CPUC AUDIT FINDINGS OF
VALLEY CENTER
BATTERY ENERGY STORAGE
MARCH 9 – MARCH 11, 2026
RESPONSE

Finding 1: Job Safety Analysis (JSA) forms are not being completed accurately.

Valley Center enhanced its review practices to ensure JSAs accurately reflect the scope of work performed. Example, if LOTO is not being performed, the box is not to be checked ahead of time. All PV&BESS Employees and Contractors have been informed of said practice.
Findings closed on 4/2/26.

Finding 2: Emergency and evacuation drill documentation lacks required detail.

Valley Center revised internal review practices to ensure evacuation drill and EAP documentation is accurately completed and maintained. Form has been updated as such. Findings closed on 3/25/26.

Finding 3: Annual Spill Prevention, Control, and Countermeasure (SPCC) inspections are not being performed or documented.

Section 1.5.5 was updated to provide clarification on the inspection frequency. Inspections have been and will continue to be conducted monthly as part of the facility's regular inspection schedule in accordance with 40 CFR §112.8(c)(6).

The original intent and understanding when drafting the SPCC Plan, indicated that the monthly inspection frequency was sufficient and satisfactory to 40 CFR §112.8(c)(6). This notion is reinforced by Section 4.1.1 "Monthly Inspection". Aside from Section 1.5.5, the Plan does not specify an annual inspection nor provide an Annual Inspection form.
Findings closed on 5/27/26.

Finding 4: Infrared (IR) inspection activities are not consistently performed or documented, and IR scan results lack supporting analysis and tracking.

Work orders have been implemented to formalize regularly scheduled inspections and ensure comprehensive documentation, enabling improved consistency in analysis and performance tracking. The associated reports are attached for your review. Findings closed on 3/31/26

Finding 5: Transformer (GSU & Aux) monthly inspection records are incomplete and not consistently maintained.

Work orders have been established to support regularly scheduled inspections. The corresponding reports have been attached for your review. Findings closed on 3/31/26

Finding 6: SPCC Plan contains incorrect oil storage capacity information for intermediate transformers.

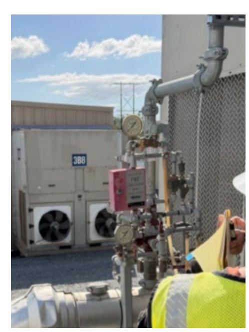
Valley Center has revised the SPCC to reflect the transformer capacity in table 2 to correct the discrepancy. Findings closed on 5/27/26.

Finding 7: Multiple Thermal Runaway Mitigation (TRM) system gauges were not functioning properly.

Coordinated with 3S to install replacement gauges and correct the identified issue.
Findings closed during audit 3/10/26.





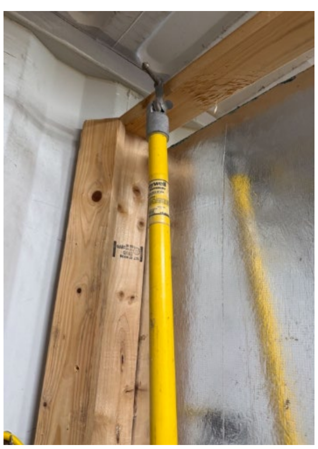


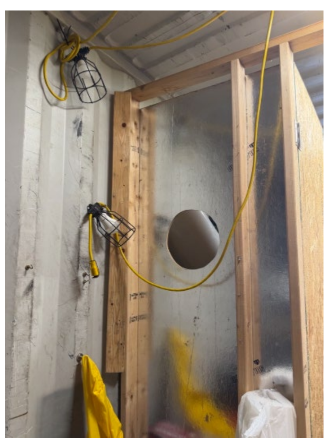
<u>Finding 8: A Flammable Storage Cabinet Does Not Auto Close.</u>

Self-closing device installed. Include photo in submittal. Findings closed on 4/7/26.

<u>Finding 9: Expired hot stick identified in Valley Center storage shipping container.</u>

Valley Center improved tracking of tools and site equipment. Expired or unused items were removed from site. Findings closed during audit 3/9/26.





Finding 10: Two Post Indicator Valves (PIV) at the site were not locked and one of them positioned between open/shut.

Fire Dept added missing locks. Findings closed during audit 3/10/26

(Outside of 1B8)

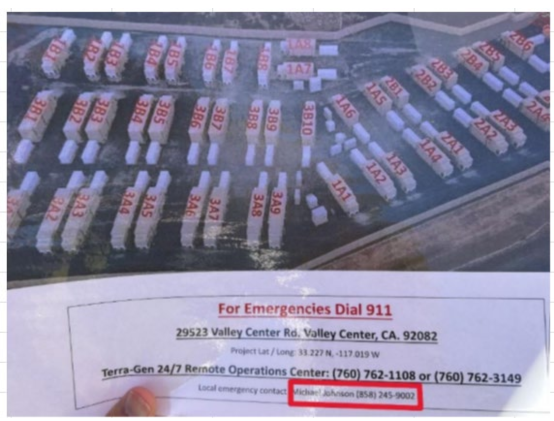
2B8 in front of site (FD tightened fully & deemed good)

Finding 11: The Valley Center Orientation and Emergency Action Plan (EAP) site maps are not properly reflecting all site fire extinguisher locations.

Valley Center Orientation and Emergency Action Plan (EAP) site maps have been updated to reflect proper extinguisher locations. Findings closed on 3/13/26

Finding 12: The facility maps located in the Fire Alarm Control Panel (FACP) and Substation control house contain outdated local emergency contact information.

Site maps reviewed and updated during the audit. Findings closed during audit 3/10/26



Finding 13: The FACP Safety Data Sheet (SDS) QR code directs users to an invalid SDS online inventory.

Pearce QR Code has been removed Findings closed during audit 3/10/26

Finding 14: Intermediate Bulk Container (IBC) tote on site found not properly labeled indicating contents or empty status.

Valley Center personnel added a label identifying the contents as non-potable water prior to the conclusion of the audit. All additional containers/totes have been properly labeled.
Findings closed during audit 3/10/26

Finding 15: Emergency Action Plan (EAP) revision control is not consistent with documented updates.

EAP has been updated to include Administrative ER contacts and Rev 6.
Findings closed on 4/22/26