



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102

July 23, 2026

Prakash Singh
Senior Plant Manager, Gateway Generating Station
Pacific Gas and Electric Company

SUBJECT: General Order (GO) 167-C Audit of Gateway Generating Station, Audit Number GA2026-09GA

Dear Mr. Singh:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Christopher Villalobos, Ryan Hart, Ian Rawnsley, and Grady Watkins conducted a Generation Audit of Gateway Generating Station from June 22 through 25, 2026.

During the audit, ESRB 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 August 20, 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 for 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 Christopher Villalobos at Christopher.Villalobos@cpuc.ca.gov. Please note that although Gateway Generating Station has 20 business 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 Gateway Generating Station 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 Christopher Villalobos, and the GO 167 inbox at GO167@cpuc.ca.gov by August 20, 2026.

Please note that ESRB will also post the Gateway Generating Station 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.

Thank you for your courtesy and cooperation throughout the audit process. If you have any questions concerning this audit, please contact Christopher Villalobos at Christopher.Villalobos@cpuc.ca.gov or (916) 268-7732.

Sincerely,



Banu Acimis, 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 Enforcement, Safety Policy, and Water CPUC
Koko Tomassian, Director of Safety Enforcement Division (SED), CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Ryan Hart, Senior Utilities Engineer, Supervisor, ESRB, SED, CPUC
Christopher Villalobos, Utilities Engineer, ESRB, SED, CPUC
Ian Rawnsley, Utilities Engineer, ESRB, SED, CPUC
Grady Watkins, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF Gateway Generating Station June 22 - 25, 2026

I. Findings Requiring Corrective Action

Finding 1: Firewater piping for the transformer deluge does not have the required red identification or marking.

General Order (GO) GO 167-C, Appendix D, Operation Standard (OS) 28: Equipment and Systems states:

“GAO or ESSO complies with these Operation Standards (1-28) considering the design bases (as defined in the Appendix) of facility equipment and critical systems. The GAO or ESSO considers the design basis of facility equipment when as required by other standards it, among other things:

- a) Establishes procedures for the operation of critical systems at each unit (OS 7);*
- b) For each system, identifies critical parameters that require monitoring (OS 8 and 13);*
- c) For each critical parameter, establishes value at which to increase observation of the system or take actions to protect it (OS 8 and 13);*
- d) Assures that systems are monitored, and actions are taken (OS 8 and 13);*
- e) Establishes parameters for operation during periods of stress or shortage on the state’s electric grid (OS 9 and 19); and f) Assures that personnel operating critical systems are trained and qualified (OS 6).”*

Guidelines to Standard 28: Equipment and Systems states in part:

“Z. Fire Protection System

1.General Guidelines: The fire protection system is maintained and operated to protect plant systems in conformance with applicable laws and regulations.

2.Detailed Guidelines: In developing its plans, procedures, and training programs to comply with the Operating Standards, the GAOs should consider the following issues

f. Fire Protection Equipment Markings: Fire protection equipment, including but not limited to fire blanket boxes, pumps, hose locations, hydrants, sirens, and extinguishers, are painted red.”

Electric Safety and Reliability Branch (ESRB) Inspectors identified that Gateway Generating Station’s (Plant) large Generator Step-Up (GSU) and auxiliary transformers were equipped with deluge fire suppression systems. The piping that transports firewater to the transformers is not

painted red or did not have demarcations identifying the pipes as “Fire Water.” The Plant must paint or identify the firewater piping on all GSU and auxiliary transformers deluge systems.



Figure 1: View of transformers with deluge-style fire suppression systems.



Figure 2: Deluge piping not adequately identified.

Finding 2: The condition of variable spring pipe hangers and supports must be improved.

GO 167-C, Appendix C, Maintenance Standard (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 8: Plant Status and Configuration states:

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

GO 167-C, Appendix D, OS 13: Routine Inspections states 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.”

