

RV 06/30/26

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SOUTH COAST AQMD
CLERK OF THE BOARDS

PETITIONER: CITY OF VERNON
Todd Dusenberry, General Manager
Vernon Public Utilities

CASE NO: 2026 MAY 21 P 3: 22
4957-8
FACILITY ID: 14502

FACILITY ADDRESS: 4990 Seville Avenue
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Vernon, California, 90058

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Lisa Umeda

Richard Corbi

Utilities Compliance Administrator

Assistant General Manager

4305 Santa Fe Avenue

4305 Santa Fe Avenue

Vernon, CA Zip 90058

Vernon, CA Zip 90058

(323) 583-8811 Ext. 561

(323) 583-8811 Ext. 390

Fax N/A

Fax N/A

E-mail lumeda@cityofvernonca.gov

E-mail rcorbi@cityofvernonca.gov

3. RECLAIM Permit Yes No Title V Permit Yes No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]



May 18, 2026

**RE: Notice of Intent to File a Petition for Both an Interim and Regular Variance for
Vernon Public Utilities, SCAQMD Facility ID 14502**

Dear Sir or Ma'am:

Attached is a petition for both an interim and regular variance for Vernon Public Utilities (VPU), Facility ID 14502. VPU is seeking this variance to allow operation of its natural gas-fired peaking units (Device IDs D1 and D2) at a water-to-fuel ratio that differs from what is currently allowed by Condition No. C10.1 of the facility's Title V Permit. VPU requests that the period for this variance extend through the South Coast Air Quality Management District's (SCAQMD) review and approval of a forthcoming Title V Permit Modification Application to formally revise Condition No. C10.1. Additional details regarding the need for this variance are provided within the petition itself.

Check No. 616479 for \$2,042.38 is included with this petition to cover the filing fees specified in Table III, Schedule B of Rule 303 for a Regular (with Interim) Variance.

We look forward to working with SCAQMD's Hearing Board on this important matter. Please contact Lisa Umeda at (323) 583-8811 ext. 561 (email address: lumeda@cityofvernonca.gov) or Elyse Engel at (702) 354-2648 (email address: Elyse.Engel@jacobs.com) if you have any questions or need additional information prior to scheduling the hearing date.

Sincerely,

Todd Dusenberry
General Manager of Vernon Public Utilities

cc: Lisa Umeda & Elyse Engel

Enc: Petition for Variance (1 Original + 8 Copies)
Check No. 616479

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Vernon Public Utilities (VPU) is requesting that the South Coast Air Quality Management District (SCAQMD) grant an interim variance for Facility ID 14502 to support the reliable operation of the electric grid during the upcoming summer demand and emergency conditions.

VPU owns and operates two natural gas-fired turbine generators (Units D1 and D2, both Allison Model 571-KA with water injection) under SCAQMD Facility ID 14502, with a total power output of 10-megawatts (MW). These units, commonly referred to as the H. Gonzales Units (HG Units), are peaker units operated under conditions qualifying for the SCAQMD Rule 1135 low use exemption.

The HG Units are used to meet local resource adequacy (RA) in the California Independent System Operator (CAISO), which manages the flow of electricity through transmission lines across California and part of Nevada. As a North American Electric Reliability Corporation (NERC)-registered Reliability Coordinator and Balancing Authority, CAISO uses long-term, short-term, and real-time strategies as detailed in their Operating Procedures to plan and schedule resources for grid reliability. Accordingly, CAISO dispatches VPU's HG Units primarily during peak demand or emergency conditions, frequently during the hot summer months of July and August when high loads and wildfire risks threaten infrastructure, causing unscheduled outages of generation and transmission throughout the California grid. When situations like these arise, CAISO issues emergency notifications with increasing urgency, starting with the Flex Alert, a voluntary call for energy, to Energy Emergency Alert 3 (EEA 3) declarations, which may require rotating power outages to preserve statewide system reliability.

Although VPU is no longer a registered NERC entity, VPU remains subject to CAISO's reliability procedures as a Metered Subsystem (MSS) and Load Serving Entity (LSE), as detailed in both the Interconnection Agreement and Tariff.

Under CAISO Tariff Section 40, VPU is required to submit monthly Supply Plans demonstrating sufficient local capacity in the prior month. The T-45 timeline is a critical regulatory milestone for these submissions, allowing CAISO to validate qualifying capacity, identify and remedy deficiencies, and assess transmission-constrained reliability needs. This process ensures system-wide stability while minimizing the need for costly Backstop Procurement through the Capacity Procurement Mechanism (CPM).

Furthermore, the HG Units are used to support VPU's black start capability (i.e., the facility's ability to start-up within 15 minutes and deliver electricity immediately to the California grid independently, without relying on any external power transmission network during a total or partial shutdown), which supports local stability by enabling VPU to restore power to its critical infrastructure and operate independently during severe system disturbances or emergency conditions.

During compliance year 2024 – 2025, the HG Units produced a total of 170.37 pounds (lbs) of nitrogen oxides (NO_x) emissions, and only 153.75 lbs of NO_x emissions in compliance year 2023 – 2024. Despite their relative low use, the availability of these 10-MW HG Units is critical for grid stability both locally and on the CAISO grid.

For the reasons provided above, approval of an interim variance is needed to allow VPU to submit a timely Supply Plan to CAISO 45 days before July 1, 2026 (or by May 17, 2026) that includes the HG Units during the hot summer months of July and August. Waiting for a 45-day public notice period plus time for administrative coordination would compromise VPU's ability to provide grid stability during these critical months. However, as described in more detail within this petition, VPU does intend to limit operation of the HG Units to the extent feasible until approval of a regular variance is received.

5. Briefly describe the type of business and processes at your facility

VPU has been operating an electric power generating facility (Station "A") since 1933 in the City of Vernon. The facility consists of the Johnson & Heinze Diesel Plant and H. Gonzales Generating Station. The facility

operates under a Title V Permit issued by the SCAQMD, Facility ID 14502, and is subject to the Regional Clean Air Incentives Market (RECLAIM) Program for NO_x. As described in the response to Item No. 4 above, Units D1 and D2, natural gas-fired peaking units, are operated infrequently to provide power to the electricity grid during periods of peak demand. Unit D25, a diesel-fired emergency generator, is tested monthly.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Gas Turbine, Peaking Unit	638452	D1	N/A
Gas Turbine, Peaking Unit	638453	D2	N/A

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

Units D1 and D2 are natural gas-fired peaking units equipped with water injection to control NO_x emissions. As described in more detail in the response to Item No. 4 above, operation of Units D1 and D2 is critical to providing grid stability during hot summer months of July and August when high loads and wildfire risks threaten infrastructure, causing unscheduled outages of generation and transmission.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No
 If yes, how often: Annually Date of last maintenance and/or inspection May 31, 2025

Describe the maintenance and/or inspection that was performed.

Annual maintenance was performed on both Units D1 and D2 on May 31, 2025. A list of activities conducted during the maintenance is provided below. Additional details are provided in the attached reports.

- The need for turbine repairs or replacements was assessed based on annual run hours and the number of starts since the previous maintenance.
- The units were physically inspected.
- Shutdown tests were performed.
- Turbine Control System Digital (TCSD) system health checks were performed.
- Pre-running checks were performed.
- Running tests were performed.
- Unit stopping tests were performed.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Rule 2004(f)(1) [Condition No. C10.1 of Facility Permit to Operate]	To maintain compliance with the NO _x and carbon monoxide (CO) concentration limits of 27 parts per million (ppm) and 248 ppm, respectively, Units D1 and D2 must be operated at a water-to-fuel ratio outside the permitted range of 0.71 to 0.77 when operating on natural gas.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

VPU currently uses two means to demonstrate emissions compliance for Units D1 and D2, as follows:

- Conduct 5-year source testing to demonstrate compliance with the NO_x and CO concentration limits of 27 ppm and 248 ppm, respectively, shown in Section D of the facility's Title V Permit.
- Maintain the water-to-fuel ratio of the water injection system between 0.71 and 0.77 when the turbines are operating on natural gas, except during periods of startup and shutdown, as specified in Condition No. C10.1 of the facility's Title V Permit.

Historically, maintaining the water-to-fuel ratio within the permitted range has aligned with the permitted NO_x and CO concentration limits. However, recent equipment tuning following improvements to the non-permitted water injection components has demonstrated that Units D1 and D2 comply with the NO_x and CO concentration limits at notably lower water-to-fuel ratios.

Therefore, while VPU can operate Units D1 and D2 at the water-to-fuel ratio specified in Condition No. C10.1, doing so would likely result in emissions above the permitted NO_x and CO concentration limits. To avoid excess emissions during operation, VPU would instead like to maintain the water-to-fuel ratio outside of the permitted range.

The events that led to this determination are described in more detail in the response to Item No. 15 below.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

VPU previously understood that a Continuous Emissions Monitoring System (CEMS) would need to be installed by July 1, 2026 to allow continued operation of Units D1 and D2 under SCAQMD Rule 1135. In preparation of the anticipated requirement, VPU made improvements to the non-permitted water injection components to enhance control of water flow and, by extension, emissions performance. These improvements were completed in July 2025 for Unit D1 and in February 2026 for Unit D2.

Following these improvements, equipment tuning was performed to confirm the water-to-fuel ratio setpoints aligned with the permitted NO_x and CO concentration limits. Preliminary tuning was performed on Unit D1 in July 2025 with inconclusive results. More robust tuning was performed on both Units D1 and D2 in March 2026, following completion of the Unit D2 improvements.

