PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 24, 2025

Rick Arnold
Site Manager
North Sky River Energy, LLC

**SUBJECT: General Order (GO) 167-C Audit of North Sky River,**
**Audit Number GA2025-13NS**

Dear Mr. Arnold:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Evan Coughran and Emmanuel Salas of ESRB staff conducted a generation audit of North Sky River from October 27 through October 30, 2025.

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 January 29, 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. Please note that although North Sky River 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 North Sky River 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 by January 29, 2026.

Please note that ESRB will also post the North Sky River 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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505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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 or (213) 819-6803.

Sincerely,

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
Banu Acimis, Program and Project Supervisor, ESRB, SED, CPUC
Evan Coughran, Utilities Engineer, ESRB, SED, CPUC
Emmanuel Salas, Utilities Engineer, ESRB, SED, CPUC

# CPUC AUDIT FINDINGS OF
# NORTH SKY RIVER
# OCTOBER 27 – OCTOBER 30, 2025

## I. Findings Requiring Corrective Actions.

**Finding 1: North Sky River (NSR)'s work order management system contains outdated, duplicate, and inaccurately open work orders.**

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

Electric Safety and Reliability Branch (ESRB) inspectors examined NSR's work order management system for non-High Voltage (HV) tasks and found numerous discrepancies between the work orders and actual field conditions. Inspectors noted multiple instances where work orders remained open despite the work having been completed, as well as duplicate work orders that mirrored work that had already been performed. These issues indicate that work orders are not being consistently updated, reviewed, or closed out in a timely manner.

The presence of outdated, duplicate, or inaccurately open work orders undermines the effectiveness of the work order management system as a tool for planning, tracking, and prioritizing maintenance activities. An accurate and up-to-date work order system is necessary to ensure that deficiencies are properly tracked and that the backlog is effectively managed. NSR must conduct a comprehensive review and cleanup of its work order management system to ensure that all open work orders accurately reflect plant conditions. NSR must close out all completed or obsolete work orders, correct duplicate entries, and ensure that all remaining work orders are active, valid, and properly documented. NSR must provide ESRB with a plan describing how it will review and address backlogged work orders and submit confirmation once the backlog review has been completed and the work order system accurately reflects current facility maintenance status.

**Finding 2: Hazardous waste collection area contained unmarked empty oil drums.**

**GO 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 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."*

ESRB inspectors observed that the hazardous waste collection area behind the main operations building contained several empty oil drums that were not clearly marked as empty. Proper labeling is essential to maintain compliance and ensure that any material is handled with the care it needs for safety. Drums and storage containers must be clearly marked to ensure any approaching personnel can clearly identify if the drum is empty or not. It is also essential that any approaching personnel can identify the materials enclosed in full drums and can understand the risks associated with it.

NSR personnel labeled the drums during the audit, remedying this finding while ESRB inspectors were on site. Although NSR personnel labeled the drums during the audit, the lack of initial labeling could result in improper storage practices, confusion regarding container status, or mismanagement of hazardous waste materials. NSR must ensure that all containers in the hazardous waste collection area, including empty oil drums, are clearly labeled to indicate their contents or confirm that they are empty. NSR must also implement a process to routinely verify stored barrels are properly labeled.

Figure 1: Hazardous waste collection area with improperly marked empty drums.

Figure 2: Improperly marked empty drums.

**Finding 3: Flammable materials storage cabinet outside the operations building did not fully latch with the self-closing mechanism.**

**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…"*

**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."*

**National Fire Protection Association (NFPA) 1, Section 60.1.2.23(d)** states:

> *"Doors shall be well fitted, self-closing, and equipped with a self-latching device."*

During the audit, ESRB inspectors observed that the flammable materials storage cabinet located outside the operations building did not fully latch when the self-closing mechanism was engaged. A cabinet that does not properly latch fails to meet NFPA requirements and may not provide the intended level of fire protection. After ESRB inspectors identified the issue, NSR personnel corrected the deficiency while inspectors were on site, and the cabinet was observed to fully latch upon reinspection.

NSR must ensure that the cabinet's self-closing and self-latching mechanism remain functional. NSR must also implement routine inspections of all flammable materials storage cabinets to ensure continued compliance with NFPA 1 Section 60.1.2.23(d). NSR must submit documentation describing the method that will be used to perform and document these inspections to ESRB for review and verification.

