

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



June 30, 2026

Gil Makabenta
Regional Solar Site Manager & ES I
Blythe Solar III, IV &
BESS 110, II, III IV

**SUBJECT: General Order (GO) 167-C Audit of Blythe Solar III, IV & BESS 110, II, III IV,
Audit Number GA2026-06BS**

Dear Gil Makabenta:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emmanuel Salas, Evan Coughran, Emanuel Pineda, Jose Chavez, and Daniel La Bella of ESRB staff conducted a Generation and Energy Storage audit of Blythe Solar III, IV & BESS 110, II, III IV from May 4 through May 7, 2026.

During the audit, ESRB observed facility 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 July 29, 2026, 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 Blythe Solar III, IV & BESS 110, II, III IV have 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 Blythe Solar III, IV & BESS 110, II, III IV 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 July 29, 2026.

Please note that ESRB will also post the Blythe Solar III, IV & BESS 110, II, III IV 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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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,

A handwritten signature in black ink, appearing to read "Stephen Hur", is written over a horizontal line.

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

Cc:

Lee Palmer, Deputy Executive Director of Safety Enforcement, Safety Policy, and Water, CPUC
Koko Tomassian, Director, Safety Enforcement Division (SED), CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
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Jose Chavez, Utilities Engineer, ESRB, SED, CPUC
Daniel La Bella, Public Utilities Regulatory Analyst, ESRB, SED, CPUC

**CPUC AUDIT FINDINGS OF
BLYTHE SOLAR III, IV &
BLYTHE ENERGY STORAGE 110, II, III, IV
MAY 4 – MAY 7, 2026**

I. Findings Requiring Corrective Actions.

Finding 1: Inspection, testing, and maintenance (ITM) records were not provided for the installed Blythe Energy Storage II manual dry-type fire protection system.

General Order (GO) 167-C, Appendix C, Maintenance Standard (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, Operation Standard (OS) 13: Routine Inspections states in part:

“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.”

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.”

California Fire Code (CFC) 2025, Section 901.6: Inspection, Testing and Maintenance states in part:

“Fire protection and life safety systems shall be maintained in an operative condition at all times, and shall be replaced or repaired where defective. Nonrequired fire protection and life safety systems and equipment shall be inspected, tested and maintained or removed in accordance with Section 901.8.”

National Fire Protection Association (NFPA) 25, Section 5.2.1.1 states:

“Sprinklers shall be inspected from the floor level annually.”

NFPA 25, Section 13.8.1 states:

“Fire department connections shall be inspected quarterly...”

During the documentation review, Electric Safety and Reliability Branch (ESRB) auditors reviewed the construction drawings and the Operations and Maintenance (O&M) Manual for the installed Blythe Energy Storage II fire protection system. The submitted construction drawings state that the system design, materials, and installation conform to NFPA 13 and identify the

system as a manual dry-type fire protection system requiring the fire department to supply water to the piping system in the event of a fire. The O&M Manual identifies the installed fire protection discharge devices as spray nozzles, states that the owner is responsible for maintaining the fire protection system and devices in proper operating condition, and references NFPA 25 for ITM requirements.

ESRB auditors requested ITM records for the installed Blythe Energy Storage II manual dry-type fire protection system but Blythe Solar III & IV and Blythe Energy Storage 110, II, III, IV (Blythe) personnel did not provide records demonstrating that the system, including the spray nozzles, the fire department connections (FDCs), and associated components had been inspected, tested, or maintained in accordance with the applicable NFPA 25 and O&M Manual requirements.

Routine ITM records are necessary to verify that installed fire protection system components remain available and in proper operating condition. Blythe must provide any available historical ITM records for the installed Blythe Energy Storage II manual dry-type fire protection system. If historical ITM records are unavailable, Blythe must provide a written explanation identifying why the records are unavailable. Blythe must also provide a corrective action plan describing how the system will be inspected, tested, and maintained going forward. The corrective action plan must identify the system component, inspection and testing frequency, responsible personnel or contractor, recordkeeping process, and management controls to ensure future ITMs are completed and documented. Additionally, Blythe must submit the first completed ITM record after implementation of the corrective action plan to ESRB for review and verification.



Figure 1: One of the FDCs for the Blythe Energy Storage II manual dry-type fire protection system.

Finding 2: The Emergency Action Plan (EAP) does not accurately identify site-specific Battery Energy Storage System (BESS) fire protection systems.

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

“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.”

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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of the ESS facility shall submit the emergency response and emergency action plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”*

During the documentation review, ESRB auditors reviewed the SMS 237, Blythe, McCoy Solar, Arlington EAP. Appendix 2, Attachment 1, List of Major Fire Hazards, identifies “BESS battery thermal runaway” as a major fire hazard for “All BESS locations”. The attachment states that the fire protection for this hazard consists of “NOVEC strips integrated into battery modules design and construction”. However, this description does not accurately reflect the fire protection mechanisms installed at each Blythe, McCoy, and Arlington BESS locations. The NOVEC-strip description applies to the Samsung battery systems. However, other Blythe BESS sites have different fire protection configurations. For example, Blythe Energy Storage II, which is a Samsung battery system, has a dry pipe system in addition to NOVEC strips. Similarly, Blythe Energy Storage IV is a CATL battery system and does not use NOVEC-strips at all. As written, Appendix 2, Attachment 1 describes a single fire protection configuration for all BESS locations,

even though the fire protection mechanisms can vary by site.

Emergency response documents must accurately describe site-specific fire protection systems, so facility personnel and emergency responders understand the fire protection features available at each BESS location. Inaccurate or generalized descriptions of fire protection mechanisms may create confusion during emergency planning or response activities and reduce the effectiveness of the EAP as an emergency preparedness document.

Blythe must revise Appendix 2, Attachment 1 of the EAP to accurately identify the fire protection mechanisms installed at each Blythe Energy Storage location. Blythe must verify the revised information against as-built documentation and maintain a documented basis for the fire protection descriptions included in the EAP. Blythe must submit the updated EAP and supporting documentation to ESRB for review and verification.

