

## PUBLIC UTILITIES COMMISSION

320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013

**Redacted Document**

June 1, 2026

Damodaran Sri Ramulu  
Senior Director, Field Operations  
Baldy Mesa & Silver Peak  
AES Clean Energy

**SUBJECT: General Order (GO) 167-C Audit of Baldy Mesa and Silver Peak Solar & BESS,  
Audit Number GA2026-04BM**

Dear Damodaran Sri Ramulu:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Evan Coughran, Emmanuel Salas, Emanuel Herrera Pineda, and Jose Chavez of ESRB staff conducted a generation and energy storage audit of Baldy Mesa and Silver Peak Solar & BESS from April 6 through April 9, 2026.

During the audit, ESRB staff 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 June 30, 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](mailto:evan.coughran@cpuc.ca.gov). Please note that although Baldy Mesa and Silver Peak Solar & BESS 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 Baldy Mesa and Silver Peak Solar & BESS 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](mailto:GO167@cpuc.ca.gov) by June 30, 2026.

Please note that ESRB will also post the Baldy Mesa and Silver Peak Solar & BESS 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](mailto: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

Attachment: CPUC Generation Audit Findings

Cc: Lee Palmer, Deputy Executive Director of Safety and Enforcement Division, Safety  
Policy and Water, CPUC  
Eric Wu, Program Manager, ESRB, SED, CPUC  
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC  
Emmanuel Salas, Utilities Engineer, ESRB, SED, CPUC  
Emanuel Herrera Pineda, Utilities Engineer, ESRB, SED, CPUC  
Jose Chavez, Utilities Engineer, ESRB, SED, CPUC

**CPUC AUDIT FINDINGS OF  
Baldy Mesa and Silver Peak Solar & BESS  
April 6 – April 9, 2026**

**I. Findings Requiring Corrective Actions.**

**Finding 1: Deflagration panel was not fully secured in the closed position.**

**General Order (GO) 167-C, Appendix C, Maintenance Standard (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.”*

**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, Operation Standard (OS) 8: Plant Status and Configuration** states:

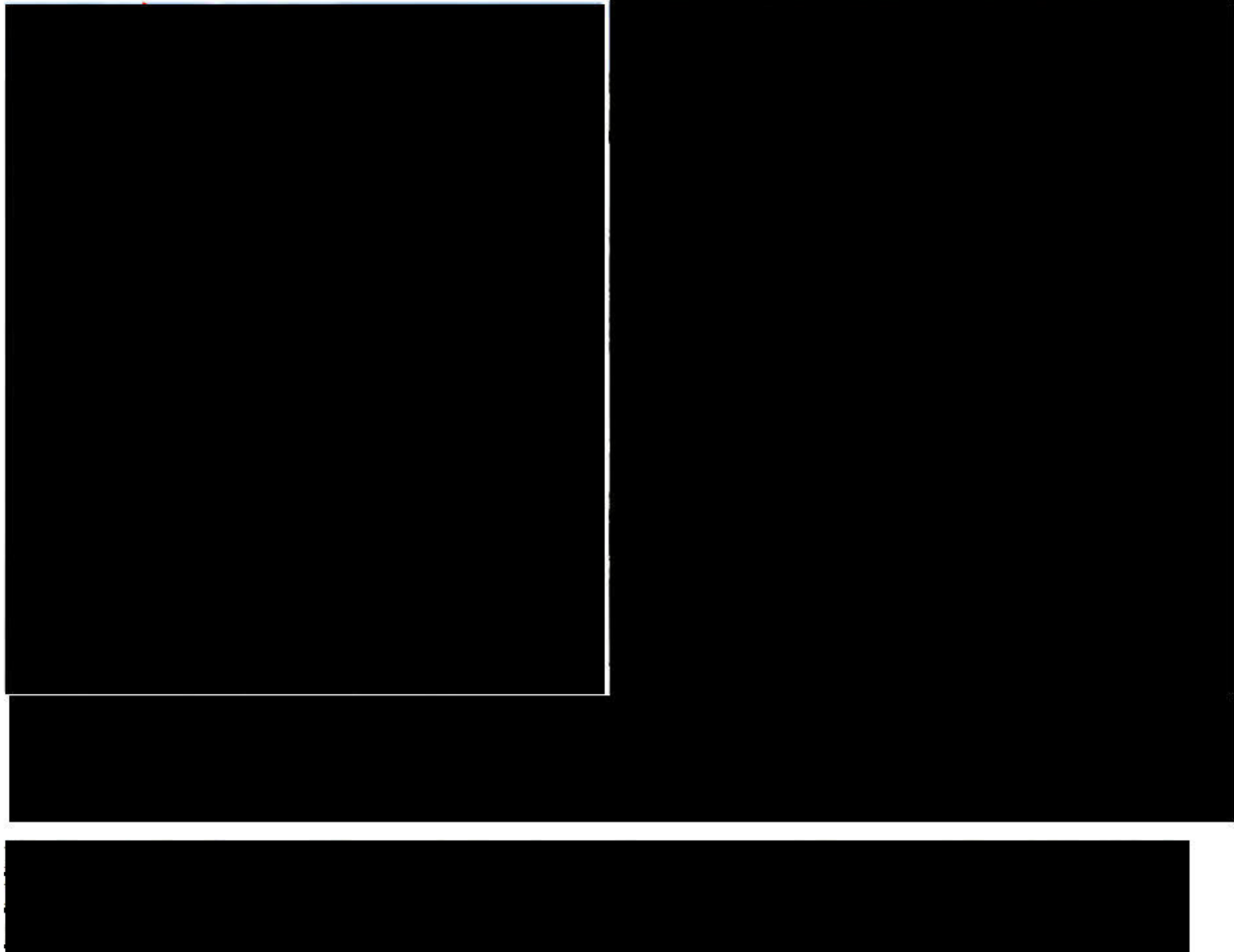
*“Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation.”*

During the onsite inspection at the Baldy Mesa and Silver Peak facilities, Electric Safety and Reliability Branch (ESRB) inspectors observed a deflagration panel that was partially open and not properly secured in its intended closed position. Deflagration panels are safety critical components designed to protect personnel and equipment by relieving pressure during an internal pressure event. When these panels are not fully secured, they may fail to activate as designed, creating a significant safety hazard and compromising the facility’s ability to operate safely and reliably.

