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10 Attorneys for Petitioner  
11 *B. BRAUN US PHARMACEUTICAL MANUFACTURING LLC.*

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

14 In the Matter of  
15 B. BRAUN US PHARMACEUTICAL  
16 MANUFACTURING LLC,  
17  
18 Petitioner,  
19  
20 v.  
21  
22 SOUTH COAST AIR QUALITY  
23 MANAGEMENT DISTRICT,  
24  
25 Respondent.

26 CASE NO. 4780-5  
27 FACILITY ID NO. 117290  
28  
**SUPPLEMENTAL DECLARATION OF  
ANIEKAN UDOBOT IN SUPPORT OF B.  
BRAUN US PHARMACEUTICAL  
MANUFACTURING LLC'S PETITION FOR  
MODIFICATION / EXTENSION OF A  
FINAL COMPLIANCE DATE**  
**Date:** October 24, 2024  
**Time:** 9:30 AM  
**Location:** 21865 Copley Drive  
Diamond Bar, CA 91765

1 I, Aniekan Udobot, declare:

2 1. This is a supplemental declaration to the Declaration of Aniekan Udobot in Support of  
3 B. Braun US Pharmaceutical Manufacturing LLC's Petition for Modification/Extension of a Final  
4 Compliance Date, which was filed with the SCAQMD Hearing Board, in Case No. 4870-5, on August  
5 30, 2024.

6 **Status Update on Fuel Cells Project**

7 2. As discussed in my August declaration, I work in the Department which oversees  
8 efforts to replace the Irvine Facility's Cogens with two Bloom Fuel Cells. In my capacity as Senior  
9 Project Manager II for the Fuel Cells project, I am responsible for coordinating the project, including  
10 regularly interacting with Bloom and other project stakeholders, including SCE.

11 3. As of October 17, 2024, work on the Fuel Cells project has progressed such that the  
12 project remains on schedule for completion, consistent with the Variance requirements as approved  
13 by the Hearing Board, with the exception of the delay addressed by Pharma's request for an extension.  
14 As reflected in Pharma's third variance progress report, which was submitted to Air Quality Inspector,  
15 Paulo Longoni, on October 3, 2024, Fuel Cell installation at the Irvine Facility is mechanically  
16 complete and all construction activities associated with Fuel Cell installation are finished. The site  
17 gas infrastructure is also completed, and natural gas is available to all systems. The Fuel Cells are  
18 electrically connected to their respective interconnection points and the local AHJ (the City of Irvine)  
19 has approved the site for energization. At the end of August 2024, when the petition for an extension  
20 was filed, Pharma anticipated that the Switchyard B Fuel Cell would commence operations on October  
21 4, 2024, with microgrid transfer completed by October 31, 2024. However, SCE is continuing to  
22 review relay protection settings for the Fuel Cell and final testing activities at Switchyard B are  
23 ongoing, such that final permission to operate the Switchyard B Fuel Cell has not yet been granted by  
24 SCE. This delay – which is wholly outside Pharma's control – does not materially impact the Irvine  
25 Facility's ability to meet the amended compliance deadlines for the Fuel Cells project, as proposed in  
26 Pharma's petition for an extension of the Variance.

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1 4. The photographs attached hereto as **Exhibit A** and **Exhibit B** provide a true and  
2 accurate representation of the Fuel Cell yard at the Irvine Facility as of October 17, 2024. I took these  
3 photographs on September 11, 2024, after mechanical installation of the Fuel Cells was completed.  
4 The structure of the Fuel Cell yard will not materially change, now that mechanical installation is  
5 complete, although additional progress is required on other outstanding aspects of the project, as  
6 discussed in this declaration.

7 **Status Update on SCE Yard Upgrades**


8 5. As discussed in my August declaration, SCE is requiring upgrades to its onsite yard  
9 adjacent to Switchyard A before it will approve interconnection of the Switchyard A Fuel Cell to the  
10 SCE grid. The Fuel Cells cannot operate as a replacement of the Turbines until SCE completes its  
11 interconnection work.

12 6. Pharma is continuing to work with SCE in order to timely complete required upgrades  
13 at the SCE yard. As of October 17, 2024, I and my team at the Irvine Facility remain optimistic that  
14 the December 24 energization date in the SCE Timeline is achievable. So far, yard upgrade work is  
15 on track. Pharma has completed all pre-construction customer requirements (SCE Timeline: Step 3),  
16 with only its obligations relating to underground ducts/structures and existing meter removal  
17 remaining. Construction of underground ducts/structures will begin on November 29, 2024, after SCE  
18 removes existing equipment and cabling at its onsite yard, and Pharma's request for existing meter  
19 removal will be fulfilled during the November 28, 2024, outage (discussed in further detail, below).  
20 SCE has conducted an onsite walkthrough and obtained all materials and SCE staffing necessary to  
21 perform the yard upgrades (SCE Timeline: Step 4). As discussed in the next paragraph, SCE is  
22 scheduled to complete job construction and energization of the switchgear at Switchyard A by  
23 December 24 (the first item in SCE Timeline: Step 5).

24 7. Two electrical outages have been scheduled at the Irvine Facility in order to complete  
25 the SCE yard upgrades. During an initial outage, on November 28, 2024, SCE's onsite yard will be  
26 prepared for renovation. During a second outage, on December 24, 2024, new equipment installation  
27 at the SCE yard will be completed, at which point Switchyard A will be reconnected to the grid and  
28

1 reenergized. Final testing and relay protection setting approval for the Switchyard A Fuel Cell will  
2 occur after the December 24 outage.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing  
4 is true and correct. Executed this 17th day of October, 2024, at Irvine, California.

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7 ANIEKAN UDOBOT  
8 Senior Project Manager II  
9 Pharma

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# EXHIBIT A

Photograph # 1 of Irvine Facility Fuel Cell Yard



# **EXHIBIT B**

**Photograph # 2 of Irvine Facility Fuel Cell Yard**

