Response to the GA2026-02FS CPUC Audit Findings for Fifth Standard Solar PV, LLC
Audit Date: February 23-26, 2026

Dear Mr. Villalobos,

RWE Americas, LLC ("RWEA") writes in response to the California Public Utilities Commission's ("CPUC") audit report dated April 21, 2026 ("Audit Report"), which contains the February 2026 Electric Safety and Reliability Branch ("ESRB") audit findings ("Findings") for Fifth Standard Solar PV, LLC ("FST"), a wholly owned subsidiary of RWEA. As instructed by the CPUC, FST's Corrective Action Plan which includes corrective and preventative measures taken and/or planned to be taken to resolve the issues described in the Findings is outlined below:

1. **Installation of battery energy storage system (BESS) containers do not follow Original Equipment Manufacturer spacing requirements**

   RWEA Response: [REDACTED] *RWEA will formalize this confirmation into a site-specific maintenance procedure that explicitly documents how all required inspections and maintenance tasks identified in the OEM manual can be accomplished from front access. This procedure will be submitted to ESRB by September 2026.*

   Supporting documentation can be found in the uploaded folder named "Evidence", under the file names listed below.

   > *"01-Communications with LG (1 of 2)"*
   > *"01-Communications with LG (2 of 2)"*

2. **The Plant exhibited inadequate maintenance practices**

   RWEA Response: *The FST O&M team is collaborating with the RWEA Maintenance and Coordination department to review the current Balance of Plant maintenance practices and make revisions that will better align with OEM Manuals, RWEA Best Practices, and GO 167C requirements.*

   The following improvements are in progress: 1) Integration of contractor maintenance records into SAP, 2) Development of more comprehensive SAP entry standards, 3) Improved Work Order Notifications and Management procedures. These revisions are anticipated to be completed by September 2026.

3. **The Plant does not submit outage reports to the California Public Utilities Commission's ("CPUC") Power Plant Outage Report**

RWEA Response: *On June 3, 2026, the FST O&M team completed refresher training on PPOR reporting using CPUC's PPOR Outage Report Reporting Instructions document.*

Supporting documentation can be found in the uploaded folder named "Evidence", under the file names listed below:

> *"03 – PPOR Training Acknowledgement Form"*
> *"03 – CPUC PPOR Outage Reporting Instructions-1017-1-"*

4. The Plant must improve emergency response preparedness and coordination

RWEA Response: *The FST O&M team conducted onsite Coordination and site-specific Emergency Response Preparedness drills, with CALFIRE and Fresno County Fire Department, on April 27 and 30, 2026.*

Participants were satisfied with the contents and execution of the ERP. A recommendation was made to O&M personnel to ***[REDACTED]***

Additionally, RWEA has revised the ERP to update contact information for internal and external contacts to reflect the current Site Manager, as well as current O&M personnel, and has provided FST with an updated copy to have onsite.

The Emergency Response Preparedness drill and Site-specific ERP training were documented via the training rosters included in the supporting evidence.

Supporting documentation can be found in the uploaded folder named "Evidence", under the file names listed below:

> *"04 – New Site Safety Orientation Training Roster (1 of 2)"*
> *"04 – New Site Safety Orientation Training Roster (2 of 2)"*
> *"04 – Weather Preparedness Training Roster"*
> *"04 – Site Emergency Response Plan (ERP) – Fifth Standard"*

5. The Plant's control and storage of hazardous chemicals must be improved

RWEA Response: *On May 21, 2026, the FST O&M team completed refresher training on the control and storage of hazardous chemicals as well as the process of entering chemicals into the SDS database.*

On February 25, 2026, O&M personnel reviewed hazardous chemicals onsite after auditors determined that Nu-Brite was not in the SDS database for the Plant. The Nu-Brite was added to the SDS database by the Senior Manager of HSSE Operations and

Project Execution of West Region while the ESRB auditors were onsite. Evidence of the addition was also provided to auditors at the time of the correction.

Additionally, O&M personnel have identified NPFA 704 hazard identification signage that requires replacement and is currently working to replace faded signs throughout the Plant. Task is anticipated to be completed by August 2026.

On March 31, 2026, the FST O&M team replaced the flammable storage locker #2 with a new locker with working auto-closing door latches.

