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

November 10, 2025

Tim Bofman
Director of Plant Operation
8230 Pacific Street
Stanton, CA 90680

SUBJECT: **Energy Storage System Audit of Stanton Battery Energy Storage**
Audit Number ESS2025-03ST

Dear Tim Bofman:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Evan Coughran and Emmanuel Salas of ESRB staff conducted an Energy Storage System audit of Stanton Battery Energy Storage from August 18 through August 20, 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 December 15, 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 Evan Coughran at evan.coughran@cpuc.ca.gov. Please note that although Stanton Battery Energy Storage has 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 Stanton Battery Energy Storage 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 Evan Coughran with a copy to me and the GO-167 inbox GO167@cpuc.ca.gov by December 15, 2025.

Please note that ESRB will also post the Stanton Battery Energy Storage 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 Evan Coughran at evan.coughran@cpuc.ca.gov or (213) 819-6803.

Sincerely,

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

Attachment: CPUC Energy Storage System Audit Findings

Cc: Lee Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy and Water, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Stephen Hur, Senior Utilities Engineer - Supervisor, ESRB, SED, CPUC
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC
Emmanuel Salas, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF
STANTON BATTERY ENERGY STORAGE
AUGUST 18 – AUGUST 20, 2025

I. Findings Requiring Corrective Actions.

Finding 1: Stanton Battery Energy Storage (SBES) has no documented evacuation drill requirement or tracking in the work order management system.

General Order (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 7: Operation Procedures and Documentation states in part:

> *"Operation step wise procedures exist for critical systems and the states of those systems are necessary for the operation of the unit including startup, shutdown, charging, discharging, normal operation, failure detection, alarm response, reasonably anticipated abnormal and emergency conditions, and restoration. Operation procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation…."*

GO 167-C, Appendix D, OS 20: Preparedness for On-Site and Off-Site Emergencies states:

> *"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*
> *b) Trains personnel in the emergency plan periodically*
> *c) Ensures provision of emergency information and materials to personnel"*

During the audit, Electric Safety and Reliability Branch (ESRB) inspectors reviewed SBES's Emergency Action Plan (EAP) (WSM-001) and found no documented requirement for annual evacuation drills. The EAP does not specify the frequency or scope of evacuation drills, and no recurring work order exists in the facility's Work Order Management System to ensure drills are scheduled and completed annually. Without a documented requirement and tracking mechanism,

evacuation drills may be missed, reducing emergency preparedness.

In addition, ESRB inspectors reviewed the facility's evacuation drill forms and found that they do not contain sections to summarize the drill scenario or to document lessons learned and potential improvements. These elements are essential to evaluating drill effectiveness and identifying opportunities to strengthen emergency response capabilities.

SBES must revise the EAP (WSM-001) to include an annual evacuation drill requirement, add the annual evacuation drill as a recurring task in the Work Order Management System, and update the evacuation drill forms to include a "Summary of Scenario" section and a "Lessons Learned/Improvements" section. SBES must submit the revised EAP, updated drill form, and evidence of the work order entry to ESRB for review and verification.

Finding 2: No physical muster point signs posted at designated muster locations.

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."*

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>
> *a) Plans for the continuity of management and communications during emergencies, both within and outside the facility*
> *b) Trains personnel in the emergency plan periodically*
> *c) Ensures provision of emergency information and materials to personnel"*

During the audit, ESRB inspectors observed that although the facility's primary muster point and secondary muster points are identified and labeled on the facility's site map, there is no physical muster point signage installed at the actual muster point locations. Clearly marked muster points are a critical element of an effective emergency response program, ensuring that personnel can quickly locate and gather at designated safe areas during an evacuation. Without physical signage to match the site map, personnel or visitors unfamiliar with the site layout may be delayed in reaching the correct location during an emergency, potentially impacting accountability and safety. SBES must install clearly visible, durable signage at all designated muster points consistent with the facility's site map and provide photographic documentation to

ESRB verifying installation.