During the inspection, a Baldy Mesa and Silver Peak technician stated that tests had recently been conducted on the deflagration panel, and as a result, the panel had been left slightly open by accident. The technician accessed the Battery Energy Storage System (BESS) controller system and was able to fully close the deflagration panel to its complete closed position during the inspection. Staff also reported that an alarm should have been triggered through their Supervisory Control and Data Acquisition (SCADA) system when the panel was partially open. However, there was no indication that any alarms were generated.

In addition, an open or partially open deflagration panel exposes the BESS unit to water intrusion, dust, and moisture. These contaminants can enter the enclosure and degrade electrical components, wiring insulation, and battery modules. Such exposure increases the risk of corrosion, electrical faults, and potential short circuits, which may lead to battery damage, internal cell shorts, or thermal events. Under certain failure conditions, this could initiate a thermal runaway event, further elevating the risk of fire and severe equipment damage.

Baldy Mesa and Silver Peak must ensure that all protective devices and safety related equipment are properly maintained, secured, and routinely verified through documented inspection and maintenance practices. In addition, all BESS units must be inspected to confirm full closure and proper securing of their deflagration panels, and Baldy Mesa and Silver Peak management must direct operators to perform a comprehensive inspection to ensure all panels are fully closed and in their correct configuration. Baldy Mesa and Silver Peak must implement procedures and checks to their current maintenance procedure to ensure that no deflagration panels remain open after work is conducted in the future. Baldy Mesa and Silver Peak must provide updated procedures and checks to ensure compliance.



**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 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 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."*

**NFPA 72, Section 14.3.1** states:

*"Unless otherwise permitted by 14.3.2, visual inspections shall be performed in accordance with the schedules in Table 14.3.1 or more often if required by the authority having jurisdiction."*

**NFPA 72, Section 14.2.2.3.1** states:

*"System deficiencies shall be corrected."*

During the documentation review, ESRB inspectors reviewed the NFPA 72 Visual and Functional Inspection of Fire Alarm Systems records provided for Baldy Mesa and Silver Peak. The Baldy Mesa annual report [REDACTED], identified multiple failures, including that a document cabinet was not present at the system control unit or other approved location and that copies of as-built drawings were not available at the BESS yard. During the audit, Baldy Mesa and Silver Peak provided a retest report showing that most of the deficiencies identified in the annual inspection had been addressed, however, the retest report did not include any documentation showing that these two deficiencies were corrected or otherwise resolved.

The same annual report also included a "Semi-Annual Inspection, Test and Maintenance for Batteries (Individual or Pair)" [REDACTED]. When ESRB inspectors requested records for the other semi-annual inspection period [REDACTED], Baldy Mesa and Silver Peak were not able to provide additional records demonstrating that the other [REDACTED] inspection were completed.

Based on the [REDACTED] configuration described in the records provided for the audit, each cube contains a multi-criteria detector with carbon monoxide and smoke sensing functions, a horn/strobe, and an Input/Output device. The records also indicate that each core includes a fire panel and a horn/strobe. Under NFPA 72 Table 14.3.1, applicable devices and functions requiring semi-annual visual inspection include smoke detectors, carbon monoxide detectors/systems, alarm control interfaces and emergency control function interfaces, audible appliances, visual appliances, and applicable battery inspection items specified in Table 14.3.1. Baldy Mesa and Silver Peak did not provide records demonstrating that it completed the required semi-annual visual inspections for applicable equipment in the cores and cubes at the required frequency apart from the September 12, 2025, NFPA 72 Visual and Functional Inspection of Fire Alarm Systems report.

Periodic visual inspections are intended to identify any deficiency that may affect fire alarm system operability. When Baldy Mesa and Silver Peak does not complete or document required semi-annual visual inspections, and when identified deficiencies are not supported by documented corrective actions, Baldy Mesa and Silver Peak cannot demonstrate that it is effectively identifying, tracking, and resolving fire protection issues. The absence of documented follow-up for the missing document cabinet and unavailable as-built drawings also limits Baldy Mesa and Silver Peak's ability to demonstrate that those deficiencies were entered into the corrective action process and resolved in a timely manner.

Baldy Mesa and Silver Peak must ensure that all fire protection devices requiring semi-annual visual inspection under NFPA 72 are inspected and documented at the required frequency. Baldy Mesa and Silver Peak must also follow up with [REDACTED] to resolve the identified deficiencies related to the missing document cabinet at the system control unit and the absence of as-built drawings at the BESS yard and maintain documentation showing how those deficiencies were corrected. Baldy Mesa and Silver Peak must submit documentation showing how these identified deficiencies were reviewed and resolved, along with documentation describing how it will ensure future compliance with the required NFPA 72 semi-annual inspection frequency, to ESRB for review and verification.

**Finding 3: Pre-audit documentation submitted was incomplete and contained inconsistencies with site conditions.**

**GO 167-C, Appendix D, OS 2: Organizational Structure and Responsibilities** states:

*"The organization with responsibility and accountability for establishing and implementing an operation 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, are clearly defined, and commensurate with responsibilities."*

**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."*

Documentation was not submitted completely by the required due date. Several requested safety records, maintenance records, and inspection documents were missing at the time of submittal. Additionally, work order documentation contained inaccurate dates and inconsistencies when compared to the work order management system observed while on site. Accurate and complete documentation is essential to verify that required inspections and maintenance activities are being performed as scheduled and that equipment condition is properly tracked. Incomplete or inconsistent records reduce confidence in the accuracy of the maintenance history and limit the ability to confirm that required work has been performed.

