From: Michael Munoz

**Sent:** Thursday, April 10, 2025 1:30 PM

To: Thomas J Lee

**Cc:** Albert Dietz; Daniel Gonzalez

Subject: RE: 186899 ICEGEN

Dear Mr. Lee,

We came out of CAISO outage on 1 April 2025. However, we remain in EDAS outage due to a cut T-1 and copper line in the AT&T circuit. As a result we have not been able to transmit to AQMD.

Our gas lines remain capped.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: Michael Munoz

**Sent:** Tuesday, March 4, 2025 12:32 PM **To:** Thomas J Lee <tlee2@aqmd.gov>

Subject: RE: 186899 ICEGEN

DEar Mr. Lee,

ICEGEN's gas turbine generator rotor was received and installed in February. ICEGEN went back into outage on 1 March without having fired. The gas lines remain capped. ICEGEN will come out of outage on 31 March 2025. Please contact me with any questions.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: Michael Munoz

**Sent:** Friday, January 31, 2025 8:05 PM **To:** Thomas J Lee < <u>tlee2@aqmd.gov</u>>

Subject: 186899 ICEGEN

Dear Mr. Lee,

ICEGEN will come out of outage tonight. We have requested a test run Monday .

From: Michael Munoz

Sent: Monday, April 14, 2025 5:42 PM

To: Thomas J Lee

Cc: Albert Dietz; Daniel Gonzalez

FW: NOTIFICATION OF NON-COMPLIANCE: Device ID - 5912141 for Resource ID -**Subject:** 

LGHTHP\_6\_ICEGEN [TSC1]

**Attachments:** EDAS TelemetryExemptionRequestForm 4-14-2025.docx

Dear Mr. Lee.

ICEGEN remains in outage due to a loss of telemetry communication between the power plant and CAISO. The source of the issue is a cut in the telephony transmission lines underground.

ICEGEN continues to have our gas line flanges in place, precluding the pumping of natural gas.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: Michael Munoz

Sent: Monday, April 14, 2025 5:39 PM

To: EDAS < EDAS@caiso.com>

Cc: Jaeger, Quintin <QJaeger@tnsk.com>; Thomas J Lee <tlee2@aqmd.gov>

Subject: FW: NOTIFICATION OF NON-COMPLIANCE: Device ID - 5912141 for Resource ID - LGHTHP\_6\_ICEGEN

[TSC1]

Dear EDAS,

The trouble to our RIG encompasses all of our AT&T communication lines to our facility. There has been a physical cut in the actual wires somewhere underground. AT&T is attempting to access a manhole that has been welded shut, as they explain below. We are extending our request for exemption as a result.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: LE, HUNG T < hl2362@att.com> Sent: Monday, April 14, 2025 7:13 AM To: Eduardo Rodriguez < <a href="mailto:erodriguez@ches.biz">erodriguez@ches.biz</a>>

**Subject:** RE: AOTS # 333316016 || C8CCUSCA111-R01

Hi,

From the LEC ticket, it is a welded manhole that tech tried to access. No update over the weekend. I just do a 4<sup>th</sup> ESC to LEC for update.

Thanks Hung

## **Hung Le**

Sr Specialist Network Technology Support

# AT&T Services, Inc.

4625 Creekstone Dr, Durham NC 27703 919-864-3085 O | 919-523-1413 M | hl2362@att.com

From: Jaeger, Quintin < QJaeger@tnsk.com>
Sent: Monday, April 14, 2025 3:00 PM
To: CarsonDist < CarsonDist@tnsk.com>

Subject: FW: NOTIFICATION OF NON-COMPLIANCE: Device ID - 5912141 for Resource ID -

LGHTHP 6 ICEGEN [TSC1]

From: EDAS < EDAS@caiso.com > Sent: Monday, April 14, 2025 1:59 PM

 $\textbf{To:} \ Settlement \ Users < \underline{SettlementUsers@tnsk.com} >; \ Settlement \ Users < \underline{SettlementUsers@tnsk.com} >; \\ Settlement \ \underline{SettlementUsers@tnsk.com} >; \\ Set$ 

TPSPrimaryContacts <TPSPrimaryContacts@tnsk.com>; TPSPrimaryContacts

<TPSPrimaryContacts@tnsk.com>; TPS CAISO <TPS CAISO@tnsk.com>; 'ogoldstein@ches.biz'

<ogoldstein@ches.biz>; 'manuel@duran-cedillo.com' <manuel@duran-cedillo.com>

Cc: EDAS < EDAS@caiso.com>

Subject: NOTIFICATION OF NON-COMPLIANCE: Device ID - 5912141 for Resource ID - LGHTHP\_6\_ICEGEN

[TSC1]

# Caution: External email, think before you click!

To Whom It May Concern:

This is an auto generated email. If you have responded to this current issue, please <u>disregard.</u>

This letter is to inform you that we have been unable to communicate with **Meter Device ID:5912141** associated with **Resource ID: LGHTHP\_6\_ICEGEN** as of 3/25/2025. This issue may currently be preventing us from submitting accurate meter data on your behalf used within the settlement process.