Finding 3: No National Fire Protection Association (NFPA) hazard identification placards posted at SBES facility gates.

GO 167-C, Appendix C, Maintenance Standard (MS) 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 C, MS 16: Regulatory Requirements states:

"Regulatory compliance is paramount in the operation of the facility. Each regulatory event is properly identified, reported and appropriate action is taken to prevent recurrence."

GO 167-C, Appendix D, OS 20: Preparedness for On-Site and Off-Site Emergencies states:

"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
b) Trains personnel in the emergency plan periodically
c) Ensures provision of emergency information and materials to personnel"

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 audit, ESRB inspectors observed that SBES has no NFPA hazard identification placards posted at the front or rear gates and that there are no placards leading to the battery storage area. NFPA best practices call for placards to be located at facility entry points and near hazards to provide immediate hazard recognition to emergency responders. The absence of placards could delay emergency response actions and reduce overall site safety. With the nature of battery technology and energy storage it is critical that all first responders understand the risk of what is stored within the facility when they enter the site.

SBES must install NFPA hazard placards within the gates of the facility leading to the battery storage area and at the primary and secondary entrances to the facility. Placards must clearly reflect the highest hazard ratings present on site.

Figure 1: Primary Stanton Energy Reliability Center gate

Figure 2: Secondary rear Stanton Energy Reliability Center gate

<u>Finding 4: Fire extinguisher inspections are not being formally tracked.</u>

GO 167-C, Appendix D, OS 13: Routine Inspections states:

> *"Routine inspections by facility personnel ensure that all areas and critical parameters of facility operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed. Results of data collection and monitoring of parameters during routine inspections are utilized to identify and resolve problems, to improve facility operations, and to identify the need for maintenance. All personnel are trained in the routine inspection*

procedures relevant to their responsibilities. Among other things, each GAO or ESSO creates, maintains, and implements routine inspections by:

a) Identifying systems and components critical to system operation such as, but not limited to, those listed in the guidelines to Operating Standard 28.
b) Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels.
c) Training personnel to conduct routine inspections.
d) Monitoring and conducting trend analysis from routine inspections."

GO 167-C, Appendix D, OS 17: Records of Operation states:

"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."

During the audit, ESRB inspectors observed that while SBES personnel were performing monthly fire extinguisher inspections, these inspections were not formally tracked in a work order system or centralized log. Without formal documentation, continuity of inspections may be compromised in the event of staff turnover. SBES must implement a formal tracking system for all inspections conducted to ensure they are completed.

Finding 5: Training record tracking is incomplete.

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 5: Operations Personnel Knowledge and Skills states:

"Operations personnel are trained and qualified to possess and apply the knowledge and skills needed to perform operations activities that support safe and reliable facility operation."

GO 167-C, Appendix D, OS 6: Training Support states:

"A systematic approach to training is used to achieve, improve, and maintain a high level of personnel knowledge, skill, and performance. Each GAO and ESSO provides a site-specific training program including on-the-job training, covering operations, including reasonably anticipated abnormal and emergency operations.

Personnel are trained to ensure safe and reliable facility operation."

GO 167-C, Appendix D, OS 17: Records of Operation states:

"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."

ESRB inspectors observed that SBES's employee training tracking needs improvement to ensure that all staff receive and maintain all the trainings they require. SBES showed ESRB staff a new system currently in the works that has not been completely rolled out yet. SBES must fully implement a centralized tracking system for all required training, ensuring that records are complete, up to date, and allow management to identify any outstanding trainings.

Finding 6: The Emergency Response Plan (ERP) contains inaccurate shutdown procedure language.

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 7: Operation Procedures and Documentation states:

"Operation step wise procedures exist for critical systems and the states of those systems are necessary for the operation of the unit including startup, shutdown, charging, discharging, normal operation, failure detection, alarm response, reasonably anticipated abnormal and emergency conditions, and restoration. Operation procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures are current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid. Procedure shall be reviewed annually to ensure current procedures are up-to-date and OEM recommendations are implemented."

