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9 VERNON PUBLIC UTILITIES

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

13 In the Matter of
14 VERNON PUBLIC UTILITIES
15 [Facility I.D. No. 014502]
16
17 Petitioner,
18
19 vs.
20 SOUTH COAST AIR QUALITY
21 MANAGEMENT DISTRICT,
22
23 Respondent.

Case No. 4957-8

**DECLARATION OF LISA UMEDA RE:
REGULAR VARIANCE PETITION; FILED
IN SUPPORT OF CONSENT CALENDAR**

Hearing Date: June 30, 2026
Time: 9:30 a.m.
Place: South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

24 I, Lisa Umeda, declare:

- 25 1. I am the Utilities Compliance Administrator for Vernon Public Utilities (“VPU” or
26 “Petitioner”). If called as a witness, I could testify to the following based on personal
27 knowledge.
- 28 2. I am familiar with and have reviewed the petition filed in Case No. 4957-8, and I am
familiar with the issues presented in the petition related to the water-to-fuel ratio range
required by Permit Condition No. C10.1 of the Title V Permit issued to Facility I.D. No.
014502 (Revision No. 20).
3. For the past 10 years, I have served as the Utilities Compliance Administrator of VPU’s
Station A (“Facility”), consisting of two Allison Model 571- KA natural gas-fired
peaking units with water injection systems (Devices D1 and D2, commonly referred to as
the H. Gonzales Units or “HG Units”), a diesel-fired emergency generator, and associated

1 equipment. Station A has a total power output of 10-megawatts. The HG Units are used
2 to meet local resource adequacy in the California Independent System Operator,
3 primarily during peak demand or emergency conditions, and to support VPU's black start
4 capability.

- 4 4. VPU made improvements to the non-permitted water injection components of the HG
5 Units to enhance control of water flow and, by extension, emissions performance. The
6 improvements were completed in July 2025 for Device D1 and in February 2026 for
7 Device D2.
- 7 5. Following these improvements, VPU performed equipment tuning to confirm the water-
8 to-fuel ratio setpoints aligned with the NOx and CO concentration limits provided in
9 Section D of the Facility's Title V Permit. Preliminary tuning was performed on Device
10 D1 in July 2025 with inconclusive results. More robust tuning was performed on both
11 Devices D1 and D2 in March 2026.
- 12 6. During the March 2026 equipment tuning, each HG Unit was run at maximum load with
13 NOx and CO concentrations determined using District Method 100.1. Results from this
14 tuning indicate that compliance with the permitted NOx and CO concentration limits is
15 achieved at lower water-to-fuel ratios than the permitted range specified in Permit
16 Condition No. C10.1. Therefore, while VPU can operate the HG Units at the water-to-
17 fuel ratio specified in Permit Condition No. C10.1, doing so would likely result in
18 emissions above the permitted NOx and CO concentration limits.
- 19 7. VPU submitted a Title V Permit Modification Application on June 16, 2026 to formally adjust
20 the water-to-fuel ratio range of Permit Condition No. C10.1 from between 0.71 and 0.77 to
21 between 0.61 and 0.67, based on the March 2026 equipment tuning results.
- 22 8. VPU is requesting a variance to allow operation of the HG Units (Devices D1 and D2) at the
23 proposed, lower water-to-fuel ratio range while the Title V Permit Modification Application is
24 reviewed by the District. District approval is expected no later than July 1, 2027.
- 25 9. There will be no excess emissions during the variance period because operation at the lower
26 water-to-fuel ratio range has been demonstrated to comply with the permitted NOx and CO
27 concentration limits.
- 28 10. 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. VPU shall use
these data to calculate the water-to-fuel ratio during operations. A log with these monitored
and calculated data points shall be provided to the District upon request.

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

Executed this 24th day of June 2026 at Vernon, California.



LISA UMEDA