CPUC Audit Findings of Maverick Solar & BESS

Feb 9 – Feb 12, 2026

GA2026-01MW

Corrective Actions and Planned Actions

By

EDF power solutions Services, Inc.

May 18, 2025

Finding	Description	Status	Completion/Projected Completion Target Date
1	O&M Building fire suppression system issues not adequately tracked or resolved.	In Process	6/15/2026
2	Inadequate documentation retention practices	Closed	5/6/2026
3	Maverick requires 5-year arc flash analysis review	Closed	5/14/2026
4	Orientation and posted emergency information contain outdated contact information	Closed	2/12/2026
5	Safety Data Sheet (SDS) inventory is incomplete and inconsistent across platforms	In Process	5/29/2026
6	Site wide muster points are not clearly identified	Closed	4/15/2026
7	SPCC Plans for Maverick 1 and Maverick 4 require update to reflect accurate oil-containing equipment volumes	Closed	5/14/2026
8	Annual spill kit inspection logs are not being completed	In process	5/29/2026
9	Weekly SPCC inspections at the O&M Building are not being performed as required by the SPCC plan	Closed	5/14/2026
10	Hazardous waste drums are missing required accumulation start date and facility information	Closed	4/23/2026
11	Routine inspection findings are not consistently reviewed or addressed by management.	Closed	3/1/2026
12	BESS inspections do not align with OEM recommendations	Closed	5/14/2026
13	First responder documentation cabinet not installed at the BESS entrance	Closed	4/15/2026
14	Contact informatino on BESS placards does not reflect current authorized personnel information	In process	7/31/2026

Finding 1; Page 1

<u>Finding 1:</u> Fire suppression system issues at O&M Building not adequately tracked or resolved.

GO 167-C Reference	GO 167-C Definition
General Order 167-C, Appendix D, Operation Standard (OS) 1: Safety states:	"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."
GO 167-C, Appendix D, OS 11: Operations Facilities, Tools, and Equipment states:	"Facilities and equipment are adequate to effectively support operations activities, including housekeeping, tool storage, and equipment storage. Physical separation such as, but not limited to, egress requirements, clearance for electrical equipment, and ESS equipment shall be maintained."
Persons Responsible	**Notes**
Luis Barron	The FSS issues identified by the ESRB are associated with the O&M building.

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Past failures of O&M Building FSS not adequately tracked or supported by sufficient corrective action documentation. Recordkeeping associated with past FSS inspections is incomplete and lacks detail. Deficiencies must be clearly documented, tracked to completion, and supported by evidence.	- Implemented: The fire box located on site inside the O&M building for secure storage of inspection records has been updated with the latest documents. Completed March 2026. - Implemented: Created formal location for storing O&M building FSS inspections, deficiencies, and correctives on an internally shared database. Completed April 2026. - Implemented: Task built into Field Service Management (FSM) tool for consistent tracking and completion of inspections by site management. - Implemented: Unity task created for consistent tracking of inspections by asset management. Completed May 2026. ○ Unity (formerly Bluepoint) is a comprehensive asset management platform designed to streamline asset-related tasks used by EDFps.

	- Implemented: The O&M FSS was inspected and successfully passed on 4/21/2026. Documentation has been provided to ESRB. All deficiencies identified in previous reports were corrected. - In Process: A few weeks after the April 2026 inspection, an issue was detected with the diesel engine mounted to the O&M building's fire pump. The repair is scheduled for May 27, 2026, and once completed, the full capability of the FSS will be restored.

Finding 2; Page 1

<u>Finding 2:</u> Inadequate documentation retention practices.

GO 167-C Reference	GO 167-C Definition
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 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 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."
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Document retention practices are not centralized, with records dispersed rather than	- Implemented: The site transitioned to a centralized maintenance tracking and

maintained within a controlled document management system. Some critical records from past years were missing.	database system using Field Service Management and Power BI, achieving full site adoption in Q3 2025. This system focuses on maintaining current and future documents and does not intend to correct past years. - A summary from EDFps' Continuous Improvement team has been submitted to ESRB, detailing how these systems enhance management, record retention, and the centralization of documents. This was completed May 6th, 2026.

