

Daggett 2025 CPUC GO167 Audit Findings

Audit Finding	Corrective Action(s) Requested	Corrective Action Plan	By When	Complete (DATE)
Daggett Solar Power 2, Daggett Solar Power 3, and Battery Energy Storage System (Daggett) did not report a 2024 fire incident involving Inverter INV-82 to the California Public Utilities Commission (CPUC), as required.	Daggett must implement procedures and train its personnel to ensure that all future incidents are reported to the CPUC in accordance with applicable requirements.	Develop a procedure that defines the factors qualifying an event as one that must be reported to the CPUC. The procedure will also specify the required timeframe for making the communication and the method by which communication will occur.	9/19/25	
Daggett did not submit a compliant Hazard Mitigation Analysis (HMA)	Prepare and submit a complete, site-specific HMA that evaluates the required single-fault failure modes, demonstrates conformance with the fire code's performance criteria, and reflects actual site conditions and equipment configurations. Submit the approved HMA to ESRB for review and verification.	A Project Safety Plan has been identified for both Daggett 2 and Daggett 3 and is being submitted together with these responses. HMA is referenced in 2.6.12 in the attached Project Safety Plan and Documentation.		8/26/25
Update the BESS Emergency Response Plan (ERP) to ensure accuracy, completeness, and annual review	Revise the BESS ERP to include current contact information, update any placeholder content with site-specific information, and document completion of the annual review process. Submit the updated ERP to ESRB for review and verification.	The EAP cannot be modified at this time, as the EPC is still onsite performing construction activities. Permit requirements mandate that the existing EAP remain in place until construction is complete.		
Establish coordination with the local fire department	Establish coordination with the local or regional fire department, submit the BESS ERP to the county, and provide the ERP to the fire department for review. Also maintain documentation of all fire department visits, training sessions, and coordination efforts conducted on site. Submit supporting documentation verifying completion of these actions to ESRB for review and verification.	The BESS ERP will be distributed to the local fire departments by email once it is provided by the Safety Department. In addition, hard copies will be delivered in person to the respective departments.	9/12/25	
Update Lock out Tag out (LOTO) procedures to reflect current procedures being followed	Review and revise its LOTO procedure to ensure it accurately reflects current practices, equipment, and staff responsibilities. Also provide the updated LOTO procedures to ESRB for review and verification.	No further action will be taken. The LOTO procedure is already complete as it stands.		
Hot Sticks in Silver Springs Substation indicated that the equipment was due for biennial inspection	Provide ESRB with the latest inventory list of hot sticks in place and their inspection records.	The hot sticks due for inspection have been delivered to Burlington Safety Laboratories. Once they are returned, we will provide the inspection documentation.	10/3/25	
NOVEC fire suppression system in server room lacks inspection documentation	Either provide ESRB with a timeline for decommissioning the NOVEC fire suppression system or provide a timeline for completing a full inspection of the system by qualified personnel, along with proper documentation to verify compliance.	An inspector from Cal-Counties Fire Protection Inc. is being scheduled to perform an inspection of the NOVEC fire suppression system and all fire extinguishers on site. Once the inspection is completed, the corresponding documentation will be provided.	10/3/25	
The Plant did not identify or document the high temperature alarm on the Hydran M2-X serving Transformer T1 at Silver Springs Substation	Evaluate the following alarm conditions, document all findings and corrective actions, and ensure that transformer alarms are routinely reviewed and recorded in the work order management system. Submit the resulting work orders and evaluation summaries to ESRB for review and verification.	The alarms on the Hydran M2-X and the GSU T2 Transformer at the Silver Springs Substation were not active at the time and have been cleared. A warranty claim has been submitted to Siemens to address the alarm lights on the T1 Transformer at the Cumberland Substation. Although the LED indicators display "Fans Failure," testing confirmed that all fans are functioning properly. If an outage is required for this work, it will not be able to commence until after the maintenance outage blackouts are completed on November 1, 2025.	11/1/25	
The Plant did not provide vegetation management procedures that clearly define the tasks and steps required to perform vegetation management at the facility	Develop and implement a vegetation management procedure that addresses these key elements and reflects site-specific conditions. Submit the completed procedure to ESRB for review and verification.	The Daggett site team will collaborate with the Environmental Department to identify an appropriate vegetation management plan.	10/10/25	
Visitor and contractor orientation is missing site-specific information	Revise the orientation program to include clearly labeled evacuation paths, muster points, and the layout of the O&M building. Include site-specific hazards, a site map, and a formal verification process. Ensure the orientation is reviewed annually and has a documented revision history. Submit the updated orientation to ESRB for review and verification.	Completed		8/25/25

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Emergency Action Plan (EAP) must be updated to reflect current site conditions	Clearly mark muster points, install signage, update references to emergency equipment (e.g., stretcher), ensure consistency between physical and digital copies, and review the EAP annually.	stretcher was present on site during the audit, and photographs have been taken for submission. Muster point signs have been installed at the designated locations as outlined in the EAP.		8/22/25
Daggett evacuation drills need improved record keeping and documentation	Ensure that all future evacuation drills include participant sign-in sheets, formal debriefings, and written summaries of lessons learned and corrective actions.	When hard copies of the ERP are provided to the local fire departments, coordination will also begin for an evacuation drill, tentatively scheduled for early to mid-October. Documentation for this drill will be submitted to the CPUC upon completion.	10/31/25	
Inadequate documentation control across multiple safety and operational records	Implement a comprehensive documentation control system for required records. Submit its implementation plan to ESRB for review and verification.	All procedures have been completed using rev boxes.		8/25/25
Windssocks are not installed on site	Install at least one windssock in a visible location to aid evacuation and safety decisions.	Windssocks to be installed on August 29, 2025.	8/29/25	
National Fire Protection Association (NFPA) 704 Placards at front gate do not reflect highest site hazards	Provide documentation verifying that CUPA requested current hazards, or update placards to indicate highest hazard levels for each category.	The signage at the front gate has been updated and pictures will be submitted.		8/11/25
Several controlled documents were not signed off following annual review and versions were unclear	Ensure all controlled documents are reviewed annually, signed off, and clearly marked. Submit updated, signed versions to ESRB for review and verification.	Completed		8/25/25
Fire Extinguishers Missing Monthly Checks	Ensure monthly inspections of all portable fire extinguishers and maintain accurate inspection records per NFPA 10 and Cal OSHA.	Monthly inspection reviews will ensure all inspections are completed on time and documented correctly.	8/29/25	
Expired Medication was found in Silver Springs Substation	Maintain up-to-date emergency medical supplies to ensure site readiness and compliance.	New First Aid Supply kits were installed and inspected for any expired medications.		8/11/25
Daggett did not submit all requested documents for the audit	Ensure that all documentation requested through the pre-audit data request is provided to ESRB inspectors prior to the audit and by the specified due date.	Acknowledged. We will comply with data requests going forward.		8/11/25