RESPONSE TO THE CPUC AUDIT FINDINGS

GATEWAY ENERGY STORAGE FACILITY
JUNE 2 – JUNE 5, 2025
(AUDIT NUMBER ESS2025-01GW)

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1) Introduction[1]

Gateway Energy Storage, LLC ("Gateway")[1] appreciates the opportunity to respond to the California Public Utilities Commission ("CPUC") Audit Findings of Gateway Energy Storage Facility June 2–June 5, 2025 ("Audit Report"). The Audit Report addresses Gateway'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 June 2 through June 5, 2025 ("Audit"). Gateway responded to numerous information and data requests from ESRB and provided documentation and on-site support during the audit.

The Audit Report contains 16 Findings, which allege potential violations of GO-167-C requiring corrective action. Gateway notes that GO-167-C was only recently approved by the CPUC and Gateway was not required to certify compliance with GO-167-C at the time of the audit. Gateway 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.

Gateway has taken appropriate action to address the issues identified in the Audit Report. Gateway has closed 14 of the 16 Findings and is tracking to close the remaining two Findings by the end of October. None of the purported issues identified in the Findings pose a significant risk to safety or reliability.

[1] Gateway's participation in this GO 167 audit is purely voluntary and Gateway expressly reserves all rights to assert any privilege or objection to additional requests for information. Gateway also expressly reserves all rights to challenge the legality and applicability of California Public Utilities Code Section 761.3 and the implementation of such statue by the Commission or any other agency or instrumentality of the State of California

2) Response to Findings

a) **Finding 1**:

i) *Gateway Energy Storage (Gateway) has not conducted an Arc Flash analysis for Gateway 1 and substation equipment since 2020*.

ii) Gateway response to Finding 1:

(1) Gateway has contracted with [redacted] to perform the five-year review of the Arc Flash analysis at Gateway 1 and the Gateway substation. A purchase order was issued for this work scope to [redacted]. The revised report is expected to be received before December 31, 2025.

(2) Gateway has created a work order in the site CMMS that will generate and provide a reminder to have the incident energy analysis reviewed for accuracy at intervals of 5 years.

(3) Upon [redacted] completion of the Arc Flash review:

(a) Gateway will submit the updated Arc Flash analysis to Electric Safety, and Reliability Branch (ESRB).

(b) Gateway will update all Arc Flash equipment labels at Gateway 1 and substation.

iii) Status: Open – tracking to close by 12/31/2025

b) **Finding 2**:

i) Gateway must ensure that all agreed-upon updates from the evacuation drill critique are incorporated into the Emergency Response Plan (ERP).

ii) Gateway response to Finding 2:

(1) In September 2024 Emergency Response Plan drill critique a suggestion was made by a local agency to include the square footage of the battery storage buildings in the emergency response plan.

(2) Gateway had a discussion on this matter with local Fire Department officials to determine if the recommendation made during the critique was still applicable. The Fire Department confirmed the request was still valid and requested the building square footage be added to Appendix 2 "Quick Reference Guide" of the site Emergency Response Plan.

(3) The building square footage was included within revision 5 of the Gateway Emergency Response Plan quick reference guide.

iii) Attachment Finding 2 find The Quick Reference Guide (Appendix 2) from the Gateway Emergency Response Plan.

iv) Status: Closed – 09/04/2025

c) **Finding 3**:
   i) *Lack of documented plan to address insurance recommendation for roof vent fusible link replacement*.
   ii) Gateway response to Finding 3:
      (1) [redacted] Insurance 2022 Property Inspection report recommendation [redacted] advised replacing fused links in rooftop mounted vents with [redacted] rated links.
      (2) The purpose of the fuse link is to ensure that the smoke and heat removal vent does not open before the activation of the fire sprinkler system. If the vent opened before a sufficient number of sprinklers activate, then a delay in sprinkler activation may occur.
      (3) Gateway contracted [redacted] to review the insurance recommendation.
         (a) Building code used for permitting Gateway first five buildings:
            (i) 2016 Edition of the California Building Code (CBC)
            (ii) 2016 Edition of the California Fire Code (CFC)
         (b) Gateway met both CBC and CFC at time of construction.
         (c) 2016 edition of CBC Section 910 or NFPA 13 Section 12.1.1.1 only note that the roof vents are required to have a higher temperature rating than the automatic sprinklers.
         (d) NFPA 204 appendix Section A11.1 notes that where smoke and heat vents with automatic activation are provided in a building protected by an automatic sprinkler system the activation temperature should be a minimum of 70F greater than the sprinkler activation temperature.
            (i) Gateway installed fuse link rating: [redacted]
            (ii) Gateway sprinkler head rating: [redacted]
            (iii) Fuse link rating is [redacted] higher than sprinkler head rating.
         (e) The 2022 edition of CBC Section 910.3.5 does provide a rating of 360F for the fusible link. Gateway1 was not subject to 2022 edition of CBC
         (f) Gateway 1 fully meets the requirements at the time of construction.
         (g) Gateway does not intend to implement the [redacted] Insurance recommendation [redacted] and considers this item to be closed.
   iii) Status: Closed – 9/22/2025

d) **Finding 4**:
   i) *Gateway must align the fire response procedures across its emergency response documents to ensure consistency*.
   ii) Gateway response to Finding 4:
      (1) Gateway Plant Operating Procedure [redacted] "Operational Emergency Response" provides guidance on operator action that should be taken for plant operational issues, such as HVAC trip, Inverter trip, Telemetry issues, black plant, etc.
      (2) At the time of the audit [redacted] contained a section that provided immediate action should an operator discover any type of fire at the plant site. These actions corresponded with the actions as outlined in the Site Emergency Response Plan [redacted].
      (3) While [redacted] did not contradict [redacted], it's clear to Gateway that this caused some confusion with the ESRB auditors.
      (4) To remove any confusion, Gateway updated [redacted] removing the immediate fire response actions and now just references to refer to the Emergency Response Plan [redacted].
   iii) Attachment Finding 4 contains the applicable revised section of [redacted].
   iv) Status: Closed – 7/29/2025

e) **Finding 5**:
   i) *Work orders for completed tasks have not been closed out*.
   ii) Gateway response to Finding 5:
      (1) At the time of the audit Gateway did have several open work orders for work that had been completed.
      (2) Gateway Technicians received training on the importance of timely closing of work orders.
      (3) Gateway added work order backlog review to the weekly maintenance planning meeting.
      (4) Gateway created a recurring monthly PM to review all work orders and close as needed.
   iii) Attachment Finding 5 contains the monthly PM to review and close work order backlog.
   iv) Status: Closed – 6/19/2025

f) **Finding 6**:
   i) *Leaking backflow preventer valve at facility entrance requires repair*.
   ii) Gateway response to Finding 6:
      (1) Gateway created work order [redacted] to track finding.
      (2) Gateway contracted [redacted] to perform annual backflow inspection and to repair the leaking relief valve that was identified during the audit.
      (3) On August 18, 2025 [redacted] completed the annual inspection and repaired the leaking relief valve.
   iii) Attachment Finding 6a find the repair August 18, 2025, inspection and repair reports.
   iv) Attachment Finding 6b find the photo following repair.
   v) Status: Closed – 08/18/2025

g) **Finding 7**:
   i) *Gateway must investigate and resolve the active* [redacted] *motor alarm on the* [redacted]*-overcurrent protection relay panel*.
   ii) Gateway response to Finding 7:
      (1) Gateway created work order [redacted] to track finding.
      (2) Gateway contracted with [redacted] on June 16, 2025 to diagnose the alarm on the [redacted] relay for [redacted].
      (3) On June 20,2025 the [redacted] Technician completed his diagnoses of the [redacted] alarm. His findings:
         (a) The charging motor and charging motor thermal relay are working as intended.
         (b) It was determined that the alarm contact was wired to a normally closed contact and should be wired to the normally open contact.
      (4) A site substation outage is required to move the wire to a normal open contact and verify proper operation.
      (5) Gateway has a planned outage scheduled from October 20th to October 24th.
      (6) Gateway will complete wiring change and verification during the October outage.
   iii) Attachment Finding 7 contains screenshot of work order.
   iv) Status – Open - tracking to close by 10/24/2025

h) **Finding 8**:
   i) *Gateway did not generate a work order for a fan failure alarm, delaying proper tracking of the issue*.
   ii) Gateway response to Finding 8:
      (1) During the audit, the ESRB auditors reviewed the alarm log in [redacted], the OEM local operating system.
      (2) Gateway is remotely operated by [redacted] who utilizes [redacted] to operate and monitor alarms for Gateway.
      (3) As a remote operated site, the local [redacted] OS is not continuously monitored.
      (4) Gateway did not have a process in place to review alarms that come into the [redacted] OS at the time of the audit, as Gateway relied on [redacted] for alarm response.
      (5) Gateway implemented a weekly review of the alarm log within [redacted].
   iii) Attachment Finding 8 contains the weekly [redacted] alarm inspection.
   iv) Status – Closed – 6/26/2025

i) Finding 9:

i) *Broken and outdated hot sticks were observed in the control house and must be removed or replaced*.

ii) Gateway response to Finding 9:

(1) ESRB auditors found two broken hot sticks which had been left in the corner of the substation control house.

(2) Gateway immediately disposed of the two broken hot sticks.

iii) Attachment Finding 9a photographic evidence of broken hot sticks removal

iv) Attachment Finding 9b current hot stick inventory list with inspection dates.

v) Status – Closed – 6/6/2025

j) Finding 10:

i) *ESRB inspectors observed a flammable material storage cabinet without a self-closing mechanism*.

ii) Gateway response to Finding 10:

(1) The self-closing mechanism on the small flammable cabinet at Gateway had failed.

(2) Gateway purchased a new flammable storage cabinet and disposed of the old cabinet.

iii) Attachment Finding 10 photographic evidence of new flammable storage cabinet.

iv) Status – Closed – 6/26/2025

k) **Finding 11**:
   i) *The hazardous waste collection drum must be clearly labeled*.
   ii) Gateway response to Finding 11:
      (1) Gateway does not store hazardous waste at site. If any hazardous waste is generated it is transported to a proper handing facility.
      (2) Gateway does maintain a hazardous waste storage area with empty drums in case they are needed.
      (3) At the time of the inspection Gateway had an empty drum in the hazardous was storage area. The "Empty" label had fallen off the drum.
      (4) Gateway re-installed "Empty" labels on the drums stored in the hazardous materials area.
      (5) Inspection of hazardous materials storage area to ensure all drums are properly labeled is part of the quarterly site safety inspection.
   iii) Attachment Finding 11 photographic evidence of properly labeled drums in hazardous waste storage area.
   iv) Status – Closed – 6/26/2025

l) Finding 12:

i) Gateway lacks records of required quarterly site safety inspections.

ii) Gateway response to Finding 12:

(1) Gateway created a quarterly site safety inspection PM to comply with this requirement.

(2) The quarterly site safety inspection is divided into different areas of the plant property.