Baldy Mesa and Silver Peak, AES [REDACTED], must ensure that documentation is submitted completely and by the required due dates for all future CPUC regulatory enforcement activities on AES [REDACTED] facilities.

**Finding 4: Work orders lack sufficient detail and are not consistently entered prior to work completion.**

**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 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 inspectors observed that work orders at Baldy Mesa and Silver Peak do not consistently contain sufficient detail describing the work performed. Several work orders lacked adequate descriptions of completed activities, including work performed by contractors and warranty-related work. Warranty replaced equipment was found to not be consistently tracked in the work orders associated with the issues that caused the work order to be opened. Additionally, some work orders were entered into the system after the work had already been completed, limiting the ability to effectively plan, track, and verify maintenance activities. Work orders were found with descriptions stating the work was completed with a date being a month before the work order was created in the system.

Work orders serve as an important tool for documenting maintenance history, tracking work status, identifying recurring issues, supporting warranty claims, and ensuring continuity of knowledge across site personnel. Incomplete or delayed work order entry reduces effectiveness of work order management system, limits transparency of work performed, and hinders the ability to verify that maintenance activities were completed in accordance with site requirements. Baldy Mesa and Silver Peak must ensure that work orders are created promptly upon initiation of work and contain sufficient detail to clearly describe the scope of work completed, including contractor activities and warranty-related actions.

**Finding 5: Baldy Mesa and Silver Peak does not document engineering justification when not following oil analysis recommendations.**

**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 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 documentation review, ESRB inspectors reviewed Dissolved Gas Analysis (DGA) reports for transformers at the site. The Delta-X Research TOA Analysis Report for Solar Pad Mount 460636 identified abnormal ethylene (C<sub>2</sub>H<sub>4</sub>) and carbon dioxide (CO<sub>2</sub>) levels and listed a Duval Triangle diagnosis of T3 - High-range thermal fault (above 700°C). The report’s DGA remarks section also stated: *“(Initial sample). Abnormal or high gas levels. Thermal fault (above 700°C). An additional sample is required to check for active gassing.”*

When ESRB inspectors asked whether Baldy Mesa and Silver Peak had followed up on this recommendation, Baldy Mesa and Silver Peak were unable to provide records showing that it took further action, such as obtaining an additional sample or documenting an engineering evaluation supporting a decision not to resample. Baldy Mesa and Silver Peak stated that the remarks in the Delta-X report were auto-populated by the software. However, ESRB inspectors reviewed other Delta-X reports and found that the remarks section was not uniformly auto-populated, as some reports stated “No anomalies” rather than recommending further action.

Baldy Mesa and Silver Peak also explained that AVO Diagnostic Services performs the oil analysis and issues the primary report, and that the Delta-X report is a secondary in-house report used to evaluate the AVO Diagnostic Services results. However, ESRB inspectors reviewed the AVO Diagnostic Services report and noted that it also identified abnormal C<sub>2</sub>H<sub>4</sub> and CO<sub>2</sub> levels for medium voltage pad mount transformer 460636, which further indicates that the Delta-X report’s recommendation was not simply an auto-populated software comment, but a potentially valid recommendation to obtain an additional sample to assess active gassing.

Oil analysis reports are intended to identify abnormal transformer conditions and support timely maintenance decisions. When a report identifies abnormal gas levels or recommends follow-up action, Baldy Mesa and Silver Peak must document the technical basis for its evaluation of the result, including any decision not to take further action. Without that documentation, Baldy Mesa and Silver Peak cannot demonstrate that it appropriately evaluated the condition or used the oil analysis results effectively to support equipment reliability.

Baldy Mesa and Silver Peak must establish and implement a procedure for reviewing oil analysis reports that defines how personnel evaluate abnormal results and document the technical basis for any decision not to take further action. Baldy Mesa and Silver Peak must submit that procedure, along with documentation showing how it evaluated and resolved the findings for medium voltage pad mount transformer [REDACTED] to ESRB for review and verification.

**Finding 6: SCADA system has functional issues and operational inconsistencies.**

**GO 167-C, Appendix D, OS 9: Engineering and Technical Support** states:

*“Engineering activities are conducted such that equipment performance supports reliable facility operation. Engineering provides the technical information necessary for the facility to be operated and maintained within the operating parameters defined by facility design. Software is up-to-date for cyber security and routinely backed up for safety, reliability, and operational purposes. Engineering and technical staff provide support, when needed, to operations and maintenance groups to resolve operations and maintenance problems.”*

**GO 167-C, Appendix D, OS 12: Operations Conduct** states:

*“To ensure safety and optimize facility availability, the facility conducts operations systematically, professionally, and in accordance with approved policies and procedures. The facility takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow facility and operation procedures and instructions while taking responsibility for safety. Among other things:*

- a) All personnel follow approved policies and procedures. Procedures are current and include a course of action to be employed when an adopted procedure is found to be deficient.*
- b) All operations are performed in a professional manner. Professional conduct applies throughout the facility site at all times.*
- c) All personnel on duty are trained, qualified, and capable of performing their job functions. Personnel are assigned only to duties for which they are properly trained and qualified.*
- d) Personnel take immediate actions to prevent or correct unsafe situations. Anyone shall have the right to stop work if they see an unsafe condition.”*

**GO 167-C, Appendix D, OS 15: Communications and Work Order Meetings** states:

*“The availability of the GA and/or ESS and safety of personnel is ensured during the execution of work orders by adequate communications and meetings, which may be scheduled or as needed, to review work plans with all affected personnel before work begins. Clear lines of communication exist between personnel responsible for operations, maintenance, and engineering groups. Among other things:*

- a) The GAO or ESSO prepares and maintains a procedure for review of work plans through communications and work order meetings at the facility.*
- b) Work is analyzed to determine what personnel, components, and systems are affected.*
- c) Affected personnel meet before work begins to define the work, identify safety issues, to minimize the impact on facility operation, and to determine the need for further meetings.*
- d) Personnel are trained in and follow the procedure.”*

During the audit, ESRB inspectors observed discrepancies within the SCADA alarm management system at Baldy Mesa and Silver Peak. Inspectors noted that certain alarms did not appear in the main alarm interface, sections of the fire alarm interface were greyed out, and field verified equipment faults were not accurately reflected within the SCADA system. Accurate alarm visibility is essential to ensure operators are promptly informed of abnormal conditions and can respond appropriately. Discrepancies between field conditions and SCADA alarm indications may result in delayed response to equipment faults and reduce operator awareness of system status. Alarm interfaces must provide clear and reliable information to support safe and effective operation of the facility.