Figure 3: Flammable storage cabinet not latching.

**Finding 4: Evidence of an active oil leak on the Generator Step Up (GSU) transformer requires proper tracking and corrective action.**

**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 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."*

During the site inspection, ESRB inspectors observed signs of an oil leak on the GSU

transformer located at the NSR substation. NSR staff did not provide documentation indicating that the leak had been previously identified, tracked in the work order management system, or evaluated for corrective action. Oil leaks on HV equipment must be promptly investigated and tracked, as they can indicate issues that may affect transformer reliability.
NSR must properly track this GSU oil leak by creating a work order that documents the condition, the investigation performed, and any corrective actions required. NSR must also develop and submit a plan with a timeline describing how and when the leak will be evaluated, repaired, or otherwise addressed. NSR must provide ESRB with the work order and the corrective action plan for review and verification.

Figure 4: Evidence of oil leak on the substation GSU transformer.

**Finding 5: Multiple turbine interior lights are not operational.**

**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 audit, ESRB inspectors observed that multiple NSR wind turbines had non-operational interior lighting in the lower portion of several towers. Proper interior lighting is essential for safe access, egress, and performance of maintenance activities within turbine towers. NSR must inspect all turbines for lighting deficiencies, repair or replace non-operational interior lights, and document the corrective actions taken. NSR must also incorporate turbine lighting inspections into its preventive maintenance program to ensure ongoing compliance with safety and maintenance standards.

Figure 5: Non-operational lighting on turbines 1-0056 & 1-0064.

**Finding 6: Pad-mount transformer temperature strip deficiencies have not been tracked and assigned work orders.**

**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 examined NSR's temperature task forms for the pad-mount transformers for inspection years 2022, 2023, and 2024. ESRB inspectors noted repeated comments such as "no temp strips installed" on several pad-mount transformers, as well as comments noting "incorrect placement" of temperature strips on others. These same deficiencies appeared in each subsequent year's inspection forms without any indication that the issues had been corrected. When ESRB inspectors asked NSR's HV team about the status of these items, staff were unable to provide work orders, corrective action records, or any documentation showing which deficiencies had been addressed and which remained outstanding. NSR has not demonstrated that these recurring issues were tracked, prioritized, or assigned for correction. Without proper work order entry and follow-through, repeated inspection findings may remain unresolved, resulting in continued equipment monitoring gaps.

NSR must ensure that all inspection comments noted during pad-mount transformer temperature checks are properly documented, tracked, and assigned work orders to ensure timely corrective actions. NSR must provide ESRB with the associated work orders addressing all temperature strip deficiencies identified in the 2022, 2023, and 2024 temperature task forms and must ensure that work orders are properly closed out once corrective actions have been completed.

| Temperature Task Form | | | |
|---|---|---|---|
| Page Number | Year | | |
| | 2022 | 2023 | 2024 |
| Page 1 | Comments: JB 11, 12, 13 and 14 need temp strips installed | Comments: JB 11, 12, 13 and 14 need temp strips installed | Comments: JB 11, 12, 13 and 14 need temp strips installed |
| Page 2 | Comments: JB 21 No temp strips | Comments: JB 21 No temp strips | Comments: JB 21 No temp strips |
| Page 3 | Comments: JB 38, 37,36,35,34,33,32, and 31- no temp strips installed. T61, T60,T63,T62,T53,T54, and T55 incorrect Placement | Comments: JB 38, 37,36,35,34,33,32, and 31- no temp strips installed. T61, T60,T63,T62,T53,T54, and T55 incorrect Placement | Comments: JB 38, 37,36,35,34,33,32, and 31- no temp strips installed. T61, T60,T63,T62,T53,T54, and T55 incorrect Placement |

