

IP Oberon, LLC and IP Oberon II, LLC CPUC Audit GA2025-07OS Response

CPUC Audit GA2025-07OS

IP Oberon, LLC, and IP Oberon II, LLC

March 24 – 27, 2025

CORRECTIVE ACTION PLAN

Submitted on June 27, 2025

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Corrective Action Plan

I. Remediated Audit Findings:

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

- a) **Finding Description:** 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.
- b) **Remediation Action:** On June 19, 2025, IP Oberon, LLC and IP Oberon II, LLC procured and installed Muster Point signage outside the BESS yard and O&M Building.
- c) **Associated Evidence:** See files named: “Finding 2_BEES MP Signage”, “Finding 2_O&M Signage”, and “Finding 2_Substation MP Signage”.

Finding 6: ESRB inspectors observed a flammable material storage cabinet without a self-closing mechanism

- a) **Finding Description:** 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.
- b) **Remediation Action:** On June 20, 2025, IP Oberon, LLC and IP Oberon II, LLC worked with Tesla to fit self-closing mechanisms to the flammable material storage cabinets on site. After fitting the self-closing mechanism, Tesla personnel tested the cabinets to ensure they were in proper operating condition. A self-latching mechanism was already installed on the cabinet and is in proper working condition. See file named: “Flammable Locker Auto-Close Video”.
- c) **Associated Evidence:** See files named “Finding 6_Flammable Locker Auto-Close Hinge” and “Finding 6_Flammable Locker Auto-Close Video”.

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

- a) **Finding Description:** Oberon staff must follow the procedures they have in place including monthly ladder inspections.
- b) **Remediation Action:** IP Oberon, LLC and IP Oberon II, LLC have confirmed with the O&M that the ladder inspection form will be used moving forward and available to each of the O&M’s employees through their EHS portal. As a preventative control, IP Oberon, LLC and IP Oberon II, LLC had its onsite employee add a placeholder on the second to last Wednesday of every month in their calendar to review the EHS portal to confirm that the monthly ladder inspections have occurred. The O&M has also ordered tags for each of the ladders which have been attached to each ladder.

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- c) **Associated Evidence:** Please see files named “Finding 7_Ladder Inspection Form 1”, Finding 7_Ladder Inspection Form 2”, Finding 7_Ladder Inspection Form 3”, and “Finding 7_Ladder Inspection Form 4” which depicts the inspection form that employees will be completing starting July 1st. Please see file named “Finding 7_Ladder Inspection Tag” for evidence of ladder tags being placed on each ladder. Please see file named “Finding 7&10&12_Verify Monthly PMs and Work Orders” for evidence of the monthly placeholder to review the monthly ladder inspections.

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

- d) **Finding Description:** 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.
- e) **Remediation Action:** IP Oberon, LLC and IP Oberon II, LLC have worked with the O&M to update the Annual Maintenance Schedules to include a new item that focuses on the three-month inverter inspections. These inspections will occur on a quarterly basis and begin next quarter, Q3.
- f) **Associated Evidence:** Please see files named “Finding 13_Oberon 1 Annual Maintenance Schedule 2025 Update”, “Finding 13_Oberon 2 Annual Maintenance Schedule 2025 Update”, and “Finding 13_Inverter Maintenance” which depict both the updates that have been made to the Annual Maintenance Schedules and the procedure that lists Task 1 which is the steps that will be taken during this preventative maintenance work.

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II. Items in Progress

The planned dates of remediation listed in the table below were selected based on the estimated date to remediate all findings. Findings may be remediated sooner; therefore, our actual remediation dates will be supplied when providing an update to the Corrective Action Plan.

Finding Number	Corrective Action	Remediation Action(s)	Planned Date of Remediation	Planned Evidence of Remediation
1	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.	<p>IP Oberon, LLC and IP Oberon II, LLC have been working with both Tesla and the O&M to develop a formal process and flowchart for communicating and tracking maintenance related issues. The procedure named “IP Oberon, LLC – Third Party Maintenance Communication and Tracking Procedure” will be provided to CPUC once it is published.</p> <p>While the formal process and flow chart are being developed, IP Oberon, LLC and IP Oberon II, LLC have worked with Tesla to verify the appropriate mechanism to document and track progress for maintenance related items. The "Tesla Energy Service Portal" will be utilized when Tesla identifies one or more new issues during routine BESS maintenance and inspection activities. To accomplish this, Tesla personnel will create a "Concern ticket" that will be generated with a description of the findings and assign it to IP Oberon, LLC and IP Oberon II, LLC employees. Once the ticket is created, IP Oberon, LLC and IP Oberon II, LLC can request that the O&M provides updates of resolution and progress in the Concern ticket. Please see file named “Finding 1_Tesla Portal for Customer Communications” which demonstrates a screenshot of the “Tesla Energy Service Portal” with the “Create Concern” button listed in the top right corner.</p>	9/25/2025	IP Oberon, LLC – Third Party Maintenance Communication and Tracking Procedure and associated flow chart
3	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	IP Oberon, LLC and IP Oberon II, LLC are working with the O&M provider to update the “BESS Locations and Alarm Panels” map in the Emergency Action Plan to indicate where the satellite hazardous waste accumulation area is on site. IP Oberon, LLC and IP Oberon II, LLC will provide this updated map to CPUC once it has been published.	9/25/2025	A “BESS Locations and Alarms Panels” map from the Emergency Action Plan depicting satellite hazardous waste accumulation area