According to Tariff section 10.2.13.2 Repairs: 'If a revenue quality meter of a CAISO Metered Entity requires repairs to ensure that it operates in accordance with the requirements of the

CAISO Tariff and the applicable Business Practice Manuals, the CAISO Metered Entity must immediately notify the CAISO of the need for repairing that meter and must ensure that those repairs are completed in accordance with the applicable Business Practice Manual'

- If this is a Main Meter without a Certified Backup: Meter data will not be posted in MRIS until the communication issue is resolved. If estimated time of repair is greater than 15 days, please submit an <u>exemption</u> request along with a current supporting Hand Held Format (HHF) file.
- If there is a Certified Backup Meter Please reply to this notification stating you wish to use data from the backup meter.
- If this is a Certified Backup Meter The site is at risk of settlement consequences if the main meter should fail.

Failure to respond within 30-days of the initial notice may result in decertification of the meter(s) or revocation of the Certificate of Compliance.

Please note: If the Generator Owner is hiring a meter maintenance company to pull the HHFs, that company must be listed on the Schedule 3 of the Meter Service Agreement for the ISO Metered Entity.

For questions or assistance regarding this letter please contact one of our Energy Data

\*\*\*\*\*

The foregoing electronic message, together with any attachments thereto, is confidential and may be legally privileged against disclosure other than to the intended recipient. It is intended solely for the addressee(s) and access to the message by anyone else is unauthorized. If you are not the intended recipient of this electronic message, you are hereby notified that any dissemination, distribution, or any action taken or omitted to be taken in reliance on it is strictly prohibited and may be unlawful. If you have received this electronic message in error, please delete and immediately notify the sender of this error.

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From: Michael Munoz

**Sent:** Friday, April 18, 2025 10:38 PM

To: Thomas J Lee

**Cc:** Albert Dietz; Daniel Gonzalez

**Subject:** FW: Telemetry Exemption for LGHTHP\_6\_ICEGEN - IRG137 Expires TODAY, 4/18/2025

Attachments: EDAS TelemetryExemptionRequestForm 4-18-2025.docx

Dear Mr. Lee,

We have been informed by AT&T that our copper modem line (government service) and our T-1 CAISO line have been cut in multiple places underground. Please see below where we inform EDAS of the findings.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: Michael Munoz

**Sent:** Friday, April 18, 2025 6:37 PM **To:** EDAS <EDAS@caiso.com>

Cc: Jaeger, Quintin <QJaeger@tnsk.com>; Eduardo Rodriguez <erodriguez@ches.biz>; Albert Dietz

<adietz@ches.biz>

Subject: Telemetry Exemption for LGHTHP\_6\_ICEGEN - IRG137 Expires TODAY, 4/18/2025

Dear EDAS,

AT&T ticket PG49S831remains open. AT&T reports multiple cuts along the underground hardwire to the LGHTHP 6 ICEGEN plant. AT&T has provided no date for resumption of service.

Michael Munoz
Carson Hybrid Energy Storage
17171 Central Ave.
Carson, CA 90746
406-544-3326

701-779-9705 Conference call

From: EDAS < EDAS@caiso.com > Sent: Friday, April 18, 2025 3:14 PM

**To:** 'rshever@ches.biz' <<u>rshever@ches.biz</u>>; '24hour@ches.biz' <<u>24hour@ches.biz</u>>; Michael Munoz <mmunoz@ches.biz>; Michael Munoz <mmunoz@ches.biz>

**Cc:** EDAS < <u>EDAS@caiso.com</u>>; 'TPSPrimaryContacts@tnsk.com' < <u>TPSPrimaryContacts@tnsk.com</u>>;

'TPSPrimaryContacts@tnsk.com' <TPSPrimaryContacts@tnsk.com>; Tenaska CAISO

From: Michael Munoz

Sent: Wednesday, April 30, 2025 2:21 PM

To: Thomas J Lee

**Cc:** Albert Dietz; Daniel Gonzalez **Subject:** Facility 186899 ICEGEN

Dear Mr. Lee,

We remain disconnected from our SCE telemetry and AQMD RTU based on an AT&T line cut in multiple locations.