During the March 2026 equipment tuning, each unit was run at maximum load with NO_x and CO concentrations determined using SCAQMD Method 100.1. Results from this tuning indicate that compliance with the permitted NO_x and CO concentration limits is achieved at lower water-to-fuel ratios than the permitted range of 0.71 to 0.77.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

Key dates and actions related to this petition for a variance, inclusive of actions identified in the response to Item No. 15 above, are as follows:

- In July 2025, VPU made improvements to the non-permitted water injection components of Unit D1 and conducted subsequent equipment tuning.
- On September 23, 2025, VPU contacted SCAQMD's Philip Nguyen and Li Chen to inquire about the requirement for a CEMS under SCAQMD Rule 1135.
- SCAQMD responded to the above inquiry on October 1, 2025.
- On October 7, 2025, VPU met virtually with SCAQMD's Philip Nguyen, Li Chen, and Osiris Torres to clarify that a CEMS would not be required for Units D1 and D2 until the facility becomes a Former RECLAIM facility.
- On December 10, 2025, VPU contacted SCAQMD's Philip Nguyen, Li Chen, and Osiris Torres to understand SCAQMD's willingness to adjust the water-to-fuel ratio range of Condition No. C10.1 and obtain clarification on the forms and documentation required to support the proposed, modified range.
- SCAQMD responded to the above inquiry on December 16, 2025.
- In February 2026, VPU made improvements to the non-permitted water injection components of Unit D2.
- In March 2026, equipment tuning was performed for both Units D1 and D2.
- In April 2026, VPU reviewed the equipment tuning data to determine what new water-to-fuel ratio range would align with the permitted NO_x and CO concentration limits.
- Presently, in May 2026, VPU is filing this petition for a variance and concurrently preparing a Title V Permit Modification Application to formally adjust the water-to-fuel ratio range of Condition No. C10.1.

Note that Units D1 and D2 have remained offline since July 2025 except for equipment tuning.

17. What would be the harm to your business during and/or after the period of the variance if the variance were not granted?

Economic losses: \$ 57,500 per month

Number of employees laid off (if any): _____

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

VPU is required to submit monthly Supply Plans the CAISO 45 days prior demonstrating sufficient local capacity. The HG Units are included in the CAISO Supply Plan for the month of July. 45 days before July 1st date was May 17, 2026, and the HG units will be unable to be operated if there are delays in the permit variation.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

Although Units D1 and D2 can remain offline until the facility's Title V Permit is formally modified, doing so would compromise stability of the electric grid during hot summer months, as specified in the response to Item No. 4 above, and financially harm the business, as specified in the response to Item No. 17 above. VPU requests that a variance be granted to allow intermittent operation of Units D1 and D2 without the generation of excess emissions while the Title V Permit Modification Application is prepared and reviewed by SCAQMD.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A			

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

As stated in the response to Item No. 15 above, results from the March 2026 equipment tuning indicate that compliance with the permitted NO_x and CO concentration limits using the recently improved water injection components of Units D1 and D2 is achieved at lower water-to-fuel ratios than the 0.71 to 0.77 range specified in Condition No. C10.1 of the facility's Title V Permit. Therefore, VPU is filing this petition for a variance with the sole purpose of avoiding excess NO_x and CO emissions by allowing operation of Units D1 and D2 at a water-to-fuel ratio outside of the permitted range while providing grid stability during the upcoming hot summer months. In other words, there will be no excess emissions with approval of this petition for a variance.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

VPU is filing this petition for a variance with the sole purpose of avoiding excess NO_x and CO emissions following improvements to the non-permitted water injection components of Units D1 and D2. Excess emissions will be avoided during the variance period by operating Units D1 and D2 at a water-to-fuel ratio outside of the 0.71 to 0.77 range specified in Condition No. C10.1 of the facility's Title V Permit. Specifically, based on the March 2026 equipment tuning results, maintaining a water-to-fuel ratio between 0.61 and 0.67 will assure compliance with the permitted NO_x and CO concentration limits. The equipment tuning results and associated monitoring data are attached with this petition.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Data collected during the March 2026 equipment tuning, provided with the response to Item No. 21 above, demonstrates that NO_x and CO emission levels (as concentrations) are met when the water-to-fuel ratio is maintained within the range of 0.61 to 0.67. As such, actual emissions levels will not be monitored during the variance period.

Rather, during the variance period, VPU will monitor the gas fuel flow, water injection flow, and water-to-fuel ratio setpoint, consistent with its current monitoring requirements. Together, these data will be used to demonstrate compliance with the water-to-fuel ratio during unit operations. Based on the tuning results, operation at the appropriate water-to-fuel ratio corresponds to operation in compliance with the NO_x and CO concentration limits. A log with these monitored and calculated data points can be provided at the request of the SCAQMD for any runs enacted during the variance period.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

VPU is currently preparing a Title V Permit Modification Application to formally modify Condition No. C10.1 to align with the lower water-to-fuel ratio range specified in the response to Item No. 21 above. Compliance will be achieved once SCAQMD approves the application and issues a revised Title V Permit.

24. State the date you are requesting the variance to begin: 07/01/2026; and the date by which you expect to achieve final compliance: 07/01/2027 or date on which SCAQMD issues a revised Title V Permit, whichever is later.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

Although it is VPU's hope that this regular variance will not need to extend beyond the duration of one year, it will ultimately depend on the length of time needed for SCAQMD to review and approve the forthcoming Title V Permit Modification Application. As such, the following schedule of increments of progress is provided:

- Title V Permit Modification Application will be submitted to the SCAQMD by June 30, 2026.
- SCAQMD will make a completeness determination within 30 days of receipt of the application.
- SCAQMD will approve the application within 90 days of its completeness determination, assuming the revision is treated as a minor permit revision.

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

<u>Philip Nguyen</u>	<u>Ext. (909) 396-2722</u>
<u>Li Chen</u>	<u>Ext. (909) 396-2426</u>
<u>Osiris Torres</u>	<u>Ext. (909) 396-2415</u>

26. If the petition was completed by someone other than the petitioner, please provide their name and title below.

<u>Elyse Engel</u>	<u>Jacobs Engineering Group, Inc.</u>	<u>Air Quality Specialist</u>
Name	Company	Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 5/21/2026, at Vernon, California

Signature  _____
Print Name Todd Dusenberry

Title: General Manager of Vernon Public Utilities

THIS SECTION IS FOR SMALL BUSINESSES ONLY

27. **SMALL BUSINESS ELIGIBILITY and TABLE III SCHEDULE A FEES:** To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration For Reduced Fee Eligibility

1. The petitioner is
 - a) an individual, or
 - b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is

a) a business that meets the following definition of Small Business as set forth in District Rule 102:

SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

- (a) the number of employees is 10 or less; **AND**
- (b) the total gross annual receipts are \$500,000 or less or
- (iii) the facility is a not-for-profit training center.

-OR-

b) an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, at _____, California

Signature

Print Name

Title

ATTACHMENT A

ITEM 1

Type of Variance Requested:

- (a) **SHORT:** If compliance with District rule(s) can be achieved in 90 days or less, request a short variance. *(Hearing will be held approximately 21 days from date of filing--10-day posted notice required.)*
- (b) **REGULAR:** If compliance with District rule(s) will take more than 90 days, request a regular variance. If the variance request will extend beyond one year, you must include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. *(Hearing will be held approximately 45 days from date of filing--30-day published notice required.)*
- (c) **EMERGENCY:** If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an *ex parte* emergency variance in addition to an emergency variance. **An emergency variance cannot be granted for more than 30 days.** *(Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.) If you request an emergency variance, you must answer No. 4 on page 1.*
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an *ex parte* emergency variance. An *ex parte* emergency variance will be granted or denied solely on the information contained in the petition and the District's response to the petition. Under most circumstances, an *ex parte* emergency variance will remain in effect only until a hearing can be held. **If you request an *ex parte* variance, you must answer No. 4 on page 1.**
- (e) **INTERIM:** If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held, request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. *(Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.) If you request an interim variance, you must answer No. 4 on page 1.*

ITEM 4

GOOD CAUSE: The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, *Ex Parte* Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

ITEM 6

Example #1:

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

ITEM 9

a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.

b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) - Temporary Permit to Operate; 203(b) - Permit to Operate; 2004(f)(1) – RECLAIM Permit; 3002(c) – Title V Permit.

Example #2:

Rule	Explanation
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 0999999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

ITEM 24

Example #3:

Sample Schedule of Increments of Progress

- Permit application(s) will be submitted to the District by [date].
- Contracts for the purchase of emission control systems will be awarded by [date].
- On-site construction will be completed by [date].

(Petition for Variance: Revised February 22, 2011)

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

English	"If you require a language interpreter in order to participate in the hearing, contact the Clerk of the Board at least five (5) calendar days before your hearing at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov . Specify the case name and number, hearing date, and the language for which you are requesting an interpreter."
Farsi	"اگر برای شرکت در جلسه استماع به مترجم نیاز دارید، حد اقل پنج (5) روز تقویمی قبل از جلسه استماع، با منشی هیئت توسط شماره تلفن 909-396-2500 یا بوسیله نامه الکترونیکی با نشانی clerkofboard@aqmd.gov تماس بگیرید. نام پرونده و شماره آن، تاریخ جلسه استماع و زبانی را که برای آن مترجم درخواست کرده اید، مشخص کنید"
Arabic	"إذا كنت في حاجة لمترجم من أجل المشاركة في جلسة الاستماع، اتصل بكتاب المحكمة قبل موعد جلسة الاستماع بخمسة (5) أيام على هاتف 2500-396-909. حدد اسم ورقم القضية و تاريخ الاستماع واللغة التي تريد في clerkofboard@aqmd.gov 909-396-909 أو بالبريد الإلكتروني على مترجم لها."
Armenian	"Մեկնորոշումն մասնակցելու համար, եթե թարգմանչի կարիք ունենաք, ցածրագ ձեր ունկնորոշումը, ամենաքիչն հինգ (5) օրացույցային օրից առաջ կապվեք համաձայն՝ բարտուղարի հետ, 909-396-2500 հեռախոսահամարով կամ էլեկտրոնային հասցեով clerkofboard@aqmd.gov ։ Նշեք գործի անունն և համարը, ունկնորոշում թվականը, և լեզուն, որի համար թարգմանչի եք ցանկանում"
Vietnamese	"Nếu quý vị cần Thông Dịch Viên cho buổi điều trần, xin vui lòng điện-thoại cho Thư Ký Hội Đồng tại số 909-396-2500 trễ nhất là năm [5] ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi điều trần hoặc gửi điện thư đến clerkofboard@aqmd.gov . Nhớ ghi rõ tên và số hồ sơ, ngày điều trần, và ngôn ngữ quý vị cần có người để thông dịch."
Chinese	如果你要求翻譯來協助你參加聽證會，請在你的聽證會前至少提前五天（5個日曆日）打電話到909-396-2500或發電子郵件到 clerkofboard@aqmd.gov 與局裏的辦事人員聯絡。並且明確說明你的案子的名稱和號碼，聽證日期，以及你要求的翻譯的語種。
Japanese	公聴会（ヒアリング）に参加するために通訳が必要な場合、少なくとも5日前までに事務局（Clerk of the Board）にご連絡ください。電話でのご連絡は909-396-2500、e-メールでのご連絡は clerkofboard@aqmd.gov までお願いします。その際、案件名（case name）と案件番号（case number）、ヒアリングの日付、通訳が必要な言語を特定して下さい。
Korean	"만약 귀하나 귀하의 증인들이 심리에 참여하기 위해 통역사가 필요하시면, 심리일 5일 전까지 기관부서의 서기에게 909-396-2500으로 연락하시거나, clerkofboard@aqmd.gov 로 연락 하십시오. 통역이 필요하신 사건의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해 주십시오."
Spanish	Si usted requiere un intérprete para poder participar en la audiencia, favor de comunicarse con el Secretario de la Junta cuando menos cinco (5) días hábiles antes de su audiencia al teléfono (909) 396-2500 ó por correo electrónico al clerkofboard@aqmd.gov . Especifique el nombre y el número de su causa, la fecha de la audiencia y el idioma del cual está solicitando el intérprete.
Tagalog	"Kung kailangan ninyo nang interpreter sa Pilipino para makasali kayo sa pagdinig sa kaso, tumawag lang po kayo sa Clerk of the Board sa numero 909-396-2500 or kung hindi mag-email kayo sa email clerkofboard@aqmd.gov . Kailangan na tumawag kayo sa loob nang limang araw (5 days) bago ang inyong hearing date at ibigay and inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may languahe na interpreter"
Thai	หากคุณต้องการล่ามในการขึ้นศาล ให้ติดต่อกับเจ้าหน้าที่ สำนักงานอย่างน้อย 5 วันก่อนวันขึ้นศาล โดยติดต่อกับเบอร์โทร 909-396-2500 หรือโดย e-mail ที่