Finding 3: Missing and Inaccurate Failure Modes and Effects Analyses (FMEA) for Blythe Energy Storage Facilities

GO 167-C, Appendix C, MS 14: Engineering and Technical Support states:

“Engineering and technical support activities are conducted such that equipment performance is optimized for reliable facility operation. Engineering and technical support implements industry best practices, lessons learned, proven safety measures, and technical information necessary for the facility to be operated and maintained within the operating parameters defined by facility design.”

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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of the ESS facility shall submit the emergency response and emergency action plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”*

California Fire Code (CFC) 2019, Section 1206.1.4: Hazard mitigation analysis states:

“A failure modes and effects analysis (FMEA) or other approved hazard mitigation analysis shall be provided in accordance with Section 104.7.2 under any of the following conditions:

- 1. Where ESS technologies not specifically identified in Table 1206.1 are provided.*
- 2. More than one ESS technology is provided in a room or enclosed area where there is a potential for adverse interaction between technologies.*
- 3. Where allowed as a basis for increasing maximum allowable quantities. See Section 1206.5.2.”*

CFC 2025, Section 1107.1: Lithium-ion technology energy storage systems states:

“The owner of an energy storage system (ESS) utilizing lithium-ion battery technology having capacities exceeding the values in Table 1207.1.3 and installed prior to the jurisdiction’s adoption of the 2018 or later edition of the California Fire Code shall provide the fire code official a failure modes and effects analysis (FMEA) or other approved hazard mitigation analysis in accordance with Section 104.2.2 for review and approval.”

During the documentation review, ESRB auditors requested FMEAs for Blythe Energy Storage 110, Blythe Energy Storage II, Blythe Energy Storage III, and Blythe Energy Storage IV. Blythe provided FMEAs for Blythe Energy Storage II and Blythe Energy Storage IV, however, Blythe did not provide an FMEA, approved hazard mitigation analysis, or other documentation for Blythe Energy Storage 110 or Blythe Energy Storage III.

The FMEA provided for Blythe Energy Storage II was not dated and did not clearly identify the facility or revision status. In addition, equipment and system information listed in the FMEA did not match as-built or field-verified conditions. For example, the FMEA listed Samsung E2D Modules, Power Electronics FP3000K inverters, and a Fike/FM-200 fire suppression configuration. However, the as-built documentation identified Samsung E4D Modules, Power Electronics FP3430M inverter/transformer units, and a manual dry-type fire protection system. The FMEA did not properly reflect the installed Blythe Energy Storage II configuration.

The FMEA provided for Blythe Energy Storage IV also contained incomplete and potentially inconsistent equipment information. The FMEA listed a CATL battery system but identified the fire protection components as a Fike fire protection system and FM-200 tank. The CATL operating manual identifies the fire protection components as including a fire suppression control panel, smoke detectors, and gas detectors. The FMEA also listed a Bard 6-ton HVAC unit with the model identified as “TBD” and listed the temperature probe conformity status as “Undetermined.” However, the CATL operating manual describes the battery container thermal management system as a liquid-cooled system with two cooling units/chillers per container.

Missing, incomplete, or inaccurate FMEAs reduce Blythe’s ability to demonstrate that facility-specific failure modes, system vulnerabilities, thermal management functions, fire protection systems, and hazard mitigation measures have been adequately evaluated based on the actual

equipment installed at each site. Inaccurate hazard analysis documentation may also affect emergency planning.

Blythe must provide a current, site-specific FMEA for each Blythe Energy Storage facility. The documentation must identify the applicable facility, include the revision date and approval status, define the scope of the analysis, and accurately reflect the installed ESS equipment, battery system, inverter/transformer configuration, fire protection systems, thermal management systems, and applicable hazard mitigation measures. Blythe must submit the updated analyses, supporting documentation, and any applicable AHJ approval records to ESRB for review and verification.

Finding 4: Dracker substation control house Exhaust Fan switches were found in the off position.

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 8: Plant Status and Configuration 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.”

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

“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.”

During the Dracker substation inspection, ESRB auditors observed that the switches for Exhaust Fans EF-1 and EF-2 in the Dracker Substation control house were in the “off” position instead of the “auto” position. The exhaust fans are intended to provide ventilation for the Vented Lead-Acid (VLA) battery banks in the control house and operate on a timer to help prevent the accumulation of gases. With the switches in the “off” position, the exhaust fans cannot operate as intended. Proper operation of the exhaust fans is necessary to support substation control house ventilation and reduce the potential for hydrogen or other gases to accumulate in the control house. Exhaust fan switches left in the “off” position may prevent the ventilation system from performing its intended function and may reduce the effectiveness of the facility’s safety controls.

Blythe must place the exhaust fan switches in the proper operating position and verify that EF-1

and EF-2 operate as intended in automatic mode. Blythe must also implement a process to routinely verify that the exhaust fan switches remain in the proper position and submit documentation to ESRB showing that the switches were corrected, fan operation was verified, and the verification process was implemented.