| | | | |
|---|---|---|---|
| Page 4 | Comments: T-20, T-21, T-22,T-23,T-24,T-50, T-51, and T-52: Incorrect placement. JB-41, JB-42, and JB-43: No temp strips. | Comments: T-20, T-21, T-22,T-23,T-24,T-50, T-51, and T-52: Incorrect placement. JB-41, JB-42, and JB-43: No temp strips. | Comments: T-20, T-21, T-22,T-23,T-24,T-50, T-51, and T-52: Incorrect placement. JB-41, JB-42, and JB-43: No temp strips. |
| Page 5 | T-2, T-3, T-5, T-6, T-9, T-10, T-12, and T-26: Incorrect placement on B phase. JB-51, JB-52, JB-53, and JB-54: No temp strips. | T-2, T-3, T-5, T-6, T-9, T-10, T-12, and T-26: Incorrect placement on B phase. JB-51, JB-52, JB-53, and JB-54: No temp strips. | T-2, T-3, T-5, T-6, T-9, T-10, T-12, and T-26: Incorrect placement on B phase. JB-51, JB-52, JB-53, and JB-54: No temp strips. |
| Page 6 | T-14, T-17, T-18, T-32, T-38, and T-40: Incorrect placement on "B" side bushings. JB-61, JB-62, and JB-63: No temp strips. | T-14, T-17, T-18, T-32, T-38, and T-40: Incorrect placement on "B" side bushings. JB-61, JB-62, and JB-63: No temp strips. | T-14, T-17, T-18, T-32, T-38, and T-40: Incorrect placement on "B" side bushings. JB-61, JB-62, and JB-63: No temp strips. |
| Page 7 | T-48: "B" side bushings placement. JB-72: No temp strips | T-48: "B" side bushings placement. JB-72: No temp strips | T-48: "B" side bushings placement. JB-72: No temp strips |

Figure 6: Temperature task form inspection comments for 2022, 2023, and 2024.

**Finding 7: Arc flash labels on pad mount transformers are sun faded and damaged.**

**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."*

ESRB inspectors observed that multiple NSR turbine pad mount transformers had arc flash labels that were sun faded and unreadable. Clear and legible arc flash labels are essential for hazard communication and for ensuring personnel can accurately assess electrical hazards prior to performing work. Faded or damaged labels reduce the visibility of critical safety information

and increase the potential for unsafe conditions.

NSR began replacing the damaged labels during the audit with appropriate, durable arc-flash stickers. NSR must complete the replacement of all degraded labels, ensure that all pad mount transformers have fully legible and compliant arc flash labeling, and incorporate periodic verification of label condition into its preventive maintenance program.

Figure 7: Sun faded and damaged arc flash label on pad mounted transformer 1-0064.

Figure 8: Sun faded and damaged arc flash label on pad mounted transformer 1-0056.

**Finding 8: NFPA 704 hazard identification placards are not posted at site entry points.**

**GO 167-C, Appendix C, MS 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 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 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"*

ESRB inspectors observed that NFPA 704 hazard placards were not posted at the main NSR site entrance, the auxiliary second entrance gate, and at the gate leading to the Operations and Maintenance (O&M) building. NFPA 704 hazard placards must be visible when visitors and first responders enter the site so that the dangers present are known before they are approached. NSR must install compliant NFPA 704 placards at the sites entrance, the auxiliary second entrance gate, and at the gate leading to the O&M building.

Figure 9: Main entrance gate into the site.

Figure 10: Auxiliary entrance into the site.

**Finding 9: Air permits are not posted in accordance with Eastern Kern Air Pollution Control District (EKAPCD) requirements.**

**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."*

**EKAPCD Permit to Operate No. 0162001-004** states in part:

*"Please be aware, a person who has been granted a Permit to Operate pursuant to District Rule 201 is required by Subsection III of this rnle to firmly affix such pennit, an approved facsimile, or other approved identification bearing the permit number upon the article, machine, equipment or other contrivance covered by the pennit, in such a manner as to be clearly visible and accessible. In the event the equipment is so constrncted or operated that the Pennit to Operate cannot be so placed, the pennit shall be mounted so as to be clearly visible in an accessible place within 25 feet of the equipment."*

During the audit, ESRB inspectors reviewed the EKAPCD Permits to Operate for NSR facility's permitted air-emitting equipment, including backup generators and the aboveground refueling tank. Inspectors observed that the backup generator at the substation did not have the applicable air permit posted within 25 feet of the equipment, as required by EKAPCD Permit to Operate.

NSR must ensure that the EKAPCD Permit to Operate for the substation backup generator is posted at the generator or in a clearly visible and accessible location within 25 feet of the equipment. NSR must submit photographic evidence demonstrating proper posting of the air permit to ESRB for review and verification.

**Finding 10: California Environmental Reporting System (CERS) Consolidated Emergency Response/Contingency Plan contains inaccurate contact 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, ESRB inspectors noted that NSR's CERS Consolidated Emergency Response/Contingency Plan contains inaccurate contact information for the Wind Tech Leader. Emergency response documents must be clear, accurate, current, and provide personnel with the information needed to respond promptly.