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Title Page
Facility ID: 014502
Revision #: 49
Date: July 01, 2024

FACILITY PERMIT TO OPERATE

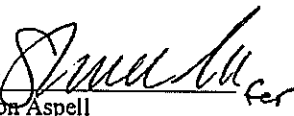
VERNON PUBLIC UTILITIES
4990 SEVILLE AVE
VERNON, CA 90058

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHGRIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Nastri
Executive Officer

By 
Jason Aspell
Deputy Executive Officer
Engineering and Permitting



**FACILITY PERMIT TO OPERATE
 VERNON PUBLIC UTILITIES**

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: VERNON PUBLIC UTILITIES

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 4990 SEVILLE AVE
 VERNON, CA 90058-2901

MAILING ADDRESS: 4305 SANTA FE AVE
 VERNON, CA 90058

RESPONSIBLE OFFICIAL: ABRAHAM ALEMU

TITLE: GENERAL MANAGER

TELEPHONE NUMBER: (323) 583-8811

CONTACT PERSON: LISA UMEDA

TITLE: UTILITIES COMPLIANCE ADMINISTRATOR

TELEPHONE NUMBER: (323) 583-8811

TITLE V PERMIT ISSUED: August 09, 2022

TITLE V PERMIT EXPIRATION DATE: August 08, 2027

TITLE V		RECLAIM	
YES	NOx:	YES	
	SOx:	NO	
	CYCLE:	2	
	ZONE:	COASTAL	



**FACILITY PERMIT TO OPERATE
VERNON PUBLIC UTILITIES**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
System 1: ELECTRIC GENERATION, GAS TURBINE					
GAS TURBINE, NO. 6, PEAKING UNIT, SIMPLE-CYCLE, FUEL OIL NO. 2, NATURAL GAS, ALLISON, MODEL 571-KA, WITH WATER INJECTION, 69.12 MMBTU/HR WITH A/N: 638452	DI		NOX: PROCESS UNIT**	CO: 150 PPMV FUEL OIL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 248 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 20.06 LBS/1000 GAL FUEL OIL 2 (1) [RULE 2012, 2-5-2016]; NOX: 27 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; NOX: 91.09 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 2-5-2016]; NOX: 213 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 2-27-2014]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SO2: 150 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 2-27-2014]; SO2: 500 PPMV FUEL OIL (5) [RULE 407, 4-2-1982]	A63.1, A99.1, A99.2, A99.5, C1.1, C1.2, C1.6, C10.1, D29.4, E51.1, E193.2, E193.3, H23.1
GENERATOR, NO. 6, 6000 KW					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
VERNON PUBLIC UTILITIES**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: INTERNAL COMBUSTION					
GAS TURBINE, NO. 7, PEAKING UNIT, SIMPLE-CYCLE, FUEL OIL NO. 2, NATURAL GAS, ALLISON, MODEL 571-KA, WITH WATER INJECTION, 69.12 MMBTU/HR WITH A/N: 638453	D2		NOX: PROCESS UNIT**	CO: 150 PPMV FUEL OIL (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 248 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 20.06 LBS/1000 GAL FUEL OIL 2 (1) [RULE 2012, 2-5-2016]; NOX: 27 PPMV NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; NOX: 91.09 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 2-5-2016]; NOX: 213 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 2-27-2014]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SO2: 150 PPMV NATURAL GAS (8) [40CFR 60 Subpart GG, 2-27-2014]; SO2: 500 PPMV FUEL OIL (5) [RULE 407, 4-2-1982]	A63.1, A99.1, A99.2, A99.5, C1.1, C1.2, C1.6, C10.1, D29.4, E51.1, E193.2, E193.3, H23.1
System 2: ELECTRIC GENERATION, EMERGENCY INTERNAL COMBUSTION ENGINE					
GENERATOR, NO. 7, 6000 KW					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE VERNON PUBLIC UTILITIES

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

For the purpose of this condition, load shall be defined as maximum continuous load, except during periods of start-up.

For the purpose of this condition, load shall be defined as maximum continuous load, except during periods of shutdown.

For the purpose of this condition, load shall be defined as maximum continuous load, except when performance tests are being conducted, not to exceed two hours per month.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D1, D2]

C10.1 The operator shall use this equipment in such a manner that the water-to-fuel ratio being monitored, as indicated below, is maintained between 0.71 and 0.77 to 1 ratio.

This condition shall only apply when the gas turbine is operating on natural gas.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the water-to-fuel ratio in the gas turbine.

The operator shall automatically regulate the water injection system by a fully modulated control system.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D1, D2]

D. Monitoring/Testing Requirements

D12.2 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.



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West Chester PA 19382
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*Design-Build-Commissioning-O&M of Electrical, Mechanical,
Automation and I&C Systems for Industry*

Allison 571 Turbine

Annual Test Report

City of Vernon

HG Unit 1

May 31, 2025

Below is a summary of the annual test activities for Unit 1 located at the City of Vernon Station A, during May, 2025.

Annual Test Summary:

Running hours since last test were minimal, no turbine repairs or replacements required at this time based on running hour schedules. Number of starts also do not increase equivalent running hours since last check. Proceeded with inspection and shutdown / run testing only. All shutdowns are functional, no serious leaks found.

Recommendations:

- a. Continue current practice of daily inspections.

1. Physical Inspection HG1

- a. Lube Oil System – Lube oil and both filters replaced.
- b. Oil levels OK. Tank Level Transmitter LT130, zero-span 0-100%, 0-30" H2O. SG correction for oil = .95 = 0-31.57" oil. Reservoir Lo Tap = 17.1%. LO AL = 40% HI HI shutdown = 100%.
- c. Pump Operation – Scavenge and Aux pump running, good pressure, filter DP OK.
- d. Water System – pump test OK.
- e. Control Air System – Pressure good, Regulator OK.
- f. Starting Air Panel – regulator OK.
- g. Air inlet – OK
- h. Evap Cooler – OK
- i. Inlet Filter Housing – OK, operational.
- j. Ventilation Fans – OK, filters clean.
- k. Exhaust Ducting – OK

2. Shutdown Test (check for lockout relay and fuel valves shut and fuel vent open)

- a. E-Stop – Local and CCR – OK
- b. Low oil pressure (pre-lube, start and running setpoints checked)– OK
- c. High Gas Pressure – OK
- d. Low Gas Pressure – OK
- e. Low Control Air Pressure – OK
- f. MGT Start temp High – OK
- g. MGT Running temp High – OK
- h. RTB high temp – OK, This is now redundant RTD
- i. Fire Alarm – OK
- j. Bearing High Temperature S/D – OK
- k. Gen HV compartment S/D - OK
- l. Stator winding High Temp S/D - OK

- m. Engine Vibration – OK
- n. Compressor Vibration – OK
- o. Overload – Setpoint verified
- p. Gen and Engine Enclosure High Temp S/D - OK

3. TCSD system health check

- a. Power supply – OK
- b. Speed sensor checked for both signal integrity and open circuit shutdown – OK

4. Pre-Running Checks

- a. Motored engine – OK, Starter OK

5. Running test

- a. Purge run – OK
- b. Ignitors – OK
- c. Start Ramp - OK
- d. Bleeds OPEN – OK
- e. Power turbine – OK
- f. Excitation ON – OK and good ramping
- g. Synchronize and load to 2 MW – Water injection on unit stable
- h. Vibration, pressures, RTB temperature – OK
- i. Load stable

6. Unit Stopping

- a. Units ramp down to 300 KW and open breaker - OK
- b. Units stay at idle for 5 minutes or more cooldown – OK
- c. Fuel cutoff unit coasts down – OK
- d. Aux lube oil pump on during coast down – Yes
- e. Post lube for 30 minutes – OK

Test : _____
Mark Wray

Date: May 31, 2025



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*Design-Build-Commissioning-O&M of Electrical, Mechanical,
Automation and I&C Systems for Industry*

Allison 571 Turbine

Annual Test Report

City of Vernon

HG Unit 2

May 31, 2025

Below is a summary of the annual test activities for Unit 2 located at the City of Vernon Station A, during May, 2025.

Annual Test Summary:

Running hours since last test were minimal, no turbine repairs or replacements required at this time based on running hour schedules. Number of starts also do not increase equivalent running hours since last check. Proceeded with inspection and shutdown / run testing only. All shutdowns are functional, no serious leaks found.

Recommendations:

- a. Continue current practice of daily inspections.