(3) Any findings from the inspection are captured in the work order system and tracked on a site safety inspection tracking document.

iii) Attachment Finding 12a quarterly site safety inspection document.

iv) Attachment Finding 12b sample of quarterly site safety inspection action tracking document.

v) Status – Closed – 9/05/2025

m) **Finding 13**:
   i) *The physical Lockout/Tagout (LOTO) procedure in the LOTO binder is outdated and must be updated*.
   ii) Gateway response to Finding 13:
      (1) Gateway removed and destroyed the outdated printed version, replacing it with the current version of the LOTO procedure.
   iii) Attachment Finding 13 photographic evidence of updated procedure in site safety binder.
   iv) Status – Closed – 7/26/2025

n) **Finding 14**:
   i) *Equipment inspection tags are missing or outdated*.
   ii) Gateway response to Finding 14:
      (1) During the audit closing meeting, the ESRB auditors notified Gateway of three different items associated with tags at Gateway.
      (2) Gateway investigated both items:
         (a) Eyewash Station tags
            (i) At Gateway monthly eyewash station inspections are tracked on a tracking sheet stored in the CMMS. Inspections are not tracked on a tag.
            (ii) Gateway ensured no eyewash station had a miscellaneous tag installed.
            (iii) While Gateway does not agree with the findings as it relates to the eyewash station tags the site implemented the following improvements:
               1. Ensured no eyewash station had a manufacture installed inspection tag.
               2. Installed sticker on each eyewash station that directs people to CMMS for inspection documentation.
               3. Verified in CMMS that all eyewash station inspections had been correctly completed and documented.
         (b) Fire Extinguisher tags
            (i) Gateway performs monthly inspections of all fire extinguishers at site.
            (ii) The Technician initials and dates the tag monthly upon completing the inspection.
            (iii) An outside vendor performs an annual inspection of all Gateway fire extinguishers. Upon completion of the annual inspection the vendor installs a new tag on the extinguisher. The tag identifies the date of the annual inspection.
               1. The last annual inspection for extinguishers installed around the plant was performed on [redacted].
               2. The last annual inspection on the spare fire extinguishers was performed on [redacted].
            (iv) During the April 2025 monthly inspection, the Technician found one extinguisher that was missing the inspection tag.
               1. The Technician replaced the extinguisher with a spare extinguisher and signed the tag.

2. The Technician noted in the CMMS work order that he had found the tag missing and had replaced the extinguisher with a spare.

(v) While Gateway does not agree with the findings as it relates to the fire extinguishers the site did implement the following improvements:

1. Site Manager provided refresher training for all Technicians on steps to take when they find a missing inspection tag.
2. Added a policy to document the inspection tag when the tag was replaced.

iii) Status – Closed – 09/04/2025

o) **Finding 15:**
   i) *The hazardous materials list in the hazardous materials physical folder must be updated to include Gateway 2*.
   ii) Gateway response to Finding 15:
      (1) Gateway reviewed and updated the hazardous materials list to include all hazardous substances present within building 6 and building 7.
      (2) Gateway reviewed the SDS electronic database to ensure all listed items on the hazardous materials list are included within the database.
      (3) Gateway implemented an annual PM to review the hazardous materials list for accuracy.
   iii) Attachment Finding 15a find the Hazardous materials list.
   iv) Attachment Finding 15b find the annual PM to review the hazardous materials list.
   v) Status – Closed – 6/26/2025

p) Finding 16:

i) *Gateway must replace deteriorated signage*.

ii) Gateway response to Finding 16:

(1) Gateway completed a site wide inspection of all signage.

(2) Gateway updated the quarterly site safety inspection to include a check of the condition of all signage. A work order is created for all items found deficient during a quarterly site inspection and are tracked on the quarterly site safety inspection action-item list.

iii) Attachment Finding 16 find photographic evidence of replaced faded signage.

iv) Status – Closed – 6/26/2025

3) Appendix A – Corrective Action Plan

Findings #	CPUC Audit Findings	Action Taken to Close Finding	Assigned to	Status	Date Closed
1	An updated arc flash analysis is needed for equipment last studied in 2020.	[redacted]		In-Progress	
2	The facility should ensure that all agreed-upon items from the Evacuation Drill Report and Critique live document are incorporated into the ERP.			Completed	9/4/2025
3	Lack of documented plan to address insurance recommendation for roof vent fusible link replacement			Completed	9/22/2025
4	Fire procedures in the ERP and the operational emergency response plan should be reviewed and aligned for consistency.			Completed	7/29/2025
5	Old work orders for completed tasks remain open. The facility should close out all completed work orders to maintain accurate records.			Completed	6/19/2025
6	The backflow preventer valve at the front of the facility is leaking and should be repaired.			Completed	8/18/2025
7	A GCB1 motor alarm was active on the 351 overcurrent protection relay panel in the substation control house and needs to be addressed.			In-Progress	
8	A fan failure alarm [redacted] occurred on [redacted] and was acknowledged on [redacted], however no work order was written up for the [redacted] at the time of the audit. Ensure alarms are promptly acknowledged and, if necessary, followed by work order entry in the management system.			Completed	6/26/2025
9	Broken and outdated hot sticks were observed in the control house and should be removed or replaced.			Completed	6/6/2025
10	The site flammable storage cabinet must be self-closing and self-latching to meet safety requirements.			Completed	6/26/2025
11	The hazardous waste collection drum must be clearly labeled.			Completed	6/26/2025
12	Quarterly site safety inspections are required; however, no documentation was provided. The facility should ensure these inspections are being conducted and properly documented.			Completed	9/5/2025
13	The physical Lockout/Tagout (LOTO) procedure in the LOTO binder is outdated by one revision and should be updated			Completed	7/26/2025
14	Eyewash stations, [redacted] and fire extinguishers must have current inspection tags properly signed off monthly or as required. Several items showed missed inspections over multiple months.			Completed	9/4/2025
15	The hazardous materials list in the hazardous materials physical folder must be updated to include Gateway 2.			Completed	6/26/2025
16	Faded stickers and labels were observed throughout the facility and should be replaced to ensure visibility and compliance			Completed	6/26/2025