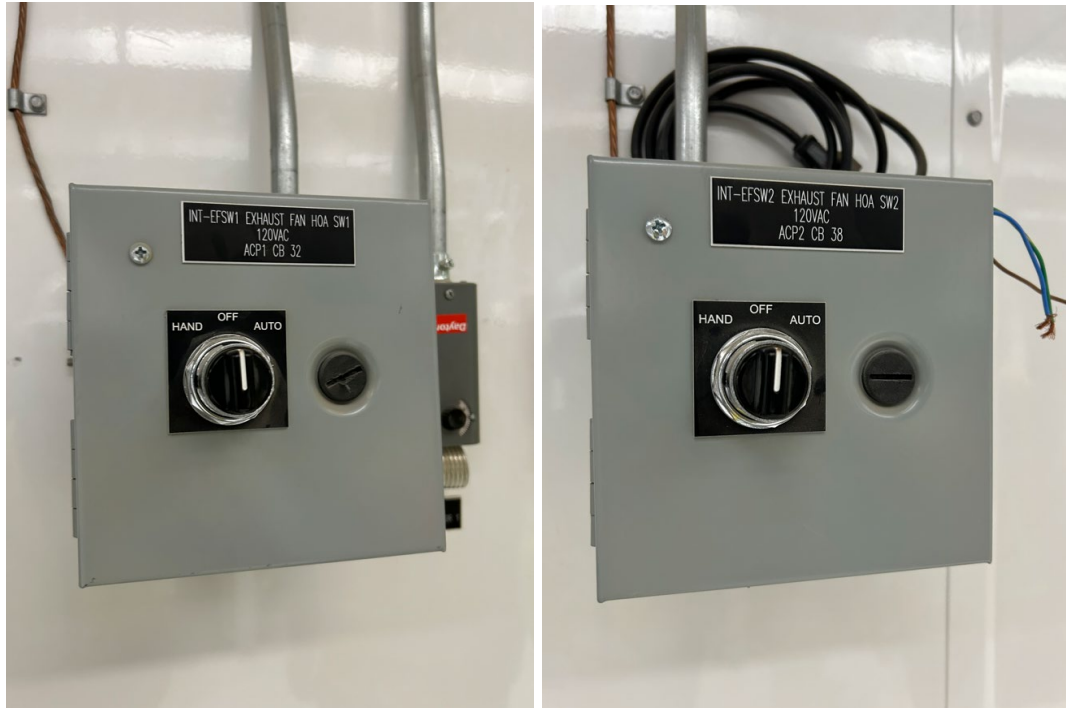


Figure 2: The switches for the Dracker Substation control house exhaust fans EF-1 (left) and EF-2 (right) in the off position.

Finding 5: Dust emissions contact sign was not fully legible.

GO 167-C, Appendix C, 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, OS 10: Environmental Regulatory Requirements states:

“Environmental regulatory compliance is paramount in the operation of the facility. Each regulatory event is identified, reported and appropriate action taken to prevent recurrence.”

Mojave Desert Air Quality Management District (MDAQMD) Dust Control Plan Authorization DCP000154, Requirement 2 states:

“The o/o shall install and maintain signage in accordance with Rule 403 Attachment B and as approved by the Air Pollution Control Officer (APCO).”

During the site inspection, ESRB auditors noted that the dust emissions contact sign required by

the facility's Dust Control Plan Authorization was not fully legible due to sun fading. Specifically, the *"IF YOU SEE DUST COMING FROM THIS SITE CALL"* line and the *"If You Do Not Receive a Response, Please Call The Mojave Desert AQMD at 1-800-635-4617"* line were faded and difficult to read.

The dust emissions contact sign provides the public with contact information for reporting fugitive dust emissions or trackout from the facility. If required sign language is not legible, the sign may not effectively communicate required reporting information and may not demonstrate that the facility is maintaining the sign in accordance with its Dust Control Plan Authorization. During the audit, Blythe personnel touched up and repaired the dust emissions contact sign. Blythe must implement a process to periodically inspect and maintain required environmental signage to ensure that all required information remains legible and accurate. Blythe must submit documentation to ESRB describing how it will implement a process for inspecting and maintaining required environmental signage for review and verification.



Figure 3: The permit-required dust emissions contact sign with illegible text.



Figure 4: The fixed permit-required dust emissions contact sign.

Finding 6: Insufficient completion and recordkeeping of emergency drill critiques and performance documentation.

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 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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of*

the ESS facility shall submit the emergency response and emergency action plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”

ESRB auditors found that drill critiques are not being consistently completed or documented, which includes missing sign-in sheets, incomplete drill evaluations, the absence of identified areas for improvement, and missing recordkeeping of drill response times. This lack of documentation can prevent the facility from evaluating the effectiveness of its emergency drills, identifying weaknesses, and ensuring that personnel are properly trained to respond to emergency conditions. Blythe must ensure that every drill is thoroughly documented with a complete critique, sign-in sheet, assessment of response actions, areas of improvement, and response time.

Finding 7: The EAP Section 8.7 does not address documentation of real emergencies as drills or require nighttime drills.

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”

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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of the ESS facility shall submit the emergency response and emergency action*

plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”

During the documentation review, Blythe personnel informed ESRB auditors that the facility uses real incident events, or considers real incident events, to satisfy its quarterly emergency drill requirements. However, the EAP does not identify whether actual incidents may be credited toward the quarterly emergency drill requirement or describe the documentation, evaluation, or lessons-learned requirements for counting those incidents as drills.

The EAP also lacks a requirement for conducting night-time drills, even though Blythe personnel informed ESRB auditors during staff interviews that nighttime work is commonly performed at the facility. Blythe did not provide records demonstrating that nighttime drills have been conducted. Failing to incorporate nighttime drills in a facility in which nighttime work is common may prevent Blythe personnel from being properly trained for reasonably anticipated emergencies.

Blythe must update EAP Section 8.7 to clearly state quarterly drill criteria and what drills and scenarios qualify. The EAP must clearly state what actions must be conducted and recorded to be qualified as a documented drill. Blythe must also incorporate night-time drill requirements to safely and effectively respond during night-time work conditions. Blythe must submit the updated EAP and a plan of action for conducting and documenting nighttime drills to ESRB for review and verification.

Finding 8: Overgrown vegetation is creating potential fire and access hazards near combiner boxes.

GO 167-C, Appendix C, MS 1: Safety states:

“The protection of life and limb for the work force is paramount. The company behavior ensures that individuals 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 individuals are consistent with the policies and procedures.”

GO 167-C, Appendix C, MS 13: Equipment Performance and Material Condition states:

“Equipment performance and material condition support reliable facility operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems, corrosion, and degradation.”

GO 167-C, Appendix C, MS 18: Maintenance Facilities and Equipment states:

“Facilities and equipment are adequate to effectively support maintenance activities.”

