

DOCKETED

Docket Number:	09-AFC-06C
Project Title:	Blythe Solar Power Project - Compliance
TN #:	269202
Document Title:	RY 2025 BLYTHE ANNUAL COMPLIANCE REPORT 09-AFC-6C
Description:	N/A
Filer:	Cynthia Keller
Organization:	NexteraEnergy Resources
Submitter Role:	Applicant
Submission Date:	3/15/2026 6:45:09 PM
Docketed Date:	3/16/2026

RY 2025 ANNUAL COMPLIANCE REPORT

BLYTHE SOLAR POWER PROJECT UNITS 1, 2, 3, & 4

Docket # 09-AFC-6C

Prepared for:

California Energy Commission

Attn: Anwar Ali

Bureau of Land Management

Palm Springs South Coast Field Office

Attn: Carlos Blandon

Prepared by:

Blythe Solar Energy Center, LLC

March 2026

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
Table of Contents	
1 INTRODUCTION	4
1.1 Project Overview.....	4
1.2 Annual Reporting Requirements	4
2 OPERATION STATUS.....	5
3 CONDITIONS OF CERTIFICATION.....	6
3.1 Compliance and Closure	6
3.2 Engineering	6
3.3 Public Health and Safety	7
3.4 Environmental.....	7
3.5 Local Impacts.....	8
3.6 Project Incidents and Corrective Actions.....	8
4 CONDITIONS OF CERTIFICATION CHANGES.....	9

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

TABLE OF CONTENTS (CONTINUED)

TABLES

Table 1 Waste Generation, Management, and Disposal Summary

9

APPENDICES

- A BSPP Compliance Matrix
- B Hazardous Materials Inventory (CERS filing)
- C Annual Notice of Extraction and Diversion of Water
- D Riverside County Fire Department Annual Payment
- E BIO-2 through BIO-26 Biological Resources
- F AQ-SC-6: List of Equipment

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

1 INTRODUCTION

1.1 Project Overview

NextEra Blythe Solar Energy Center, LLC has completed construction of Units 1, 2, 3, and 4 of the Blythe Solar Power Project (BSPP or Project), a 485-megawatt photovoltaic (PV) solar power generation facility on over 2,000 acres of Bureau of Land Management (BLM) administered land in unincorporated Riverside County, California. The Project was initially approved by the BLM and California Energy Commission (CEC) as a 1,000-megawatt solar thermal energy generating facility before modifying the project to a PV solar facility. The completed BSPP PV facility was built within the planned footprint of the approved thermal energy facility. Construction of Blythe Units 1 & 2 included the solar arrays, support facilities, and shared linear facilities (shared with the neighboring McCoy Solar Energy Project). The BSPP Units 1 & 2 entered project operations on October 29, 2016.

NextEra Blythe Solar Energy Center, LLC finished construction of BESS Storage Units 1 through 4 in late 2022.

1.2 Annual Reporting Requirements

The CEC Presiding Member's Proposed Decision for the modified project, which contained revised findings and the Conditions of Certification (COC), was approved by the Commission on January 15, 2014. COC COM-7 requires NextEra Energy Resources, LLC to submit an Annual Compliance Report (ACR) to the CEC Compliance Project Manager (CPM) throughout operations:

COM-7: Annual Compliance Report

After construction is complete, the project owner shall submit searchable electronic ACRs instead of MCRs. ACRs shall be completed for each year of commercial operation, may be required for a specified period after decommissioning to monitor closure compliance, as specified by the CPM, and are due each year on a date agreed to by the CPM. The searchable electronic copies may be filed on an electronic storage medium or by e-mail, subject to CPM approval. Each ACR shall include the AFC number, identify the reporting period, and contain the following:

- 1. an updated compliance matrix showing the status of all conditions of certification (fully satisfied conditions do not need to be included in the matrix after they have been reported as completed);*
- 2. a summary of the current project operating status and an explanation of any significant changes to facility operations during the year;*

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

3. *documents required by specific conditions to be submitted along with the ACR. Each of these items shall be identified in the transmittal letter with the condition it satisfies, and submitted as attachments to the ACR;*
4. *a cumulative list of all post-certification changes approved by the Energy Commission or the CPM;*
5. *an explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;*
6. *a list of filings submitted to, or permits issued by, other governmental agencies during the year;*
7. *a projection of project compliance activities scheduled during the next year;*
8. *a list of the year's additions to the on-site compliance file;*
9. *an evaluation of the Site Contingency Plan, including amendments and plan updates; and*
10. *a list of complaints, notices of violation, official warnings, and citations received during the year, a description of how the issues were resolved, and the status of any unresolved matters.*

Additionally, certain COCs require annual reporting and/or development of a mitigation plan, which may also contain operations reporting requirements.

The Bureau of Land Management (BLM), as the federal agency responsible for management of public lands on which the project is sited, approved the modified BSPP in a Record of Decision (ROD) for the project on August 1, 2014, and authorized the construction of the project in a Right-of-Way (ROW) Grant (serialized as CACA-048811) on August 12, 2014. Appendix 5, Adopted Mitigation Measures, of the BLM ROD, contains all ROW grant holder-proposed Design Features (DF) and Mitigation Measures for the project. Design Features in the ROD incorporate the CEC's COCs, some of which require annual reporting.

The annual operations reporting requirements outlined in COM-7, the design features, mitigation measures, and additional COC reporting requirements applicable to the operating units are addressed in this Annual Compliance Report.

2 OPERATION STATUS

Units 1 and 2 of the BSPP entered the operations phase on October 29, 2016. Unit 3 and Unit 4 entered operation in the later part of year 2020. This ACR has been prepared to provide information about the status of operations activities as well as Conditions of Certification and Mitigation Measures which are applicable to the reporting period from January 1st through December 31st of 2023 for units 1, 2, 3 & 4. Units 3 and 4 have been fully operational for two years now and therefore included in this reporting year (RY 2023). BESS storage units 1-3 have been fully functional for a full year. BESS storage 4 has been fully functional since late 2022.

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

3 CONDITIONS OF CERTIFICATION

Compliance with the CEC Conditions of Certification and the BLM's Record of Decision is categorized into the following sections, consistent with the CEC's Commission Decision structure: Compliance and Closure (Section 3.1), Engineering (Section 3.2), Public Health and Safety (Section 3.3), Environmental (Section 3.4), and Local Impacts (Section 3.5). Each of the COCs described below is presented for one, or both, of the following reasons: (1) the COC reporting requirement is specifically required to be addressed in the annual compliance report or (2) the COC is related to mitigation that was implemented during this reporting period.

3.1 Compliance and Closure

3.1.1 COM-5: Compliance Matrix

The Compliance Matrix is provided in **Appendix A**.

3.1.2 COM-11: Reporting of Complaints, Notices, and Citations

No complaints (including noise and lighting complaints), notices of violation, notices of fines, official warnings, or citations were received during this reporting period.

3.2 Engineering

3.2.1 TLSN-2: Transmission Line-Related Complaints

No line-related complaints were received during this reporting period.

3.2.2 TLSN-4: Transmission Line Inspections

Inspections were conducted of the Transmission line. No combustible materials were found. As a result of the inspection no further actions were required.

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

3.3 Public Health and Safety

3.3.1 AQ-SC-6: List of Equipment

Included as **Appendix F** is the Blythe vehicle and equipment list.

3.3.2 HAZ-1: Hazardous Materials List

Included as **Appendix B** is the CERS Hazardous Material Inventory for the reporting year containing all hazardous materials contained at the facility.

3.3.3 HAZ-6: Operations Site Security Plan Implementation

All project employee background investigations have been performed and all contractors have provided signed statements certifying that background investigations have been conducted on contractors working onsite in accordance with the OSSP. In addition, the hazardous materials transport vendors have prepared and implemented security plans in accordance with the OSSP.

3.3.4 WORKER SAFETY-7: Riverside County Fire Department Annual Payment

Annual payment to the Riverside County Fire Department attached as **Appendix D**

3.3.5 WORKER SAFETY-9: RCFD Inspection Fees

During this reporting period, no inspection fees were required in addition to the annual payment.

3.3.6 WORKER SAFETY-10: Heat Related and Valley Fever Incidences

During this reporting period, there have been no potential heat-related or Valley Fever incidents reported.

3.4 Environmental

3.4.1 BIO-2 through BIO-26: Biological Resources

During project operation, the Designated Biologist (DB) is required to submit record summaries in the ACR unless his or her duties cease, as approved by the CPM. The DB was on-call during this reporting period. The DB served as the lead biological contact for the project owner and the agencies. The Designated Biologist's Report are enclosed as **Appendix E**.

3.4.2 SOIL AND WATER-1 & 19: Erosion Control and Drainage

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

In accordance with the approved Storm Water Damage Monitoring and Response Plan, the operations Designated Inspector is completing post-storm site inspections to identify any potential erosion control issues during operations. During this reporting period, the Designated Inspector found no breaches or damage to the Permanent Security Fence/Desert Tortoise Fence. No panels or support structures were damaged or eroded past the Minimum Depth Stability Threshold.

3.4.3 SOIL AND WATER-4 & 5: Groundwater Monitoring

The 2025 fourth quarter Groundwater Monitoring Report was submitted under a separate cover in January 2026.

3.4.4 SOIL AND WATER-9: Notice of Extraction and Diversion

A copy of the Notice of Extraction and Diversion filed during the reporting year is included as **Appendix C**.

3.4.5 WASTE-7 & WASTE-10: Hazardous Waste Generation Reporting and Solid Waste Disposal Actions

No hazardous waste was generated during the reporting year.

Table 1
Waste Generation, Management, and Disposal Summary

Waste Type	Volume or Weight	Disposal/Recycling Facility	Disposal Action
None	-	-	-

3.5 Local Impacts

3.5.1 VIS-1: Surface Treatment

All surfaces remained in good condition and no preventative maintenance activities occurred during this reporting period. There are currently no scheduled maintenance activities planned for 2025.

3.6 Project Incidents and Corrective Actions

No non-compliance incidents or corrective actions were issued or identified during this reporting period.

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

4 CONDITIONS OF CERTIFICATION CHANGES

A list of CPM approved Post-certification Changes to the operations of the BSPP is included here:

- The CPM determined that COCs BIO-19, BIO-25, and BIO-26 do not require any action during operations for Units 1 and 2 until further unit construction or the evaporation ponds are built.
- The CPM confirmed on 8-7-2017 that an SPCC Plan is not required at BSPP and that the Oil Spill Plan submitted by BSPP is equivalent to the SPCC Plan and acceptable for the purpose of meeting HAZ-2 SPCC requirements.
- The CPM confirmed on 1-3-2017 that the Provisional Closure Plan required by COC COM-15 can be submitted one year after the start of commercial operation and that the sixty-day reference in the COC verification should be disregarded.

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Appendix A

BSPP Compliance Matrix

Blythe Solar Compliance Matrix 2025

Matrix Item #	Cond. #	Activity Description	Project Phase	Technical Area	Recurrence	Status	Submittal Due Date	Submittal Date	Agency Approval	Additional Requirements
1	AQ-SC-6	The project owner, when obtaining dedicated on-road or off-road vehicles for panel washing activities and other facility maintenance activities, shall only obtain vehicles that meet California on-road vehicle emission standards or appropriate U.S.EPA/California off-road engine emission standards for the latest model year available when obtained.	O	Equipment	N/A	Ongoing	N/A	N/A	N/A	
2	AQ-SC-7	The Site Operations Fugitive Dust Control Plan shall include the use of durable non-toxic soil stabilizers on all regularly used unpaved roads and disturbed off-road areas, or alternative methods for stabilizing disturbed off-road areas, within the project boundaries, and shall include the inspection and maintenance procedures that will be undertaken to ensure that the unpaved roads remain stabilized.	O	BLM/CEC	ROD/CEC Approval	PGD	n/a		General	
3		The project owner shall provide Energy Commission, CDFW, and USFWS and BLM staff with reasonable access to the project site and compensation lands under the control of the project owner and shall otherwise fully cooperate with the Energy Commission's and BLM's efforts to verify the project owner's compliance with, or the effectiveness of, mitigation measures set forth in the Conditions of Certification.	CO	Biology	N/A	Ongoing	N/A	N/A	N/A	
4	BIO-11	4. Notification of Injured, Dead, or Relocated Listed Species. If an injured or dead listed or special status species is detected within or near the Project Disturbance area, the CPM, the Ontario Office of CDFW, and Palm Springs Office of USFWS shall be notified immediately by phone and email, or as otherwise directed by the CPM or, in the case of avian species, controlling permits as issued by the USFWS. Notification shall occur no later than noon on the business day following the event if it occurs outside normal business hours so that the agencies can determine if further actions are required to protect listed species (within 8 hours in the case of desert kit fox). Written follow-up notification via FAX or electronic communication shall be submitted to these agencies within two calendar days of the incident and include the following information as relevant:	CO	BLM/CEC	ROD/CEC Approval				No Action Unless Event Occurs	
5		a. Injured Desert Tortoise. If a desert tortoise is injured as a result of project-related activities during construction, the Designated Biologist or approved Biological Monitor shall immediately take it to a CDFW- approved wildlife rehabilitation and/or veterinarian clinic. Any veterinarian bills for such injured animals shall be paid by the project owner. Following phone notification as required above, the CPM, CDFW, and USFWS shall determine the final disposition of the injured animal, if it recovers. Written notification shall include, at a minimum, the date, time, location, circumstances of the incident, and the name of the facility where the animal was taken. b. Desert Tortoise Fatality. If a desert tortoise is killed by project-related activities during construction or operation,		BLM/CEC						
6		No later than 2 days following the above required notification of a sighting, kill, or relocation of a listed species, the project owner shall deliver to the CPM, BLM, CDFW, and USFWS via FAX or electronic communication the written report from the Designated Biologist describing all reported incidents of injury, kill, or relocation of a listed species, identifying who was notified, and explaining when the incidents occurred. In the case of a sighting in an active construction area, the project owner shall, at the same time, submit a map (e.g., using Geographic Information Systems) depicting both the limits of construction and sighting location to the CPM, BLM, CDFW and USFWS.		BLM/CEC						
7	BIO-12	Within 90 days after completion of all project related ground disturbance, the project owner shall provide to the CPM, CDFW, BLM and USFWS an analysis, based on aerial photography, with the final accounting of the amount of habitat disturbed during project construction. This shall be the basis for the final number of acres required to be acquired.	CO	BLM/CEC	ROD/CEC Approval		N/A			
8	BIO-13	Within 30 days after completion of project construction, the project owner shall provide to the CPM for review and approval, a written report identifying which items of the Raven Plan have been completed, a summary of all modifications to mitigation measures made during the project's construction phase, and which items are still outstanding.	CO	BLM/CEC	ROD/CEC Approval	PGD, Dudek	12/31/2020		Action Submittal	
9		As part of the annual compliance report, each year following construction the Designated Biologist shall provide a report to the CPM that includes: a summary of the results of raven management and control activities for the year; a discussion of whether raven control and management goals for the year were met; and recommendations for raven management activities for the upcoming year.	OP	BLM/CEC						
10	BIO-14	Within 30 days after completion of project construction, the project owner shall provide to the CPM for review and approval, a written report identifying which items of the Weed Management Plan have been completed, a summary of all modifications to mitigation measures made during the project's construction phase, and which items are still outstanding.	CO	BLM/CEC	ROD/CEC Approval		12/31/2020		Action ACR	
11		As part of the annual compliance report, each year following construction the Designated Biologist shall provide a report to the CPM that includes: a summary of the results of noxious weeds surveys and management activities for the year; a discussion of whether weed management goals for the year were met; and recommendations for weed management activities for the upcoming year.		BLM/CEC						
12		The project owner shall implement a Weed Management Plan (Plan) that meets the approval of the CPM. The objective of the Plan shall be to prevent the introduction of any new weeds and the spread of existing weeds as a result of project site mobilization, construction, operation, and closure.	All	Weed Management	N/A	Ongoing	N/A	N/A	N/A	The draft Weed Management Plan submitted by the previous owner (AECOM 2010a, Attachment DR-BIO-97) shall provide the basis for the final plan, subject to review and revisions from the CPM and the BLM.
13	BIO-15	Reporting Protocol: Verification of Survey Results (including preconstruction bird and bat use, mortality monitoring, and golden eagle monitoring): All survey results and complete reports, including raw data, shall be submitted to the CPM after each survey season and in an annual summary report throughout the course of the study period, or as otherwise directed by the CPM. The results of onsite injury and mortality monitoring will be reported monthly or more frequently, if requested by the CPM. Post-construction monitoring studies included in the BBSC shall be for at least two years following commencement of commercial operation of each individual unit.	CO	Bird and Bat	Quarterly	Ongoing		3/6/2018		Multiple completion dates
14		The reports shall also assess any adaptive management measure implemented during the prior year as approved by the CPM. After the second year of the monitoring program, the CPM shall meet and confer with the TAC and shall use the criteria contained in the BBSC to determine if subsequent monitoring periods are warranted		Bird and Bat	Annually					

Blythe Solar Compliance Matrix 2025

15		If a carcass or injured special status species is found at any time by the monitoring study or project operations staff, the project owner, Designated Biologist, or other qualified biologist that may be identified by the Designated Biologist shall contact the CPM, CDFW and USFWS by email, fax or other electronic means within one working day of any such detection. Verification of other injuries or mortalities shall be within 48 hours, or as otherwise directed by the CPM.	CO	BLM/CEC	ROD/CEC Approval				
16	BIO-16	3. During operations and maintenance prior to mowing and any other vegetation maintenance during the nesting season, (February 1 through July 31) a single survey shall be conducted within 7 days of construction or maintenance activity to determine whether birds are nesting in the vegetation on site;	OP	BLM/CEC	ROD/CEC Approval	PGD		Action	If active nests or suspected active nests are detected during the survey, (including mowing and vegetation maintenance surveys during operations), a buffer zone (protected area surrounding the nest, the size of which is to be determined by the Designated Biologist in consultation with CDFW) and monitoring plan shall be
17		iii. Active natal/pupping dens. If an active natal den (a den with pups) is detected on the site, the project owner shall proceed to implement the approved Plan and shall also notify the BLM, CPM, and CDFW within 24 hours. A 500-foot no-disturbance buffer shall be maintained around all active dens.	CO	BLM/CEC	ROD/CEC Approval				
18		c. Exception for American badger. In the event that passive relocation techniques fail for badgers, outside the denning season, or during the denning season if individual badgers can be verified to not have a litter, then live-trapping by a CDFW and CPM approved trapper is an option that may be employed to safely perform active removal as a last resort.		BLM/CEC					
19		Notify the CPM, BLM and CDFW if injured, sick, or dead American badger and desert kit fox are found. If an injured, sick, or dead animal is detected on any area associated with the solar project site or associated linear facilities, the CPM, BLM Palm Springs/ South Coast Field Office and the Ontario CDFW Office as well as the CDFW Wildlife Investigation Lab (WIL) shall be notified immediately by phone (8 hours in the case of a fatality). Written follow-up notification via FAX or electronic communication shall be submitted to the CPM, BLM and CDFW within 24 hours of the incident and shall include the following information as appropriate:		BLM/CEC					
20		No later than 24 hours following a phone notification of an injured, sick, or dead American badger or desert kit fox, the project owner shall provide to the CPM, BLM and CDFW, via FAX or electronic communication, a written report from the Designated Biologist describing the incident of sickness, injury, or death of an American badger or desert kit fox, when the incident occurred, and who else was notified.		BLM/CEC					
21	BIO-17	5. Additional protection measures to be included in the Plan and implemented: a. All pipes within the project disturbance area outside the solar plant site, or inside the solar plant site if foxes are still on the site, must be fenced, capped and/or covered every evening or when not in use to prevent desert kit foxes or other animals from accessing the pipes and/or monitored. b. All project-related water sources shall be covered and secured when not in use to prevent drowning.	All	Fox and Badger	N/A	Ongoing	N/A	N/A	N/A
22		f. In order to reduce the likelihood of distemper transmission: i. No pets shall be allowed on the site prior to or during site mobilization and construction, operation, and non-operation and closure, with the possible exception of vaccinated kit fox scat detection dogs during preconstruction surveys, and then only with prior CPM and CDFW approval; ii. Any hazing activities that include the use of chemical or other repellents (e.g. ultrasonic noise makers, or non-animal-based chemical repellents) must be cleared through the CPM and CDFW prior to use. The use of animal tissue or excretion based repellents (e.g. coyote urine, anal gland products) is not permitted. iii. Any sick or diseased kit fox, or documented kit fox mortality shall be reported to the CPM, CDFW, and the BLM immediately upon identification (within 8 hours for mortality). If a dead kit fox is observed, it shall be collected and stored according to established protocols distributed by CDFW WIL, and the WIL shall be contacted to determine carcass suitability for necropsy.		Fox and Badger	N/A	Ongoing	N/A	N/A	N/A
23		Within 30 days of participation in the CDFW led fee based Monitoring and Mitigation Program during site mobilization and construction or operation the project owner will submit a revised Plan that includes the program information related to the project and confirmation that all fees are paid.		Fox and Badger	N/A	Ongoing	N/A	N/A	N/A
24	BIO-18	2. Implement Burrowing Owl Mitigation Plan. The project owner shall implement measures described in the final Burrowing Owl Mitigation Plan. The final Burrowing Owl Mitigation Plan shall be approved by the CPM, in consultation with BLM, USFWS and CDFW	CO	BLM/CEC	ROD/CEC Approval				a. Establish Non-Disturbance Buffer. b. Signs shall be posted in English and Spanish at the fence line c. Monitoring: If construction activities would occur within 500 feet of the occupied burrow during the nesting season (February 1 – August 31st)
25		Implement Avoidance Measures. If an active burrowing owl burrow is detected within 500 feet from the Project Disturbance Area, avoidance and minimization measures shall be implemented:		BLM/CEC					
26		Within 30 days after completion of construction the project owner shall provide to the CDFW and CPM a written report identifying how mitigation measures described in the plan have been completed.		BLM/CEC					
27		The project owner shall immediately provide written notification to the CPM, CDFW, USFWS, and BLM if it detects a State- or Federal-Listed Species, or BLM Sensitive Species at any time during its late summer/fall botanical surveys or at any time thereafter through the life of the project, including conclusion of project decommissioning.	CO	BLM/CEC	ROD/CEC Approval		1/31/2015		
28	BIO-19	The project owner shall submit a monitoring report every year for the life of the project to monitor effectiveness of protection measures for all avoided special-status plants to the CPM and BLM State Botanist. The monitoring report shall include: dates of worker awareness training sessions and attendees, completed CNDDDB field forms for each avoided occurrence on-site and within 100 feet of the project boundary off-site, and description of the remedial action, if warranted and planned for the upcoming year. The completed forms shall include an inventory of the special-status plant occurrences and description of the habitat conditions, an indication of population and habitat quality trends.		BLM/CEC					
29		Designated Botanist. An experienced botanist who meets the qualifications described in Section B-2 below shall oversee compliance with all special-status plant avoidance, minimization, and compensation measures described in this Condition throughout construction and closure. The Designated Botanist shall oversee and train all other Biological Monitors tasked with conducting botanical survey and monitoring work. During operation of the project, the Designated Botanist shall be responsible for protecting special-status plant occurrences within 100 feet of the project boundaries.	CO	Vegetation	N/A	Ongoing	N/A	N/A	N/A