<u>Finding 3:</u> Maverick 1 and Maverick 4 Arc Flash analysis for substation equipment not conducted since August 2020

GO 167-C Reference	GO 167-C Definition
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 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."
National Fire Protection Association (NFPA) 70E: 130.5 Arc Flash Risk Assessment states in part:	"The incident energy analysis shall be updated when changes occur in the electrical distribution system that could affect the results of the analysis. The incident energy analysis shall also be reviewed for accuracy at intervals not to exceed 5 years."
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Almasol substation displayed a study date of 8/4/2020	- Implemented: EDFps Services' Professional Engineer (PE) from its High Voltage team performed a review of the Maverick substation arc flash analysis on May 14, 2026. The PE letter has been submitted to ESRB. - Implemented: Unity task created for consistent tracking of annual inspections

	- Reviewed arc flash analysis documentation submitted to ESRB. Effective date of the review: May 14, 2026.

<u>Finding 4:</u> Orientation and posted emergency information contain outdated contact information

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix D, OS 1: Safety states:	"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."
GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:	"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."
GO 167-C, Appendix D, OS 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.”
Persons Responsible	**Notes**
Luis Barron	Onsite materials were remedied by the conclusion of the audit in February.

Finding Evidence	**Proposed Planned Action/Implemented Corrective Action by EDFps Services**
Orientation materials contained outdated contact information and did not reflect current roles. Similar discrepancies are present within the ERP.	- Implemented: EDFps Health, Safety, Environmental & Sustainability (HSES) team updated the Maverick Emergency Preparedness Plan (ERP) to reflect updated site contact sheet on May 15, 2026.

Finding 5; Page 1

<u>Finding 5:</u> Safety Data Sheet (SDS) inventory is incomplete and inconsistent across platforms

GO 167-C Reference	GO 167-C Definition
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…"
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Discrepancies between chemicals listed in the online SDS database, the physical SDS binder, and chemicals physically present.	- Implemented: Propane SDS added to the physical binder in March 2026. - In Process: The EVE and CATL battery SDSs will be added to the electronic database once Velocity (the platform used to house EDFps SDS records) includes these two battery types in their master library. EDFps has submitted a manual request for Velocity to add EVE and CATL, with an expected resolution by the end of May. - Excluding EVE and CATL, EDFps HSES confirms that the SDS inventory has been reviewed, reconciled, and updated.

<u>Finding 6:</u> Site wide muster points are not clearly identified.

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix D, OS 1: Safety states:	"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."
GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:	"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."
GO 167-C, Appendix D, OS 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.”
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Muster points for the operations building were found to be adequate but site wide muster points covering the solar and BESS portions are not clearly marked on a site map or identified in the field	- Implemented: New, clearly marked muster points were placed in the field in early April. - Implemented: The ERP and site maps have been updated to reflect the new muster points and clearly indicate their locations.

<u>Finding 7:</u> Spill Prevention, Control, and Countermeasure (SPCC) Plans for Maverick 1 and Maverick 4 require update to reflect accurate oil-containing equipment volumes

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix C, MS 16: Regulatory Requirements states:	"Regulatory compliance is paramount in the operation of the facility. Each regulatory event is properly identified, reported and appropriate action is taken to prevent recurrence."
GO 167-C, Appendix D, OS 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…"
Persons Responsible	**Notes**
Luis Barron	The PE confirmed that this was a clerical error and there is no need for the SPCC Plans to be recertified following this correction.

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Maverick 1 and Maverick 4 inverter oil volumes listed incorrectly in the SPCC Plans	- Implemented: EDFps HSES team engaged an External PE firm to update the SPCC plans for Maverick 1 and Maverick 4 with the correct inverter oil volumes. This change was effective on May 14, 2026. - EDFps submitted updated SPCC plans for review to ESRB.