ESRB auditors noted significant vegetation growth in multiple areas of the facility which includes overgrown vegetation surrounding combiner boxes. This level of vegetation poses both

a safety and operational concern, as tall, dry plant material can increase fire risk, obstruct access to electrical equipment and hinder routine inspections and maintenance activities. Blythe must ensure that vegetation control measures are being consistently implemented, including routine inspections and timely clearing of overgrown areas, particularly around energized components such as combiner boxes. Regular vegetation management can reduce fire hazards and support facility safety and reliability. Blythe must submit a plan of action to ESRB for inspecting and addressing overgrown vegetation around energized equipment.



Figure 5: Overgrown vegetation around a combiner box.

Finding 9: Generator Step Up (GSU) transformer T2 has evidence of an oil leak.

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

“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.”

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 13: Equipment Performance and Material Condition states:

“Equipment performance and material condition support reliable facility operation. This

is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems, corrosion, and degradation.”

During the Dracker substation inspection, ESRB auditors observed evidence of an oil leak on GSU Transformer T2. Transformer oil is necessary to support transformer cooling, insulation, and reliable equipment operation. Unaddressed transformer oil leaks may indicate equipment degradation, create housekeeping concerns, and reduce the facility’s ability to maintain equipment material condition.

During the audit, Blythe personnel entered a work order for the GSU Transformer T2 oil leak into its work order management system. Blythe must provide ESRB with a plan of action and estimated completion timeline for addressing the GSU Transformer T2 oil leak. After completing the corrective action, Blythe must submit documentation demonstrating that the condition was resolved and closed out through its work management process.



Figure 6: GSU Transformer T2 with evidence of an oil leak.

Finding 10: One cooling fan on GSU Transformer T4 did not operate when tested.

GO 167-C, Appendix C, 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 C, MS 13: Equipment Performance and Material Condition states:

“Equipment performance and material condition support reliable facility operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems, corrosion, and degradation.”

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.”*

During the Dracker substation inspection, ESRB auditors requested that Blythe personnel run the GSU Transformer cooling fans located below the transformer cooling fins as a method of functional testing. During the test of the cooling fans on GSU Transformer T4, it was observed that one fan on the outer side of the fan bank did not operate.

A non-operational cooling fan can reduce the transformer’s cooling capacity because sufficient airflow is essential for dissipating heat generated during normal transformer loading. Without proper cooling, heat may accumulate within the unit and contribute to insulation degradation, reduced equipment lifespan, reduced transformer efficiency, and other equipment reliability issues. Proper cooling fan performance is necessary to support safe and reliable transformer operation.

Blythe must repair or replace the inoperable cooling fan and conduct regular maintenance inspections on all GSU Transformer cooling fans to ensure they are functioning properly. Routine inspections and testing of transformer cooling fans can help identify malfunctioning fans and help support reliable transformer operation. Blythe must submit documentation to ESRB demonstrating that the GSU Transformer T4 cooling fan has been repaired or replaced and that proper operation has been verified. Blythe must also provide work orders and documentation demonstrating that GSU Transformer cooling fan testing has been added to routine inspections and is being completed regularly.

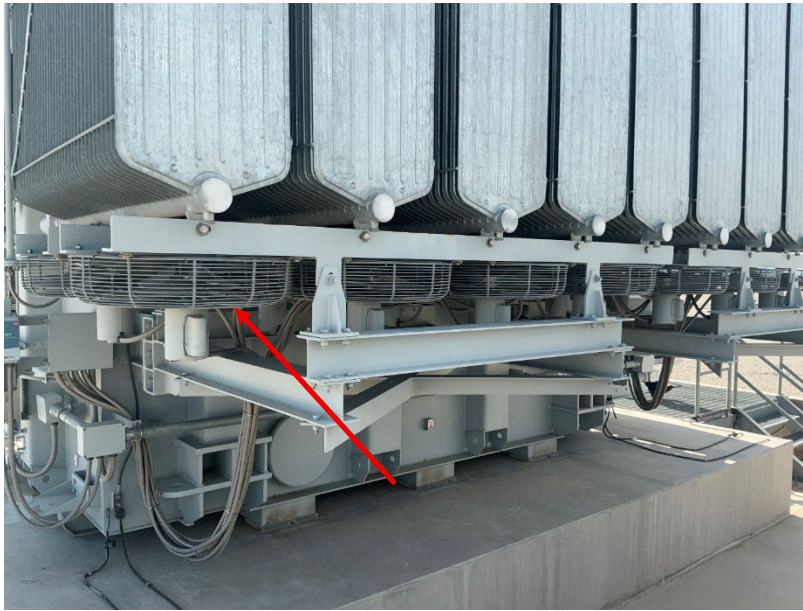


Figure 7: Inoperable cooling fan on GSU Transformer T4 identified during functional testing.

Finding 11: GSU Transformer T1 had a disconnected and dangling grounding wire.

GO 167-C, Appendix C, MS 1: Safety states:

“The protection of life and limb for the work force is paramount. The company behavior ensures that individuals 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 individuals are consistent with the policies and procedures.”

GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:

“Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation.”

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.”*

During the field inspection of the Dracker substation, ESRB auditors noted that GSU Transformer T1 had a grounding cable that was disconnected and hanging loose. Blythe personnel stated that the cable was no longer needed because a neutral ground reactor had been installed in its place. Ground cables are an integral part of electrical systems and should not be removed from service without proper justification and engineering analysis. Additionally, a loose conductor can pose mechanical hazards, interfere with equipment, or give the false appearance of incomplete grounding, creating confusion during maintenance or emergency response activities.

Blythe must provide ESRB with appropriate documentation, such as an engineering analysis, technical justification, the applicable OEM manual, and the relevant single-line diagrams demonstrating the installation of the neutral ground reactor. If the ground cable is confirmed to be obsolete based on this documentation, it must be fully removed.



Figure 8: GSU for Blythe 1 with a dangling/disconnected ground wire (left). Close-up view of the dangling/disconnected ground wire (right).