All flammable materials have been removed from atop the flammable storage locker as well as the storage containers onsite.

Propane was removed from the flammable storage locker to comply with NFPA 58.

Supporting documentation can be found in the uploaded folder named "Evidence", under the file names listed below:

"05 – ESH 4.17 Hazcom Training Presentation"
"05 – Hazcom Training Acknowledgement Form"
"05 – Fifth Standard SDS Database Documentation"
"05 – Hazard Signage and Barriers Training Acknowledgement Form"
"05 – EHS 4.18 Signs and Barriers Training Presentation"
"05 – Evidence of Self-Closing Latch Door Flammable Storage Locker"
"05 – Removal of Flammable Materials Stored on top of Containers"
"05 - Evidence of Removal of Propane Tanks from Flammable Storage Lockers"

6. **Identification of safety hazards at the Plant is not adequate.**

RWEA Response: *On March 26, 2026, the FST O&M team identified and marked the gate catches and concrete pads as trip hazards. The gate catches were painted bright yellow, while a yellow cone was placed on the concrete pads in the interim of having the pads permanently painted. The painting is anticipated to be completed by August 2026.*

Signage identifying the location of lead-acid batteries has been ordered and will be affixed to the outside of the substation building upon its delivery. O&M personnel have identified hazard identification signage that requires replacement and is currently working to replace faded signs throughout the Plant. Task is anticipated to be completed by August 2026.

Supporting documentation can be found in the uploaded folder named "Evidence", under the file names listed below:

"06 – Trip Hazards identification"

7. **Evaluation and resolution of dissolved gas analysis reports is not adequate**

RWEA Response: *RWEA acknowledges the deficiencies identified in Finding #7 and is taking the following corrective actions:*

PB-06 and PB-36 (which were recommended for investigation): RWEA Engineering is actively evaluating the Equipment Summary Reports for transformers PB-06 and PB-36, which SDMyers has flagged for investigation due to elevated ethylene and acetylene levels indicative of severe or sustained internal hot spots. Engineering's evaluation and recommended corrective actions will be submitted to ESRB by September 2026.

6-Month Retest Backlog (65 Units): New DGA samples were collected across the affected transformers on May 20, 2026, and submitted to RWEA Engineering and SDMyers for analysis. RWEA will implement all recommendations received. Results and a remediation plan will be submitted to ESRB by September 2026. Going forward, RWEA will implement a formal DGA follow-up protocol requiring Engineering review and work order closure sign-off for all retest and investigation-level findings.

8. **The Plant does not have an Injury and Illness Prevention Program ("IIPP")**

RWEA Response: *RWEA acknowledges that the IIPP development timeline has extended beyond the April 2026 estimate provided during the audit. Currently, HSSE department is actively reviewing RWEA's IIPP and will follow company processes to complete the document. RWEA remains committed to completing and publishing the IIPP by September 2026.*

9. **Information in the Spill Prevention Control and Countermeasure ("SPCC") plan is out of date, and inspections are not being documented adequately.**

RWEA Response: [REDACTED] *was onsite on March 3, 2026, to review current hazardous materials and SPCC plan. On March 26, 2026,* ***[REDACTED]*** *provided RWEA with the revised SPCC draft for review and approval. The draft was approved on May 11, 2026, and sent back to* ***[REDACTED]*** *to finalize the document. RWEA anticipates receiving the final stamped copy of FST's SPCC by the end of June 2026.*

Additionally, RWEA is reconciling the discrepancy between the oil volume stated in the SPCC (16,695 gallons) and the insurance underwriting report (13,880 gallons). The correct volume will be reflected in the finalized SPCC.

10. **Health, Safety, Security, and Environmental ("HSSE") documents must be kept up to date.**

RWEA Response: *RWEA is specifically addressing the documents identified in Finding #10. HSSE department is currently reviewing all its management system documents, including the documents noted in Finding #10, to update and structure them in accordance with the company directive on control of governing content which sets out minimum standards by which RWEA governing content is developed, drafted, reviewed, approved, distributed, and accessed. This work is expected to be completed by the end of 2026, and the relevant documents will be provided to ESRB upon completion.*