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THE CITY OF LOS ANGELES, acting by and through
ITS DEPARTMENT OF WATER
AND POWER

BEFORE THE HEARING BOARD OF THE

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of THE CITY OF LOS ANGELES, acting by and through ITS DEPARTMENT OF WATER AND POWER, [Facility I.D. No. 800193] Petitioner, vs. SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, Respondent.	**Case No. 1263-82** DECLARATION OF SHAWN KAUL FOR THE CITY OF LOS ANGELES, acting by and through ITS DEPARTMENT OF WATER AND POWER TO THE HEARING BOARD Date: September 18, 2025 Time: Consent Calendar

Petitioner, The City of Los Angeles, acting by and through its Department of Water and Power ("LADWP") hereby submits this Declaration of Shawn Kaul, Plant Manager, to the Hearing Board in support of the request for a short variance in this matter:

1. I currently serve as the Plant Manager for LADWP's Valley Generating Station ("VGS") and have been employed by LADWP for approximately 17 years. As part of my duties, I am involved

in ensuring our facility's compliance with its Title V permit. I am familiar with LADWP's petition for a short variance in the above-referenced matter and with the equipment that is subject to this petition.

2. LADWP is the largest municipal utility in the nation and supplies water and electric services to 3.8 million residents and businesses in the City of Los Angeles. As a vertically integrated power system, LADWP both owns and operates the majority of its generation, transmission, and distribution systems. A five-member Board of Water and Power Commissioners is appointed by the Mayor and establishes policy. Together, LADWP and the City of Los Angeles have been at the forefront of California utilities in adopting aggressive clean energy initiatives. To that end, LADWP has set goals to meet renewable energy targets, while at the same time maintaining reliable and cost-effective power supply for customers. The future of LADWP's energy supply has zero coal, expanded renewables, energy efficiency, clean energy projects, and dramatically reduced fossil fuel emissions.

3. Located in Sun Valley, LADWP's VGS consists of one simple cycle combustion turbine (Unit 5) and two combined cycle combustion turbines (Units 6 and 7) in combination with one steam turbine generator (Unit 8). These units generate a total of 596 MW (gross). VGS is capable of providing electricity to over 464,000 homes.

4. VGS is one of LADWP's four major power plants (along with Haynes, Harbor and Scattergood Generating Stations). Together, they support 3,607 MW of installed capacity. VGS Units 6, 7 and 8, which generate a total of 549 MW (gross), are a vital component in LADWP's portfolio of in-basin generating facilities accounting for 15.2% of LADWP's in-basin total generating capacity and helping to ensure voltage support and grid reliability.

5. Units 6, 7, and 8 are listed under Section D of VGS' Title V Permit to Operate. Units 6 and 7 are 164.2 MW (gross) GE Model 7241FA natural gas-fired combined cycle combustion turbines, which are equipped with a Selective Catalytic Reduction (SCR) system for control of NOx emissions, an oxidation catalyst for control of carbon monoxide (CO) and volatile organic compound (VOC) emissions and Continuous Emission Monitoring Systems (CEMS) to measure NOx and CO exhaust emissions. Units 6 and 7 work in tandem in combined cycle mode with Unit 8, which is a 220.5 MW (gross) GE-D11 steam turbine generator. All three units were commissioned in 2003.

6. Together, Units 6, 7, and 8 are important to LADWP because they provide a reliable and economical way to integrate a diversified energy portfolio while ensuring voltage support and grid

reliability for the LA basin. Because of their higher efficiency in combined cycle operations, these units run as baseload units and are critical to the stability of the entire LADWP power system.

7. While there are periodic maintenance inspections for the turbines and associated components, station personnel continuously inspect the equipment and monitor the status of the turbines throughout operation. Operations personnel write up faulty equipment notifications and issue work orders at the first sign of problems with equipment during operation. Routine inspection and repair of the generating unit equipment occur annually, with the last scheduled maintenance outage completed in March 2025 (Units 6 and 8) and June 2025 (Unit 7).

