

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
PETITION FOR VARIANCE  
BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT  
CLERK OF THE BOARD

APR 20 9:54am

PETITIONER: LOS ANGELES REGIONAL INTEROPERABLE

CASE NO: 6234-6

COMMUNICATIONS SYSTEM JOINT POWERS AUTHORITY (LA-RICS AUTHORITY)

FACILITY ID: 195568

FACILITY ADDRESS: (APN) 2848-014-303 Santa Clara Truck Trail

*[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]*

City, State, Zip: Newhall, CA 91321

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☒ INTERIM    ☐ SHORT    ☒ REGULAR    ☒ EMERGENCY    ☒ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

<u>Nancy Yang</u>	<u>Riad ElMasri</u>
<u>2525 Corporate Place, Suite 200</u>	<u>2525 Corporate Place, Suite 200</u>
<u>Monterey Park, CA. Zip 91754</u>	<u>Monterey Park, CA. Zip 91754</u>
<u>( 323 ) 371-8852 Ext.</u>	<u>( 323 ) 881-8183 Ext.</u>
<u>Fax ( )</u>	<u>Fax ( )</u>

E-mail: nyang@isd.lacounty.gov/nancy.yang@la-rics.org E-mail riad.elmasri@la-rics.org

3. RECLAIM Permit    ☐ Yes    ☒ No    Title V Permit    ☐ Yes    ☒ No

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

This petition for variance is being filed due to potential violation of Permit to Operate Condition #4 for Permit No. G67048, Facility ID 195568 for the LA-RICS Loop Canyon (LPC) emergency generator. Condition #4 states that "this engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes".

As of April 29, 2025, total calendar year-to-date runtime of the emergency generator at the LA-RICS Authority's Loop Canyon (LPC) facility is **160** hours excluding the runtime of 289 hours from January 8 to February 6, 2025 when Southcoast AQMD Executive Order 25-01 (and as amended/extended by 25-01(a) and 25-01(b)) suspending rules pertaining to 200-hour limit for the operation of emergency generators were in effect. Total year-to-date generator runtime inclusive of the run hours during effective period of SCAQMD Executive Order 25-01, 25-01(a) and 25-01(b) is 449 hours. Of the 449 hours, 3.72 hours are for generator testing and maintenance.

The generator runtime to-date excluding the hours during SCAQMD Executive Order 25-01 (as amended/extended) **has not** exceeded the permitted annual operating limit of 200 hours. However, Southern California Edison has implemented a planned power outage associated with utility pole upgrade since April 24, causing the loss of commercial power at the LA-RICS LPC Loop Canyon facility. SCE's planned outage in progress is scheduled to continue through May 1, 2025. The emergency generator at the LA-RICS LPC Loop Canyon facility is therefore expected to continue to run through May 1, 2025 to keep supplying power to LA-RICS' Land Mobile Radio (LMR) public safety communications system so it stays operational and "on air".

Given the current year-to-date non-exempted generator runtime of 160 hours, if the SCE planned outage continues as scheduled, runtime for the LA-RICS LPC generator is expected to exceed 200 hours by May 1, 2025 and the annual 200-hour runtime limit stipulated in Permit to Operate Condition #4. Generator runtime may be further exceeded due to necessary testing and maintenance of the equipment and Edison's future planned maintenance outages and possible unforeseen, unplanned power outages between now and the end of the calendar year.

5. Briefly describe the type of business and processes at your facility.

The Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) System is a radio network dedicated entirely to emergency responders. LA-RICS' LMR System creates a unified web of communication, eliminates barriers to multi-jurisdictional responses and allows police, firefighters and paramedics to communicate directly with users outside of their agency.

Due to the use case of the network, it is imperative to public safety that the network stays online with power despite the SCE Public Safety Power Shutoffs (PSPS) and other planned power outages or unscheduled power outages resulting from utility infrastructure impacted by the wind events and wildfires so first responders will be able to maintain critical communications supporting public safety operations and serving impacted communities at a time when services are most needed.