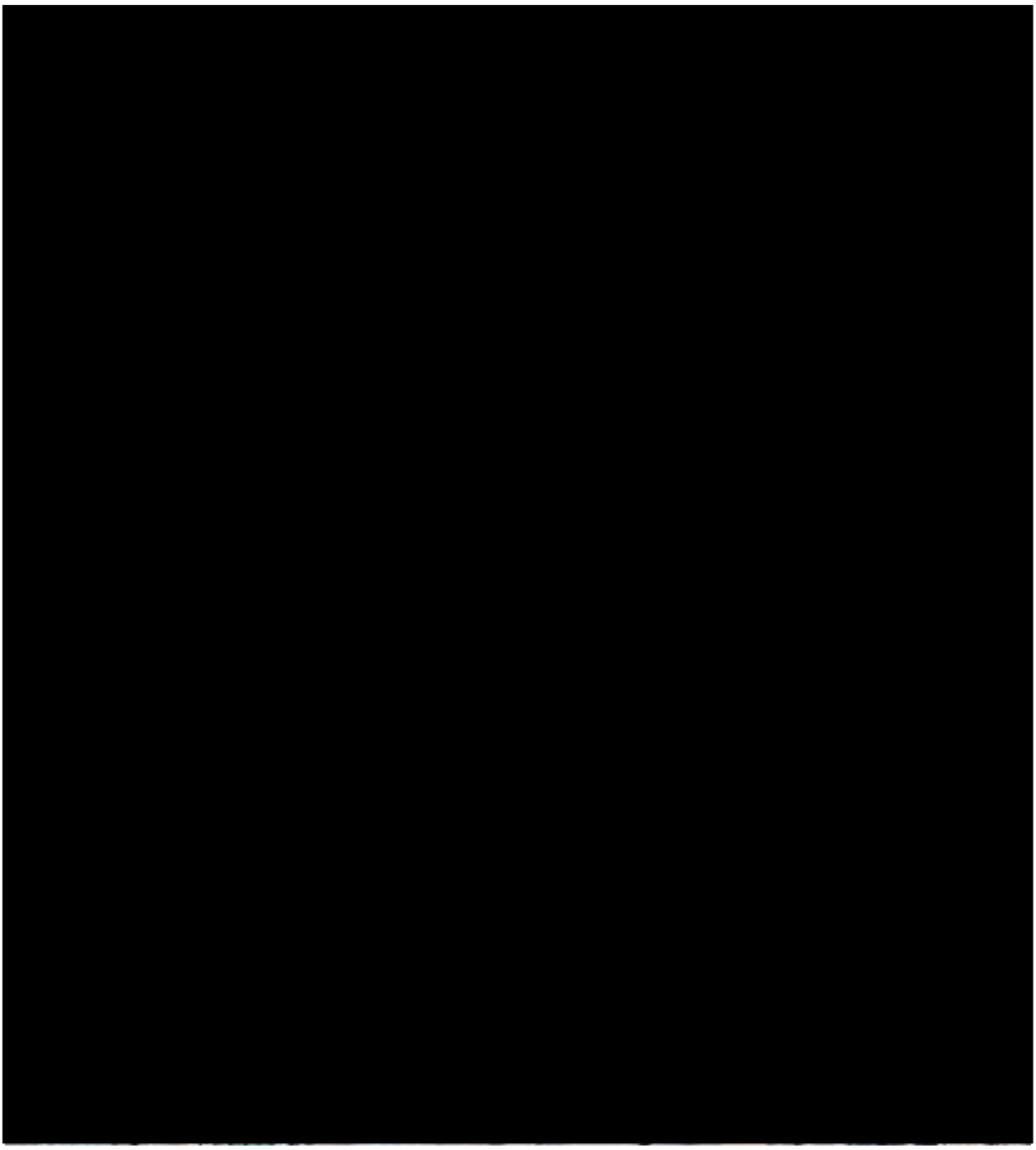
4) Attachment Finding 2

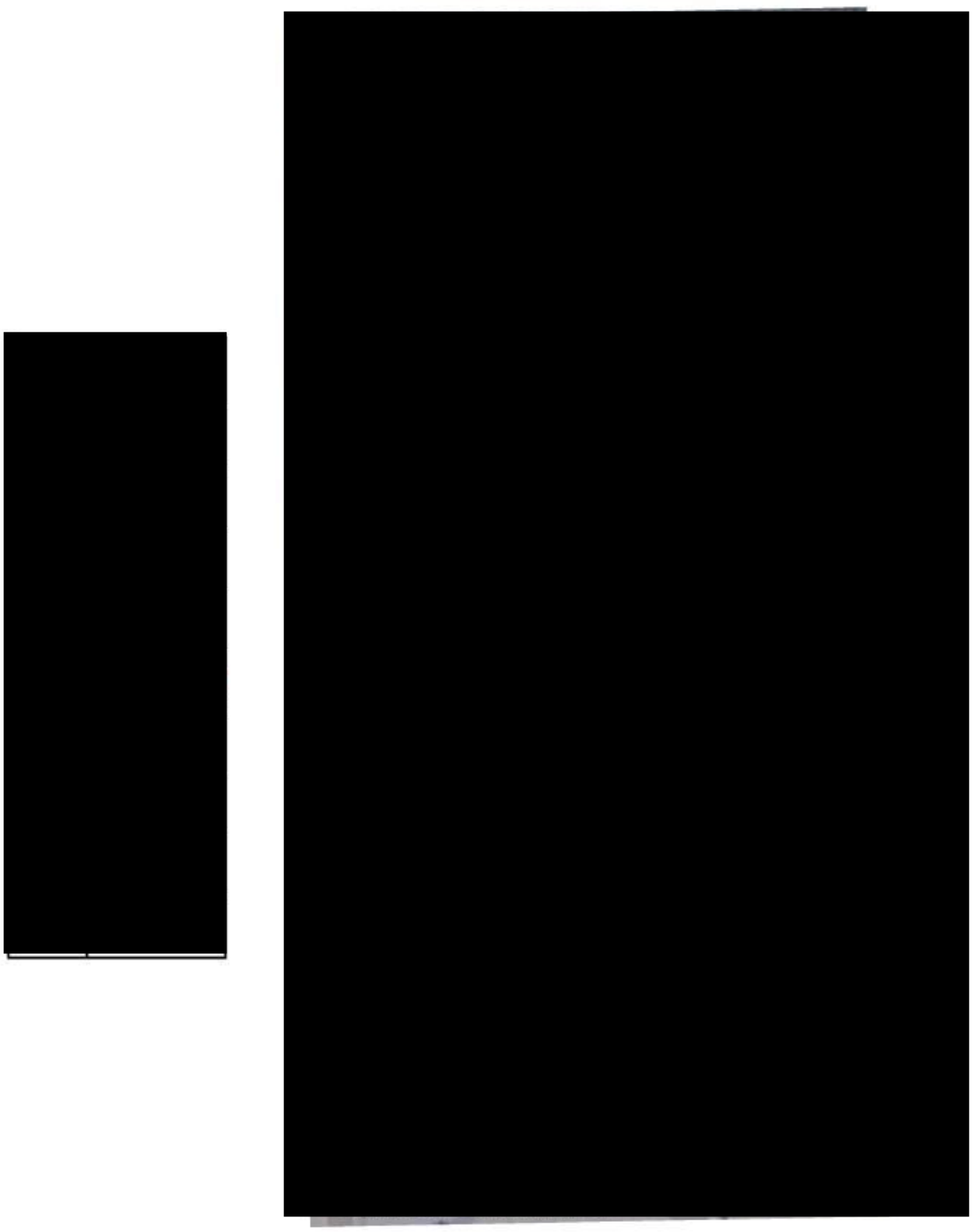
Gateway ENERGY STORAGE

Emergency Response Plan

[redacted]

Name: **Gateway Energy Storage**	Type: **Electric Storage Facility**	**Lithium-ion Battery Storage**
Address: 641 & 645 Camino De La Fuente, San Diego, 92154	[redacted]	





5) Attachment Finding 4

GATEWAY Energy Storage	GATEWAY ENERGY STORAGE **OPERATIONAL EMERGENCY RESPONSE**	[redacted]

1.0 PURPOSE

This procedure provides a list of possible operational emergencies and the correct response actions should they occur.

2.0 GENERAL

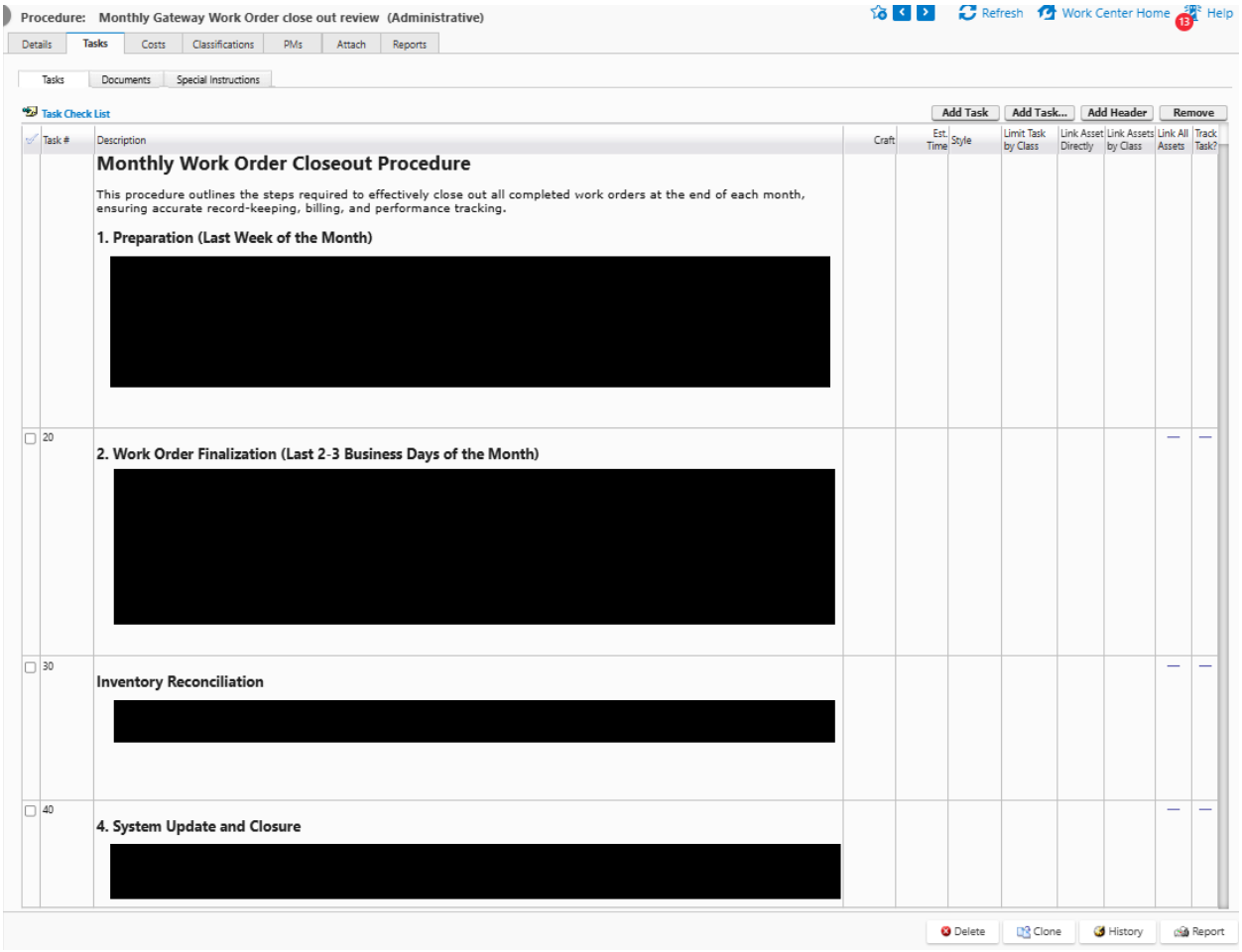
The following situations and responsive actions are not to be considered all inclusive, as it is not feasible to list every possible plant operational emergency which may arise. Operational experience, actual plant conditions at the time, good engineering practices and common sense must be considered in any emergency condition, but the listed responses should be considered as sound and decisive corrective actions. These emergency procedures are more definitive by their nature; therefore, these responses should generally be followed unless a good reason exists not to do so.

3.0 GUIDELINES

3.1 **Fire onsite**

3.1.1 Reference Site Emergency Response Plan [redacted].

6) Attachment Finding 5



7) Attachment Finding 6a

[redacted]

ACCOUNT INFORMATION

Location Name		Meter Number
GATEWAY ENERGY STORAGE		
Contact Name	**Contact Email**	**Phone** [redacted]
Service Address: [redacted]		**Account Number** [redacted]
Protection Type ☐ Containment ☐ Isolation	**Hazard Type**	**Hazard Level** ☐ High ☐ Low

ASSEMBLY INFORMATION

Device Type	Make	Model	Size	Serial Number	New Install Date
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Location [redacted]					

TESTING & MAINTENANCE

	Check Valve #1	Check Valve #2	Relief Valve	PVB/SVB	Shut Off Valves	#1	#2
Initial Test	[redacted]			☐ Air Inlet Opened at _____ PSID ☐ Opened Fully ☐ Check Held at _____ PSID ☐ Leaked	Closed Tight Leaked	☐ ☐	☐ ☐
REPAIR				☐ Cleaned Replaced: ☐ Air Inlet Disc ☐ Air Inlet Spring ☐ Check Disc ☐ Check Spring ☐ Float ☐ Diaphragm ☐ Rubber Kit ☐ Other			
Final Test				Air Inlet _____ PSID CK Valve _____ PSID	Closed Tight	☐	☐

Line Pressure at Time of Test	Test Date	System Test Result
[redacted]	2025-08-18	[redacted]

Remarks
Leak reported- Passed after clean and Flush

TESTER ATTESTATION, TEST KIT INFORMATION & TEST RESULTS

☒ The above report is certified to be true.

Gauge Make	Model	Gauge No.	Calibration Date
[redacted]	[redacted]	[redacted]	[redacted]
Tester Name [redacted]	**Testing Company** [redacted]		**Cert No.** [redacted]

[redacted]

ACCOUNT INFORMATION

Location Name		Meter Number
GATEWAY ENERGY STORAGE		
Contact Name	**Contact Email**	**Phone** [redacted]
Service Address: [redacted]		**Account Number** [redacted]
Protection Type ☐ Containment ☐ Isolation	**Hazard Type**	**Hazard Level** ☐ High ☐ Low

ASSEMBLY INFORMATION

Device Type	Make	Model	Size	Serial Number	New Install Date
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Location [redacted]					

TESTING & MAINTENANCE

	Check Valve #1	Check Valve #2	Relief Valve	PVB/SVB	Shut Off Valves	#1	#2
Initial Test	[redacted]	[redacted]	[redacted]	☐ Air Inlet Opened at _____ PSID ☐ Opened Fully ☐ Check Held at _____ PSID ☐ Leaked	Closed Tight Leaked	☐ ☐	☐ ☐
R E P A I R	[redacted]	[redacted]	[redacted]	☐ Cleaned Replaced: ☐ Air Inlet Disc ☐ Air Inlet Spring ☐ Check Disc ☐ Check Spring ☐ Float ☐ Diaphragm ☐ Rubber Kit ☐ Other			
Final Test	[redacted]	[redacted]	[redacted]	Air Inlet _____ PSID CK Valve _____ PSID	Closed Tight	☐	☐

Line Pressure at Time of Test	Test Date	System Test Result
[redacted]	2025-08-18	[redacted]

