

RESPONSE TO THE CPUC AUDIT FINDINGS

DIABLO ENERGY STORAGE FACILITY
NOVEMBER 3 – NOVEMBER 6, 2025
(AUDIT NUMBER ESS2025-05DB)

Public Redacted Version
Response to CPUC Audit Findings

Table of Contents

1) Introduction	3
2) Response to Findings	4
1) Attachment Finding 1	12
2) Attachment Finding 2	13
3) Attachment Finding 3	15
4) Attachment Finding 4	18
5) Attachment Finding 5	20
6) Attachment Finding 6	22
7) Attachment Finding 7	23

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Response to CPUC Audit Findings

1) Introduction

Diablo Energy Storage, LLC (“Diablo”) appreciates the opportunity to respond to the California Public Utilities Commission (“CPUC”) Audit Findings of Diablo Energy Storage Facility November 3–November 6, 2025 (“Audit Report”). The Audit Report addresses Diablo’s compliance with General Order 167-C (“GO-167-C”), including related Operation, Maintenance, and Logging Standards. The Audit Report presents “Findings” from the audit conducted by the Commission’s Electric Safety and Reliability Branch (“ESRB”) on November 3 through November 6, 2025 (“Audit”). Diablo responded to numerous information and data requests from ESRB and provided documentation and on-site support during the audit.

The Audit Report contains 7 Findings, which allege potential violations of GO-167-C requiring corrective action. Diablo completed full compliance with GO-167-C and notified the CPUC of compliance with the Logging Standard, Operations Standard, and Maintenance Standard effective September 9, 2025.

Diablo has taken appropriate action to address the issues identified in the Audit Report. Diablo has closed all 7 Findings. None of the purported issues identified in the Findings posed a significant risk to safety or reliability of the Site.

During the course of the audit, the ESRB team identified several exemplary practices implemented at Diablo. At present, the ESRB does not have an established process or mechanism for disseminating these best practices to the broader industry. To enhance industry standards and advance the objectives of GO-167-C, Diablo respectfully recommends that the ESRB consider developing a formal program dedicated to sharing best practices observed during audits. Such a program would provide valuable insights and support continuous improvement across all industry participants.

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Response to CPUC Audit Findings

2) Response to Findings

a) **Finding 1:**

- i) *Diablo Energy Storage's primary maintenance, and Engineering, Procurement, and Construction (EPC) contractor, failed to follow prudent maintenance standards and documentation protocol.*
- ii) Diablo response to Finding 1:
 - (1) Diablo utilizes Smartsheet as a shared Warranty Tracker for all warranty claims submitted to [REDACTED]. All warranty claims on the tracker have an associated work order in the Diablo Computerized Maintenance Management System (CMMS) system. All closure records are added to the CMMS for retention.
 - (2) Diablo meets weekly with [REDACTED] to update high-priority warranty claims, review closure plans based on claim analysis and repair strategy and verify all open claims using the warranty tracker. All actions from the weekly meeting are tracked in the Significant Action Items Document.
 - (3) Diablo is tracking all open [REDACTED] items with closure plan, including the responsible party and estimated completion date
- iii) Attachment Finding 1 find evidence of Diablo tracking [REDACTED] open items.
- iv) Status: **Complete – 4/1/2026**

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Response to CPUC Audit Findings

b) Finding 2:

- i) *Communication of evacuation routes and the evacuation procedures must be improved.*
- ii) Diablo response to Finding 2:
 - (1) Diablo has posted site maps with evacuation routes and safety equipment locations on the east and west office trailer doors
 - (2) Contractor and visitor orientations were updated to include muster point locations as well as instructions on how to exit the site in the event power is lost.
 - (3) The site team has also been provided with the required keys and training to override the gate controller in the event of an emergency.
 - (4) Diablo has budgeted for the installation of crash doors in the east and west wall to allow for secondary egress in the event of an emergency. Estimated install date 3rd quarter, 2026.
- iii) Attachment Finding 2 find evidence of updated evacuation map, pictures of evacuation maps posted on exit doors, updated visitor orientation slide, and updated contractor orientation slide.
- iv) Status: **Complete – 11/28/2025**

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Response to CPUC Audit Findings

c) **Finding 3:**

- i) *CMMS preventive maintenance (PM) inspections task lists are not being completed.*
- ii) Diablo response to Finding 3:
 - (1) Diablo updated the site's CMMS to ensure that all task fields must be filled out before the CMMS program will allow a PM to be marked closed. This software update will prevent PM closure prior to all task data being entered.
 - (2) To ensure all PM deficiencies are captured and corrected Diablo updated the site CMMS to auto create a corrective WO for any PM tasks marked as deficient.
 - (3) Diablo trained all Technician on the expectations to closing any work order.
- iii) Attachment Finding 3 find evidence of CMMS task completion requirement, CMMS automatic work order generation on failed task, and work order training tracker.
- iv) Status: **Complete – 12/9/2025**

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Response to CPUC Audit Findings

d) **Finding 4:**

- i) *Spill Prevention Control and Countermeasure (SPCC) inspections must be more specific.*
- ii) Diablo response to Finding 4:
 - (1) Upon review of Diablo's SPCC regulatory requirements, it was determined that a documented inspection plan is not necessary for the site. Accordingly, Appendices D and E have been removed from the Diablo SPCC.
 - (2) Although regulatory compliance does not mandate it, Diablo has added transformer containment inspections to the general site equipment checks conducted during site rounds.
 - (3) Diablo completed training of site team on secondary containment inspection and trained staff on how to identify the presence of oil in water or other debris of concern.
- iii) Attachment Finding 4 find evidence of employee training on secondary containment inspection and identification of oil in water.
- iv) Status: **Complete – 1/30/2026**

