

1 HYDEE FELDSTEIN SOTO, City Attorney
(SBN 106866)
2 BENJAMIN F. CHAPMAN, General Counsel,
Water and Power (SBN 234436)
3 MELANIE A. TORY, Deputy City Attorney
(SBN 252387)
4 NICHOLAS J. KARNO, Deputy City Attorney
(SBN 210805)
5 221 North Figueroa Street, Suite 1000
Los Angeles, California 90012
6 Telephone: (213) 367-4500
Facsimile: (213) 367-4588
7 Email: Nick.Karno@ladwp.com

8 Attorneys for Petitioner
9 THE CITY OF LOS ANGELES, acting by and
through THE LOS ANGELES DEPARTMENT OF
10 WATER AND POWER

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

14 In the Matter of
15 THE CITY OF LOS ANGELES, acting by
and through ITS LOS ANGELES
16 DEPARTMENT OF WATER AND POWER,

17 [Facility I.D. No. 800193]

18 Petitioner,

19 vs.

20 SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

21 Respondent.
22

Case No. 1263-82

**JOINT STIPULATION TO PLACE
MATTER ON CONSENT CALENDAR**

Date: September 18, 2025
Time: Consent Calendar

24 We, the undersigned parties, hereby agree and stipulate as follows:

25 1. The Petitioner and Respondent agree to have this matter placed on the Hearing
26 Board's Consent Calendar on Thursday, September 18, 2025.
27
28

1 2. The Petitioner seeks a short variance from District Rules 203(b), 218(b)(2), 218.1,
2 2004(f)(1), and 3002(c)(1), and Permit Condition D82.4, as presented in the attached (Proposed)
3 Order.

4 3. The parties agree to have the Declaration of Shawn Kaul, Plant Manager for
5 Valley Generating Station, for the Petitioner admitted into evidence regarding this matter.

6 4. The parties have agreed on a set of Proposed Findings and Decision and a
7 Proposed Order that are attached.

8 5. The parties request the Hearing Board to decide this matter based upon the
9 documents submitted by the parties.

10 6. Respondent does not oppose the Petitioner's request for the granting of a variance
11 for the Petitioner.

12 7. The variance sought by the Petitioner is not expected to result in a violation of
13 Health and Safety Code Section 41700.

14 **SO STIPULATED**

15 **REVIEWED AND APPROVED BY:**

16 **FOR PETITIONER:**

17 Dated: September 18, 2025

18
19 By: *Nicholas J. Karno*
20 Nicholas J. Karno, Deputy City Attorney
21 Attorney for Petitioner

22 **FOR RESPONDENT:**

23 Dated: September 12, 2025

24
25 By: *Erika Chavez*
26 Erika Chavez
27 Principal Deputy District Counsel
28 South Coast Air Quality Management District