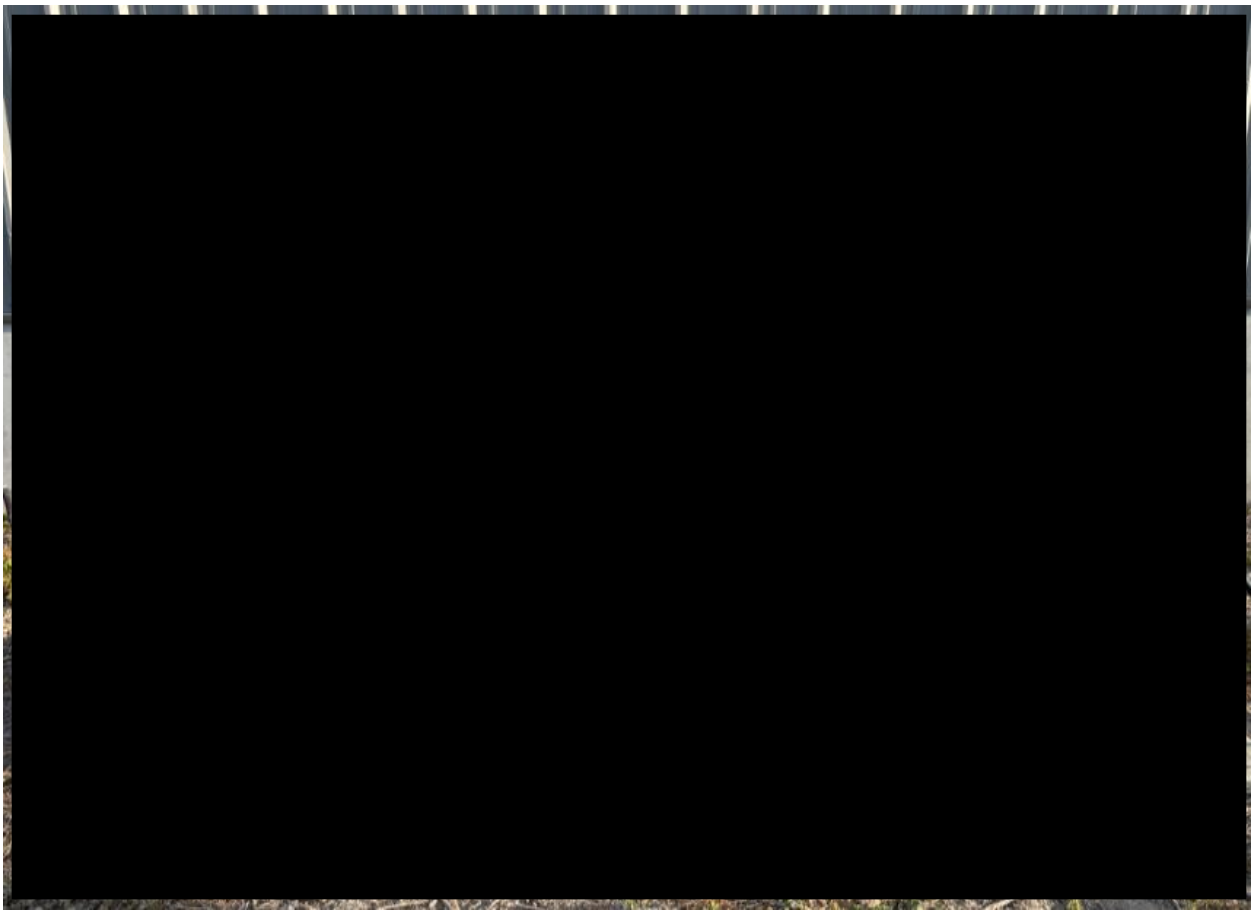
Remarks
Leak reported- passed after clean and flush

TESTER ATTESTATION, TEST KIT INFORMATION & TEST RESULTS

☒ The above report is certified to be true.

Gauge Make	Model	Gauge No.	Calibration Date
[redacted]	[redacted]	[redacted]	[redacted]
Tester Name [redacted]	**Testing Company** [redacted]		**Cert No.** [redacted]

8) Attachment Finding 6b



Backflow preventer post leak repair – photo taken 9/23/2025

9) Attachment Finding 7

9/2/25, 2:02 PM Work Orders (No Grouping)

REV Renewables

Work Order [redacted]

Gateway Energy Storage
Issued
Printed 9/2/2025 - 2:01 PM (Duplicate Copy)

Maintenance Details

Requested By: [redacted]
Phone:
Email:
Taken By:
Problem: Alarm (ALARM)
Last PM: N/A

Target:
Priority/Type:
Supervisor: [redacted]

Model:
Serial:
Manufacturer:
Vicinity:

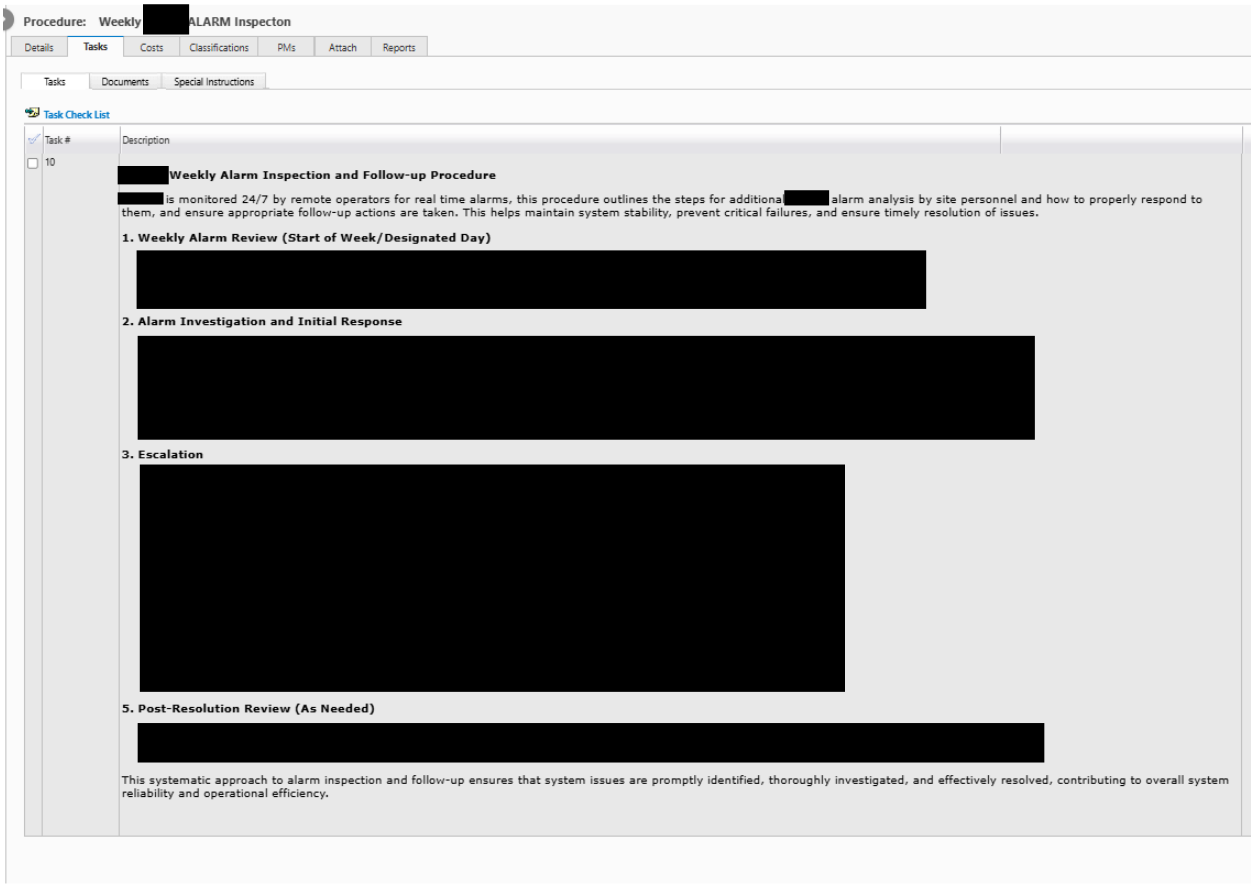
Reason: [redacted] Relay In Control House: Loss of Motor Power [redacted] in Substation. Alarm indication on relay indicates loss of motor function on [redacted] in the substation. Likely hood of not being able to close in breaker after being opened.

☑ Shutdown ☑ Attach

Tasks

#	Description	Rating	Meas.	Initials	Failed	N/A	Complete
10	T/S Loss of [redacted] Motor Power on [redacted] relay in control house. (Alarm indicates that there is not adequate power to close the breaker).			[redacted]	☐	☐	☑
20	Report findings and repair. **Comments: This task requires followup steps to complete the repair.** [redacted]			[redacted]	☐	☑	☐
30	[redacted] Field Inspection scheduled for 06/20/25 **Comments: [redacted] completed a field inspection. I have attached their findings to this work order.** [redacted]			[redacted]	☐	☐	☑
40	Follow-up task after the field inspection. [redacted] will be completing a review of the system design, the wiring schematics, the relay configuration, and comparing those to industry best practices to make sure the relay is configured to alarm when it needs to and displays no alarms when operating in a non-alarm state. This will require an outage where we can perform point to point testing and breaker trip testing to confirm every point is setup correctlt. [redacted] **Comments: This task was completed. [redacted] performed an additional analysis and confirmed their recommendations are the best course corrective action. To complete this repair [redacted] will perform their corrective actions during the outage in October, then this will be confirmed by manually tripping and re-closing each breaker for a point to point verification. Partially completed because Completed as requested. Completed as requested. Completed as requested.**			[redacted]	☐	☐	☑
50	This task is to be completed during the October 2025 outage. The wiring can be corrected and the breaker positions cwill be verified.			[redacted]	☐	☐	☐
					☐	☐	☐

10) Attachment Finding 8



Procedure: Weekly [redacted] ALARM Inspecton

Details | Tasks | Costs | Classifications | PMs | Attach | Reports

Tasks | Documents | Special Instructions

Task Check List

Task #	Description
10	[redacted] **Weekly Alarm Inspection and Follow-up Procedure**

[redacted] is monitored 24/7 by remote operators for real time alarms, this procedure outlines the steps for additiona[redacted] alarm analysis by site personnel and how to properly respond to them, and ensure appropriate follow-up actions are taken. This helps maintain system stability, prevent critical failures, and ensure timely resolution of issues.

1. Weekly Alarm Review (Start of Week/Designated Day)

[redacted]

2. Alarm Investigation and Initial Response

[redacted]

3. Escalation

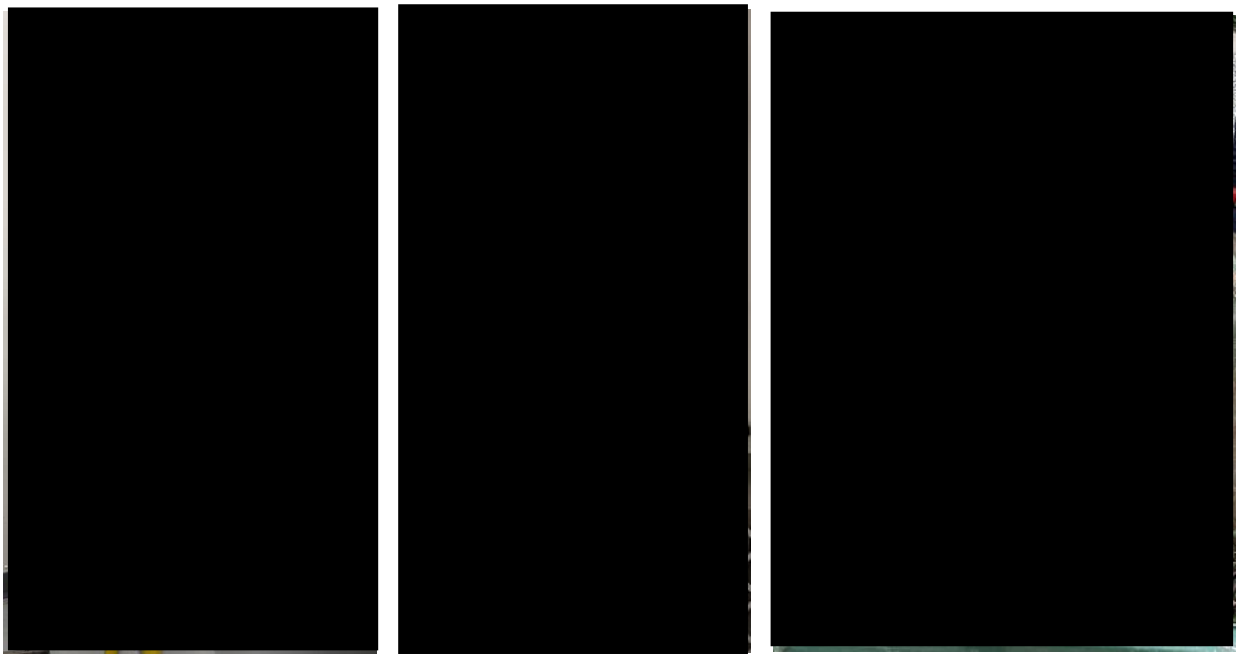
[redacted]

5. Post-Resolution Review (As Needed)

[redacted]

This systematic approach to alarm inspection and follow-up ensures that system issues are promptly identified, thoroughly investigated, and effectively resolved, contributing to overall system reliability and operational efficiency.