LA-RICS Authority's LPC Loop Canyon communications site is equipped with a fixed emergency generator which will provide backup power to LA-RICS' public safety radio communications systems onsite and keep them operational when commercial utility power fails.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Emergency Generator (ICE Cummins, Model No. QSB5-G13, diesel fueled, 4-cylinders, turbocharged and aftercooled, rated at 173 BHP)	632660/ G67048		


\*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The emergency generator onsite provides backup power to radio equipment supporting mission-critical communication when utility power from SCE is lost.

The LA-RICS Authority is seeking variance for its emergency backup generator for the wireless communications facility operations. The LPC Loop Canyon facility provides land mobile radio and microwave communications for emergency public safety entities making it imperative that the system stays online, and the facility stays on-air during blackouts or other utility planned and unplanned power outages.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Annual Date of last maintenance and/or inspection February 10, 2025

Describe the maintenance and/or inspection that was performed.

Visual inspection was performed on the generator including battery and charger, cooling system, radiator, controls and accessories, alternator, fuel system, intake and exhaust, engine lubrication, oil and filter, and generator operations. Generator frequency and voltage, oil and fuel pressures were checked. Oil filter and fuel filter were replaced. No issues were found.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
203 (b) [Condition #4 of Facility Permit to Operate #G67048]	The generator shall not be operated more than 200 hours in any one year per Condition #4. However, the emergency generator potentially may exceed the runtime stipulated in the Permit to Operate (Condition #4) in the event of utility service provider's maintenance and unforeseen power outages.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation
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11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

LARICS Authority operates a radio network providing mission-critical wireless communication services for public safety emergency personnel throughout Los Angeles County. The radio network is required to stay "on air" 24/7 through the year to support radio communications for the LA region's first responders for law enforcement, fire service, and emergency medical services. When commercial utility power from SCE is lost, LA-RICS LPC site's automatic transfer switch starts and activates the emergency generator to continue supply of electricity to maintain radio system operation until utility power can be restored. There are several SCE power outages beyond LA-RICS Authority's control that occurred which accounted for the majority of generator run time to date. Included in Attachment 1 to this petition is a generator runtime report for the LA-RICS LPC emergency generator that annotated the individual utility power outages that occurred this year.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

As of April 21, total calendar year-to-date runtime of the emergency generator at the LA-RICS LPC Loop Canyon facility is 40 hours excluding the runtime of 289 hours during the South Coast AQMD's Executive

Order 25-01 (and as amended/extended) that suspended the permit conditions for ICE emergency generators limiting a generator's operation to 200 hours a year pursuant to the Governor declared State of Emergency. On Friday, April 24, the LA-RICS Loop Canyon's emergency generator started to run. On Monday April 28 and over the weekend, the emergency generator continued to run and upon tracking the cause, it was found that SCE has implemented a planned power outage which is expected to continue from April 28 through May 1, 2025. As of the time of this petition's preparation, Total year-to-date runtime for the LA-RICS LPC Loop Canyon emergency generator inclusive of the hours during utility provider's PSPS events and during the SCAQMD Executive Order is 449 hours. Excluding the 289 hours of generator runtime from January 8 to February 6 when SCAQMD Executive Order 25-01 (and as amended/extended) was in effect, the emergency generator runtime is 160 hours.

The generator runtime to date excluding the hours during the SCAQMD Executive Order 25-01 (and as amended/extended) has not exceeded the permitted annual operating limit of 200 hours. However, given the current year-to-date non-exempted generator runtime of 160 hours as of 9am on April 29, if the SCE planned outage that started on April 24 continues as scheduled, it is expected to result in total generator runtime exceeding 200 hours by May 1 which would exceed the limit stipulated in Permit to Operate Condition #4. Generator runtime may be further exceeded due to necessary operational testing and maintenance of the generator, and Edison's future planned maintenance outages and possible unforeseen, unplanned power outages until the end of the calendar year.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

As part of LA-RICS Authority's ongoing compliance effort, we have been actively monitoring generator runtime through our remote alarm and monitoring system which provides notification whenever utility power is lost and the automatic transfer switch transfers power to the emergency generator, and back to utility power.