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Response to CPUC Audit Findings

e) **Finding 5:**

- i) *Diablo's infrared camera exceeds the required calibration interval.*
- ii) Diablo response to Finding 5:
 - (1) Diablo incorporated the Flir Camera into the test equipment calibration procedure, DES-MP-103, and completed its calibration.
 - (2) Diablo reviewed tool inventory and equipment and did not find any additional tools or equipment that was not already listed on the test equipment calibration procedure.
- iii) Attachment Finding 5 find evidence of Flir IR Camera calibration report and DES-MP-103 list of test equipment.
- iv) Status: **Complete – 12/26/2025**

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Response to CPUC Audit Findings

f) **Finding 6:**

- i) *Revisions and reviews of the Emergency Response Plan (ERP) must be tracked.*
- ii) Diablo response to Finding 6:
 - (1) Diablo revised DES-SAP-401 – Emergency Response Plans with a procedure revision log and requires adherence to REV-AM-109 BESS Procedural Control for all procedures.
 - (2) Diablo updated the newly added procedure revision log to document all past revisions to the ERP.
- iii) Attachment Finding 6 find evidence of the procedure revision log
- iv) Status: **Complete – 11/7/2025**

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Response to CPUC Audit Findings

g) **Finding 7:**

- i) *Safety-related incident reporting requirements for Generating Assets and Energy Storage Systems must be Emergency Response Procedure.*
- ii) Diablo response to Finding 7:
 - (1) During the audit Diablo updated DES-SAP-401 – Emergency Response Plans to include the CPUC safety-related incident reporting requirements.
- iii) Attachment Finding 7 find evidence of Section 12 of the Diablo Emergency Response Plan.
- iv) Status: **Complete – 11/7/2025**

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Appendix A – Corrective Action Plan

Action Item Tracking - November 2025 CPUC GO-167-C Audit

Findings #	CPUC Audit Findings	Action Taken to Close Finding	Date Closed	Status
1	EPC Warranty Item Tracking	1a U	3/16/2026	Completed
		2a C	4/1/2026	Completed
2	Contractor Site orientation modification to include contractor exit in the event of power loss	2a U	11/17/2025	Completed
		2b S	11/12/2025	Completed
		2c F	11/28/2025	Completed
		2d E	11/17/2025	Completed
3	CMMS- Verify PM steps are marked complete for each task	3a E	12/9/2025	Completed
		3b E	12/9/2025	Completed
		3c T	11/17/2025	Completed
4	SPCC Inspection Procedures include in plan (App D) and include in eLogger	4a E	12/1/2025	Completed
		4b J	11/20/2025	Completed
		4c J	11/20/2025	Completed
		4d C	11/20/2025	Completed
		4e J	11/20/2025	Completed
		4f C	1/30/2026	Completed
5	Flir IR camera out of calibration period and not listed in the procedure	5a S	12/26/2025	Completed
		5b J	11/14/2025	Completed
6	Memorandum of Change in the ERP	6a I	11/7/2025	Completed
7	Include GO167c Notifications in ERP	7a J	11/7/2025	Completed

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Response to CPUC Audit Findings