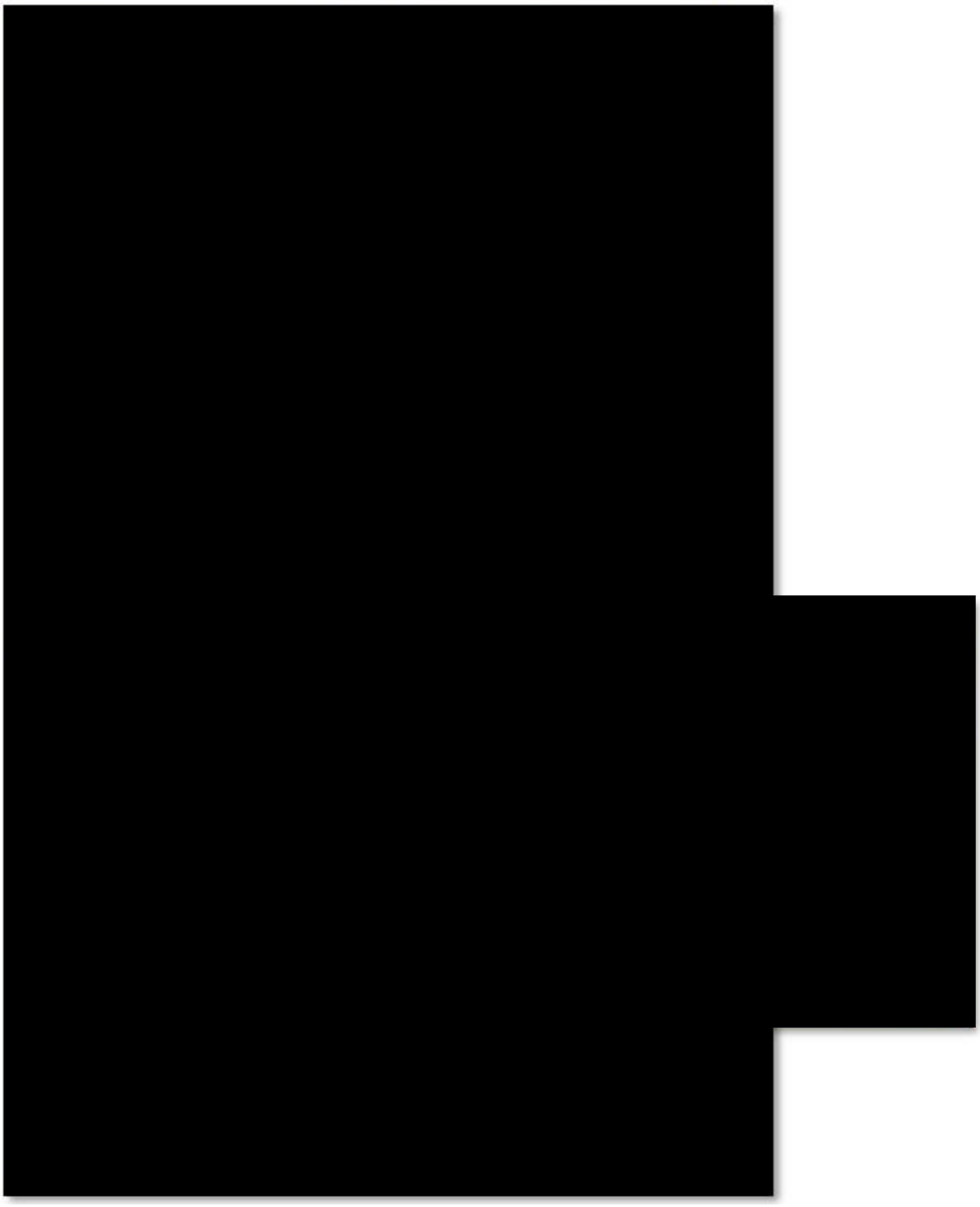
11) Attachment Finding 9a



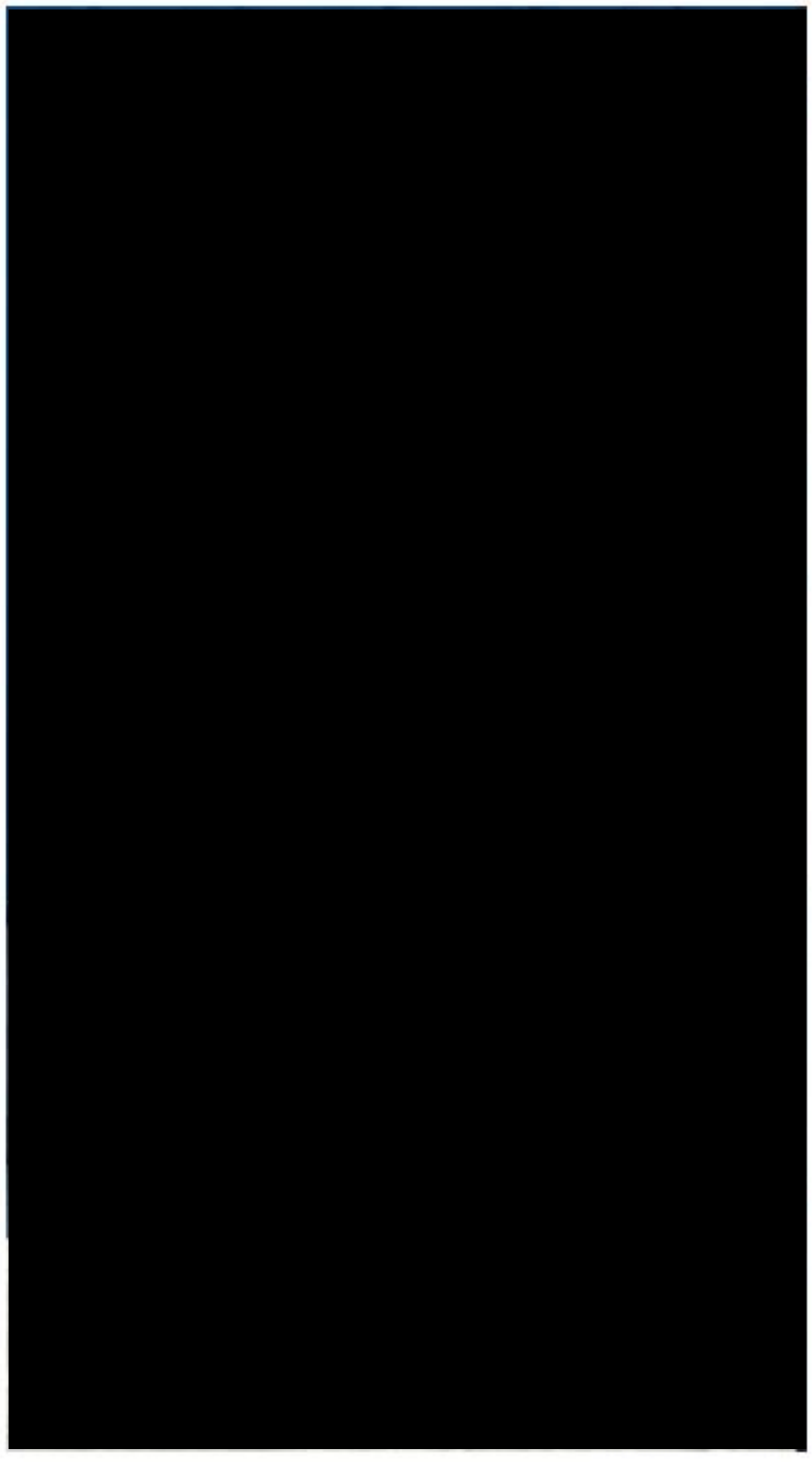
12) Attachment Finding 9b

Model #	Description	Mfg. Date	Last Recert Date	Next Recert Date
[redacted]				
[redacted]				
[redacted]				