Baldy Mesa and Silver Peak must review and correct discrepancies within the SCADA alarm management system to ensure alarms are properly displayed, fire alarm system interfaces are fully functional, and equipment faults identified in the field are accurately reflected within the system. Baldy Mesa and Silver Peak must verify proper alarm functionality and ensure alarm configurations remain consistent with actual equipment conditions.

**Finding 7: Emergency drills not conducted at six-month intervals and improperly documented.**

**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.”*

**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 inspection, ESRB inspectors found that emergency drill records were not adequately documented, were not centrally retained, and that drills were not being conducted at the required six-month frequency as specified in the Baldy Mesa and Silver Peak Emergency Response & Communication Plan (ERCP). The Baldy Mesa and Silver Peak ERCP states that *"Drills or other tests of the ERCP must take place at least semi-annually and be documented. Drills must be specific, and the results of the exercises must be documented"*. Although Baldy Mesa & Silver Peak Solar & BESS personnel indicated that emergency drills had been conducted, the available documentation consisted primarily of sign-in sheets and did not adequately document the drill scenario performed, results of the exercise, lessons learned, issues identified, or corrective actions. Additionally, records were incomplete limiting the ability to demonstrate that drills were consistently conducted at the required frequency. Incomplete or missing drill documentation makes it difficult to verify training effectiveness, evaluate emergency preparedness, and identify areas for improvement. Emergency drills are essential to ensure that employees understand alarm recognition, evacuation routes, and muster point locations during an emergency. Emergency drills also allow Baldy Mesa and Silver Peak management to identify and remedy issues with their emergency systems and procedures in a controlled environment.

Baldy Mesa and Silver Peak must conduct drills in accordance with the requirements of the implemented ERCP and ensure that each drill is formally documented. Documentation must include the date of the drill, participating personnel, and any identified lessons learned or corrective actions.

**Finding 8: Baldy Mesa and Silver Peak have not maintained generator usage logs for the Hamlin Substation generator as required.**

**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."*

**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."*

**Mojave Desert Air Quality Management District Permit** states in part:

*“6. The owner/operator shall maintain an operations log for this unit current and on-site (or at a central location) for a minimum of three (3) years, and this log shall be provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below:*

- a. Date of each use and duration of each use (in hours);*
- b. Reason for use (testing & maintenance, emergency, required emission testing);*
- c. Calendar year operation in terms of fuel consumption (in standard cubic feet or gallons) or total hours; and,*
- d. Records of all inspections, maintenance and repair actions.”*

During the documentation review, ESRB inspectors learned that Baldy Mesa and Silver Peak was replacing the older Hamlin Substation emergency generator with a new generator and was using a temporary generator while the new unit was being commissioned. ESRB inspectors requested the permit and operating records for the older generator after Baldy Mesa and Silver Peak provided the permit for the new generator. Although ESRB inspectors requested the permit required usage logs for the older generator, Baldy Mesa and Silver Peak did not provide any records documenting its operation.

Baldy Mesa and Silver Peak’s inability to produce usage logs for the old generator indicates that it did not maintain the records required by the generator permit. Without these logs, Baldy Mesa and Silver Peak cannot demonstrate when the generator operated, how long it operated, and why it operated. Maintaining complete and current generator operating records is necessary to demonstrate environmental compliance and proper operational oversight.

Baldy Mesa and Silver Peak must ensure that it maintains complete and current usage logs for the substation emergency generator in accordance with the Mojave Desert Air Quality Management District permit. Baldy Mesa and Silver Peak must implement a procedure to ensure that personnel document each generator operation and all permit-required details at the time of use, and Baldy Mesa and Silver Peak must submit that procedure to ESRB for review and verification.

**Finding 9: Required snake-chaps not identified in the site orientation or in the ERCP.**

**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”*

**GO 167-C, Appendix D, OS 12: Operations Conduct** states:

*“To ensure safety and optimize facility availability, the facility conducts operations systematically, professionally, and in accordance with approved policies and procedures. The facility takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow facility and operation procedures and instructions while taking responsibility for safety. Among other things:*

- a) All personnel follow approved policies and procedures. Procedures are current and include a course of action to be employed when an adopted procedure is found to be deficient.*
- b) All operations are performed in a professional manner. Professional conduct applies throughout the facility site at all times.*
- c) All personnel on duty are trained, qualified, and capable of performing their job functions. Personnel are assigned only to duties for which they are properly trained and qualified.*
- d) Personnel take immediate actions to prevent or correct unsafe situations. Anyone shall have the right to stop work if they see an unsafe condition.”*

During the inspection, ESRB inspectors found that snake-chaps are required for personnel at the facility during summer months due to venomous snakes found in the area. This requirement was not identified in the site orientation materials or in the ERCP. The lack of documented required safety equipment from these documents results in unclear expectations for personnel and may lead to inconsistent use of safety equipment in environments where wildlife hazards are present. When required safety equipment is not documented, personnel may not be fully aware of necessary protective measures that must be taken to ensure their safety while on site. The absence of required safety equipment from the orientation materials and ERCP indicates that these documents do not accurately represent current operating practices. Baldy Mesa and Silver Peak must ensure that all required safety equipment, including snake-chaps, is fully and accurately documented in the site orientation materials, ERCP, and any other relevant safety or operational procedures. Baldy Mesa and Silver Peak must update these documents to reflect actual safety requirements and submit any updated documentation to ESRB.