1) Attachment Finding 1

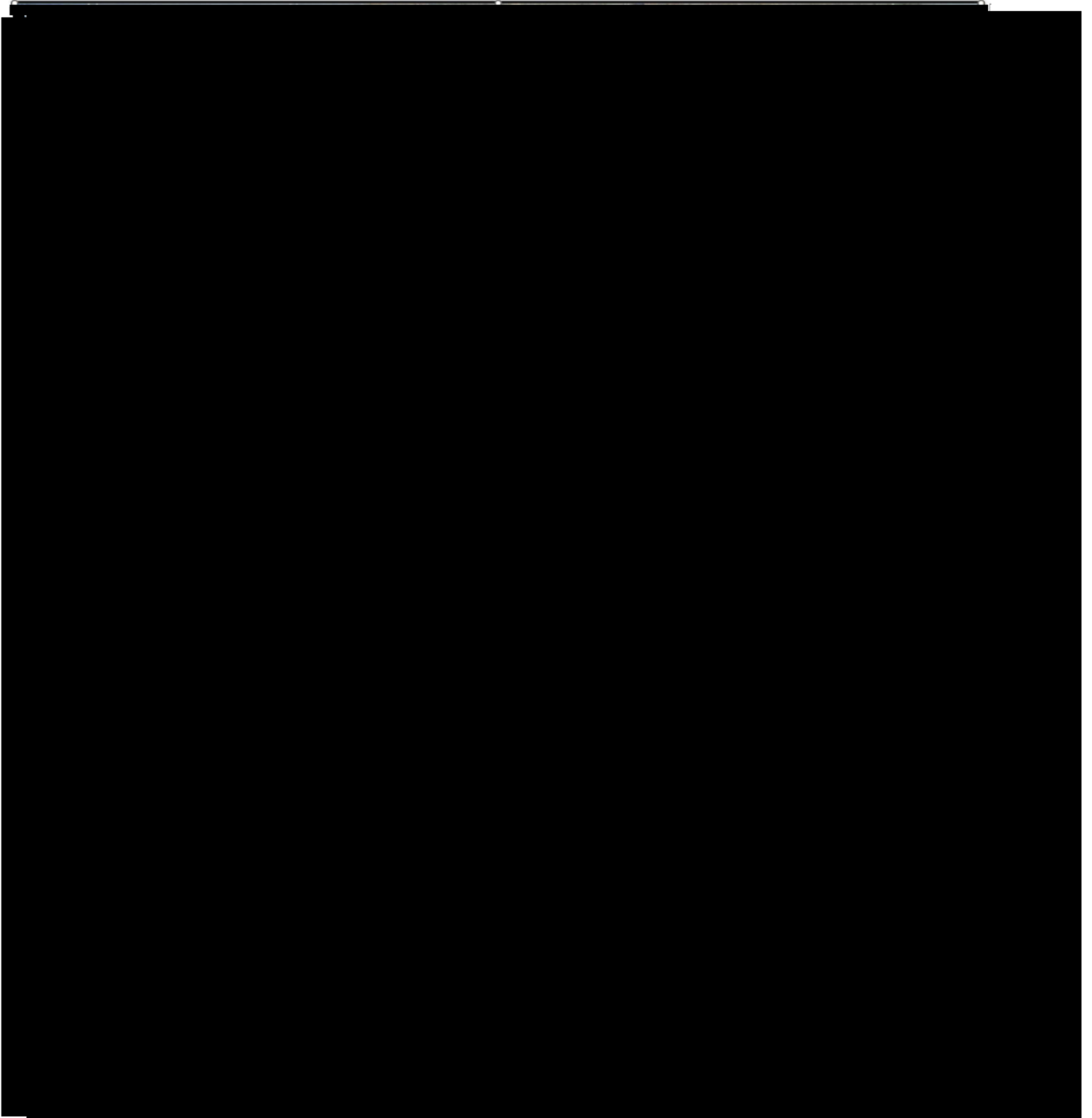
Diablo Tracker – [REDACTED] Open Items

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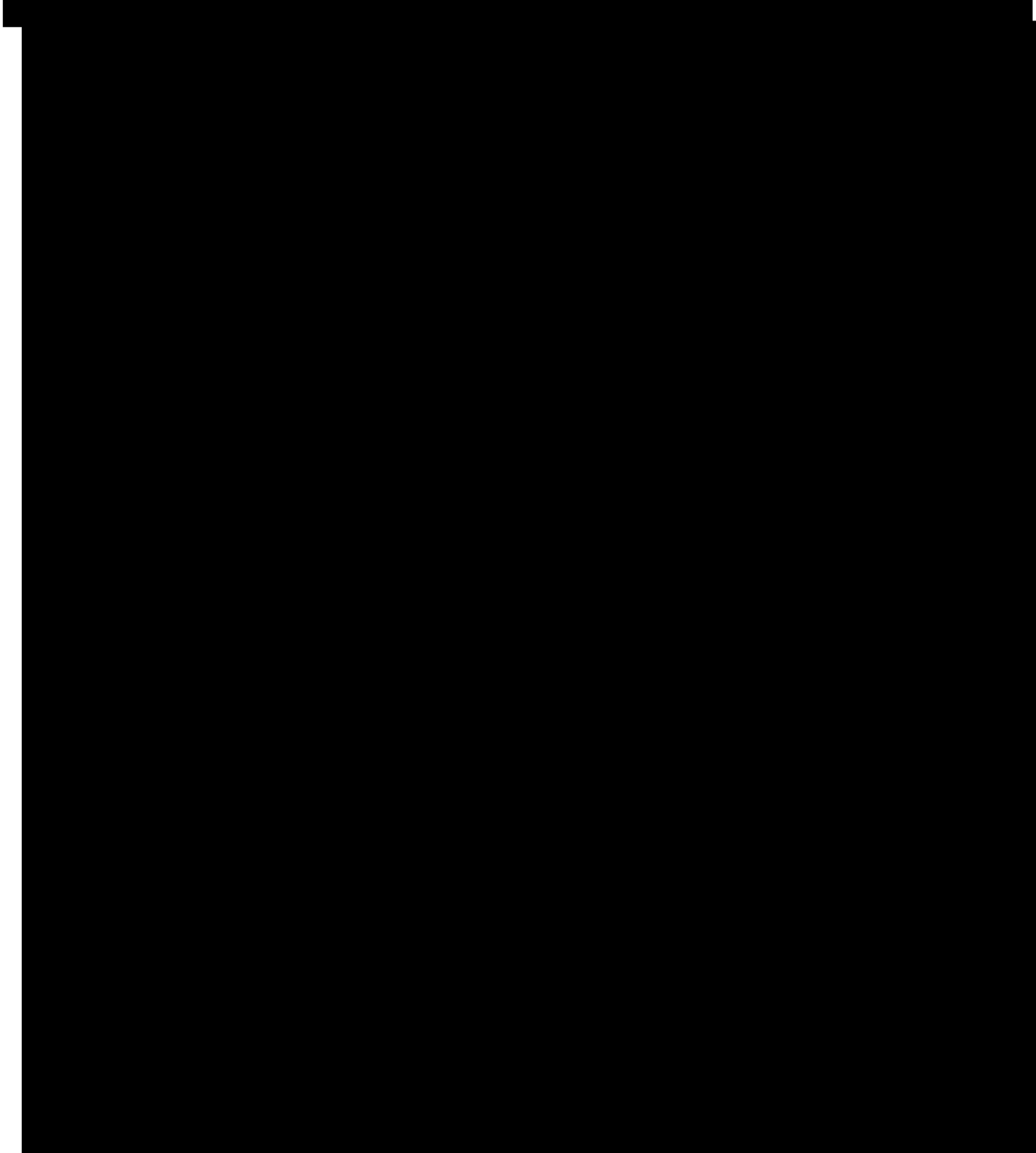
2) Attachment Finding 2