During the audit, ESRB inspectors reviewed both the Fern ERP and Pacific ERP prepared by Energy Safety Response Group (ESRG). On page 21 of both plans, the plans instruct personnel on actions to take after manual shutdown procedures are completed. However, SBES does not have any manual shutdown procedures because the facility's shutdown process is fully automated. The inclusion of instructions referencing nonexistent shutdown procedures is inaccurate and could cause confusion during an emergency.

SBES must revise the ERP's to clearly state that the facility's shutdown is automated and that no manual shutdown procedures exist. SBES must remove all language referencing manual shutdown procedures from the ERP's and submit the updated plans to ESRB for review and verification.

Finding 7: The California Public Utilities Commission (CPUC) is not listed as an emergency notification contact in the facility's EAP.

GO 167- C, Section 9.4: Safety-Related Incidents states:

> *"Within 24 hours of its occurrence, a GAO or ESSO shall report to the Commission's emergency reporting website any safety-related incident involving a GA or ESS. If internet access is unavailable, the GAO or ESSO may report using the backup telephone system. Such reporting shall include any incident that has resulted in death to a person; an injury or illness to a person requiring overnight hospitalization; a report to Cal/OSHA, OSHA, or other regulatory agency; or damage to the property of the GAO or ESSO or another person of more than $200,000; or involves a GA or ESS malfunction or failure resulting in fires, explosions, hazardous emissions, or safety related reports to other agencies. The GAO or ESSO shall also report any other incident involving a GA or ESS that has resulted in significant negative media coverage (resulting in a news story or editorial from one media outlet with a circulation or audience of 50,000 or more persons) when the GAO or ESSO has actual knowledge of the media coverage. If not initially provided, a written report also will be submitted within five business days of the incident. The report will include copies of any reports concerning the incident that have been submitted to other governmental agencies."*

During the audit, ESRB inspectors reviewed SBES's EAP (WSM-001) and noted that the emergency notification contact list does not include the CPUC as required contact. GO 167-C Section 9.4 requires that Generating Asset Owners (GAO) and Energy Storage System Owners (ESSO) report qualifying incidents to the CPUC within 24 hours, and the absence of the CPUC from the facility's emergency notification contact list could delay required reporting. SBES must update the EAP (WSM-001) to add the CPUC to the emergency notification contact list. The update must ensure personnel have immediate access to the CPUC's emergency reporting website address and backup telephone number so that all reportable incidents are communicated in compliance with GO 167-C.

ESRB inspectors also found that SBES ERP does not have any information regarding CPUC's safety incident reporting requirements. SBES must include the reportable safety incident criteria in its ERP and train its employees to become knowledgeable about safety incident criteria, reporting requirements, and how to report safety incidents to the CPUC. SBES must also train and inform its staff of any changes made to EAP (WSM-001). SBES must submit the revised document to ESRB for review and verification.

Finding 8: No spare parts inventory has been performed since start of operations.

GO 167-C, Appendix C, MS 2: Organizational Structure and Responsibilities states:

> *"The organization with responsibility and accountability for establishing and implementing a maintenance strategy to support company objectives for reliable facility operation is clearly defined, communicated, understood, and is effectively implemented. Reporting relationships, control of resources, and individual authorities support and are clearly defined and commensurate with responsibilities."*

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

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

GO 167-C, Appendix C, MS 12: Spare Parts, Material and Services states:

> *"Correct parts and materials are in good condition and are available for maintenance activities to support both forced and planned outages. Procurement of services and materials for outages are completed on time to ensure materials will be available without impact to the schedule. Storage of parts and materials support maintaining quality and shelf life of parts and material."*

During the audit, ESRB inspectors found that SBES staff have not performed any spare parts inventory for SBES since the start of operations in 2023. Facility staff confirmed that no inventory has been conducted for 2023, 2024, or 2025. Failure to perform and document annual inventories can result in inaccurate equipment records, missing or unserviceable parts, and reduced operational readiness. SBES staff must ensure that an inventory is performed on an annual basis and must add this requirement into the facility's Work Order Management System to ensure it is scheduled and completed each year. SBES must also provide ESRB with documentation confirming that the 2025 inventory has been completed.