13) Attachment Finding 10



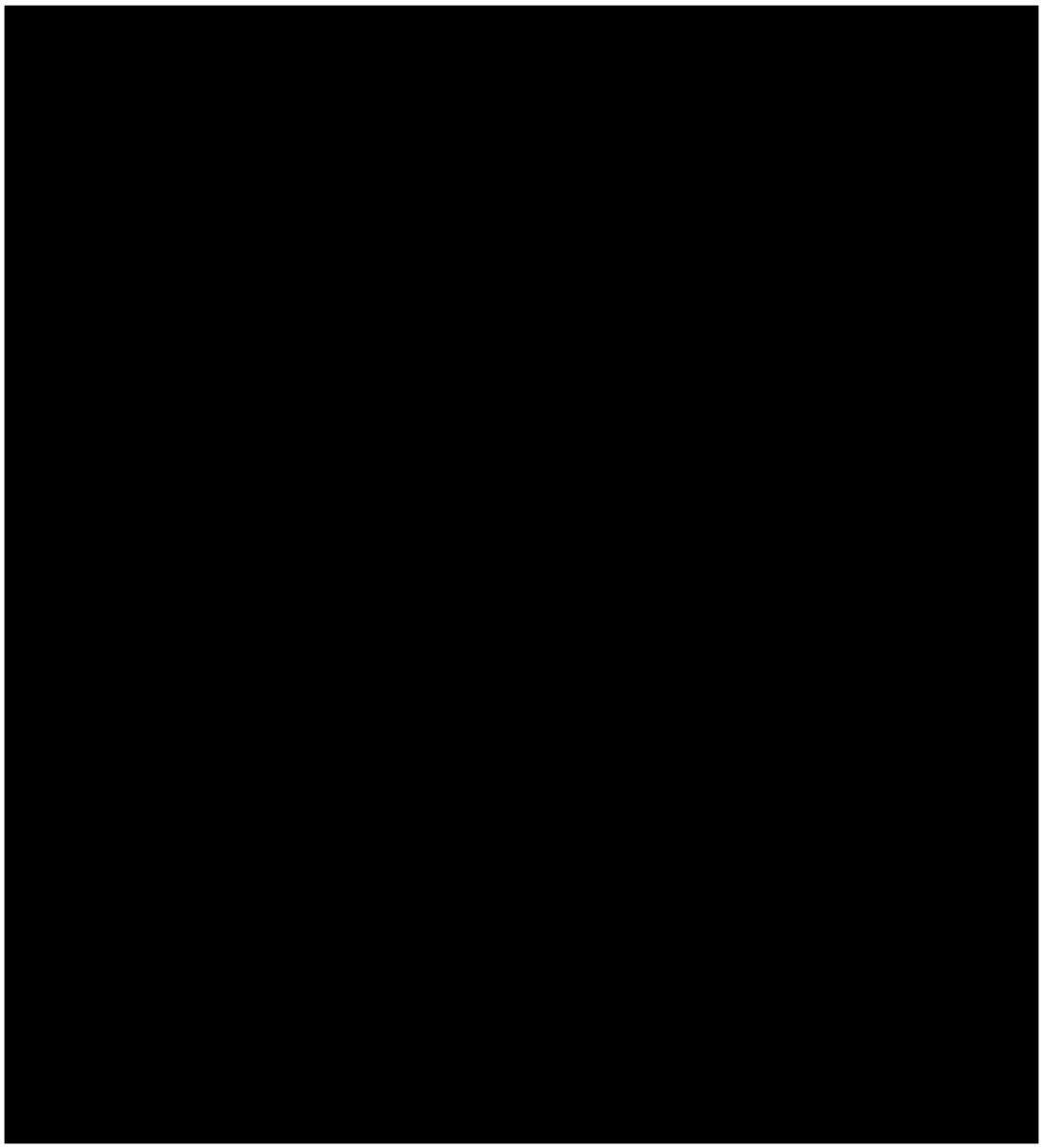
14) Attachment Finding 11



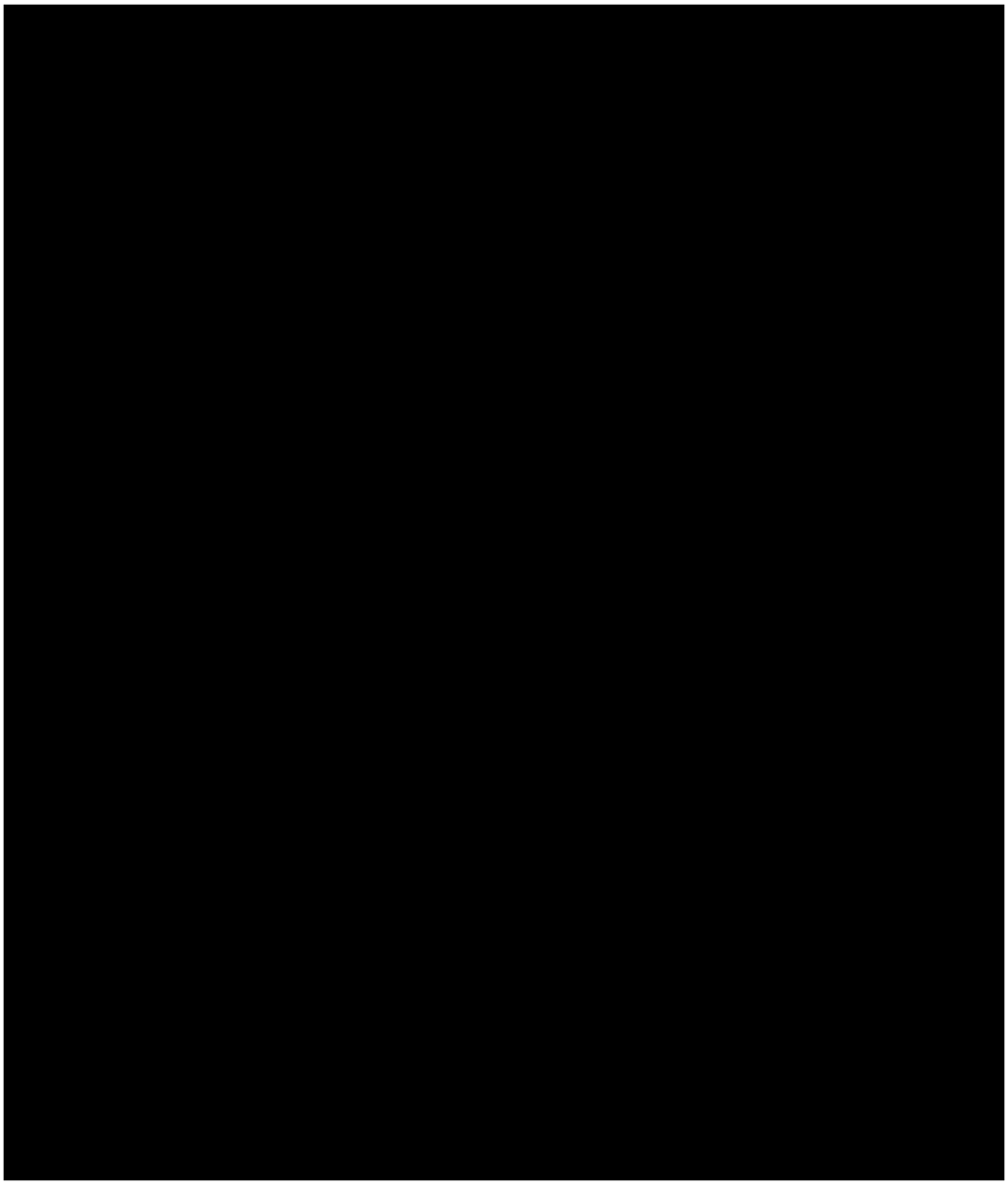
Labeled empty drums in Hazardous Waste Collection area

15) Attachment Finding 12a

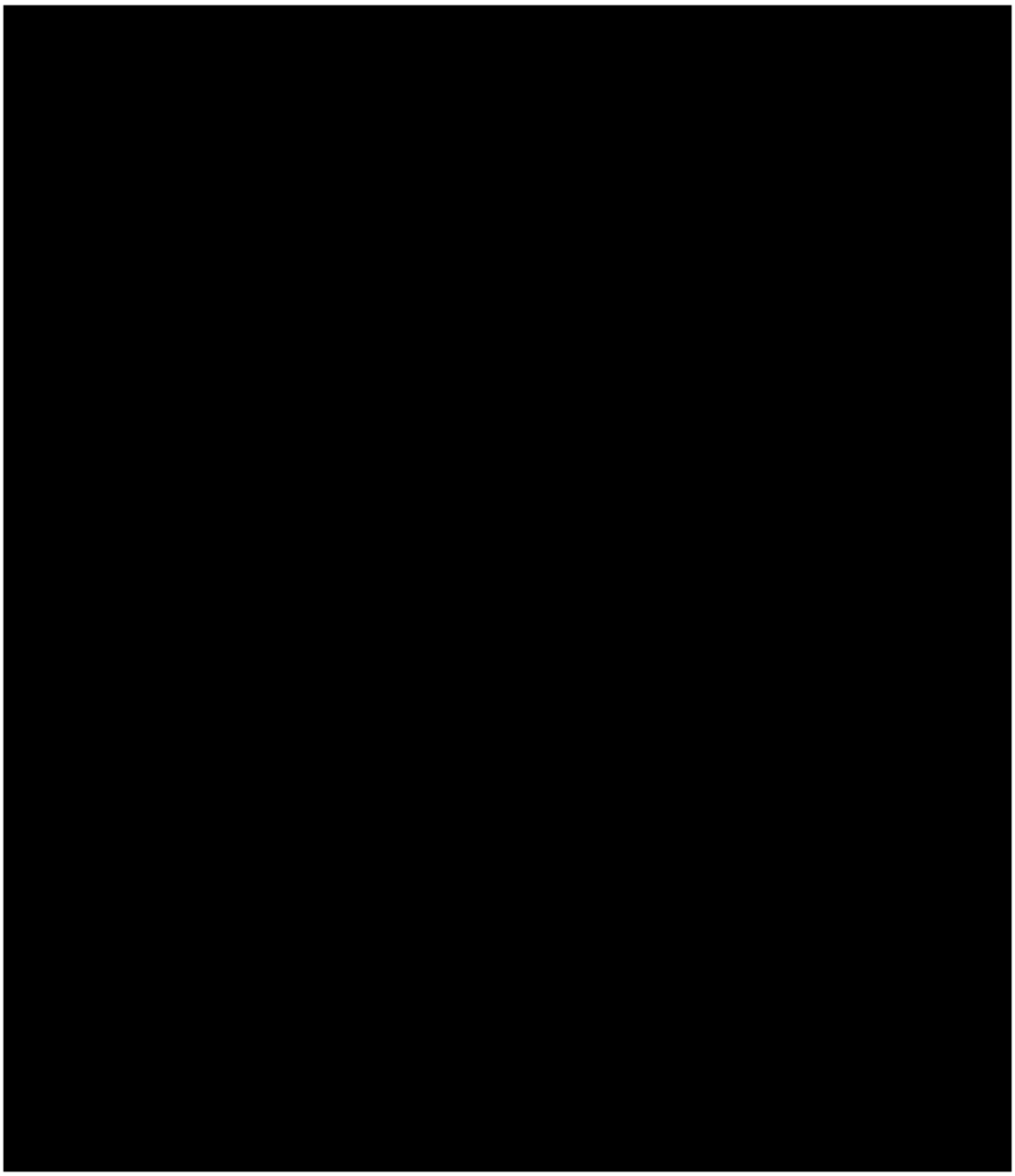
Gateway Quarterly Site Safety Inspection



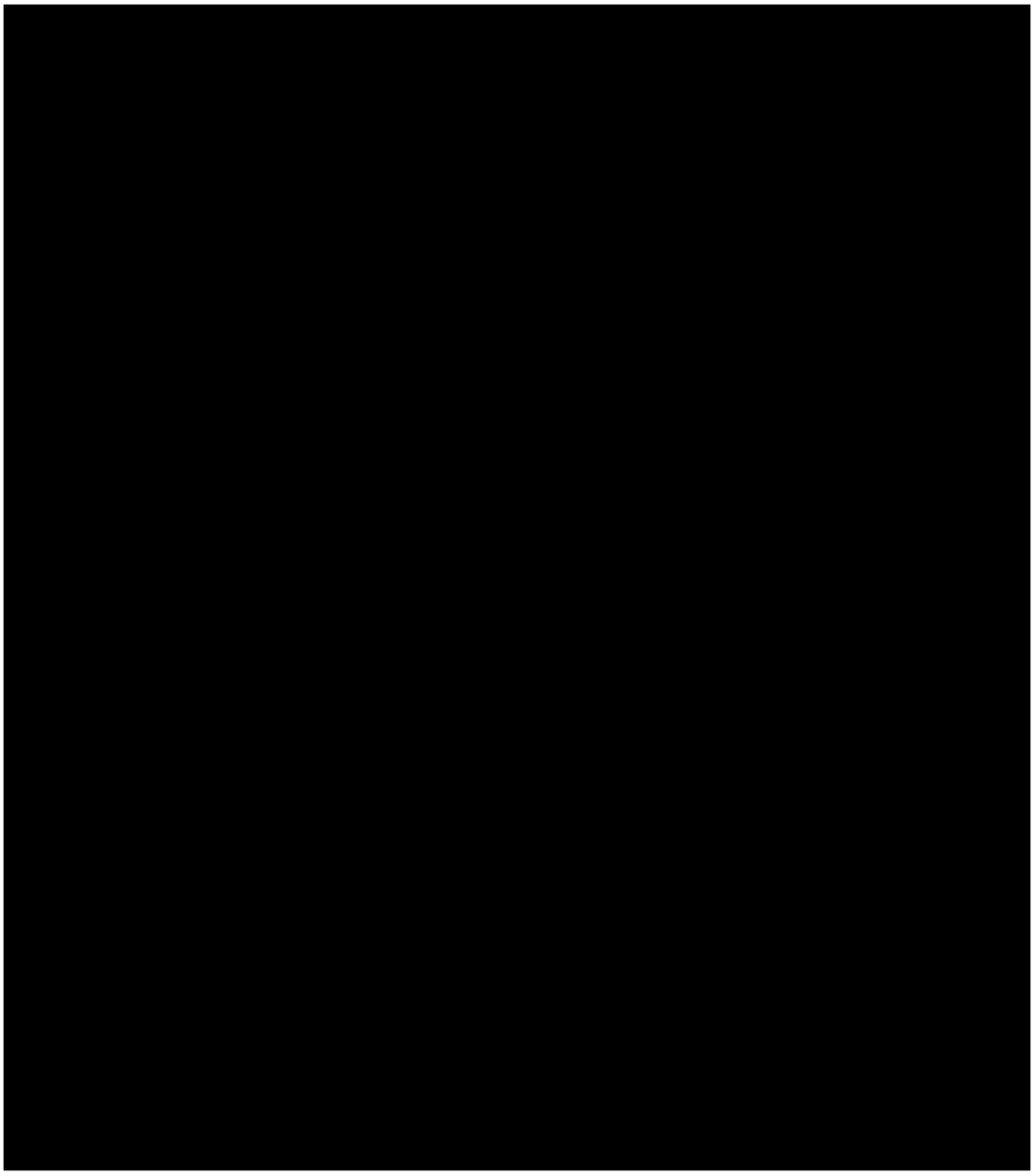
Gateway Quarterly Site Safety Inspection



