



EDF Renewables North America
15445 Innovation Drive
San Diego, CA 92128
www.edf-re.com

January 12, 2024

Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission (CPUC)
505 Van Ness Avenue
San Francisco, CA 94102-3298
Email: banu.acimis@cpuc.ca.gov

Re: Generation Audit of Pacific Wind Project - Audit Number GA2023-22PW

Dear Banu Acimis:

Reference is made to the letter sent by CPUC dated December 8, 2023 regarding an audit (GA2023-22PW) conducted at the Pacific Wind Power Plant from October 9 through October 12, 2023.

Please find attached the Corrective Actions and Planned Actions report which provides responses and status of each audit finding.

If you have any questions concerning this audit, please don't hesitate to contact Darren Smith and Jesse Sanchez at darren.smith@edf-re.com and jesse.sanchez@edf-re.com, respectively.

Very truly yours,
Darren Smith

A handwritten signature in black ink, appearing to read "Darren Smith", written over a horizontal line.

EDF Renewables Services, Inc.

**CPUC Audit Findings of
Pacific Wind
Oct 9 - Oct 12, 2023
GA2023-22PW**

Corrective Actions and Planned Actions

**by
EDF Renewables Services, Inc.
12-Jan-23**

| Finding | Item | Description | Status | Completion/Target Date |
|---------|------|--|-------------|------------------------|
| 1 | 1.1 | The NFPA 704 diamond on the unleaded gasoline fuel tank is incorrect. According to the Plant's SDS for unleaded gasoline fuel, the blue health diamond should be 2 and the red flammability diamond should be 4. | Closed | 12/22/2023 |
| 2 | 1.2 | The NFPA 704 diamond on the liquid propane gas storage areas are incorrect. According to the Plant's SDS for unleaded gasoline fuel, the blue health diamond should be 2 and the red flammability diamond should be 4. | Closed | 12/22/2023 |
| 2 | 2.1 | An energized electrical cord is lying in a standing pool of water in the fire pump room. The Plant must address deficiencies with the water level indicators on the fire water tanks | Closed | 1/4/2024 |
| 3 | 3.1 | and potable water tanks. | Closed | 12/22/2023 |
| 4 | 4.1 | The Plant is lacking in performing monthly fire extinguisher inspections. | Closed | 1/8/2024 |
| 5 | 5.1 | The Plant does not have a proper ventilation control for the batteries in the substation battery room. | Pending | 1/22/2024 |
| 6 | 6.1 | The Plant must address out-of-service equipment on the Generator Step-Up (GSU) Transformer in the substation. | Pending | 1/22/2024 |
| 6 | 6.2 | The Hydran 201Ti dissolved gas analysis (DGA) monitoring system on the substation's main generator step-up transformer was offline. | Pending | 1/22/2024 |
| 7 | 7.1 | ESRB identified that one of the radiator fans was out of service. The Plant requires improvements to its monthly substation inspection routines. | Closed | 1/8/2024 |
| 8 | 8.1 | The Plant's Emergency Action Plan lacks a CPUC Safety-related Incident Reporting Procedure. | Closed | 12/22/2023 |
| 9 | 9.1 | The Plant requires improvements to its documentation and evaluation of annual evacuation drill trainings. | Closed | 1/2/2024 |
| 10 | 10.1 | The Confined Space section in the Plant's Contractor Orientation presentation require updates. | Closed | 12/22/2023 |
| 11 | 11.1 | The Plant requires improvements to its work order documentation. The Plant needs to address backlogged work orders created from January 2018 through July | Closed | 1/2/2024 |
| 12 | 12.1 | 2023. | Closed | 12/22/2023 |
| 13 | 13.1 | The shortage of parts inventory caused deferred maintenance on wind turbines. The Plant must be more proactive in monitoring and mitigating excess levels of combustible | Closed | 12/22/2023 |
| 14 | 14.1 | dissolved gases in its padmount transformers. | Closed | 12/22/2023 |
| 15 | 15.1 | The Plant does not comply with its procedure for high voltage equipment switching. | In Progress | 1/19/2024 |