<u>Finding 8:</u> Annual spill kit inspection logs are not being completed

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix D, OS 13: Routine Inspections states in part:	"Routine inspections by facility personnel ensure that all areas and critical parameters of facility operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed. 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..."
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."
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Annual spill kit inspection logs are not being completed.	- Implemented: Inspection log reflects latest inspection date of October 13, 2025. Next inspection will take place in October 2026. - In Process: Tracking mechanism to ensure the annual spill kit inspection is captured is in progress. The inspection form was submitted internally in April and was approved in May. As of May 18th, it is in the queue for publishing. Documentation proving completion is expected to be submitted to ESRB by May 29th, 2026.

Finding 9; Page 1

<u>Finding 9:</u> Weekly SPCC inspections at the O&M Building are not being performed as required by the SPCC Plan.

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix C, MS 16: Regulatory Requirements states:	"Regulatory compliance is paramount in the operation of the facility. Each regulatory event is properly identified, reported and appropriate action is taken to prevent recurrence."
GO 167-C, Appendix D, OS 13: Routine Inspections states in part:	"Routine inspections by facility personnel ensure that all areas and critical parameters of facility operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed. 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…"
Persons Responsible	**Notes**
Luis Barron	The PE confirmed that changing the inspection frequency from weekly to monthly in the SPCC Plans is non-technical and does not require PE approval.

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
SPCC Plan states inspections of the equipment and storage at the O&M Building will be performed weekly and whenever material repairs are made.	- Implemented: EDFps found that only Maverick 6 and Maverick 7 SPCC Plans listed weekly inspections. An external PE confirmed this was based on an EDF form, not regulations or PE recommendations. To align with the rest of the fleet and standardize documentation, EDFps HSES revised the inspection frequency to monthly on May 14, 2026. - Updated SPCC Plans for Maverick 6 and Maverick 7 have been submitted to ESRB for review. - A tracking mechanism for monthly inspections was already in place; therefore, no changes are necessary.

<u>Finding 10:</u> Hazardous waste drums are missing required accumulation start date and facility information.

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:	"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."
GO 167-C, Appendix D, OS 10: Environmental Regulatory Requirements states in part:	"Environmental regulatory compliance is paramount in the operation of the facility...
Title 22, California Code of Regulations (CCR), section 66262.16(b)(4)(A)5 states in part:	"A small quantity generator shall mark or label its containers with the following: 4. The name and address of the person generating the waste; 5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container..."
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Hazardous waste drums did not include required labeling information, including the accumulation start date and facility identification information.	- Implemented: The oil inside the waste drums shown was determined to be unnecessary on site. The oil was removed in April, and the manifest was finalized on April 23, 2026. The manifest has been submitted to the ESRB for review. Maverick confirms that there is no hazardous waste on site as of May 18th, 2026. "Empty" signs have been ordered to ensure that the waste drums are being clearly labeled as empty. - Implemented: If any hazardous waste arrives on site, there is a process in place with EDFps HSES team to label it with the accumulation start date and facility identification information.

Finding 11; Page 1

<u>Finding 11:</u> Routine inspection findings are not consistently reviewed or addressed by management.

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix C, MS 3: Maintenance Management and Leadership states:	"Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities."
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 14: Engineering and Technical Support states:	"Engineering and technical support activities are conducted such that equipment performance is optimized for reliable facility operation. Engineering and technical support implements industry best practices, lessons learned, proven safety measures, and technical information necessary for the facility to be operated and maintained within the operating parameters defined by facility design."
GO 167-C, Appendix D, OS 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.”
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	**Proposed Planned Action/Implemented Corrective Action by EDFps Services**
Inspectors observed that routine inspections are not consistently reviewed or addressed by management. No formal management review process for field inspection results was evident at the time of the audit.	- Implemented: EDFps does have a formal management review process for field inspection results, known as Technical Completion (TECO). The TECO process is mandatory and must be completed within 5 business days of the job completion. The site manager is responsible for performing the TECO process as well as executing, overseeing, or delegating pre-TECO tasks to ensure compliance, utilizing a thorough understanding of referenced protocols. - EDFps’ TECO process has been submitted to the ESRB for review.

