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BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

WALNUT CREEK ENERGY LLC
[Facility ID No. 146536],

 Petitioner,

 v.

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT.

 Respondent.

Case No. 6230-3

**DECLARATION OF GEORGE
PIANTKA RE: SHORT VARIANCE
PETITION; FILED IN SUPPORT OF
CONSENT CALENDAR**

Hearing Date: August 1, 2024
Time: 9:30 a.m.
Place: South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

I, George Piantka, declare:

1. I am the Senior Director for NRG Energy, which operates Walnut Creek Energy Park (“Facility”). If called as a witness, I could testify to the following based on personal knowledge.
2. For the past 9 years I have served as the Senior Director of Regulatory Environmental Services at NRG Energy, which operates Walnut Creek Energy, a 500 MW natural gas-fired power plant powered by five (5) General Electric (GE) LMS100 simple cycle gas turbines.
3. I am familiar with and have reviewed the petition filed in Case No. 6230-3, and with the issues presented in the petition related to the proposed replacement of a supercore in Unit 4 at the Facility.
4. I am familiar with Unit 4 at the facility being taken out of service (outage) and efforts by the Facility to restore operation by repairing the supercore primarily used in this equipment. I am also aware that the Facility holds a Title V (federal operating) permit under Facility ID No.

1 146536, which contains Permit Condition E448.3 that allows the facility to only use supercore
2 serial numbers (S/Ns) listed as part of the “site fleet.”

3 5. I am aware of the following events. On June 26, 2024, Gas Turbine Unit 4 (Device
4 D19) tripped and was forced out of service (into outage). On June 28, 2024, Walnut Creek
5 Energy, LLC (WCE) learned that the supercore (S/N 878-149) in Unit 4 sustained a bearing
6 failure, and consequently the forced outage has been extended until the damaged supercore can be
7 repaired, or a replacement supercore is available. I am aware of the Facility’s interest to use a
8 functionally equivalent supercore (S/N 878-187) to restore Unit 4 operations during the 2024
9 summer months.

10 6. I am aware supercore S/N 878-187 is not currently part of the site fleet listed in Permit
11 Condition E448.3, and therefore use of this supercore S/N in Unit 4 would be a violation of this
12 condition. Permit Condition E448.3 requires that only GE LMS100PA-NGWG06 turbine engines
13 with the following supercore serial numbers be used at the Facility:

- 14 878-146 (manufacture date 2012),
- 15 878-147 (manufacture date 2012),
- 16 878-148 (manufacture date 2012),
- 17 878-149 (manufacture date 2012),
- 18 878-157 (manufacture date 2012), and
- 19 878-160 (manufacture date 2012).

20 7. The Facility’s spare supercore (S/N 878-160) is currently being repaired. The Facility
21 seeks relief from this condition to operate a spare supercore (S/N 878-187), which would be
22 obtained from the Carlsbad Energy Center (Carlsbad), a sister facility located in Carlsbad, CA
23 under common corporate ownership as the Facility. The Facility seeks to operate the spare
24 Carlsbad supercore (S/N 878-187) beginning on or around August 1, 2024, until the date on which
25 the Facility’s spare (S/N 878-160) can be installed in Unit 4, which is expected to be no later than
26 October 31, 2024.

27 8. The ability for the Facility to use the Carlsbad supercore must be determined on or
28 before August 1, 2024, which is the deadline for filing the Facility’s Resource Adequacy (RA)

1 plan with the California Independent System Operator (CAISO) for the summer peak season. If
2 Unit 4 remains in outage with no ability to operate, the facility must reflect that in its RA plan,
3 which could expose the Facility to contract losses of between \$2 million and \$5 million.
4 Moreover, because peaker generation at the Facility is among the lowest emitting in the state, and
5 CAISO incentivizes the use of these units over higher emitting generation for grid reliability,
6 these potential losses are likely to be realized due to lost dispatching by CAISO.

7 9. The Facility is licensed with the California Energy Commission (CEC), an agency with
8 whom I have been in communication since the initial outage of Unit 4 and have provided them
9 with updates regarding the intended use of the Carlsbad supercore. I have been informed by the
10 CEC that its compliance staff supports the variance pursuant to Case 6230-3 and views this this
11 type of activity as a "like-kind replacement" that does not require CEC approval, since there
12 would be no changes to any emissions or to the Conditions of Certification in WCE's license.

13 10. I have been informed by the CEC, as the lead agency for ensuring safe and reliable
14 electric system throughout California, that the availability of peaking generation such as Unit 4 is
15 of utmost concern to the commission during the summer season when electrical grid demand
16 peaks. CEC seeks weekly status, at a minimum, regarding the availability of Unit 4 to support
17 electrical demand.

18 11. Use of the functionally equivalent supercore would not increase emissions or change
19 its performance or electrical generating capacity, and replacement of supercore S/N 878-149 with
20 supercore S/N 878-187 is considered a like-kind replacement with no CEC approval required.

21 12. Unit 4 operates a certified continuous emission monitoring system (CEMS) to measure
22 oxides of nitrogen (NOx) and carbon monoxide (CO) emission at the exhaust stack. The CEMS
23 will be fully functioning throughout the variance period.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed this day of July 30, 2024, City of Industry, California.

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GEORGE PIANTKA