Finding 12: EAP muster point maps and terminology are inconsistent

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

“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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of the ESS facility shall submit the emergency response and emergency action plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”*

During the documentation review, ESRB auditors reviewed the SMS 237, Blythe, McCoy Solar, EAP. The EAP includes multiple references to emergency muster locations. However, the EAP maps and related language did not consistently identify the primary muster point, secondary muster point, and off-site muster point. Section 8.7, Item 7 of the EAP states that every site should have an identified off-site muster area, and Appendix 10 states that the primary muster area must be predetermined and that alternate muster areas should be selected when egress routes to the primary muster area are unsafe.

ESRB auditors noted that Appendix 12 and related EAP language use inconsistent terminology for muster locations. The Appendix 12 map identifies the “O&M” as the Primary Muster Point and identifies an Alternate Muster Point along Black Rock Road, which is located off site. However, the map in Appendix 2 identifies the “Admin Building” as the Primary Muster Point and the McCoy Main Gate as the Secondary Muster Point and does not mention an offsite muster point. The Appendix 12 narrative also refers to the Primary Muster Area as “the McCoy Operations and Maintenance Building Parking Lot” and the Alternate Muster Area as the

“McCoy Solar Main Access Gate”.

These differences create uncertainty regarding which location is the primary muster point, which location is the secondary or alternate muster point, and which location serves as the required off-site muster point. Accurate and consistent muster point information is necessary to support effective emergency response, evacuation, and personnel accountability. Inconsistent terminology or map references may cause confusion during an emergency and may delay personnel evacuation to the designated muster location.

During the audit, Blythe revised the EAP maps to address the identified muster point inconsistencies. Blythe must review related facility materials, including the contractor and visitor orientation and other documents containing site maps and muster point information, to verify that all muster point terminology and locations are accurate and consistent with the revised EAP. Blythe must submit documentation confirming that this review was completed and that all related documents were updated as needed for review and verification. Blythe must also submit the revised EAP to ESRB.

Finding 13: Orientation materials contain incomplete and illegible information.

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 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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with*

Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of the ESS facility shall submit the emergency response and emergency action plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”

During the documentation review, ESRB auditors observed that the orientation printout used at Blythe contained a blurry site map that is difficult to read, despite a higher quality version being available within the orientation materials. Auditors also noted that the document contains placeholder statements that were not finalized and that the “Onsite Chemicals” section header did not contain any information beneath it. Orientation materials are intended to provide personnel and visitors with clear, accurate, and complete site-specific information necessary to support safe operations and emergency preparedness. Incomplete or unclear orientation materials may reduce personnel understanding of site hazards, emergency procedures, and facility layout.

During the audit, Blythe personnel updated the orientation materials to address the identified deficiencies, including replacing the site map with a higher quality version and correcting incomplete sections. While these actions resolved the immediate concerns, the need to revise the orientation materials during the audit indicates that the documents were not being routinely reviewed and updated to ensure accuracy prior to distribution. Blythe must ensure that orientation documents remain current, accurate, complete, and ready for use at all times.

Finding 14: Fire extinguisher inspection tags were missing, outdated, or incomplete at multiple 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.”

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.”*

During the field inspection, ESRB auditors observed multiple instances of fire extinguisher inspection deficiencies. ESRB auditors observed a forklift in Blythe Energy Storage II yard equipped with two fire extinguishers. One extinguisher was missing its inspection tag, and the other had an outdated inspection tag from 2021. Additionally, ESRB auditors observed a fire extinguisher at the Dracker substation control house with an outdated inspection tag, missing monthly inspection entries, and an expired annual inspection card attached.

Fire extinguishers must be inspected at the required frequency, and inspection documentation must be properly maintained. Missing, outdated, or incomplete inspection tags limit the facility's ability to demonstrate that fire extinguishers have been inspected and remain in proper working condition in the event of an emergency. Without proper inspection documentation, the facility may not be able to readily verify that extinguisher inspections are being performed consistently and that identified issues are being tracked and corrected.

Blythe personnel inspected and documented the Dracker Substation control house fire extinguisher during the audit. Blythe must verify that the fire extinguishers on the forklift are properly inspected and in proper working conditions, ensure that inspections are properly documented on the inspection tags, and remove and replace any extinguishers found to be in improper condition. Blythe must also ensure that any fire extinguishers on mobile equipment and in facility buildings are inspected at the required frequency. Blythe must submit documentation of the completed corrective actions, along with the process for conducting routine fire extinguisher inspections to ESRB for review and verification.



Figure 9: Fire extinguisher on forklift missing inspection tag (Left). Fire extinguisher on forklift with an outdated inspection tag showing last inspection in 2021 (Right).



Figure 10: Fire extinguisher tag showing an outdated year, marked for 2025 but not 2026 (left). Reverse side of the tag showing a missed inspection for March 2025 (right).



Figure 11: Inspected fire extinguisher in the Dracker Substation control house.

Finding 15: Exit sign in the substation control room was not functioning properly.

GO 167-C, Appendix C, 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, 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 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 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;*
- d) In developing any emergency plans, the GAO and ESSO will coordinate with local emergency management agencies, unified program agencies, and local first response agencies; and*
- e) The owner or operator of each ESS facility shall develop and submit an emergency response and emergency action plan for the ESS that complies with Public Utilities Code, Section 761.3, subdivision (g). The owner or operator of the ESS facility shall submit the emergency response and emergency action plan to the county, local emergency management agencies, local first response agencies, and if applicable, the Authority Holding Jurisdiction (AHJ) and the city where the facility is located.”*

During the Dracker substation inspection, ESRB auditors observed that an illuminated exit sign in the Dracker substation control house did not illuminate when tested. Functional exit signage is necessary to support safe emergency egress by clearly identifying exit routes during emergency conditions, including a loss of normal lighting. A non-functional exit sign may delay evacuation and reduce the ability of personnel to safely exit the area during an emergency situation. Blythe must perform routine inspections and functional testing of emergency lighting and exit signage to ensure deficiencies are identified and corrected before equipment becomes unavailable during an emergency. Blythe personnel fixed the malfunctioning sign during the audit.



