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

**In the Matter of**

EL SEGUNDO ENERGY CENTER LLC  
[Facility ID No. 115663],

Petitioner,

v.

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT.

Respondent.

Case No. 5097-11

**DECLARATION OF GEORGE  
PIANTKA RE SHORT VARIANCE  
PETITION; FILED IN SUPPORT OF  
CONSENT CALENDAR**

Hearing Date: March 12, 2026  
Time: 9:30 a.m.  
Place: South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

I, George Piantka, declare:

1. I am the Senior Director for NRG Energy, which operates El Segundo Energy Center LLC (“Facility”). If called as a witness, I could testify to the following based on personal knowledge.

2. I am familiar with and have reviewed the petition filed in Case no 5097-11, and I am familiar with the issues to the inability of ESEC Unit 5 (Device D67) to comply with the NOx and CO emission limits contained in conditions and rules as specified in the Title V permit for Facility No. 115663 (Revision no. 57) (the revised “Title V Permit”), including Rule 203(b), Rule 1303 (a)(1) and (b)(2), Rule 2004(f)(1), Rule 2005(b)(1)(A), Rule 1703(a)(2), & Rule 3002(c)(1), and Permit Conditions A99.7, A99.8, A99.9, A195.8, A195.9, A195.10, A195.11 and D12.11, during the NERC-required performance testing.

3. For the past 11 years I have served as the Senior Director of Regulatory Environmental Services at NRG Energy, which operates El Segundo Energy Center, a major natural-gas-fired

1 power generation facility. It is a two-unit, rapid-response combined-cycle, dry-cooled plant  
2 located in the City of El Segundo in Los Angeles County. Following the generator exciter outage  
3 and maintenance, NERC performance testing is required to return Unit 5 (Device D67) to service.  
4 This testing includes operation at full-speed no-load (FSNL) and minimum load, during which  
5 catalyst temperatures will be too low for effective emissions control. As a result, Petitioner cannot  
6 comply with the applicable NOx and CO emission limits during these required test conditions,  
7 making it beyond Petitioner's reasonable control to comply with the District rules and permit  
8 conditions during the limited NERC testing period.

9 4. The district rules and permit conditions applicable to ESEC Unit 5 (Device D67)  
10 include Rule 203(b), Rule 1303 (a)(1) and (b)(2), Rule 2004(f)(1), Rule 2005(b)(1)(A), Rule  
11 1703(a)(2), & Rule 3002(c)(1) and Conditions A99.7, A99.8, A99.9, A195.8, A195.9, A195.10,  
12 A195.11, and D12.11, which establish enforceable NOx, CO, and VOC emission limits and  
13 incorporate applicable BACT and federal requirements under 40 CFR 60 Subpart KKKK. These  
14 limits cannot be achieved during full-speed no-load (FSNL) and minimum-load operation required  
15 for the NERC performance testing sequence because catalyst temperatures will be below the  
16 effective activation range for emission control. Therefore, Unit 5 cannot comply with these  
17 emission limits during the NERC-required testing.

18 5. Following the generator exciter outage and maintenance on Unit 5, completion of the  
19 NERC-required performance testing is necessary before the unit may be returned to commercial  
20 service. The testing protocol requires operation at FSNL, minimum load, intermediate load, and  
21 full load. During FSNL and minimum-load operation, the unit's emission control systems cannot  
22 achieve the NOx and CO limits specified in the applicable permit conditions, making compliance  
23 beyond the Petitioner's reasonable control during this limited test period.

24 6. The Facility team has evaluated the circumstances and determined that completing the  
25 NERC testing under a variance is the only feasible course of action, as compliance with the  
26 applicable emission limits cannot be maintained during the required low-load operating  
27 conditions.  
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