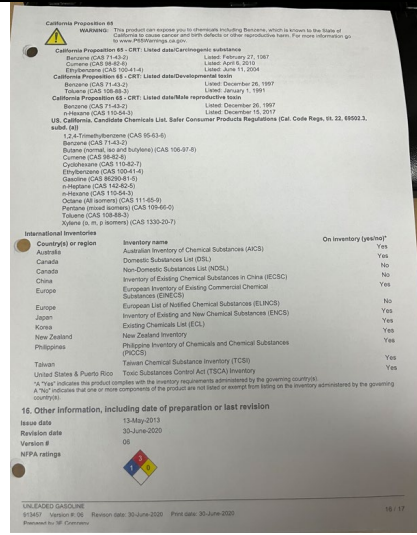
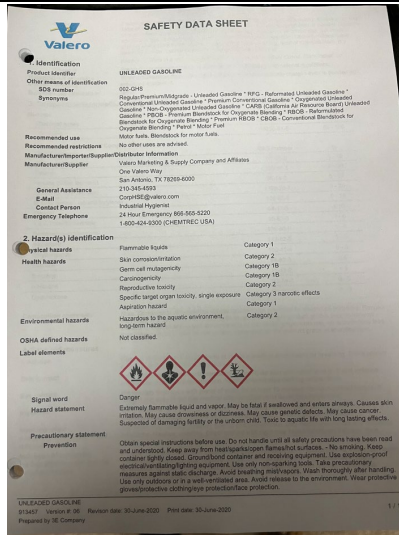
Finding 1: The National Fire Protection Association (NFPA) 704 Diamonds on the unleaded gasoline tank and propane storage tank area do not match the Safety Data Sheets (SDS).

| GO 167 Reference | GO 167 Definition |
|---|--|
| GO 167-B, Appendix D, Maintenance Standard (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-B, Appendix E, Operation Standard (OS) 1: Safety | “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 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.” |
| Persons Responsible | Notes |
| Jesse Sanchez | 1.The NFPA 704 diamond on the unleaded gasoline fuel tank is incorrect. According to the Plant’s SDS for unleaded gasoline fuel, the blue health diamond should be 2 and the red flammability diamond should be 4. |

| Item | Finding Evidence |
|------|--|
| 1.1 | Incorrect NFPA 704 diamond on the unleaded gasoline storage tank. |
| 1.2 | Incorrect NFPA 704 diamonds on the liquid propane gas storage tanks. |

| Item | Proposed Corrective Action by EDF |
|------|---|
| 1.1 | Review SDS to ensure most current version is filed and update diamond, if needed. |
| 1.2 | Review SDS to ensure most current version is filed and update diamond, if needed. |
| Item | Implemented or Planned Corrective Action by EDF |
| 1.1 | Reviewed SDS on file and found a revised copy. Site manager updated all SDS binders in the O&M facility to reflect proper labeling. |
| 1.2 | Reviewed SDS most current copy was already onfile. Site manager updated the diamonds onsite. |

Photographic Evidence Post-Correction



Finding 2: An energized electrical cord is lying in a standing pool of water in the fire pump room.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix D, MS 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 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.” |
| GO 167-B, Appendix E, OS 13: Routine Inspections states in part: | “Routine inspections by plant personnel ensure that all areas and critical parameters of plant 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 plant operations, and to identify the need for maintenance.” |
| Persons Responsible | Notes |
| Jesse Sanchez | The fire water booster pump’s electrical cord is connected to an extension cord that is lying in a pool of standing water in the fire protection room. Having an energized electrical cord in water may cause a fault and render the pump inoperable during emergency firefighting situations. At worst, the standing pool of water may become energized and cause accidental electrocution. The Plant must immediately remove the electrical cord from the pool of water and identify a solution to safely power the pump. |

| Item | Finding Evidence |
|------|--|
| 2.1 | Energized extension cord plug lying in standing water. |

| Item | Proposed Corrective Action by EDF |
|------|--|
| 2.1 | Install/upgrade 220v outlet to 110v |
| Item | Implemented or Planned Corrective Action by EDF |
| 2.1 | Site manager contracted electrician to upgrade 220v outlet to 110v . Extension cord was eliminated. |

Photographic Evidence Post-Correction



Finding 3: The Plant must address deficiencies with the water level indicators on the fire water tanks and potable water tanks.

| GO 167 Reference | GO 167 Definition |
|---|--|
| GO 167-B, Appendix D, MS 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." |
| Persons Responsible | Notes |
| Jesse Sanchez | (Left) Yellowing fire water level indicator pipe. (Right) Unsecured and yellowed potable water level indicator pipe. |

| Item | Finding Evidence |
|------|--|
| 3.1 | (Left) Yellowing fire water level indicator pipe. (Right) Unsecured and yellowed potable water level indicator pipe. |