**Blythe Solar
Compliance Matrix 2025**

30	BIO-19A	c. Special-Status Plant Worker Environmental Awareness Program (WEAP). The WEAP (BIO-6) shall include training components specific to protection of special-status plants as outlined in this Condition. d. Herbicide and Soil Stabilizer Drift Control Measures. Special-status plant occurrences within 100 feet of the Project Disturbance Area shall be protected from herbicide and soil stabilizer drift. The Weed Control Program (BIO-14) shall include measures to avoid chemical drift or residual toxicity to special-status plants consistent with guidelines such as those provided by the Nature Conservancy's The Global Invasive Species Team ¹¹ , the U.S. Environmental Protection Agency, and the Pesticide Action Network Database ¹² . e. Erosion and Sediment Control Measures. Erosion and sediment control measures shall not inadvertently	All	Vegetation	Annually	Ongoing	N/A	N/A	N/A	
31		f. Avoid Special-Status Plant Occurrences. Areas for spoils, equipment, vehicles, and materials storage areas; parking, equipment and vehicle maintenance areas, and wash areas shall be placed at least 100 feet from any ESAs. g. Monitoring and Reporting Requirements. The Designated Botanist shall conduct weekly monitoring of the ESAs that protect special-status plant occurrences during construction and decommissioning activities.	All	Vegetation	N/A	Ongoing	N/A	N/A	N/A	
32		Initial Protection and Habitat Improvement. The project owner shall fund activities that the CPM requires for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands.	CO	BLM/CEC	ROD/CEC Approval					For information on Interest, Principle, Pooling of Funds and other expenses refer to BIO-19DI.
33	BIO-19DI	Interest, Principal, and Pooling of Funds. The project owner shall ensure that an agreement is in place with the long-term maintenance and management fund (endowment) holder/manager		BLM/CEC						
34		The CPM, in consultation with CDFW, may designate another non-profit organization to hold the long-term maintenance and management fee if the organization is qualified to manage the compensation lands in perpetuity. If CDFW takes fee title to the compensation lands, CDFW shall determine whether it will hold the long-term management fee in the special deposit fund, leave the money in the REAT Account, or designate another entity to manage the long-term maintenance and management fee for CDFW and with CDFW supervision.		BLM/CEC						
35	BIO-20	Within 90 days after completion of project construction, the project owner shall provide to the CPM an analysis with the final accounting of the amount of sand dune/stabilized sand dune habitat disturbed during project construction.	CO	BLM/CEC	ROD/CEC Approval			#REF!		
36	BIO-22	Within 90 days after completion of project construction, the project owner shall provide to the CPM and CDFW an analysis with the final accounting of the amount of jurisdictional state waters disturbed during project construction.	CO	BLM/CEC	ROD/CEC Approval			#REF!		
37	BIO-23	Upon project closure the project owner shall implement a final Decommissioning and Reclamation Plan. The Decommissioning and Reclamation Plan shall include a cost estimate for implementing the proposed decommissioning and reclamation activities, and shall be consistent with the guidelines in BLM's 43 CFR 3809.550 et seq.	DM	BLM/CEC	ROD/CEC Approval	PGD	Decom		Action	
38	BIO-24	The project owner shall implement the following measures to avoid or minimize project-related construction impacts to golden eagles. 1. Annual Inventory. For each calendar year during which construction will occur and for up to two years after commercial operation begins an inventory shall be conducted to determine if golden eagle territories occur within one mile of the project boundaries. Survey methods for the inventory shall be as described in the USFWS Land Based Wind Energy Guidelines (2011b) or more current guidance from the USFWS or CPM. 2. Inventory Data: Data collected during the inventory shall include at least the following: territory status (unknown,	CO	Golden Eagle	Annually	Ongoing	7/1/2017	4/1/2019		
39		The project owner shall cover the evaporation ponds prior to any discharge with mesh netting designed to exclude birds and other wildlife from drinking or landing on the water of the ponds. Netting mesh sizes approval shall be determined by the CPM in consultation with CDFW and USFWS. The netted ponds shall be monitored regularly to verify that the netting remains intact, is fulfilling its function in excluding birds and other wildlife from the ponds, and does not pose an entanglement threat to birds and other wildlife. The ponds shall include a visual deterrent in addition to the netting, and the pond shall be designed such that the netting shall never contact the water. Monitoring of the evaporation ponds shall include the following:	CO	BLM/CEC	ROD/CEC Approval					
40		The Designated Biologists shall report any bird or other wildlife deaths or entanglements within two days of the discovery to the CPM, CDFW, and USFWS.	CO	BLM/CEC	ROD/CEC Approval					
41		3. Quarterly Monitoring. If after 12 consecutive monthly site visits no bird or wildlife deaths or entanglements are detected at the evaporation ponds by or reported to the Designated Biologist, monitoring can be reduced to quarterly visits.	O	BLM/CEC	ROD/CEC Approval				General	
42	BIO-25	4. Biannual Monitoring. If after 12 consecutive quarterly site visits no bird or wildlife deaths or entanglements are detected by or reported to the Designated Biologist and with approval from the CPM, USFWS and CDFW, future surveys may be reduced to two surveys per year, during the spring nesting season and during fall migration. If approved by the CPM, USFWS and CDFW, monitoring outside the nesting season may be conducted by the Environmental Compliance Manager.	O	BLM/CEC	ROD/CEC Approval	PGD, Dudek			General	
43		5. Modification of Monitoring Program. Without respect to the above requirements the project owner, CDFW or USFWS may submit to the CPM a request for modifications to the evaporation pond monitoring program based on information acquired during monitoring, and may also suggest adaptive management measures to remedy any problems that are detected during monitoring or modifications if bird impacts are not observed. Modifications to the evaporation pond monitoring described above and implementation of adaptive management measures shall be made only after approval from the CPM, in consultation with USFWS and CDFW.	O	BLM/CEC	ROD/CEC Approval	PGD			Submittal	
44		In addition, the project owner shall prepare and implement measures that will prevent Couch's spadefoot toads from using the evaporative basins (see Condition of Certification BIO-26)	CO	BLM/CEC	ROD/CEC Approval					
45	BIO-4	During project operation, the Designated Biologist shall submit record summaries in the Annual Compliance Report unless their duties cease, as approved by the CPM.	O	BLM/CEC	ROD/CEC Approval	Dudek	Annual		Annually	

Blythe Solar Compliance Matrix 2025

46		The project owner's construction/operation manager shall act on the advice of the Designated Biologist, Biological Monitor(s), and CPM to ensure conformance with the Biological Resources Conditions of Certification. The project owner shall provide Energy Commission staff with reasonable access to the project site under the control of the project owner and shall otherwise fully cooperate with the Energy Commission's efforts to verify the project owner's compliance with, or the effectiveness of, mitigation measures set forth in the Conditions of Certification. During operations, or when the Designated Biologist and/or Biological Monitors are not onsite,	CO	Biology	N/A	Ongoing	N/A	N/A	N/A	not onsite, the following provisions are the project owner's responsibility The Designated Biologist shall: 1. Require a halt to all activities in any area when determined that there would be an unauthorized adverse impact to biological resources if the activities continued; 2. Inform the project owner, the construction/operation manager, and the CPM when to resume activities; and 3. Notify the CPM immediately if there is a halt of any activities and advise them of
47	BIO-5	the following provisions are the project owner's responsibility The Designated Biologist shall: The Designated Biologist shall have the authority to immediately stop any activity that is not in compliance with these conditions and/or order any reasonable measure to avoid take of an individual of a listed species. If required by the Designated Biologist the project owner's construction/operation manager shall halt all site mobilization, and construction, including ground disturbance, site preparation, or permanent installation activities, including installation of desert tortoise exclusion fencing and operation activities in areas specified by the Designated Biologist.		Biology	N/A	Ongoing	N/A	N/A	N/A	
48		The project owner shall ensure that the Designated Biologist or Biological Monitor notifies the CPM and BLM immediately (and no later than the morning following the incident, or Monday morning in the case of a weekend) of any non-compliance or a halt of any site mobilization, ground disturbance, grading, construction, and operation activities, via phone and email. If the non-compliance or halt to construction or operation relates to desert tortoise or any other federal or state-listed species, the project owner shall notify the Palm Springs Office of USFWS and Ontario Office of CDFW at the same time. The project owner shall notify the CPM of the circumstances and actions being taken to resolve the problem.	C, O	BLM/CEC	ROD/CEC Approval					
49		Whenever corrective action is taken by the project owner, a determination of success or failure would be made by the CPM in consultation with BLM, USFWS and CDFW, within 5 working days after receipt of notice that corrective action is completed, or the project owner would be notified by the CPM that coordination with other agencies would require additional time before a determination can be made.		BLM/CEC						
50		The project owner shall develop and implement a Blythe Project-specific Worker Environmental Awareness Program (WEAP) and shall secure approval for the WEAP from the CPM. The project owner shall also provide the, USFWS and CDFW a copy of all portions of the WEAP relating to desert tortoise and any other federal or state-listed species for review and comment. The WEAP shall be administered to all onsite personnel. The specific program can be administered by a competent individual(s) acceptable to the Designated Biologist.	All	Training	Annually	Ongoing	N/A	N/A	N/A	
51	BIO-6	Throughout the life of the project, the WEAP shall be repeated annually for permanent employees, and shall be routinely administered within one week of arrival to any new construction personnel, foremen, contractors, subcontractors, and other personnel potentially working within the project area. Upon completion of the orientation, employees shall sign a form stating that they attended the program and understand all protection measures. These forms shall be maintained by the project owner and shall be made available to the CPM, BLM, USFWS, and CDFW and upon request. Workers shall receive and be required to visibly display a hardhat sticker or certificate that they have completed the training.	All	Training	Annually	Ongoing	N/A	N/A	N/A	
52		During project operation, signed statements for operational personnel shall be kept on file for six months following the termination of an individual's employment.	O	Training	N/A	Ongoing	N/A	N/A	N/A	
53		The project owner shall provide in the Monthly Compliance Report the number of persons who have completed the training in the prior month and a running total of all persons who have completed the training to date. At least 10 days prior to site mobilization and construction the project owner shall submit two copies of the final WEAP and implement the training for all workers.	C, O	BLM/CEC	ROD/CEC Approval		9/10/2014		MCR	
54		3. Minimize Traffic Impacts. Vehicular traffic during project construction and operation shall be confined to existing routes of travel to and from the project site, and cross country vehicle and equipment use outside designated work areas shall be prohibited. The speed limit shall not exceed 25 miles per hour within the project area, on dirt maintenance roads for linear facilities, or on dirt access roads to the project site. Private paved roads shall not exceed 45 mph; speed limits will be lowered during the tortoise's most active period (April through May and September through October [USFWS 2010]) to 35 miles per hour. The speed limit within 3 miles of the Colorado River Substation will be posted at 10 mph. Speed limit signs shall be posted on new access roads to the site.	CO	Biology	N/A	Ongoing	N/A	N/A	N/A	
55	BIO-8	7. Avoid Use of Toxic Substances. Soil bonding and weighting agents used on unpaved surfaces shall be non-toxic to wildlife and plants. 8. Minimize Lighting Impacts. Facility lighting shall be designed, installed, and maintained to prevent side casting of light towards wildlife habitat. 9. Minimize Noise Impacts. Loud construction activities (e.g., hydraulic ram, or other) shall be avoided from February 15 to April 15 when it would result in noise levels over 65 dBA in nesting habitat (excluding noise from passing vehicles). Loud construction activities may be permitted from February 15 to April 15 only if: a. the Designated Biologist provides documentation (i.e., nesting bird data collected using methods described in BIO-15 and maps depicting location of the nest survey area in relation to noisy construction) to the CPM indicating that no active nests would be subject to 65 dBA noise, OR b. the Designated Biologist or Biological Monitor monitors active nests within the range of construction-related noise exceeding 65 dBA. 10. Avoid Vehicle Impacts to Desert Tortoise. Parking and storage shall occur within the area enclosed by desert tortoise exclusion fencing to the extent feasible. No vehicles or construction equipment parked outside the fenced area shall be moved prior to an inspection of the ground beneath the vehicle for the presence of desert tortoise. If a desert tortoise is observed outside the areas permanently fenced with desert tortoise exclusion fencing, it shall be left to move on its own. If it does not move within 15 minutes, a Designated Biologist or Biological Monitor under the Designated Biologist's direct supervision may move it out of harm's way as described in the USFWS Desert Tortoise Field Manual (USFWS 2009). 11. Avoid Wildlife Pitfalls. To avoid trapping desert tortoise and other wildlife in trenches, pipes or culverts, the following measures shall be implemented:	CO	Biology	N/A	Ongoing	N/A	N/A	N/A	
56		As part of the Annual Compliance Report each year following construction, the Designated Biologist shall provide a report to the CPM that describes compliance with avoidance and minimization measures to be implemented during construction, operation, and maintenance (for example a summary of the incidence of road-killed animals during the year, implementation of measures to avoid toxic spills, erosion and sedimentation, efforts to enforce worker guidelines, etc.).	O	BLM/CEC	ROD/CEC Approval	PGD, Dudek			Submittal	

Blythe Solar Compliance Matrix 2025

57		As part of the Annual Compliance Report, each year following construction until the completion of the revegetation monitoring specified in the Revegetation Plan, the Designated Biologist or project owner shall provide a report to the CPM that includes: a summary of revegetation activities for the year, a discussion of whether revegetation performance standards for the year were met; and recommendations for revegetation remedial action, if warranted, are planned for the upcoming year.	O	BLM/CEC	ROD/CEC Approval	PGD, Dudek		ACR	
58		Desert tortoise located within the utility ROW alignments shall be moved out of harm's way in accordance with the current USFWS Desert Tortoise Field Manual. Any desert tortoise detected during clearance surveys for fencing within the project site and along the perimeter fence alignment shall be translocated and monitored in accordance with the Desert Tortoise Relocation/Translocation Plan (BIO-10). Tortoise shall be handled by the Designated Biologist(s) in accordance with the current USFWS Desert Tortoise Field Manual.	All	Biology	N/A	Ongoing	N/A	N/A	N/A
59		a. Timing, Supervision of Fence Installation. The exclusion fencing shall be installed in any area subject to disturbance prior to the onset of site clearing and grubbing in that area. The fence installation shall be supervised by the Designated Biologist and monitored by the Biological Monitors to ensure the safety of any tortoise present. b. Fence Material and Installation. All desert tortoise exclusionary fencing shall be constructed in accordance with the current USFWS' Desert Tortoise Field Manual or the most recent agency guidance with the approval of the CPM. c. Security Gates. Security gates shall be designed with minimal ground clearance to deter ingress by tortoises. The gates may be electronically activated to open and close immediately after the vehicle(s) have entered or exited to prevent the gates from being kept open for long periods of time.	All	Biology	N/A	Ongoing	N/A	N/A	N/A
60	BIO-9	d. Fence Inspections. Following installation of the desert tortoise exclusion fencing for both the permanent site fencing and temporary fencing in the utility corridors, the fencing shall be regularly inspected. If tortoise were moved out of harm's way during fence construction, permanent and temporary fencing shall be inspected at least two times a day for the first 7 days to ensure a recently moved tortoise has not been trapped within the fence. Thereafter, permanent fencing shall be inspected monthly and during and within 24 hours following all major rainfall events. A major rainfall event is defined as one for which flow is detectable within the fenced drainage. Any damage to the fencing shall be temporarily repaired immediately to keep tortoises out of the site, and permanently repaired within 48 hours of observing damage. Inspections of permanent site fencing shall occur for the life of the project. Temporary fencing shall be inspected weekly and, where drainages intersect the fencing, during and within 24 hours following major rainfall events. All temporary fencing shall be repaired immediately upon discovery and, if the fence may have permitted tortoise entry while damaged, the Designated Biologist shall inspect the area for tortoise.		Biology	Monthly	Ongoing	N/A	N/A	N/A
61		1. Desert Tortoise Exclusion Fence Installation. To avoid impacts to desert tortoises, permanent exclusion fencing shall be installed along the permanent perimeter security fence (boundaries) as phases are constructed. Temporary fencing shall be installed along any subset of the plant site phasing that does not correspond to permanent perimeter fencing. Temporary fencing shall be installed along linear features unless a Biological Monitor is present in the immediate vicinity of construction activities for the linear facility.	C, O	BLM/CEC	ROD/CEC Approval				Disturbance associated with desert tortoise exclusionary fence construction shall not exceed 30 feet on either side of the proposed fence alignment. Prior to the surveys the project owner shall provide to the CPM, BLM, CDFW and USFWS a figure clearly depicting the limits of construction disturbance for the proposed fence installation.
62		3. Monitoring Following Clearing. Following the desert tortoise clearance and removal from the power plant site and utility corridors, workers and heavy equipment shall be allowed to enter the project site to perform clearing, grubbing, leveling, and trenching activities. A Designated Biologist or Biological Monitor shall be onsite for clearing and grading activities to move tortoises missed during the initial tortoise clearance survey. Should a tortoise be discovered, it shall be relocated or translocated as described in the Desert Tortoise Relocation/Translocation Plan.	C, O	BLM/CEC	ROD/CEC Approval				
63	COM-1	Unrestricted Access. The project owner shall take all steps necessary to ensure that the CPM, responsible Energy Commission staff, and delegate agencies or consultants have unrestricted access to the facility site, related facilities, project-related staff, and the records maintained on-site to facilitate audits, surveys, inspections, and general or closure-related site visits.	CO	BLM/CEC	ROD/CEC Approval	E&C		General	Although the CPM will normally schedule site visits on dates and times agreeable to the project owner, the CPM reserves the right to make unannounced visits at any time, whether such visits are by the CPM in person or through representatives from Energy Commission staff, delegate agencies, or consultants.
64	COM-10	Amendments, Staff-Approved Project Modifications, Ownership Changes, and Verification Changes. The project owner shall petition the Energy Commission, pursuant to Title 20, California Code of Regulations, section 1769, to modify the design, operation, or performance requirements of the project or linear facilities, or to transfer ownership or operational control of the facility.	CO	BLM/CEC	ROD/CEC Approval	Development or	n/a	No Action Unless Event Occurs	Implementation of a project modification without first securing Energy Commission, or Energy Commission staff approval, may result in an enforcement action, including civil penalties
65		Reporting of Complaints, Notices, and Citations. Prior to the start of construction or decommissioning, the project owner shall send a letter to property owners within one (1) mile of the project, notifying them of a telephone number to contact project representatives with questions, complaints, or concerns. If the telephone is not staffed twenty-four (24) hours per day, it shall include automatic answering with a date and time stamp recording.	DM	BLM/CEC	ROD/CEC Approval	PGD E&C	Decom	Action	Completed 8/1/2014 before the construction of the facility. Needs to be completed again before decommissioning begins
66	COM-11	The project owner shall respond to all recorded complaints within twenty-four (24) hours or the next business day. The project site shall post the telephone number on-site and make it easily visible to passersby during construction, operation, and closure. The project owner shall provide the contact information to the CPM who will post it on the Energy Commission's web page at http://www.energy.ca.gov/sitingcases/blythe_solar/ . The project owner shall report any disruption to the contact system or telephone number change to the CPM promptly, to allow the CPM to update the Energy Commission's facility webpage accordingly.	CO	BLM/CEC		E&C	N/A	No Action Unless Event Occurs	
67		In addition to including all complaints, notices, and citations included with the MCRs and ACRs, within ten (10) days of receipt, the project owner shall report, and provide copies to the CPM, of all complaints.	CO	BLM/CEC		E&C	N/A	Unless Event Occurs	