Our gas disconnects flanges remain in place.

From: Michael Munoz

**Sent:** Friday, May 9, 2025 3:31 PM

To: Thomas J Lee

Cc:Daniel Gonzalez; Albert DietzSubject:ICEGEN Test Run 5-9-2025

**Attachments:** 5-6-2025 LA Times Copper thieves cut phone service.pdf

Dear Mr. Lee,

Trimark has informed us that our RIG is now showing all points of communication to the CAISO. Our copper line communication remains out. Please see the article from the Los Angeles Times indicating that our copper line outage is a citywide problem. We once again urge SCAQMD to move on from modem communication. Any SCAQMD enforcement actions concerning transmission will be addressed in Court.

Assuming we received permission from CAISO today, tomorrow we will remove our gas line caps and combust for 1 hour from 0800-0900.

1

Please let me know if you have any questions.

From: Michael Munoz

**Sent:** Wednesday, May 14, 2025 7:55 AM

**To:** Thomas J Lee; Albert Dietz; Daniel Gonzalez

**Subject:** ICEGEN Test Run Today 0800.

Dear Mr. Lee,

We did not end up running last weekend per our CAISO test ticket. We have submitted a test ticket for a run today, from 0800-0900. If approved and successful, this will be our first run since 28 August 2024.

If we do not run, we will restore our flanges until we ask CAISO for a new test ticket.

From: Michael Munoz

**Sent:** Wednesday, May 14, 2025 12:30 PM **To:** Thomas J Lee; Albert Dietz; Daniel Gonzalez

**Subject:** RE: ICEGEN Test Run Today 0800.

Dear Mr. Lee,

We were unsuccessful in resolving our issues during our test today. We have reinstalled our gas cut off flanges.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: Michael Munoz

Sent: Wednesday, May 14, 2025 7:55 AM

To: Thomas J Lee <tlee2@aqmd.gov>; Albert Dietz <adietz@ches.biz>; Daniel Gonzalez <dgonzalez@ches.biz>

**Subject:** ICEGEN Test Run Today 0800.

Dear Mr. Lee,

We did not end up running last weekend per our CAISO test ticket. We have submitted a test ticket for a run today, from 0800-0900. If approved and successful, this will be our first run since 28 August 2024.

If we do not run, we will restore our flanges until we ask CAISO for a new test ticket.

From: Michael Munoz

**Sent:** Thursday, June 5, 2025 4:35 PM

To: Thomas J Lee

Cc:Daniel Gonzalez; Albert DietzSubject:Facility 186899 ICEGEN-

Dear Mr. Lee,

Today we removed the natural gas flanges and test fired the ICEGEN plant to test our telemetry. CAISO EDAS reports all systems normal. SCE Lighthipe reports all systems normal. We are now ready to conduct our RATA test. We have contacted Montrose to schedule a RATA test.

AT&T has not restored our copper modem line to our CEMS computer. As we head into the summer run, what steps should we take to communicate our emissions that don't require an antiquated modem?

From: Michael Munoz

**Sent:** Friday, June 6, 2025 10:44 PM

To: Thomas J Lee

**Cc:** Adam Tavasolian; Daniel Gonzalez; Albert Dietz

**Subject:** RE: Facility 186899 ICEGEN-

Follow Up Flag: Follow up Flag Status: Follow up

Dear Mr. Lee,

Thank you for your email. I am not sure I understand your answers.

I don't understand why would we apply Missing Data Procedures? We are not subject to this Rule under the current situation, as communication via the approved coper line modem is broken. We are not likely to be subject to this Rule as we will ensure we attempt to transmit our data within 48 hours of a restored modem line.

I also don't know what we would file a variance over. Would you please elaborate on what relief we would be seeking? In her most recent testimony, Ms. Manwaring pointed out that a variance would only be appropriate if we were in violation of a Rule or were imminently in violation of a Rule. This situation is not the case, as I described above.

We have been working with our CEMS provider to ensure our data is stored in an AQMD approved database. We have been assured that that is the case as AQMD has approved CEMTEK to provide such products, which we license.

Reference your comment "work with your CEMS vendors to explore methods to collect stored CEMS data and transmit the data", that is the direct request of my previous email. I apologize if I was not clear. Working with CEMTEK, we know that we can transmit our data via the internet as a database. However, we do not believe such methods are defined in the Rules. That is the purpose of my asking you, as a representative of AQMD, what an alternative method of transmitting our data would be acceptable.