1. Physical Inspection HG2

- a. Lube Oil System – Lube oil system did not show any signs of major leaks or malfunctions.
- b. Oil levels OK. Tank Level Transmitter LT130, zero-span 0-100%, 0-30" H2O. SG correction for oil = .95 = 0-31.57" oil. Reservoir Lo Tap = 17.1%. LO AL = 40% HI HI shutdown = 100%.
- c. Pump Operation – Scavenge and Aux pump running, good pressure, filter DP OK.
- d. Water System – pump test OK.
- e. Control Air System – Pressure good, Pilot SOV leak found and replacement on order. Regulator OK.
- f. Starting Air Panel – regulator OK.
- g. Air inlet – OK
- h. Evap Cooler – OK
- i. Inlet Filter Housing – OK, operational.
- j. Ventilation Fans – OK, filters clean.
- k. Exhaust Ducting – OK

2. Shutdown Test (check for lockout relay and fuel valves shut and fuel vent open)

- a. E-Stop – Local and CCR – OK
- b. Low oil pressure (pre-lube, start and running setpoints checked)– OK
- c. High Gas Pressure – OK
- d. Low Gas Pressure – OK
- e. Low Control Air Pressure – OK
- f. MGT Start temp High – OK
- g. MGT Running temp High – OK
- h. RTB high temp – OK, This is now redundant RTD
- i. Fire Alarm – OK
- j. Bearing High Temperature S/D – OK

- k. Gen HV compartment S/D - OK
- l. Stator winding High Temp S/D - OK
- m. Engine Vibration – OK
- n. Compressor Vibration – OK
- o. Overload – Setpoint verified
- p. Gen and Engine Enclosure High Temp S/D - OK

3. TCSD system health check

- a. Power supply – OK
- b. Speed sensor checked for both signal integrity and open circuit shutdown – OK

4. Pre-Running Checks

- a. Motored engine – OK, Starter OK

5. Running test

- a. Purge run – OK
- b. Ignitors – OK
- c. Start Ramp - OK
- d. Bleeds OPEN – OK
- e. Power turbine – OK
- f. Excitation ON – OK and good ramping
- g. Synchronize and load to 2 MW – Water injection on unit stable
- h. Vibration, pressures, RTB temperature – OK
- i. Load stable

6. Unit Stopping

- a. Units ramp down to 300 KW and open breaker - OK
- b. Units stay at idle for 5 minutes or more cooldown – OK
- c. Fuel cutoff unit coasts down – OK
- d. Aux lube oil pump on during coast down – Yes
- e. Post lube for 30 minutes – OK

Test : _____
Mark Wray

Date: May 31, 2025

**PROCESS UNIT COMPLIANCE
DATA AND WORKSHEET
TUNING RUN 1**

TEST CONSTANTS					TEST VARIABLES				
Station:	City of Vernon				Start Date:	3/24/2026			
Unit:	Gonzales Plant Gas Turbine 1				Start/End Time:	10:42	11:32		
Performed By:	JS, JC, RT				Test Condition:	0.0	MMBtu/hr		
Tref:	68 °F				Barom. Pressure:	29.84			
Stack Area:	12.57	ft ²		Pstack:	-1.20	iwg			
F-Factor	8,710	dscf/MMBtu		Pstack:	29.75	"Hg			
HHV	1,050	Btu/SCF		MW:	28.04	lb/lb-mole			
					METHOD 100.1 DATA				
	dP		Temp	Vel.		O ₂	CO ₂	NO _x	CO
Point	(in. H ₂ O)	sqrt(dP)	°F	(fps)	Range	20	10	50	500
8	1.600	1.2649	1026	121.04	Span value	9.18	4.56	22.34	222.00
7	1.900	1.3784	1029	132.04	Pre-Test Direct Zero	0.01	0.03	-0.07	-0.09
6	2.200	1.4832	1030	142.13	Pre-Test Direct Span	9.03	4.52	22.26	226.93
5	2.200	1.4832	1030	142.13	Pre-Test System Zero	0.04	0.06	-0.05	0.01
4	2.400	1.5492	1029	148.40	Pre-Test System Span	9.03	4.51	22.33	222.72
3	2.100	1.4491	1029	138.81					
2	1.700	1.3038	1025	124.73					
1	1.400	1.1832	1024	113.15					
8	1.500	1.2247	1027	117.24	Post-Test System Zero	0.04	0.05	0.53	-0.12
7	1.900	1.3784	1030	132.08	Post-Test System Span	9.01	4.52	22.72	225.48
6	2.100	1.4491	1031	138.91	Post-Test Direct Zero	0.00	0.03	-0.08	-0.04
5	2.100	1.4491	1033	139.00	Post-Test Direct Span	9.02	4.53	22.32	228.22
4	2.300	1.5166	1030	145.32	Average	14.16	3.78	28.74	267.54
3	2.200	1.4832	1028	142.03	Calibration corr. results	14.43	3.81	28.56	265.02
2	1.800	1.3416	1026	128.39					
1	1.500	1.2247	1025	117.16					
Average	1.9187	1.3852	1028.3	132.66	Pre-test zero bias	0.2%	0.4%	0.0%	0.0%
					Pre-test span bias	0.0%	-0.1%	0.1%	-0.8%
					Post-test zero bias	0.2%	0.2%	1.2%	0.0%
					Post-test span bias	-0.1%	-0.1%	0.8%	-0.5%
					Zero drift	0.0%	-0.1%	1.2%	0.0%
					Span drift	-0.1%	0.0%	0.8%	0.6%
Stack Flow Rate:	100,023.0 wacfm								
Stack Flow Rate:	31,653.9 dscfm								
					METHOD 4.1 DATA				
	Dry Gas Meter				Impingers				
Time	Vol.	T _m (in)	T _m (out)	#/Matl.	End	Start	Diff.		
Start	45.700		89	H ₂ O	796.2	736.5	59.7	Meter Pressure:	1.2 iwg
			92	H ₂ O	744.1	741.5	2.6	Sample Volume:	27.3 dscf
End	74.660		94	Empty	613.2	612.8	0.4	H ₂ O Volume :	3.134 scf
			96	SG	932.3	928.6	3.7	Moisture Content:	10.3 %
Total	28.960		92.8	Total			66.4		
					RESULTS				
					Ref. Meth		Default	Limit	
	Stack Flow Rate	dscfm			31,653.9				
		O ₂ %			14.43				
		NO _x ppmv			28.56				
		NO _x ppmv @ 15%O ₂			26.05			27	
		NO _x lb/hr			6.48				
		NO _x lb/MMSCF			100.75				
		CO ppmv			265.02		100.0		
		CO ppmv @ 15%O ₂			241.69		91.2	248	
		CO lb/hr			36.58		13.80		
		CO lb/MMSCF			569.01		214.70		

**PROCESS UNIT COMPLIANCE
DATA AND WORKSHEET
TUNING RUN 2**

TEST CONSTANTS				TEST VARIABLES			
Station:	City of Vernon			Start Date:	3/24/2026		
Unit:	Gonzales Plant Gas Turbine 1			Start/End Time:	11:45	12:35	
Performed By:	JS, JC, RT			Test Condition:	0.0	MMBtu/hr	
Tref:	68	°F		Barom. Pressure:	29.84		
Stack Area:	12.57	ft ²		Pstack:	-1.20	iwg	
F-Factor	8,710	dscf/MMBtu		Pstack:	29.75	"Hg	
HHV	1,050	Btu/SCF		MW:	27.97	lb/lb-mole	

					METHOD 100.1 DATA				
Point	dP		Temp °F	Vel. (fps)					
	(in. H ₂ O)	sqrt(dP)			O ₂	CO ₂	NO _x	CO	
8	1.500	1.2247	1025	117.30	Range	20	10	50	500
7	1.900	1.3784	1030	132.23	Span value	9.18	4.56	22.34	222.00
6	2.100	1.4491	1029	138.97	Pre-Test Direct Zero	0.00	0.03	-0.08	-0.04
5	2.200	1.4832	1031	142.34	Pre-Test Direct Span	9.02	4.53	22.32	228.22
4	2.500	1.5811	1030	151.68	Pre-Test System Zero	0.04	0.05	0.53	-0.12
3	2.000	1.4142	1028	135.58	Pre-Test System Span	9.01	4.52	22.72	225.48
2	1.900	1.3784	1026	132.06					
1	1.500	1.2247	1026	117.34					
8	1.500	1.2247	1028	117.41	Post-Test System Zero	0.04	0.05	0.38	0.25
7	2.000	1.4142	1031	135.72	Post-Test System Span	8.89	4.48	22.50	227.71
6	2.000	1.4142	1031	135.72	Post-Test Direct Zero	0.00	0.03	-0.05	0.03
5	2.100	1.4491	1034	139.21	Post-Test Direct Span	9.03	4.53	22.26	228.21
4	2.200	1.4832	1032	142.39	Average	14.14	3.79	28.84	262.36
3	2.200	1.4832	1029	142.24	Calibration corr. results	14.52	3.83	28.62	257.05
2	1.900	1.3784	1026	132.06					
1	1.600	1.2649	1026	121.18					
Average	1.9332	1.3904	1028.9	133.34	Pre-test zero bias	0.2%	0.2%	1.2%	0.0%
					Pre-test span bias	-0.1%	-0.1%	0.8%	-0.5%
					Post-test zero bias	0.2%	0.2%	0.9%	0.0%
					Post-test span bias	-0.7%	-0.4%	0.5%	-0.1%
					Zero drift	0.0%	0.0%	-0.3%	0.1%
					Span drift	-0.6%	-0.3%	-0.4%	0.4%

Stack Flow Rate: 100,535.5 wacfm
Stack Flow Rate: 31,576.9 dscfm

METHOD 4.1 DATA								
Time	Dry Gas Meter		T _m (out)	#/Matl.	Impingers			
	Vol.	T _m (in)			End	Start	Diff.	
Start	75.000		96	H ₂ O	800.2	737.4	62.8	Meter Pressure: 1.0 iwg
			100	H ₂ O	773.7	769.5	4.2	Sample Volume: 28.2 dscf
End	105.355		103	Empty	647.7	646.2	1.5	H ₂ O Volume: 3.464 scf
			102	SG	913.4	908.5	4.9	Moisture Content: 10.9 %
Total	30.355		100.3	Total			73.4	