Finding 12: BESS inspections do not align with Original Equipment Manufacturer (OEM) recommendations.

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix C, MS 1: Safety states:	"The protection of life and limb for the work force is paramount. The company behavior ensures that individuals at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment, and the policies and procedures foster such a safety culture, and the attitudes and behaviors of individuals are consistent with the policies and procedures."
GO 167-C, Appendix C, MS 9: Conduct of Maintenance states:	"Maintenance is conducted in an effective and efficient manner, so equipment performance and material condition effectively support reliable facility operation."
GO 167-C, Appendix C, MS 10: Work Management states:	"Work is identified and selected based on priority to maintaining reliable facility operation. Work is planned, scheduled, coordinated, controlled, and supported with resources for safe, timely, and effective completion."
GO 167-C, Appendix D, OS 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."
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
Certain monthly inspections required by the OEM manual were not completed or documented. Site maintenance activities do not consistently align with OEM recommendation.	- EDFps Engineers reviewed the OEM manual and explained the variances between the OEM recommendations and the implemented maintenance in a letter dated May 14th, 2026. They confirmed that the current maintenance schedules exceed OEM recommendations and are based on accepted safety principles, industry best-practices, OEM recommendations, and EDFps experiential intellectual property.

	- Current maintenance schedules provided to ESRB for review.

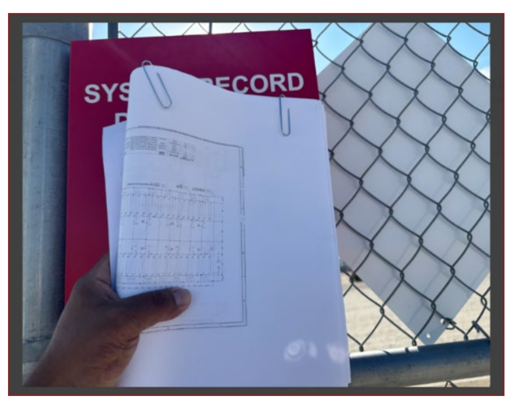
Finding 13; Page 1

<u>Finding 13:</u> First responder documentation cabinet not installed at the BESS entrance

GO 167-C Reference	GO 167-C Definition
GO 167-C, Appendix D, OS 1: Safety states:	"The protection of life and limb for the work force is paramount. GAOs and ESSOs have a comprehensive safety program in place at each site. The company's behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."
GO 167-C, Appendix D, OS 8: Plant Status and Configuration states:	"Facility activities are effectively managed, so the facility status and configuration are maintained to support safe, reliable, and efficient operation."
GO 167-C, Appendix D, OS 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.”
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:
Persons Responsible	**Notes**
Luis Barron	The cabinet contents will be reviewed periodically to ensure they remain accurate and complete.

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
BESS area does not have first responder documentation cabinet installed at the entrance.	- Implemented: First responder documentation cabinet has been installed at the BESS entrance and contains ERP, site map, and emergency contact info. Photographic evidence provided below.



Finding 14; Page 1

<u>Finding 14:</u> Contact information on BESS placards does not reflect current authorized personnel information as required by approved fire protection drawings

GO 167-C Reference	GO 167-C Definition
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"
Persons Responsible	**Notes**
Luis Barron	

Finding Evidence	Proposed Planned Action/Implemented Corrective Action by EDFps Services
The contact information displayed on BESS placards placed on the entry doors of the containers did not reflect current authorized service personnel information.	- Planned: Before purchasing new placards, for which quotes have been obtained from two vendors, EDFps is considering removing the placards from the containers and instead installing a single sign with updated contact information at the BESS gate. This approach may improve emergency responders' access to contact details. Decision has yet to be made. Current target completion date: July 2026.