

**CPUC AUDIT FINDINGS OF  
PANOCHE ENERGY CENTER  
July 25 – 28, 2022**

**I. Findings**

**Finding 1: Main fire water valves are not secured by physical means or an electronic tamper alarm.**

**General Order (GO) 167-B, Appendix E, Operation Standard (OS) 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

**GO 167-B, OS Guidelines, OS 28: Equipment and Systems** states in part:

*“GAO complies with these Operation Standards (1-27) considering the design bases (as defined in the Appendix) of plant equipment and critical systems. The GAO considers the design basis of power plant equipment when as required by other standards it, among other things:*

*Z. Fire Protection System*

*f. Fire Protection Equipment Markings*

- 1. Locations employing low-pressure and high-pressure water systems clearly differentiate each system.*
- 2. Fire protection equipment, including but not limited to fire blanket boxes, pumps, hose locations, hydrants, sirens, and extinguishers, are painted red.*

**National Fire Protection Agency (NFPA) 25 13.3.1.3, 2020 Edition**, states:

*“Each normally open valve shall be secured by means of a seal or a lock or shall be electronically supervised in accordance with the applicable NFPA standard.”*

The two normally open valves that supply fire water to the fire water pumps are not physically locked open or do not have an electronic tamper switch. Locking normally open fire water valves prevents the accidental closure or tampering of the valves and ensures the availability of fire water during emergency situations when the water is needed. The Plant shall install physical means to lock these valves open and shall paint the valve handles red.



**Figure 1:** Fire water valves are not physically locked open.

**Finding 2: High-pressure cylinders require a second form of securement.**

**GO 167-B, Appendix E, OS 1: Safety** states in part:

*“The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company 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.”*

**GO 167-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

ESRB identified high-pressure cylinders at various locations that lacked an additional restraint on the bottom one-third section of the cylinder. Providing high-pressure gas cylinders with two forms of securement is industry best practice to prevent the cylinder from tipping-over and possibly slipping out of its securement.

The Plant must install a second restraint for the high-pressure cylinders at the following locations:

1. The two nitrogen cylinders in the gas yard at the gas chromatograph require a second restraint on the bottom third of the cylinder.



**Figure 2:** Cylinders in the gas yard are not equipped with two forms of securement.

2. The nitrogen cylinder on the spare generator step-up transformer requires a second restraint on the bottom third of the cylinder.



Figure 3: The cylinder on the spare transformer is not equipped with two forms of securement.

3. The spare CO2 bottles in the storage area require a second restraint on the bottom third of the cylinders.



Figure 4: Cylinders in the storage area are not equipped with two forms of securement.



**Finding 3: Standing water in the Enhanced Wastewater System building is causing corrosion and slip hazards.**

**GO 167-B, Appendix E, OS 11: Operations Facilities, Tools, and Equipment** states:  
*“Facilities and equipment are adequate to effectively support operations activities.”*

**GO 167-B, Appendix D, Maintenance Standard (MS) 13: Equipment Performance and Material Condition** states:

*“Equipment performance and materiel condition support reliable plant operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems and degradation.”*

The Enhanced Wastewater System at the Plant has standing water gathering in the corner of the building. The standing water is causing rust and corrosion on metal racks and structural members, which can lead to weakening of the material and metal equipment being used for the Plant’s operation. The water also intrudes on walkways, which introduces slip hazards. The Plant shall mitigate the source of this water or install additional drains or diversions to keep water away from walkways and critical equipment.



**Figure 5:** Standing water accumulating in the Enhanced Wastewater System building.

**Finding 4: The Plant is not keeping pace with replacement of deteriorating signs.**

**GO 167-B, Appendix E, OS 1: Safety** states in part:

*“The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site.”*

**GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states:

*“The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.”*

**GO 167-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

ESRB observed several deteriorating signs and labels, including “High Voltage”, “Confined Space”, NFPA 704 Diamonds, and Injection Well Labels. These signs help inform employees, contractors, and visitors who may be unfamiliar with the nature of the equipment and their inherent dangers.