Site Evacuation Map



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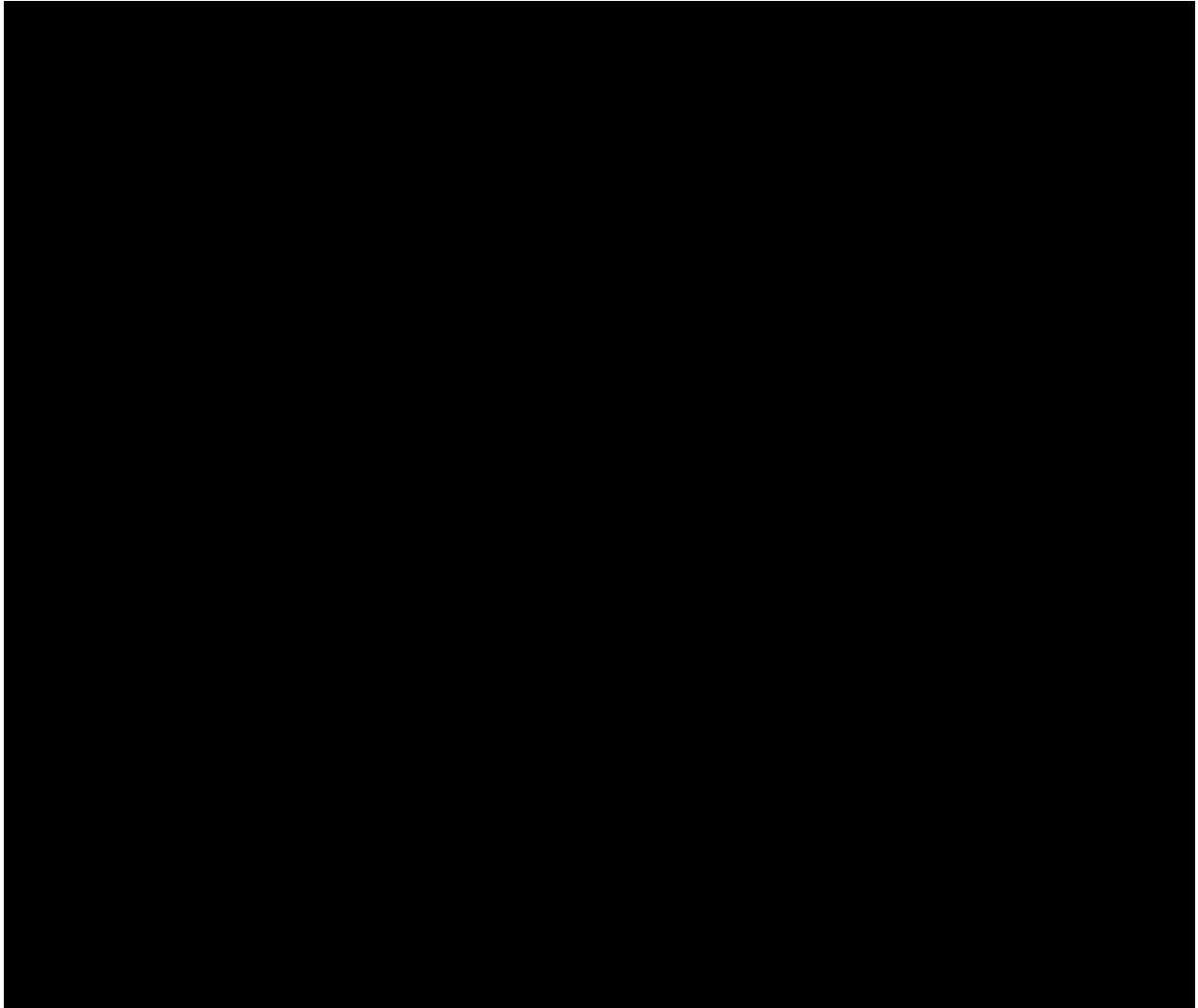
Contractor Orientation



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Response to CPUC Audit Findings

