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3 Anaheim, California 92805
Tel.: (714) 765-5169
4 Email: tchen@anaheim.net

5 Attorney for Petitioner
CANYON POWER PLANT (CITY OF ANAHEIM)

7 **BEFORE THE HEARING BOARD OF THE**
8 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

9 **In the Matter of**

10 CANYON POWER PLANT (CITY OF
11 ANAHEIM)

12 [Facility ID No. 153992],

13 Petitioner

14 v.

15 SOUTH COAST AIR QUALITY
16 MANAGEMENT DISTRICT,

17 Respondent

Case No.: 6264-2

DECLARATION OF RON HOFFARD IN
SUPPORT OF CANYON POWER PLANT'S
PETITION FOR REGULAR VARIANCE

Hearing Date: March 26, 2026

Time: 9:30 a.m.

Place: South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

18 I, Ron Hoffard, declare as follows:

19 1. I am a Generation Plant Manager for the City of Anaheim ("Petitioner"), which
20 operates the Canyon Power Plant ("Facility"). If called as a witness, I could testify to the
21 following based on personal knowledge.

1 complete the repair, the contractor expected the turbine to be returned to service on May 30,
2 2026.

3 5. As of February 13, 2026, the estimated total cost of the repair communicated by
4 the repair contractor is over \$9 Million.

5 6. On or around Tuesday, March 3, 2026, the repair contractor informed me that the
6 Gas Turbine No. 1 estimated return date would be late June 2026.

7 7. On or around March 10, 2026, the repair contractor informed me during a meeting
8 that while repairs are on track, continued progress is conditioned on the availability of parts.
9 Specifically, the contractor requires a Stage 1 Nozzle, which the contractor expects to receive by
10 June 1, 2026.

11 8. In a weekly update dated March 10, 2026, the repair contractor's updated
12 schedule indicated that the turbine would be shipped to the Facility on June 29, 2026. (Attached
13 as **Exhibit D**.)

14 9. Due to the extended repair timeline shown in **Exhibit D**, Gas Turbine No. 1 will
15 not be at the Facility, will not be in operation, and will not produce emissions until the turbine is
16 installed and tested.

17 10. Because Gas Turbine No. 1 is expected to be returned in late June 2026, Petitioner
18 is unable to conduct Triennial Testing by March 31, 2026, in accordance with the Variance, and
19 is requesting a five-month extension to August 31, 2026, providing relief from the same District
20 Rules and from Condition D29.3 as applicable to Device No. D1, as previously granted in the
21 Variance. An extension to August 31, 2026, would allow time for the turbine to be repaired,
22 returned, scheduled for testing, tested, and for results to be provided to Respondent.

1 11. During the Variance's compliance period, and until the turbine is repaired, and
2 returned, and tested, Gas Turbine No. 1 has not produced and will not produce excess emissions.
3 In the absence of Gas Turbine No. 1, Petitioner will not be using any substitute turbine.

4 12. Although there is no action for the Facility and Facility staff to take that could
5 expedite compliance with Triennial Testing requirements while the turbine is in Canada with the
6 repair contractor, Petitioner is eager to have the turbine in operation as soon as possible and the
7 Facility agrees to comply with the requirements in the concurrently filed (Proposed) Findings
8 and Decision and Order when the turbine is returned and testing can be performed.

9
10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct. Executed this ^{12TH} day of March 2026, at Anaheim, California.

12
13
14 
15 _____
16 RON HOFFARD

EXHIBIT A

DECLARATION OF RON HOFFARD

2024 FINDINGS AND DECISION AND ORDER

1 **TERESA CHEN (SBN 254241)**
2 **DEPUTY CITY ATTORNEY**
3 **OFFICE OF THE CITY ATTORNEY**
4 **CITY OF ANAHEIM**
5 **200 SOUTH ANAHEIM BLVD., SUITE 356**
6 **ANAHEIM, CALIFORNIA 92805**
7 **TEL.: (714) 765-5169**
8 **EMAIL: TCHEN@ANAHEIM.NET**

9 **BEFORE THE HEARING BOARD OF THE**
10 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

11 **In the Matter of**

12 CANYON POWER PLANT (CITY OF
13 ANAHEIM)

14 [Facility ID No. 153992]

Case No.: 6264-1

**FINDINGS AND DECISION AND
ORDER GRANTING A REGULAR
VARIANCE**

Section 42350 of the California Health and
Safety Code

Hearing Date: October 3, 2024

18 **FINDINGS AND DECISION OF THE HEARING BOARD**

19
20 The Petition for a Regular Variance filed on August 20, 2024, by Canyon
21 Power Plant (City of Anaheim) was heard on October 3, 2024, pursuant to notice in
22 accordance with the provisions of California Health and Safety Code Section 40826.
23 The following members of the Hearing Board were present: Micah Ali, Chair; Robert
24 Pearman, Vice Chair; Jerry Abraham, MD, MPH, CMQ; Mohan Balagopalan; and
25 Cynthia Verdugo-Peralta. Petitioner Canyon Power Plant (City of Anaheim) was
26 represented by Teresa Chen, Deputy City Attorney; and Respondent, Executive
27 Officer of the South Coast Air Quality Management (South Coast AQMD), was
28 represented by Kathryn Roberts, Senior Deputy District Counsel. The public was