In order to achieve continued compliance, we are submitting this variance petition to exceed the 200 hours limit in Condition #4 of the Permit to Operate in case of continued and additional SCE planned or unplanned power outages between now and end of the calendar year. We are unable to control the utility company's outage frequency or duration and can only monitor and request updates from SCE to confirm when power can be/is restored.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$  fines and penalties due to noncompliance

Number of employees laid off (if any):  N/A

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

If LA-RICS Authority is unable to operate the emergency generator during future power outages for the remainder of the year, it would pose a major public safety risk. Emergency services providers/first responders rely on the LA-RICS network for wireless communication extending throughout the remote regions of Los Angeles County. The LA-RICS land mobile radio system was used extensively by first responders during the Palisades, Eaton and other recent wildfires. Losing power for the LPC site would not only hurt coverage for the localized area but would hurt system performance and reliability for the rest of the county due to critical microwave links this site provides.

If variance is not granted, the LA-RICS land mobile radio system, being a mission-critical communications system supporting first responder radio communications for daily operation and emergency responses countywide and for which it is imperative to stay "on air", would need to continue operation with backup power during utility power outages, and LA-RICS Authority would incur fines and penalties.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

As a public safety critical operation there is no ability for the LA-RICS land mobile radio system to terminate operations. The system needs to stay online to provide law enforcement, fire, and emergency medical services with the ability to communicate. The emergency generators are programmed and setup to immediately shut down upon restoration of utility power using an automatic transfer switch.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
NOx (Oxide of Nitrogen as NO <sub>2</sub> ; 3.22 grams/bhp-hr)	29.47	0	29.47
HC (Total Unburned Hydrocarbons; 0.26 grams/bhp-hr)	2.37	0	2.37
PM (Particulate Matter; 0.27 grams/bhp-hr)	2.47	0	2.47
CO (Carbon Monoxide; 1.53 grams/bhp-hr)	14.00	0	14.00
At this time, there is no excess emission as the LPC ICE emergency generator has not yet exceeded 200 hours of operation.			

\* Column A minus Column B = Column C

Excess Opacity:       N/A       %

20. Show calculations used to estimate quantities in No. 19. or explain why there will be no excess emissions.

At this time, there is no excess emission as the LPC ICE emergency generator has not yet exceeded 200 hours of operation. When the 200 hours operations are exceeded, below are the calculations that will be used to estimate quantities in No. 19.

**Pollutant values converted from grams/bhp-hr to lbs/bhp-hr x 24 hours x Generator BHP**

NOx = (3.22 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 173 bhp = 29.47 lbs/day  
HC = (0.26 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 173 bhp = 2.37 lbs/day  
PM = (0.27 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 173 bhp = 2.47 lbs/day  
CO = (1.53 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 173 bhp = 14.00 lbs/day

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

The LA-RICS LPC site is a critical infrastructure for public safety communications and emergency response, and the LA-RICS Authority cannot disable the power infrastructure as the LA-RICS LMR System needs to stay online in order to provide emergency services providers/first responders the ability to communicate. Generators are programmed and set up to immediately shut down upon restoration of utility power using an automatic transfer switch. Outside of 15-minute weekly maintenance functional testing and minor preventive maintenance work, excess emissions will drop to zero upon restoration of utility power.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Generator usage and utility power status will continue to be monitored by our alarm and monitoring system allowing for updates on total hourly usage to be supplied for any required frequency. Please see Attachment 1 to this Petition for the annotated generator runtime report showing the generator runtime, date and time the equipment ran, and the reason that it ran for the LA-RICS LPC site for this calendar year.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

LA-RICS is seeking a variance on AQMD Permit to Operate # G67048 Condition No. 4 which states that "This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes." Resolution to the potential violation for this limit is dependent on availability and restoration of SCE's utility power and probability of future power outages for the remainder of 2025 which LA-RICS Authority has no control over.