ESRB Inspectors identified several variable spring pipe hangers and supports did not have adequate markings that identify hot (red) or cold (white) operating conditions. The lack of markings hinders the Plant's ability to perform visual inspections of the High Energy Piping (HEP) to ensure they are within range of the operating parameters. Additionally, ESRB Inspectors identifies multiple variable spring pipe hangers that were found outside of their designated travel ranges, resulting in unexpected deflection or stress in the pipe network. To address these issues, the Plant must plan and conduct an inspection of the variable spring pipe hangers and supports to identify and adjust pipe hangers and supports that are found outside of their travel range. The Plant must also replace missing or deteriorated markers to enable personnel to readily identify discrepancies during daily rounds or routine inspections.



Figure 3: Pipe hanger without hot indications (Steam turbine deck).

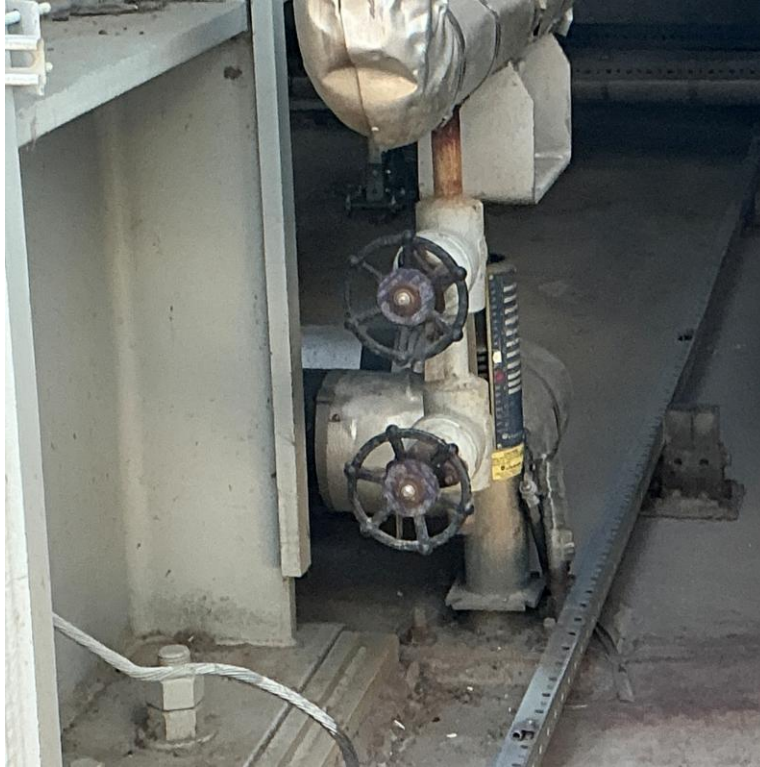


Figure 4: Spring level is exceeding the cold (white) indication (Feed water drain valve).



Figure 5: Pipe support exceeding hot condition.

Finding 3: Safety swing-gates on elevated platforms did not self-close.

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 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.”

ESRB Inspectors tested the functionality of self-closing safety swing-gates and identified two gates on elevated surfaces that did not close automatically. When ESRB opened and released the swing-gate, the gate remained ajar. The Plant must maintain automatically closing gates to block fall hazards on elevated work areas and permanently constructed ladders. During the site visit, the Plant resolved this issue and ESRB verified that the swing-gates closed automatically. As a corrective action, the Plant must plan and conduct an inspection of all the swing gates and test them to ensure each swing gate automatically closes.

