

Henrietta Solar Facility CPUC Audit GA2024-02HS: SPC Response

Southern Power Company  
30 Ivan Allen Jr Blvd NW  
Atlanta, GA 30308

May 1, 2024

Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

**RE: Generation Audit of Henrietta Solar Facility (Henrietta) – Audit Number GA2024-02HS**

Dear Brandon Vasquez,

In response to the audit report regarding the generation audit of Henrietta Solar from February 5-7, 2024, please see below for the Corrective Action Plan for the listed findings and observations.

If you have any questions or concerns regarding this audit, please contact Clarissa Michaud at [cmichaud@southernco.com](mailto:cmichaud@southernco.com) and Glen Parker at [gjparker@southernco.com](mailto:gjparker@southernco.com).

Respectfully,

Clarissa Michaud  
Compliance Team Leader  
Southern Power Company

CPUC Audit GA2024-02HS:  
Henrietta Solar Facility  
February 5-7, 2024

## **CORRECTIVE ACTION PLAN**

By  
Southern Power Company  
May 1, 2024

## OVERVIEW

### Findings



Finding	Description	Status	Completion Date
1	Henrietta Solar needs to install and/or replace deteriorated high voltage signage.	In Progress	7/31/2024
2	The Plant needs to install and/or replace deteriorated confined space signs.	Completed	4/24/2024
3	The Plant needs to promptly correct oil leaks.	In Progress	5/24/2024
4	The Plant has not conducted fire protection system inspections every 3 years.	Completed	4/30/2024
5	Vegetation control around inverters - grass growing into the inverter and very close to the surrounding concrete base.	Completed	3/31/2024

### Observations

Observation	Description	Status	Completion Date
1	ESRB staff observed that notes in Plant records lacked detail.	In Progress	5/31/2024

## FINDINGS

### Finding 1. Henrietta Solar needs to install and/or replace deteriorated high voltage signage.

Action	Issue	Description of Action	Assigned Person	Maximo WO	Date
1	Stickers on west side of inverters: Location Nomenclature stickers	The signage should denote location of inverter, ex: "A01-INV04". Site team is currently working on removing the old sign and using stencils and high temperature paint to permanently re-create the sign. Some inverters are complete, site is in progress.	G. Parker	HRS1931	7/31/24
<p>Finding</p> 		<p>Corrected Example</p> 			
2	Stickers on south side of inverters: Arc Flash labels and Electrical Shock Hazard labels were peeling and illegible.	New Arc Flash stickers are being printed by SPC personnel and will be hung promptly upon receipt. New adhesive back signs for Electrical Shock Hazard will be ordered. Test decals for longer-lasting stickers are being tested. Signage is evaluated annually during safety/compliance ORB assessment.	G. Parker, M. Lagunas	HRS1931	7/31/24

**Finding 2. The Plant needs to install and/or replace deteriorated confined space signs.**

Action	Issue	Description of Action	Assigned Person	Maximo WO	Date
1	Deteriorated confined space sign on manhole of main power transformer in substation	New Confined Space signs were ordered and were placed during 4/24/24 outage to fix leak (see Finding 3). Grainger item is #465K40.	L. Stephens	HRS1932	4/24/24

Finding



Corrected



**Finding 3. The Plant needs to promptly correct oil leaks.**

Action	Issue	Description of Action	Assigned Person	Maximo WO	Date
1	Main transformer in substation had a minor oil leak. Oil leak was noted for months prior on substation inspection form and had not been resolved. RESA Power had evaluated the leak and determined it required monitoring and cleaning.	Site has worked with RESA power to begin repair process. Work began on 4/24/24 to clean the leak, and additional work to repair the leak is scheduled for May.	L. Stephens	HRS1925	5/24/24

Finding



Corrected



**Finding 4. The Plant has not conducted fire protection system inspections every 3 years.**

Action	Issue	Description	Assigned Person	Maximo WO	Date
1	Site had not had fire protection system inspections.	Cosco Fire Protection, the SPC preferred vendor, was contacted and inspected the site April 29. Documentation of fire system inspection will be attached to PO and WO upon receipt. Annual PM is in place to conduct fire protection inspections.	C. Michaud, G. Parker	HRS1819, Annual PM: HRS1214	4/30/24

**Finding 5. Vegetation control around inverters – grass growing into the inverter and very close to the surrounding concrete base.**

Action	Issue	Description	Assigned Person	Maximo WO	Date
1	Overgrown vegetation extending under inverter, including cut or dead vegetation. Proximity of vegetation poses a potential fire hazard and safety risk.	Henrietta Solar has moved to pre-emergent spraying to remove all vegetation from the site to remove any potential energy source for fire. Spraying was completed in March 2024, and will be utilized on an ongoing basis to appropriately control vegetation growth in accordance with our weed abatement plan.	G. Parker	HRS1833-110	3/31/24

Finding



Corrected



**OBSERVATIONS**

**Observation 1. ESRB staff observed that notes in Plant records lacked detail.**

Action	Issue	Description	Assigned Person	Maximo WO	Date
1	Evacuation Drill Report & Critiques lacked detail in notes in Maximo	Submitting request through Maximo to update Job Plan for the annual PM. Compliance and Safety personnel clarified expectations with site team.	C. Michaud	HRS1072	5/31/24
2	Substation inspection records lacked detail	Substation inspection is being uploaded in Maximo and will include significant notes sections and increased detail.	C. Kinstle	N/A	5/31/24