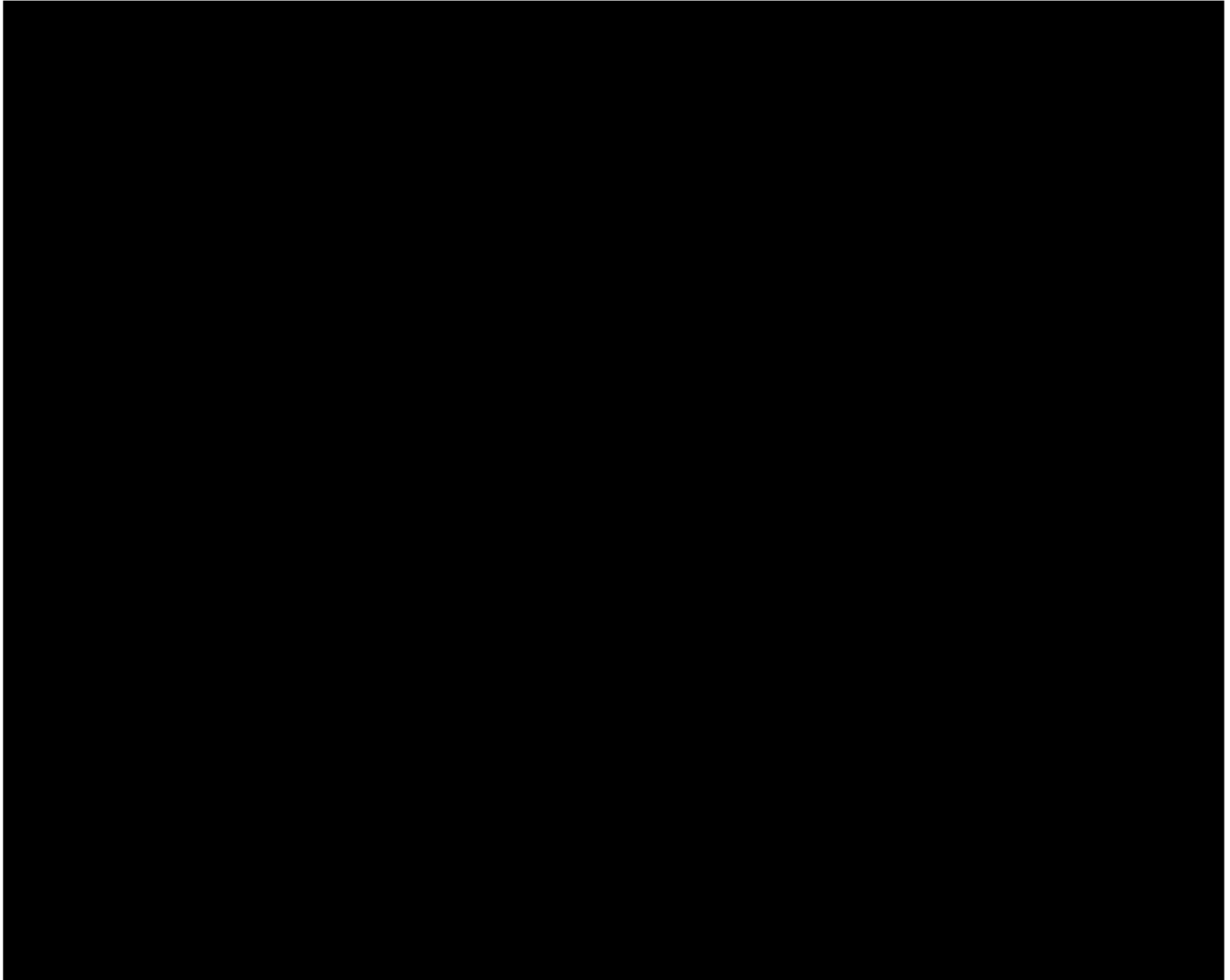
3) Attachment Finding 3

Task completion requirement



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CMMS automatic WO generation on failed Task



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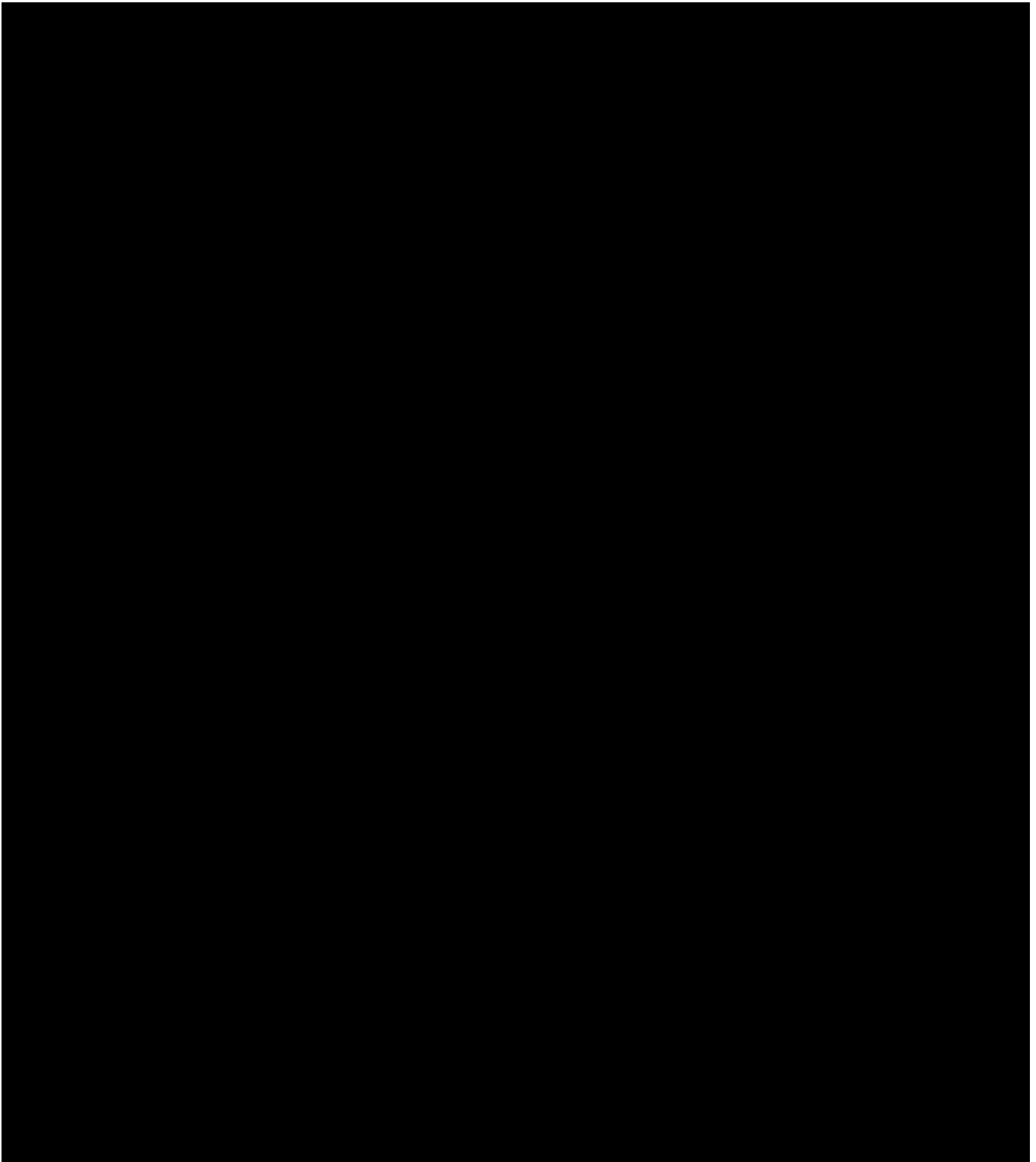
Work Order Training Tracker