Blythe Solar Compliance Matrix 2025

68		<p>Within one (1) hour, the project owner shall notify the CPM or Compliance Office Manager, by telephone and e-mail, of any incident at the power plant or appurtenant facilities that results or could result in any of the following:</p> <ol style="list-style-type: none"> reduction in the facility's ability to respond to dispatch (excluding forced outages caused by protective equipment or other typically encountered shutdown events); health and safety impacts on the surrounding population; property damage off-site; response by off-site emergency response agencies; serious on-site injury; serious environmental damage; or emergency reporting to any federal, state, or local agency. <p>The notice shall describe the circumstances, status, and expected duration of the incident.</p>	O	BLM/CEC	ROD/CEC Approval	PGD	n/a		No Action Unless Event Occurs	If warranted, as soon as it is safe and feasible, the project owner shall implement the safe shutdown of any non-critical equipment and removal of any hazardous materials and waste that pose a threat to public health and safety and to environmental quality
69	COM-13	<p>Within one (1) week of the incident, the project owner shall submit to the CPM a detailed incident report, which shall include, as appropriate, the following information:</p> <ol style="list-style-type: none"> a brief description of the incident, including its date, time, and location; a description of the cause of the incident, or likely causes if it is still under investigation; the location of any off-site impacts; description of any resultant impacts; a description of emergency response actions associated with the incident; identification of responding agencies; identification of emergency notifications made to other federal, state, and/or local agencies; identification of any hazardous materials released and an estimate of the quantity released; a description of any injuries, fatalities, or property damage that occurred as a result of the incident; fines or violations assessed or being processed by other agencies; name, phone number, and e-mail address of the appropriate facility contact person having knowledge of the event; and corrective actions to prevent a recurrence of the incident. 		BLM/CEC	ROD/CEC Approval	PGD	n/a			
70		The project owner shall maintain all incident report records for the life of the project, including closure. After the submittal of the initial report for any incident, the project owner shall submit to the CPM copies of incident reports within twenty-four (24) hours of a request		BLM/CEC	ROD/CEC Approval	PGD	n/a			
71		Non-Operation. If the facility ceases operation temporarily, either planned or unplanned, for longer than one (1) week (or other CPM-approved date), but less than three (3) months (or other CPM-approved date), the project owner shall notify the CPM, interested agencies, and nearby property owners. Notice of planned non-operation shall be given at least two (2) weeks prior to the scheduled date. Notice of unplanned non-operation shall be provided no later than one (1) week after non-operation begins.	O	BLM/CEC	ROD/CEC Approval	PGD	n/a		No Action Unless Event Occurs	
72	COM-14	<p>Written updates to the CPM for non-operational periods, until operation resumes, shall include:</p> <ol style="list-style-type: none"> progress relative to the schedule; developments that delayed or advanced progress or that may delay or advance future progress; any public, agency, or media comments or complaints; and projected date for the resumption of operation. <p>During non-operation, all applicable conditions of certification and reporting requirements remain in effect. If, after one (1) year from the date of the project owner's last report of productive Repair/Restoration Plan work, the facility does not resume operation or does not provide a plan to resume operation, the Executive Director may assign suspended status to the facility and recommend commencement of permanent closure activities.</p>		BLM/CEC	ROD/CEC Approval	PGD	n/a		No Action Unless Event Occurs	
73		<ol style="list-style-type: none"> If the facility has a closure plan, the project owner shall update it and submit it for Energy Commission review and approval. If the facility does not have a closure plan, the project owner shall develop one consistent with the requirements in this Compliance Plan and submit it for Energy Commission review and approval. 		BLM/CEC	ROD/CEC Approval	PGD	n/a		No Action Unless Event Occurs	
74		At least three (3) years prior to initiating a permanent facility closure, the project owner shall submit for Energy Commission review and approval, a Final Closure Plan and Cost Estimate, which includes any long-term, post-closure site maintenance and monitoring.	O	BLM/CEC	ROD/CEC Approval	PGD	2036?		Submittal	If a project owner initiates but then suspends closure activities, and the suspension continues for longer than one (1) year, or subsequently abandons the facility, the
75		If an Energy Commission-approved Final Closure Plan and Cost Estimate is not implemented within one (1) year of its approval date, it shall be updated and re-submitted to the Commission for supplementary review and approval.		BLM/CEC			Need		No Action Unless Event Occurs	
76	COM-15	<p>To assure satisfactory long-term site maintenance and adequate closure for "the whole of a project," the project owner shall submit a Provisional Closure Plan and Cost Estimate for CPM review and approval within sixty (60) days 1 Year after the start of commercial operation. The project owner shall include an updated Provisional Closure Plan and Cost Estimate in every fifth-year ACR for CPM review and approval. The Provisional Closure Plan and Cost Estimate shall consider applicable final closure plan requirements, including interim and long-term, post-closure site maintenance costs, and reflect:</p> <p>****</p> <p>Key Event List Table: One (1) year after initiating commercial operation, the project owner must submit a Provisional Closure Plan and Cost Estimate for permanent closure. Three (3) years prior to closing, the project owner must submit a Final Closure Plan</p>	O	Plans	Every 5 Years	Ongoing	1 yr after Units	N/A	N/A	<p>Per email from Mary Dyas 1/3/17 - Disregard 60 day reference. Due date is 1 year.</p> <ol style="list-style-type: none"> facility closure costs at a time in the facility's projected life span when the mode and scope of facility operation would make permanent closure the most expensive; the use of an independent third party to carry out the permanent closure; and no use of salvage value to offset closure costs.
77	COM-2	Energy Commission staff and delegate agencies shall, upon request to the project owner, be given unrestricted access to the files maintained pursuant to this condition.	CO	BLM/CEC	ROD/CEC Approval	E&C			General	
78		Compliance Record. The project owner shall maintain electronic copies of all project files and submittals on-site, or at an alternative site approved by the CPM, for the operational life and closure of the project.	All	Compliance	N/A	Ongoing	N/A	N/A	N/A	Certification; 2. all amendment petitions and Energy Commission orders;
79		Compliance Verification Submittals. Verification lead times associated with the start of construction or closure may require the project owner to file submittals during the AFC process, particularly if construction is planned to commence shortly after certification. The verification procedures, unlike the conditions, may be modified as necessary by the CPM.	CO	BLM/CEC	ROD/CEC Approval	E&C			General	

Blythe Solar Compliance Matrix 2025

80	COM-3	All reports and plans required by the project's conditions of certification shall be submitted in a searchable electronic format (.pdf, MS Word or Excel, etc.) and include standard formatting elements such as a table of contents, identifying by title and page number, each section, table, graphic, exhibit, or addendum.	CO	Compliance Plans	N/A	Ongoing	N/A	N/A	N/A	All report and/or plan graphics and maps shall be adequately scaled and shall include a key with descriptive labels, directional headings, a bar scale, and the most recent revision date. The cover letter subject line shall identify the project by AFC number, cite the
81		A cover letter from the project owner or an authorized agent is required for all compliance submittals and correspondence pertaining to compliance matters.		Compliance Plans	N/A	Ongoing	N/A	N/A	N/A	
82		The project owner is responsible for the content and delivery of all verification submittals to the CPM, whether the actions required by the verification were satisfied by the project owner or an agent of the project owner. All submittals shall be accompanied by an electronic copy on an electronic storage medium, or by e-mail, as agreed upon by the CPM.		Compliance Plans	N/A	Ongoing	N/A	N/A	N/A	
83	COM-6	During project pre-construction, construction, or closure, the project owner or authorized agent shall submit an electronic searchable version of the MCR within ten (10) business days after the end of each reporting month, unless otherwise specified by the CPM. MCRs shall be clearly identified for the month being reported. The searchable electronic copy may be filed on an electronic storage medium or by e-mail, subject to CPM approval.	CO	BLM/CEC	ROD/CEC Approval	Dudek	Monthly		MCR	The compliance verification submittal condition provides guidance on report production standards. See COM-6 for details on the submittals requirements.
84	COM-7	Annual Compliance Reports. After construction is complete, the project owner shall submit searchable electronic ACRs instead of MCRs. ACRs shall be completed for each year of commercial operation, may be required for a specified period after decommissioning to monitor closure compliance, as specified by the CPM, and are due each year on a date agreed to by the CPM.	O	BLM/CEC	ROD/CEC Approval	PGD, Dudek	ACR		Submittal	See COM-7 for details on the submittals requirements.
85	COM-8	Confidential Information. Any information that the project owner designates as confidential shall be submitted to the Energy Commission's Executive Director with an application for confidentiality, pursuant to Title 20, California Code of Regulations, section 2505 (a).	CO	BLM/CEC	ROD/CEC Approval	E&C	n/a		No Action Unless Event Occurs	
86	COM-9	Annual Energy Facility Compliance Fee. Pursuant to the provisions of section 25806 (b) of the Public Resources Code, the project owner is required to pay an annually adjusted compliance fee.	CO	BLM/CEC	ROD/CEC Approval	Development	Annual		Annual	
87	CUL-1	The project owner shall contribute to a special fund set up by the Energy Commission and/or BLM to finance the completion of the PTNCL Documentation and Possible NRHP Nomination program presented in the Blythe Solar Power Plant (BSPP) Revised Staff Assessment RSA). The amount of the contribution shall be \$35 per acre that the project encloses or otherwise disturbs.	CO	BLM/CEC	ROD/CEC Approval					
88		If a project is not certified, or if a project owner does not build the project, or, if for some other reason deemed acceptable by the CPM, a project owner does not participate in funding the PTNCL documentation and possible NRHP nomination program, the other project owner(s) may consult with the CPM to adjust the scale of the PTNCL documentation and possible NRHP nomination program research activities to match available funding. A project owner that funds the PTNCL documentation and possible NRHP nomination program, and then withdraws, will be able to reclaim their monetary contribution, to be refunded on a prorated basis.	CO	BLM/CEC	ROD/CEC Approval					
89		No later than 10 days after receiving notice of the successful transfer of funds for any installment to the Energy Commission's and/or BLM's special PTNCL fund, the project owner shall submit a copy of the notice to the Energy Commission's Compliance Project Manager (CPM).	CO	BLM/CEC	ROD/CEC Approval					
90	CUL-18	Within 30 days after requesting a suspension of construction activities, the project owner shall submit a draft CRR to the CPM for review and approval.	CO	BLM/CEC	ROD/CEC Approval					
91		Within 180 days after completion of ground disturbance (including landscaping), the project owner shall submit the final CRR to the CPM for review and approval and to the BLM Palm Springs Field Office archaeologist for review and approval. If any reports have previously been sent to the CHRIS, then receipt letters from the CHRIS or other verification: of receipt shall be included in an appendix.	CO	BLM/CEC	ROD/CEC Approval		180		Submittal	
92		Within 10 days after the CPM and the BLM Palm Springs Field Office archaeologist approve the CRR, the project owner shall provide documentation to the CPM confirming that copies of the final CRR have been provided to the SHPO, the CHRIS, the curating institution, if archaeological materials were collected, and to the Tribal Chairpersons of any Native American groups requesting copies of project-related reports.	CO	BLM/CEC	ROD/CEC Approval		210		Submittal	
93	CUL-2	The project owner shall contribute to a special fund set up by the Energy Commission and/or BLM to finance the completion of the Documentation and Possible NRHP Nomination program presented in the BSPP RSA. The amount of the contribution shall be \$25 per acre that the project encloses or otherwise disturbs.	CO	BLM/CEC	ROD/CEC Approval					
94		If a project is not certified, or if a project owner does not build the project, or, if for some other reason deemed acceptable by the CPM, a project owner does not participate in funding the DTCCCL documentation and possible NRHP nomination program, the other project owner(s) may consult with the CPM to adjust the scale of the DTCCCL documentation and possible NRHP nomination program research activities to match available funding. A project owner that funds the DTCCCL documentation and possible NRHP nomination program, and then withdraws, will be able to reclaim their monetary contribution, to be refunded on a prorated basis.	CO	BLM/CEC	ROD/CEC Approval					
95		No later than 10 days after receiving notice of the successful transfer of funds for any installment to the Energy Commission's and/or BLM's special DTCCCL fund, the project owner shall submit a copy of the notice to the CPM.	CO	BLM/CEC	ROD/CEC Approval					
96	CUL-6	4. No longer than 90 days after the end of all construction-related ground disturbance, the project owner shall ensure that the CRS completes the preparation of the National Register of Historic Places and the California Register of Historical Resources nominations for the PQAD and submits the nominations to the State Historic Resources Commission for formal consideration.	CO	BLM/CEC	ROD/CEC Approval					
97		5. No longer than 90 days after the end of all construction-related ground disturbance, the project owner shall ensure that the CRS completes the professional paper and provides the CPM with three copies of the final product of that effort, and prepares, and submits for the approval of the CPM, a public outreach product. Upon the CPM's approval of the latter product, the project owner shall ensure, as appropriate, the product's installation, implementation, or display.	CO	BLM/CEC	ROD/CEC Approval					

Blythe Solar Compliance Matrix 2025

98		6. No longer than 90 days after the end of all construction-related ground disturbance, the project owner shall ensure that the CRS completes the requisite material analyses and prepares and submits, for the approval of the CPM, the final cultural resources report for the Blythe cultural resources data recovery and monitoring activities. The final report shall provide descriptions of the schedule and methods of the data recovery effort, technical descriptions of excavated archaeological features and buried land surfaces that present the highest resolution of technical data that can be derived from the data recovery field notes, plan and, as appropriate, profile drawings and photographs of excavated archaeological features and buried land surfaces, and technical descriptions and appropriate graphics of the stratigraphic contexts of excavated archaeological features and buried land surfaces.	CO	BLM/CEC	ROD/CEC Approval					
99	GEN-1	Once the certificate of occupancy has been issued, the project owner shall inform the CPM at least 30 days prior to any construction, addition, alteration, moving, demolition, repair, or maintenance to be performed on any portion(s) of the completed facility that requires CBO approval for compliance with the above codes. The CPM will then determine if the CBO needs to approve the work.	O	BLM/CEC	ROD/CEC Approval	PGD	n/a		Notification	
100	HAZ-1	The project owner shall provide to the CPM, in the Annual Compliance Report, a list of hazardous materials contained at the facility.	C, O	BLM/CEC	ROD/CEC Approval		Annual		Annual	
101		The project owner shall not use any hazardous materials not listed in Appendix A, below, or in greater quantities or strengths than those identified by chemical name in Appendix A, below, unless approved in advance by the Compliance Project Manager (CPM).	CO	Haz Material	N/A	Ongoing	N/A	N/A	N/A	
102	HAZ-6	At least 30 days prior to the initial receipt of operations-related hazardous materials on site, the project owner shall notify the CPM that a site-specific operations site security plan is available for review and approval. In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. In the annual compliance report, the project owner shall include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.	O	BLM/CEC	ROD/CEC Approval	PGD	4/30/2020	5/13/2016	Notification	CEC has requested we email them that the plan is available on site, instead of emailing as anything sent to them becomes public record. Would defeat the purpose of a site security plan.
103		The project owner shall fully implement the security plans and obtain CPM approval of any substantive modifications to those security plans.	CO	Safety	N/A	Ongoing	N/A	N/A	N/A	
104	PAL-7	The project owner shall ensure preparation of a Paleontologic Resources Report (PRR) by the designated PRS. The PRR shall be prepared following completion of the ground-disturbing activities. The PRR shall include an analysis of the collected fossil materials and related information and submit it to the CPM for review and approval. Within 90 days after completion of ground-disturbing activities, including landscaping, the project owner shall submit the PRR under confidential cover to the CPM.	CO	BLM/CEC	ROD/CEC Approval		90		Submittal	
105	SOIL & WATER 19	The project owner shall ensure that the solar panels, drainage washes that will have solar panels are designed and installed to accommodate storm water scour that may occur as a result of a 100-year, 24-hour storm event. The analysis of the storm event and resulting pylon stability shall be provided within a Pylon Insertion Depth and Solar Panel Stability Report to be completed by the project owner. This analysis shall incorporate results from site-specific geotechnical stability testing, as well as hydrologic and hydraulic storm water modeling performed by the project owner. The modeling shall be completed using methodology and assumptions approved by the CPM.	CO	BLM/CEC	ROD/CEC Approval	E&C?				
106		The project owner shall also develop a Storm Water Damage Monitoring and Response Plan to evaluate potential impacts from storm water, including damage to drainage washes, perimeter fencing, and solar panel supports that fail due to storm water flow or otherwise break and scatter panel debris or other potential pollutants on to the ground surface.	CO	BLM/CEC	ROD/CEC Approval	E&C, Dudek		11/22/2016	Action	
107		The project owner shall retain a copy of SWDMRP plan onsite at all times. The project owner shall prepare an annual summary of the number of solar panels that fail due to damage, cause and extent of the damage, and cleanup and mitigation performed for each damaged solar panels. The annual summary shall also report on the effectiveness of the modified drainage washes against storms, including information on the damage and repair work or associated erosion control elements. The project owner shall submit proposed changes or revisions to the Storm Water Damage Monitoring and Response Plan to the CPM for review and approval.	O	BLM/CEC	ROD/CEC Approval	PGD	Annually		Submittal	
108		The project owner shall reduce impacts caused by large storms by ensuring solar panels, drainage washes that will have solar panels, and perimeter fencing are designed to accommodate the 100-year storm event, establishing ongoing maintenance and inspection of storm water controls, and implementing a response plan to clean up damage and address ongoing issues.	CO	Water	N/A	Ongoing	N/A	N/A	N/A	
109		Inspection, short-term incident response, and long-term design based response may include activities both inside and outside of the project boundaries. For activities outside of the project boundaries the owner shall ensure all appropriate environmental review and approval has been completed before field activities begin.	O	Water	N/A	Ongoing	N/A	N/A	N/A	
110	SOIL & WATER-10	The project owner will prepare both a Provisional Closure Plan and a Final Closure Plan that will meet the requirements of the BLM. One (1) year after initiating commercial operation, the project owner must submit a Provisional Closure Plan and cost estimate for permanent closure to the CPM for review and approval.	O	Water	One Time	Ongoing	10/29/2017			
111		Three (3) years prior to closing, the owner must submit a Final Closure Plan to the CPM for review and approval. The project owner shall amend these documents as necessary, with approval from the CPM, should the facility closure scenario change in the future.	O DM	Water	N/A			11/1/2043		
112	SOIL & WATER-16	The project owner shall conduct a detailed analysis of the contribution of surface water to the PVMGB from the project's groundwater extraction activities at the end of the 30 year operational period.	O	BLM/CEC	ROD/CEC Approval	PGD	In 30 years		Action	Analysis requirements in Soil & Water 16

Blythe Solar
Compliance Matrix 2025

113	SOIL & WATER-2	To mitigate the impact from project pumping, the project owner shall identify and implement offset measures to mitigate the increase in discharge from surface water to groundwater that affects recharge from the Palo Verde Valley Groundwater Basin (USGS) to the Palo Verde Mesa Groundwater Basin (USGS). The project owner shall implement SOIL&WATER-16 to evaluate the change in recharge over the life of the project including any latency effects from project pumping. The offset measures shall consider water conservation projects such as payment for irrigation improvements in Palo Verde Irrigation District, land fallowing, and/or BLM's Tamarisk Removal Program or other proposed mitigation activities acceptable to the CPM.	All	Water	N/A	Ongoing	N/A	N/A	N/A
114		The project owner shall ensure compliance with all county water well standards and County requirements for the life of the wells and shall provide the CPM with two copies each of all monitoring or other reports required for compliance with the County of Riverside water well standards and operation requirements, as well as any changes made to the operation of the well	All	Water	N/A	Ongoing	N/A	N/A	N/A
115	SOIL & WATER-4	Prior to the use of groundwater for construction, the project owner shall install and maintain metering devices as part of the water supply and distribution system to document project water use and to monitor and record, in gallons per day, the total volume(s) of water supplied to the project from this water source. The metering devices shall be operational for the life of the project.	CO	BLM/CEC	ROD/CEC Approval				
116		The project owner shall prepare an annual summary, which shall include daily usage, monthly range and monthly average of daily water usage in gallons per day, and total water used on a monthly and annual basis in acre-feet. For years subsequent to the initial year of operation, the annual summary shall also include the yearly range and yearly average water use by source. For calculating the total water use, the term "year" will correspond to the date established for the annual compliance report submittal.	CO	BLM/CEC	ROD/CEC Approval		1/31/2017		
117		The proposed project's use of groundwater during construction shall not exceed 1,200 af during the 48 months of construction and an annual average of 40 afy during operation.	CO	Water	Annually	Ongoing	N/A	4/10/2019	N/A
118	SOIL & WATER-5	No later than March 31 of each year of construction or 60 days prior to project operation, the project owner shall provide to the CPM for review and approval, documentation showing that any mitigation to private well owners during project construction was satisfied, based on the requirements of the property owner as determined by the CPM.	CO	BLM/CEC	ROD/CEC Approval				
119		During project operation, the project owner shall submit to the CPM, applicable quarterly, semi-annual and annual reports presenting all the data and information required in item C above. Quarterly reports shall be submitted to the CPM 30 days following the end of the quarter. The fourth quarter report shall serve as the annual report and will be provided on January 31 in the following year.	O	Water	Quarterly	Ongoing	N/A	1/1/2019	
120		The project owner shall submit to the CPM all calculations and assumptions made in development of report data and interpretations, calculations, and assumptions used in development of any reports.	CO	Water	N/A		N/A	N/A	
121		After the first five year operational and monitoring period, the project owner shall submit a five-year monitoring report to the CPM that includes all monitoring data collected and a summary of the findings. The CPM will determine if the water level measurements and water quality sampling frequencies should be revised or eliminated.	O	Water	One Time		1/31/2022	N/A	
122	SOIL & WATER-5C	If water levels have been lowered more than five feet below pre-site operational trends, and monitoring data provided by the project owner show these water level changes are different from background trends or other groundwater pumping and are caused by project pumping, then the project owner shall provide mitigation to the impacted well owner(s).		BLM/CEC					
		The project owner shall notify any owners of the impacted wells within one month of the CPM approval of the compensation analysis for increased energy costs.	CO		ROD/CEC Approval				
123		If groundwater monitoring data indicate project pumping has lowered water levels below the top of the well screen, and the well yield is shown to have decreased by 10 percent or more of the pre- project average seasonal yield, compensation shall be provided for the diagnosis and maintenance to treat and remove encrustation from the well screen		BLM/CEC					
124		If mitigation includes monetary compensation, the project owner shall provide documentation to the CPM that compensation payments have been made by March 31 of each year of project operation. Within 30 days after compensation is paid, the project owner shall submit to the CPM a compliance report describing compensation for increased energy costs necessary to comply with the provisions of this Condition		BLM/CEC					
125		On a quarterly basis for the first year of operation and semi-annually thereafter for the following four years, collect water level measurements from any wells identified in the groundwater monitoring program to evaluate operational influence from the project. Quarterly operational parameters (i.e., pumping rate) of the water supply wells shall be monitored as access allows for those wells within the monitoring network. Wells outside the network and their influence on pumping within the network shall be evaluated on a quarterly basis to understand well interference from sources of pumping outside the Project area.	O	Water	Quarterly	Ongoing	N/A	12/27/2018	N/A
126		On an annual basis, perform statistical trend analysis for water levels data and comparison to predicted water level declines due to project pumping. Based on the results of the statistical trend analyses and comparison to predicted water level declines due to project pumping, the project owner shall determine the area where the project pumping has induced a drawdown in the water supply at a level of five feet or more below the baseline trend.	CO	Water	Annual	Ongoing	N/A	N/A	N/A
127		During the life of the project, the project owner shall provide to the CPM all monitoring reports, complaints, studies and other relevant data within 10 days of being received by the project owner.	CO	Water	N/A	Ongoing	N/A	N/A	N/A
128		The project owner shall submit to the CPM for review and approval, no later than 30 days after approval of drawdown analysis, the documentation showing which well owners must be compensated for increased energy costs and that the proposed amount is sufficient compensation to comply with the provisions of this Condition.	CO	BLM/CEC	ROD/CEC Approval				