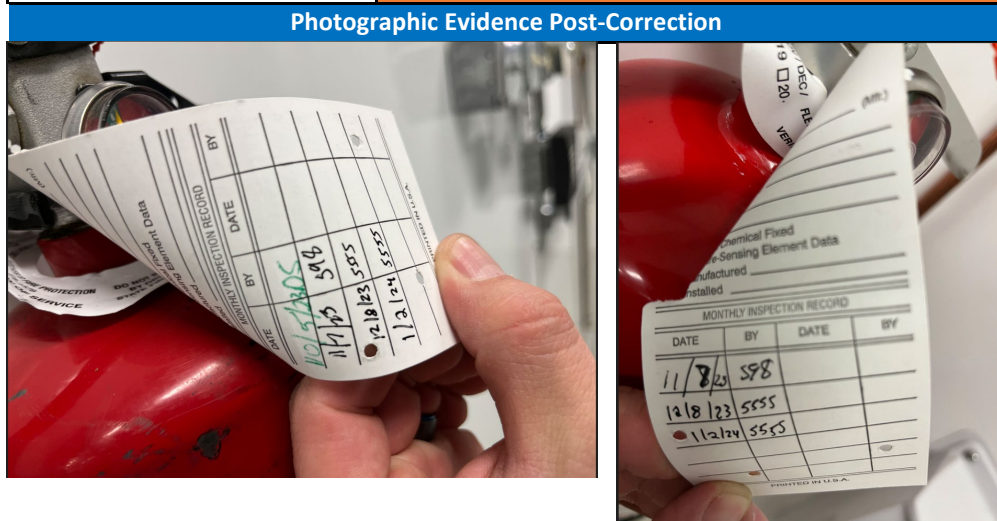
| Item | Proposed Corrective Action by EDF |
|---------------------------------------|---|
| 3.1 | Replace yellowing hose and secure. |
| Item | Implemented or Planned Corrective Action by EDF |
| 3.1 | Site team replaced and secured hose. |
| Photographic Evidence Post-Correction | |



Finding 4: The Plant is lacking in performing monthly fire extinguisher inspections.

| GO 167 Reference | GO 167 Definition |
|---|--|
| GO 167-B, Appendix D, MS 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 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 13: Routine Inspections states in part: | "Routine inspections by plant personnel ensure that all areas and critical parameters of plant operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed." |
| Persons Responsible | Notes |
| Jesse Sanchez | Fire extinguisher in the substation building is missing monthly inspection sign offs. |

| Item | Finding Evidence |
|------|---|
| 4.1 | Fire extinguisher in the substation building is missing monthly inspection sign offs. |
| Item | Proposed Corrective Action by EDF |
| 4.1 | Review finding with team. Perform periodic spot checks to ensure compliance. |
| Item | Implemented or Planned Corrective Action by EDF |
| 4.1 | Manager performed site inspections with the team, and set clear expectations for future inspections. |



Finding 5: The Plant does not have a proper ventilation control for the batteries in the substation battery room.

| GO 167 Reference | GO 167 Definition |
|--|---|
| GO 167-B, Appendix E, OS 1: Safety states: | “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. 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-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” |
| NFPA 1: Fire Code 2018, Chapter 52, Energy Storage Systems, Code 52.3.2.8, Ventilation states: | Where required...ventilation shall be provided for rooms and cabinets in accordance with the mechanical code and one of the following: |
| Persons Responsible | Notes |
| Jesse Sanchez - EDF High Voltage Team | The ventilation system is not equipped with automatic control devices. |

| Item | Finding Evidence |
|---------------------------------------|---|
| 5.1 | The ventilation system is not equipped with automatic control devices. |
| Item | Proposed Corrective Action by EDF |
| 5.1 | Proper ventilation to be installed |
| Item | Implemented or Planned Corrective Action by EDF |
| 5.1 | High voltage team has procured parts. Installation is scheduled for 1/22/2024 during annual substation maintenance. |
| Photographic Evidence Post-Correction | |