1 given the opportunity to testify. Evidence was received and the case submitted. The
2 Hearing Board finds and decides as follows:

3 **NATURE OF BUSINESS AND LOCATION OF FACILITY**

4 Canyon Power Plant (Facility ID No. 153992) is an operational 200-megawatt,
5 natural-gas-fired, simple-cycle power plant. Canyon Power Plant supplies electric
6 power to the City of Anaheim's Public Utilities Department, which serves electric
7 utilities customers in the City of Anaheim. The Facility has four (4) LM6000 gas
8 turbines that drive four (4) 50-megawatt generators. The Facility is located at 3071 E.
9 Mira Loma Avenue, Anaheim, California.

10 **EQUIPMENT THAT IS THE SUBJECT OF THE**
11 **REGULAR VARIANCE PETITION**

12 The equipment that is the subject of the Petition is Gas Turbine No. 1, which is
13 one of the four LM6000 gas turbines at the Facility.

14 **SUMMARY**

15 On June 21, 2024, one of the blades from Gas Turbine No. 1 broke off from the
16 rotor shaft and traveled through the compressor, combustor, and the hot section. The
17 liberated blade damaged components along the way. It also caused air flow turbulence
18 that resulted in extreme high-pressure air traveling in opposing directions, triggering a
19 compressor fault alarm and a compressor stall event which caused an emergency
20 turbine trip (shutdown). The following day, Petitioner conducted a borescope
21 inspection to determine the cause and inspect the damage.

22 Based on the initial inspection results, Petitioner estimated that 50% of all
23 compressor blades and vanes will need to be replaced, and that damage to the
24 combustor, fuel nozzles, and hot section blades will need to be repaired. The extent
25 and duration of necessary repairs will not be known until Petitioner's repair contractor
26 completes the teardown inspection of Gas Turbine No. 1. The inspection and repair
27 will occur at Petitioner's repair contractor's depot facility in Alberta, Canada.
28

1 Petitioner estimates that transportation, inspection, and repair of Gas Turbine No. 1
2 will take several months.

3 Gas Turbine No. 1 was scheduled for triennial testing in August 2024 pursuant
4 to Permit Condition D29.3. Because the blade liberation required the turbine to be
5 shut down on June 21, 2024, and because the turbine inspection and repair will not be
6 conducted at the Facility, Petitioner will not be able to comply with triennial testing
7 requirements until the turbine is repaired, returned, tested, and successfully started.
8 Therefore, without a Regular Variance, Petitioner is and will be in violation of Permit
9 Condition D29.3.

10 On October 3, 2024, the Hearing Board voted unanimously to grant Petitioner's
11 request for a Regular Variance, subject to the conditions mutually agreed upon by the
12 Parties and ordered by the Hearing Board as enumerated below. The Hearing Board
13 granted the Regular Variance with the amended compliance date of August 31, 2025
14 (originally June 30, 2025, as stated in the Petition) as requested by Petitioner at the
15 hearing.

16 **FINDINGS OF FACT AND CONCLUSIONS**

17 The following facts and conclusions support the Hearing Board making the
18 findings in Health and Safety Code Section 42352 in support of a Regular Variance.
19 The South Coast AQMD Executive Officer does not oppose the granting of the
20 Regular Variance.

21 **A. The petitioner for a variance is, or will be, in violation of Section 41701**
22 **or of any rule regulation or order of the District.**

23 Petitioner is in violation of District Rules 203(b), 2004(f)(1), and 3002(c)(1),
24 which require compliance with permit conditions because Petitioner is unable to meet
25 triennial testing requirements of Permit Condition D29.3.

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1 **B. Non-compliance with District Rules is due to conditions beyond the**
2 **petitioner's reasonable control.**

3 Although triennial testing as required by Permit Condition D29.3 was scheduled
4 for August 2024, Petitioner was, for reasons beyond Petitioner's reasonable control,
5 unable to conduct the testing as scheduled. Gas Turbine No. 1 and the liberated blade
6 are manufactured by General Electric (GE). GE's Service Bulletin recommends
7 replacement of blade rows (stages) 3 through 5 when a turbine reaches 1,500 starts.
8 On June 21, 2024, when the stage 3 blade broke in Gas Turbine No. 1, Gas Turbine
9 No. 1 had approximately 1,087 starts. Petitioner could not have reasonably anticipated
10 and prevented the violation resulting from the blade that was defective and required
11 replacement significantly sooner than the manufacturer's service bulletin indicated.