Figure 12: Non-functional exit sign in the substation control house(left). Repaired and functional exit sign (right).

Finding 16: Safety Data Sheets (SDS) sheets are outdated versions.

GO 167-C, Appendix C, MS 1: Safety states:

“The protection of life and limb for the work force is paramount. The company behavior ensures that individuals 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 individuals are consistent with the policies and procedures.”

GO 167-C, Appendix C, MS 8: Maintenance Procedures and Documentation states:

“Maintenance procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.”

During the documentation review, ESRB auditors identified that multiple SDS’s provided by Blythe were outdated, despite newer revisions being available. The use of outdated SDS presents a safety and compliance risk, as these documents contain critical information necessary for effective response during incidents involving hazardous materials.

Relying on outdated SDS may result in inaccurate or incomplete guidance during an accident or emergency, potentially leading to improper first aid measures, delayed treatment, or increased risk to affected personnel. This condition compromises both worker safety and the facility’s ability to respond appropriately to hazardous material events.

Blythe must update all SDS in its database to the most current versions and ensure they are readily accessible to all plant personnel and provide documented confirmation of the update to ESRB for review and verification.

Finding 17: Substation inspections not accurately reflecting field conditions and not being consistently completed.

GO 167-C, Appendix C, 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 C, 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 13: Routine Inspections states in part:

“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.”

During the documentation review, ESRB auditors reviewed the substation monthly inspection checklist dated April 30, 2026. The checklist marked the oil leak inspection item as “SAT” or satisfactory, however, during the field inspection, ESRB auditors observed evidence of an oil leak on GSU Transformer T2. The checklist also indicated that fire extinguisher inspections had been completed, however, ESRB auditors observed a fire extinguisher in the substation with missing monthly inspection checks and an expired annual inspection card.

These discrepancies indicate that the substation monthly inspection checklist did not accurately reflect field conditions. Accurate inspection records are necessary to verify that personnel inspected equipment conditions, identified deficiencies, and entered deficiencies into the work management process for tracking and resolution. Inaccurate inspection documentation may prevent the facility from identifying and correcting equipment or safety deficiencies in a timely manner.

Additionally, ESRB auditors observed that quarterly substation VLA battery inspection records were missing for Quarter 1 in 2024 and Quarter 1 in 2025. Routine VLA battery inspections are necessary to verify battery condition, identify degradation, and ensure that backup power systems remain capable of supporting critical equipment during abnormal or emergency conditions. Missing inspection records prevent verification that required inspections were completed at the required frequency and reduce the facility’s ability to identify developing battery issues before failure occurs.

Blythe must recommunicate inspection and documentation expectations to personnel responsible for conducting substation monthly inspections. The communication must address accurate documentation of field conditions and entry of identified deficiencies into the work order management system for tracking and resolution. Blythe must submit the communication material and recipient roster to ESRB for review and verification. Blythe must also ensure that quarterly substation battery inspections are completed and documented in accordance with site procedures and maintenance schedules.

Finding 18: Canceled work orders did not retain accessible maintenance documentation.

GO 167-C, Appendix C, MS 8: Maintenance Procedures and Documentation states:

“Maintenance procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.”

GO 167-C, Appendix C, MS 17: Equipment History states:

“Maintenance standards or procedures clearly define requirements for equipment history for the systems and equipment, including, what information or data to collect, how to record data, and how the data are to be used.”

GO 167-C, Appendix C, MS 18: Maintenance Facilities and Equipment states:

“Facilities and equipment are adequate to effectively support maintenance activities.”

During documentation review, ESRB auditors found that when a work order is canceled by the Work Excellence team, the associated details and logs become inaccessible, even in cases where the work was completed in the field. This creates a significant tracking and accountability issue, as it prevents the facility from verifying completed tasks, maintaining accurate maintenance history, and ensuring proper documentation of field activities. The loss of records also makes it difficult to assess performance, identify recurring issues or confirm that corrective or preventive actions were carried out as intended. Blythe must correct the system bug that removes work order information upon cancellation and ensure that all completed work remains documented and accessible. Blythe must provide a plan of action and a timeline to address this system issue to ESRB for review and verification.

Finding 19: Work order documentation did not accurately reflect equipment replacement activities and were not appropriately categorized.

GO 167-C, Appendix C, MS 7: Balance of Maintenance Approach states:

“The maintenance program includes the proper balance of the various approaches to maintenance, e.g., preventive, predictive, or corrective. The approach is adequately documented with consideration of economics and reliability of equipment or components, and their effect on reliable operation of the unit.”

Operating experience is factored into the program. Maintenance procedures and documents should include the generation and/or ESS equipment, and all components owned and operated by the ESSO/GAO directly connected to the plant. All integral parts of delivering power to the grid (e.g. fuel supply systems, electrical switchyards, transmissions lines, control systems, penstocks, flumes, heating and cooling systems, exhaust system, communications systems, etc.) are included.”

GO 167-C, Appendix C, MS 8: Maintenance Procedures and Documentation states:

“Maintenance procedures and documents are clear and technically accurate, provide appropriate directions, and are used to support safe and reliable facility operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.”

GO 167-C, Appendix C, 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 16: Participation by Operations Personnel in Work Orders states:

“Operations personnel identify potential system and equipment problems and initiate work orders necessary to correct system or equipment problems that may inhibit or prevent facility operations. Operations personnel monitor the progress of work orders affecting operations to ensure timely completion and closeout of the work orders, so that the components and systems are returned to service. Among other things:

- a) Operations personnel identify problems requiring work orders, and initiate work orders to correct those problems.*
- b) The operations manager or other appropriate operating personnel periodically review work orders that affect operations to ensure timely completion and closeout of the work orders, so that components and systems are returned to service.*
- c) Personnel responsible for prioritizing work orders consult operations personnel to assure that work orders affecting the operations of the plant are properly prioritized.*
- d) Appropriate personnel are trained in and follow procedures applicable to work orders.”*

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 documentation review, ESRB auditors noted a work order regarding a compressor failure at Blythe and a corresponding hot work permit that had been issued for the activity. However, the associated work order did not document that the compressor had been replaced. Accurate work order documentation is necessary to maintain complete equipment history, support maintenance tracking, and ensure that replaced components can be properly monitored for reliability purposes. Incomplete work order records reduce visibility into maintenance activities and limit the effectiveness of the work management system.