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	unlabeled container is immediately labeled with all required information and must submit photographic documentation of the corrective action to ESRB for review and verification.	On June 19, 2025, IP Oberon, LLC and IP Oberon II, LLC worked with Tesla to remove the unlabeled container from the site and install signage to clearly identify where the satellite hazardous waste area is on site. To demonstrate completion of this, IP Oberon, LLC and IP Oberon II, LLC have provided the files named "Finding 3_Containers Removed", "Finding 3_BESS Satellite Signage 1", and "Finding 3_Containers Removed".		
4	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.	<p>IP Oberon, LLC and IP Oberon II, LLC have discussed proper storage of AEDs and other emergency tools with the O&M team. Both parties have agreed that a revision is needed of both the Emergency Response Plan and Environmental Health & Safety Manual to remove this requirement due to safety concerns. Extreme heat is prevalent in the summer months and storing AEDs in idling/off vehicles subjects these devices to ambient temperatures well above their recommended storage rating. IP Oberon, LLC and IP Oberon II, LLC have seen that continued exposure to high ambient temperatures often results in the AEDs no longer being effective, functional, or operable. By retaining this requirement within the Emergency Response Plan and Environment Health & Safety Manual, IP Oberon, LLC and IP Oberon II, LLC believe there would be a real safety risk in the event of an emergency through use of these affected devices that would delay critical care to the individual(s) who require it. IP Oberon, LLC and IP Oberon II, LLC will still store and maintain AEDs throughout the site according to the Emergency Action Plan in the O&M Office and Substation Control House as they allow for proper storage temperatures to be achieved.</p> <p>IP Oberon, LLC and IP Oberon II, LLC will provide its updated Emergency Response Plan and Environmental Health & Safety Manual to the CPUC once it has been approved for publication.</p>	9/25/2025	Updated Emergency Response Plan and Environmental Health & Safety Manual
5	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	On June 5, 2025, IP Oberon, LLC and IP Oberon II, LLC worked with the O&M to label the front gates of the BESS yards and the substation with NFPA 704 placards that reflect the maximum hazard ratings commensurate with the chemicals present in those areas. See files named "Finding 5_BESS 1 NFPA Signage", "Finding 5_Substation NFPA Signage", and "Finding 5_Switchyard NFPA Signage" that demonstrate this	9/25/2025	Pictures showing additional NFPA 704 placards have been installed

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	present in each area. Oberon must submit photographic documentation of the installed NFPA 704 placards to ESRB for review and verification.	<p>has been completed. IP Oberon, LLC and IP Oberon II, LLC have worked with the O&M to procure an additional placard for BESS yard 2. Once that placard has been installed a photo will be provided to CPUC.</p> <p>To support site wide awareness of the hazardous materials, IP Oberon, LLC and IP Oberon II, LLC have worked with the O&M to procure more NFPA 704 placards to place around various internal areas around the site that are accessible to individuals working within. Please see file named “Finding 5_Additional NFPA Placard Order” which shows this has been ordered. IP Oberon, LLC and IP Oberon II, LLC will provide pictures of these additional NFPA 704 placards once they arrive and have been installed.</p>		
8	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.	<p>IP Oberon, LLC and IP Oberon II, LLC are in the process of developing a formal written plan of action to remediate the current damaged modules on site. As part of this plan of action, a warranty claim will be submitted to First Solar (Panel OEM), and a formal Root Cause Analysis (RCA) will be requested from them. Due to the nature of the panels being geographically located in the CA desert, which is subject to extreme heat and other various weather conditions, damaged panels are not uncommon. IP Oberon, LLC and IP Oberon II, LLC contains approximately 1,465,000 panels and it’s likely that damaged panels will exist onsite.</p> <p>Due to the recurring nature of damaged/broken panels a solar site experiences, the OEM generally does not provide an RCA for any individual panel. Nonetheless, we will request a root cause analysis from the OEM and file a warranty claim.</p> <p>To reduce the extent of concurrent damage to panels and equipment, IP Oberon, LLC and IP Oberon II, LLC have implemented detective control to conduct annual infrared drone flyovers to check on the health and availability of panels. The site is currently conducting a flyover remediation and the estimated timeline to complete this remediation is 07/28/2025.</p> <p>In addition to the annual infrared drone flyovers, weekly inspections are conducted of the site to check for damaged</p>	9/25/2025	Formal plan of action to remediate currently damaged modules