12 **C. Requiring compliance would result in either (1) an arbitrary or**
13 **unreasonable taking of property, or (2) the practical closing and**
14 **elimination of a lawful business.**

15 Because compliance with triennial testing requirements cannot be accomplished
16 without the physical and functional presence of Gas Turbine No. 1, denial of the
17 Regular Variance would cause an unreasonable burden on Petitioner's provision of
18 critical electric utility service to the community in the City of Anaheim. It would
19 cause significant, unreasonable, and unavoidable harm to Petitioner in that Petitioner
20 will be subject to fines and penalties for violations of its Permit and the above-
21 referenced Rules.

22 **D. The closing or taking would be without a corresponding benefit in**
23 **reducing air contaminants.**

24 Gas Turbine No. 1 will not be operational until the turbine is returned, tested,
25 and has a successful start after the turbine's inspection and repair is completed at the
26 Petitioner's repair contractor's depot facility in Canada. In the absence of Gas Turbine
27 No. 1, Petitioner will not be using any substitute turbine. Denying a Regular Variance
28 would result in significant harm to Petitioner without a corresponding benefit in air

1 contaminant reduction because the air contaminant reduction is already resulting from
2 the non-operative status of Gas Turbine No. 1.

3 **E. The applicant for the variance has given consideration to curtailing**
4 **operations of the source in lieu of obtaining a variance.**

5 Because the requested variance is for an administrative exception to triennial
6 testing requirements mandated by Permit Condition D29.3, curtailment of operations
7 at the Facility or of Gas Turbine No. 1 does not address compliance with testing
8 requirements. In addition, operations for Gas Turbine No. 1 will be suspended during
9 the variance period because the turbine will be transported, inspected, and repaired
10 offsite at the repair contractor's depot facility in Canada.

11 **F. During the period the variance is in effect, the applicant will reduce**
12 **excess emissions to the maximum extent feasible.**

13 Because Petitioner is not substituting Gas Turbine No. 1 while Gas Turbine No.
14 1 is non-operative during inspection and repair, emissions from Gas Turbine No. 1 are
15 already reduced to the maximum extent feasible. Petitioner's operation of the
16 remaining turbines at the Facility will be in compliance with the Facility Permit.

17 **G. During the period the variance is in effect, the applicant will monitor**
18 **or otherwise quantify emission levels from the source, if requested to**
19 **do so by the District, and report these emission levels to the district**
20 **pursuant to a schedule established by the District.**

21 As stated during the hearing, Petitioner acknowledges testing schedule
22 oversights and will monitor and report compliance pursuant to the Hearing Board's
23 order and the Facility Permit.

24 **CONCLUSION AND ORDER**

25 THEREFORE, the Hearing Board orders as follows:

- 26 1. The variance applies only to the portion of permit condition D29.3 stating the
27 "test shall be conducted at least one every three years," for the period
28

1 commencing October 3, 2024, and continuing until and including August 31,
2 2025. All other requirements in this condition shall remain in effect.

3 2. Petitioner shall notify the South Coast AQMD via email to AQ Engineer Chris
4 Perri (cperri@aqmd.gov), AQ Inspector II Avelino Revilla
5 (arevilla@aqmd.gov), and Supervising AQ Inspector Thomas Lee
6 (tlee2@aqmd.gov) of the following:

- 7 a. Completion of repairs to Turbine No. 1, within seven (7) days of
8 completion;
- 9 b. The return of repaired Turbine No. 1 to Canyon Power, within (7) seven
10 calendar days;
- 11 c. Date and time of initial start-up of the repaired Turbine No. 1, within
12 twenty-four (24) hours of start-up;
- 13 d. At least ten (10) calendar days prior to the source test, provide
14 notification of the date and time of the source test.

15 3. Petitioner shall conduct the triennial testing in accordance with permit condition
16 D29.3 within 90 days after first successful fire. Successful fire shall mean
17 operation that demonstrates compliance with all permit conditions, including
18 the NOx emission limit.

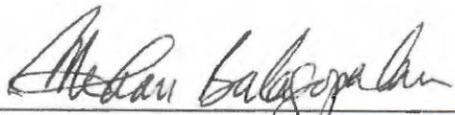
19 4. Petitioner shall notify South Coast AQMD by calling 1-800-CUT-SMOG and
20 by sending an email to AQ Inspector II Avelino Revilla (arevilla@aqmd.gov),
21 Supervising AQ Inspector Thomas Lee (tlee2@aqmd.gov), and AQ Engineer
22 Chris Perri (cperri@aqmd.gov) at least 24 hours prior to starting the Triennial
23 Source Test.

24 5. Petitioner shall submit a complete source test report showing preliminary
25 compliance with the Triennial Source Test conditions to South Coast AQMD
26 Source Testing (sourcetesting@aqmd.gov) and to AQ Inspector II Avelino
27 Revilla (arevilla@aqmd.gov), Supervising AQ Inspector Thomas Lee
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(tlee2@aqmd.gov), and AQ Engineer Chris Perri (cperri@aqmd.gov) within 45 calendar days after the test date.