Blythe Solar
Compliance Matrix 2025

129	SOIL & WATER-6	Compensation provided on an annual basis shall be calculated prospectively for each year by estimating energy costs that will be incurred to provide the additional lift required as a result of the project. With the permission of the impacted well owner, the project owner shall provide energy meters for each well or well field affected by the project. The impacted well owner to receive compensation must provide documentation of energy consumption in the form of meter readings or other verification of fuel consumption. For each year after the first year of operation, the project owner shall include an adjustment for any deviations between projected and actual energy costs for the previous calendar year.	CO	Water	Annually	Ongoing	N/A	N/A	N/A
130		The project owner shall submit to the CPM all calculations, along with any letters signed by the well owners indicating agreement with the calculations, and the name and phone numbers of those well owners that do not agree with the calculations. Compensation payments shall be made by March 31 of each year of project operation. Within 30 days after compensation is paid, the project owner shall submit to the CPM a compliance report describing compensation for increased energy costs necessary to comply with the provisions of this Condition.		Water			3/5/3052		
131	SOIL & WATER-7	The project owner shall comply with the requirements specified in Appendices B, C, and D. These requirements relate to discharges, or potential discharges, of waste that could affect the quality of waters of the state, and were developed in consultation with staff of the State Water Resources Control Board and/or the applicable California Regional Water Quality Control Board (hereafter "Water Boards"). It is the Commission's intent that these requirements be enforceable by both the Commission and the Water Boards. In furtherance of that objective, the Commission hereby delegates the enforcement of these requirements, and associated monitoring, inspection and annual fee collection authority, to the Water Boards. Accordingly, the Commission and the Water Board shall confer with each other and coordinate, as needed, in the enforcement of the requirements. The project owner shall pay the annual waste discharge permit fee associated with this facility to the Water Boards. In addition, the Water Boards may "prescribe" these requirements as waste discharge requirements pursuant to Water Code Section 13263 solely for the purposes of enforcement, monitoring, inspection, and the assessment of annual fees, consistent with Public Resources Code Section 25531, subdivision (c)	CO	BLM/CEC	ROD/CEC Approval				
132		No later than 60 days prior to any wastewater or storm water discharge, the project owner shall provide documentation to the CPM, with copies to the CRBRWQCB, demonstrating compliance with the WDRs established in Appendices B, C, and D. Any changes to the design, construction, or operation of the evaporation basins or storm water system shall be requested in writing to the CPM, with copies to the CRBRWQCB, and approved by the CPM, in consultation with the CRBRWQCB, prior to initiation of any changes. The project owner shall provide to the CPM, with copies to the CRBRWQCB, all monitoring reports required by the WDRs, and fully explain any violations, exceedances, enforcement actions, or corrective actions related to construction or operation of the evaporation basins, or storm water system.	CO	BLM/CEC	ROD/CEC Approval		#REF!		
133	SOIL & WATER-8	The project owner shall comply with the requirements of the County of Riverside Ordinance Code Title 8, Chapter 8.124 and the California Plumbing Code (California Code of Regulations Title 24, Part 5) regarding sanitary waste disposal facilities such as septic systems and leach fields. The septic system and leach fields shall be designed, operated, and maintained in a manner that ensures no deleterious impact to groundwater or surface water. Compliance shall include an engineering report on the septic system and leach field design, operation, maintenance, and loading impact to groundwater. If it is determined based on the engineering report that groundwater may be impacted, the project owner shall include a groundwater quality monitoring program. This program can utilize monitoring wells (if appropriate) used as part of groundwater monitoring in Condition of Certification SOIL&WATER-7. The engineering report will specify the proposed groundwater monitoring program (if required), constituents of concern, monitoring frequency and other elements as needed as part of any groundwater monitoring program.	CO	BLM/CEC	ROD/CEC Approval				
134		The project owner shall submit all necessary information and the appropriate fee to the County of Riverside and the CRBRWQCB to ensure that the project has complied with county and state sanitary waste disposal facilities requirements. Written assessments prepared by the County of Riverside and the CRBRWQCB regarding the project's compliance with these requirements must be submitted to the CPM for review and approval 30 days prior to the start of power plant operation.	CO	BLM/CEC	ROD/CEC Approval		#REF!		
135	SOIL & WATER-9	The project owner shall file an annual "Notice of Extraction and Diversion of Water" with the SWRCB in accordance with Water Code Sections 4999 et. seq. The project owner shall include a copy of the filing in the annual compliance report.	CO	BLM/CEC	ROD/CEC Approval		Annual	Annual	
136		The project is subject to the requirement of Water Code Sections 4999 et. seq. for reporting of groundwater production in excess of 25 acre feet per year.	CO	Water	Annually	Ongoing	N/A	N/A	N/A
137	SURFACE IMPOUNDMENT	1. Estimated volume of solid/liquid in holding pond ft ³ Monthly semiannual 2. Measurement of freeboard ft Monthly semiannual 3. Volume of solids removed and shipped to off site waste management facility tons Monthly semiannual	O	BLM/CEC	ROD/CEC Approval				N/A
138	TLSN-2	All reports of line-related complaints shall be summarized for the project-related lines and included during the first five years of plant operation in the Annual Compliance Report.	O	BLM/CEC	ROD/CEC Approval	PGD	Annually	Annually	
139	TLSN-4	During the first five years of plant operation, the project owner shall provide a summary of inspection results and any fire prevention activities carried out along the right-of-way and provide such summaries in the Annual Compliance Report.	O	BLM/CEC	ROD/CEC Approval	PGD, Dudek	Annually	Annually	
140		The project owner shall ensure that the rights-of-way of the proposed transmission line are kept free of combustible material, as required under the provisions of section 4292 of the Public Resources Code and section 1250 of Title 14 of the California Code of Regulations.	O	Transmission	N/A	Ongoing	N/A	N/A	N/A
141	TLSN-5	The project owner shall ensure that all permanent metallic objects within the right-of-way of the project-related lines are grounded according to industry standards regardless of ownership.	CO	BLM/CEC	ROD/CEC Approval				
142	TRANS-10	: Within five business days of receiving a glare complaint, the project owner shall file with the City of Blythe Development Services Department, the Riverside County Planning Department, and the CPM a copy of the Glare	CO	BLM/CEC	ROD/CEC Approval				
143	TRANS-3	In addition, the project owner shall retain copies of these permits and supporting documentation in its compliance file for at least six months after the start of commercial operation.	CO	Transportation	N/A	Ongoing	N/A	N/A	N/A
144	TRANS-4	In the monthly compliance reports (MCRs), the project owner shall submit copies of permits received during the reporting period. In addition, the project owner shall retain copies of these permits and supporting documentation in	CO	Transportation	N/A	Ongoing	N/A	N/A	N/A

Blythe Solar
Compliance Matrix 2025

145	TSE-7	The project owner shall be responsible for the inspection of the transmission facilities during and after project construction, and any subsequent CPM and CBO approved changes thereto, to ensure conformance with: CPUC GO-95 or NESC; Title 8 CCR; Articles 35, 36, and 37 of the High Voltage Electric Safety Orders; applicable interconnection standards; NEC; and related industry standards. In case of nonconformance, the project owner shall inform the CPM and CBO in writing within 10 days of discovering such nonconformance and describe the corrective actions to be taken.	CO	BLM/CEC	ROD/CEC Approval					
146	TSE-7	Within 60 days after first synchronization of the project, the project owner shall transmit to the CPM and CBO: "As built" engineering description(s) and one-line drawings of the electrical portion of the facilities signed and sealed by the registered electrical engineer in responsible charge. A statement attesting to conformance with CPUC GO-95 or NESC; Title 8 CCR.; Articles 35, 36, and 37 of the High Voltage Electric Safety Orders; applicable interconnection standards; NEC; and related industry standards.	CO	BLM/CEC	ROD/CEC Approval					
147	VIS-3	Within 48 hours of receiving a lighting complaint, the project owner shall provide the CPM with a complaint resolution form report as specified in the Compliance General Conditions including a proposal to resolve the complaint, and a schedule for implementation. The project owner shall notify the CPM within 48 hours after completing implementation of the proposal. A copy of the complaint resolution form report shall be submitted to the CPM within 30 days.	CO	BLM/CEC	ROD/CEC Approval					
148	VIS-4	To the extent possible, the project owner will use proper design fundamentals to reduce the visual contrast to the characteristic landscape. These include proper siting and location; reduction of visibility; repetition of form, line, color (see VIS-1) and texture of the landscape; and reduction of unnecessary disturbance. Design strategies to address these fundamentals will be based on the following factors:	CO	BLM/CEC	ROD/CEC Approval					
149	WASTE-10	The project owner shall ensure that all non-hazardous, non-recyclable, and non-reusable construction and operation waste is not diverted to Desert Center Landfill or Mecca II Landfill.	All	Waste	N/A	Ongoing	N/A	N/A	N/A	
150	WASTE-5	The project owner shall obtain a hazardous waste generator identification number from the United States Environmental Protection Agency (USEPA) prior to generating any hazardous waste during project construction and operations.	CO	Waste	One Time N/A	Ongoing	N/A	N/A	N/A	
151		The project owner shall keep a copy of the identification number on file at the project site and provide documentation of the hazardous waste generation and notification and receipt of the number to the CPM in the next scheduled Monthly Compliance Report after receipt of the number. Submittal of the notification and issued number documentation to the CPM is only needed once unless there is a change in ownership, operation, waste generation, or waste characteristics that requires a new notification to USEPA. Documentation of any new or revised hazardous waste generation notifications or changes in identification number shall be provided to the CPM in the next scheduled compliance report.	CO	Waste	N/A	Ongoing	N/A	N/A	N/A	
152	WASTE-7	The project owner shall also document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year, provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan, and update the Operation Waste Management Plan as necessary to address current waste generation and management practices.	O	BLM/CEC	ROD/CEC Approval	PGD, Dudek	Annually		Annually	
153	WASTE-9	The project owner shall ensure that all accidental spills or unauthorized releases of hazardous substances, hazardous materials, and hazardous waste are documented and remediated, and that wastes generated from accidental spills and unauthorized releases are properly managed and disposed of in accordance with all applicable federal, state, and local requirements. For the purpose of this Condition of Certification, "release" shall have the definition in Title 40 of the Code of Federal Regulations, Part 302.3.	All	Waste	N/A	Ongoing	N/A	N/A	N/A	
154		The project owner shall document management of all accidental spills and unauthorized releases of hazardous substances, hazardous materials, and hazardous wastes that occur on the project property or related linear facilities.		Waste						
155	WORKERS SAFETY-10	The project owner shall report to the CPM within 24 hours of any incidence of heat illness (heat stress, exhaustion, stroke, or prostration) occurring in any worker on-site and shall report to the CPM the incidence of any confirmed case of Valley Fever in any worker on the site within 24 hours of receipt of medical diagnosis.	C, O	BLM/CEC	ROD/CEC Approval					
156		The project owner shall provide reports of heat-related and Valley Fever incidences in any worker on the site via telephone call or e-mail to the CPM within 24 hours of a heat-related occurrence or confirmed diagnosis of a case of Valley Fever, and shall include such reports in the Monthly Compliance Report during construction and the Annual Compliance Report during operation.		BLM/CEC						
157	WORKERS SAFETY-5	The project owner shall ensure that a portable automatic external defibrillator (AED) is located on site during construction and operations and shall implement a program to ensure that workers are properly trained in its use and that the equipment is properly maintained and functioning at all times.	CO	Safety	N/A	Ongoing	N/A	N/A	N/A	
158	WORKERS SAFETY-9	During operation, the project owner shall provide proof in the Annual Compliance Report that the required inspection fees have been paid to the fire department.	O	BLM/CEC	ROD/CEC Approval	PGD	1/31/2017		Action	

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Appendix B

Hazardous Materials Inventory (CERS filing)

Blythe Solar, LLC (CERSID: 10728847)**Facility Information** **Submitted Feb 28, 2026**

Submitted on 2/28/2026 8:56:24 AM by *Cynthia Keller* of Blythe Solar, LLC (Blythe, CA)

- Business Activities
- Business Owner/Operator Identification

Hazardous Materials Inventory **Submitted Feb 28, 2026**

Submitted on 2/28/2026 8:56:24 AM by *Cynthia Keller* of Blythe Solar, LLC (Blythe, CA)

- Hazardous Material Inventory (12)
- Site Map (Official Use Only)
 - *Annotated Site Map (Official Use Only)* (Adobe PDF, 540KB)

Emergency Response and Training Plans **Submitted Feb 28, 2026**

Submitted on 2/28/2026 8:56:24 AM by *Cynthia Keller* of Blythe Solar, LLC (Blythe, CA)

- Emergency Response/Contingency Plan
 - *Emergency Response/Contingency Plan* (Adobe PDF, 1065KB)
- Employee Training Plan
 - *Employee Training Plan* (Adobe PDF, 360KB)

Site Identification**Blythe Solar, LLC**4000 Dracker Dr
Blythe, CA 92225County
RiversideCERS ID
10728847EPA ID Number
CAR000292581**Submittal Status**Submitted on 2/28/2026 by *Cynthia Keller* of Blythe Solar, LLC (Blythe, CA)**Hazardous Materials**

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive inventory local reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?

Yes**Underground Storage Tank(s) (UST)**

Does your facility own or operate underground storage tanks?

No**Hazardous Waste**

Is your facility a Hazardous Waste Generator?

Yes

Does your facility treat hazardous waste on-site?

No

Is your facility's treatment subject to financial assurance requirements (for Permit by Rule and Conditional Authorization)?

No

Does your facility consolidate hazardous waste generated at a remote site?

No

Does your facility need to report the closure/removal of a tank that was classified as hazardous waste and cleaned on-site?

No

Does your facility generate in any single calendar month 1,000 kilograms (kg) (2,200 pounds) or more of federal RCRA hazardous waste, or generate in any single calendar month greater than 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate more than 100 kg (220 pounds) of spill cleanup materials contaminated with RCRA acute hazardous waste.

No

Is your facility a Household Hazardous Waste (HHW) Collection site?

No**Excluded and/or Exempted Materials**

Does your facility recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC 25143.2)?

No**Aboveground Petroleum Storage**

Does your facility own or operate aboveground petroleum storage tanks or containers AND:

* have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR

* have one or more petroleum tanks in an underground area?

No**Regulated Substances**

Does your facility have Regulated Substances stored onsite in quantities greater than the threshold quantities established by the California Accidental Release prevention Program (CalARP)?

No**Additional Information**

No additional comments provided.

Facility/Site		CERS ID
Blythe Solar, LLC 4000 Dracker Dr Blythe, CA 92225		10728847

Submittal Status
 Submitted on 2/28/2026 by *Cynthia Keller* of Blythe Solar, LLC (Blythe, CA)

Identification			Beginning Date	Ending Date
Blythe Solar Energy Center, LLC			Dun & Bradstreet	SIC Code
Operator Phone (760) 922-7816	Business Phone (760) 922-7820	Business Fax		Primary NAICS

Facility/Site Mailing Address
 PO Box 2370
 Blythe, CA 92226

Primary Emergency Contact
 Joshua Heveron
 Title
 Regional Manager II
 Business Phone (928) 413-2196 24-Hour Phone (760) 774-7913 Pager Number

Owner
 Blythe Solar Energy Center, LLC
 (760) 922-7820
 4000 Dracker Dr
 Blythe, CA 92225

Secondary Emergency Contact
 Gil Makabenta
 Title
 Production Manager
 Business Phone (760) 238-6921 24-Hour Phone (702) 280-1559 Pager Number

Billing Contact
 Cynthia Keller
 (928) 302-0402 cynthia.keller@nee.com
 PO Box 2370
 Blythe, CA 92226

Environmental Contact
 Cynthia Keller
 (928) 302-0402 Cynthia.Keller@nee.com
 PO Box 2370
 Blythe, CA 92226

Name of Signer Cynthia Keller	Signer Title PGD Renewables Environmental Leader	Document Preparer Cynthia Keller
Additional Information		

Locally-collected Fields
 Some or all of the following fields may be required by your local regulator(s).

<p>Property Owner Bureau of Land Management (BLM) Phone Mailing Address 1201 Bird Center Drive Palm City, CA 92262</p>	<p>Assessor Parcel Number (APN) Number of Employees Facility ID FA0049072</p>
--	--

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location BESS	CERS ID 10728847
Facility Name Blythe Solar, LLC 4000 Dracker Dr, Blythe 92225		Facility ID FA0049072
		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	Sulfur Hexafluoride	Cu. Feet	750	5.6	750		- Physical Gas - Under Pressure - Health Simple - Asphyxiant			
	<u>CAS No</u> 2551-62-4	<u>State</u> Gas	<u>Storage Container</u> Other		<u>Pressure</u> > Ambient	<u>Waste Code</u>				
		<u>Type</u> Pure			<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location Blythe BESS	CERS ID 10728847
Facility Name Blythe Solar, LLC 4000 Dracker Dr, Blythe 92225		Facility ID FA0049072
		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 9 - Misc. Hazardous Materials	Lithium Ion Batteries <u>CAS No</u>	Pounds	25962240	280	25962240	0	- Health Skin Corrosion	Cobalt lithium manganese nickel	40%	182442-95-1
		<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Irritation	Graphite	25%	7782-42-5
		<u>Solid</u>	<u>Other</u>		<u>Ambient</u>			1-methyl-2-pyrrolidone	20%	872-50-4
		<u>Type</u>	<u>Temperature</u>		<u>Ambient</u>			Copper	10%	744-50-8
		Mixture	Days on Site: 365				Aluminium	5%	7429-90-5	

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location Blythe BESS, containment pad near substation	CERS ID 10728847
Facility Name Blythe Solar, LLC 4000 Dracker Dr, Blythe 92225		Facility ID FA0049072
		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 9 - Misc. Hazardous Materials	Ethylene Glycol	Gallons	8070	55	8070	0	- Health Acute Toxicity	Ethylene Glycol	100%	107-21-1
Combustible Liquid, Class III-B	<u>CAS No</u> 107-21-1	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressure</u> Ambient	<u>Waste Code</u>	- Health Specific Target Organ Toxicity			
		<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location Solar Field	CERS ID 10728847
Facility Name Blythe Solar, LLC 4000 Dracker Dr, Blythe 92225		Facility ID FA0049072
		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
Combustible Liquid, Class III-B	Mineral Oil	Gallons	11172	798	11172	0	- Physical Flammable			
	<u>CAS No</u> 8042-47-5	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressure</u> Ambient	<u>Waste Code</u>				
		<u>Type</u> Mixture	Days on Site: 365		<u>Temperature</u> Ambient					
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	Lead Acid Batteries	Gallons	96	1.04	96		- Physical Flammable - Physical Corrosive To Metal - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	Sulfuric Acid	40%	✓ 7664-93-9
	<u>CAS No</u>	<u>State</u> Liquid	<u>Storage Container</u> Other		<u>Pressure</u> Ambient	<u>Waste Code</u> 792				
		<u>Type</u> Mixture	Days on Site: 365		<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location Solar Field	CERS ID 10728847
Facility Name Blythe Solar, LLC 4000 Dracker Dr, Blythe 92225		Facility ID FA0049072
		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% WL	EHS CAS No.
DOT: 2.2 - Nonflammable Gases	Sulfur Hexafluoride	Pounds	140	20	140		- Physical Gas Under Pressure - Health Simple Asphyxiant			
	<u>CAS No</u> 2551-62-4	<u>State</u> Gas	<u>Storage Container</u> Other		<u>Pressure</u> > Ambient	<u>Waste Code</u>				
		<u>Type</u> Pure	Days on Site: 365		<u>Temperature</u> Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location Solar Field, Substation	CERS ID 10728847
Facility Name Blythe Solar, LLC		Facility ID FA0049072
4000 Dracker Dr, Blythe 92225		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt.	EHS CAS No.
DOT: 9 - Misc. Hazardous Materials	Ethylene Glycol - (Antifrogen Inverter Coolant)	Gallons	7385	55	7385		- Health			
		<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Carcinogenicity			
		Liquid	Other		Ambient		- Health Acute			
		<u>Type</u>			<u>Temperature</u>		Toxicity			
	CAS No 107-21-1	Mixture	Days on Site: 365		Ambient		- Health Serious			
							Eye Damage Eye Irritation			
Combustible Liquid, Class III-B	FR3 / Vegetable Oil	Gallons	90660	740	90660	0	- Physical	Vegetable Oil	99%	8001-22-7
		<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable			
		Liquid	Other		Ambient					
		<u>Type</u>			<u>Temperature</u>					
	CAS No 8001-22-7	Mixture	Days on Site: 365		Ambient					

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location	CERS ID 10728847
Facility Name Blythe Solar, LLC	Substation	Facility ID FA0049072
4000 Dracker Dr, Blythe 92225		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt.	EHS CAS No.
Combustible Liquid, Class III-B	Mineral Oil	Gallons	42548	11350	42548		- Physical			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable			
	8042-47-5	Liquid	Other		Ambient					
		<u>Type</u>			<u>Temperature</u>					
		Mixture	Days on Site: 365		Ambient					
DOT: 2.2 - Nonflammable Gases	Sulfur Hexafluoride - SF6	Pounds	1393	127	1393	0	- Physical Gas			
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Under Pressure			
	2551-62-4	Gas	Other		> Ambient					
		<u>Type</u>			<u>Temperature</u>					
		Pure	Days on Site: 365		Ambient					
DOT: 8 - Corrosives (Liquids and Solids)	Lead Acid Batteries	Gallons	178	3.2	178		- Physical	Sulfuric Acid	40%	✓ 7664-93-9
	<u>CAS No</u>	<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>	<u>Waste Code</u>	Flammable			
		Liquid	Other		Ambient	792	- Physical			
		<u>Type</u>			<u>Temperature</u>		Corrosive To			
Corrosive		Mixture	Days on Site: 365		Ambient		Metal			
							- Health Acute			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Blythe Solar, LLC	Chemical Location Substation Area BESS	CERS ID 10728847
Facility Name Blythe Solar, LLC		Facility ID FA0049072
4000 Dracker Dr, Blythe 92225		Status Submitted on 2/28/2026 8:56 AM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 9 - Misc. Hazardous Materials	Lithium Ion Battery	Pounds	4112000	800	4112000		- Physical	Cobalt lithium manganese nickel oxide	40%	182442-95-1
		<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>		Corrosive To	Graphite	25%	7782-42-5
		<u>Solid</u>	<u>Other</u>		<u>Ambient</u>	<u>Waste Code</u>	Metal	1-methyl-2-pyrrolidone	20%	872-50-4
		<u>Type</u>			<u>Temperature</u>			Copper	10%	7440-50-8
		Mixture	Days on Site: 365					Aluminium	5%	7429-90-5