24. State the date you are requesting the variance to begin: April 29, 2025; and the date by which you expect to achieve final compliance: December 31, 2025.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

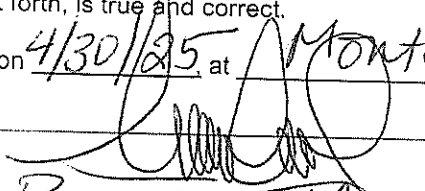
25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

\_\_\_\_\_  
Ext. \_\_\_\_\_  
\_\_\_\_\_  
Ext. \_\_\_\_\_

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Name	Company	Title
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The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 4/30/25 at Monterey Park, CA  
Signature  Print Name Riad A. ELMASRI  
Title: Program Manager





South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
**PERMIT TO OPERATE**

Page 1  
Permit No.  
G67048  
A/N 632660

This initial permit must be renewed **ANNUALLY** unless the equipment is moved, or changes ownership.  
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

Legal Owner  
or Operator:

LARICS LPC LMR  
725 S FIGUEROA ST, SUITE 1855  
LOS ANGELES, CA 90017

ID 195568

Equipment Location: 16482U SANTA CLARA TRUCK TRAIL SANTA CLARITA, CA 91321

**Equipment Description :**

Internal Combustion Engine, Cummins Model No. QSB5-G13, Diesel-Fueled, 4-Cylinder, Turbocharged and Aftercooled, rated at 173 BHP, Driving an Emergency Electrical Generator.

**Conditions :**

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. An operational non-resettable totalizing timer shall be installed and maintained to indicate the engine elapsed operating time.
4. This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes.
5. Operating beyond the 50 hours per year allotted for maintenance and testing purposes shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the utility distribution company has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage. Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.
6. This engine shall not be used as part of a demand response program using interruptible service contract in which a facility receives a payment or reduced rates in return for reducing its electric load on the grid when requested to so by the utility or the grid operator.
7. The operator shall keep a log of engine operations documenting the total time the engine is operated each month and specific reason for operation as:
  - A. Emergency use.
  - B. Maintenance and testing.
  - C. Other (describe the reason for operating).



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21865 Copley Drive, Diamond Bar, CA 91765-4178  
**PERMIT TO OPERATE**

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In addition, each time the engine is manually started, the log shall include the date of operation, the specific reason for operation, and the totalizing hour meter reading (in hours and tenths of hours) at the beginning and end of operation

8. On or before January 15th of each year, the operator shall record in the engine operating log the following:
- A. The total hours of operation for the previous calendar year, and
  - B. The total hours of engine operation for maintenance and testing for the previous calendar year.

Engine operating log shall be retained on site for a minimum of three calendar years and shall be made available to the South Coast AQMD representative upon request.

9. This engine shall comply with all applicable requirements of Rules 431.2 and 1470.

10. This engine shall comply with the following emission limits:

NMHC + NOx: 3.0 g/bhp-hr  
CO: 3.7 g/bhp-hr  
PM: 0.15 g/bhp-hr

11. Sulfur content of diesel fuel supplied to the engine shall not exceed 15 ppm by weight.



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21865 Copley Drive, Diamond Bar, CA 91765-4178  
**PERMIT TO OPERATE**

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**NOTICE**

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

BY JASON ASPELL/SB07  
11/30/2021



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VARIANC PETITION ATTACHMENT 1 (FOR APPLICATION QUESTIONS 14, 15 AND 22)  
LA-RICS LOOP CANYON (LPC) 2025 EMERGENCY GENERATOR YEAR-TO-DATE RUN HOURS