The Plant needs to update or replace the following signs:

1. The NFPA diamond on the Annulus Fluid tank at Well 4 is missing the yellow reactivity number. The Plant shall inspect any other Annulus Fluid tanks around the Plant’s wells to verify that their NFPA diamonds are installed correctly.



**Figure 6:** The Annulus fluid NFPA diamond at Injection Well 4 is missing its yellow reactivity number.

2. The equipment label for Injection Well #4 is faded and illegible.



Figure 7: Injection Well #4 equipment label is faded and illegible.

3. The warning signs on the Unit 4 Power Control Module (PCM) transformer are faded.



Figure 8: The PCM transformer near Unit 4 has faded warning signs.



4. The High Voltage signs on the Unit 3 neutral grounding cabinet are faded and damaged.



Figure 9: The neutral ground cabinet near the Unit 3 generator has faded and damaged High Voltage Signs

5. The confined space entry sign is missing on the manhole between Unit 2 and Unit 3 and faded on the manhole behind the operations and maintenance (O&M) building.

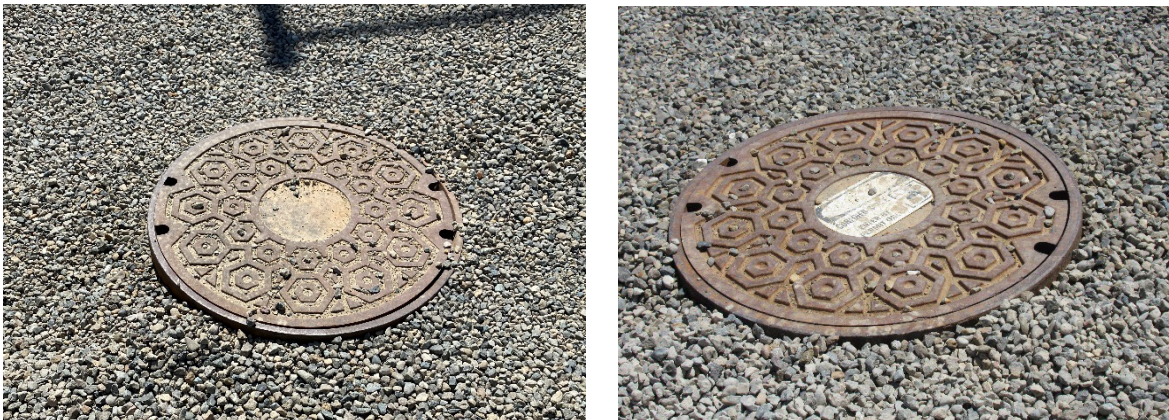


Figure 10: (Left) Missing confined space sign on the manhole between Unit 2 and Unit 3. (Right) Faded confined space sign on the manhole behind the O&M building.

6. The confined space sign on the Unit 3 variable bleed valve (VBV) is not properly secured to its respective confined space entry point.



Figure 11: The VBV at Unit 3 has a detached Confined Space Sign.

7. The NFPA 704 diamond on the blowdown collection tank is damaged.



Figure 12: Damaged NFPA diamond on the blowdown collection tank.