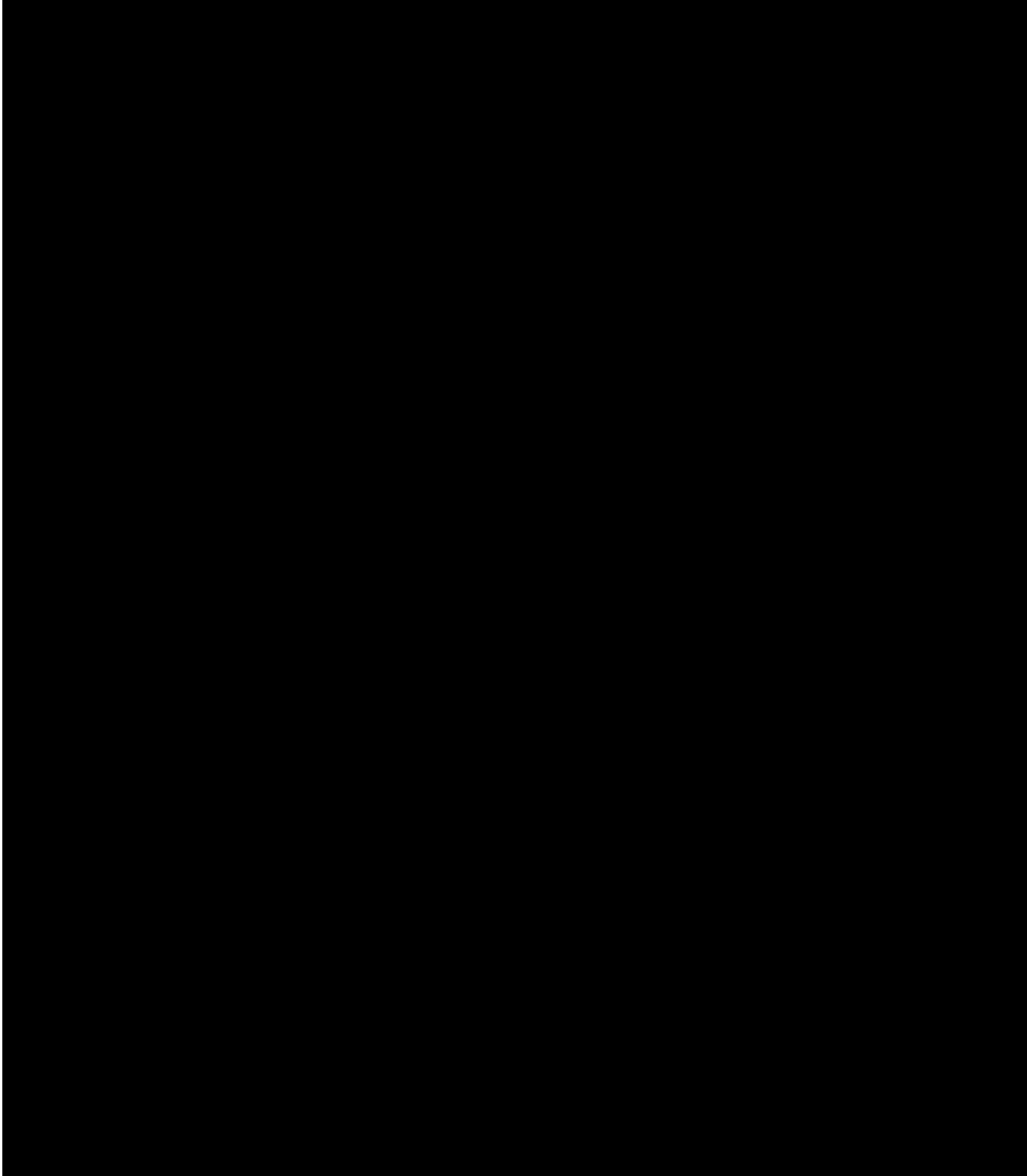
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4) Attachment Finding 4