**Finding 10: Quarterly emergency communication system testing not conducted.**

**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 inspection, ESRB inspectors found quarterly testing of communication system was not being conducted and documented. Baldy Mesa and Silver Peak ERCP states that *"Communication systems (cell phones, radios, sat phones, computer messaging systems) must be tested at least every three months and documented. Satellite phones tests are documented by ISOC. All others are documented locally, and available from the EHS department"*. While on site it was confirmed that site personnel's cell phones were used for emergency communication and was the primary communication system utilized by Baldy Mesa and Silver Peak. The absence of testing records indicates that Baldy Mesa and Silver Peak's procedures for maintaining its communication systems are not being followed or documented as required.

Baldy Mesa and Silver Peak must ensure that all emergency communication systems, including text message notification platforms, are tested according to their procedures interval and that each test is fully documented. Baldy Mesa and Silver Peak must submit a documented test of their communications system and any updated or created procedure in relation to testing the Communications system.

**Finding 11: Lockout/Tagout (LOTO) was found without the required contact phone number recorded on the tag**

**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”*

**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 inspection, ESRB inspectors observed LOTO tags at the facility missing the required phone number on the back of the tag, as specified by site procedures. Baldy Mesa and Silver

Peak LOTO program [REDACTED] states clearly about lockout devices and accompanied tags *“The Lockout Device must uniquely identify the owner of the Lockout Device by means such as, but not limited to, be individually identifiable, and include the owner’s full name (initials alone are not acceptable) and individual telephone number (general company phone number is not acceptable). The lock will be accompanied by a tag with full name and individual telephone number if unable to document all information on the lock”*. Incomplete LOTO tags hinder effective communication during equipment isolation and can delay coordination in the event of an incident. Ensuring that LOTO tags are fully and accurately completed is a fundamental element of maintaining safety culture.

Baldy Mesa and Silver peak must ensure that all LOTO tags are fully completed, including the required phone number and all other identifying information, prior to use. Baldy Mesa and Silver peak must also ensure that personnel are aware of the implemented procedures in place and ensure that all procedures are followed. Periodic checks must be conducted to ensure that all hung tags are properly completed.

**Finding 12: Equipment labels and stickers are degraded and weather worn.**

**GO 167-C, Appendix C, MS 1: Safety** states in part:

*“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.”*

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

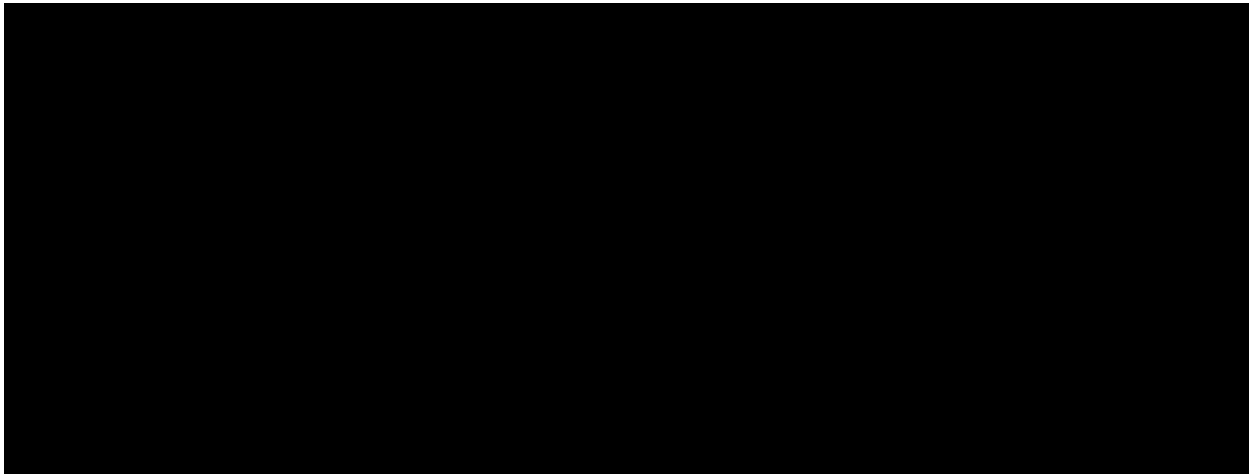
*“The company values and fosters an environment of continuous improvement, timely and effective problem resolution, and problem prevention. This can be accomplished by applying industry best practices, lessons learned, and proven safety measures for the safety and reliability of both the GA and ESS.”*