- 6. Petitioner shall operate the Continuous Emissions Monitoring System (CEMS) to continuously monitor the exhaust from Turbine No. 1 (Device No. D1) and record all required parameters (i.e. NOx concentration, oxygen content, and fuel flow) pursuant to Rule 2012, Appendix A, Chapter 2 for the duration of the variance period including showing valid zeros for all parameters when the turbine is not operating. In lieu of the abovementioned requirement, the Petitioner may choose to comply with the requirements in Rule 2012(c)(2)(D) and 2012(c)(2)(E), as amended on November 3, 2022.
- 7. Petitioner shall pay all applicable fees to the Clerk of the Hearing Board, or the variance shall be invalidated pursuant to Rule 303(k), except for excess emissions fees, which shall be paid within fifteen (15) days of notification in writing that the fees are due, unless otherwise ordered by the Hearing Board.
- 8. Petitioner shall notify the Clerk of the Hearing Board at clerkofboard@aqmd.gov in writing when final compliance has been achieved.

FOR THE BOARD: 
Mohan Balagopalan

DATED: 12/24/24

PROOF OF SERVICE BY E-MAIL

Case No. 6264-1

I, the undersigned, declare that I am employed in the **County of Los Angeles, State of California**. I am over the age of eighteen years and am not a party to the within action. My business address is **21865 Copley Drive, Diamond Bar, California 91765**.

CALIFORNIA AIR RESOURCES BOARD variance@arb.ca.gov	
RON HOFFARD GENERAL PLANT MANAGER CANYON POWER PLANT rhoffard@anaheim.net	CESAR SANTANA PROJECT ENGINEER MONTROSE ENVIRONMENTAL SOLUTIONS, INC. cesarsantana@montrose-env.com

BY E-MAIL - By transmitting a true pdf copy of the **Findings and Decision** before the **Hearing Board** by e-mail transmission from mtabbada@aqmd.gov to each of the interested party at the e-mail addresses set forth above. Said transmission(s) were completed on the aforesaid date at the time stated on declarant's email transmission record.

I declare under penalty of perjury under the laws of the **State of California** that the foregoing is true and correct.

Executed on **December 31, 2024** at Diamond Bar, California.



Monica Tabbada
Office Assistant
Clerk of the Boards

EXHIBIT B

DECLARATION OF RON HOFFARD

2025 FINDINGS AND DECISION AND ORDER

EXHIBIT B - Declaration of Ron Hoffard

BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

CANYON POWER PLANT (CITY OF ANAHEIM)

[Facility ID No. 153992],

Section 42350 of the California Health and Safety Code

Case No.: 6264-2

FINDINGS AND DECISION AND ORDER GRANTING A REGULAR VARIANCE

Hearing Date: September 4, 2025

FINDINGS AND DECISION OF THE HEARING BOARD

The Petition for a Regular Variance filed on August 1, 2025, and amended on August 28, 2025, by Canyon Power Plant (City of Anaheim) was heard on the Consent Calendar on September 4, 2025, pursuant to notice in accordance with the provisions of California Health and Safety Code Section 40826. The following members of the Hearing Board were present: Micah Ali, Chair; Jerry P. Abraham, MD MPH CMQ; Mohan Balagopalan; and Cynthia Verdugo-Peralta.

Petitioner, Canyon Power Plant (City of Anaheim), did not appear. Respondent, Executive Officer of the South Coast Air Quality Management (South Coast AQMD), did not appear. The public was given the opportunity to testify. The joint Stipulation to Place Matter on Consent Calendar, the Declaration of Ron Hoffard, the Declaration of Elden Krause, and the [Proposed] Findings and Decision and Order of the Hearing Board were received as evidence, and the case was submitted.

The Hearing Board finds and decides as follows:

1 Because Petitioner could not complete the Triennial Testing in August 2024 as
2 planned while the turbine was inoperable and would be offsite for repair, Petitioner
3 filed a Petition for Regular Variance in August 2024 to avoid a violation of Permit
4 Condition D29.3. On October 3, 2024, the Hearing Board voted unanimously to grant
5 Petitioner's request for a Regular Variance. ("2024 Variance") The Hearing Board
6 granted the 2024 Variance a final compliance date of August 31, 2025.

7 The Hearing Board's Minute Order required Petitioner to file, by July 15, 2025,
8 a modification and extension of the 2024 Variance if Petitioner will be unable to
9 comply with the final compliance date. On or around July 11, 2025, and July
10 14, 2025, Petitioner learned it would not be able to comply with the 2024 Variance's
11 final compliance date because Petitioner was informed by the repair contractor that the
12 repair would take several more months. Petitioner did not have sufficient time to file a
13 modification and extension of the 2024 Variance by July 15, 2025, as directed by the
14 Minute Order.