Secondary Containment Training



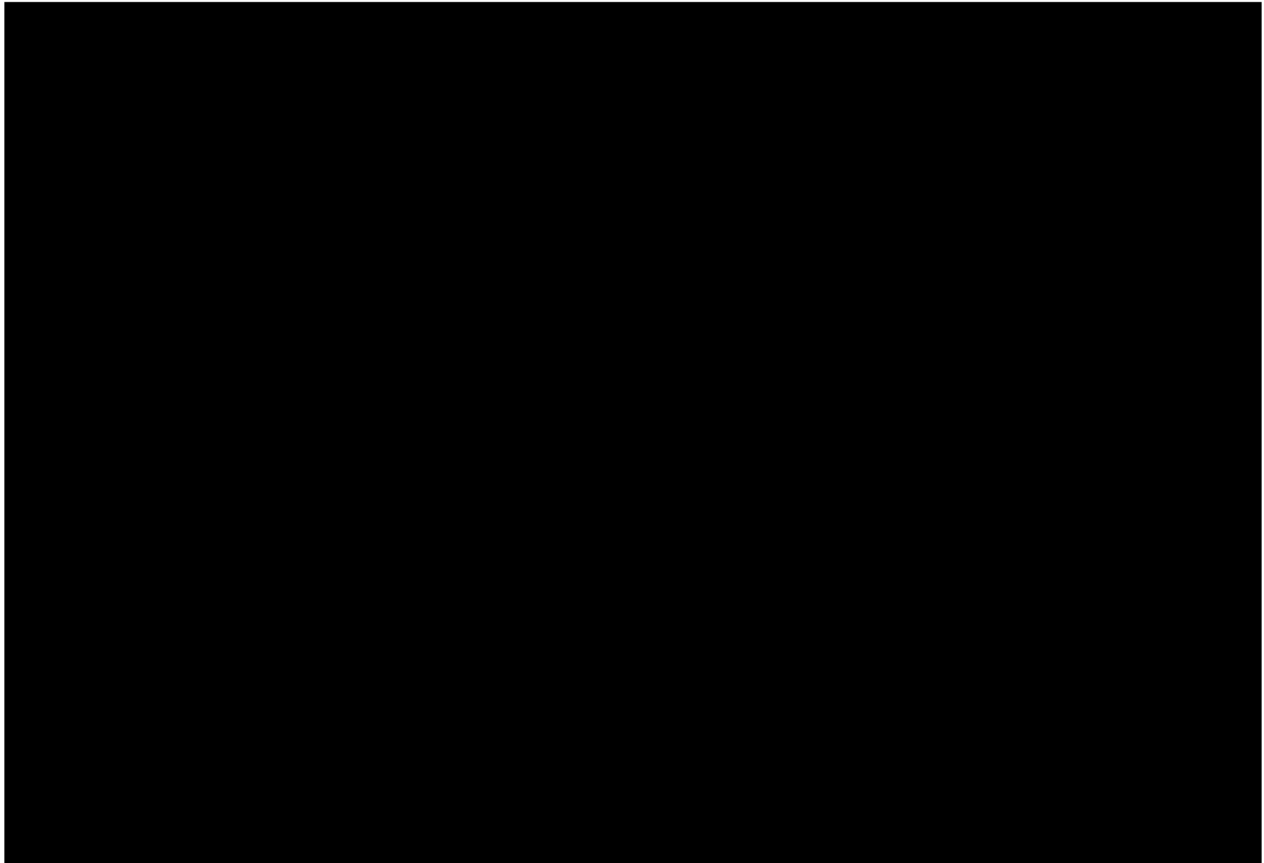
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Response to CPUC Audit Findings



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Response to CPUC Audit Findings