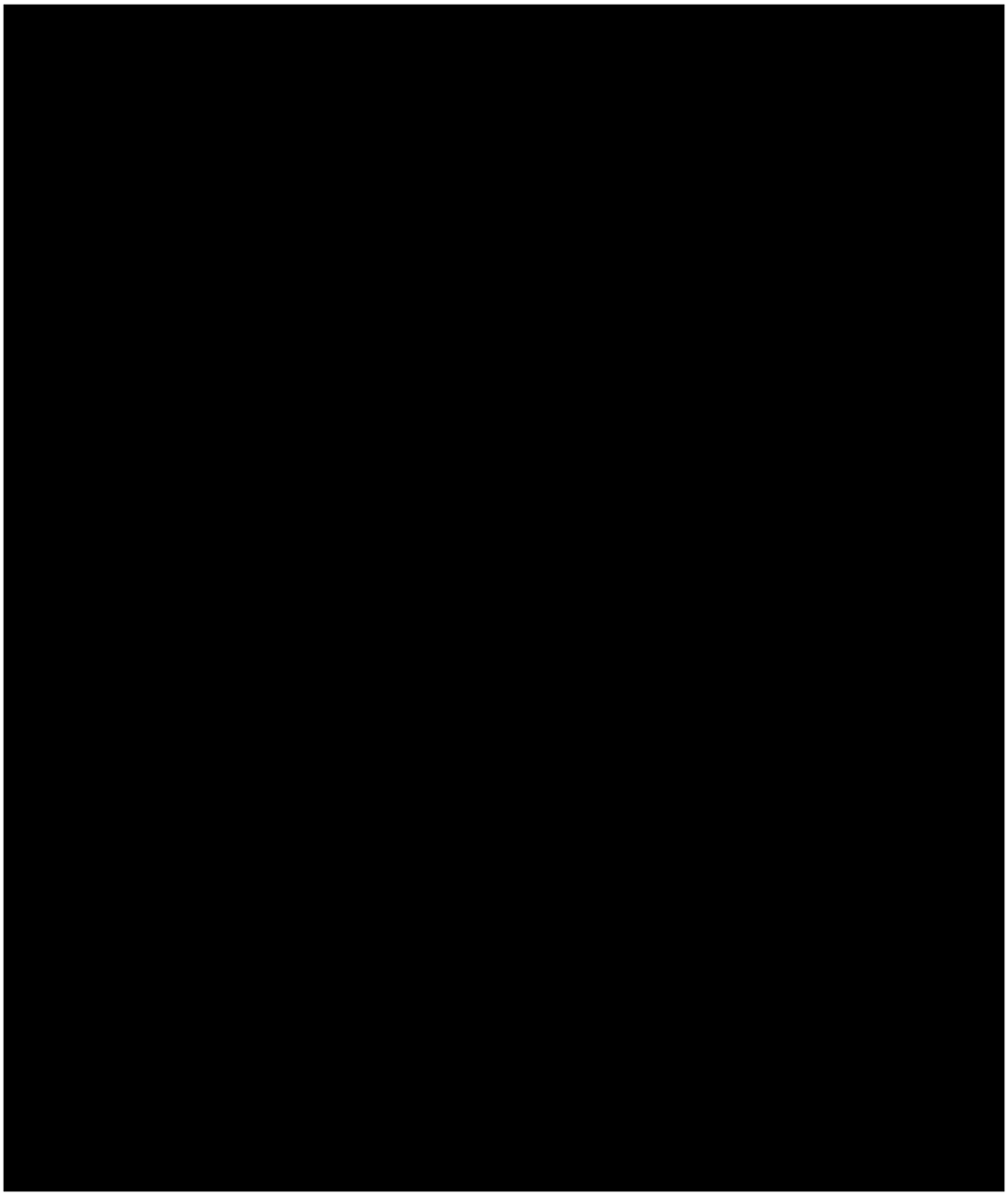
Gateway Quarterly Site Safety Inspection



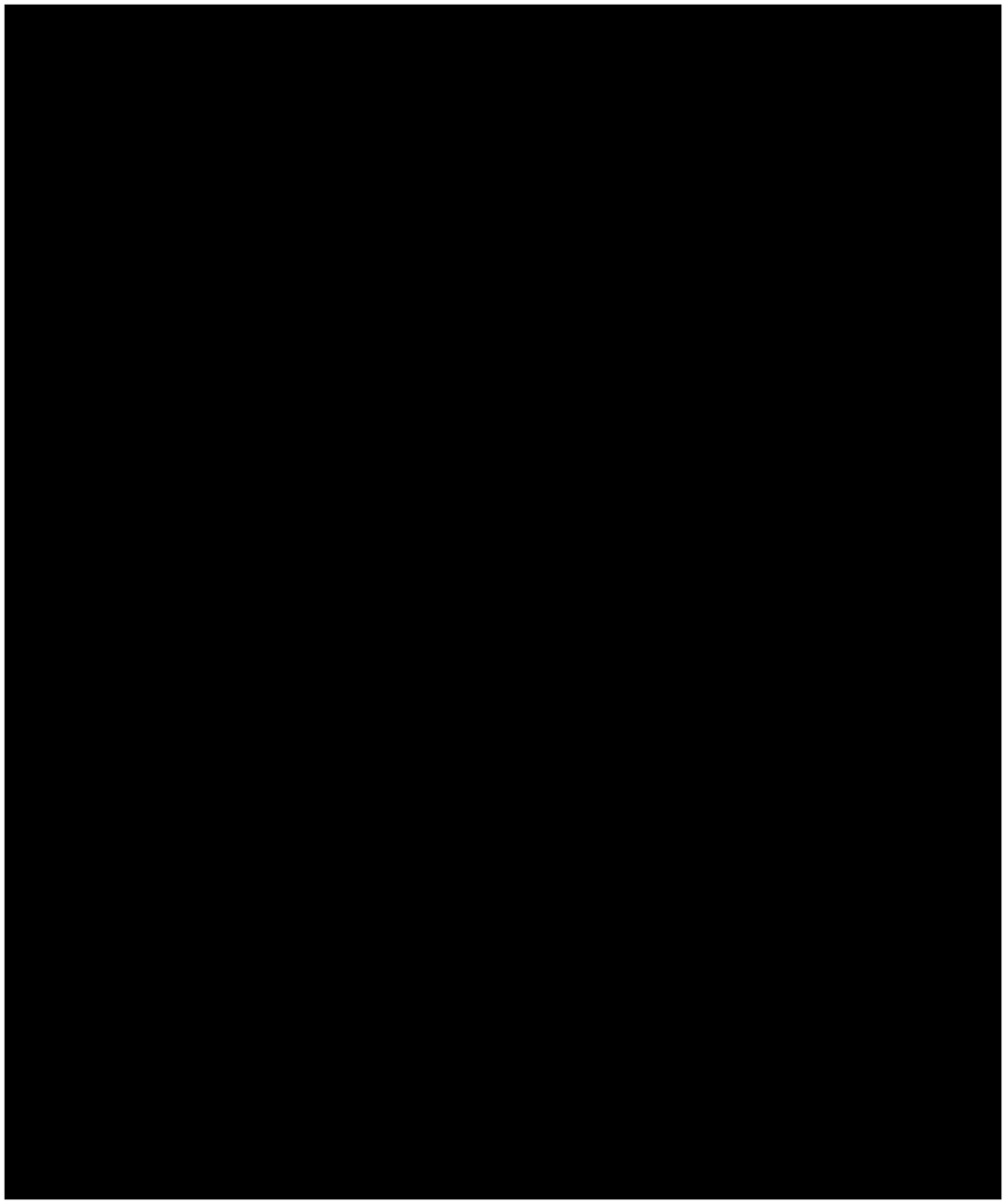
Gateway Quarterly Site Safety Inspection



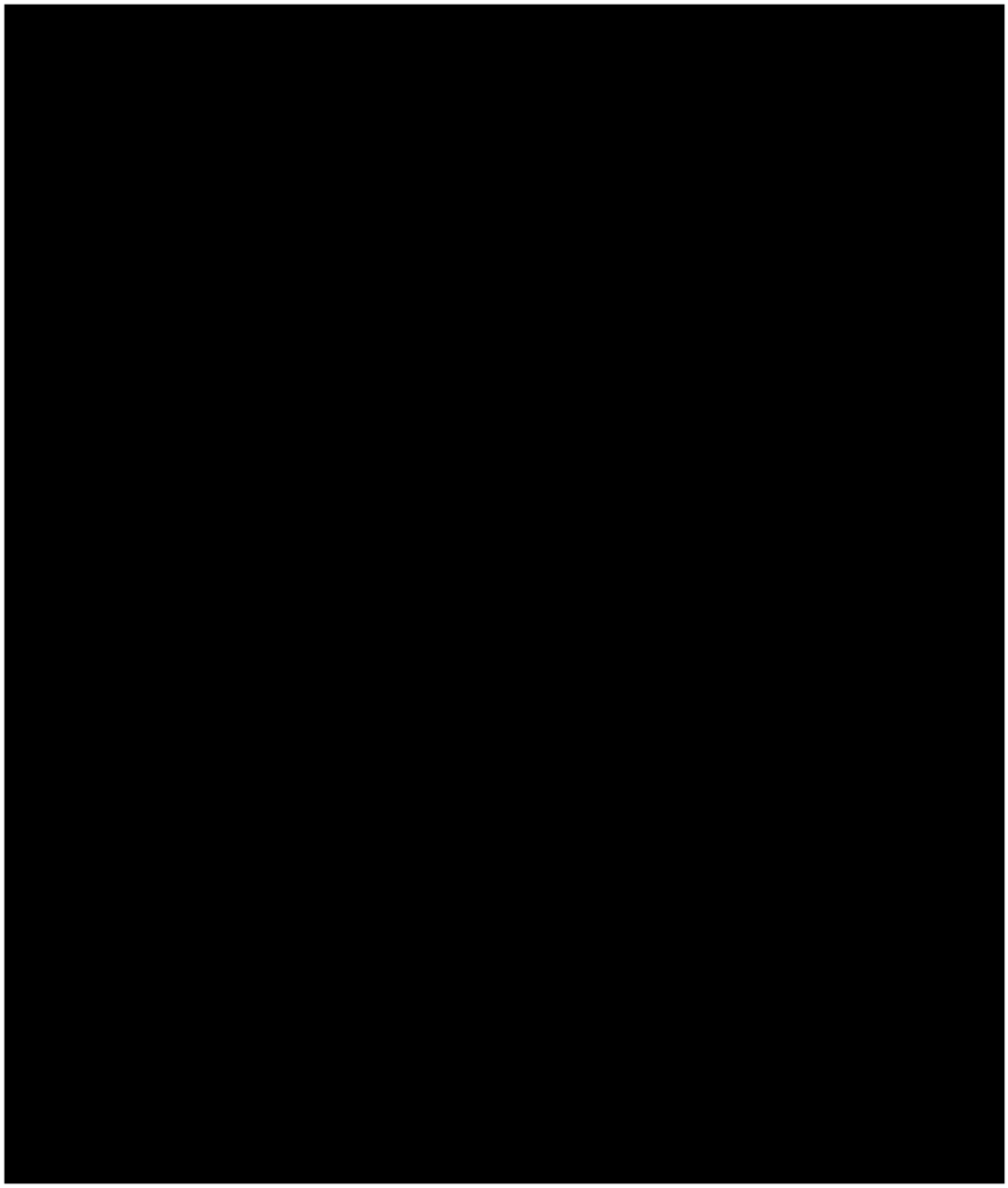
Gateway Quarterly Site Safety Inspection