RESULTS			
	Ref. Meth	Default	Limit
Stack Flow Rate dscfm	31,576.9		
O ₂ %	14.52		
NO _x ppmv	28.62		
NO _x ppmv @ 15%O ₂	26.46		27
NO _x lb/hr	6.47		
NO _x lb/MMSCF	102.35		
CO ppmv	257.05	100.0	
CO ppmv @ 15%O ₂	237.71	92.5	248
CO lb/hr	35.39	13.77	
CO lb/MMSCF	559.64	217.72	

**PROCESS UNIT COMPLIANCE
DATA AND WORKSHEET
TUNING RUN 3**

TEST CONSTANTS					TEST VARIABLES				
Station:	City of Vernon				Start Date:	3/24/2026			
Unit:	Gonzales Plant Gas Turbine 1				Start/End Time:	12:48	13:38		
Performed By:	JS, JC, RT				Test Condition:	0.0	MMBtu/hr		
Tref:	68	°F			Barom. Pressure:	29.84			
Stack Area:	12.57	ft ²			Pstack:	-1.20	iwg		
F-Factor	8,710	dscf/MMBtu			Pstack:	29.75	"Hg		
HHV	1,050	Btu/SCF			MW:	28.05	lb/lb-mole		
METHOD 100.1 DATA									
	dP		Temp	Vel.		O ₂	CO ₂	NO _x	CO
Point	(in. H ₂ O)	sqrt(dP)	°F	(fps)	Range	20	10	50	500
8	1.6	1.2649	1028	121.09	Span value	9.18	4.56	22.34	222.00
7	1.8	1.3416	1029	128.48	Pre-Test Direct Zero	0.00	0.03	-0.05	0.03
6	2.2	1.4832	1031	142.13	Pre-Test Direct Span	9.03	4.53	22.26	228.21
5	2.5	1.5811	1031	151.52	Pre-Test System Zero	0.04	0.05	0.38	0.25
4	2.4	1.5492	1030	148.40	Pre-Test System Span	8.89	4.48	22.64	227.71
3	2.2	1.4832	1031	142.13					
2	1.6	1.2649	1027	121.05					
1	1.4	1.1832	1025	113.16					
8	1.5	1.2247	1028	117.25	Post-Test System Zero	0.03	0.05	0.52	0.25
7	2.0	1.4142	1029	135.43	Post-Test System Span	8.97	4.45	22.70	227.85
6	2.0	1.4142	1032	135.57	Post-Test Direct Zero	0.00	0.03	-0.03	0.01
5	2.3	1.5166	1032	145.38	Post-Test Direct Span	9.03	4.53	22.26	228.03
4	2.2	1.4832	1031	142.13	Average	14.12	3.79	28.89	265.34
3	2.2	1.4832	1027	141.94	Calibration corr. results	14.53	3.87	28.59	258.65
2	1.9	1.3784	1026	131.87					
1	1.6	1.2649	1026	121.01					
Average	1.9479	1.3957	1028.9	133.66	Pre-test zero bias	0.2%	0.2%	0.9%	0.0%
					Pre-test span bias	-0.7%	-0.4%	0.8%	-0.1%
					Post-test zero bias	0.1%	0.2%	1.1%	0.0%
					Post-test span bias	-0.3%	-0.9%	0.9%	0.0%
					Zero drift	0.0%	0.0%	0.3%	0.0%
					Span drift	0.4%	-0.4%	0.1%	0.0%
Stack Flow Rate:	100,776.2 wacfm								
Stack Flow Rate:	31,891.8 dscfm								
METHOD 4.1 DATA									
	Dry Gas Meter			Impingers					
Time	Vol.	T _m (in)	T _m (out)	#/Matl.	End	Start	Diff.		
Start	105.700		101	H ₂ O	797.7	739.4	58.3	Meter Pressure:	1.2 iwg
			102	H ₂ O	747.4	744.1	3.3	Sample Volume:	27.2 dscf
End	135.090		104	Empty	613.7	613.1	0.6	H ₂ O Volume :	3.110 scf
			104	SG	936.1	932.4	3.7	Moisture Content:	10.3 %
Total	29.390		102.8	Total			65.9		
RESULTS									
					Ref. Meth		Default	Limit	
	Stack Flow Rate	dscfm			31,891.8				
		O ₂ %			14.53				
		NO _x ppmv			28.59				
		NO _x ppmv @ 15%O ₂			26.46			27	
		NO _x lb/hr			6.53				
		NO _x lb/MMSCF			102.35				
		CO ppmv			258.65		100.0		
		CO ppmv @ 15%O ₂			239.40		92.6	248	
		CO lb/hr			35.97		13.91		
		CO lb/MMSCF			563.62		217.91		

**PROCESS UNIT COMPLIANCE
DATA AND WORKSHEET
TUNING RUN 1**

TEST CONSTANTS				TEST VARIABLES			
Station:	City of Vernon			Start Date:	3/25/2026		
Unit:	Gonzales Plant Gas Turbine 2			Start/End Time:	9:54	10:44	
Performed By:	JS, JC, RT			Test Condition:	0.0	MMBtu/hr	
Tref:	68	°F		Barom. Pressure:	29.84		
Stack Area:	12.57	ft ²		Pstack:	-1.60	iwg	
F-Factor	8,710	dscf/MMBtu		Pstack:	29.72	"Hg	
HHV	1,050	Btu/SCF		MW:	28.16	lb/lb-mole	

					METHOD 100.1 DATA				
Point	dP		Temp °F	Vel. (fps)					
	(in. H ₂ O)	sqrt(dP)			O ₂	CO ₂	NO _x	CO	
8	1.8	1.3416	1010	127.47	Range	20	10	50	500
7	2.2	1.4832	1022	141.50	Span value	9.18	4.56	22.34	222.00
6	2.1	1.4491	1024	138.34	Pre-Test Direc: Zero	0.01	0.03	-0.07	0.00
5	2.2	1.4832	1025	141.64	Pre-Test Direc: Span	9.03	4.52	22.34	222.17
4	2.1	1.4491	1026	138.43	Pre-Test System Zero	0.04	0.05	0.05	0.14
3	2.0	1.4142	1022	134.92	Pre-Test System Span	9.02	4.49	22.31	221.59
2	2.2	1.4832	1021	141.45					
1	1.6	1.2649	1018	120.51					
8	1.9	1.3784	1013	131.10	Post-Test System Zero	0.04	0.06	0.41	0.24
7	2.1	1.4491	1020	138.15	Post-Test System Span	9.01	4.51	22.62	220.72
6	2.0	1.4142	1023	134.96	Post-Test Direct Zero	0.00	0.03	0.02	0.01
5	2.3	1.5166	1025	144.83	Post-Test Direct Span	9.02	4.51	22.26	219.38
4	2.1	1.4491	1026	138.43	Average	14.31	3.71	28.02	258.10
3	2.0	1.4142	1023	134.96	Calibration corr. results	14.59	3.75	27.92	259.12
2	2.3	1.5166	1023	144.73	Pre-test zero bias	0.1%	0.2%	0.2%	0.0%
1	1.7	1.3038	1020	124.30	Pre-test span bias	-0.1%	-0.2%	0.0%	-0.1%
Average	2.0326	1.4257	1021.3	135.98	Post-test zero bias	0.2%	0.2%	0.8%	0.0%
					Post-test span bias	-0.1%	0.0%	0.7%	0.3%
Stack Flow Rate:	102,529.2 wacfm				Zero drift	0.0%	0.1%	0.7%	0.0%
Stack Flow Rate:	32,983.4 dscfm				Span drift	0.0%	0.1%	0.6%	-0.2%

METHOD 4.1 DATA								
Time	Dry Gas Meter		T _m (out)	#/Matl.	Impingers			
	Vol.	T _m (in)			End	Start	Diff.	
Start	137.100		78	H ₂ O	787.4	735.5	51.9	Meter Pressure: 1.2 iwg
			81	H ₂ O	750.1	747.4	2.7	Sample Volume: 28.1 dscf
End	166.080		85	Empty	613.9	613.7	0.2	H ₂ O Volume: 2.832 scf
			88	SG	871.8	866.6	5.2	Moisture Content: 9.1 %
Total	28.980		83.0	Total			60.0	

RESULTS			
	Ref. Meth	Default	Limit
Stack Flow Rate dscfm	32,983.4		
O ₂ %	14.59		
NO _x ppmv	27.92		
NO _x ppmv @ 15%O ₂	26.11		27
NO _x lb/hr	6.60		
NO _x lb/MMSCF	101.00		
CO ppmv	259.12	100.0	
CO ppmv @ 15%O ₂	242.36	93.5	248
CO lb/hr	37.26	14.38	
CO lb/MMSCF	570.59	220.21	

**PROCESS UNIT COMPLIANCE
DATA AND WORKSHEET
TUNING RUN 2**

TEST CONSTANTS				TEST VARIABLES			
Station:	City of Vernon			Start Date:	3/25/2026		
Unit:	Gonzales Plant Gas Turbine 2			Start/End Time:	10:56	11:46	
Performed By:	JS, JC, RT			Test Condition:	0.0	MMBtu/hr	
Tref:	68	°F		Barom. Pressure:	29.84		
Stack Area:	12.57	ft ²		Pstack:	-1.60	iwg	
F-Factor	8,710	dscf/MMBtu		Pstack:	29.72	"Hg	
HHV	1,050	Btu/SCF		MW:	28.06	lb/lb-mole	