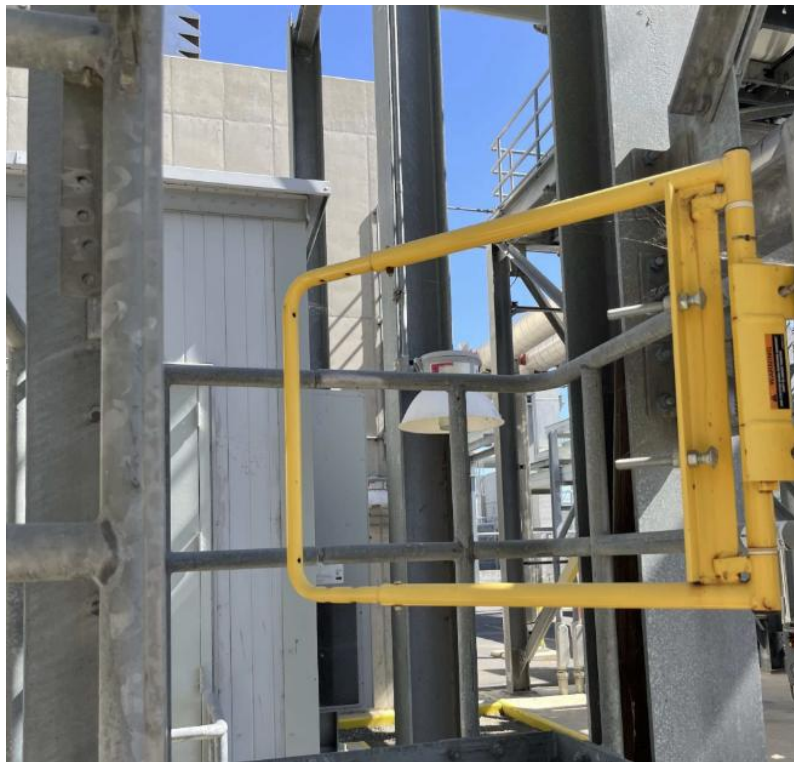


Figure 6: Staged swing-gate open on elevated platform.



Figure 7: Staged swing-gate open on Heat Recovery Steam Generator (HRS) deck.

Finding 4: Flammable storage lockers did not automatically latch closed.

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.”

National Fire Protection Association (NFPA) 30, Flammable and Combustible Liquids Code, Chapter 9, Storage of Ignitable Liquids in Containers states in part:

“9.5.3 (2) (d) New cabinets shall have self-closing doors.”

ESRB Inspectors identified two flammable storage lockers that did not self-close and latch. After opening and inspecting the flammable storage cabinet, ESRB Inspectors released the doors to test the closing and latching function. As shown in Figure 8 and Figure 9, the flammable storage lockers did not successfully latch to fully close. During ESRB’s inspection, the Plant corrected this issue, and ESRB verified the flammable storage locker closed and latched automatically.



Figure 8: Flammable Storage Locker not latched.



Figure 9: Flammable Storage Locker not latched.

Finding 5: Signage identifying hazards at the Plant is inadequate.

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.”

NFPA 704 Hazardous Material Identification Chapter 4 - General states in part:

“4.2 Assignment of Ratings

4.2.3.3 Where more than one chemical is present in a building or specific area, professional judgment shall be exercised to indicate ratings using the following methods:

- (1) Composite Method. Where many chemicals are present, a single sign shall summarize the maximum ratings contributed by the material(s) in each category and the special hazard category for the building and/or the area.*
- (2) Individual Method. Where only a few chemicals are present or where only a few chemicals are of concern to emergency responders (taking into account factors including physical form, hazard rating, and quantity), individual signs shall be displayed. The chemical name shall be displayed below each sign.*
- (3) Composite–Individual Combined Method. A single sign shall be used to summarize the ratings via the Composite Method for buildings or other areas containing numerous chemicals. Signs based on the Individual Method shall be used for rooms or smaller areas within the building containing small numbers of chemicals.”*

“4.3 Location of Signs

Signs shall be in locations approved by the authority having jurisdiction and as a minimum shall be posted at the following locations:

- (1) Two exterior walls or enclosures containing a means of access to a building or facility*
- (2) Each access to a room or area*
- (3) Each principal means of access to an exterior storage area”*

ESRB Inspectors identified deficiencies in the signage used to communicate various types of hazards at the Plant. Signage throughout the Plant was damaged, illegible, insufficient, or missing. The Plant must correct the issues identified below by repairing or replacing the signage.