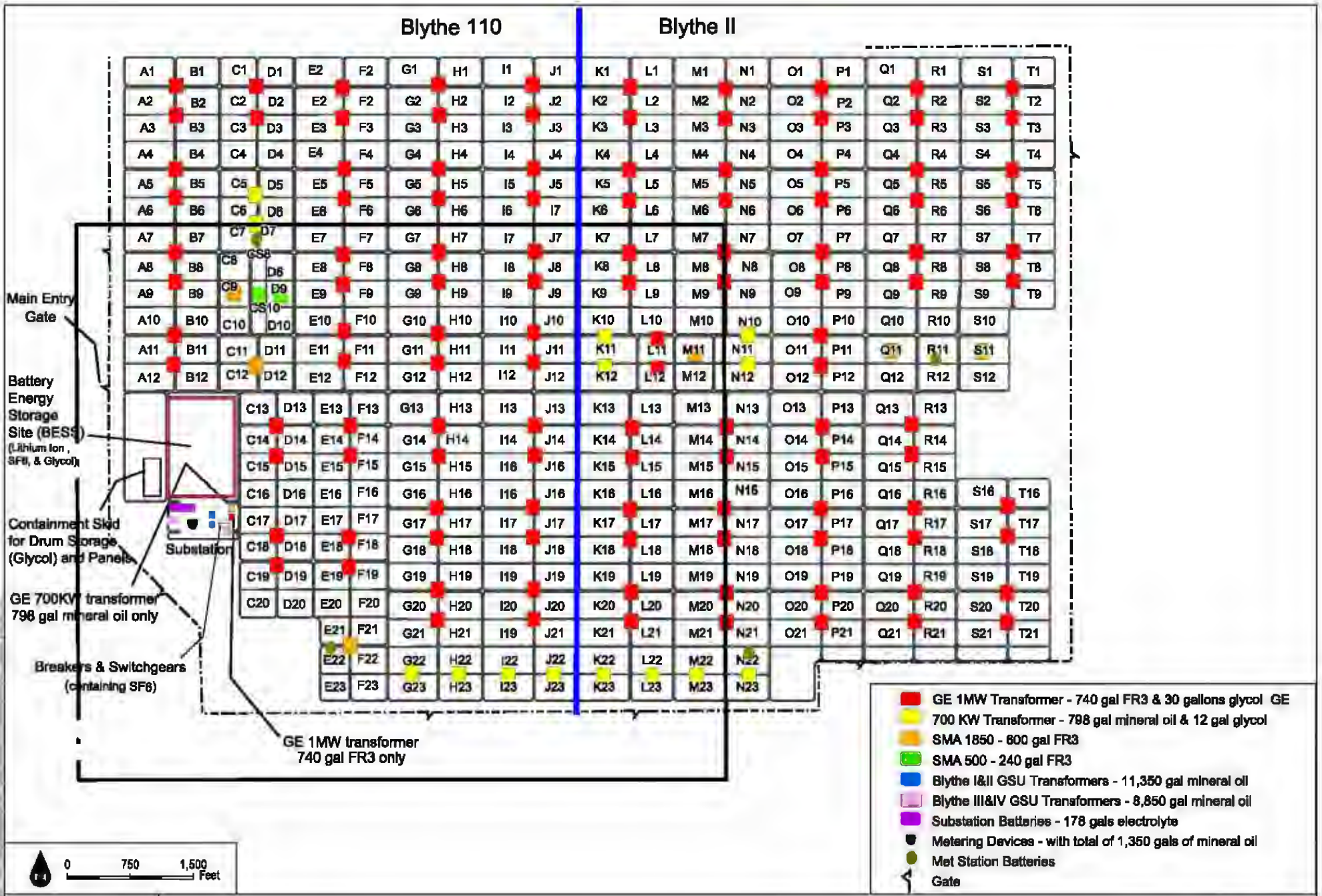


FIGURE 2
Blythe Substation, BESS, and Blythe 110 & II Solar Field - Site Map

POWER GENERATION DIVISION	Process Category: Regulatory Process: Emergency Management	DOC #: SMS 237		
	Blythe, McCoy Solar, Arlington Emergency Action Plan	EFFECTIVE: 12/19/2025	REV #: 20	PAGE 1 of 36

TABLE OF CONTENTS

1.0 DOCUMENT STORAGE AND INFORMATION 2

2.0 REVISION HISTORY 2

3.0 PURPOSE AND SCOPE..... 2

4.0 REFERENCES AND COMMITMENTS 3

5.0 DEFINITIONS 3

6.0 PREREQUISITES AND INITIAL CONDITIONS..... 3

7.0 RECORDS 3

8.0 PROCEDURE 4

APPENDIX 1 NATURAL DISASTER / SEVERE WEATHER EVENT 10

APPENDIX 2 FIRE EVENT RESPONSE 12

APPENDIX 3 PHYSICAL SECURITY EVENT 17

APPENDIX 4 CYBER SECURITY EVENT 21

APPENDIX 5 CAPACITY / TRANSMISSION EVENT 23

APPENDIX 6 ENVIRONMENTAL EVENT 24

APPENDIX 7 GAS PIPELINE EVENT 26

APPENDIX 8 OIL PIPELINE EVENT 27

APPENDIX 9 PANDEMIC EVENT 28

APPENDIX 10 IMMEDIATE SITE EVACUATION PROCEDURE..... 31

APPENDIX 11 DELAYED SITE EVACUATION PROCEDURE..... 33

APPENDIX 12 DESIGNATED EGRESS ROUTES & MUSTER AREAS FOR EVACUATIONS 35

APPENDIX 13 PERSONNEL INJURIES AND SERIOUS HEALTH CONDITIONS 36

1.0 DOCUMENT STORAGE AND INFORMATION

1.1. This Blythe, McCoy, Arlington Emergency Action Plan is stored in the OpModel.

2.0 REVISION HISTORY

Rev #	Revision Description	Approved By Position / Title	Effective Date
12	Remove Texas reference	Jasmin Pinales ERT	6/25/2021
13	Added Visitors Log link in Appendix 9. Pandemic Section	Jasmin Pinales – Emergency Preparedness Team Associate	7/23/2021
14	Update to the appendix 3 “Physical Security Event”.	Jasmin Pinales – Emergency Preparedness Team Associate	11/8/2021
15	2022 Annual Update	Gil Makabenta – Regional Manager II	5/3/2022
16	Updated Physical Security Event Section with new links to Suspicious Substance Guidelines	Lauren Stoube – Emergency Response Team	8/2/2022
17	Annual EAP Update 2023	Josh Heveron – Regional Manager II	4/28/2025
18	Update contact information	Maria E. Lopez – Sr. PGD Business Services Coordinator	08/25/2025
19	Update contact information	Cynthia Keller – PGD Renewables Environmental Leader	12/16/2025
20	Update contact information	Cynthia Keller – PGD Renewables Environmental Leader	12/19/2025

3.0 PURPOSE AND SCOPE

3.1. The purpose of this Emergency Action Plan is to establish the planned response actions that will be taken by personnel at the Blythe, McCoy, Arlington including its battery storage area if applicable in the event of an emergency situation. These actions are intended to minimize health risks to plant personnel and people in the surrounding community, as well as minimize adverse impacts to the environment.

3.2. This plan serves as guidance intended to be a “living” document such that revisions over time, based on experiences, will continue to increase the speed of identification of threats and decrease response time. This plan applies to all employees, contractors, vendors and visitors performing work at NextEra Energy Resources facilities in the United States and Canada.

Note: Each plant/site will maintain a sign in / sign out list for visitors and contractors. This is critical so that in the event of an emergency, the plant will be able to accurately determine if all personnel are accounted for. All employees, contractors and visitors should have a picture ID so in the event of an accident or illness, the identity of the injured can quickly be determined (Site management may elect to require names on hard hats in place of the picture ID).

4.0 REFERENCES AND COMMITMENTS

1. [OSHA 29 CFR 1910.38](#) (Emergency Action Plans)
2. [OSHA 29 CFR 1910](#) Appendix to subpart E
3. [PGD Hurricane Management](#) ("White Paper")
4. [SMS 247](#) - Severe Weather Guidelines
5. [SMS 222](#) – Fire Protection Plan Procedure
6. [SMS 209](#) - Health and Safety Inspections
7. [SMS 214](#) - Personal Protective Equipment (PPE)
8. [NEE-SAF-1610 Electric Shock](#)
9. [Corporate Security - Drone](#)
10. [Blythe, McCoy and Arlington First Responder Orientation Battery Storage](#)
11. [Blythe, McCoy and Arlington BESS Fire Off Normal Response](#)
12. [Wildfire Mitigation Plan](#)

5.0 DEFINITIONS

- 5.1. AED – Automated External Defibrillator
- 5.2. CPR – Cardiopulmonary Resuscitation
- 5.3. EAP – Emergency Action Plan
- 5.4. FCC– Fleet Control Center
- 5.5. FCC RE – Fleet Control Center Reliability Engineer
- 5.6. DG – Distributed Generation
- 5.7. O&M – Operations and Maintenance
- 5.8. OSHA – Occupational Safety and Health Administration
- 5.9. PGD – Power Generation Division
- 5.10. PPE – Personal Protective Equipment
- 5.11. ROCC – Renewable Operations Control Center
- 5.12. SMS – Safety Management System

**Who to contact based on technology

Technology	Contact	Office Phone
Thermal Solar		
Wind	ROCC	(561) 694-3636
PV Solar		
DG		
Battery Storage		

6.0 PREREQUISITES AND INITIAL CONDITIONS

- 6.1. Power Generation Division requires the use of Personal Protective Equipment (PPE). [SMS 214](#) provide a standardized method to define requirements for PPE. The requirements for PPE are dictated based upon the expected hazards of the work. During emergencies, prudent judgment is required as conditions that may pose a risk to safety may be amplified by the nature of the event. Teammates are expected to STOP and evaluate risks associated with the situation to ensure mitigation of safety hazard to self and others in the vicinity. PPE Hazard Assessment Forms should be used as part of emergency drills to help assess the need for additional special protection during emergency situations.

7.0 RECORDS

- 7.1. Paper copies of this Emergency Action Plan shall be maintained locally on site easily accessible to all at normally occupied locations:

1. The McCoy Operations and Maintenance Building
2. The Black Creek Substation Control Building
3. The Dracker Substation Control Building
4. The Sun Catcher Substation Control Building

7.2. An electronic copy of this plan shall also be accessible on the facility's LAN and in the PGD OpModel.

7.3. This Emergency Action Plan shall be reviewed upon implementation, whenever revisions are made, and at least annually by the Site Emergency Primary or Alternate Facility Coordinator.

8.0 PROCEDURE

8.1. Statement of Compliance

1. This Emergency Action Plan was prepared by Blythe, McCoy Solar and Arlington.
2. Thus, I hereby state that the Blythe, McCoy and Arlington sites has evaluated the requirements of all applicable State and Federal Laws and recognize that this Plan has been prepared in accordance with the requirements therein.

Name: Josh Heveron

Signature: 

Title: Regional Manager II

8.2. Designation Of Facility Emergency Coordinators

3. It will be site/plant policy that the Facility Representative (as formally designated to the California State Emergency Response Commission in the facility's 40 CFR 355.30(b) notification letter) will be known as the "Facility Emergency Coordinator" for the purposes of defining roles in this Emergency Action Plan.
4. Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

Primary Facility Emergency Coordinator:

Josh Heveron Regional Solar Site Mgr & ES II

Austin Nugent Regional Solar Site Mgr & ES II

Alternate Facility Emergency Coordinator:

Gil Makabenta Regional Solar Site Mgr & ES I

Cynthia Keller PGD Renewable Environmental Leader

5. Personnel who may be contacted for further information or explanation of duties under this plan are as follows:

Michael Masaitis Regional GM Solar & Energy Storage

8.3. Training

1. All NextEra Energy Resources employees at the site shall receive training on this Emergency Action Plan whenever it is modified or on an annual basis.
2. Employees shall also be trained when this Plan is initially implemented.
3. If the facility has an alarm system, each plant employee, visitor and contractor shall understand the types of local plant alarms and what they are expected to do in the event of each alarm. The plant safety team must assure that the alarms are audible at all plant buildings and locations.
4. Contractors and visitors who enter operating areas of the facility will be informed of site alarms, muster area and evacuation procedures before they enter the facility for the first time, and at least annually thereafter.
5. A listing of contractors with current training on this Emergency Action Plan will be maintained at the facility for reference purposes.

8.4. Facility Location Information for Outside Emergency Responders

1. The Blythe Solar, LLC & McCoy Solar, LLC/Arlington Solar, LLC is located at 4000 Dracker Drive and 1990 Dracker Drive respectively.
2. Outside responders can gain access to the facility from the main entrance at the end of Dracker Drive. Access to the Blythe facility will be through the east main gate off Dracker Drive. Arlington is located inside of the McCoy fence.
3. The entrance road is Dracker Drive, Blythe CA. Blythe and McCoy share a fence to the south of McCoy Solar facility and to the north of the Blythe Solar facility.

8.5. Fire Responder Information

1. Riverside County Fire Dept. Station 45
2. 17280 W Hobsonway, Blythe CA 92225 (760) 921-7825
3. Distance from the site (12 miles) / Distance from the site (20 min)
4. Regular (Fully manned 24/7)

8.6. General Emergency Procedure

1. This Plan was developed for the following plausible contingencies that could transpire at the facility:
 - a. Natural Disaster /Severe Weather Event (APPENDIX 1)
 - b. Fire Response Event (APPENDIX 2)
 - c. Physical Security Event (APPENDIX 3)
 - d. Cyber Security Event (APPENDIX 4)
 - e. Capacity/Transmission Event (APPENDIX 5)
 - f. Environmental Event (APPENDIX 6)
 - g. Gas Pipeline Event (APPENDIX 7)
 - h. Oil Pipeline Event (APPENDIX 8)

- i. Pandemic Event (APPENDIX 9)
 - j. Immediate Site Evacuation Procedure (APPENDIX 10)
 - k. Delayed Site Evacuation Procedure (APPENDIX 11)
 - l. Designated Egress Routes & Muster Areas for Evacuations (APPENDIX 12)
 - m. Personnel Injuries and Serious Health Conditions (APPENDIX 13)
2. It shall be the responsibility of the site leader to assess a developing emergency situation and initiate the appropriate actions in this plan to protect personnel, the surrounding environment, and plant equipment from adverse damages.
3. In the event of an emergency where personnel shall be protected, the following actions will be immediately performed:
- a. Contact 911 immediately.
 - b. Ensure that the following are also contacted:

Title	Name	Office Phone	Cell Phone	Home Phone
Regional GM Solar & Energy Storage	Michael Masaitis	N/A	(352)530-6243	N/A
Regional Solar Site Mgr & ES I	Gil Makabenta	(760) 238-6921	(702) 280-1559	N/A
Regional Solar Site Mgr & ES II	Josh Heveron	(760) 922-7823	(928) 412-2196	N/A
Regional Solar Site Mgr & ES II	Austin Nugent	N/A	(951) 760-2380	N/A
California Energy Commission Compliance Project Manager Note (only for Blythe Solar Sites) see line 13.	Anwar Ali	(916) 698-7498	N/A	N/A
ROCC	N/A	(561) 694-3636	N/A	N/A
Security Operations	N/A	(561) 694-5000	N/A	N/A

4. Any work-related permits in effect shall be immediately voided, and personnel involved in such work shall cease all activities.
5. All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.
6. Based upon the type and extent of the emergency, the site leader shall assess whether an evacuation should be initiated.

7. The following criteria should be considered in rendering a decision to conduct an evacuation of the facility:
 - a. Reference [PGD-OD-SAF-005](#) (Control Room evacuation) as applicable
 - b. The affected parts of the facility and severity of the emergency.
 - c. Restrictions in Egress routes caused by the emergency.
 - d. Wind direction (if the emergency involves gases/vapors)
 - e. Sustained wind speed is greater than 40 mph
 - f. People currently located at the facility (day shift, night/weekend shift, visitors/contractors, etc.)
 - g. If the Site/Plant Leader determines that a facility evacuation is necessary, he/she must determine which type of evacuation to direct.
8. The following sections describe the types of evacuations that can be performed:
 - 1) Immediate Site Evacuation
 - i. This type of evacuation would be used only in the event of an emergency grave enough to warrant immediate evacuation of all personnel.
 - ii. In this type of evacuation, operating area personnel shall evacuate without regard for shutdown of plant systems or for placing plant systems in the safest mode possible.
 - iii. This type of evacuation shall only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.
 - iv. The production leader will designate production technicians to assist with the evacuation of any employee, visitor or contractor who may have special needs that could limit their ability to evacuate safely.
 - 2) Delayed Site Evacuation
 - i. This type of evacuation would be used in a serious emergency situation where non-essential personnel (those not involved in plant operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the facility prior to evacuating.
 - ii. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the facility.
 - iii. The Site/Plant Leader and/or Facility Emergency Coordinator must assess whether or not the prevailing circumstances warrant keeping essential personnel in plant operating areas to perform a controlled shutdown of the facility.
 - iv. If personnel will not be exposed to unnecessary danger to perform facility shutdown and/or place the facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.

9. Although the Site Leader or Emergency Coordinator may initially designate an evacuation to be a Delayed Site Evacuation, they shall always be mindful conditions may change rapidly, and result in the need to call for an immediate Site Evacuation.
10. If the Site/Plant Leader (or Facility Emergency Coordinator, as appropriate) determines that an evacuation is necessary, he/she shall ensure that a sounding of the plant alarm is initiated.
 - a. In this case, an evacuation alarm will be sounded and all employees/visitors accounted for.
 - b. The Site Leader or Emergency Coordinator shall designate an employee(s) to assist in evacuation of any employee, visitor, or contractor who may have special needs that could limit their ability to evacuate safely
11. If an evacuation has been directed, and following the sounding of the evacuation alarm, the Site/Plant Leader shall ensure that instructions for evacuation are communicated to personnel over the site/plant radio system. These instructions should include the following items at a minimum:
 - a. The type of evacuation to be performed (Immediate Site Evacuation or Delayed Site Evacuation)
 - b. The nature of the emergency
 - c. The location(s) of the emergency
 - d. Any egress routes that should not be used by evacuating personnel (if known and applicable)
12. If an evacuation has been ordered, personnel shall follow one of the following evacuation procedures, as appropriate, based upon the direction of the Site/Plant Leader and/or Facility Emergency Coordinator:
 - a. Immediate Site Evacuation Procedure (APPENDIX 10)
 - b. Delayed Site Evacuation Procedure (APPENDIX 11)
 - c. Perform the appropriate follow-up per the appendices listed on 8.5.1 above.
 - d.
13. PER COM 13 Incident Reporting, The project owner must notify the CPM within 1 hour of any incident during operation that affects, health, safety, environment, or facility operation, followed by a detailed incident reporting within 1 week

8.7. Emergency Action Plan Annual Drills

1. It is the responsibility of the Site Leader to ensure FOUR Emergency Action Plan Drills are performed each year.
2. Emergency Action Plan Drills are to be held quarterly to ensure all site teammates have gone through at least one drill per year
 - a. The type and content of drill (full functional drill, table top, etc.) will be determined by the site leader based on current needs. [Suggested drill type list](#).
 - b. At least one of the quarterly drills SHALL be a fire drill
3. In addition to performing the drills, the Emergency Action Plan must be reviewed for accuracy.
 - a. Make updates as required and forward revised plan to the Plant / Site emergency coordinator. As applicable, concurrently update the iRAMF application to reflect any Emergency Action Plan changes.
 - b. Ensure site team has been trained on any changes.
4. Each drill's content will be determined by the site leader based on current needs.

5. Every site should have (and practice) an alternate emergency evacuation path. The type of drill (table top, full functional drill, etc.) will be determined by the site leader based on current needs, but it must include a documented evacuation of the O&M / service building.
6. The targeted drill response time is less than 4 minutes, monitor and record the response time to determine if all employees responded in a timely manner.
7. Every site should have an identified off site muster area.
8. Each site shall contact the ROCC/FCC as part of the drill. ([See Technology Table in section 5.0 Definitions](#))
9. A roster of drill attendees and date of drill will be filed with sites' Emergency Action Plan documents
10. Any gaps or action items that are a result of the drill will be identified, resolved, fully documented, and filed with the sites' Emergency Action Plan documents.

Note: That MAXIMO is to be used to document actual tasks to be completed to close gaps.

End of Procedure

APPENDIX 1 NATURAL DISASTER / SEVERE WEATHER EVENT

1. Natural emergencies considered in this procedure are associated with weather disturbances such as tornadoes, flooding, hurricanes, blizzards, high wind conditions, earthquakes, wildfires and severe thunderstorms. Flooding waters, lightning, high winds and heavy rains may be detrimental to the employees and/or equipment and structures at the facility. Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Plant Leader at the facility has several means to monitor these weather-related emergencies. These include:
 - Internet access to weather-related websites.
 - AM/FM radio to monitor local news stations
 - NOAA weather app
 - PGDAPPS WeatherSentry Online
 - PGD Severe Weather Notification System
2. When information is received that a severe weather watch has been issued for the facility area the following actions shall be taken:
 - a. Site Leader shall notify the General Manager.
 - b. General Manager shall make a determination about whether or not the plant should be shut down due to the weather situation.
 - c. Personnel shall seek indoor shelter in the plant in a designated secure location, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility.

Note: Earthquake preparedness - At Home - At Work - At Play: [Earthquake Safety Checklist](#)

3. In the event of a natural disaster / severe weather event, where advance warning is known, such as a hurricane, blizzard, etc. the plant / site personnel shall closely coordinate with the PGD Emergency Response Coordinator, during pre and post event activities.
4. In the event of a severe weather / natural earth process event such as a severe thunderstorm, high wind conditions, earthquake, etc. where advance warning may not be known, the plant / site shall refer to the site-specific operating plans to take the actions necessary to assure the safety of all employees and the public. Additionally, site personnel will take reasonable action to prepare for the event to address environmental exposure and the securing of equipment, consistent with the event conditions. However, under no circumstances are personnel to place themselves in harm's way.
5. The following list represents actions that should be taken at the site in order for it to be secured. The listing is not intended to be all inclusive and will vary in applicability pending advance warning of the on-set of the event.
 - Ensure all personnel evacuate towers if lightning is in the area or if there are other unsafe conditions that warrant climbing to be unsafe.
 - Ensure site personnel are safe and accounted for.
 - Review staffing levels and arrange for additional staffing "Storm Riders" as applicable
 - Secure plant equipment as necessary and as weather conditions permit, noting to properly follow established guidelines to safeguard personnel while working outdoors in

preparation for severe weather. Reference the Wind Speed Matrix in [SMS 247 - Severe Weather Guidelines](#) to assess preparation work conditions.