Additionally, ESRB auditors noted that preventive work was incorrectly labeled as corrective work in the work order management system, with very limited information entered to describe the task performed. This issue was specifically identified in connection with the DC fire risk assessment work orders. Misclassification of preventive activities as corrective work creates confusion in maintenance records and undermines the accuracy of equipment history and risk assessments.

Blythe must recommunicate work order documentation expectations to personnel responsible for completing and closing work orders and must ensure that all work orders are properly categorized and include sufficient detail to document the scope of work performed. The communication must address documenting maintenance activities performed, equipment replacements, and major corrective actions in the work order management system. Blythe must submit the communication material and recipient roster to ESRB for review and verification. Blythe must also provide a plan of action detailing how it will ensure maintenance activities are properly categorized in the work order management system.

Finding 20: Ground straps on inverter doors were disconnected and damaged.

GO 167-C, Appendix C, MS 1: Safety states:

“The protection of life and limb for the work force is paramount. The company behavior ensures that individuals 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 individuals are consistent with the policies and procedures.”

GO 167-C, Appendix C, MS 4: Problem Resolution and Continuing Improvement states:

“The company values and fosters an environment of continuous improvement, timely and effective problem resolution, and problem prevention. This can be accomplished by applying industry best practices, lessons learned, and proven safety measures for the safety and reliability of both the GA and ESS.”

GO 167-C, Appendix C, 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, OS 8: Plant Status and Configuration states:

“Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation.”

During the field inspection, ESRB auditors observed that ground straps on the doors of numerous inverters throughout the Solar and BESS areas at Blythe were disconnected, pinched, or otherwise damaged. The condition was observed across multiple inverters and multiple areas of the facility, indicating that the issue was not isolated to a single piece of equipment. Ground straps are necessary to maintain proper bonding between enclosure doors and equipment enclosures and help ensure electrical continuity and personnel safety.

Disconnected or damaged ground straps may reduce the effectiveness of equipment grounding and bonding and can increase the risk of electrical hazards, equipment damage, or improper equipment operation. The widespread nature of the condition suggests that existing inspection and maintenance activities are not consistently identifying and correcting grounding and bonding deficiencies.

Blythe must inspect inverter door ground straps throughout all Solar and BESS areas of the facility and repair or replace any straps that are disconnected, damaged, or improperly installed. Blythe must also ensure that routine inspections include verification of grounding and bonding components so that similar deficiencies are identified and corrected in a timely manner. Blythe must submit a plan of action to ESRB detailing how it will address the systemic damaged ground straps issue.



Figure 13: Disconnected grounding straps on the doors of multiple inverters

Finding 21: HVAC cover panels on BATT 18A-9A were not properly secured.

GO 167-C, Appendix C, MS 13: Equipment Performance and Material Condition states:

“Equipment performance and material condition support reliable facility operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems, corrosion, and degradation.”

GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:

“Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation.”

During the field inspection at Blythe Energy Storage III, ESRB auditors observed that the HVAC cover panel on Battery Unit BATT 18A-9A was open and not properly secured. HVAC cover panels are intended to protect the unit enclosure and help prevent debris, dust, moisture, and wildlife from entering the equipment.

An unsecured HVAC cover panel may compromise the condition of the enclosure and affect equipment reliability. A loose or open panel may also create a housekeeping or safety concern if it shifts, detaches further, or interferes with access to the equipment. Properly secured HVAC cover panels are necessary to maintain equipment condition and support safe and reliable operation.

Blythe must properly secure the HVAC cover panel on Battery Unit BATT 18A-9A and submit documentation of the completed corrective action to ESRB for review and verification.



Figure 14: HVAC unit on Battery Unit BATT 18A-9A at Blythe Energy Storage III with unsecured cover panel (left). Close-up view of the unsecured HVAC cover panel (right).

Finding 22: Inverter status light covers were damaged or missing throughout the BESS and Solar Sites.

GO 167-C, Appendix C, MS 1: Safety states:

“The protection of life and limb for the work force is paramount. The company behavior ensures that individuals 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 individuals are consistent with the policies and procedures.”

GO 167-C, Appendix C, MS 4: Problem Resolution and Continuing Improvement states:

“The company values and fosters an environment of continuous improvement, timely and effective problem resolution, and problem prevention. This can be accomplished by applying industry best practices, lessons learned, and proven safety measures for the safety and reliability of both the GA and ESS.”

GO 167-C, Appendix C, 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, OS 8: Plant Status and Configuration states:

“Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation.”

During the field inspection, ESRB auditors observed that multiple inverter status light covers throughout the BESS and Solar areas at Blythe were damaged or missing. ESRB auditors also noted that several status indicator lights were broken or not illuminated, despite the associated inverters being confirmed online and operational. Status indicators are necessary to support equipment monitoring, troubleshooting, and safe maintenance activities by providing personnel with a quick visual indication of equipment condition and operational status. Damaged or non-functional status indicators may reduce operator awareness of equipment conditions and hinder identification of abnormal operating conditions in the field. Additionally, missing light covers allow a path for dust and moisture to penetrate the system.

Blythe must develop an action plan to inspect inverter status indicators and light covers throughout the facility and repair or replace damaged, missing, or non-functional components. Blythe must also ensure that routine inspections identify and correct similar deficiencies in a timely manner. The action plan must be submitted to ESRB for review and verification.