**Finding 5: The backup batteries in the motor control center (MCC) require improved maintenance.**

**GO 167-B, Appendix D, MS 9: Conduct of Maintenance** states:

*“Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation.”*

**GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states:

*“The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.”*

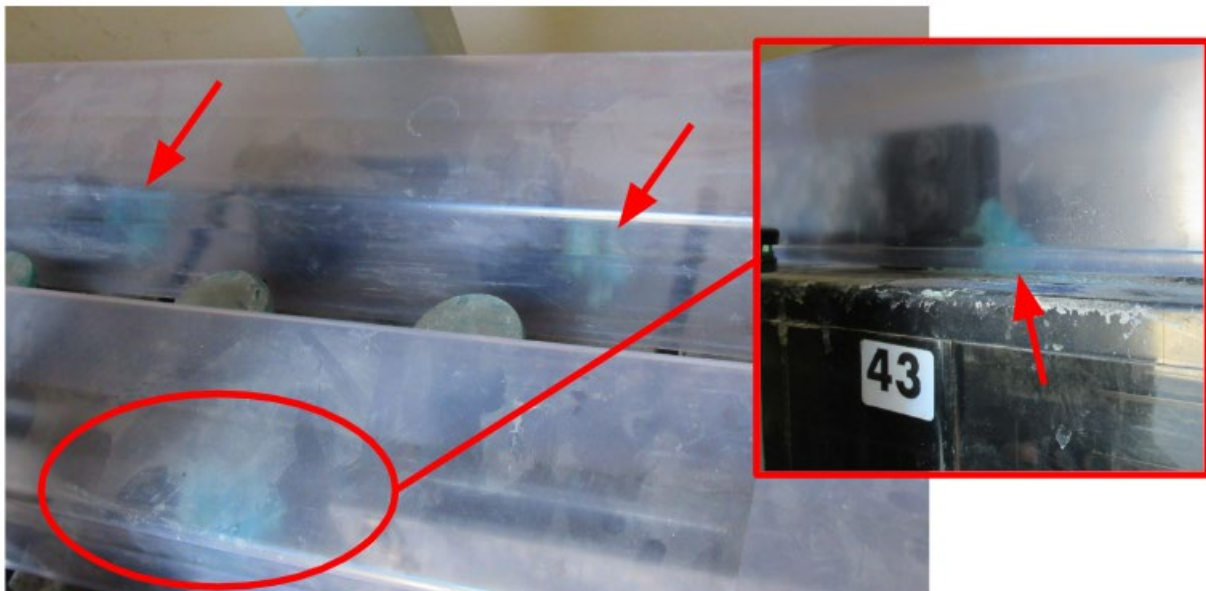
**GO 167-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

ESRB observed corroded terminals on the backup batteries. These batteries are crucial because they supply backup DC power to protective equipment at the MCC if the plant losses AC power. If left unmaintained, the corrosion could degrade batteries’ performance and short-circuit terminal connections. Best practice is to clean up any spilled electrolytic solution after refilling the batteries and to apply a corrosion inhibitor on the terminal contacts to prevent corrosion buildup.

Additionally, ESRB observed fallen battery labels. Proper labeling enables workers to correctly identify specific battery cells for maintenance.

The Plant must perform regular battery inspections and correct all identified deficiencies to prevent further degradation of the battery system.



**Figure 13:** Blue corrosion forming on battery terminals.



Figure 14: Battery equipment labels are falling off.

**Finding 6: A lock nut on the Unit 1 intercooler was loose.**

**GO 167-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

ESRB identified a loose lock nut on the bottom section of the Unit 1 intercooler. Friction locking that utilizes two nuts requires the second outermost nut to be in contact with the bottom jam nut to get the full effect of the mechanical fitting. The outermost nut needs to be tightened down according to its design torque specification. The nut is also rusted. The Plant must tighten the nut and consider replacing it with a new nut.



Figure 15: Lock nut is rusted and loose.

**Finding 7: A ground wire outside the Unit 3 Power Control Module (PCM) was not bonded with the grounding grid.**

**GO 167-B, Appendix D, 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-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

ESRB identified a ground wire outside the Unit 3 PCM that was not bonded to the grounding grid. Grounding and bonding are essential to ensure metallic components are properly grounded in order to protect workers and equipment. The Plant must restore this ground wire to its original design configuration.



**Figure 16:** Unbonded ground wire on the Unit 3 PCM.



**Finding 8: The insulation on the ground wire at the Unit 4 ammonia injection skid is damaged and creates a concern for moisture intrusion.**

**GO 167-B, Appendix D, 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-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

ESRB identified a ground wire at the Unit 4 ammonia injection skid with damaged insulation and exposed conductor. While this is not an imminent safety hazard as ground wires are typically unenergized, the damaged insulation could allow for water intrusion which can further corrode and degrade the conductor, rendering it ineffective. The Plant must repair the damaged insulation.