Finding 9: Multiple hazardous waste accumulation area checklists.

GO 167-C, Appendix D, OS 7: Operation Procedures and Documentation states:

> *"Operation step wise procedures exist for critical systems and the states of those systems are necessary for the operation of the unit including startup, shutdown, charging, discharging, normal operation, failure detection, alarm response, reasonably anticipated abnormal and emergency conditions, and restoration. Operation procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures are current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid. Procedure shall be reviewed annually to ensure current procedures are up-todate and OEM recommendations are implemented."*

GO 167-C, Appendix D, OS 17: Records of Operation states:

> *"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."*

A Hazardous Waste Accumulation Area Checklist is included in the Hazardous Materials Business Plan (WSM-002), even though the checklist is already maintained under the SBES Spill Prevention Control Plan (SPCC). Maintaining the checklist in two separate locations can create confusion and potential inconsistencies in recordkeeping. SBES must remove the Hazardous Waste Accumulation Area Checklist from the Hazardous Materials Business Plan (WSM-002) and ensure that all references and procedures for hazardous waste accumulation are consolidated under the SPCC plan. Documentation should be updated to reflect this change.

Finding 10: Calibration and inspection of Personal Protective Equipment (PPE) is not documented in the work order management system.

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."*

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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."*

GO 167-C, Appendix D, OS 17: Records of Operation states:

> *"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."*

Calibration and inspection records for PPE are not documented in the Work Order Management System as required by their Hazardous Materials Business Plan (WSM-002). Without formal documentation in the system, management cannot verify that PPE has been properly inspected, calibrated, or maintained, potentially compromising worker safety. SBES must ensure that all PPE calibration and inspection activities are recorded in the Work Order Management System per Hazardous Materials Business Plan (WSM-002), and that records are routinely reviewed.

Finding 11: Hazardous materials inventory list missing.

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 17: Records of Operation states:

> *"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."*

SBES does not currently maintain a complete inventory list of all hazardous materials on site as required by their Hazardous Materials Business Plan (WSM-002). SBES must develop and maintain a centralized, up-to-date inventory of all hazardous materials on site in accordance with their Hazardous Materials Business Plan (WSM-002). SBES must review their documentation and ensure that they are followed or updated to match Plant procedures.

Finding 12: Contractor performance is not being formally verified and documented.

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

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

GO 167-C, Appendix D, 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."

GO 167-C, Appendix D, OS 17: Records of Operation states:

"The GAO or ESSO assures that data, reports, and other records reasonably necessary for ensuring proper operation and monitoring of the GA or ESS are collected by trained personnel and retained for at least five years, and longer if appropriate."

SBES does not consistently verify and document contractor performance in accordance with Section 5.4.8 of their Contractor Performance procedure. SBES must follow implemented procedures requiring staff to review and document contractor performance for all work conducted, including a sign-off confirming that tasks are complete and meet established standards. Documentation must be maintained for verification.