NSR must update the CERS Consolidated Emergency Response/Contingency Plan to correct the Wind Tech Leader's contact information and verify all other contacts for accuracy. NSR must submit the revised document with the corrected information to ESRB for review and verification.

**Finding 11: Confined space inventory list is not being maintained as required by NSR procedures.**

**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…"*

NSR's confined space procedure states that the facility will maintain a list of all identified confined spaces, however, no such list was available on site. NSR must compile and maintain a confined space inventory consistent with the requirements outlined in its confined space procedure. This list must be readily available to personnel and incorporated into site safety documentation. NSR must provide ESRB with a copy of the finalized list once it is completed or documentation of any procedural changes indicating that the list is no longer required.

**Finding 12: Site specific fall prevention and protection plans are not developed as required by NSR procedures.**

**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…"*

NSR does not have a site-specific fall prevention and protection plan despite the facility's existing documentation (SMS 215 Fall Prevention & Protection) indicating that such procedures are required. NSR must develop, implement, and maintain a site-specific fall prevention and protection plan as described in NSR procedures SMS 215. NSR must also provide ESRB with a finalized copy once implemented or the changes in NSR procedures that no longer require a site-specific fall prevention and protection plan to be maintained.

## 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 | Confined Space Entry Procedure |
| | 17 | Emergency Shutdown Procedures |
| | 18 | Plant Physical Security and Cyber Security Procedures and Records |
| | 19 | Work at Height Procedure and Climb Certifications |
| | 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 * |
| Contractor | 25 | Latest list of Qualified Contractors* |
| | 26 | Contractor Selection / Qualification Procedure |
| | 27 | Contractor Certification Records |
| | 28 | Contractor Monitoring Program |
| Regulatory | 29 | Air Permit |
| | 30 | Water Permit |
| | 31 | Spill Prevention Control Plan (SPCC) |

| | | |
|---|---|---|
| | 32 | CalARP Risk Management Plan (RMP) |
| 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 | Work Order Management Procedure (last 3 revisions, if applicable) |
| | 38 | Computerized Maintenance Management System (Demonstration onsite)** |
| | 39 | SCADA system (Demonstration onsite)** |
| | 40 | All Root Cause Analyses (if any) |
| | 41 | Standard Operating Procedures |
| | 42 | Substation Battery Test and Maintenance Records (last 5 years) |
| | 43 | Emergency Generator Test and Maintenance Records (last 5 years) |
| | 44 | Vibration Analysis Reports |
| | 45 | Hot Spots / IR Thermal Inspection Reports |
| | 46 | Substation inspection records |
| | 47 | Transformer Oil and Turbine Bearing Oil Analysis Reports |
| | 48 | Maintenance & Inspection Procedures for wind turbines |
| | 49 | Maintenance & Inspection Procedures for generators |
| | 50 | Maintenance & Inspection Procedures for transformers |
| | 51 | Maintenance & Inspection Procedures for gearboxes |
| | 52 | Maintenance & Inspection Procedures for other equipment |
| | 53 | Maintenance & Inspection Records for wind turbines |
| | 54 | Maintenance & Inspection Records for generators |
| | 55 | Maintenance & Inspection Records for transformers |
| | 56 | Maintenance & Inspection Records for gearboxes |
| | 57 | Maintenance & Inspection Records for Switchgear/breaker/relays |
| | 58 | Maintenance & Inspection Records for other equipment |
| Transformers | 59 | Maintenance and Inspection Records for Main Transformer(s) |
| | 60 | Dissolved Gas Analysis Reports |
| Instrumentation | 61 | Instrument Calibration Procedures and Records |
| | 62 | Fire, Heat, Gas, Smoke, and Arc Flash Detection Calibration and Test Records |
| Test Equipment | 63 | Calibration Procedures and Records |
| Documentation | 64 | Electrical Single-Line Diagrams |
| | 65 | Turbine design data |
| | 66 | Vendor Manuals |
| Spare Parts | 67 | Spare Parts Inventory List |
| | 68 | Shelf-life Assessment Report |
| Management | 69 | Employee Performance Review Procedures and Verifications |
| | 70 | Organizational Chart |

| | | |
|---|---|---|
| Internal Audit | 71 | 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.