15 On or around July 29, 2025, Petitioner confirmed with the Hearing Board Clerk
16 that the soonest hearing date would be September 4, 2025. On August 1, 2025,
17 Petitioner filed a new Petition for Regular Variance because Petitioner needed a
18 compliance date extension and modification to remain in compliance with Facility
19 Permit Condition D29.3, but the request would not be heard until September 4, 2025,
20 after the 2024 Variance's compliance date of August 31, 2025. The new Petition for
21 Regular Variance requests an extension of the compliance period starting
22 September 4, 2025, up to and including March 31, 2026, to allow time for the repair to
23 be completed, the turbine to be returned, testing to be scheduled and completed, and
24 required reporting to be submitted by Petitioner to Respondent.

1 **FINDINGS OF FACT AND CONCLUSIONS**

2 The following facts and conclusions support the Hearing Board making the
3 findings in Health and Safety Code Section 42352 in support of a Regular Variance.
4 The South Coast AQMD Executive Officer does not oppose the granting of the
5 Regular Variance.

6 **A. The Petitioner for a variance is, or will be, in violation of Section 41701**
7 **or of any rule regulation or order of the District.**

8 Petitioner is in violation of District Rules 203(b), 2004(f)(1), and 3002(c)(1),
9 which require compliance with permit conditions because, in the absence of a present
10 and operating turbine, Petitioner is unable to meet Triennial Testing requirements of
11 Facility Permit Condition D29.3. In addition, in the absence of the turbine, petitioner
12 is in violation of Rule 218(b)(4)(C), which requires annual Relative Accuracy Test
13 Audits (RATA).

14 **B. Non-compliance with District Rules is due to conditions beyond the**
15 **Petitioner's reasonable control.**

16 Although Triennial Testing as required by Permit Condition D29.3 was
17 scheduled for August 2024, Petitioner was, for reasons beyond Petitioner's reasonable
18 control, unable to conduct the testing as scheduled. Petitioner could not have
19 reasonably anticipated and prevented the violation resulting from the blade that was
20 defective and required replacement sooner than the manufacturer's service bulletin
21 indicated. In addition, Petitioner had no control over unpredictable tariffs and
22 import/export regulatory challenges or concerns, or control over supply chain issues
23 for materials that impacted the anticipated scope of repairs.

24 **C. Requiring compliance would result in either (1) an arbitrary or**
25 **unreasonable taking of property, or (2) the practical closing and**
26 **elimination of a lawful business.**
27

1 Because compliance with testing requirements cannot be accomplished without
2 the physical and functional presence of Gas Turbine No. 1, denial of the Regular
3 Variance would cause an unreasonable burden on Petitioner's provision of critical
4 electric utility service to the community in the City of Anaheim. It would cause
5 significant, unreasonable, and unavoidable harm to Petitioner in that Petitioner will be
6 subject to fines and penalties for violations of its Permit and the above-referenced
7 Rules, despite having no excess emissions in the absence of Gas Turbine No. 1.

8 **D. The closing or taking would be without a corresponding benefit in**
9 **reducing air contaminants.**

10 Gas Turbine No. 1 will not be operational until the turbine is returned, tested,
11 and has a successful start after the turbine's inspection and repair is completed at the
12 Petitioner's repair contractor's depot facility in Canada. In the absence of Gas Turbine
13 No. 1, Petitioner will not be using any substitute turbine. Denying a Regular Variance
14 would result in significant harm to Petitioner without a corresponding benefit in air
15 contaminant reduction because the air contaminant reduction is already resulting from
16 the non-operative status of Gas Turbine No. 1.

17 **E. The applicant for the variance has given consideration to curtailing**
18 **operations of the source in lieu of obtaining a variance.**

19 Because the requested variance is for an administrative exception to Triennial
20 Testing requirements mandated by Permit Condition D29.3 and annual RATA
21 requirements in Rule 218(b)(4)(C), curtailment of operations at the Facility or of Gas
22 Turbine No. 1 does not address compliance with testing requirements. In addition,
23 operations for Gas Turbine No. 1 will be suspended during the variance period
24 because the turbine will be transported, inspected, and repaired offsite at the repair
25 contractor's depot facility in Canada.