**Figure 17:** Ground wire with compromised insulation.

**Finding 9: The concrete mastic on the Unit 2 and Unit 3 attemperating air fan structure is spalling.**

**GO 167-B, Appendix D, MS 9: Conduct of Maintenance** states:

*“Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation.”*

**GO 167-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

The concrete mastic around the structural supports at the Units 2 and 3 attemperating air fans is degraded and spalling. The Plant must repair the concrete to prevent further deterioration that may compromise the fan’s operation and structural integrity.



Figure 18: Spalling concrete on the Unit 2 air fan structural support.



Figure 19: Spalling concrete on the Unit 3 air fan structural support.



**Finding 10: Abrupt and unmarked vertical grade changes at storm drains pose fall hazards.**

**GO 167-B, Appendix E, OS 1: Safety** states in part:

*“The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company 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.”*

**GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states:

*“The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.*

Various storm drains around the Plant have sudden vertical drop offs that blend in with its surrounding gravel terrain. ESRB acknowledges that the Plant has existing safety bollards to prevent vehicles from falling into these drop offs at some locations. However, these bollards are intended for vehicles and are installed more than 15 feet away from the drop-offs. Workers traversing the plant by foot may not be aware of the sudden drop offs. The Plant shall install delineator posts closer to all areas subject to high foot traffic to mitigate the potential fall hazards.



**Figure 20:** Example of a sudden vertical grade change near a storm drain at Unit 4. The vertical drop blends in with the terrain if standing from the top area of the drain.



**Finding 11: The insulation on the Unit 3 anti-icing system is coming apart.**

**GO 167-B, Appendix D, MS 9: Conduct of Maintenance** states:

*“Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation.”*

**GO 167-B, Appendix E, OS 8: Plant Status and Configuration** states:

*“Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.”*

The insulation jacket on the elbow of the Unit 3 anti-icing system has loosened, exposing the underside pipe surface. The anti-icing system prevents ice related internal damage to the combustion turbine on days of low temperature and high humidity. Damaged insulation reduces thermal efficiency of this system. The Plant must repair the insulation and include pipe insulation in its routine inspections.



**Figure 21:** Insulation on the anti-icing system is coming apart.

**Finding 12: The east evacuation point in the Risk Management Plan needs to be updated**

**GO 167-B, Appendix E, OS 20: Preparedness for On-Site and Off-Site Emergencies** states in part:

*“The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant.”*

The east evacuation point identified in the Risk Management Plan (RMP) is inconsistent with that provided during the site orientation. The east evacuation point in Figure 1 of the RMP is outside the northeast corner of the facility, while the east evacuation point from the site orientation is on the east side of the facility at a perimeter gate. Although visitors are typically not given the evacuation map from the RMP, having two maps with conflicting information could result in confusion during emergency evacuations if a person happens to have seen both maps. The Plant shall determine a consistent location for its east evacuation area and update any outdated evacuation maps.

**Finding 13: The Plant’s Emergency Response Plan (ERP) contains outdated references**

**GO 167-B, Appendix E, OS 20: Preparedness for On-Site and Off-Site Emergencies** states in part:

*“The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant.”*

Section 9 - Bomb Threats and Acts of Sabotage in the Plant’s ERP still contains references to North American Electric Reliability Corporation (NERC) Standard CIP-001, which is an inactive standard. Having up-to-date references in the ERP allows workers to have access to correct information in the event of an emergency. The Plant shall update the NERC Standard reference in its ERP.

**Finding 14: The Plant does not maintain an itemized list of critical equipment.**

**GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states:

*“The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.”*

An internal audit (Cleanliness and Foreign Material Assessment) conducted on March 30, 2017, recommended the Plant to develop a list of critical equipment. The assessment’s list of corrective actions states the Plant should “develop a list of critical equipment/areas in accordance with NAES MMP-08”. The Plant signed off on the corrective actions on January 10, 2021 but has no written list of critical equipment on file. The Plant needs to

create a list of critical equipment and areas as recommended by its internal audit to facilitate the continuous improvement of the generating facility.

