

Shiloh I Wind Project LLC

an Oregon limited liability company
2701 NW Vaughn Street, Suite 300
Portland, Oregon 97210

April 8, 2024

Banu Acimis, P.E.
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

RE: Response to General Order (GO) 167 Compliance Audit of Shiloh Wind Project
Audit Number GA2023-16SW

Dear Banu Acimis,

This letter is in response to the above referenced audit report GA2023-16SW related to the Shiloh I Wind Project (the “Company”) and provides the requested corrective actions detailing steps taken or planned to be taken in order to resolve the findings and recommendations identified in the California Public Utilities Commission (the “CPUC”) audit report dated January 22 – 24, 2024. Following your review, we look forward to a follow-up meeting to clarify any of the items as necessary.

Finding 1: The Plant lacks a standardized process for tracking maintenance work for high voltage assets.

Corrective Action Plan:

The Company believes that the following plan is a solid way to track open items as well as important initiatives and make sure they are consistent with both internal procedures and external requirements.

Items that can be managed locally by the high voltage specialists and the site are tracked by the specialists. These items are usually items that are less impactful. Items that are of higher importance, including HV issues, will be escalated and are maintained in the weekly Balance of Plant report that the Company will be updating. In this Balance of Plant (“BOP”) report all larger open items are tracked and followed up on weekly. Finally, large projects that aim to remediate impactful issues or improve performance of installations are discussed, reviewed, and approved in the beginning of the year by Company management on a quarterly basis.

The Company continues to improve processes and is on track to adopt BOP Punchlist procedure to track outstanding BOP issues – similar to the Turbine Punchlist, which the site uses to track exceptional maintenance issues. The BOP team will be trained in a digital solution that allows the High Voltage specialists to follow up and plan corrective action for

pending items directly in the Maintenance Tracking system in the Company's software: SAP, facilitated through a custom-made interface called FUSION (also known as GPM). Below is a screen shot of the updated Monthly Substation Inspection Form

Equipment with the Deficiency	Describe Deficiency	APLIC Deficiency	SAP work order #	Repair Plan	Repair Status	Completion Date	Closed By
SUBSTATION MAIN TRANSFORMER	TEMPERATURE GUAGE HAS CRACKED LENSE (STILL WORKS) Sourcing new lense			MONITOR	MONITOR		
SUBSTATION MAIN TRANSFORMER	Serveron has Hydran alarm- Data visible- but in alarm state			test transformer every 6 months	MONITOR		
SUBSTATION MAIN TRANSFORMER	SERVERON VALVE residue oil		303594443	Clean	Completed	3/18/2024	ML
SUBSTATION MAIN TRANSFORMER	North top manifold has residual oil			Clean on next NERC outage 12/2024	MONITOR		
Disconnect Switch	SW545 lock don't match, needs to replace			WILL ADDRESS ON NEXT OUTAGE	PENDING		
Yard	Oil Minder control cable exposed to sun			Add cable protector	PENDING		
Control House	Control house paint is peeling.			NEED TO PAINT ON NEXT NERC	PENDING		
Yard	Gaps in fence			Add gravel by 4/15/24	PENDING		
Yard	Gap between gate			Adjust/fix gate by 4/15/24	PENDING		

Below is a screen shot of the GPM (Maintenance Tracking System, SAP) as of April 5, 2024 that shows a live status of corrective actions related to the Serverons, MPT Temp gauge, and Manifold.

A.	Do.	V.	Code	Maintenance Pla.	WT.	Pri.	Description	Status	WO	WO...	Detected	Completed	Comments	Component	ActiW.	Error...
			7000052429	ST SHILOH			Serveron has Hydran alarm- Data visible	✓			01/24/2024	0000-00-00	Operational in alarm state	Gene...	MCP	
			7000052440	ST SHILOH			MPT Temp gauge lense crack- operational	✓			01/24/2024	0000-00-00	Sourcing new lense, fully operational	Power...	MCP	
			7000052441	ST SHILOH			SW545 lock don't match, needs to replace	✓			01/24/2024	0000-00-00	Replace lock to match others next N...	Gene...	MCP	
			7000052442	ST SHILOH			Substation main transformer serveron val	✓	303594443	TEC...	01/24/2024	03/18/2024	Cleaned	Power Tr...	MCP	
			7000052443	ST SHILOH			North top manifold has residual oil	✓			01/24/2024	0000-00-00	Clean next NERC 12/2024	Power...	MCP	
			7000052444	ST SHILOH			Oil Minder control cable exposed to sun	✓			01/24/2024	0000-00-00	Add wire loom tubing to protect wire	Gene...	MCP	
			7000052445	ST SHILOH			Control house paint is peeling.	✓			01/24/2024	0000-00-00	Paint. Area within MAD during NER...	Gene...	MCP	
			7000052446	ST SHILOH			The fence around the yard has gaps in it	✓			01/24/2024	0000-00-00	Fill with rock/delivery 4/8/24	Gene...	MCP	
			7000052447	ST SHILOH			The front gate of substation has gap, ne	✓			01/24/2024	0000-00-00	Adjust/fill with rock/delivery 4/8/24	Gene...	MCP	

Regarding the CPUC's concern about a transformer oil temperature gauge, the language to describe the gauge in the monthly inspection report indicated the gauge was not working. However, the gauge is operational, and just the protective lens was cracked. The gauge did not pose a danger to the operation of the transformer. The Company is working to replace the lens as quickly as possible.