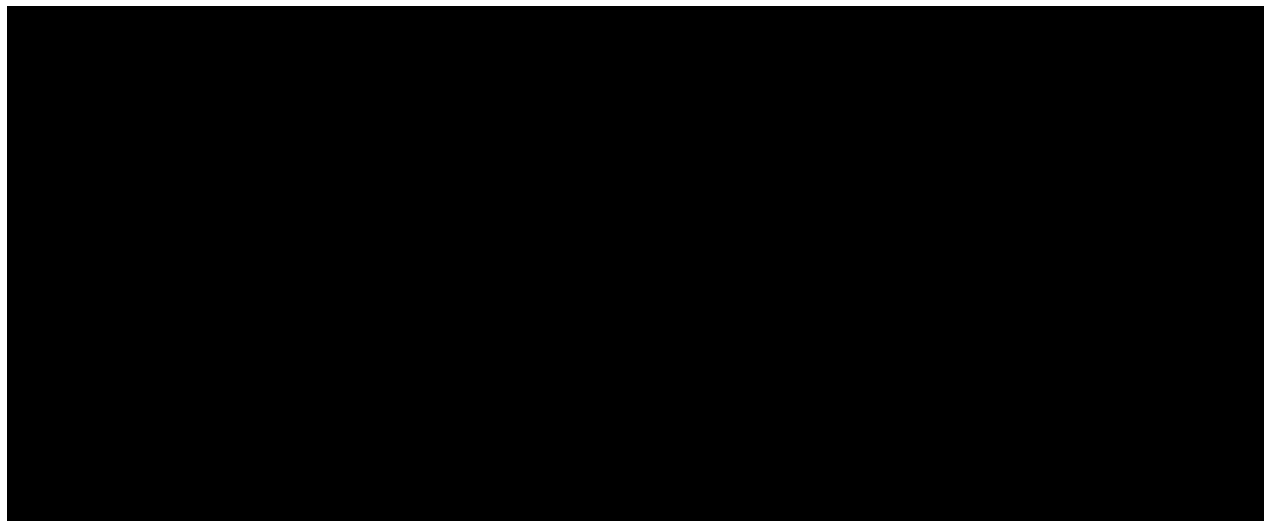
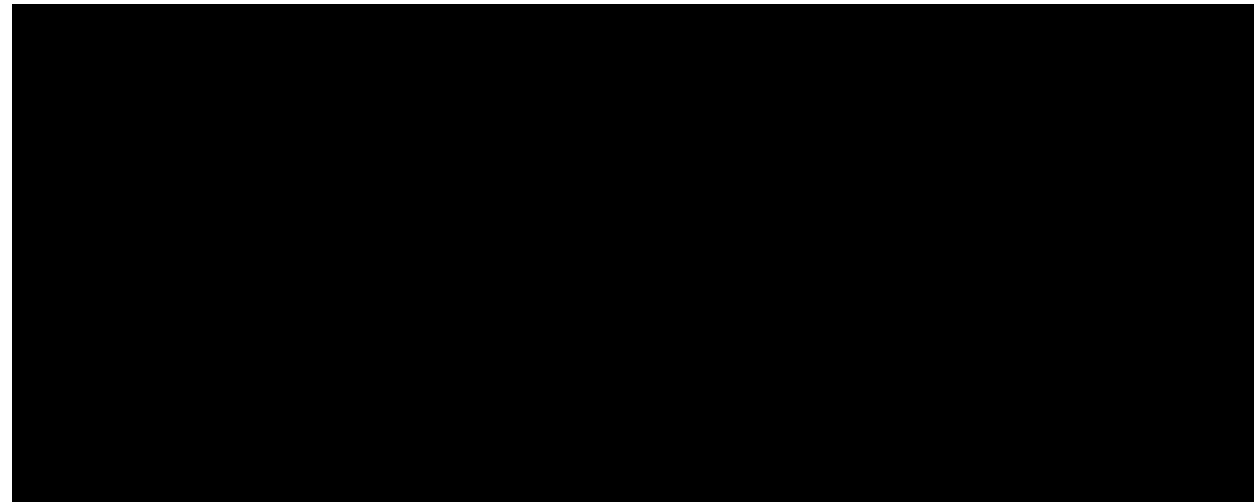
**GO 167-C, Appendix C, MS 11: Plant Status and Configuration** states:

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

During the field inspection, ESRB inspectors observed that multiple equipment labels and safety stickers at Baldy Mesa and Silver Peak were degraded due to weather exposure and aging. Several labels were faded, peeling, or no longer clearly legible. Nitrogen UN1066 hazard signage previously installed on medium voltage transformers throughout the site were observed to be significantly weathered and disintegrated on multiple units. Equipment labeling and hazard signage are necessary to ensure personnel can readily identify equipment, associated hazards, and applicable safety precautions. Degraded labels reduce the effectiveness of hazard communication and may result in improper operation and delayed recognition of hazards during normal work activities or emergency response situations.

Baldy Mesa and Silver Peak must replace degraded equipment labels with durable materials suitable for outdoor conditions. Nitrogen UN1066 signage must be restored on medium voltage transformers where applicable. Baldy Mesa and Silver Peak must implement periodic inspection of equipment labeling and hazard signage to ensure required information remains clearly visible and maintained. Baldy Mesa and Silver Peak must provide ESRB with the implemented signage inspection procedures for verification.





**Finding 13: Site maps contain outdated and inaccurate 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 in part:

*“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*
- c) *Ensures provision of emergency information and materials to personnel*

During the documentation review and site inspection, ESRB inspectors observed that site maps at Baldy Mesa and Silver Peak contain outdated information that does not reflect current site conditions. Inspectors identified gas storage locations that no longer exist and inaccurate muster point designations that do not match the actual locations observed in the field. Accurate site maps are necessary to support safe operations, emergency response, and effective communication of site hazards. Outdated or inaccurate maps may cause confusion during emergency situations and may delay response actions by personnel or first responders. Inaccurate muster point locations induce the possibility of personnel mustering at wrong locations possibly putting them at risk and reducing the ability of site coordination during an emergency.

Baldy Mesa and Silver Peak must review and update site maps to ensure gas storage locations, muster points, and other critical safety information accurately reflect current site conditions. Updated maps must be consistently reflected across all documentation and posted materials to ensure personnel and emergency responders have reliable information. ESRB must be provided with the updated maps for verification.

**Finding 14: Site designated smoking areas are not clearly defined.**

**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 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...”*

During the audit, ESRB inspectors reviewed the ERCP and noted that on page 19 it states, “Smoking on site is permitted only in designated areas.” However, the site orientation did not identify any permitted smoking locations, and the site maps did not identify any designated smoking areas. Baldy Mesa and Silver Peak personnel informed ESRB inspectors that a smoking area is located outside the gate near the muster point. This information was not reflected in the site documentation.

Site safety documents must clearly define whether smoking is allowed on site and, if so, where personnel may smoke. At a solar facility, vegetation can create a potential fire hazard, which makes it especially important to clearly define and control any designated smoking areas. When the plan states that smoking is permitted only in designated areas, but the site orientation and

maps do not identify those areas, site documentation does not provide clear direction to personnel and does not accurately reflect site conditions. This lack of clarity may create confusion regarding where smoking is permitted and may result in inconsistent compliance with site safety requirements.