**Finding 15: The spill kit inspection procedure in the Spill Prevention Control and Countermeasure Plan needs to be updated.**

**GO 167-B, Appendix D, MS 8: Maintenance Procedure and Documentation** states:

*“Maintenance procedures and documents are clear and technically accurate, provide appropriate direction, and are used to support safe and reliable plant operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.”*

The Spill Prevention Control and Countermeasure Plan (SPCC) states that the Plant conducts weekly inspection of the spill kits. ESRB determined based on Plant records and statements from Plant staff that the spill kit inspections are conducted monthly instead. Section 5.2 of the SPCC states “The Facility maintains spill response equipment at the site. The spill equipment inventory is checked by Facility staff weekly as part of routine rounds.” However, Appendix III has the Panoche Energy Center Monthly SPCC Inspection Checklist for monthly spill kit inspections. Updated procedures ensure routine inspections and maintenance are performed correctly. The Plant needs to update the SPCC for monthly spill kit inspections instead of weekly to reflect actual practices of the Plant and align with the inspection checklist documentation.

**Panoche Energy Center Monthly SPCC Inspection Checklist**

Spill Kit Inspection location	Spill Kit Item #	Any Evidence of Spill Kit Seal broken from container?	Any Evidence of Spill Kit equipment missing, broken from container?	Any Equipment Wear, Damage, Deterioration?	Any other conditions that should be addressed for continued safe operation or that affect the site SPCC Plan?
Ammonia Storage Tank	KIT341/262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT1 - Auxiliary Compartment	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT1 - Generator Lube Oil	KIT243	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT2 - Auxiliary Compartment	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT2 - Generator Lube Oil	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT3 - Auxiliary Compartment	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT3 - Generator Lube Oil	KIT243	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT4 - Auxiliary Compartment	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
CT4 - Generator Lube Oil	KIT243	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
GC-A,B,C Waste oil Tanks	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
Switchyard MCC - Battery Room	KIT352	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
Fire Pump House	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
Admin - Battery Room	KIT352	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
Warehouse - Oil Storage Area	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
Water Treatment Building - West	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
EWS - East	KIT341	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
EWS - West	KIT262	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	
Notes					

\*NOTE: \* If spill kit seal broke, inventory and replace or order material and replace seal, and document actions.

Figure 22: Spill Kit monthly inspection checklist in SPCC.



**Finding 16: The contractor certification records need to be updated and maintained according to the Plant procedures.**

**GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states:

*“The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.”*

**GO 167-B, Appendix E, OS 5: Operations Personnel Knowledge and Skills** states:

*“Operations personnel are trained and qualified to possess and apply the knowledge and skills needed to perform operations activities that support safe and reliable plant operation.”*

The Contractor Safety Management Procedure (SMP-26) states the Contractor Safety Data Sheets are required to be submitted and reviewed before a contractor is approved for work at the Plant. The contractor approval is valid for one year and contractors must be re-evaluated annually. The Safety Data Sheet for Labor Max was not provided and the Safety Data Sheets for contractor approval shows no signs of being reviewed annually. The Plant must follow its written procedure and review the safety data sheets annually for all contractors who perform work at the Plant to ensure that workers are properly certified and capable of performing their contractual work.

**Finding 17: The list of qualified individuals in the Confined Space Entry Procedure is out-of-date.**

**GO 167-B, Appendix E, OS 1: Safety** states in part:

*“The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site.”*

**GO 167-B, Appendix D, MS 8: Maintenance Procedure and Documentation** states:

*“Maintenance procedures and documents are clear and technically accurate, provide appropriate direction, and are used to support safe and reliable plant operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.”*

The Confined Space Entry Procedure (SMP-07 Confined Space) has an outdated list of qualified individuals. Appendix B in the procedure lists all plant personnel that are authorized for confined space entry. However, the list included personnel who are no longer employed at the site. It is important to have an up-to-date list of qualified personnel for the confined space entry to ensure that only those with the proper training and knowledge enter a confined space. The Plant needs to update its list of qualified personnel for confined space entry in Appendix B and regularly review the list to ensure it is accurate.