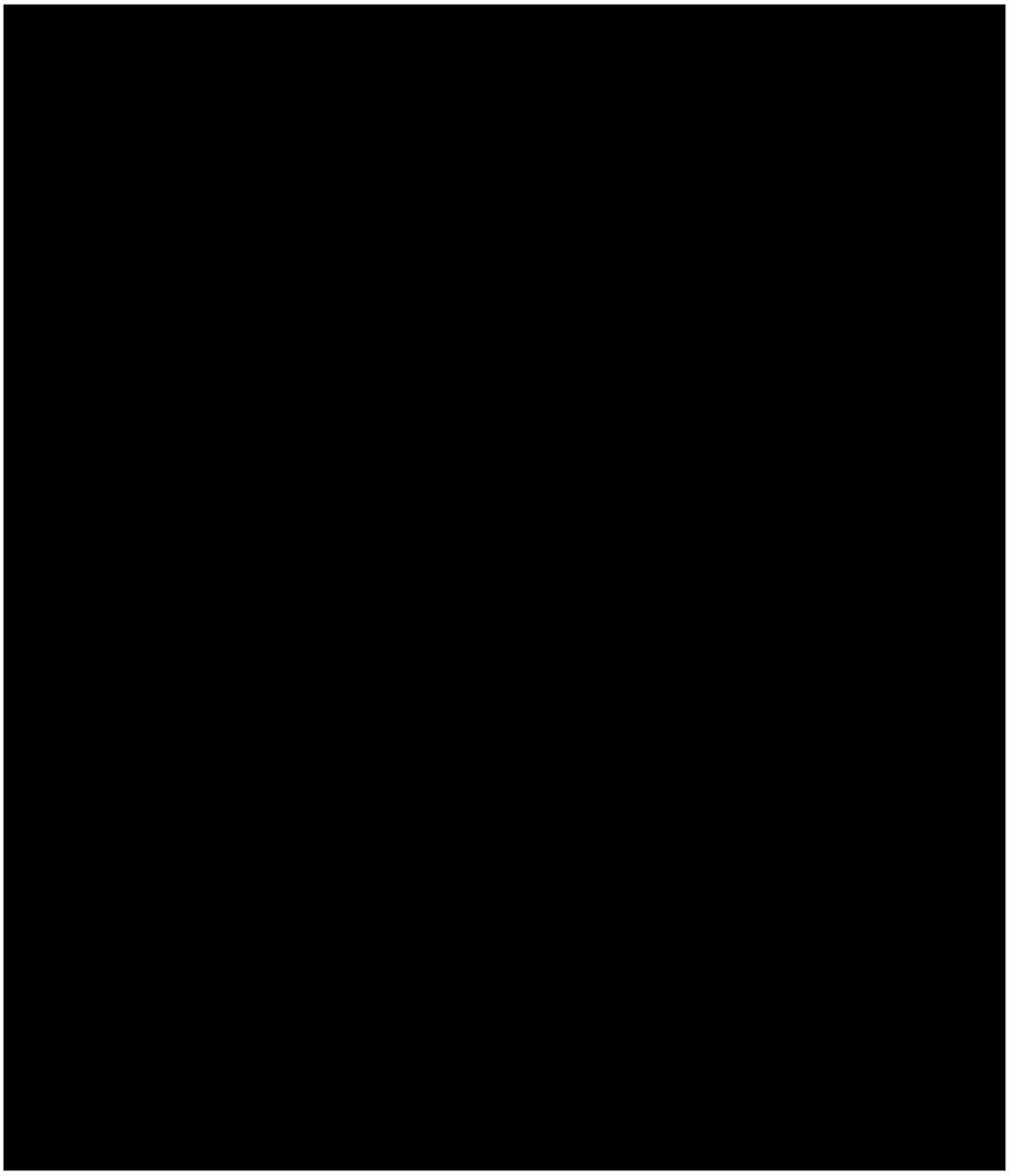
Gateway Quarterly Site Safety Inspection



Gateway Quarterly Site Safety Inspection



Gateway Quarterly Site Safety Inspection



Gateway Quarterly Site Safety Inspection

16) Attachment Finding 12b

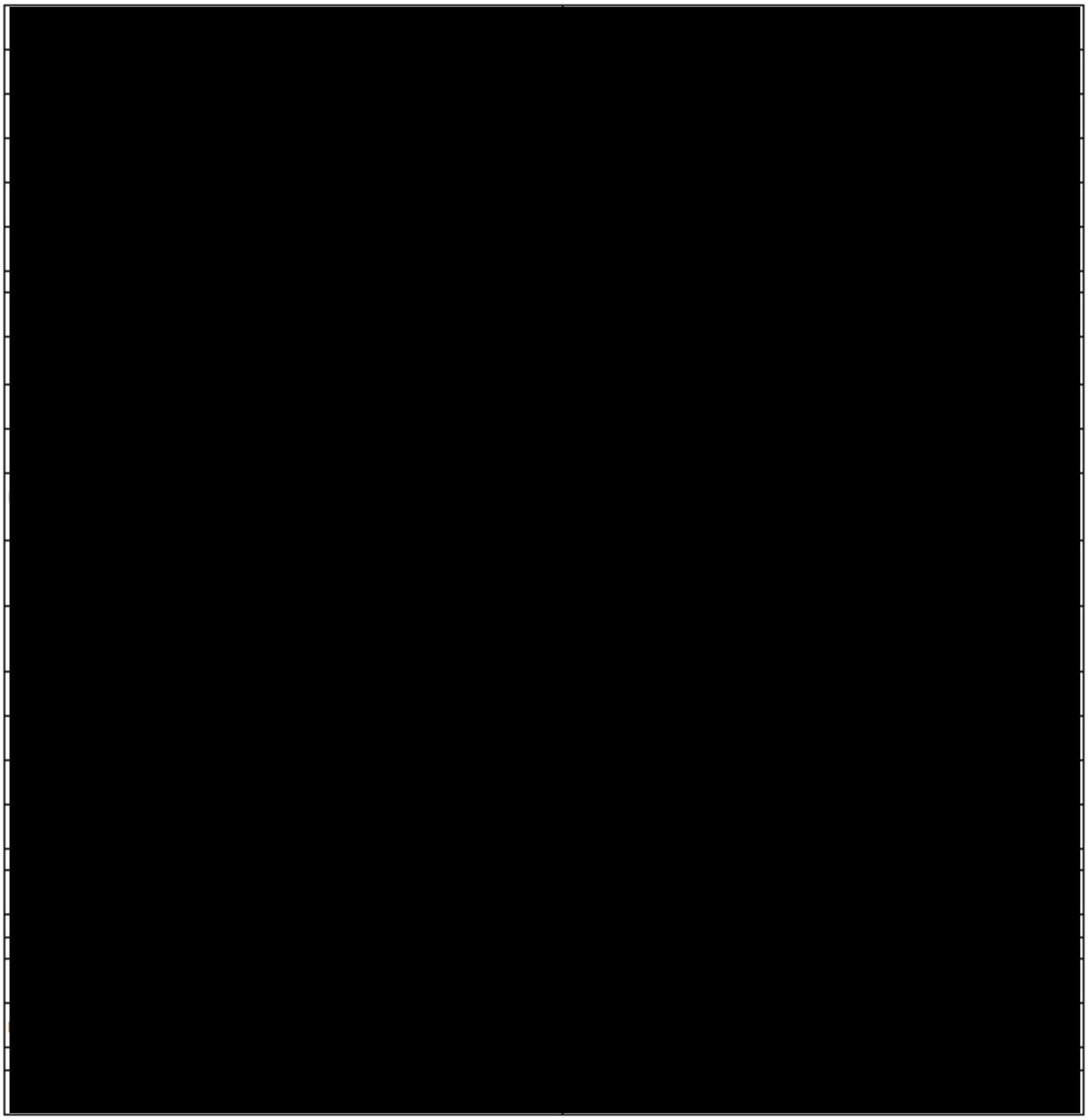
Action Item Tracking - Quarterly Site Safety Survey

Reference #	Findings	Action Taken to Close Finding	Assigned to	Status	WO #	Target Closure Date	Date Close	Notes
1	[redacted]	[redacted]	[redacted]	Completed	[redacted]	7/15/20225	8/15/2025	[redacted]
3				Completed		7/15/2025	8/25/2025	
4				Completed		6/30/2025	6/20/2025	
6				Completed		6/30/2025	6/20/2025	
7				Completed		6/23/2025	7/31/2025	
8				Completed		7/15/2025	7/22/2025	
9				In-Progress		10/15/2025		

17) Attachment Finding 13

18) Attachment Finding 15a

Safety Data Sheet Index	
Name	Manufacturer
[redacted]	



19) Attachment Finding 15b

9/23/25, 9:16 AM Work Orders (No Grouping)

REV Renewables

Work Order [redacted]

Gateway Energy Storage
Closed
Printed 9/23/2025 - 9:16 AM

Maintenance Details

Requested: 8/1/2025 9:12:00 AM
Phone:
Email:
Problem: Preventive Maintenance (PM)
Last PM: 9/10/2025
Reason: Hazardous material List Annual Review

Target: 9/25/2025
Priority/Type: 2 - Normal / Preventive

Gateway

Labor

Labor	Work Date	Start	End	Reg Hrs	OT Hrs	Other Hrs
[redacted]	8/1/2025			[redacted]		

Labor Report

Completed: 8/1/2025 9:14:00 AM **Failure:** **Meter(s):**

Report: PM completed by [redacted] Review conducted with site manager.

Signature / Name | Date | Signature / Name | Date

20) Attachment Finding 16