Baldy Mesa and Silver Peak must clearly establish whether smoking is allowed on site. If smoking is allowed, Baldy Mesa and Silver Peak must identify all designated smoking areas in relevant site documents, including the site orientation, the ERCP, and site maps, as appropriate, to ensure personnel clearly understand where smoking is permitted and to reduce potential fire risk. If smoking is not allowed on site, Baldy Mesa and Silver Peak must revise the relevant documents to clearly state that smoking is prohibited. Baldy Mesa and Silver Peak must submit the updated documents to ESRB for review and verification.

**Finding 15: Vegetation management is not being maintained in accordance with site requirements.**

**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 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 D, OS 12: Operations Conduct** states:

*“To ensure safety and optimize facility availability, the facility conducts operations systematically, professionally, and in accordance with approved policies and procedures. The facility takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow facility and operation procedures and instructions while taking responsibility for safety. Among other things:*

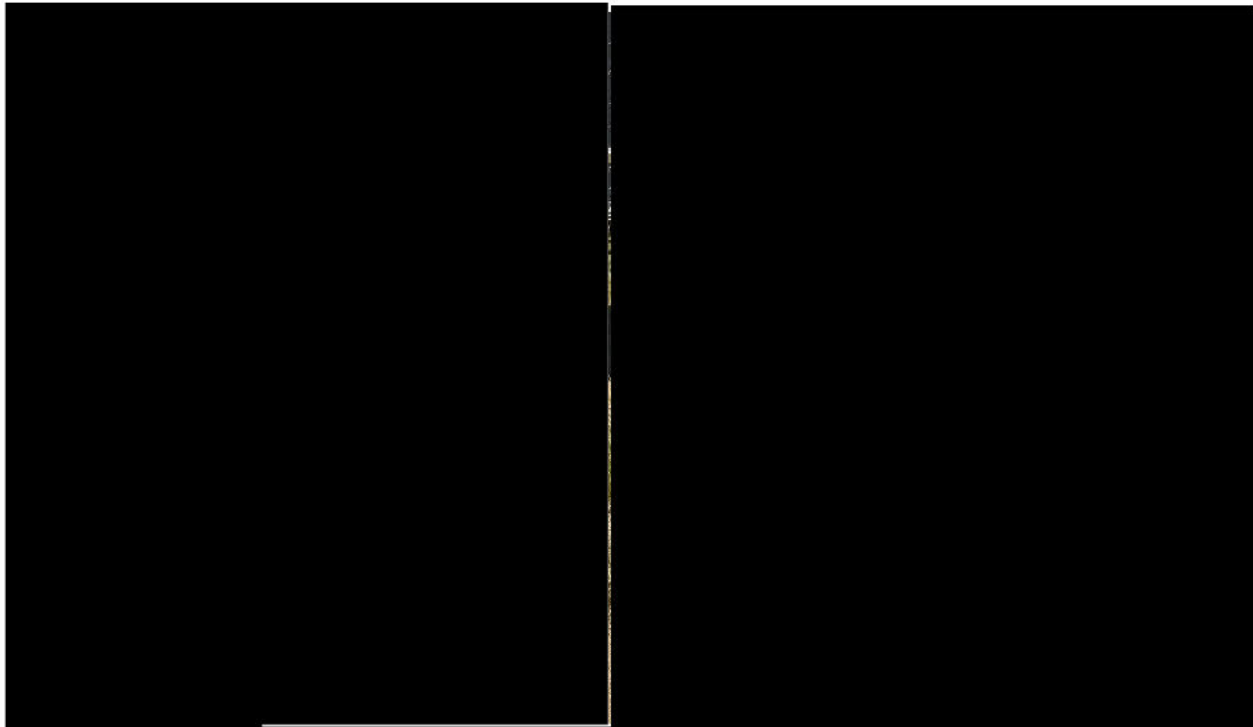
- a) All personnel follow approved policies and procedures. Procedures are current and include a course of action to be employed when an adopted procedure is found to be deficient.*
- b) All operations are performed in a professional manner. Professional conduct applies throughout the facility site at all times.*
- c) All personnel on duty are trained, qualified, and capable of performing their job functions. Personnel are assigned only to duties for which they are properly trained and qualified.*
- d) Personnel take immediate actions to prevent or correct unsafe situations. Anyone shall have the right to stop work if they see an unsafe condition.”*

During the field inspection, ESRB inspectors observed that vegetation management at Baldy Mesa and Silver Peak is not being adequately executed. Tumbleweeds were observed tangled in

wiring, and vegetation height exceeded acceptable levels in multiple areas, including green vegetation exceeding 12 inches and brown shrubs exceeding 4 inches in height. Baldy Mesa and Silver Peak Vegetation Management Responsibility letter states “i) *Dry grass should be maintained 4 inches or less* ii) *Green grass should be maintained 12 inches or less*” Excessive vegetation presents an increased fire risk, may interfere with electrical equipment, and can impede safe access for inspection and maintenance activities. Accumulated tumbleweeds can also create additional fuel loading near energized equipment and restrict airflow around components. Baldy Mesa and Silver Peak must improve vegetation management practices to ensure vegetation height remains within acceptable limits and that tumbleweeds are removed from areas near wiring and equipment.

Baldy Mesa and Silver Peak management expressed concerns about the removal of tumbleweeds in regard to the possibility of nesting birds within the tumbleweeds. Nesting birds is an acceptable reason to not remove a tumbleweed due to California avian regulations but only for tumbleweeds that are actively being nested in. Tumbleweeds must be inspected for avian activity and if found without any signs of nesting swiftly removed from the site. Additionally, Baldy Mesa and Silver Peak Vegetation Management Responsibility letter does not reference avian activity at all and makes no exceptions for tumbleweeds with active nests. Baldy Mesa and Silver Peak must make their procedures clear on when and how items such as tumbleweeds are dealt with on site and what to do when vegetation management observes avian nesting activity in foliage that would otherwise be removed.

Baldy Mesa and Silver Peak must provide an updated vegetation maintenance procedure and provide evidence that the implemented vegetation maintenance procedure is being followed.