Regarding the Hydran, the Hydran is operational and is reporting in alarm status. The company policy at the time of the audit was to perform an annual oil sampling for operational devices. The Company will continue to re-evaluate the testing period, as needed.

Completion Date:

As of April 15, 2024, the Fusion program will be rolled out to include BOP at all sites.

Finding 2: Hazardous waste containers are corroded.

Corrective Action Plan:

The Company is subcontracting the waste management to a third party who provides the site with containers and replaces the containers when they are full. The Company has notified the supplier to immediately remove the corroded containers and make sure that future containers must align with regulation and must not be compromised in any other way. The Company will also be inspecting containers on delivery to ensure compliance. The Company is working on a fleet-wide change to our controlled waste inspections to include looking at container condition, emergency response resources, clutter and labeling.



Planned Completion Date:

January 24, 2024

Finding 3: Oil seepage and bird nest found at main transformer.

Corrective Action Plan:

Regarding the oil seepage finding, Spill Prevention Containment Countermeasure (SPCC) audits indicated that there was a previous leak from the manifold and another leak from Serveron valve, both of which resulted in stains. During the 2021 NERC Outage, the Serveron valve and the manifold were both tightened, but the stains were not sufficiently cleaned up. What was seen as seepage during the 2024 audit was actually a stain from this previous leak. The stained Serveron valve was cleaned on March 18, 2024 and the stained manifold will be cleaned in the next NERC outage scheduled Dec 10-13, 2024.

Evidence of the cleaned Serveron valve can be seen in the picture below.



Planned Completion Date:

Serveron valve was cleaned March 18, 2024

Manifold will be cleaned during the NERC Outage scheduled December 10-13, 2024

Regarding the bird nest, we do not agree with the finding. ESRB has interpreted the CDFW code but has not provided a basis for that interpretation. ESRB's interpretation is "that removal of the bird nest in order to maintain equipment operation is acceptable, provided that the nest is not an active nest."

The Company is able to properly maintain the equipment operation without disturbing the bird nest.

California Department of Fish and Wildlife (CDFW) regulates nesting birds utilizing Fish and Game Code (F&GC) sections 3503, 3503.5, and 3513 (among others). In particular, F&GC section 3503 states, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." Per email communication with CDFW on March 18, 2024 CDFW "generally offers the same protections for nests with or without eggs/active incubation." There is no exception for inactive nests. The Company continues to adhere to the law, and guidance from CDFW in this regard.

Finding 4: Insufficient grading and water drainage at WTG F4.

Corrective Action Plan:

Regrading will be performed at WTG F4 to remove the accumulation of water. As the Company feels we can constantly improve our process, we will be carrying out a site-wide campaign at Shiloh this year to record the condition of the foundations. Inspections will be performed by an experienced foundation vendor. Part of the scope is to prepare a report for each foundation, so if there are concerns with items such as pooling water, they will be noted, and corrective measures will be defined.

Evidence of the remediated grading at the foundation area can be seen in the picture below.



Completion Date:

WTG F4 foundation remediated April 8, 2024.

Finding 5: Missing bolt covers.

Corrective Action Plan:

There is no requirement to have bolt caps installed on the foundation bolts. In general, if caps are present, they are maintained unless we have reason to remove them. When maintenance is performed, e.g., measurement or re-tension, the caps must be removed. In general, we have asked that the vendors return the caps after work is performed. It is often NOT possible to remove the caps without damaging them, thereby making re-installation pointless.

The Company considers the corrosion on the bolts to be superficial and not affecting stability of towers. Additionally, the Company has found evidence that when the caps exhibit wear and tear (e.g., cracking) they act to entrap humidity and water which bears the risks of severe corrosion.

The Company will be reviewing its process to determine if there should be some kind of barrier on the bolts installed to limit exposure to the environment or leave them uncovered. This will be reviewed the summer of 2024.

Completion Date:

Summer 2024

If you have any questions, please contact Chad Brown at 707-378-3359 or via e-mail at Chad.Brown@Avangrid.com.

Thank you,

Chad Brown
Plant Manager
Shiloh I Wind Project