**Finding 18: The Grab-and-Go Emergency Kits contain outdated procedures and are incomplete.**

**GO 167-B, Appendix D, MS 8: Maintenance Procedure and Documentation** states:

*“Maintenance procedures and documents are clear and technically accurate, provide appropriate direction, and are used to support safe and reliable plant operation. Procedures must be current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.”*

**GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states:

*“The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.”*

The Injury Response and Reporting information (SMP-14) procedure in the Grab-and-Go Kits in the control room is out-of-date. The procedure in the kit is revision 2, but the Plant currently uses revision 3. The Plant needs to replace the procedure in the Grab-and-Go Kits with the current version.

Additionally, the Ammonia Spill Response Drills conducted in 2019, 2020, and 2021 all recommended adding “a simple set of instruction to the Grab-and-Go Kit listing items to collect and actions to take prior to evacuating”. Despite the recommendation being listed in the Post Drill Critique for all three years, ESRB found no list of actions or supplies to take during an emergency. The Plant needs to add the recommended list of instructions and equipment to the Grab-and-Go Kits.

## II. List of Documents Reviewed

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors
	2	Evacuation Procedure
	3	Evacuation Map and Plant Layout
	4	Evacuation Drill Report & Critique (last 3 years)
	5	Hazmat Handling Procedure
	6	MSDS for All Hazardous Chemicals
	7	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	8	OSHA Form 300 (Injury Log) in last 4 years
	9	OSHA Form 301 (Incident Report) in last 4 years
	10	List of all CPUC Reportable Incidents (last 5 years)
	11	Root Cause Analysis of all Reportable Incidents or Major Equipment Failures (if any)
	12	Fire Protection System Test Reports and Inspection Records (last 3 years)
	13	Insurance Report / Loss Prevention / Risk Survey (last 3 years)
	14	Lockout / Tagout Procedure (last 3 revisions, if applicable)
	15	Arc flash Analysis
	16	Confined Space Entry Procedure
	17	Plant Physical Security Procedures and Records and Cyber Security Procedures
Training	18	Safety Training Records
	19	Skill-related Training Records
	20	Certifications for Welders, Forklift & Crane Operators
	21	Hazmat Training and Records
Contractor	22	Latest list of Qualified Contractors



	23	Contractor Selection / Qualification Procedure
	24	Contractor Certification Records
	25	Contractor Monitoring Program
Regulatory	26	Daily CEMS Calibration Records
	27	Air Permit
	28	Water Permit
	29	Spill Prevention Control Plan (SPCC)
	30	CalARP Risk Management Plan (RMP)
O&M	31	Daily Round Sheets / Checklists
	32	Logbook
	33	List of Open/Backlogged Work Orders
	34	List of Closed/Retired Work Orders (last 4 quarters)
	35	Work Order Management Procedure (last 3 revisions, if applicable)
	36	Computerized Maintenance Management System (Demonstration Onsite)
Gas Turbine	37	Borescope Inspection Reports (last 2 years)
	38	Maintenance & Inspection Procedures (or Related Documents) (last 3 revisions, if applicable)
	39	Intercooler Inspection Reports (if applicable)
	40	Combustors Inspection (CI) Reports
	41	Hot Gas Path (HGI) Inspection Reports
	42	Bearing Lube Oil Analysis Reports
	43	DC Lube Oil Pump Test Records
Main Plant Air Compressor(s)	44	Inspection Procedures and Records
Documents	45	P&IDs
	46	Vendor Manuals
Spare Parts	47	Spare Parts Inventory List

	48	Shelf-life Assessment Report
Management	49	Employee Performance Review Procedures and Verifications
	50	Organizational Chart
Generator	51	Maintenance & Inspection Procedures (or related documents)
	52	Generator Inspection Reports
	53	Bearing Lube Oil Analysis
	54	Polarization Test Records
Transformer	55	Hot Spots / IR Inspection Reports
	56	Oil Analysis Reports
Cathodic Protection	57	Procedures and Inspection Records
Instrumentation	58	Instrument Calibration Procedures and Records
Test Equipment	59	Calibration Procedures and Records
Emission Control Equipment (SCR, Ammonia, NOx, CO)	60	Maintenance & Inspection Procedures and Records
Internal Audit	61	Internal Audit Procedures and all Records