**Finding 16: Identified deficiencies were not consistently documented or entered into the work order system in a timely manner.**

**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.”*

During the documentation review, ESRB inspectors reviewed BESS maintenance records provided by Baldy Mesa and Silver Peak, including a [REDACTED]. The spreadsheet did not include an inspection date, so ESRB inspectors could not determine when the inspection was performed. In addition, the notes section for [REDACTED] stated, “HVAC 1 has frozen display screen,” which indicates that personnel identified an equipment issue during the inspection.

During the audit, Baldy Mesa and Silver Peak personnel created a work order for the frozen HVAC screen. However, because the inspection record did not include a date and the work order was created during the audit rather than when the issue was initially identified, Baldy Mesa & Silver Peak Solar could not demonstrate that the deficiency was documented and entered into the work management process in a timely manner. Inspection records must include sufficient information, including the inspection date, to support equipment history and follow-up tracking. When personnel identify equipment deficiencies during inspections, they must promptly document and track those deficiencies through the work order process so Baldy Mesa and Silver Peak can evaluate, prioritize, and resolve them.

Baldy Mesa and Silver Peak must ensure that BESS inspection records include the inspection date and sufficient detail to support equipment history and follow-up tracking. Baldy Mesa and Silver Peak must also ensure that personnel promptly initiate work orders for deficiencies

identified during inspections so that issues are formally tracked through resolution. Baldy Mesa and Silver Peak must submit documentation showing how it reviewed and resolved the frozen HVAC screen issue for [REDACTED] to ESRB for review and verification.

**Finding 17: Weekly inspections were not conducted in accordance with Spill Prevention, Control, and Countermeasure (SPCC).**

**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.”*

**40 Code of Federal Regulations (CFR) §112.7(e)** states in part:

*“Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years.”*

During the documentation review, ESRB inspectors reviewed the Baldy Mesa & Silver Peak SPCC Plan, which states in Section 7, under General Inspections, that *“Inspections include weekly, monthly, and annual inspections (40 CFR 112.7[e]).”* Baldy Mesa & Silver Peak provided records demonstrating that monthly and annual SPCC inspections are being conducted. However, Baldy Mesa & Silver Peak did not provide documentation demonstrating that weekly SPCC inspections are being performed. Only monthly and annual inspection records were available for review.

Weekly SPCC inspections are required to verify the comprehensive condition of oil containing equipment, secondary containment systems, and overall spill prevention measures. Failure to perform and document weekly inspections may result in undetected deficiencies and further limits the facility's ability to demonstrate compliance with its SPCC plan and applicable regulatory requirements. The lack of weekly SPCC inspections also demonstrates that Baldy Mesa & Silver Peak are not following all requirements within their implanted SPCC. Baldy Mesa & Silver Peak must ensure that weekly SPCC inspections are conducted in accordance with the SPCC Plan, all applicable regulatory requirements, and that the implemented SPCC is followed. Baldy Mesa & Silver Peak must also ensure that all inspections are properly documented and retained. Baldy Mesa & Silver Peak must submit documentation of completed weekly SPCC inspections and the updated SPCC plan if any changes are made to the document.

**Finding 18: Job Safety Analysis (JSA) audit requirements are not being performed as required by the program.**

**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 in part:

*"Operation procedures and documents are clear and technically accurate, provide appropriate direction, and are used to support safe and reliable plant 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."*

During the documentation review, ESRB inspectors observed that the JSA program includes a requirement to periodically audit completed JSAs. However, these audits are not being performed. The absence of JSA audits limits the site's ability to verify that JSAs are being completed accurately, consistently, and in accordance with program expectations. Baldy Mesa and Silver Peak must follow implemented procedures as they are written. The JSA currently in place at Baldy Mesa and Silver Peak states in section 7.2 *"Regular reviews are performed on complete JSAs at least annually. The review is documented by entering a new review date on the JSA and uploading it to ePAS and sitedocs."* JSA audits are intended to ensure that pre-task hazard analyses remain effective, properly identify required safety controls, and support continuous improvement of the safety program. When audit requirements defined within the

program are not followed, deficiencies in JSA completion may go unidentified and uncorrected.

Baldy Mesa and Silver Peak must ensure that JSA audits are performed in accordance with the program requirements. If the current audit requirements are no longer applicable, the JSA program must be formally revised to accurately reflect the process being followed. Documentation of completed audits or program revisions must be provided to ESRB for verification.

**Finding 19: Risk Assessment documents required by the Operations & Maintenance (O&M) ERCP were not present in onsite vehicles.**

**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 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...”*

During the audit, ESRB inspectors reviewed the Baldy Mesa and Silver Peak Clean Energy O&M ERCP and noted that the plan states, *“Emergency Response Plans and Emergency Identification and Risk Assessment is also posted in the O&M Building or onsite vehicles.”* However, during the site inspection, ESRB inspectors observed that the onsite vehicles did not contain the Risk Assessment documents. [REDACTED]

Emergency response documents must be maintained where the ERCP states they will be available so that personnel can readily access site-specific emergency information during field activities and emergency conditions. When the ERCP states that risk assessment documents are maintained in onsite vehicles, but the documents are not actually present, the plan does not accurately reflect current site conditions and personnel may not have immediate access to critical safety information during emergency response or field activities. Emergency response documentation must accurately reflect site practices and ensure that required safety information is readily available to personnel when needed.

Baldy Mesa & Silver Peak Solar must ensure that the ERCP accurately reflects current site practices and document locations. When the ERCP requires risk assessment documents to be maintained in onsite vehicles, the facility must ensure the documents are present and maintained in those vehicles at all times.. Updated documentation or evidence of implementation must be submitted to ESRB for review and 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          | 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)                                                                  |
|                               | 42 | Emergency Generator Test and Maintenance Records (last 5 years)                                   |
|                               | 43 | Substation Battery Test and Maintenance Records (last 5 years)                                    |
|                               | 44 | Vegetation Management Procedure and Policy                                                        |
|                               | 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                                                        |

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



|                              |    |                                                                                              |
|------------------------------|----|----------------------------------------------------------------------------------------------|
| 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.