiring periodic calibration, was outdated. The list lacked current calibration dates for several items and did not include all applicable equipment subject to calibration requirements. Maintaining a complete and up-to-date calibration inventory is essential to ensure equipment accuracy, support quality control, and enable effective scheduling of calibration activities. Oberon must revise the calibration inventory list to ensure it includes all site equipment requiring calibration and that each entry reflects the most recent calibration date and next due date. Oberon must submit the updated list to ESRB for review and verification.

Finding 10: Oberon is not properly reviewing inspection and testing results.

GO 167-C, Appendix D, MS 4: Problem Resolution and Continuing Improvement states**:**

"The company values and fosters an environment of continuous improvement and timely and effective problem resolution."

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

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

GO 167-C, Appendix E, OS 4: Problem Resolution and Continuing Improvement states:

"The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution."

GO 167-C, Appendix E, 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 reviewed Oberon's substation generator step-up transformer oil analysis test results and noted that the report identified the oil's liquid power factor to be outside of the acceptable range, which Oberon did not address. Oberon staff explained that they did not forward the test results to their engineering team due to the absence of a recommendation for immediate retesting. However, all abnormal test results, regardless of whether immediate retesting is advised, must be reviewed and evaluated by the appropriate personnel to determine whether corrective action is needed.

ESRB staff also reviewed Oberon's technical rounds sheet and found that Oberon did not address or enter issues noted in the technical round sheets into their work order management system. Oberon must ensure that all observations requiring action that are documented during technical rounds, as well as findings from inspections and tests, are reviewed, appropriately logged in the work management system, and addressed in a timely manner.

Finding 11: Work incorrectly labeled in Oberon's work management system.

GO 167-C, Appendix D, MS 4: Problem Resolution and Continuing Improvement states**:**

"The company values and fosters an environment of continuous improvement and timely and effective problem resolution."

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

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

GO 167-C, Appendix E, OS 4: Problem Resolution and Continuing Improvement states:

"The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution."

GO 167-C, Appendix E, 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."*

During the documentation review, ESRB inspectors identified that Oberon staff entered work incorrectly in the work order management system, including mislabeled work type classification. Accuracy in the work order management system is critical to ensure Plant staff can quickly identify the type of work performed and to allow technicians to address issues in a timely and organized manner.

Oberon must utilize its work tracking software effectively by ensuring that all preventative and corrective maintenance activities are properly categorized based on the actual work performed. Oberon management must ensure that all work is accurately recorded and documented in the system.

Finding 12: Oberon requires improvements to its documentation control practices.

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

> *"Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation."*

GO 167-C, Appendix E, OS 4: Problem Resolution and Continuing Improvement states:

> *"The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution."*

GO 167-C, Appendix E, 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."*

During the review of Oberon records, ESRB inspectors observed that Oberon staff did not upload or log vehicle inspection documentation into the work order management system. At the time of the audit, no vehicle inspection records from 2025 were stored in the system. ESRB inspectors also found that Oberon staff did not retain completed vehicle inspection sheets in the physical binder used to store these records, with multiple inspections missing at the time of the audit.

Oberon staff must ensure that all inspection documentation is consistently completed, collected, and stored in both physical and digital formats to maintain accurate records.

Finding 13: Annual maintenance plan has inconsistent maintenance and inspection intervals differing from procedures.

GO 167-C, Appendix D, MS 4: Problem Resolution and Continuing Improvement states**:**

"The company values and fosters an environment of continuous improvement and timely and effective problem resolution."

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

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

GO 167-C, Appendix E, OS 4: Problem Resolution and Continuing Improvement states:

"The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution."

GO 167-C, Appendix E, 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 the maintenance and inspection matrix used includes interval frequencies that are inconsistent with Oberon's procedures. Oberon must ensure that they are conducting inspections and maintenance activities at proper intervals. Oberon must review and update their procedures and preventative maintenance matrix to match the correct maintenance and inspection intervals prescribed by equipment manufacturers and the Oberon engineering support team. Oberon must submit any updated procedure and the updated matrix to ESRB for review once updates have been made.

II. List of Documents Reviewed

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 and 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
BESS	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	Training and Emergency Drills with Local First Responders Records
	59	Failure Modes and Effects Analysis (FMEA) or Hazard Analysis
	60	Operations Procedure
	61	Thermal Imaging and Hotspot Detection Reports

Documents	62	P&IDs*
	63	Vendor Manuals*
	64	Solar Farm Equipment Design Data
	65	Procedure Compliance Policy
Spare Parts	66	Spare Parts Inventory List
	67	Shelf-life Assessment Report
Management	68	Organizational Chart
Instrumentation	69	Instrument Calibration Procedures and Records
Test Equipment	70	Measuring & Testing Equipment List
	71	Test Equipment Calibration Procedures and Records
Internal Audit	72	Internal Audit Procedures and all Records

Note: If the 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.