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- 1 b. The return of repaired Turbine No. 1 to Canyon Power, within (7) seven
2 calendar days
- 3 c. Date and time of initial start-up of the repaired Turbine No. 1, within
4 seventy-two (72) hours of start-up;
- 5 d. At least ten (10) calendar days prior to the source test, provide
6 notification of the date and time of the source test.
- 7 3. Petitioner shall conduct the Triennial Testing in accordance with permit
8 condition D29.3 within 90 days after first successful fire. Successful fire shall
9 mean operation that demonstrates compliance with all permit conditions,
10 including the NOx emission limit.
- 11 4. Petitioner shall notify South Coast AQMD by calling 1-800-CUT-SMOG and
12 by sending an email to AQ Inspector II Evan Landi (elandi@aqmd.gov),
13 Supervising AQ Inspector Joseph Liaw (jliaw1@aqmd.gov), and AQ Engineer
14 Chris Perri (cperri@aqmd.gov) at least twenty-four (24) hours prior to starting
15 the Triennial Source Test.
- 16 5. Petitioner shall submit a complete source test report showing preliminary
17 compliance with the Triennial Source Test to South Coast AQMD Source
18 Testing (sourcetesting@aqmd.gov) and to AQ Inspector II Evan Landi
19 (elandi@aqmd.gov), Supervising AQ Inspector Joseph Liaw
20 (jliaw1@aqmd.gov), and AQ Engineer Chris Perri (cperri@aqmd.gov) within
21 forty-five (45) calendar days after the test date.
- 22 6. Petitioner shall ensure that the NOx and CO CEMS serving Turbine No.1 is
23 operational at least twenty-four (24) hours prior to restart of equipment of
24 repaired Turbine No.1.
- 25 7. Petitioner shall perform a cylinder gas analysis on the NOx and CO monitor
26 offline prior to restarting the repaired Turbine No.1.
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- 8. Petitioner shall conduct a RATA and bias test for the NOx concentration monitor, stack gas flow rate system, and NOx mass emission rate measurement system within fourteen (14) operating days after initial startup of repaired Turbine No. 1.
- 9. Petitioner shall submit a complete permit application to reflect modifications to Turbine No. 1 within thirty (30) days of issuance of this variance.
- 10. Petitioner shall pay all applicable fees to the Clerk of the Hearing Board, or the variance shall be invalidated pursuant to Rule 303(k), except for excess emissions fees, which shall be paid within fifteen (15) days of notification in writing that the fees are due, unless otherwise ordered by the Hearing Board.
- 11. Petitioner shall notify the Clerk of the Hearing Board at clerkofboard@aqmd.gov in writing when final compliance has been achieved.