8. For Unit 6, the following tasks were conducted for scheduled inspection and repair from January 26, 2025 to March 9, 2025:

- Borescope inspection
- Turbine inlet and exhaust inspection
- HRSG and Steam Systems Inspection and repairs
- NOx and CO catalyst Inspection
- Balance of Plant Equipment Inspection and repair
- Generator inspection and repair

9. For Unit 7, the following tasks were conducted for scheduled inspection and repair from January 4, 2025 to June 1, 2025:

- Replacement of generator field rotor
- Replacement of generator seals, oil deflectors, and bearings
- Replacement of gas turbine rotor
- Replacement of gas turbine seals, oil deflectors, and bearings
- Replacement of combustion hardware (fuel nozzles, end caps, transition pieces, and combustion liners)
- Replacement of turbine hardware (Stages 1, 2 and 3 buckets, nozzles, and shroud blocks)
- Inspection and repair of exhaust diffuser

10. For Unit 8, the following tasks were conducted for scheduled inspection and repair from January 26, 2025 to March 9, 2025:

- Main Steam Stop and Control Valve Inspection and Repair (every 4 years)

- Intercept Reheat Stop and Control Valve inspection and repair (every 4 years)
- Condenser inspection and repair
- Generator inspection and repair

11. On August 24, 2025, the facility received an alarm indicating the presence of liquid within the generator. Operations verified the alarm and discovered seal leaks caused liquid to break through into the generator. This condition rendered Unit 8 steam turbine inoperable, as no liquid should be present in that compartment. The liquid was identified as oil, which is used to seal out hydrogen gas that is essential for proper steam turbine operation. Until repairs are completed, the Unit 8 steam turbine cannot be operated safely or reliably.

12. The CO RATA is primarily performed with the operation of Units 6 and/or 7 in combined-cycle mode, which is dependent on the availability of the Unit 8 steam turbine. At this facility, combined-cycle mode consists of operation of one or both Units 6 and 7 combustion turbines and the steam turbine in operation (Unit 8).

13. After an initial assessment, the status of the Unit 8 leak was estimated to require about five weeks to repair, which would extend the unit unavailability beyond the September 30, 2025 CO RATA deadline. Once this determination was made, the CO RATA tests that were originally scheduled for September 3, 2025 (Unit 6 pre-notification # 850878) and September 4, 2025 (Unit 7 prenotification #850879) were cancelled. With Unit 8 currently expected to return to service October 2025, the CO RATA tests will have to be performed after the third quarter deadline.

14. Listed below are the actions that the facility has completed and plans to perform on Unit 8 in order to bring the unit back in service and in compliance:

- Actions Completed:
  a. Open inspection ports and borescope generator (Oil residue was found primarily on turbine end (TE) and collector end (CE) TE/CE. Stator core appears dry as seen through inspection windows).
  b. Remove and inspect TE/CE hydrogen seals and oil deflectors (no abnormal damage was found on hydrogen seals).
  c. Inspect stator connection leads and terminals compartment (Oil was found in compartment)

- Actions Planned:
  a. Perform baseline electrical testing.
  b. Clean and wipe connection leads and terminal compartment.
  c. Remove and clean hydrogen coolers.
  d. Remove and clean upper End Bells.
  e. Remove and clean Inner End Shields.
  f. Clean and wipe End Windings.
  g. Clean and wipe generator belly and walls.
  h. Pump and clean oil from generator low point drains.
  i. Electrically re-test generator after cleaning.
  j. If electrical results are good, reassemble generator and place unit back in-service.

15. LADWP could be subject to a Notice of Violation for the entire duration that the CO RATA is not successfully performed. LADWP's ratepayers would then bear the expense of any resulting fines and penalties if the variance is not granted.

16. Units 6, 7, and 8 have been offline since August 24, 2025. Despite the temporary termination of the units' operation, LADWP will still require a variance for not meeting the CO RATA deadline. While this petition is seeking relief from complying with the CO RATA due date of September 30, 2025, LADWP recognizes that Units 6, 7, and 8 must be brought back to service as soon as practicable before the CO RATA can be conducted.

17. There will be no excess emissions since the units are not operational and not producing any emissions.

18. During the variance period, LADWP will continue to monitor and record emissions through CEMS, which will remain operational during the repairs.