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		<p>equipment. When a damaged panel is found, remediation for those affected panels will either be carried out by the OEM or the O&M. Generally, if the panels are damaged, and not covered under warranty, they are flagged by the O&M and swapped out with spares on site.</p> <p>Once the formal plan of action has been approved, IP Oberon, LLC and IP Oberon II, LLC will provide a copy to CPUC.</p>		
9	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.	IP Oberon, LLC and IP Oberon II, LLC are in process of submitting tools for annual calibration services. These services will include calibrating tools on site. An updated calibration list, that includes the most recent calibration date and next due date, is being drafted for approval with all the calibration tooling required. Once the calibration list has been approved for publication, IP Oberon, LLC and IP Oberon II, LLC will provide this file to CPUC.	9/25/2025	Updated calibration inventory list that includes dates of most recent calibration and next due date
10	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.	<p>IP Oberon, LLC and IP Oberon II, LLC verified with the O&M that each individual generator step up transformer oil sample is reviewed by a third party. Any oil sample noted by the third party that is abnormal and/or outside of the acceptable liquid power factor range is required to be sent to the O&M's engineering department. After reviewing the evaluation provided by the third party, O&M's engineering team will determine if a retest of the sample is required and/or if additional repairs /replacements are needed after the third-party contractor has provided testing results. IP Oberon, LLC and IP Oberon II, LLC are working with O&M to develop a flowchart that depicts this process. IP Oberon, LLC and IP Oberon II, LLC will provide the flowchart to CPUC once it has been approved for use.</p> <p>As a corrective control, IP Oberon, LLC and IP Oberon II, LLC is requiring the O&M area manager to undergo training that focuses on the expectations of weekly technician rounds and the importance of inputting work orders with anything found that is found to be abnormal. A copy of the training sign-off sheet will be provided to CPUC upon completion.</p>	9/25/2025	Training sign-off sheet.

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		As a preventative control, IP Oberon, LLC and IP Oberon II, LLC will require the site team to conduct weekly spot checks of work orders to ensure accuracy of information. To support this, IP Oberon, LLC and IP Oberon II, LLC had its onsite employees add a placeholder on the second to last Wednesday of every month in their calendar to review the EHS portal to confirm that the weekly spot checks of work orders have occurred over the course of the month. Please see the file named "Finding 7&10&12 Verify Monthly PMs and Work Orders".		
11	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.	<p>IP Oberon, LLC and IP Oberon II, LLC are requiring the site team to retrain on the use of the O&M work management system. IP Oberon, LLC and IP Oberon II, LLC will provide a copy of the training sign-off sheet to CPUC once the training has been completed.</p> <p>Additionally, IP Oberon, LLC and IP Oberon II, LLC have confirmed with the O&M that monthly Salesforce training is available for all employees. Please see file named "Finding 11_Monthly Work Management (Salesforce) Training" which shows the monthly training invite.</p>	9/25/2025	Training sign-off sheet for use of work management system
12	Oberon staff must ensure that all inspection documentation is consistently completed, collected, and stored in both physical and digital formats to maintain accurate records.	<p>IP Oberon, LLC and IP Oberon II, LLC have worked with the O&M to ensure inspection documentation is consistently completed, stored and maintained for both physical and digital copies of vehicle inspection reports. Physical copies of these reports will be stored onsite in the O&M building. Digital copies of these reports will be stored in a shared folder in the SharePoint portal for management review. Please see files named "Finding 12_Physical Vehicle Inspection 1" and "Finding 12_Physical Vehicle Inspection 2" for pictures of the binder that resides within the O&M building that will store the physical copies of vehicle inspections. Please see file named "Finding 12_Digital 2025 Vehicle Inspections" for a screenshot of the digital repository that will store electronic copies of vehicle inspections.</p> <p>To ensure this task is consistently completed, IP Oberon, LLC and IP Oberon II, LLC had its onsite employees add a placeholder on the second to last Wednesday of every month in</p>	9/25/2025	Copy of training sign-off sheet

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		their calendar to review that inspections are completed on time and accurately. Please see file named “Finding 7&10&12_Verify Monthly PMs and Work Orders”.		
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Sincerely,

IP OBERON, LLC,
a Delaware limited liability company

By: Nicolas Spicer
Name: Nicolas Spicer
Title: Chief Operating Officer

IP OBERON II, LLC,
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