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## HBGS Response to Public Safety Power Shutdown Events

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Mon, Jul 1, 2019 at 3:51 PM

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Hi Al and Jason.

We really want to thank you for taking the time to meet with Chuck, Chris, and myself on preventative measures for resuming power generation at HBGS during safety power shutdown events. This message serves to summarize some of the topics of discussion during the meeting.

As you're aware - due to the increasing risk of wildfire events, PG&E will likely be shutting off power to high fire risk areas when conditions warrant. Even though Eureka and other nearby towns are not in high risk areas, the transmission lines feeding the area traverse through high risk territory, leading to potential power shutdowns when conditions warrant. Although the likelihood of a power shutdown affecting the Eureka area is minimal, these events carry a high impact potential.

When safety power shutdowns occur, HBGS would like to continue to provide power to the local community by generating power without being able to receive power from the state-wide grid. The current Title V Permit conditions will not allow us to accomplish power restoration during these events without being at risk of non-compliance with the permit.

While operating isolated from the rest of the grid or system, it is expected that one or more engines will be producing a base load and that there will be at least one engine that will be ramping up or down to absorb the fluctuating demand. HBGS is concerned that this engine(s) most likely will end up dipping/spiking below 8 MW to react to this fluctuation. Is the 50% limit stated in Condition #111 a hourly average or a single instantaneous limit? There is also a small risk that during power restoration efforts, a sustained drop or spike in demand could cause a situation where engines will need to be run under 12.0 MW for more than 80 engine hours in a calendar day.

During a safety power shutdown, the ability of HBGS to continue to provide power locally will require the use of the diesel powered Emergency Generator to enable the startup permissives (prelube pressure, HT water temp, LFO temp, valve power supply, fuel feeder pump, etc.) that are

critical functions needed to get the engines back online. PG&E is requesting that the Emergency Generator be allowed for use in order to start the engines during a safety power shutdown.

Because a repower effort during isolation from the grid has not been tested at HBGS, it is currently unknown what other issues might arise during an actual event. It would be prudent for this effort to be tested prior to an event to ensure a seamless repowering event.

Accordingly HBGS respectfully requests that the District assess Title V Permit Conditions #106, 110, 111, 112, and 113 to identify any revisions that can be made in order to allow HBGS to repower the area when isolated from the grid as HBGS will not attempt to restore power locally without being confident that all permit conditions can be met in doing so. In addition, HBGS requests the ability to conduct a repowering testing effort to allow HBGS to uncover and address any hidden issues prior to a safety power shutdown event. We look forward to hearing back from you. Please let us know if you have any questions or concerns.

Thanks,

*Ryan Messinger*

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