- Seek safe shelter. If in your vehicle in winter, ensure survival kit and enough gas is in place.
- Ensure all portable equipment is stored indoors.
- Ensure that switchgear, load center, and tower doors are closed and latched.
- Ensure that the building doors are closed and latched.
- Place all trashcans in locations not exposed to weather.
- Make a general housekeeping inspection and ensure that all loose objects and debris that could potentially become airborne are secured or inside.
- Ensure all radios are fully charged.
- Secure all CONEX Storage buildings.
Note: Use caution when using self-locking CONEX box as a teammate(s) may get trapped from the inside.
- Monitor the weather conditions.
- Ensure that there is an ice plan for walkways
- Ensure all compartments accessory doors and closed and latched.
- Ensure all sump pumps are in good working condition.
- Ensure the proper condition and location of all mobile and gantry cranes, hoists, and booms.
- Test the DC emergency and other back-up systems

6. Control room operator or other person appointed by the person in charge will:

- Monitor the weather radio, TV or other monitoring equipment, and report any changes in the situation that could affect plant / site personnel and / or equipment to the Person in Charge.
- Ensure sustained wind speeds are not greater than 39 mph before sending personnel outside plant buildings
- Sound plant alarm system if a tornado or other similar severe weather warning is issued.
- Follow instructions from the Person In Charge in the case of equipment shutdown is necessary.
- Notify the FCC of the potential of a severe weather / natural earth process event.

7. Operations:

- Operate the plant consistent with instructions provided from the Transmission Operator (TOP). If, the instructions cannot be followed, i.e. safety, environmental, reliability, etc. immediately notify the Transmission Operator to discuss and alternative operating actions. Document discussions in the Operators log.
- When conditions are "forecasted" such high winds associated with a hurricane, or other related conditions such as floods and / or storm surge, considerations for equipment shutdown should be taken consistent with the PGD Hurricane Management Plan ("White Paper") and site specific operating plans.

Note: The decision to remove units from service will be discussed between Plant Management / Person in charge, the PGD Emergency Response Coordinator, appropriate VP of Operation in conjunction with the respective Transmission Operator, to produce the operation plan for the plant.

[PGD Emergency Preparedness SharePoint Page](#)

APPENDIX 2 FIRE EVENT RESPONSE

This appendix describes measures the site shall take to prevent or minimize potential fire severity and to safely respond to a fire emergency. Refer to [SMS 222](#) Fire Prevention and Life Safety.

In the event that a fire occurs, the safe and expedient response actions are essential to protect the health, life, and safety of personnel, the environment, and minimize equipment damage. Sites shall have a list and location map of fire extinguishers.

Person In Charge (PIC) Responsibilities

The PIC shall determine the following:

1. Need to muster or evacuate personnel
 - a) In this event, teammates shall remain in muster location until the “all clear” is issued by Unified Command or the PIC
2. Equipment or activities to be shutdown, stopped, or isolated
3. IF Renewable Site - Report Fire to ROCC
4. IF Fossil, Instruct Control Room to notify local Fire Rescue and EMS
OR IF Renewable Site - PIC will notify local Fire Rescue and EMS
 - a) In the event local Fire Rescue or EMS is dispatched, designate site personnel to escort Fire Rescue, EMS, and HAZMAT to the fire location and provide specific information about equipment, hazardous chemicals, electrical sources, fuels, lithium-ion batteries, or other risks.
 - b) Refer to off-normal procedures for specific actions as applicable.

RACE Protocol

A person discovering a fire shall follow the **RACE** protocol as described below:

Rescue anyone in danger (only if safe to attempt);

Alarm, call the Control Room (via plant phone, cell, or 2-way radio) to report the fire: Person in Charge (PIC) shall make the determination to call 911 and sound the alarm

Report the following:

1. Explain the location and cause, if known, of fire
2. List the injuries, if any, that have occurred
3. Relay any actions, if any, that have been taken to extinguish an incipient stage fire

Contain the fire (only if safe to do so)

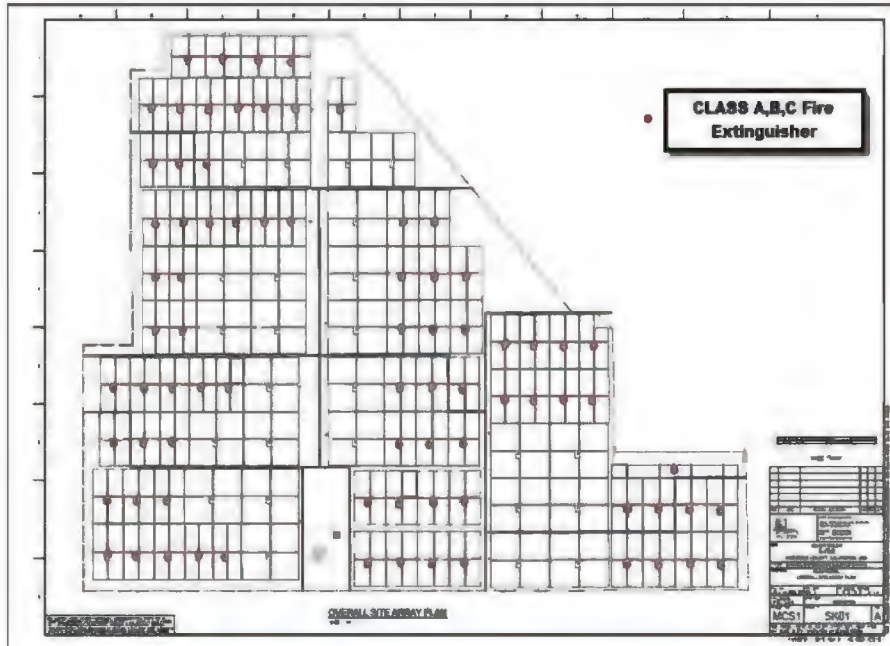
Extinguish the incipient stage fire (only if trained and it is safe to do so)

A person discovering a fire in an incipient stage shall choose to attempt extinguishing the fire only if the following two criteria are met:

1. Fire can be extinguished or controlled with 1 portable fire extinguisher, and
2. They perceive an adequate level of safety to extinguish the fire

Note: Fire-fighting efforts beyond incipient stage shall be performed by only local Fire Rescue

Fire Extinguisher Deployment Plot



Attachment 1, List of Major Fire Hazards

(Blythe, McCoy, Arlington) Major Fire Hazards Risk Management

List of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard

Fire Hazard	Location	Handling/Storage Procedures	Potential Ignition Source	Ignition Source Control Method	Fire Protection
BESS battery thermal runaway	All BESS locations	Maintained inside battery containers	High battery container temperatures	Temperature controlled battery containers using HVAC units	NOVEC strips integrated into battery modules design and construction
Fuel trailers	McCoy Commons	Parked on concrete slabs	Open flames and combustible materials	Site policies for hot work and designated smoking areas	In event of fire, clear personnel from area, contact Fire Department, monitor from safe distance, and allow to self-extinguish

Note: Fire extinguishers shall only to be used for small incipient stage fires. Only trained firefighters shall attempt to mitigate a fire that is beyond the incipient stage. Portable fire extinguishers are classified according to their size and intended use on four classes of fires. The general operating instructions can be remembered by the letters P-A-S-S.

- Pull the pin at top of the extinguisher (that keeps the handle from being pressed)
- Aim the nozzle toward the base of the fire
- Squeeze the handle to discharge the agent inside (15-30 seconds of discharge time)
- Sweep the nozzle back and forth at base of the flames to disperse the extinguishing agent

Fire Classifications

Class A - Fires involving ordinary combustible materials (e.g., wood, cloth, paper, many plastics) Water as a cooling or quenching effect to reduce temperature of burning material below ignition temperature.

Class B - Fires involving flammable liquids and gases. Smothering or blanketing effect of oxygen exclusion is effective.

Class C - Fires involving energized electrical equipment. always attempt to de-energize high voltage circuits and treat as a Class A or B fire depending upon the fuel involved.

Class D - Fires including combustible metals such as magnesium, titanium, and potassium. Extremely high temperature of burning metals makes water and other common extinguishing agents ineffective.

Class K - Fires involving cooking products (fats, grease, oils). These extinguishers work on the principle of saponification.

Special Risks

Special risks include sites with anhydrous ammonia and lithium-ion batteries. These sites shall develop additional safety measures to include:

1. Hazard signage (conforming to [SMS 270](#) Safety Signs, Barriers, and Equipment Tags) at site access point(s) on each battery storage building
2. Maintain fire detection and fire extinguishing systems in operable condition
3. Develop and maintain hazard specific procedures (i.e. off-normal procedures) for managing fire events

Battery Storage Fire Response Procedure

If NextEra Energy Resources Representative on Scene When Fire Department Arrives:

1. NextEra Energy Resources representative will request that the affected feeder breaker(s) are opened remotely
2. Upon arrival the fire department is requested to establish a perimeter to prevent the fire from spreading and cordon off the area until further instructions are received from the NextEra Energy Resources operations staff.
3. NextEra Energy Resources representative will also:
 - a. Notify the fire department that the equipment has been isolated by opening disconnect switches
 - b. Inform the fire department of any known hazards and provide SDS data
 - c. Notify the fire department of the type of fire suppression system, as applicable, and if it has discharged
4. NextEra Energy Resources recommends to NOT open any battery container door(s) until after 48 hours following the initiation of the event.

If NextEra Energy Resources Representative Not on Scene When Fire Department Arrives:

1. If there is a personal injury with hazard, someone in immediate danger, or the area needs to be de-energized, the fire department may call the NextEra Energy Resources Control Center (ERCC) at 888-202-6337 and ask them to remotely de-energize the area.
 - a. The fire department cannot consider the site free of electrical hazards until NextEra Energy Resources operations staff arrives and confirms the area is clear
2. The fire department is requested to establish a perimeter to prevent the fire from spreading and cordon off the area until the NextEra Energy Resources operations staff arrives
3. NextEra Energy Resources representative will
 - a. notify the fire department once the site has been isolated by opening the disconnect switches
 - b. inform the fire department of known hazards and provide SDS data
 - c. notify the fire department of the type of fire suppression system and if it has discharged
4. NextEra Energy Resources recommends to NOT open any battery container door(s) until after 48 hours following the initiation of the event.

Battery Storage Emergency Contact Information

- Renewable Operations Control Center (ROCC): 561-694-3636 (24/7/365)
 - ROCC is primary contact for notification in the event of emergency
- Energy Resources Control Center (ERCC): 888-202-6337 (24/7/365)
 - ERCC is the primary contact for remote isolation of power to the site in the event of an emergency
- Site Leader/Manager: Gil Makabenta, 760-922-7820
 - Contact for non-emergency issues/questions

APPENDIX 3 PHYSICAL SECURITY EVENT

The purpose of this document is to describe the roles, responsibilities, and the associated actions in response to PHYSICAL SECURITY incidents, which includes but is not limited to INTRUSION, DRONES, BOMB THREATS, SABOTAGE, VANDALISM, TERRORISM or OTHER security events at a PGD facility.

Physical Security Definitions:

1. **Bomb Threat:** A threat, usually verbal or written, to detonate an explosive or incendiary device to cause property damage, death, or injuries, whether or not such a device actually exists.
2. **Facility:** A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)
3. **Intrusion:** The unauthorized / illegal entrance to a facility.
4. **Sabotage:** A willful and malicious act with the apparent intent of disrupting normal operations of PGD facilities; specifically, for generation and transmission facilities, a willful and malicious act with the apparent intent of interrupting or reducing production of power plants or transmission facilities. Examples include but are not limited to suspicious packages, bomb threats; unusual occurrences suspected or determined to be caused by physical, cyber or communication attacks that could affect electric power system reliability.
5. **Suspicious Substance:** Includes powders and liquids that present a threat of human exposure to harmful agents. A suspicious substance could also be a package and should be considered for explosives and radioactivity.
 - o **NOTE:** If the site identifies a suspicious substance or package they shall follow the [Corporate Suspicious Substance Response Guidelines](#)
6. **Vandalism:** The intentional destruction of PGD property. Examples include but are not limited to defacing company property, breaking windows, placing glue into locks, tire slashing, damaging a physical security system, and damaging a computer system.

Person/site experiencing the potential Physical Security incident:

All PGD employees have an obligation to report Physical Security events, including disturbances and/or unusual occurrences on PGD facilities that are suspected or known to be an act of / or actual occurrence of intrusion, receipt of a bomb threat, known or suspected acts of sabotage or vandalism, etc. The person discovering/witnessing the potential Physical Security incident shall immediately report the incident to:

- 1 Your immediate Supervisor
- 2 Security Operations at 561-694-5000

If the incident involves a Power Generation Division generating facility, then the following additional contacts must also be made:

- 3 FCC / ROCC
- 4 Local Law Enforcement
- 5 FPL System Operator if the incident is at an FPL facility (305-442-5744)

During the report describe what you have discovered/witnessed and the location of the affected facilities to include the items outlined below, as available:

- a) Date and time of the incident
- b) Description of the incident
- c) Likely target
- d) Number of people involved
- e) Suspect and/or vehicle information
- f) Type of equipment or material used for the activity
- g) Generation capacity affected in Megawatts
- h) Was there an actual or suspected physical attack that could cause a major impact to the Bulk Electrical System (e.g. generator, transformer, fuel supply)?
- i) Was there any destruction of any security systems (cameras, badge readers, security barriers, locks) or any of its components?
- j) Was there any actual or suspected cyber or communication attack that could impact the Bulk Electrical System adequacy or vulnerability? (See the Cyber Security Response section for more details regarding Cyber Security events)
- k) Are there mitigation measures in place to correct the event?
- l) Name and contact number for the point of contact

Has local law enforcement been notified by the reporting person/site? If yes, provide the contact information and case number if available. If not, work with Security Operations to determine the need to contact local law enforcement.

RECOGNIZING ACTS OF TERRORISM, HOSTILE INTRUDER & SIGNS OF POTENTIAL VIOLENCE

If a Hostile Intruder enters the Blythe, McCoy, Arlington, each person shall quickly determine the most reasonable way to protect his/her own life. Visitors and contractors are likely to follow the lead of employees and managers during a hostile intruder situation.

During such an event, each person shall take the following actions, accordingly:

1. EVACUATE

- Have an escape route and plan in mind
- Leave your belongings behind
- Keep hands visible

2. HIDE OUT

- Hide in area out of intruder's view
- Block entry to your hiding place and lock the doors
- Mute or turn off your cell phone

3 TAKE ACTION (As last resort and only when your life is in imminent danger)

- Attempt to incapacitate the intruder
- Act with physical aggression and throw items at the intruder

4 Call 911 when it is safe to do so

Note: Keep cell phones on mute/vibrate

For additional information refer to Corporate Security Policy, [Procedure #NEE-SEC-1720. Hostile Intruder Response Procedure.](#)

An active shooter may be a current or former employee, or an outsider. Call Security Operations Center (SOC) at 561 694- 5000 if is believe an employee exhibits potentially violent behavior.

For employees, Indicators of potentially violent behavior may include one of the following:

- Increased use of alcohol and/or illegal drugs

- Unexplained increase in absenteeism, and/or vague physical complaints
- Depression/Withdrawal; Increased talk of problems at home
- Increased severe mood swings, noticeably unstable or emotional responses
- Increase in unsolicited comments about violence, firearms, other dangerous weapons and crimes

For additional information refer to Corporate Security Safe and Secure Workplace Policies, [Procedure #NEE-SEC-1768](#)

In the event that the site receives threatening correspondence either by phone or by other means of communications, the following actions should be performed immediately:

1. Actions by the person receiving the threat:
 - a. Gather as much information as possible from the person making the threat.
 - b. If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted.
 - c. If the threat is being made verbally (phone, or other), communicate and obtain information from the individual making the threat for as long as possible. For phone threats note the time of the call, do not interrupt the caller and describe the tone of voice as well as any background sounds.
 - d. Inform the Site/Plant Leader and/or General Manager of the situation.
 - e. Contact Security Operations Center (SOC) at 561-694-5000
 - f. Contact local law enforcement, as applicable (e.g. 911)
 - g. Contact the (FCC) at 561-694-3600 or (ROCC) at 561-694-6363 (See Technology Table in section 5.0 Definitions)
 - h. Communicate the Physical Security Event to all on-site personnel.
 - i. Document / update the event in the Service Request application in Maximo.
 - j. Refer to the PGD Sabotage Reporting procedure at: [NEE-SEC-1764 - Security Notifications and Event Reporting](#)
 - k. This document should be consulted in order to assure adherence to the latest definitions and reporting instructions for sabotage and vandalism.
 - l. Refer to the following procedure: [PGD NERC Disturbance and Security Event Reporting EOP-004 Operating Plan](#)
2. During the report describe what you have discovered/witnessed and the location of the affected facilities to include the items outlined below, as available:
 - The date and time of the incident
 - Description of the incident
 - Likely target
 - Number of people involved
 - Suspect and/or vehicle information
 - Type of equipment or material used for the activity
 - Generation capacity affected in Megawatts
 - Was there an actual or suspected physical attack that could cause a major impact to the Bulk Electrical System (e.g. generator, transformer, fuel supply)?
 - Was there any destruction of any security systems (cameras, badge readers, security barriers, locks) or any of its components?

- Was there any actual or suspected cyber or communication attack that could impact the Bulk Electrical System adequacy or vulnerability? (See the Cyber Security Response section for more details regarding Cyber Security events)
- Are there mitigation measures in place to correct the event?
- The name and contact number for the point of contact

3. The Plant Leader and/or General Manager may consider any or all of the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

- Order an evacuation of the facility
- Never use radios or use cell phones near a suspected bomb
- Call 911 for Police or Fire Assistance if they have not already been notified
- Arrange for additional security personnel for the facility.
- Direct plant personnel to commence a controlled shutdown of the facility.
- Direct searches to be performed on vehicles entering the facility.

Note: The latest version of the corporate bomb threat report may be found through the following link: [Bomb Threat Form](#)

Refer to the following procedure: [NEE-SEC-1760 – Responding to Bomb Threats](#)

In case of an evacuation due to a bomb threat, please refer to the information below to maintain a safe distance.

BOMB THREAT EVACUATION DISTANCES

THREAT	THREAT DESCRIPTION	EXPLOSIVES CAPACITY ¹ (TNT EQUIVALENT)	BUILDING EVACUATION DISTANCE ²	OUTDOOR EVACUATION DISTANCE ³
	PIPE BOMB	5 LBS/ 2.3 KG	70 FT/ 21 M	850 FT/ 259 M
	BRIEFCASE/ SUITCASE BOMB	50 LBS/ 23 KG	150 FT/ 46 M	1,850 FT/ 564 M
	COMPACT SEDAN	500 LBS/ 227 KG	320 FT/ 98 M	1,500 FT/ 457 M
	SEDAN	1,000 LBS/ 454 KG	400 FT/ 122 M	1,750 FT/ 534 M
	PASSENGER/ CARGO VAN	4,000 LBS/ 1,814 KG	640 FT/ 195 M	2,750 FT/ 839 M
	SMALL MOVING VAN/DELIVERY TRUCK	10,000 LBS/ 4,536 KG	850 FT/ 263 M	3,750 FT/ 1,143 M
	MOVING VAN/ WATER TRUCK	30,000 LBS/ 13,608 KG	1,240 FT/ 375M	5,500 FT/ 1,682 M
	SEMI-TRAILER	60,000 LBS/ 27,216 KG	1,570 FT/ 476 M	7,000 FT/ 2,134 M

Terrorist Bomb Threat Stand-Off

All personnel must either seek shelter inside a building (with some risk) away from windows and exterior walls, or move beyond the Outdoor Evacuation Distance.

Preferred area (beyond this line) for evacuation of people in buildings and mandatory for people outdoors.

¹ Based on maximum volume or weight of explosive (TNT equivalent) that could reasonably fit in a suitcase or vehicle.

² Governed by the ability of an unstrengthened building to withstand severe damage or collapse.

³ Governed by the greater of fragment throw distance or glass breakage/falling glass hazard distance. Note that pipe and tank/cargo bombs or same-sized charges which throw fragments farther than vehicle bombs.

Note: At the first sign of a potential intruder trespassing into an accessible tall structure at the site, immediately proceed to back off, observe from a safe distance and call Corporate Security as well as the Local Law Enforcement. Law enforcement responders are trained to protect and serve their communities. Emergency responders from the local law enforcement department may require a quick training/briefing to safely enter and climb the structure (if applicable) as well as fall protection equipment. After they provide a verbal command to the potential intruder(s), they may need access the structure. To the extent possible, facilitate their ability to enter without interfering with their efforts.

APPENDIX 4 CYBER SECURITY EVENT

Detection:

1. Site personnel may take the role of a First Responder when they become aware of a cyber-incident or the potential for a cyber-incident from any of the following sources:
 - 1) System page/email alert to an administrator/operator.
 - Employee or BU that first recognizes a potential incident that needs to be reported to NEE Security Operations Center.
 - Notification from the ROCC
 - Business Unit contacted by external agency: e.g., NERC, FERC, SERC, another outside source.
 - Outside source Notification may come as part of NEE's Security Notifications and Event Reporting Policy ([NEE-SEC-1764 - Security Notifications and Event Reporting](#)).
2. Site must quickly assess if event is a cyber incident. This may require support from the ROCC, IT, Fleet Teams, Vendors, Information Security, etc. If this cannot be quickly determined, the site must assume the incident is cyber related and proceed with Response.

Response:

3. Site coordinates with ROCC make the unit safe or stabilize the unit as needed for the protection of personnel, environment and equipment, and plans the recovery if appropriate.