II. List of Reviewed Documents

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors**
	2	Emergency Response and Emergency Action Plan
	3	Evacuation Map and Plant Layout
	4	Records Demonstrating Coordination with Local Agencies in the Development of the ERP and EAP.
	5	Evacuation Drill Report and Critique (last 3 years)
	6	Records of Emergency Trainings, Table-Top Exercises, and Drills Involving Local First Responders or Other External Agencies
	7	Hazmat Handling Procedures
	8	SDS for All Hazardous Chemicals
	9	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	10	OSHA Form 300 (Injury Log) and OSHA Form 301 (Incident Report) (last 4 years)
	11	List of all CPUC Reportable Incidents (last 5 years)***
	12	Fire Protection System Test Report and Inspection Record (5 years)
	13	Insurance Report / Loss Prevention / Risk Survey (last 5 years)
	14	Lockout / Tagout Procedure (last 3 revisions, if applicable)
	15	Arc flash Analysis
	16	Emergency Shutdown or Battery Discharge Protocol
	17	Plant Physical Security and Cyber Security Procedures and Records
	18	Job Safety Analysis Program**
Employee Training	19	Safety Training Records*
	20	Skill-related Training Records*
	21	Certifications for Electrical, Welders, Forklift & Crane Operators*
	22	Hazmat Training Records *
Contractors	23	Latest list of Qualified Contractors*
	24	Contractor Selection / Qualification Procedure
	25	Contractor Certification Records
	26	Contractor Monitoring Program
	27	BESS Maintenance Contract and Operations and Monitoring Contract
	28	BESS Building Construction Contractor Information
Regulatory	29	Air Permit
	30	Water Permit
	31	Spill Prevention Control Plan (SPCC)
	32	Construction Permitting Documents from permitting organizations
	33	Commissioning Documentation (Inspection reports)

O&M	34	Daily Round Sheets / Checklists
	35	Logbook**
	36	List of Open/Backlogged Work Orders*
	37	List of Closed/Retired Work Orders (last 2 years)*
	38	Open/Backlogged Contractor Issues or Tickets
	39	Work Order Management Procedure (last 3 revisions, if applicable)
	40	Computerized Maintenance Management System (Demonstration onsite)**
	41	SCADA system (Demonstration onsite)**
	42	All Root Cause Analyses (if any)
	43	Emergency Generator Test and Maintenance Records (last 5 years)
	44	Substation Battery Test and Maintenance Records (last 5 years)
	45	Maintenance and Inspection Records for Switchgear/breaker/relays
	46	Building HVAC inspection and maintenance records
Battery Energy Storage System	47	Capacity Testing Records and Procedure
	48	Round Trip Efficiency Test Records and Procedure
	49	Thermal Management System Inspection Records
	50	Battery Management System (Rack and Module) Maintenance and Calibration Records
	51	Battery Protection Unit Inspection and Calibration Records
	52	Battery Health Assessment Report and Procedure
	53	Failure Modes and Effects Analysis (FMEA) or Hazard Analysis
	54	Underwriters Laboratory 9540A Test Reports
BESS Fire Suppression System	55	BESS Fire Suppression System Requirements
	56	BESS Fire Suppression System Inspection, Maintenance, and Testing Records
	57	BESS Fire Suppression System As Built Drawings and Schematics
	58	Operations and Monitoring Setup of the BESS Fire Suppression System (Onsite Demonstration)**
	59	BESS Fire Suppression System Integration with Fire Alarm Panel Design Records or Manuals
	60	BESS Fire Suppression System Standard Operating Procedure or Control Room User Manual
Transformers	61	Medium Voltage Transformer Maintenance and Inspection Records
	62	Maintenance and Inspection Records for Main Transformer(s)
	63	Hot Spots / IR Inspection Reports
	64	Dissolved Gas Analysis Reports
Instrumentation	65	Instrument Calibration Procedures and Records
	66	Fire, Heat, Gas, and Smoke Detection Calibration and Test Records
Test Equipment	67	Calibration Procedures and Records
Documentation	68	Records of all system outages greater than 50 MWs and longer than 72 hours
	69	Record of Thermal Runaway Events
	70	Module or Rack level Electrical Schematics

	71	As-Built Construction Drawings including Single Line Diagram
	72	OEM BESS Data/Specification Sheet
	73	Vendor Manuals (BESS, BMS, Inverter)
Spare Parts	74	Spare Parts Inventory List
	75	Shelf-life Assessment Report
Management	76	Employee Performance Review Procedures and Verifications
	77	Organizational Chart
Internal Audit	78	Internal Audit Procedures and Records

Note: If a 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.