					METHOD 100.1 DATA				
		dP	Temp	Vel.	O ₂	CO ₂	NO _x	CO	
Point	(in. H ₂ O)	sqrt(dP)	°F	(fps)	Range	20	10	50	500
8	1.8	1.3416	1019	128.08	Span value	9.18	4.56	22.34	222.00
7	2.0	1.4142	1020	135.06	Pre-Test Direct Zero	0.00	0.03	0.02	0.01
6	2.4	1.5492	1020	147.95	Pre-Test Direct Span	9.02	4.51	22.26	219.38
5	2.3	1.5166	1021	144.88	Pre-Test System Zero	0.04	0.06	0.41	0.24
4	2.2	1.4832	1026	141.94	Pre-Test System Span	9.01	4.51	22.62	220.72
3	2.1	1.4491	1025	138.63					
2	2.1	1.4491	1023	138.53					
1	1.9	1.3784	1020	131.64					
8	1.7	1.3038	1020	124.52	Post-Test System Zero	0.03	0.06	0.53	0.24
7	1.9	1.3784	1023	131.77	Post-Test System Span	9.00	4.50	22.43	218.67
6	2.3	1.5166	1026	145.13	Post-Test Direct Zero	0.00	0.04	-0.03	0.02
5	2.2	1.4832	1025	141.89	Post-Test Direct Span	9.03	4.52	22.14	219.66
4	2.3	1.5166	1030	145.32	Average	14.27	3.73	28.40	250.34
3	2.0	1.4142	1030	135.51	Calibration corr. results	14.57	3.77	28.29	253.00
2	2.1	1.4491	1029	138.81					
1	1.6	1.2649	1027	121.08					
Average	2.0500	1.4318	1024.0	136.92	Pre-test zero bias	0.2%	0.2%	0.8%	0.0%
					Pre-test span bias	-0.1%	0.0%	0.7%	0.3%
					Post-test zero bias	0.2%	0.2%	1.1%	0.0%
					Post-test span bias	-0.1%	-0.1%	0.6%	-0.2%
					Zero drift	0.0%	0.0%	0.2%	0.0%
					Span drift	0.0%	0.0%	-0.4%	-0.4%

Stack Flow Rate: 103,236.6 wacfm
Stack Flow Rate: 32,827.5 dscfm

METHOD 4.1 DATA								
Time	Dry Gas Meter		T _m (out)	#/Matl.	Impingers			Diff.
	Vol.	T _m (in)			End	Start		
Start	166.270		90	H ₂ O	781.8	726.4	55.4	Meter Pressure: 1.2 iwg
			92	H ₂ O	779.1	773.6	5.5	Sample Volume: 28.5 dscf
End	196.170		94	Empty	647.2	645.7	1.5	H ₂ O Volume: 3.177 scf
			97	SG	915.0	910.1	4.9	Moisture Content: 10.0 %
Total	29.900		93.3	Total			67.3	

RESULTS			
	Ref. Meth	Default	Limit
Stack Flow Rate	dscfm	32,827.5	
O ₂	%	14.57	
NO _x	ppmv	28.29	
NO _x	ppmv @ 15%O ₂	26.35	27
NO _x	lb/hr	6.65	
NO _x	lb/MMSCF	101.91	
CO	ppmv	253.00	100.0
CO	ppmv @ 15%O ₂	235.63	93.1 248
CO	lb/hr	36.21	14.31
CO	lb/MMSCF	554.75	219.27

**PROCESS UNIT COMPLIANCE
DATA AND WORKSHEET
TUNING RUN 3**

TEST CONSTANTS				TEST VARIABLES			
Station:	City of Vernon			Start Date:	3/25/2026		
Unit:	Gonzales Plant Gas Turbine 2			Start/End Time:	11:58	12:48	
Performed By:	JS, JC, RT			Test Condition:	0.0	MMBtu/hr	
Tref:	68	°F		Barom. Pressure:	29.84		
Stack Area:	12.57	ft ²		Fstack:	-1.60	iwg	
F-Factor	8,710	dscf/MMBtu		Pstack:	29.72	"Hg	
HHV	1,050	Btu/SCF		MW:	28.09	lb/lb-mole	

					METHOD 100.1 DATA				
Point	dP		Temp °F	Vel. (fps)					
	(in. H ₂ O)	sqrt(dP)			O ₂	CO ₂	NO _x	CO	
8	1.7	1.3038	1026	124.71	Range	20	10	50	500
7	2.2	1.4832	1030	142.06	Span value	9.18	4.56	22.34	222.00
6	2.3	1.5166	1030	145.25	Pre-Test Direct Zero	0.00	0.04	-0.03	0.02
5	2.3	1.5166	1031	145.30	Pre-Test Direct Span	9.03	4.52	22.14	219.66
4	2.1	1.4491	1025	138.56	Pre-Test System Zero	0.03	0.06	0.53	0.24
3	2.2	1.4832	1022	141.68	Pre-Test System Span	9.00	4.50	22.43	218.67
2	2.0	1.4142	1020	134.99					
1	1.8	1.3416	1020	128.07					
8	1.8	1.3416	1029	128.45	Post-Test System Zero	0.03	0.05	0.57	0.25
7	2.0	1.4142	1030	135.45	Post-Test System Span	9.01	4.49	22.55	221.84
6	2.2	1.4832	1031	142.11	Post-Test Direct Zero	0.00	0.03	-0.05	-0.02
5	2.4	1.5492	1030	148.38	Post-Test Direct Span	9.03	4.51	22.31	219.13
4	2.1	1.4491	1030	138.79	Average	14.27	3.73	28.69	247.13
3	2.2	1.4832	1028	141.96	Calibration corr. results	14.56	3.78	28.66	249.12
2	2.0	1.4142	1027	135.31					
1	1.9	1.3784	1026	131.84					
Average	2.0703	1.4389	1027.2	137.68	Pre-test zero bias	0.2%	0.2%	1.1%	0.0%
					Pre-test span bias	-0.1%	-0.1%	0.6%	-0.2%
					Post-test zero bias	0.2%	0.2%	1.2%	0.1%
					Post-test span bias	-0.1%	-0.1%	0.5%	0.5%
					Zero drift	0.0%	-0.1%	0.1%	0.0%
					Span drift	0.0%	-0.1%	0.2%	0.6%

METHOD 4.1 DATA								
Time	Dry Gas Meter		T _m (out)	#Matl.	Impingers			
	Vol.	T _m (in)			End	Start	Diff.	
Start	196.305		98	H ₂ O	796.5	740.8	55.7	Meter Pressure: 1.2 iwg
			100	H ₂ O	754.0	750.1	3.9	Sample Volume: 28.1 dscf
End	226.135		101	Empty	614.5	613.9	0.6	H ₂ O Volume : 3.049 scf
			102	SG	876.2	871.8	4.4	Moisture Content: 9.8 %
Total	29,830		100.3	Total			64.6	

RESULTS			
	Ref. Meth	Default	Limit
Stack Flow Rate dscfm	33,024.1		
O ₂ %	14.56		
NO _x ppmv	28.66		
NO _x ppmv @ 15%O ₂	26.68		27
NO _x lb/hr	6.78		
NO _x lb/MMSCF	103.18		
CO ppmv	249.12	100.0	
CO ppmv @ 15%O ₂	231.90	93.1	248
CO lb/hr	35.87	14.40	
CO lb/MMSCF	545.96	219.15	



**Northwest
Electrical
Services**

**Vernon Gas and Electric
Gonzales Unit #1
15 Minute Running Data Log Report**

Report Date - 3/24/2026

Reading	Description	Units
U1_AE191A	GAS SENSOR (EXHAUST DUCT)	%LEL
U1_AE191B	GAS SENSOR (PIPE GALLEY)	%LEL
U1_CVG	CVG POSITION	in
U1_ET160	ET-160 D.C. CONTROL VOLTAGE	VOLTS
U1_FT110	GAS FUEL FLOW TRANSMITTER	LB/HR
U1_FT118	WATER INJECTION FLOW	LB/HR
U1_GEN_I_A	GENERATOR PHASE A CURRENT	AMPS
U1_GEN_I_B	GENERATOR PHASE B CURRENT	AMPS
U1_GEN_I_C	GENERATOR PHASE C CURRENT	AMPS
U1_KVAR	GENERATOR KVAR	KVAR
U1_KW	UNIT KW LOAD	kW
U1_LT130	LUBE OIL RESERVOIR LEVEL	%
U1_MGT	TURBINE MGT	°F
U1_PDT110	GAS FMV D/P	PSID
U1_PDT118	WATER INJECTION FILTER D/P	PSID
U1_PDT132	LUBE OIL FILTER D/P	PSID
U1_PDT152	COMPRESSOR INLET PRESSURE	"WC
U1_PDT159	TURBINE EXHAUST D/P	"WC
U1_PF	GENERATOR PF	PF
U1_PT110	GAS FUEL SUPPLY PRESSURE	psi
U1_PT111	GAS FUEL MANIFOLD PRESSURE	psi
U1_PT116	COMPRESSOR DISCHARGE PRESSURE	psi
U1_PT131	TURBINE LUBE OIL PRESSURE	psi
U1_PT133	GEAR BOX OIL PRESSURE	psi
U1_PT199	STARTER AIR PRESSURE	psi
U1_SE156A	TURBINE P.T. SPEED	rpm
U1_SE156B	TURBINE G.P. SPEED	rpm
U1_STRT_SEQ_STEP 6	START SEQUENCE MAIN FUEL ON	
U1_TE133	TE-133 LUBE OIL TEMPERATURE	°F
U1_TE152	TE-152 COMPRESSOR INLET TEMPERATURE	°F
U1_TE159	TE-159 TURBINE EXHAUST TEMPERATURE	°F
U1_TE160	TE-160 RTB BEARING TEMPERATURE	°F
U1_TE161A	TE-161A GEARBOX BEARING INBOARD LOW SPEED TEMP	°F
U1_TE161B	TE-161B GEARBOX BEARING OUTBOARD LOW SPEED TEMP	°F
U1_TE162A	TE-162A GEARBOX BEARING INBOARD HIGH SPEED TEMP	°F
U1_TE162B	TE-162B GEARBOX BEARING OUTBOARD HIGH SPEED TEMP	°F
U1_TE166A	TE-166A GENERATOR INBOARD BEARING TEMPERATURE	°F