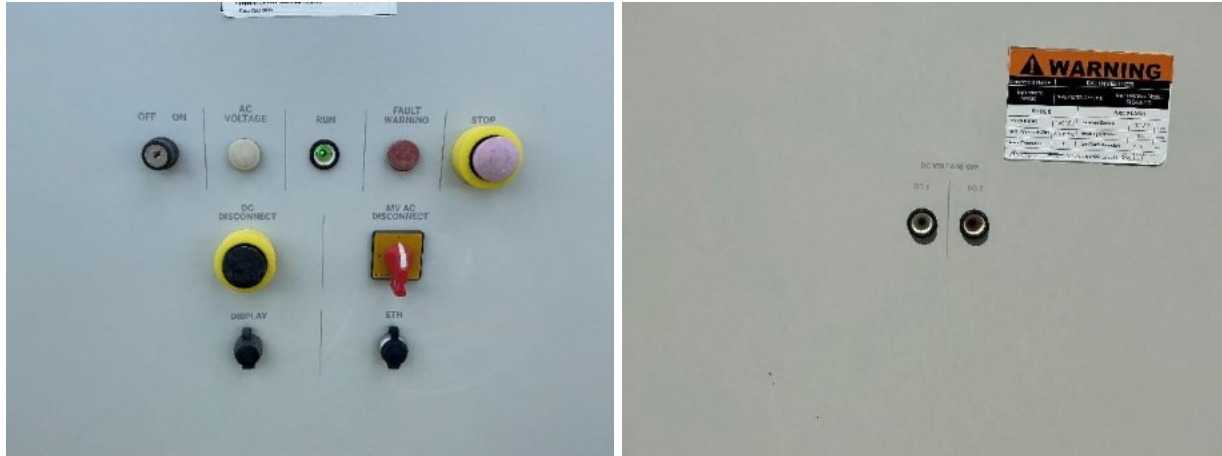


Figure 15: Damaged inverter light covers.



Figure 16: Status lights not operational on working equipment.

II. List of Documents Reviewed

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	Hot Work Procedure
	17	Confined Space Entry Procedure
	18	Emergency Shutdown or Battery Discharge Protocol
	19	Plant Physical Security and Cyber Security Procedures and Records
	20	Job Safety Analysis Program**
Employee Training	21	Safety Training Records*
	22	Skill-related Training Records*
	23	Certifications for Electrical, Welders, Forklift & Crane Operators*
	24	Hazmat Training Records *
Contractors	25	Latest list of Qualified Contractors*
	26	Contractor Selection / Qualification Procedure
	27	Contractor Certification Records
	28	Contractor Monitoring Program
	29	Maintenance Contracts and Operations and Monitoring Contracts

Regulatory	30	Air Permit
	31	Water Permit
	32	Spill Prevention Control Plan (SPCC)
O&M	33	Daily Round Sheets / Checklists
	34	Logbook**
	35	List of Open/Backlogged Work Orders*
	36	List of Closed/Retired Work Orders (last 2 years)*
	37	Open/Backlogged Contractor Issues or Tickets
	38	Work Order Management Procedure (last 3 revisions, if applicable)
	39	Computerized Maintenance Management System (Demonstration onsite)**
	40	SCADA system (Demonstration onsite)**
	41	All Root Cause Analyses (if any) and any analyses of those Root Cause Analyses (RCA) by the site owner or operator if those RCAs were conducted by a third party
	42	Emergency Generator Test and Maintenance Records (last 5 years)
	43	Substation Battery Test and Maintenance Records (last 5 years)
	44	Vegetation Management Procedure, Policy, and records
	45	Solar Maintenance & Inspection Procedures, or Related Documents (last 3 revisions, if applicable)
	46	Maintenance and Inspection Records for Solar Inverters
	47	Maintenance and Inspection Records for Solar Trackers
	48	Maintenance and Inspection Records for Solar Arrays/Collectors/Solar Field
	49	Maintenance and Inspection Records for Mounting System
	50	Maintenance and Inspection Records for Switchgear/breaker/relays
	51	Maintenance and Inspection Records for Electrical System
	52	Maintenance and Inspection Records for other non-BESS equipment
Battery Energy Storage System	53	BESS Maintenance & Inspection Procedures, or Related Documents (last 3 revisions, if applicable)
	54	BESS Maintenance and Inspection Records
	55	Capacity Testing Records and Procedure
	56	Round Trip Efficiency Test Records and Procedure
	57	Thermal Management System Inspection Records
	58	Battery Management System (Rack and Module) Maintenance and Calibration Records
	59	Battery Protection Unit Inspection and Calibration Records
	60	Battery Health Assessment Report and Procedure
	61	Failure Modes and Effects Analysis (FMEA) or Hazard Analysis
	62	Underwriters Laboratory 9540A Test Reports

BESS Fire Suppression System	63	BESS Fire Suppression System Inspection, Maintenance, and Testing Records
	64	BESS Fire Suppression System As Built Drawings and Schematics
	65	Operations and Monitoring Setup of the BESS Fire Suppression System (Onsite Demonstration)**
	66	BESS Fire Suppression System Integration with Fire Alarm Panel Design Records or Manuals
	67	BESS Fire Suppression System Standard Operating Procedure or Control Room User Manual
Transformers	68	Medium Voltage Transformer Maintenance and Inspection Records
	69	Maintenance and Inspection Records for Main Transformer(s)
	70	Hot Spots / IR Inspection Reports
	71	Dissolved Gas Analysis Reports
Instrumentation	72	Instrument Calibration Procedures and Records
	73	Fire, Heat, Gas, and Smoke Detection Calibration and Test Records
Test Equipment	74	Calibration Procedures and Records
Documentation	75	Record of Thermal Runaway Events
	76	Module or Rack level Electrical Schematics
	77	As-Built Construction Drawings including Single Line Diagram
	78	OEM BESS Data/Specification Sheet
	79	Vendor Manuals (BESS, BMS, Inverter)
Spare Parts	80	Spare Parts Inventory List
	81	Shelf-life Assessment Report
Management	82	Employee Performance Review Procedures and Verifications
	83	Organizational Chart
Internal Audit	84	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.

*** Reportable Incidents that meet GO 167-C Section 9.4 that occurred within the 5 years.