- A. ESRB Inspectors identified several chemical storage lockers that are missing NFPA 704 placards. These lockers contain flammable and other hazardous material and must be

identified with an NFPA 704 placard on the locker or on the entrance to the area containing the storage lockers.



Figure 10: NFPA 704 Placard is not on a flammable storage locker.



Figure 11: Example of material in the flammable storage lockers at the Plant.

- B. Safety signage, including danger signs and NFPA 704 placards are damaged and degraded. Several examples of deteriorated signage at the Plant are shown below. The Plant must conduct an inspection to identify safety signage issues that require repair or replacement. The Plant must routinely monitor the condition of signage around the Plant and replace it as necessary to ensure visibility and availability for the Plant staff, contractors, first responders, and other visitors.



Figure 12: Sign stating “Burn Hazard” is not visible.

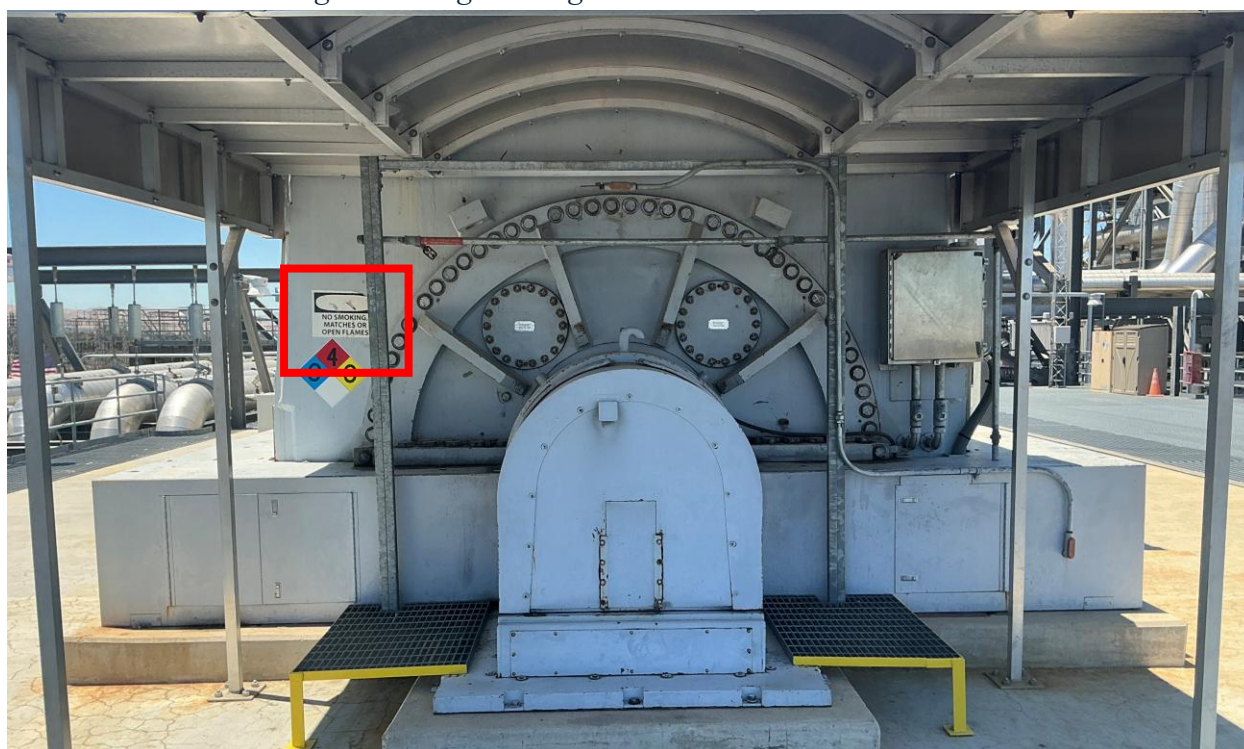


Figure 13: Sign stating “No Smoking Matches or Open Flames” is in poor condition on Steam Turbine



Figure 14: Sign stating “No Smoking Matches or Open Flames” is in poor condition on generator.