AQMD Facility ID #	Alert Description - Reason for Generator Run	Start	Stop	Duration(sec.)	Duration(min.)	Duration(hr.)	Cumulative(hr.)	Maintenance/Testing YTD Runtime (hr.)	AQMD PSPS Notification Number
195568									
LPC-NG	Generator: Online- Weekly Test	1/6/2025 7:58	1/6/2025 8:13	889	15	0.2469	0.2469		
LPC-NG	Generator: Online- SCE PSPS Event	1/7/2025 4:51	1/7/2025 4:56	298	5	0.0828	0.3297	0.25	
LPC-NG	Generator: Online- SCE PSPS Event	1/7/2025 22:11	1/7/2025 22:27	935	16	0.2597	0.5894		
LPC-NG	Generator: Online- SCE PSPS Event	1/7/2025 22:27	1/15/2025 12:37	655791	10930	182.1642	182.7536		
LPC-NG	Generator: Online- Weekly Test	1/15/2025 12:39	1/16/2025 14:51	94305	1572	26.1958	208.9494		
LPC-NG	Generator: Online- SCE PSPS Event	1/20/2025 7:58	1/20/2025 8:13	908	15	0.2522	209.2017	0.25	823986
LPC-NG	Generator: Online- SCE PSPS Event	1/20/2025 23:10	1/22/2025 10:01	125458	2091	34.8484	244.0511		
LPC-NG	Generator: Online- Weekly Test	1/22/2025 12:15	1/24/2025 10:32	166633	2777	46.2869	290.3381		
LPC-NG	Generator: Online- Weekly Test	1/27/2025 7:58	1/27/2025 8:13	883	15	0.2453	290.5833	0.25	
LPC-NG	Generator: Online- Weekly Test	2/3/2025 7:58	2/3/2025 8:13	880	15	0.2444	290.8278	0.24	
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 7:58	2/10/2025 8:13	906	15	0.2517	291.0794	0.25	
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 10:50	2/10/2025 10:51	59	1	0.0164	291.0958		
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 11:19	2/10/2025 11:20	33	1	0.0092	291.105		
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 11:26	2/10/2025 11:40	866	14	0.2406	291.3456		
LPC-NG	Generator: Online- Weekly Test	2/10/2025 11:41	2/10/2025 11:41	5	0	0.0014	291.3469		
LPC-NG	Generator: Online- Weekly Test	2/17/2025 7:58	2/17/2025 8:12	879	15	0.2442	291.5911	0.24	
LPC-NG	Generator: Online- Weekly Test	2/24/2025 7:58	2/24/2025 8:12	884	15	0.2456	291.8367	0.25	
LPC-NG	Generator: Online- Weekly Test	3/3/2025 7:57	3/3/2025 8:12	903	15	0.2508	292.0875	0.25	
LPC-NG	Generator: Online- Weekly Test	3/10/2025 7:57	3/10/2025 8:12	880	15	0.2444	292.3319	0.24	
LPC-NG	Generator: Online- SCE Planned Power Outage	3/17/2025 7:57	3/17/2025 8:12	882	15	0.245	292.5769	0.25	
LPC-NG	Generator: Online- SCE Planned Power Outage	3/18/2025 8:22	3/18/2025 17:50	34051	568	9.4614	302.0383		
LPC-NG	Generator: Online- SCE Planned Power Outage	3/21/2025 8:05	3/21/2025 17:07	32510	542	9.0306	311.0689		
LPC-NG	Generator: Online- Weekly Test	3/24/2025 7:57	3/24/2025 8:12	905	15	0.2514	311.3203	0.25	
LPC-NG	Generator: Online- Weekly Test	3/31/2025 7:57	3/31/2025 8:12	891	15	0.2475	311.5678	0.25	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/7/2025 7:57	4/7/2025 8:12	878	15	0.2439	311.8117	0.24	
LPC-NG	Generator: Online- Weekly Test	4/8/2025 8:16	4/8/2025 16:35	29926	499	8.3128	320.1244		
LPC-NG	Generator: Online- SCE Planned Power Outage	4/14/2025 7:57	4/14/2025 8:12	905	15	0.2514	320.3758	0.25	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/15/2025 8:08	4/15/2025 13:19	18665	311	5.1847	325.5605		
LPC-NG	Generator: Online- SCE Planned Power Outage	4/18/2025 8:01	4/18/2025 11:27	12378	206	3.4383	328.9989		
LPC-NG	Generator: Online- Weekly Test	4/21/2025 7:57	4/21/2025 8:12	908	15	0.2522	329.2511	0.25	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/24/2025 9:25	4/29/2025 9:00	430452	7174	119.5728	448.8239		
						Runtime Hours Under SCAQMD Executive Order 25-01 thru 25-01(b) effective 1/8/2025 to 2/6/2025:	289.2329		
						Total Net Hours YTD Excluding the above:	159.591	3.72	

round to 160