Board Member: *Mohan Balagopalan*
Mohan Balagopalan

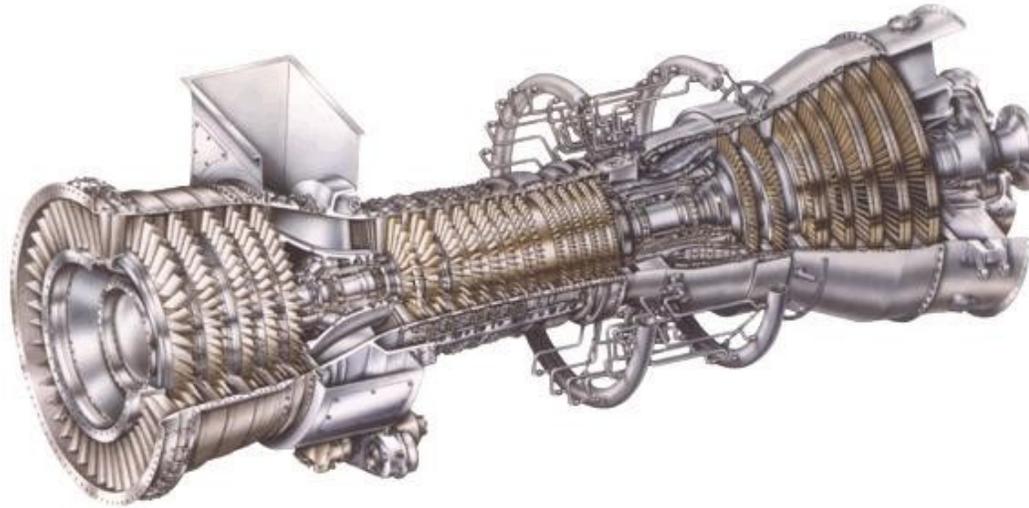
Dated: 7/11/25

EXHIBIT C

DECLARATION OF RON HOFFARD

January 23, 2026 Contractor's Update

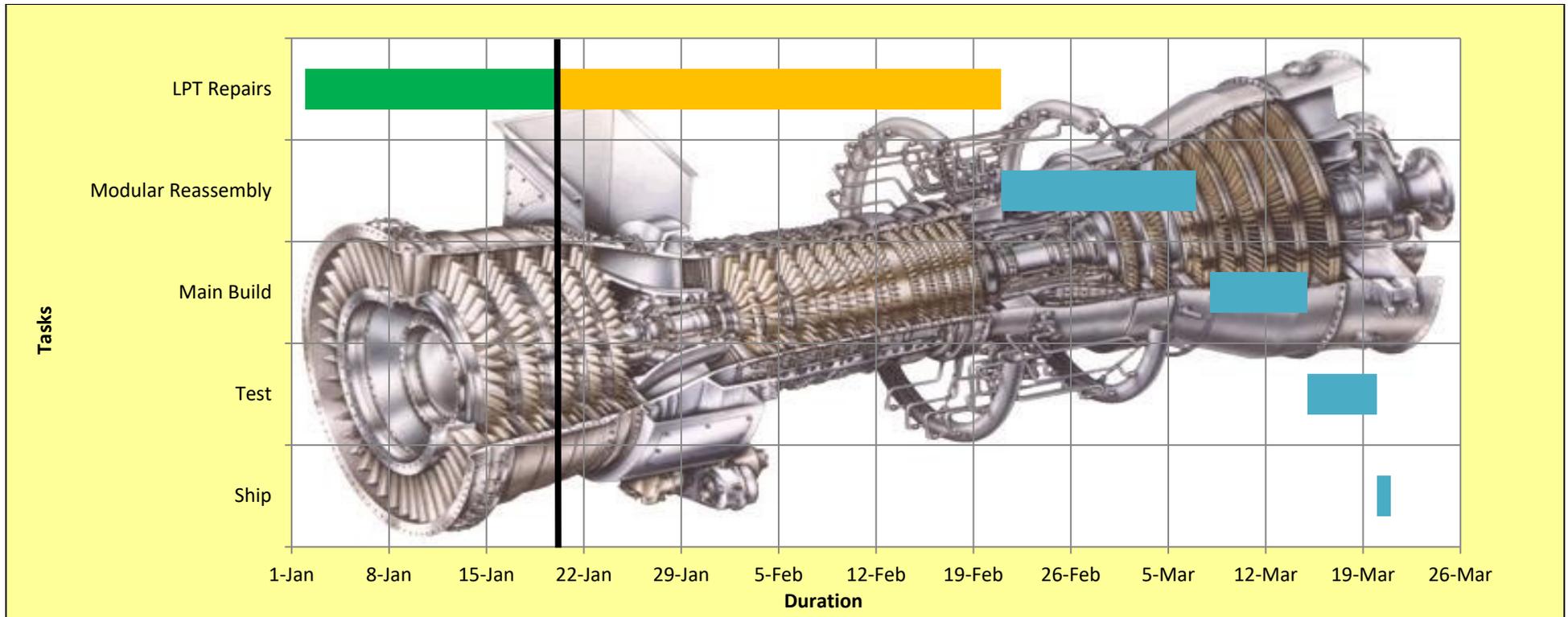
EXHIBIT C - Declaration of Ron Hoffard



ANAHEIM
PUBLIC UTILITIES

UPDATE
LM6000 PC
ESN 191-657

TCT SALES ORDER NUMBER: CA9007271
SUBMISSION DATE: 23 JANUARY 2026



Key	
Completed Tasks	
Tasks in Progress	
Future Tasks	
Delayed Tasks	

Tasks	Start Date	End Date	Duration
LPT Repairs	02-Jan-26	20-Feb-26	50
Modular Reassembly	21-Feb-26	07-Mar-26	14
Main Build	08-Mar-26	15-Mar-26	7
Test	15-Mar-26	20-Mar-26	5
Ship	20-Mar-26	20-Mar-26	1

Summary of Work

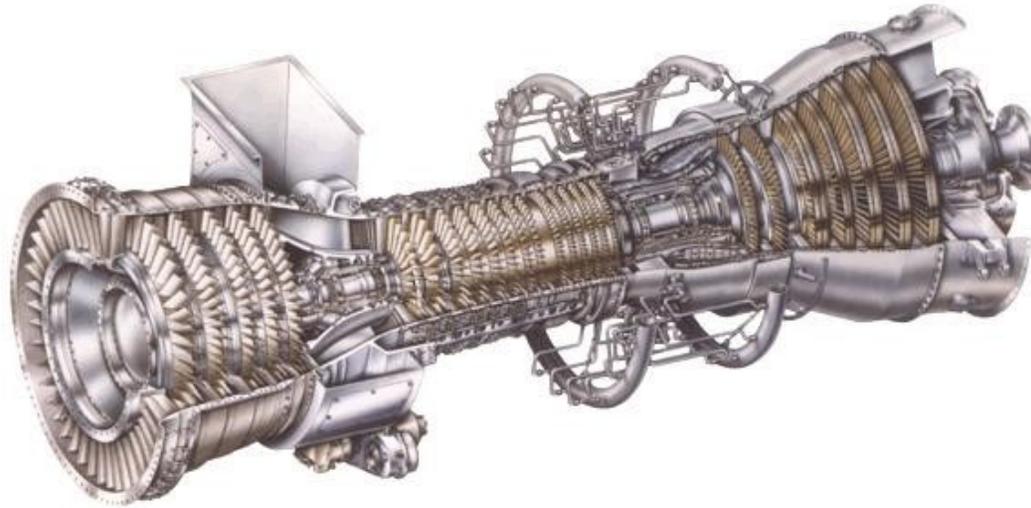
	Items Requiring Feedback	Action By	Decision Date	Hold
1				
2				
3				
4				
5				

Work To be Completed		Work Completed During Week		Work Completed To-Date	
1	Repair	1		1	Induction
2	Assembly	2		2	Bulk Strip
3	Main Build	3		3	Detail Strip
4	Test	4		4	Cleaning & Inspection
5	Ship	5		5	Depot Findings Report
6		6		6	
7		7		7	
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EXHIBIT D