Use chart below for guidance of actions based on observations and/or unit conditions

Potential Operator Actions	Observations/Unit Conditions
Monitor Only	<ul style="list-style-type: none"> • Event appears to impact only corporate business applications and functions (IT only) • Units are not behaving erratic • All noted indications appear normal and appropriate (can validate using local indicators)
Place site in local SCADA control (Off AGC)	<ul style="list-style-type: none"> • Notification of system compromise from the ROCC • Unit not responding to remote AGC setpoints or moving without AGC setpoint changes
Disconnect Control network from the IT network (Island the site) <i>Use your sites Off Normal Event procedure "OT Disconnect Procedure" for details to help identify locations of the network devices needed for OT disconnection</i>	<ul style="list-style-type: none"> • Loss of local HMI's (if applicable) • Plant SCADA Networks slow/unresponsive • Multiple wind turbine/inverter trips with no obvious root cause • Suspected/abnormal alarms and/or unit indications • Loss of ability to control from ROCC using SCADA (Non-Responsive) • Observed unauthorized remote control of local SCADA servers • Under the directive of IT/CSIRP/I&C Fleet/ROCC/Renewables Fleet Teams
Possibly remove all units from service	

- First Responder should be prepared to describe the incident in detail to the Security Operations Center (SOC). The First Responder is not required to investigate and determine if the event is an actual cyber security incident.
 - First Responder shall notify their Immediate Supervisor and the ROCC
4. Site Communicates to the appropriate parties which will trigger our Cyber Security Incident Response Plan (CSIRP), via available mode of communication (e.g., Cell phones, Satellite phones, Harris Radios, etc.).
- a. Immediate Supervisor
 - b. Security Operations Center (561-694-5000) or the ITSC (305-552-4357)
 - c. Plant General or Regional Manager
 - d. ROCC (FCC will release awareness notification)
 - 1) ROCC will follow [PGD-JB-FPDC-ON 1315181201 NERC Security and Event Reporting EOP-004-2 Operating Plan](#) for cyber-attack reporting purposes
 - e. Local Emergency Services, if appropriate
- 5 Plant shall follow directions as provided by Corporate CSIRP Team.

If possible, preserve current state of cyber devices for forensic evidence (e.g. don't disconnect, reset, reboot or power cycle) unless instructed to do so

Recover:

- 6 Recovery instructions will be provided post event by Corporate CSIRP Team with EOSS support.

APPENDIX 5 CAPACITY / TRANSMISSION EVENT

Plant Site Roles and Responsibilities

4. Site Control Room Operator, ROCC Operator, or Person receiving CAPACITY SHORTFALL
 - a. If the communication of a Capacity Short-Fall is for informational purposes and no Operator action is required the individual receiving the communication shall notify the ROCC, Site Leader/Plant Leader or other person in charge providing the information outlined below as available.
 - b. If the communication of a Capacity Short-Fall requires Operator Action the Site Control Room Operator, ROCC Operator or Person receiving a CAPACITY SHORTFALL notification from the respective Transmission Operator or other Reliability Entity e.g. Balancing Authority, Reliability Coordinator, shall immediately comply with directive / operating instructions received from the Transmission Operator or provide an explanation as to why the directive / operation instruction cannot be performed e.g., safety, environmental, reliability, regulatory, etc.
 - c. Three part communication with the Reliability Entity shall be used and the communication shall be logged. The ROCC, Site Leader / Plant Leader or other person in charge shall be contacted and provided the information outlined below as available.
 - 1) Content of communication from the Reliability Entity
 - 2) Name of individual who called
 - 3) Time of call
 - 4) The general communication received or the directive / operating instruction received.
5. Site leader/Plant Leader or other Person in Charge
 - a. In response to receiving a CAPACITY SHORTFALL communication, the Site leader/Plant Leader or other Person in Charge will:
 - 1) Validate the notification with Transmission Operator if appropriate
 - 2) Validate the notification with the Control Room Operator
 - 3) Once validated, Direct the CRO to follow the notification instructions
 - 4) Communicate the notification to site management
 - b. If site management is not available, communicate directly with the Operations VP.
 - c. For a NEER facility also contact project business management and ensure that other facility agreements are not violated. It is recommended that the potential for Transmission Operator requests should be vetted and documented before commercial operation of the facility.
 - 1) Communicate notification to the FCC
 - 2) Prepare and review procedures for maximizing output and energy conservation
 - 3) Advise site personnel not to perform any discretionary maintenance, testing or evolutions (with the exception of approved thermal performance testing) which could present a risk to generation
6. All other site personnel not directly involved with responding
7. All other personnel that are not directly involved with responding to the CAPACITY SHORTFALL shall not perform any maintenance or activities that would put Mega Watts (MW's) at risk.

APPENDIX 6 ENVIRONMENTAL EVENT

The spill or release of any chemical, oil, fuels or Heat Transfer Fluid (HTF) is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term “respond” in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of actually stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the Step 1 Example below should not be construed to be acting in the role of a “responder”, as it is defined in OSHA HAZWOPER regulations.

The basic actions to be taken in response to a chemical, oil, fuels or HTF spill or release are the following:

- 1 If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) if it can be stopped without incurring additional personal exposure to the substance.

Example: A person opens the drain valve on a line that results in an unexpected release. If the person can immediately stop the release by closing the valve, this action should be taken if no additional exposure to the chemical will occur by doing so.

- 2 The person discovering a spill/release should immediately move to a location that is a safe distance upwind from the affected area,
 - a. If it is safe to do so under prevailing conditions, remain within observation distance.
 - b. If safe conditions are in doubt, do not risk exposure – leave the area immediately.
- 3 The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Site/Plant Leader should be notified immediately over the radio. Information provided should include all of the following that are known:
 - a. What type of chemical has been spilled/released?
 - b. Location of the spill/release.
 - c. If source of the spill/release has been stopped.
 - d. If injuries or chemical exposure has occurred to personnel.
 - e. Boundaries describing the area of the spill.
 - f. Whether or not the spill is contained.
 - g. Quantity released (if it can be estimated).
 - h. Environmental Impacts (water bodies, streams, ground, roadways)
4. The Site/Plant Leader shall determine based upon the report from the person discovering the spill, whether the circumstances pose a threat to the surrounding community or the environment. If there is any threat to the surrounding community requiring the immediate response of public Emergency Response personnel, the control room shall immediately contact 911. The Site Leader shall also contact at least one of the following specialized emergency responders:

Organization	Expected Response Time	Contact Number
Desert Environmental Services	12 hrs.	(760) 243-7619
CVC	14 hrs.	(661) 391-8310

5. At the Blythe, McCoy, Arlington site, some potential spills have a specific response plans/guidance that must be followed:

a. Contact regional and fleet environmental specialists for guidance

6. The Site/Plant Leader shall notify the Site/Plant Environmental Lead as soon as possible after a Environmental Event has been detected. The Site/Plant Environmental Lead shall contact the ES PGD Operations Support Director or Manager and follow the [EMS-0300 Environmental Event Response Procedure – 1810251303](#) to determine regulatory reporting requirements.

7. If applicable, the Site Leader or the Site Environmental Leader shall closely coordinate with the PGD Emergency Response Coordinator, during pre and post event activities.

8. While remaining at a safe distance upwind from the spill/release, the person discovering the spill shall locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any site drains that are near the location of the spill.

Note: This shall be performed only if it is safe to do so without risking chemical exposure.

9. The person discovering the spill shall attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to prevent others from inadvertently approaching the spill area.

Note: This shall be performed only if it is safe to do so without risking chemical exposure.

10. The person discovering the spill shall remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.

11. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the Environmental Lead shall immediately proceed to the spill area to evaluate severity of the incident.

Note: If any personnel are discovered to be unconscious or otherwise incapacitated upon approach to the spill scene, all personnel shall immediately move upwind away to a safe distance from the unknown threat

12. The Site Leader shall evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform).

13. Once the Leader (or Emergency Coordinator, as appropriate) has determined that adequate containment and barricading of the spill area exists, they shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill and arrange for cleanup/mitigation actions

APPENDIX 7 GAS PIPELINE EVENT

Fuel Pipeline/Asset events have the potential to cause both safety and environmental risks. It is critical to understand your role and to have scheduled drills to prepare to react if such an incident were to occur.

Note: Natural gas is classed as a simple asphyxiant, meaning it has little or no toxic effects but can bring about unconsciousness and death by replacing air and thus depriving people of oxygen. The table below depicts the actions of the first individual discovering the event.

INITIAL RESPONSE ACTIONS ONSITE RESPONSE TEAM
<p>1. Make an Immediate Assessment of the Incident & take actions to protect life and ensure safety of personnel. Determine:</p> <ul style="list-style-type: none"> • Type & quantity of material released • Location & status of material released (contained/uncontained) • Status of source: (controlled/uncontrolled) • Status of all personnel/injuries
<p>2. Stop the Discharge & Shutoff Ignition Sources, if safe to do so. (e.g., act quickly to secure pumps, valves, motors, open flames, etc.). If the incident is clearly the result of an operation that the Observer/First Responder can control safely, take immediate steps to correct the operation.</p>
<p>Warn Personnel – Alert the Control Room in order for them to complete the notification process & all facility personnel at or near the incident scene. The notifications by the control room operator shall include 911, Corporate Security, ROCC, VP of Operations, Emergency Response Coordinator. Note: The FCC will contact System Operations Center, & Emergency Response Coordinator</p>
<p>4. Isolate & Secure the Incident Scene - Account for all personnel & evacuate nonessential personnel upwind of the area.</p>
<p>5. Direct Termination of Appropriate Facility Operations for the safety of personnel if necessary.</p>
<p>6. Activate Site's Response Plan and all Necessary Response Organizations (i.e., Onsite Response Team; Corporate Response Team; 911 as necessary)</p>
<p>7. Establish Incident Command Post with the following ICS roles: Command Staff, Finance, Logistics, Operations, and Planning.</p>

APPENDIX 8 OIL PIPELINE EVENT

The spill or release of oil is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of actually stopping the source of a spill.

The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area,

- If it is safe to do so under prevailing conditions, remain within observation distance.
- If safe conditions are in doubt, do not risk exposure – leave the area immediately.

The table below depicts the actions of the first individual discovering the event.

INITIAL RESPONSE ACTIONS
<p>1. Make an Immediate Assessment of the Incident & take actions to protect life and ensure safety of personnel. Determine:</p> <ul style="list-style-type: none"> • Type & quantity of material spilled • Location & status of material spilled: (contained/uncontained) • Status of source: (controlled/uncontrolled) • Status of all personnel/injuries
<p>2. Stop the Discharge & Shutoff Ignition Sources, if safe to do so. (e.g., act quickly to secure pumps, valves, motors, open flames, etc.). If the incident is clearly the result of an operation that the Spill Observer/First Responder can control safely, take immediate steps to correct the operation.</p>
<p>3. Warn Personnel – Alert Control Room in order for them to complete the notification process & all facility personnel at or near the incident scene. The notifications by the control room operator at a minimum shall include 911, Corporate Security, FCC VP of Operations, Emergency Response Coordinator. Note: FCC shall contact System Operations Center, & Emergency Response Coordinator</p>
<p>4. Isolate & Secure the Incident Scene - Account for all personnel & evacuate nonessential personnel from the area.</p>
<p>5. Direct Termination of Appropriate Facility Operations for the safety of personnel if necessary.</p>
<p>6. Activate Site's Response Plan and all Necessary Response Organizations (e.g., Onsite Response Team; local environmental services contractor, FPL Corporate Response Team; Fire Department as necessary)</p>
<p>7. Establish Incident Command Post with the following ICS roles: Command Staff, Finance, Logistics, Operations, and Planning.</p>

APPENDIX 9 PANDEMIC EVENT

This section addresses the continued safe operation of PGD assets and references the NextEra Energy Business Continuity Plan. Individuals are expected to keep informed through the NextEra Energy communications. Individuals should practice social distancing and safe hygiene practices during high risk events. Travel restrictions may be implemented as part of the containment effort.

During a pandemic outbreak, to minimize the potential transmission of infectious disease in the workplace among essential personnel that must report to a company facility, screening stations and procedures may be implemented at the main entry points of critical company facilities.

Visitors:

Visitors to the site shall follow the Pandemic Event site specific plan that can be found on the [PGD Emergency Preparedness SharePoint site](#). ALL visitors to the site shall fill out a [Visitor Log Form](#)

Outside Vendors/ Contractors

Individual sites may deal directly with outside vendors when scheduling appointments and work. ALL outside vendors and contractors shall fill out a [Visitor Log Form](#).

In the unlikely event that a confirmed exposure to a highly contagious disease (declared by the Center for Disease Control or World Health Organization) at the facility in areas such as control room, control centers and/or site O&M buildings is discovered, any of the scenarios and associated actions outlined on Table 1 may be triggered in order to isolate containment. Critical operations will be maintained with reduced staff at critical facilities or at home.

Activation of this plan is triggered by PGD senior leadership approval.

PGD sites work through the PGD business continuity coordinator to ensure all proper communications under the [NextEra Energy Corporate Pandemic Plan](#) are completed and proper alignment with corporate guidelines is executed.

Table 1: Potential actions for confirmed infection

Scenario One	Scenario Two	Scenario Three
Evacuate the affected individual and all non-essential workers exposed within the prior 7 days. Any Operations at the On-Site Facilities will follow special transition protocols to allow for cleaning and uninterrupted service. *	Quarantine all affected teammates at the site and shelter in place for 14 days or the applicable CDC recommendation to prevent spread	Evaluate generation need, shut the site down if feasible
All evacuated teammates will be quarantined in their homes for 14 days or the applicable CDC recommendation to prevent spread	Bring in provisions, accommodations, and personal protective equipment for teammates	Evacuate all site personnel
Ensure major cleaning of facility in accordance with qualified pandemic removal protocols before individuals are permitted to return to work.	Go to minimum staffing as permitted for 14 days	Conduct major cleaning of facility before individuals are permitted to return to work
As applicable bring in new crews confirmed as not exposed to the contagious disease	Conduct major cleaning of facility before individuals are permitted to return to work	Bring in new crews confirmed as not exposed to the contagious disease to restart the site as generation needs change

*Special transition protocols: Operations will be controlled by ROCC, ROCC FCC Backup Center, ROCC Alternate Work Location, or by New Operations Local Crew. New crew entering the facility, must be wearing health care type personal protective equipment (PPE) such as protective clothing (Tyvek suit), gloves, face shields, goggles, facemasks and/or respirators or other equipment designed to protect the wearer from exposure of infection or illness. Concurrently the cleaning vendor will complete the decontamination of the facility, and any other affected areas. Upon completion, the site will transition with a new crew.

In the event a wind site is evacuated, the turbine repair would be turned over to pre-determined back-up sites from within the clusters / regions managed by CWE. For more remote sites, the site leader or designee will establish communication and arrangements with contracted companies.

Visitors to the site will follow the assigned site plans for Pandemic Event.

Third party contractors experiencing similar challenges, NextEra Energy may consider other methods of supplementing the work force. The temporary hiring of retired employees will be permitted, if the situation demands. This strategy will be particularly useful in those business areas where few individuals are familiar with the job responsibilities and the learning curve for new recruits is high

Outside Vendors

Individual sites may deal directly with outside vendors when scheduling appointments and work. Site leaders know what vendors are coming for onsite work or visits. Vendors and other contractors will be informed of access restriction if from banned locations identified by Center for Disease Control (CDC) and World Health Organization (WHO)

Provisions/Supplies:

PGD Emergency Preparation Team will work closely with Emergency Response Logistic team ahead of the event to ensure all provisions/supplies are quickly available for delivery.

A plan for acquiring food supplies, large amounts of bottled water, portable bedding, etc. should be tied to the appropriate phase of pandemic progress.

- Purchase orders should be established in advance of an outbreak.
- Emergency contact numbers for critical suppliers should be confirmed and tested.
- Known critical parts on order should be expedited.
- Establish ability to process emergency procurement from remote work locations such as home

The following vendor's/cleaning companies may be used to respond to the event.

<u>Vendor Name</u>	<u>Contact Name</u>	<u>Contact Number</u>	<u>Contract #</u>
National Response Corporation (NRC)	Global Response Operations Center	800-899-4672	CTR4600018348

- Additional vendors may be procured through the Emergency Response Logistic Team

Attachment 1: Sample checklist for WHO pandemic stages**Pre and during event:**

- PGD Emergency Preparedness GM meets with PGD senior leaders to assess possible pandemic threat.
- Discuss staffing constraints within business area and possible workforce pools from which additional personnel can be obtained.
- Identify and prioritize essential employees.
- Consider pandemic budget items, volume and cost
- Consider when or if your business area should establish a cost center and WBS # for pandemic associated expenses.
- PGD Emergency Preparedness GM establishes regularly scheduled team meetings
- Evaluate non -essential employees' skill sets for deployment to aid other business units
- Consider meeting / communicating with business unit employees to assess concerns and needs
- Contact working pool candidates to inquire about interest or ability to help in the event of a pandemic. These may include non-essential personnel in other departments with desired skill sets, recently retired employees, contractors, etc.
- Consider timeline for cross training backup workers on critical business processes.
- Begin considering alternative work shift schedules to lessen exposure vulnerabilities. Decide if and when the new schedules would be implemented, and when the workforce would revert back to standard work schedules.
- Have employees who travel review the pandemic travel policies.
- Verify any new pandemic related news and quell any false rumors.
- Notify employees of possible vacation cancellations if the pandemic reaches the action levels. Vacation cancellation will be at the business area / supervisor's discretion.
- Identify possible telecommuters.
- Begin cross training if it has not already taken place.
- Test remote access for all personnel designated as telecommuters during a pandemic event.
- Consider developing a transportation plan for those employees reliant upon public transportation to get to work
- Initiate any new working schedules and personnel distancing policies.
- Initiate teleconferencing policies. No large gatherings, minimize personal contact as much as possible.
- Re -evaluate business process prioritization.
- If deemed appropriate, have approved employees begin telecommuting.
- Track all additional costs associated with pandemic response efforts.

Post Event

- Return departmental manning levels and shifts to their normal configuration.
- Restock all supplies depleted during the prior wave.
- Evaluate your business area's plan. Add additional information to the plan to reflect lessons learned.
- Work with Supply Chain to re -evaluate critical vendors / suppliers

APPENDIX 10 IMMEDIATE SITE EVACUATION PROCEDURE

1. Personnel present in the Administrative Building or control room shall immediately take the following actions:
 - a. Locate and obtain the visitor/contractor sign-in sheet.
 - b. Locate and obtain all immediately accessible hand-held radios.
 - c. Determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated in Appendix 3) and wind direction. Every site should have an identified off site muster area.
 - d. Assign designated plant employees to assist any employees or visitors with special needs that would restrict their ability to get safely and expediently to the muster area.

Note: The primary muster area must be a predetermined location; alternate muster areas are to be selected only when egress routes to the primary muster area are unsafe to proceed along.

2. Pass the following information over the plant radio system:
 - a. The muster area the employees will be proceeding to.
 - b. Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).
 - c. Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area.
 - d. Personnel in the Administrative Building should not delay in evacuating or wait on other personnel that they anticipate may arrive.
 - e. Upon arriving at the designated muster area(s), the group shall designate a Person-in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.
 - 1) After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for.
 - 2) The Person-in-Charge will query by radio or cell phone for personnel who are unaccounted for.
 - 3) The Person-in-Charge shall establish radio communication with the Emergency Coordinator (if applicable) and relay information on personnel for whom are unaccounted.
3. All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location.
4. The "ALL CLEAR" signal will be communicated by Radio or cellular telephone.
5. The Person-in-Charge shall continuously monitor the plant radio system when at the muster location.
6. Personnel present in the facility operating area (other than Administrative Building) shall immediately perform the following actions:
 - a. If not monitoring the plant radio system, immediately turn on hand-held radios.

7. Proceed to the designated Muster area unless the egress route to the Muster area is not safe for travel. In such a case, proceed to an alternate Muster area.
8. Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated Muster area.
9. Upon reaching the appropriate Muster area, report to the Person-in-Charge and continue to monitor the plant radio system.
10. If no other personnel are present at the Muster area upon arrival, communicate this to the Site/Plant Leader.
11. Personnel not in the operating areas of the plant (to include the administration building and inside parking areas) shall immediately perform the following actions:
 - a. Locate and obtain all immediately accessible hand-held radios.
 - b. Proceed to the designated Muster area.
 - c. A Person-in-Charge shall be designated for the Muster area. In many cases, this will be the Emergency Coordinator.
 - 1.) In the event that the Emergency Coordinator is in plant operating areas or has proceeded to an alternate muster area, he/she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency.
 - 2.) If the Emergency Coordinator is not present at the muster area, the Person-in-Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives.
 - 3.) The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

APPENDIX 11 DELAYED SITE EVACUATION PROCEDURE

1. Personnel present in the Administrative Building shall immediately perform the following actions:
 - a. Take necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.
2. Locate and obtain the visitor/contractor sign-in sheet
 - a. Communicate names of visitors/contractors currently in the operating areas to outside operating personnel.
 - b. Instruct outside operating personnel to locate and direct all visitors/contractors to proceed to the Administrative Building for egress instructions.
3. When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the Administrative Building, the Site Leader (or Emergency Coordinator, as appropriate) shall designate a trained person to escort all non-essential personnel to the designated Muster area along the safest egress route.
4. Notify the Emergency Coordinator and Production Staff of the current facility status, and evacuation details.
5. Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.
6. Once the shutdown has been completed, all essential personnel shall gather in the Administrative Building and take roll call.
7. When all essential operating personnel are present and accounted for, evacuation to the designated Muster area shall be performed, unless the egress route is not safe for travel.
 - a. If evacuation route to the designated muster area is not safe for travel, proceed to the alternate Muster area.
8. Personnel present in the facility operating areas (other than Administrative Building) shall immediately perform the following actions:
 - a. Continuously monitor the radio system for information and instructions.
 - b. Perform immediate response actions, as appropriate, to place the facility in the most stable condition, based upon the type of emergency.
 - c. Locate and direct non-essential personnel to proceed to the Administrative Building immediately.
 - d. Perform facility shutdown instructions as directed by the Site/Plant Leader.
 - e. Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the Administrative Building for instructions.
9. Personnel not in the operating areas of the facility (to include the administration building and parking areas) shall immediately perform the following actions:
 - a. Locate and obtain all immediately accessible hand-held radios.
 - b. Proceed to the designated muster area (see Appendix12).
 - c. A Person-in-Charge shall be designated for the muster area.
 - d. The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.
 - e. The Person-in-Charge at the designated muster area will coordinate outside responding agency activities and provide assistance (to include personnel, resources, and administrative functions) to the Administrative Building as directed by the Emergency Coordinator and/or Site Leader.
10. The Emergency Coordinator shall immediately perform the following actions:
 - a. Proceed to the Administrative Building, or to the location on the facility most appropriate for directing response actions for the emergency.

- b. Coordinate actions related to the emergency and provide directions to muster area Persons-in-Charge.
- c. In the event that the emergency escalates in severity or immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in plant shutdown activities.