No photos available

Finding 6: The Plant must address out-of-service equipment on the Generator Step-Up (GSU) Transformer in the substation.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix D, MS 11: Plant Status and Configuration states: | “Station activities are effectively managed so plant status and configuration are maintained to support reliable and efficient operation.” |
| GO 167-B, Appendix D, MS 13: Equipment Performance and Materiel 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.” |
| Persons Responsible | Notes |
| Jesse Sanchez - High Voltage Team | 1. The continuous DGA analyzer was offline. 2. One GSU fan was not operating during the manual fan test. |

| Item | Finding Evidence |
|------|---|
| 6.1 | The continuous DGA analyzer was offline. |
| 6.2 | One GSU fan was not operating during the manual fan test. |

| Item | Proposed Corrective Action by EDF |
|------|-----------------------------------|
| 6.1 | Repair/replace analyzer |
| 6.2 | Replace GSU fan |

| Item | Implemented or Planned Corrective Action by EDF |
|------|--|
| 6.1 | High voltage team inspection is scheduled for 1/22/2024 during annual substation maintenance |
| 6.2 | High voltage team has procured parts. Installation is scheduled for 1/22/2024 during annual substation maintenance |

Photographic Evidence Post-Correction

No photos available.

Finding 7: The Plant requires improvements to its monthly substation inspection routines.

| GO 167 Reference | GO 167 Definition |
|--|---|
| GO 167-B, Appendix D, MS 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 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 13: Routine Inspection states in part: | "Routine inspections by plant personnel ensure that all areas and critical parameters of plant 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 plant operations, and to identify the need for maintenance. All personnel are trained in the routine inspections procedures relevant to their responsibilities. Among other things, the GAO creates, maintains, and implements routine inspections by: B. Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels." |
| Persons Responsible | Notes |
| Jesse Sanchez | ESRB observed inconsistencies in EDF Renewable's monthly substation inspection records. |

| Item | Finding Evidence |
|---------------------------------------|---|
| 7.1 | ESRB observed inconsistencies in EDF Renewable's monthly substation inspection records. |
| Item | Proposed Corrective Action by EDF |
| 7.1 | Manager will review documentation monthly to ensure proper completion. |
| Item | Implemented or Planned Corrective Action by EDF |
| 7.1 | Manager has reviewed 2 months of inspections(Nov/Dec). No issues were present on either form. |
| Photographic Evidence Post-Correction | |

No Photo

Finding 8: The Plant’s Emergency Action Plan lacks a CPUC Safety-related Incident Reporting Procedure.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix E, OS 2: Organizational Structure and Responsibilities states: | “The organization with responsibility and accountability for establishing and implementing an operation strategy to support company objectives for reliable plant operation is clearly defined, communicated, understood and is effectively implemented. Reporting relationships, control of resources, and individual authorities support and are clearly defined and commensurate with responsibilities.” |
| Persons Responsible | Notes |
| Jesse Sanchez - Michael Brady | The Plant’s Emergency Action Plan lacks a CPUC Safety-related Incident Reporting Procedure. |

| Item | Finding Evidence |
|---------------------------------------|---|
| 8.1 | The Plant’s Emergency Action Plan lacks a CPUC Safety-related Incident Reporting Procedure. |
| Item | Proposed Corrective Action by EDF |
| 8.1 | Site manager and Asset Manager will review and report all future events, as required. |
| Item | Implemented or Planned Corrective Action by EDF |
| 8.1 | All new incidents will be reported as required. |
| Photographic Evidence Post-Correction | |

No Photo

Finding 9: The Plant requires improvements to its documentation and evaluation of annual evacuation drill trainings.

| GO 167 Reference | GO 167 Definition |
|--|---|
| 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 20: Preparedness for On-Site and Off-Site Emergencies states: | “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. Among other things, the GAO: |
| Persons Responsible | Notes |
| Jesse Sanchez | The Plant requires improvements to its documentation and evaluation of annual evacuation drill trainings. |

| Item | Finding Evidence |
|---------------------------------------|--|
| 9.1 | The Plant requires improvements to its documentation and evaluation of annual evacuation drill trainings. |
| Item | Proposed Corrective Action by EDF |
| 9.1 | 2024 evacuation forms will be filled out to include all details |
| Item | Implemented or Planned Corrective Action by EDF |
| 9.1 | Effective immediately for the up coming year's drill. Forms will be completed to capture drill details and comments. |
| Photographic Evidence Post-Correction | |