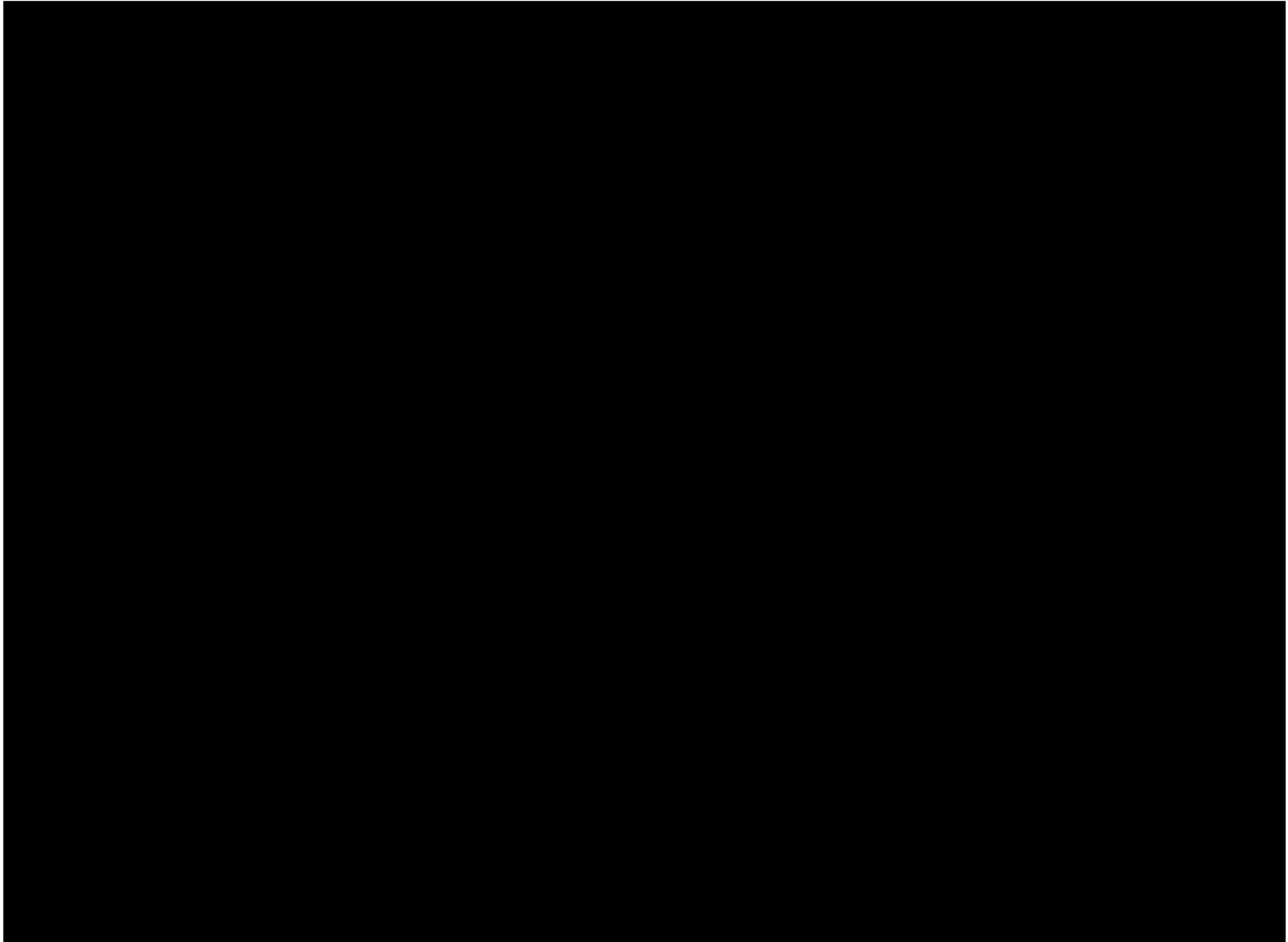
5) Attachment Finding 5

Flir IR Camera Calibration Report



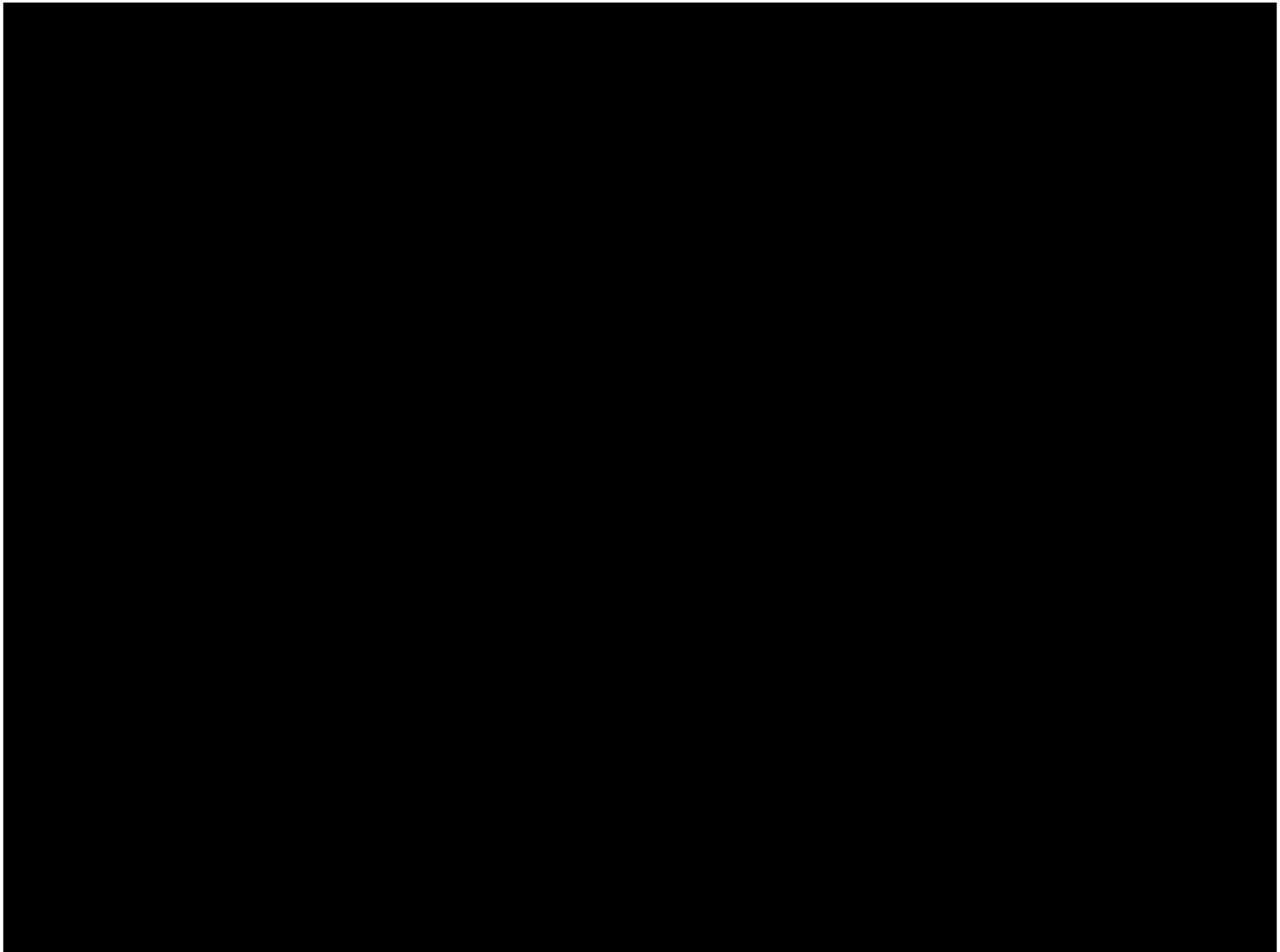
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DES-MP-103 – List of Test Equipment



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6) Attachment Finding 6
Procedure Revision Log



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Response to CPUC Audit Findings

7) Attachment Finding 7

Section 12 of Diablo ERP