Figure 15: Color-faded on NFPA 704 Placard.



Figure 16: Color-faded on NFPA 704 Placard.



Figure 17: Sign identifying a battery charging station is degrading.



Figure 18: Illegible warning signs.

Finding 6: The Plant must properly store tools, ladders, hardware, and equipment.

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.”

ESRB Inspectors identified several instances of tools, ladders, and used hardware that were not stored properly. The improper storage of items creates safety hazards including tripping hazards in walkways and unsecured items on elevated platforms. If ladders, other large equipment, and hardware are used frequently on elevated platforms, like the HRSG or Steam turbine deck, the Plant must properly secure or store items after use to prevent tripping and falling object hazards. During ESRB’s inspection, the Plant removed the ladder and loose parts shown in Figure 19. The corrected condition is shown in Figure 20



Figure 19: Unsecure ladder and loose parts on an elevated surface.



Figure 20: Ladder and loose parts removed.



Figure 21: Unsecured equipment on an elevated platform.

II. List of Documentation Reviewed

Category	Reference #	CPUC-Documentation Reviewed
Safety	1	Orientation Program for Visitors and Contractor
	2	Emergency Response and Emergency Action Plan including Evacuation Map
	3	Evacuation Drill Report and Critique since Commercial Operation Date (COD)
	4	Hazardous Material Handling Procedures and Hazard Communication Plan
	5	Safety Data Sheet (SDS) for All Hazardous Chemicals
	6	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	7	Occupational Safety and Health Administration (OSHA) Form 300 (Injury Log) and OSHA Form 301 (Incident Report) since COD
	8	List of all Go 167-C Reportable Incidents since 2021 and Investigations ³
	9	Fire Protection System Test Reports and Inspection Records ⁴
	10	Insurance Report / Loss Prevention / Risk Survey (last 5 years)
	11	Lockout / Tagout Procedure (Last 3 Revisions, if Applicable)
	12	Arc Flash Analysis
	13	Confined Space Entry Procedure
	14	Plant Physical Security and Cyber Security Procedures and Records
	15	Job Safety Analysis Program
Employee Training	16	Employee Training Plan
	17	Employee Safety and Skill related Training Records ¹
	18	Certifications for Electrical, Welders, Forklift & Crane Operators
Contractors	19	Latest list of Qualified Contractors
	20	Contractor Selection / Qualification Procedure
	21	Contractor Monitoring Program
Regulatory	22	Daily Continuous Emissions Monitoring System (CEMS) calibration records ¹
	23	Air Permit
	24	Water Permit

	25	Spill Prevention Control Plan (SPCC)
	26	CalARP Risk Management Plan (RMP)
O&M	27	Daily Round Sheets / Checklists ¹
	28	GO 167-C Logbook ^{1, 2}
	29	List of Open/Backlogged Work Orders or Notifications ¹
	30	List of Closed/Retired Work Orders or Notifications (Last 3 Years) ¹
	31	Work Order Management Procedure (last 3 revisions, if applicable)
	32	Computerized Maintenance Management System (Demonstration Onsite) ²
	33	Supervisory Control and Data Acquisition (SCADA) System (Demonstration Onsite) ²
	34	All Root Cause Analyses
	35	Water Chemistry Manual
	36	Feedwater Grab-sample Test Records (Onsite) ²
	37	Annual Maintenance Plan for 2024-2026
	38	Unit Operating Statistics (Total starts, Fired starts, Aborted/Failed starts, Emergency stops, Total Fired Hours, Peak Fired Hours, Equivalent Starts, Factored Fired Hours, etc.) ¹
Gas Turbine	39	Maintenance & Inspection Procedures and Records for Gas Turbine ¹
	40	Borescope Inspection Reports (last 2 years) ¹
	41	Hot Gas Path Inspection Reports ¹
	42	Combustion Inspection Reports ¹
	43	Most recent Major Report
	44	Overspeed Trip Test Records ¹
	45	Bearing Lube Oil Analysis Reports ¹
	46	Direct Current (DC) Lube Oil Pump Test Records ¹
Air Compressors and Dryers	47	Inspection Procedures and Records ¹
Heat Recovery Steam Generator	48	Tube Analysis Report ¹
	49	Tube Clean Records ¹
	50	Safety Valve Test Records ¹
	51	Hot Spots / Infrared (IR) Inspection Reports ¹
	52	Heat Recovery Steam Generator (HRSG) Inspection Assessment ¹
	53	Steam Drum Inspection Report ¹

