

BLYTHE SOLAR 110, LLC
BLYTHE SOLAR II, LLC
BLYTHE SOLAR III, LLC
BLYTHE SOLAR IV, LLC

July 24, 2026

VIA E-MAIL (ATTACHMENTS SUBMITTED VIA KITeworks)

Emmanuel Salas
Utilities Engineer
Electric Safety and Reliability Branch
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298
Email: Emmanuel.Salas@cpuc.ca.gov

RE: General Order (GO) 167-C Audit of Blythe Solar (III & IV) and Blythe Energy Storage (110, II, III, IV), Audit Number GA2026-06BS

Dear Mr. Hur:

Blythe Solar 110, LLC, Blythe Solar II, LLC, Blythe Solar III, LLC, and Blythe Solar IV, LLC (Blythe Cluster) hereby submits Corrective Action Plan requested in your audit letter of June 30, 2026. Blythe Cluster is providing these documents electronically via Kiteworks.

Blythe Cluster also provides certain narrative responses to the Corrective Action Plan in order to provide additional information or context. Please see Attachment A to this cover letter.

Blythe Cluster's documents provided in response to this request are designated as Confidential Material. In support of this designation, Blythe Cluster is separately requesting confidential treatment under GO 167-C via a letter to CPUC Legal staff.

Sincerely,
BLYTHE SOLAR 110, LLC
BLYTHE SOLAR II, LLC
BLYTHE SOLAR III, LLC
BLYTHE SOLAR IV, LLC

CC: Lee Palmer, Director of Safety and Enforcement Division (SED), CPUC(leslie.palmer@cpuc.ca.gov)
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Daniel La Bella, Public Utilities Regulatory Analyst, ESRB, SED, CPUC

Attachment A
Blythe Solar 110, LLC, Blythe Solar II, LLC, Blythe Solar III, LLC, and Blythe Solar IV, LLC
Corrective Action Plan – Additional Information

CPUC Audit Findings Number	CPUC-Findings Requiring Corrective Action	Blythe Solar 110, LLC, Blythe Solar II, LLC, Blythe Solar III, LLC, and Blythe Solar IV, LLC Additional Information or Response
1	Inspection, testing, and maintenance (ITM) records were not provided for the installed Blythe Energy Storage II manual dry-type fire protection system.	Testing was completed on 7/9 and 7/10 via PO 2700041917. Results are loaded to Kiteworks. Preventative Maintenance Work Orders have been established for quarterly, annual, and 5-year fire system inspections.
2	The Emergency Action Plan (EAP) does not accurately identify site-specific Battery Energy Storage System (BESS) fire protection systems.	These corrections were made during the onsite visit. An updated EAP was provided at that time.
3	Missing and Inaccurate Failure Modes and Effects Analyses (FMEA) for Blythe Energy Storage Facilities	Blythe FMEA was provided during the onsite visit and has been uploaded to Kiteworks.
4	Dracker substation control house Exhaust Fan switches were found in the off position	Corrections were made during the onsite visit. A revised inspection process has been loaded to Kiteworks.
5	Dust emissions contact sign was not fully legible.	Corrections were made during the onsite visit. A step has been added to the monthly fence line inspection to inspect signs at the gate and on the fence line for wear and to create a work order for sign replacement if required.
6	Insufficient completion and recordkeeping of emergency drill critiques and performance documentation.	A sample drill (Q2 Emergency Response Drill – Cyber Attack) has been loaded to Kiteworks. Additionally, a PM for quarterly drill reminders has been implemented.
7	The EAP Section 8.7 does not address documentation of real emergencies as drills or require nighttime drills.	Blythe has updated EAP Section 8.7 to clearly define quarterly drill criteria, qualifying drills and scenarios, and the required actions and documentation standards for a drill to be considered complete and recorded. Night-time drill requirements have been incorporated to ensure safe and effective response during night-time work conditions. These corrections were made during the onsite visit. An updated EAP was provided at that time. The updated EAP has been loaded to Kiteworks.
8	Overgrown vegetation is creating potential fire and	Procedures added to Section 3.0 of DC/PV Field Global IOW – Block Inspection to outline when and