19. LADWP intends to achieve compliance with Rule 218.1 by completing the Unit 8 repairs and bringing all three units back online as soon as practicable so that the CO RATAs can be conducted successfully and within the time period granted by the variance.

20. LADWP expects to achieve final compliance by December 31, 2025. The requested variance coverage of 90 days will allow sufficient time to perform the necessary repairs and validate the integrity of the repairs prior to returning the unit to normal operation and performing the CO RATA test.

21. Per Condition No. 1, Petitioner shall complete the repair of Steam Turbine Unit No. 8, connected to Gas Turbine Unit No. 6 & 7 (Device No. D143 & D152), expeditiously and provide a notification when the repair is complete to South Coast AQMD via email to AQ Inspector III Adam Tavasolian (ATavasolian@aqmd.gov), and Supervising AQ Inspector Thomas Lee (tlee2@aqmd.gov). Notification shall include:

a. Completion of repairs to Steam Turbine Unit No. 8, within seven (7) calendars days of completion;

b. Date and time of initial start-up of the repaired Steam Turbine Unit No. 8, Gas Turbine Unit No. 6 & 7, within 72 hours of start-up;

c. Date and time of the relative accuracy test audit (RATA) at least 10 calendar days prior to conducting the testing. If the testing must be rescheduled, notification will be made within 24 hours or one business day following the schedule change.

22. Per Condition No. 2, Petitioner shall not operate Steam Turbine Unit No. 8, Gas Turbine Unit No. 6 & 7 until repairs are complete. Demonstration of non-operation shall include:

a. No fuel flow to Gas Turbine Unit No. 6 & 7 based on a dedicated fuel flow meter;

b. Daily fuel flow meter readings from the date the variance is granted to the conclusion of the variance;

c. Providing daily fuel flow records to AQ Inspector III Adam Tavasolian (ATavasolian@aqmd.gov), and Supervising AQ Inspector Thomas Lee (tlee2@aqmd.gov) within 72 hours of conducting the RATA test.

23. Per Condition No. 3, Petitioner shall perform the relative accuracy test audit (RATA) within 14 operating days for each turbine after initial startup of repaired Steam Turbine Unit No. 8, but no later than the final compliance date.

24. Per Condition No. 4, Petitioner shall operate the Continuous Emissions Monitoring System (CEMS) to continuously monitor the exhaust from the Turbine Units No. 6 and No. 7 and record

all required parameters (i.e. NOx concentration, CO concentration, oxygen content, and fuel flow) for the duration of the variance period.

25. Per Condition No. 5, Petitioner shall provide records of recorded data of all required parameters from days of operation from the CEMS to AQ Inspector III Adam Tavasolian (ATavasolian@aqmd.gov), and Supervising AQ Inspector Thomas Lee (tlee2@aqmd.gov) within 14 calendar days of conducting the RATA test.

26. Per Condition No. 6, Petitioner shall conduct a daily calibration in accordance with Rule 218.1 (b)(2)(A) each day that Turbine Units No. 6 and No. 7 combusts any fuel.

27. Per Condition No. 7, Petitioner shall forward a copy of the completed CO RATA to the South Coast AQMD Source Testing within 45 days of completion.

28. Per Condition No. 8, Petitioner shall pay all applicable fees to the Clerk of Hearing Board, or the variance shall be invalidated pursuant to Rule 303(k), except for excess emissions fees, which shall be paid within fifteen (15) days of notification in writing that the fees are due, unless otherwise ordered by the Hearing Board.

29. Per Condition No. 9, Petitioner shall notify the Clerk of the Hearing Board at clerkofboard@aqmd.gov in writing when final compliance has been achieved.

30. Petitioner requests a short variance, beginning today and continuing to December 31, 2025, to allow the CO RATA for Units 6 and 7 to be conducted after September 30, 2025.

31. If the variance in this matter is granted, Petitioner will comply with the conditions set forth in the Order as required by the Hearing Board.

32. Operation under the order is not expected to result in a violation of Health and Safety Code Section 41700.

FOR THE LOS ANGELES DEPARTMENT OF WATER AND POWER:

Dated: 9-15-25

By: _____

Shawn Kaul
Plant Manager, Valley Generating Station