Northwest
Electrical
Services

Vernon Gas and Electric
Gonzales Unit #1
15 Minute Running Data Log Report

Report Date - 3/24/2026

10:42	10:57	11:12	11:27	11:42	11:57	12:12
0.18	0.17	0.14	0.19	0.16	0.16	0.17
(19.83)	(19.84)	(19.79)	(19.80)	(19.81)	(19.84)	(19.81)
2.02	2.02	2.02	2.02	2.02	2.02	2.02
24.86	24.86	24.87	24.86	24.87	24.86	24.86
2954.53	2925.84	2935.13	2944.41	2900.53	2918.53	2922.47
1916.61	1905.39	1899.78	1907.84	1894.07	1891.52	1893.97
454.98	452.95	451.09	453.57	450.45	451.07	451.51
448.10	446.41	443.65	446.06	443.38	444.52	444.08
454.61	453.22	451.20	452.81	450.32	450.79	450.85
1207.94	1205.91	1206.36	1206.60	1203.72	1206.14	1208.79
5598.22	5580.27	5566.87	5582.90	5546.48	5550.38	5577.77
76.62	76.71	76.65	76.72	76.69	76.65	76.66
1454.00	1452.00	1455.00	1456.00	1456.00	1455.00	1459.00
4.83	4.80	4.80	4.84	4.76	4.79	4.84
12.04	12.04	11.93	11.86	11.91	11.77	11.70
4.27	4.26	4.27	4.28	4.28	4.27	4.28
2.77	2.77	2.77	2.78	2.76	2.76	2.78
0.73	0.58	0.49	0.60	0.56	0.46	0.73
(0.98)	(0.98)	(0.98)	(0.98)	(0.98)	(0.98)	(0.98)
269.67	269.65	269.27	269.24	269.67	269.19	269.12
199.47	198.65	198.58	199.17	198.20	198.18	198.94
151.96	151.60	151.53	151.58	150.94	151.35	151.66
66.60	66.53	66.59	66.55	66.49	66.51	66.58
24.98	24.98	24.98	24.98	24.96	24.95	24.95
242.26	245.58	248.58	249.79	247.37	244.05	242.25
11517.04	11517.04	11517.04	11517.04	11517.04	11517.04	11517.04
14802.48	14786.71	14810.22	14809.36	14808.50	14809.36	14821.97
1.00	1.00	1.00	1.00	1.00	1.00	1.00
103.80	103.80	103.60	103.80	104.10	104.10	103.90
63.50	63.50	64.60	64.60	64.90	64.60	65.20
1017.60	1016.30	1020.10	1021.30	1020.10	1020.10	1022.60
152.00	152.00	152.00	152.00	152.00	152.00	152.00
135.40	135.60	135.50	135.80	136.10	136.10	135.80
132.40	132.60	132.50	132.60	132.60	132.60	132.50
164.80	164.90	164.80	164.90	164.90	164.90	164.80
155.80	156.30	155.80	156.10	155.80	156.10	156.10
92.60	92.90	93.90	95.20	95.20	95.20	95.60



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12:27	12:42	12:57	13:12	13:27
0.13	0.19	0.24	0.18	0.19
(19.86)	(19.86)	(19.92)	(19.86)	(19.86)
2.02	2.02	2.02	2.02	2.02
24.87	24.84	24.87	24.85	24.88
2933.16	2909.25	2917.13	2905.03	2923.31
1892.95	1897.13	1889.07	1892.24	1914.26
450.48	453.38	452.98	449.34	452.66
443.40	445.54	445.49	440.92	443.99
449.98	452.34	452.26	448.13	451.59
1228.21	1211.45	1230.08	1189.17	1213.86
5592.20	5579.27	5574.44	5532.30	5601.46
76.61	76.59	76.65	76.54	76.51
1458.00	1458.00	1459.00	1459.00	1462.00
4.81	4.86	4.85	4.76	4.85
11.65	11.70	11.56	11.53	11.46
4.28	4.27	4.28	4.27	4.28
2.78	2.79	2.77	2.76	2.78
0.52	0.69	0.69	0.59	0.64
(0.97)	(0.97)	(0.97)	(0.98)	(0.98)
269.12	268.70	269.11	270.34	270.77
198.84	199.39	198.71	197.93	199.05
151.35	151.70	151.40	150.94	151.48
66.63	66.59	66.56	66.58	66.51
24.95	24.95	24.95	24.94	24.92
241.35	240.44	239.84	239.23	238.63
11517.04	11517.04	11517.04	11517.04	11517.04
14821.40	14808.50	14813.94	14816.52	14844.62
1.00	1.00	1.00	1.00	1.00
104.10	104.10	104.30	104.60	104.10
65.20	65.20	65.60	66.60	66.90
1023.80	1023.80	1022.60	1025.10	1026.30
153.00	153.00	153.00	153.00	153.00
136.00	136.00	136.00	136.40	136.10
132.60	132.80	133.00	133.00	132.90
165.10	164.90	165.30	165.10	165.10
156.30	156.30	156.40	156.30	156.40
95.90	97.60	97.20	97.20	97.90



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U1_TE166B	TE-166B GENERATOR OUTBOARD BEARING TEMPERATURE	°F
U1_TE169A	GENERATOR STATOR TEMP PHASE A	°F
U1_TE169C	GENERATOR STATOR TEMP PHASE B	°F
U1_TE169E	GENERATOR STATOR TEMP PHASE C	°F
U1_TE192	TE-192 ENGINE ENCLOSURE TEMPERATURE	°F
U1_VOLTS_AB	GENERATOR VOLTS A-B	VOLTS
U1_VOLTS_BC	GENERATOR VOLTS B-C	VOLTS
U1_VOLTS_CA	GENERATOR VOLTS C-A	VOLTS
U1_VT158A	TURBINE REAR COMPRESSOR VIBRATION	IN/SEC
U1_VT158B	TURBINE FORWARD COMPRESSOR VIBRATION	IN/SEC
U1_VT163A	VT-163A GEARBOX VIBRATION INBOARD H/S-X	MILS
U1_VT163B	VT-163B GEARBOX VIBRATION INBOARD H/S-Y	MILS
U1_VT164A	VT-164A GEARBOX VIBRATION OUTBOARD L/S-X	MILS
U1_VT164B	VT-164B GEARBOX VIBRATION OUTBOARD L/S-Y	MILS
U1_VT167A	VT-167A GENERATOR VIBRATION INBOARD X	MILS
U1_VT167B	VT-167B GENERATOR VIBRATION INBOARD Y	MILS
U1_VT168A	VT-168A GENERATOR VIBRATION OUTBOARD X	MILS
U1_VT168B	VT-168B GENERATOR VIBRATION OUTBOARD Y	MILS
U1_WATER_RATIO_SP	SETPOINT FOR WATER INJECTION RATIO	%
U1_XI_AIFB	XI_AIFB AIR INLET FILTER BLOWER ON	
U1_XI_GCB_OPEN	XI_GCB_OPEN GCB OPEN	
U1_XI_LOH	XI_LOH LUBE OIL HEATERS ON	
U1_XI_LOP	XI_LOP LUBE OIL PUMP ON	
U1_XI_SP	XI_SP SCAVENGE PUMP ON	
U1_XI_VF	XI_VF VENT FAN ON	
U1_XI_WIP	XI_WIP WATER INJECTION PUMP ON	
U1_XIEC	XIEC EVAP COOLER ON	
U1_XIEXC	XIEXC EXCITER OUTPUT ON	



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114.20	114.60	114.90	115.20	115.20
188.60	190.40	190.40	190.40	192.20
185.00	186.80	186.80	186.80	186.80
194.00	194.00	194.00	194.00	195.80
86.70	87.40	88.10	88.70	88.70
7328.70	7262.27	7266.55	7299.22	7312.09
7365.36	7303.40	7309.27	7338.47	7344.15
7329.13	7265.18	7276.87	7300.14	7310.57
0.18	0.18	0.18	0.18	0.18
0.18	0.18	0.18	0.18	0.18
0.72	0.72	0.72	0.73	0.72
(0.30)	(0.30)	(0.30)	(0.30)	(0.30)
0.26	0.25	0.25	0.25	0.25
0.26	0.26	0.26	0.26	0.26
0.94	0.94	0.94	0.94	0.95
0.93	0.94	0.94	0.94	0.94
1.74	1.75	1.74	1.74	1.75
(0.30)	(0.30)	(0.30)	(0.30)	(0.30)
64.00	64.00	64.00	64.00	64.00
1.00	1.00	1.00	1.00	1.00
0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00
1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00



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Gonzales Unit #2
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Reading	Description	Units
U2_AE191A	GAS SENSOR (EXHAUST DUCT)	%LEL
U2_AE191B	GAS SENSOR (PIPE GALLEY)	%LEL
U2_CVG	CVG POSITION	in
U2_ET160	ET-160 D.C. CONTROL VOLTAGE	VOLTS
U2_FT110	GAS FUEL FLOW TRANSMITTER	LB/HR
U2_FT118	WATER INJECTION FLOW	LB/HR
U2_GEN_I_A	GENERATOR PHASE A CURRENT	AMPS
U2_GEN_I_B	GENERATOR PHASE B CURRENT	AMPS
U2_GEN_I_C	GENERATOR PHASE C CURRENT	AMPS
U2_HMI_WI_ENABLE	HMI COMMAND ENABLE WATER INJECTION	
U2_KVAR	GENERATOR KVAR	KVAR
U2_KW	UNIT KW LOAD	kW
U2_LT130	LUBE OIL RESERVOIR LEVEL	%
U2_MGT	TURBINE MGT	°F
U2_PDT110	GAS FMV D/P	PSID
U2_PDT118	WATER INJECTION SUCTION PRESSURE	psi
U2_PDT132	LUBE OIL FILTER D/P	PSID
U2_PDT152	COMPRESSOR INLET PRESSURE	"WC
U2_PDT159	TURBINE EXHAUST D/P	"WC
U2_PF	GENERATOR PF	PF
U2_PT110	GAS FUEL SUPPLY PRESSURE	psi
U2_PT111	GAS FUEL MANIFOLD PRESSURE	psi
U2_PT116	COMPRESSOR DISCHARGE PRESSURE	psi
U2_PT131	TURBINE LUBE OIL PRESSURE	psi
U2_PT133	GEAR BOX OIL PRESSURE	psi
U2_PT199	STARTER AIR PRESSURE	psi
U2_SE156A	TURBINE P.T. SPEED	rpm
U2_SE156B	TURBINE G.P. SPEED	rpm
U2_STRT_SEQ_STEP 6	START SEQUENCE MAIN FUEL ON	
U2_TE133	TE-133 LUBE OIL TEMPERATURE	°F
U2_TE152	TE-152 COMPRESSOR INLET TEMPERATURE	°F
U2_TE159	TE-159 TURBINE EXHAUST TEMPERATURE	°F
U2_TE160	TE-160 RTB BEARING TEMPERATURE	°F
U2_TE161A	TE-161A GEARBOX BEARING INBOARD LOW SPEED TEMP	°F
U2_TE161B	TE-161B GEARBOX BEARING OUTBOARD LOW SPEED TEMP	°F
U2_TE162A	TE-162A GEARBOX BEARING INBOARD HIGH SPEED TEMP	°F
U2_TE162B	TE-162B GEARBOX BEARING OUTBOARD HIGH SPEED TEMP	°F