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	access hazards near combiner boxes.	what action to be taken when weed growth is identified.
9	Generator Step Up (GSU) transformer T2 has evidence of an oil leak	During the audit, Blythe personnel entered a work order for the GSU Transformer T2 oil leak into its work order management system. The oil present on the side of the GSU will be inspected and cleaned during the next planned plant outage, currently scheduled for December 2026 due to summer outage restrictions.
10	One cooling fan on GSU Transformer T4 did not operate when tested.	Correction was made on site. Proof of work order close out has been loaded to Kiteworks.
11	GSU Transformer T1 had a disconnected and dangling grounding wire	A Neutral Ground Reactor (NGR) limits line-to-ground fault current by adding impedance. NGRs weren't needed on T1 and T2 originally, but adding T3, T4, and BESS increased available fault current — requiring NGRs on all four transformers. Attached drawings show both the original and current configurations. Obsolete Ground Cable will be removed during the next outage expected before December 2026 due to summer outage restrictions.
12	EAP muster point maps and terminology are inconsistent	These corrections were made during the onsite visit. An updated EAP was provided at that time and has been reloaded to Kiteworks.
13	Orientation materials contain incomplete and illegible information.	The correction was made during the on-site visit and a CM has been created to review the materials and make updates each January. Proof of work order creation has been loaded to Kiteworks
14	Fire extinguisher inspection tags were missing, outdated, or incomplete at multiple locations	Revised the PM to add a list of all fire extinguishers by site. Also included are photos showing the corrected fire extinguishers. Photo's have been loaded to Kiteworks.
15	Exit sign in the substation control room was not functioning properly.	The PGD T&S Substation Condition Assessment document shows under Control House 1.12 the assessment for the Exit Sign. The Exit signs are tested on a routine basis as part of the T&S Condition Assessment. The document has been uploaded to Kiteworks.
16	Safety Data Sheets (SDS) sheets are outdated versions	The correction was made during the on-site visit. Additionally, a training took place on 5/8/2026 to refresh the team on the 3M system.

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17	Substation inspections not accurately reflecting field conditions and not being	Blythe has recomunicated inspection and documentation expectations to all personnel responsible for conducting substation monthly inspections. The communication addressed accurate documentation of field conditions and the requirement to enter identified deficiencies into the work order management system for tracking and resolution. Communication materials and the recipient roster have been submitted to ESRB for review and verification. Additionally, Blythe has confirmed that quarterly substation battery inspections are being completed and documented in accordance with site procedures and maintenance schedules. Ongoing compliance will be maintained through supervisory oversight and work order management system audits.
18	Canceled work orders did not retain accessible maintenance documentation	Site Management has reviewed the work order discrepancies and has made internal process improvements to ensure work orders are no longer inadvertently closed without capturing the appropriate details surrounding the work completed.
19	Work order documentation did not accurately reflect equipment replacement activities and were not appropriately categorized	Blythe has completed the recomunication of work order documentation expectations to all personnel responsible for completing and closing work orders. A formal training session was conducted covering the standard policy for properly categorizing work orders and including sufficient detail to document the scope of work performed All technicians have completed the training. Communication materials and the signed recipient roster have been submitted. A plan of action has been established and implemented to ensure ongoing compliance; Central Origination team now publishes a Daily Work Order Review email allowing leaders to review logs from previous day's work.
20	Ground straps on inverter doors were disconnected and damaged.	PO 2700030496 has been established for the procurement of inverter door ground straps. The OEM was unable to fulfill the complete order and has issued a partial shipment — 25 of 75 ground straps received on 7/1/2026. Remaining units are pending a subsequent OEM shipment. The site team has begun corrective work and is targeting 8/15/2026 as the completion date for all inspections and repairs. Parts received are being inventoried to prevent delays associated with future ground strap failures.

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		Scope of Work: Blythe is inspecting inverter door ground straps across all Solar and BESS areas of the facility. Any straps found to be disconnected, damaged, or improperly installed are being repaired or replaced. Routine inspection protocols have been updated to include verification of grounding and bonding components, ensuring similar deficiencies are identified and corrected in a timely manner. Ground strap inspections will be incorporated into the annual Summer Readiness Preventive Maintenance cycle going forward. See Attached Document Step #25
21	HVAC cover panels on BATT 18A-9A were not properly secured.	This was corrected during the on-site visit. A photo has been uploaded to Kiteworks.
22	Inverter status light covers were damaged or missing	Blythe has developed and is actively executing an action plan to inspect inverter status indicators and light covers throughout all Solar and BESS areas of the facility. Damaged, missing, or non-functional components are being identified and flagged for repair or replacement. PO 2700030776 has been established for lens replacement parts. An email was sent to the OEM on 7/1 requesting a status update. On 7/7, the OEM confirmed a partial shipment of lenses would be dispatched; however, the second half of the lens order will not be available from the OEM until 10/26/2026. The site is actively seeking outside/alternate sourcing to complete replacements prior to that date. All received parts are being inventoried to prevent lag in addressing broken or worn lens components as they are identified. Routine inspection procedures have been updated to include verification of inverter status indicators and light covers to ensure similar deficiencies are identified and corrected in a timely manner. This action plan has been submitted to ESRB for review and verification.