No photo available

Finding 10: The Confined Space section in the Plant’s Contractor Orientation presentation require updates.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix E, OS 1: Safety states: | “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. 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.” |
| Persons Responsible | Notes |
| Jesse Sanchez | The Confined Space section in the Plant’s Contractor Orientation presentation require updates. |


| Item | Finding Evidence |
|---------------------------------------|--|
| 10.1 | The Confined Space section in the Plant’s Contractor Orientation presentation require updates. |
| Item | Proposed Corrective Action by EDF |
| 10.1 | Manager will update slide deck to include cover specific areas. |
| Item | Implemented or Planned Corrective Action by EDF |
| 10.1 | Site manager updated slide deck(image below). |
| Photographic Evidence Post-Correction | |


Hazard Control – Confined Spaces

Define the Confined Space Type

- EDFR Identifies confined space by the following classifications
 - Non-permit Confined Space
 - Permit-Required Confined Space

| SPACE DESCRIPTION | Non-Permit Confined Space | Permit-Required Confined Space |
|-------------------|---|---|
| | <ul style="list-style-type: none"> Tower Sections Nacelles Tower Sumps and Cellars/Basements Battery Storage Units Hub: No atmospheric hazards (may contain battery systems but is constructed in such a way that off gassing does not rise to harmful levels. Solar: Vaults under transformers | <ul style="list-style-type: none"> Blades Basements: Space beneath the control deck (specific to towers with SF6 Gas switch gear located on the entry deck) Hub: Atmospheric hazards (may contain battery systems and is constructed in such a way that off gassing may be trapped within the hub. |




| 36

Finding 11: The Plant requires improvements to its work order documentation.

| GO 167 Reference | GO 167 Definition |
|--|--|
| GO 167-B, Appendix D, MS 8: Maintenance Procedures 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 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 D, MS 17: Equipment History states: | “Maintenance standards or procedures clearly define requirements for equipment history for the systems and equipment, including, what information or data to collect, how to record data, and how the data is to be used.” |
| GO 167-B, Appendix E, OS 17: Records of Operation states: | “The GAO assures that data, reports and other records reasonably necessary for ensuring proper operation and monitoring of the generating asset are collected by trained personnel and retained for at least five years, and longer if appropriate.” |
| Persons Responsible | Notes |
| Jesse Sanchez | The Plant requires improvements to its work order documentation. |

| Item | Finding Evidence |
|---------------------------------------|---|
| 11.1 | The Plant requires improvements to its work order documentation. |
| Item | Proposed Corrective Action by EDF |
| 11.1 | Manager to provide SAP training to site team. |
| Item | Implemented or Planned Corrective Action by EDF |
| 11.1 | Manager trained site teams how to attach multiple notifications to service orders. This will avoid duplicates/outstanding. Manager also performs thorough inspections/reviews of service inspection forms. |
| Photographic Evidence Post-Correction | |

No photo available

Finding 12: The Plant needs to address backlogged work orders created from January 2018 through July 2023.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix D, MS 10: Work Management states: | “Work is identified and selected based on value to maintaining reliable plant operation. Work is planned, scheduled, coordinated, controlled, and supported with resources for safe, timely, and effective completion.” |
| GO 167-B, Appendix E, OS 16: Participation by Operations Personnel in Work Orders states in part: | “Operations personnel identify potential system and equipment problems and initiate work orders necessary to correct system or equipment problems that may inhibit or prevent plant operations. Operations personnel monitor the progress of work orders affecting operations to ensure timely completion and closeout of the work orders, so that the components and systems are returned to service.” |
| Persons Responsible | Notes |
| Jesse Sanchez | The Plant needs to address backlogged work orders created from January 2018 through July 2023. |

| Item | Finding Evidence |
|---------------------------------------|--|
| 12.1 | The Plant needs to address backlogged work orders created from January 2018 through July 2023. |
| Item | Proposed Corrective Action by EDF |
| 12.1 | Manager to conduct site wide sweep/cleanup. |
| Item | Implemented or Planned Corrective Action by EDF |
| 12.1 | Manager, in December 2023, conducted site service order clean up. Backlogged service orders have been addressed/new service order to capture a new date. |
| Photographic Evidence Post-Correction | |