Now that our flanges have been removed, we are subject to generation at any time and for any duration. How do we work together in the face of AT&T's systemic issue to get AQMD the data it required to ensure ICEGEN is meeting its permit obligations?

From: Thomas J Lee <tlee2@aqmd.gov>
Sent: Friday, June 6, 2025 7:03 PM
To: Michael Munoz <mmunoz@ches.biz>

Cc: Adam Tavasolian <atavasolian@aqmd.gov>; Daniel Gonzalez <dgonzalez@ches.biz>; Albert Dietz

<adietz@ches.biz>

Subject: RE: Facility 186899 ICEGEN-

Hello Mr. Munoz,

Glad to hear your plant is making progress to being fully operational again.

Regarding CEMS data transmittals, there are limited options. The first option is to apply MDP for the missing data; the second option would be to file a variance. I would also recommend that you inquire work with your CEMS vendors to explore methods to collect stored CEMS data and transmit the data.

Best,



# **Thomas Lee**

**Supervising Air Quality Inspector** 

South Coast Air Quality Management District Compliance and Enforcement 21865 Copley Drive, Diamond Bar CA 91765

PH: **(909) 396-2412** tlee2@aqmd.gov

From: Michael Munoz < mmunoz@ches.biz > Sent: Thursday, June 5, 2025 1:35 PM
To: Thomas J Lee < tlee2@aqmd.gov >

Cc: Daniel Gonzalez <dgonzalez@ches.biz>; Albert Dietz <adietz@ches.biz>

Subject: [EXTERNAL] Facility 186899 ICEGEN-

Dear Mr. Lee,

Today we removed the natural gas flanges and test fired the ICEGEN plant to test our telemetry. CAISO EDAS reports all systems normal. SCE Lighthipe reports all systems normal. We are now ready to conduct our RATA test. We have contacted Montrose to schedule a RATA test.

AT&T has not restored our copper modem line to our CEMS computer. As we head into the summer run, what steps should we take to communicate our emissions that don't require an antiquated modem?

From: Michael Munoz

Sent: Wednesday, June 11, 2025 3:54 PM

To: Thomas J Lee

Cc: Adam Tavasolian; Daniel Gonzalez; Albert Dietz

**Subject:** RE: Facility 186899 ICEGEN-

Dear Mr. Lee,

Please let me know AQMD's position so we can make timely arrangements.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326 701-779-9705 Conference call

From: Michael Munoz

**Sent:** Friday, June 6, 2025 10:44 PM **To:** Thomas J Lee <tlee2@aqmd.gov>

Cc: Adam Tavasolian <atavasolian@aqmd.gov>; Daniel Gonzalez <dgonzalez@ches.biz>; Albert Dietz

<adietz@ches.biz>

Subject: RE: Facility 186899 ICEGEN-

Dear Mr. Lee,

Thank you for your email. I am not sure I understand your answers.

I don't understand why would we apply Missing Data Procedures? We are not subject to this Rule under the current situation, as communication via the approved coper line modem is broken. We are not likely to be subject to this Rule as we will ensure we attempt to transmit our data within 48 hours of a restored modem line.

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We have been working with our CEMS provider to ensure our data is stored in an AQMD approved database. We have been assured that that is the case as AQMD has approved CEMTEK to provide such products, which we license.

Reference your comment "work with your CEMS vendors to explore methods to collect stored CEMS data and transmit the data", that is the direct request of my previous email. I apologize if I was not clear. Working with CEMTEK, we know that we can transmit our data via the internet as a

From: Michael Munoz

**Sent:** Wednesday, June 11, 2025 3:53 PM

To: Thomas J Lee

**Cc:** Albert Dietz; Daniel Gonzalez

**Subject:** ICEGEN Fac #-186899

Dear Mr. Lee,

We have scheduled our RATA and 3 Year for 15 July 2025. We will start generating at appx 1800 hours.

From: Michael Munoz

Sent: Wednesday, July 16, 2025 5:18 PM

To: Thomas J Lee

Cc: Adam Tavasolian; Albert Dietz; Daniel Gonzalez

**Subject:** Enery ICEGEN RATA- 186899

**Attachments:** 3Q25 ENERY ICEGEN 186899 RATA.pdf

Dear Mr. Lee,

Please find the results of our RATA completed in support of our Hearing Board variance Petition Hearing Board 6248-2. As you can see, our systems and our emissions are operating optimally, and we have achieved incentive.

Michael Munoz Carson Hybrid Energy Storage 17171 Central Ave. Carson, CA 90746 406-544-3326

701-779-9705 Conference call