

South Coast Air Quality Management District

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COMPLIANCE ADVISORY

Date: November 12, 2019

To: All Owners/Operators of Emergency Generators Subject to Requirements of

South Coast AQMD Rule 1110.2 - Emissions from Gaseous - and Liquid-Fueled Engines

Subject: Wildfire Mitigation Plan Prospective Public Safety Power Shutoff (PSPS) Events

Under South Coast AQMD Rule 1110.2¹, emergency standby engines are limited to 200 hours per year of operation, and may be exempted from further emission limits. Rule 1110.2(i)(1)(B). The 200 hours per year operation limit must be incorporated into the facility's permit to operate. *Id*.

On January 1, 2019, SB 901 became effective, requiring electrical utilities to create Wildfire Mitigation Plans, including consideration of deenergizing portions of the electrical system grid where conditions dictate.

On May 30, 2019, the California Public Utilities Commission approved Wildfire Mitigation Plans for several large utilities and transmission owners, including Southern California Edison (SCE), which serves portions of the South Coast Basin.² As required by SB 901, SCE's Wildfire Mitigation Plan includes prospective Public Safety Power Shutoff (PSPS) events, where weather conditions in fire prone areas require. Per SCE's Plan, SCE will provide 2-day advance notice of such an event to affected users.

Existing regulations allow for the use of emergency standby engines, up to the 200 hour per year limit, during the event of a scheduled or rotating power outage under certain conditions. South Coast AQMD considers such power outages to include PSPS events. Under the Statewide Airborne Toxic Control Measure and District Rules, emergency standby engines may only be used during rotating outages if all the following criteria are met:

- (A) the engine's permit to operate allows operation of the engine in anticipation of a rotating outage; and
- (B) the Utility Distribution Company has ordered rotating outages in the control area where the engine is located, or has indicated it expects to issue such an order at a certain time; and
- (C) the engine is located in a specific location that is subject to the rotating outage; and
- (D) the engine is operated no more than 30 minutes prior to the time when the Utility Distribution Company officially forecasts a rotating outage in the control area; and
- (E) the engine operation is terminated immediately after the Utility Distribution Company advises that a rotating outage is no longer imminent or in effect.

17 CCR § 93115.6(b)(1); see also Rule 1470(c)(2)(B).

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¹ All SCAQMD Rules are available at http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book.

² All approved Wildfire Mitigation Plans can be accessed from the California Public Utilities Commission website at https://www.cpuc.ca.gov/SB901/.

Note that additional requirements apply for engines enrolled in a Demand Response Program (DRP) using an Interruptible Service Contract. See Rule 1470 for applicable requirements for DRP engine use, including during a rotating outage.

As part of ongoing planning and monitoring of hourly use of emergency standby engines, the South Coast AQMD strongly advises all affected permittees to incorporate the potential power shutoff events into the facility's planning process. If it becomes likely that your facility will exceed its 200 permitted hours for any reason, including PSPS events, you may petition the Hearing Board for a variance from the 200-hour permit condition according to South Coast AQMD Rules. See Rule 503. For questions regarding the variance process, contact the South Coast AQMD General Counsel's Office at 909-396-3400 and ask to speak with the Duty Deputy.