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09:58	10:13	10:28	10:43	10:58	11:13	11:28	11:43
0.28	0.28	0.29	0.30	0.31	0.26	0.27	0.28
0.52	0.59	0.64	0.65	0.56	0.53	0.59	0.52
2.01	2.01	2.01	2.01	2.01	2.01	2.01	2.01
25.52	25.52	25.52	25.53	25.53	25.53	25.54	25.54
3237.19	3216.38	3203.16	3209.06	3209.91	3215.53	3216.09	3217.50
1995.92	1969.15	1996.07	1966.31	1981.26	1961.08	1967.96	1970.65
449.90	447.55	449.55	447.85	448.75	449.92	451.27	451.52
441.70	439.88	441.09	440.10	441.44	442.30	444.06	443.96
449.07	447.58	449.72	447.62	449.07	450.01	450.72	450.66
1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1208.91	1184.42	1188.31	1183.08	1197.09	1202.25	1191.01	1196.20
5483.47	5475.84	5502.23	5477.11	5498.02	5510.00	5513.25	5503.67
74.13	73.97	74.06	74.36	74.06	74.00	73.92	73.95
1460.00	1459.00	1464.00	1461.00	1465.00	1466.00	1469.00	1469.00
4.00	3.99	4.02	4.01	4.04	4.06	4.07	4.07
13.54	13.45	13.42	13.37	13.33	13.23	13.20	13.15
4.19	4.19	4.19	4.16	4.16	4.15	4.16	4.15
2.69	2.67	2.68	2.67	2.67	2.69	2.69	2.69
(0.79)	(0.79)	(0.81)	(0.85)	(0.82)	(0.84)	(0.81)	(0.82)
(0.97)	(0.98)	(0.98)	(0.98)	(0.98)	(0.97)	(0.98)	(0.98)
272.12	271.59	271.59	271.15	271.15	271.15	271.17	271.17
191.99	192.11	192.89	192.11	192.81	192.99	193.13	193.28
150.45	150.65	150.85	150.57	151.17	151.18	151.40	151.20
67.26	67.29	67.26	67.35	67.24	67.25	67.28	67.26
24.30	24.30	24.30	24.30	24.30	24.30	24.30	24.30
235.80	232.46	228.84	228.23	227.93	234.91	235.21	235.52
11458.41	11458.41	11458.41	11458.41	11458.41	11458.41	11458.41	11458.41
14707.59	14707.02	14712.75	14713.61	14737.69	14733.39	14737.40	14748.30
1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
118.00	118.20	118.00	118.20	118.20	118.20	118.20	118.20
63.10	63.10	63.90	64.20	64.60	64.60	65.20	65.20
1001.70	1003.00	1005.50	1006.70	1008.00	1008.00	1010.50	1009.20
180.00	180.00	180.00	180.00	180.00	180.00	180.00	180.00
149.10	149.10	149.10	148.80	149.10	149.10	149.10	149.10
158.90	158.90	158.90	158.90	158.60	158.60	158.60	158.60
163.80	163.80	163.80	163.80	163.80	163.80	164.10	163.80
171.50	171.60	171.80	171.80	171.80	171.80	172.00	171.80



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11:58	12:13	12:28	12:43
0.23	0.33	0.20	0.32
0.63	0.61	0.65	0.59
2.01	2.01	2.01	2.01
25.56	25.54	25.55	25.54
3182.34	3168.84	3152.81	3198.94
1970.65	1955.70	1950.47	1955.10
447.10	444.14	441.67	449.53
439.40	436.45	434.23	440.91
447.03	444.73	441.68	448.63
1.00	1.00	1.00	1.00
1197.96	1173.51	1181.34	1193.89
5501.03	5468.96	5417.84	5501.46
74.11	73.95	73.79	73.78
1470.00	1466.00	1462.00	1472.00
4.09	4.03	3.99	4.10
13.14	13.13	13.07	12.99
4.16	4.15	4.17	4.16
2.69	2.68	2.66	2.68
(0.81)	(0.85)	(0.86)	(0.86)
(0.98)	(0.98)	(0.98)	(0.98)
271.15	271.14	271.17	271.17
193.19	192.20	191.36	193.12
151.25	150.71	150.04	151.49
67.26	67.26	67.20	67.26
24.30	24.30	24.30	24.30
235.82	235.82	231.86	227.93
11458.41	11458.41	11458.41	11458.41
14764.64	14723.36	14706.16	14766.07
1.00	1.00	1.00	1.00
118.20	118.20	118.00	118.00
65.60	66.20	66.20	66.20
1010.50	1011.70	1011.70	1013.00
180.00	180.00	179.00	180.00
149.10	148.80	148.80	148.80
158.60	158.60	158.30	158.30
163.80	163.80	163.80	163.80
171.90	171.80	171.80	171.40



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U2_TE166A	TE-166A GENERATOR INBOARD BEARING TEMPERATURE	°F
U2_TE166B	TE-166B GENERATOR OUTBOARD BEARING TEMPERATURE	°F
U2_TE169A	GENERATOR STATOR TEMP PHASE A	°F
U2_TE169C	GENERATOR STATOR TEMP PHASE B	°F
U2_TE169E	GENERATOR STATOR TEMP PHASE C	°F
U2_TE192	TE-192 ENGINE ENCLOSURE TEMPERATURE	°F
U2_VOLTS_AB	GENERATOR VOLTS A-B	VOLTS
U2_VOLTS_BC	GENERATOR VOLTS B-C	VOLTS
U2_VOLTS_CA	GENERATOR VOLTS C-A	VOLTS
U2_VT158A	TURBINE REAR COMPRESSOR VIBRATION	IN/SEC
U2_VT158B	TURBINE FORWARD COMPRESSOR VIBRATION	IN/SEC
U2_VT163A	VT-163A GEARBOX VIBRATION INBOARD H/S-X	MILS
U2_VT163B	VT-163B GEARBOX VIBRATION INBOARD H/S-Y	MILS
U2_VT164A	VT-164A GEARBOX VIBRATION OUTBOARD L/S-X	MILS
U2_VT164B	VT-164B GEARBOX VIBRATION OUTBOARD L/S-Y	MILS
U2_VT167A	VT-167A GENERATOR VIBRATION INBOARD X	MILS
U2_VT167B	VT-167B GENERATOR VIBRATION INBOARD Y	MILS
U2_VT168A	VT-168A GENERATOR VIBRATION OUTBOARD X	MILS
U2_VT168B	VT-168B GENERATOR VIBRATION OUTBOARD Y	MILS
U2_WATER_RATIO_S P	SETPOINT FOR WATER INJECTION RATIO	%
U2_XI_AIFB	XI_AIFB AIR INLET FILTER BLOWER ON	
U2_XI_GCB_OPEN	XI_GCB_OPEN GCB OPEN	
U2_XI_LOH	XI_LOH LUBE OIL HEATERS ON	
U2_XI_LOP	XI_LOP LUBE OIL PUMP ON	
U2_XI_SP	XI_SP SCAVENGE PUMP ON	
U2_XI_VF	XI_VF VENT FAN ON	
U2_XI_WIP	XI_WIP WATER INJECTION PUMP ON	
U2_XIEC	XIEC EVAP COOLER ON	
U2_XIEXC	XIEXC EXCITER OUTPUT ON	



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101.70	102.40	103.10	103.40
111.20	111.60	111.90	111.90
185.00	186.80	186.80	188.60
188.60	190.40	190.40	190.40
186.80	188.60	188.60	188.60
87.90	89.20	88.60	89.20
7280.46	7274.94	7274.02	7258.89
7304.01	7308.01	7288.88	7286.94
7291.42	7290.46	7276.27	7278.85
0.13	0.16	0.13	0.12
0.46	0.46	0.46	0.47
1.39	1.38	1.37	1.37
1.19	1.18	1.18	1.20
0.40	0.40	0.40	0.40
0.48	0.48	0.49	0.49
0.72	0.72	0.72	0.72
0.60	0.60	0.60	0.60
0.65	0.65	0.65	0.65
0.91	0.92	0.92	0.92
61.00	61.00	61.00	61.00
1.00	1.00	1.00	1.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00

Unit: HG1

Date	Run	Time Stamp	15-Minute Run Log Data			Calculated Water-to-Fuel Ratio
			Gas Fuel Flow Transmitter (lb/hr)	Water Injection Flow (lb/hr)	Setpoint for Water Injection Ratio (%)	
3/24/2026	1	10:42	2,954.53	1,916.61	64	0.64
		10:57	2,925.84	1,905.39	64	0.65
		11:12	2,935.13	1,899.78	64	0.64
		11:27	2,944.41	1,907.84	64	0.64
	2	11:42	2,900.53	1,894.07	64	0.65
		11:57	2,918.53	1,891.52	64	0.64
		12:12	2,922.47	1,893.97	64	0.64
		12:27	2,933.16	1,892.95	64	0.64
		12:42	2,909.25	1,897.13	64	0.65
	3	12:57	2,917.13	1,889.07	64	0.64
		13:12	2,905.03	1,892.24	64	0.65
		13:27	2,923.31	1,914.26	64	0.65
		Averages			2,924.11	1,899.57

Unit: HG2

Date	Run	Time Stamp	15-Minute Run Log Data			Calculated Water-to-Fuel Ratio
			Gas Fuel Flow Transmitter (lb/hr)	Water Injection Flow (lb/hr)	Setpoint for Water Injection Ratio (%)	
3/25/2026	1	9:58	3,237.19	1,995.92	61	0.61
		10:13	3,216.38	1,969.15	61	0.61
		10:28	3,203.16	1,996.07	61	0.62
		10:43	3,209.06	1,966.31	61	0.61
	2	10:58	3,209.91	1,981.26	61	0.61
		11:13	3,215.53	1,961.08	61	0.60
		11:28	3,216.09	1,967.96	61	0.61
		11:43	3,217.50	1,970.65	61	0.61
	3	11:58	3,182.34	1,970.65	61	0.61
		12:13	3,168.84	1,955.70	61	0.61
		12:28	3,152.81	1,950.47	61	0.61
		12:43	3,198.94	1,955.10	61	0.61
		Averages			3,202.31	1,970.03