No photo available

Finding 13: The shortage of parts inventory caused deferred maintenance on wind turbines.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix D, MS 3: Maintenance Management and Leadership states: | “Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities.” |
| GO 167-B, Appendix D, MS 10: Work Management states: | “Work is identified and selected based on value to maintaining reliable plant operation. Work is planned, scheduled, coordinated, controlled, and supported with resources for safe, timely, and effective completion.” |
| GO 167-B, Appendix D, MS 12: Spare Parts, Material and Services states: | “Correct parts and materials in good condition, are available for maintenance activities to support both forced and planned outages. Procurement of services and materials for outages are performed in time to ensure materials will be available without impact to the schedule. Storage of parts and materials support maintaining quality and shelf life of parts and materials.” |
| 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.” |
| Persons Responsible | Notes |
| Jesse Sanchez | The shortage of parts inventory caused deferred maintenance on wind turbines. |

| Item | Finding Evidence |
|---------------------------------------|--|
| 13.1 | The shortage of parts inventory caused deferred maintenance on wind turbines. |
| Item | Proposed Corrective Action by EDF |
| 13.1 | Manager to review inventory and place orders 6 months ahead. |
| Item | Implemented or Planned Corrective Action by EDF |
| 13.1 | Manager and Business Coordinator submitted parts request for 2024, in December 2023. Previous issues with hydraulic filters were due to COVID logistics / supply chain delays. |
| Photographic Evidence Post-Correction | |

No photo available

Finding 14: The Plant must be more proactive in monitoring and mitigating excess levels of combustible dissolved gases in its padmount transformers.

| GO 167 Reference | GO 167 Definition |
|---|--|
| 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 D, MS 4: Problem Resolution and Continuing Improvement states: | “The company values and fosters an environment of continuous improvement and timely and effective problem resolution.” |
| GO 167-B, Appendix D, MS 7: Balance of Maintenance Approach states in part: | “The maintenance program includes the proper balance of the various approaches to maintenance, e.g., preventive, predictive, or corrective. The approach is adequately documented with consideration of economics and reliability of equipment or components, and their affect on reliable operation of the unit.” |
| GO 167-B, Appendix D, MS 10: Work Management states in part: | “Work is identified and selected based on value to maintaining reliable plant operation. Work is planned, scheduled, coordinated, controlled, and supported with resources for safe, timely, and effective completion.” |
| Persons Responsible | Notes |
| Jesse Sanchez | The Plant must be more proactive in monitoring and mitigating excess levels of combustible dissolved gases in its padmount transformers. |

| Item | Finding Evidence |
|---------------------------------------|--|
| 14.1 | The Plant must be more proactive in monitoring and mitigating excess levels of combustible dissolved gases in its padmount transformers. |
| Item | Proposed Corrective Action by EDF |
| 14.1 | Manager will contract a subcontractor to degas PMT units. |
| Item | Implemented or Planned Corrective Action by EDF |
| 14.1 | Site contracted Aubrey Silvey to perform degassing. Total of 19 PMTs will be degassed. Completion date is set for 1/19/2024. |
| Photographic Evidence Post-Correction | |

No photo available

Finding 15: The Plant does not comply with its procedure for high voltage equipment switching.

| GO 167 Reference | GO 167 Definition |
|---|---|
| GO 167-B, Appendix E, OS 1: Safety states: | "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 |
| 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 12: Operations Conduct states in part: | "To ensure safety, and optimize plant availability, the GAO conducts operations systematically, professionally, and in accordance with approved policies and procedures. The GAO takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow plant and operation procedures and instructions while taking responsibility for safety. Among other things: A. All personnel follow approved policies and procedures. Procedures are current, and include a course of action to be employed when an adopted procedure is found to be deficient." |
| GO 167-B, Appendix E, OS 17: Records of Operation states: | "The GAO assures that data, reports and other records reasonably necessary for ensuring proper operation and monitoring of the generating asset are collected by trained personnel and retained for at least five years, and longer if appropriate." |
| Persons Responsible | Notes |
| Jesse Sanchez | The Plant does not comply with its procedure for high voltage equipment switching. |

| Item | Finding Evidence |
|---------------------------------------|---|
| 15.1 | The Plant does not comply with its procedure for high voltage equipment switching. |
| Item | Proposed Corrective Action by EDF |
| 15.1 | Manager to review procedure with site team. |
| Item | Implemented or Planned Corrective Action by EDF |
| 15.1 | Manager reviewed procedure and retrained site personnel and documented on internal training / attendance forms. |
| Photographic Evidence Post-Correction | |

No photo available