APPENDIX 13 PERSONNEL INJURIES AND SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions that shall taken in the event of emergencies related to personnel health.

Although facility personnel should take the most aggressive response actions that are prudent in an emergency, the first action will be to call 911 to initiate the response of outside medical responders.

To prepare facility personnel for such contingencies, it will be the PGD policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation), Bloodborne Pathogens and in the use of an AED (Automated External Defibrillator) if one is available.

Each site will maintain at least one well stocked first aid kit at the Control Room or O&M building and one in each site vehicle. These will be inspected at least monthly. Each plant will determine the locations of their nearest non-emergency Worker's Compensation approved medical facility as well as the Occupational Nurse and post the name, address, and phone number. In the event of an emergency, the 911 responders will determine the best location for emergency care.

AED(s) shall be maintained at the facility at a designated location known and accessible to all staff.

Automated External Defibrillators (AED) – NextEra sites with AEDs will follow their Maximo AED Standard Instruction Protocol

- Notify the local EMS of the existence, location, and type of AED

Employee Training Plan

Businesses that handle hazardous materials are required to have a program that provides employees with initial and refresher training. The HMBEP shall include a training program, which is reasonable and appropriate for the size of the business and the nature of the hazardous materials handled. The training program shall take into consideration the responsibilities of the employees to be trained. The training program shall, at a minimum, include:

- A. Methods for safe handling of hazardous materials stored at your business. Including familiarity with the characteristics and hazards of each material and measures employees can take to protect themselves from chemical hazards;
- B. Procedures for coordination with local emergency response organizations;
- C. Proper use of personal protective equipment;
- D. The prevention, abatement and mitigation procedures you have developed for your business and explained in the HMBEP including proper use of emergency equipment and supplies;
- E. The emergency evacuation plans you have developed, the notification procedure used to alert people to evacuate, and the closest location to obtain appropriate emergency medical care;
- F. Procedures to coordinate with and assist the local emergency personnel that may respond to your business;
- G. Who and how to call for immediate assistance in the event of an accident involving hazardous materials;
- H. Procedures for ensuring that appropriate personnel receive initial and annual refresher training.

All employee training shall be documented and updated annually:

1. Personnel

A. Are there any specially trained hazardous materials emergency response personnel at your business? Yes No Number Trained

Employees are trained to Notify proper personnel and to use spill cleanup materials.

B. Do you have decontamination capabilities for victims of exposure to hazardous materials at your business? Yes No Type of Decon

Remove PPE, wash station

C. Do you have personnel that will provide site security at your business during and after a hazardous materials incident? Yes No

2. Equipment

A. List the type and location of equipment that can or will be used for response to hazardous materials incidents at your business.

Equipment may include absorbent materials, dikes, and other containment materials; fire extinguishers, first-aid kits, and other PPE; air horns, sirens, radios, and other communication equipment. Equipment will be stored in the Move-on Area.



POST FOR EMPLOYEES

HAZARDOUS MATERIALS BUSINESS EMERGENCY PLAN: EMERGENCY NOTIFICATION

During an emergency involving a release or a threatened release of a hazardous material you must notify appropriate agencies. Information you should be prepared to supply includes:

1. Name and telephone number of the reporting party;
2. Name and address of business;
3. Time and type of release (e.g., damaged containers, malfunctioning equipment, etc.);
4. Name and quantity of material(s) involved;
5. Extent and number of injuries;
6. Actions taken or being taken to mitigate or reduce emergency;
7. Potential hazards to human health or the environment surrounding the business.

AGENCY NOTIFICATION:

Fire Department	911
Ambulance/Paramedic	911
Police/Sheriff	911
Hospital Palo Verde Hospital	Phone# 760-921-5235
Primary Facility Emergency Contact Person	
Name Gil Makabenta	Phone # 702-280-1559
County of Riverside	
Hazardous Materials Management Branch	(951)358-5055
City of Corona Fire Department	(951) 736-2220
City of Riverside Fire Department	(951)826-5737
California Emergency Management Agency	(800) 852-7550
National Response Center	(800)424-8802
Poison Control Center	<u>(800)222-1222</u>
Hazardous Materials Cleanup Contractor	<u>(877)324-9628</u>

Name of Contractor (if applicable):

Desert Environmental Services

Other Contacts: _____

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Appendix C

Annual Notice of Extraction and Diversion of Water

ANNUAL REPORT OF WATER DIVERSION AND USE FOR REPORTING PERIOD

Oct 1, 2024 to Sep 30, 2025

Primary Owner: BLYTHE SOLAR 110 LLC
Groundwater recordation Number: G334539

Date Submitted: -

Basic Information

Current water right information

Initial groundwater recordation number: G334539

Below are the current Primary owner, Non-Primary owner, agents, and consultants associated with this water right.

- BLYTHE SOLAR 110 LLC - Primary owner
- Northstar Environmental - Agent

Review all the ways you use your Places of use (POU)

Select all the uses for POU

Other

Are you using any water diverted under this right for the cultivation of cannabis?

-

Beneficial use

Beneficial use details

Monthly data

Select your report type: -

Diversion amount (monthly aggregated)

Please choose which statement describes your water use during this reporting period

-

What unit are you reporting in?

-

Method of measurement

-

What unit are you reporting in?

-

Supplemental information

List any changes in your project since last year (new pump, new land irrigation, new method of irrigation, etc.) or any other comments

-

Upload Documents

General Report Comments

-

Upload documents

Sign & Submit

I certify that the foregoing required statements and the following optional additional statements, if any, are true and correct to the best of my knowledge and belief. false

Signature

-

Date

-

ANNUAL REPORT OF WATER DIVERSION AND USE FOR REPORTING PERIOD

Oct 1, 2024 to Sep 30, 2025

Primary Owner: BLYTHE SOLAR 110 LLC
Groundwater recordation Number: G334540

Date Submitted: -

Basic Information

Current water right information

Initial groundwater recordation number: G334540

Below are the current Primary owner, Non-Primary owner, agents, and consultants associated with this water right.

- BLYTHE SOLAR 110 LLC - Primary owner
- Northstar Environmental - Agent

Review all the ways you use your Places of use (POU)

Select all the uses for POU

Other

Are you using any water diverted under this right for the cultivation of cannabis?

-

Beneficial use

Beneficial use details

Monthly data

Select your report type: -

Diversion amount (monthly aggregated)

Please choose which statement describes your water use during this reporting period

-

What unit are you reporting in?

-

Method of measurement

-

What unit are you reporting in?

-

Supplemental information

List any changes in your project since last year (new pump, new land irrigation, new method of irrigation, etc.) or any other comments

-

Upload Documents

General Report Comments

-

Upload documents

Sign & Submit

I certify that the foregoing required statements and the following optional additional statements, if any, are true and correct to the best of my knowledge and belief. false

Signature

-

Date

-

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Appendix D Riverside County Fire Department Annual Payment

Paying company code: 2000

Payment Doc.No.: 2001118643

Bank details

House Bank:

Bank Key:

Account ID:

Bank Account:

Bank Name:

City:

Check information

Check number: 5000145601

Currency: USD

Payment Date: 01/28/2026

Amount Paid: 124,337.43

Check encashment: 02/26/2026

Cash discount amount: 0.00

Extract Creation: 01/28/2026

01:44:39

Check recipient

Name: COUNTY OF RIVERSIDE

City: PERRIS

Country/Region Key: US

Regional code: CA

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Appendix E

BIO-2 through BIO-26 Biological Resources

Annual Compliance Report
Docket No. 09-AFC-6C

Blythe Solar Power Project Eastern Riverside County, California Reporting Year 2025 Biological Resources

JANUARY 2026

Prepared for:

**CALIFORNIA ENERGY COMMISSION
SITING, TRANSMISSION AND
ENVIRONMENTAL PROTECTION DIVISION**

1516 Ninth Street, MS-2000
Sacramento, California 95814
Attn: Anwar Ali

**U.S. DEPARTMENT OF THE INTERIOR,
BUREAU OF LAND MANAGEMENT
PALM SPRINGS SOUTH COAST FIELD OFFICE**

1201 Bird Center Drive
Palm Springs, California 92262
Attn: Amanda Moore

Prepared by:

DUDEK

40-004 Cook Street, Suite 4
Palm Desert, California 92211
Contact: Sedona Maniak

Table of Contents

SECTION	PAGE NO.
1	Introduction1
1.1	Project Overview1
1.2	Annual Reporting Requirements1
2	Biological Resources Conditions of Certification3
2.1	BIO-2 and BIO-4: Designated Biologist and Biological Monitor Duties3
2.2	BIO-6, BIO-19, CUL-15, PAL-4: Worker Environmental Awareness Program3
2.3	BIO-8: Impact Avoidance and Minimization Measures3
2.4	BIO-9: Desert Tortoise Surveys and Fencing4
2.5	BIO-13: Raven Management and Control Plan.....4
2.6	BIO-14: Weed Management Plan5
2.7	BIO-17: American Badger and Desert Kit Fox Impact Avoidance and Minimization Measures6
2.8	BIO-18: Burrowing Owl Impact Avoidance, Minimization, and Compensation Measures.....6
2.9	BIO-19: Special-Status Plant Impact Avoidance, Minimization, and Compensation.....6
2.10	BIO-22: Change of Conditions Notification6
2.11	BIO-24: Golden Eagle Annual Inventory6
2.12	BIO-25 and BIO-26: Evaporation Pond Monitoring and Couch’s Spadefoot Toad Protection and Mitigation Plan Implementation7
3	Project Incidents and Corrective Actions8
4	Post-Certification Changes 10

INTENTIONALLY LEFT BLANK

1 Introduction

1.1 Project Overview

Blythe Solar Energy Center, LLC completed construction of Units 1–4 of the Blythe Solar Power Project (BSPP or Project), a 485-megawatt photovoltaic solar power generation facility on over 2,000 acres of Bureau of Land Management (BLM)-administered land in unincorporated Riverside County, California. BLM and the California Energy Commission (CEC) initially approved the Project as a 1,000-megawatt solar thermal energy generating facility before it was modified to a solar photovoltaic facility. The completed BSPP solar photovoltaic facility was built within the planned footprint of the approved thermal energy facility. Construction of Blythe Units 1–4 included the solar arrays, support facilities, and shared linear facilities (shared with the neighboring McCoy Solar Energy Project). BSPP Units 1 and 2 began operation on October 29, 2016, and BSPP Units 3 and 4 began operation in January 2021.

1.2 Annual Reporting Requirements

The CEC Presiding Members' Proposed Decision for the modified Project, which contained revised findings and the Conditions of Certification (COC), was approved on January 15, 2014. Certain COCs require annual reporting and/or development of a mitigation plan, which may also contain operations reporting requirements.

The BLM, as the federal agency responsible for management of public lands on which the Project is sited, approved the modified BSPP in a Record of Decision (ROD) for the Project on August 1, 2014, and authorized the construction of the Project in a Right-of-Way (ROW) Grant (serialized as CACA-048811) on August 12, 2014. Appendix 5, Adopted Biological Resource Mitigation Measures, of the BLM ROD, contains all ROW grant holder-proposed Design Features and Mitigation Measures for the Project specific to biological resources. Design Features in the ROD incorporate CEC COCs, some of which require annual reporting.

The annual operations COC and ROD reporting requirements as they relate to biological resources are addressed in this Biological Resources Annual Compliance Report (ACR) for Reporting Year 2025.

INTENTIONALLY LEFT BLANK

2 Biological Resources Conditions of Certification

Compliance with the CEC COCs and the BLM's ROD specific to biological resources is categorized by COC title. Each of the COCs related to biological resources described below is presented for one or both of the following reasons: (1) the COC reporting requirement is specifically required to be addressed in the annual compliance report; and/or (2) the COC is related to mitigation that was implemented during this reporting period.

2.1 BIO-2 and BIO-4: Designated Biologist and Biological Monitor Duties

During Project operation, the Designated Biologist (DB) is required to submit record summaries in the ACR unless his or her duties cease, as approved by the Compliance Project Manager (CPM). The DB was on-call during this reporting period although no biological monitoring activities were required for operations. The DB served as the lead biological contact for the Project owner and the agencies. See the following sections for resource-specific compliance activities.

2.2 BIO-6, BIO-19, CUL-15, PAL-4: Worker Environmental Awareness Program

Personnel are required to undergo Worker Environmental Awareness Program (WEAP) training prior to work at the BSPP. This is to ensure all Project personnel are made aware of the environmental, natural, and cultural resources that exist or may exist at the BSPP; requirements for implementing work practices designed to protect those resources; and penalties associated with violating those requirements. All personnel receiving WEAP training are required to sign in at the beginning of training and receive hardhat stickers to verify that they have received training prior to work on the BSPP. WEAP attendees are also required to provide weed wash certificates for personal vehicles and are provided with a sticker to place on their vehicle as a reminder to look under the vehicle before moving. Training rosters are maintained at the Project environmental office and will be kept on file for 6 months following termination of the individual's employment.

2.3 BIO-8: Impact Avoidance and Minimization Measures

The ACR must include the DB's report of compliance with avoidance and minimization measures implemented during operation and maintenance, including a summary of revegetation activities for the year, a discussion of whether revegetation performance standards for the year were met, and recommendations for revegetation remedial action if warranted. The following section provides a summary of how minimization measures were implemented at the BSPP for biological resources during this reporting period.

Avoid Use of Toxic Substances: Toxic soil binders were not used on the Project site. An approved palliative was applied to the main road as needed for soil stabilization in order to reduce potential for fugitive dust.

Minimize Lighting Impacts: Facility lighting is being maintained to prevent impacts to wildlife habitat.

Avoid Vehicle Impacts to Desert Tortoise: Signage has been placed along the ROW to notify motorists of the speed limit restrictions.

Minimize Ponding Water: Panel washing application rates are limited to minimize ponding of water.

Dispose of Road-Killed Animals: Trained on-site personnel and/or operations staff perform regular inspections of the solar arrays, and wildlife mortalities and injuries are addressed in accordance with the Raven Management and Control Plan.

Minimize Spills of Hazardous Materials: Spill kits are being maintained to clean up any spills that might result during operation activities.

Worker Guidelines: The required WEAP training for all operations personnel and subcontractors includes information about worker guidelines and potential penalties associated with not adhering to these guidelines.

Erosion Control: The operations Designated Inspector is completing post-storm site inspections to identify any potential erosion control issues during operations.

Revegetation of Temporarily Disturbed Areas: The approved Revegetation Plan was implemented to restore all areas subject to temporary disturbance. The results of the implementation of this plan were detailed in the McCoy Solar Energy Project and Blythe Solar Power Project Habitat Restoration Installation Completion Report submitted under a separate cover on November 22, 2016. The third year of revegetation monitoring as described in the Habitat Restoration Plan occurred in 2019.

During each quarterly evaluation period, the revegetation areas met expectations for habitat development for the current stage of the program. The Final Revegetation Report was submitted in June 2019.

2.4 BIO-9: Desert Tortoise Surveys and Fencing

The operations Designated Inspector conducted inspections of desert tortoise fence integrity throughout the reporting period as required by COC BIO-9 and the approved Storm Water Damage Monitoring Response Plan. There was no living, injured, or deceased desert tortoises observed during this reporting period.

2.5 BIO-13: Raven Management and Control Plan

As part of the ACR, the DB is required to provide a report that includes a summary of the results of raven management and control activities for the year, a discussion of whether raven control and management goals for the year were met, and recommendations for raven management activities for the upcoming year. The following provides a summary of the results of raven management and control activities for year of operation in 2024 for Units 1-44.

In accordance with Section 5.1.1 of the Raven Management and Control Plan, monthly point count surveys of the Project Disturbance Area shall be conducted during the first 3 years of Project operations during spring (March–

May) and fall (September–November). The 2023 reporting period marked the third and final year of raven management and control monitoring; no further monitoring will be conducted.

Avian and Wildlife Carcass Removal

Trained on-site personnel and/or operations staff perform weekly inspections of the solar arrays, and non-avian wildlife mortalities and injuries are addressed in accordance with the Raven Management and Control Plan. In accordance with the Biological Opinion and the Special Purpose Utility Permit, wildlife mortalities are reported on a monthly basis. All avian mortalities are collected, bagged, labeled, and kept in a designated on-site freezer. In certain occurrences of observed avian listed species mortalities, disposition requires further direction from the relevant agency. In these cases, the carcass is covered under a protective cover, such as a weighted bucket, until instruction is received.

Summary

Impact avoidance measures are being implemented in accordance with the Raven Management and Control Plan. These include minimizing the ponding of water during operation activities such as washing panels, ensuring operations employees and visiting workers all receive WEAP training, and removing wildlife carcasses to reduce the site's attractiveness to ravens. As indicated by the limited raven use of the Project site during point count surveys conducted through 2023, no additional measures are recommended during the 2025 operations year.

2.6 BIO-14: Weed Management Plan

The DB is required to provide a report in the ACR that includes a summary of the results of noxious weeds surveys and management activities for the year, a discussion of whether weed management goals for the year were met, and recommendations for weed management activities for the upcoming year.

General site monitoring of the operating facility was conducted by designated on-site personnel on an ongoing basis. The monitoring program included the following components:

- Weed identification training was provided.
- Vehicle and equipment use was limited during operation and maintenance. Workers parked at designated paved areas. Equipment needed for repair or maintenance was cleaned off site prior to entering the facility.
- Inspections of bare ground or regularly disturbed areas that interface with natural habitats (e.g., access road and perimeter fence) were conducted least once during the summer/fall and winter/spring growing seasons.
- Weed control was conducted as needed by Project personnel or a trained and certified professional whenever notified by the Biological Monitor or Environmental Compliance Manager of the presence of weeds, but was not conducted more often than every other week during the growing season (March through August) and once a month otherwise.

2.7 BIO-17: American Badger and Desert Kit Fox Impact Avoidance and Minimization Measures

During this reporting period, no kit fox dens were observed onsite. In accordance with the Desert Kit Fox and American Badger Mitigation Monitoring Plan, passive relocation will not occur during operation and maintenance unless (1) injuries or fatalities occur as a result of the Project; (2) there is the possibility of injuries or fatalities; or (3) the fox is problematic for Project operation. No mortalities and no concerns about kit fox safety or operations activities were reported.

2.8 BIO-18: Burrowing Owl Impact Avoidance, Minimization, and Compensation Measures

COC BIO-18 requires that the DB provide a report in the ACR for the first 5 years following the start of operations that describes the results of monitoring and management of the burrowing owl burrow creation or enhancement areas identified prior to excluding burrowing owls from active burrows. No burrowing owls were relocated or excluded from burrows, and no artificial burrows were constructed during Project construction. As a result, no post-relocation monitoring is required. In addition, no observations of burrowing owls were made within the Project site during this reporting period.

2.9 BIO-19: Special-Status Plant Impact Avoidance, Minimization, and Compensation

COC BIO-19 requires the completion of an annual report to monitor effectiveness of protection measures for all avoided special-status plants, including the implementation of required enhancement/restoration activities. The CPM determined that COC BIO-19 does not require any action during operations for the BSPP.

2.10 BIO-22: Change of Conditions Notification

In order to minimize and mitigate impacts to jurisdictional waters, the Project owner is required to “notify the CPM and CDFW [California Department of Fish and Wildlife] of any change of conditions to the project, impacts to state waters, or the mitigation efforts. The notifying report shall be provided to the CPM and CDFW no later than seven days after the change of conditions is identified. A copy of the notifying change of conditions report shall be included in the annual reports or until it is deemed unnecessary by the CPM and CDFW.” There have been no changes to the conditions or impacts to jurisdictional waters by the Project during this reporting period, and no change of conditions notification reports to include in this ACR.

2.11 BIO-24: Golden Eagle Annual Inventory

The Golden Eagle Annual Inventory is required for the first 2 years after commercial operation begins. The purpose of the inventory is to determine golden eagle territory occurrences within 1 mile of the Project area. The second and

final of two golden eagle annual inventories during the operations phase of the Project was completed in January and April of 2022. No further surveys were required in 2024.

2.12 BIO-25 and BIO-26: Evaporation Pond Monitoring and Couch's Spadefoot Toad Protection and Mitigation Plan Implementation

The DB is required to conduct site visits to the evaporation ponds during each year they are in operation. No Couch's spadefoot toads were identified on site during Project construction. No compensatory mitigation is required, and no evaporation ponds were built during construction of Units 1-4. The CPM determined that COCs BIO-25 and BIO-26 do not require any action during operations for the BSPP.

3 Project Incidents and Corrective Actions

No non-compliance incidents or corrective actions were issued or identified during this reporting period.

INTENTIONALLY LEFT BLANK

4 Post-Certification Changes

A list of CPM-approved Post-Certification Changes to the operations of the BSPP is included here:

- The CPM determined that COCs BIO-19, BIO-25, and BIO-26 do not require any action during operations until further construction or evaporation ponds are built.
- The CPM confirmed on August 7, 2017, that a Spill Protection Control and Countermeasure (SPCC) Plan is not required at BSPP and that the Oil Spill Plan submitted by BSPP is equivalent to the SPCC Plan and acceptable for the purpose of meeting HAZ-2 SPCC requirements.
- The CPM confirmed on January 3, 2017, that the Provisional Closure Plan required by COC COM-15 can be submitted 1 year after the start of commercial operation and that the 60-day reference in the COC verification should be disregarded. This plan will be prepared and submitted within 1 year after the final constructed unit (anticipated to be Blythe IV) begins commercial operation (commercial operation occurred November 2020) and will incorporate all four units of BSPP.
- The CPM confirmed in a letter received on April 21, 2020, that the Avigation Easement required by COC TRANS-8 was no longer required.

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Appendix F

AQ-SC-6: List of Equipment

Blythe Solar Power Project (BSPP) 2025 Annual Compliance Report

Make	Model	Vin #	Site Owner
Ford	F150 work truck	1FTFW1L52RKD73435	Blythe Solar 110
Ford	F150 work truck	1FTFW1L57RKD65704	Blythe Solar 2
Ford	F150 work truck	1FTFW3L5XRKD63750	Blythe Solar 2
Ford	F150 work truck	1FTEW1E5XKFD10042	Blythe Solar 3
Altoz	TRX 766l mower	XT726456	Blythe Solar 3
Ford	F150 work truck	1FTEW1E57KED42219	Blythe Solar 4
Freightliner	HydroVac Truck	1FVACWFC7KHKU0882	Blythe Solar 4
Polaris	Ranger 4 seater	4XAT6E990L8000460	Blythe Solar 4