High Energy Piping	54	Flow-Accelerated Corrosion (FAC) Inspection or Testing Results & Measurements
	55	Critical and High Energy Piping Safety Program
	56	Pipe Hangers / Support Calibration Records ¹
Steam Turbine	57	Major Inspection Reports ¹
	58	Borescope Inspection Records, if applicable ¹
	59	Overspeed Trip Test Records ¹
	60	Bearing Lube Oil Analysis Reports ¹
	61	DC Lube Oil Pump Test Records ¹
	62	Stop/Control Valve Inspection and Test Records ¹
	63	Steam Turbine Water Induction Prevention Procedures
Generators	64	Stator Winding Inspection Records ¹
	65	Rotor Inspection Records ¹
	66	Generator Bearing Inspections and Lube Oil Analysis ¹
	67	Brush Rigging & Collector Rings Inspections ¹
	68	Other Maintenance & Inspection Procedures (Air Filters, Hydrogen Coolers, Grounding etc.)
Air Cooled Condenser	69	Motor and Gearbox Inspection Records ¹
	70	Air Cooled Condenser Inspection Reports ¹
	71	Corrosion Assessment ¹
	72	Condensate Pump Inspection and Maintenance Records ¹
Substation	73	Hot Spots / IR Inspection Reports ¹
	74	Oil Analysis Records (Past 3 years) ¹ – Spreadsheet with All Results and Recommendations is Acceptable if Available
	75	Emergency Generator Test and Maintenance Records (last 5 years)
	76	Substation Battery and Charger Inspection and Maintenance Records (last 3 years) ¹
Cathodic Protection	77	Cathodic Protection Test Reports ¹
Emission Control System	78	Continuous Emissions Monitoring System Report ¹
	79	Transmitter and Analyzer Test Reports ¹
Calibration	80	Instrument Calibration Procedures and Records ¹
	81	Test Equipment and Calibrated Tooling Calibration Procedures and Records ¹

Documentation	82	Spare Parts Inventory List* ¹
	83	Piping and Instrumentation Diagrams (P&ID) ¹
	84	As-Built Construction Drawings Including Single Line Diagram
	85	Vendor Manuals (Turbines, generators, Air Compressors) ²
	86	Organizational Chart
	87	Internal Audit Procedures and Records

¹ Provide data in a computer searchable file format such as PDF, Word Document, Excel Spreadsheet, etc.

² These items may be provided on-site by the first day of the audit.

³ Reportable Incidents that meet GO 167-C Section 9.4 which occurred within the last 5 years.

⁴ **Fire Protection Systems Test Reports and Inspection Records** include:

A. Inspection, Testing, and Maintenance (ITM) records for the Plant's water-based fire protection systems (e.g., deluge, wet pipe, pre-action sprinkler systems, private hydrants) as per NFPA 25 as amended by the State of California:

- Annual Reports for the last 3 years.
- Quarterly Reports for the last 2 quarters.
- 5 Year Report from the most recent ITM.

B. ITM records for the Plant's engineered and pre-engineered fixed extinguishing systems (e.g., CO2, Clean Agent, etc.), including:

- Semi-Annual Reports for the last 3 years.

C. ITM records for the Plant's fire alarm system as per NFPA 72 as amended by the State of California:

- Annual Reports for the last 3 years.

D. Annual flow testing records for the Plant's fire pumps (electric and/or diesel) as per NFPA 25 as amended by the State of California: Annual Reports from last 3 years.