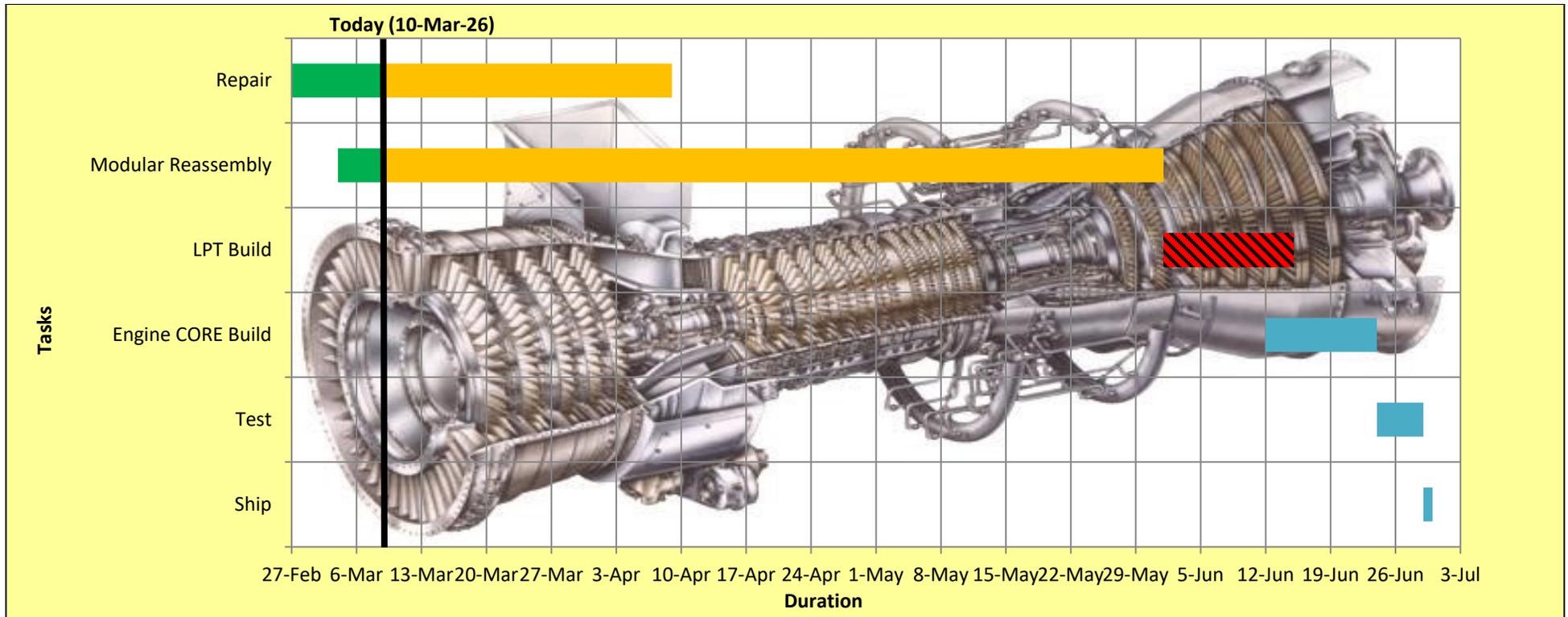
DECLARATION OF RON HOFFARD

March 10, 2026 Contractor's Update



**FINAL BUILD SCHEDULE
LM6000 PC
ESN 191-657**

TCT SALES ORDER NUMBER: CA9007271
SUBMISSION DATE: 10 MARCH 2026



Key	
Completed Tasks	
Tasks in Progress	
Future Tasks	
Delayed Tasks	

Tasks	Start Date	End Date	Duration
Repair	27-Feb-26	8-Apr-26	41
Modular Reassembly	4-Mar-26	1-Jun-26	89
Engine CORE Build	12-Jun-26	24-Jun-26	12
Test	24-Jun-26	29-Jun-26	5
Ship	29-Jun-26	29-Jun-26	1

Summary of Work

	Items Requiring Feedback	Action By	Decision Date	Hold
1				
2				
3				
4				
5				

Work To be Completed		Work Completed During Week		Work Completed To-Date	
1	Repair	1		1	
2	Assembly	2		2	
3	Main Build	3		3	
4	Test	4		4	
5	Ship	5		5	
6		6		6	
7		7		7	
8		8		8	
9		9		9	
10		10		10	
11		11		11	
12		12		12	
13		13		13	
14		14		14	
15		15		15	
16		16		16	
17		17		17	
18		18		18	
19		19		19	
20		20		20	

Additional Information**March 10: Current Anticipated Schedule**

- May 29: LPT Stage 2 Nozzle order fulfillment/ship date
- June 1: LPT module reassembly date
- June 24: Test date
- June 29: Engine dispatch date
- July 1: Arrival on site (Canyon Power Plant)
- Note there exists a risk that the LPT Nozzle order fulfillment date could see a delay of ~1-2 weeks
 - TCT working to determine firm receipt date to establish most accurate schedule possible