



November 18, 2019

## **Compliance Advisory Public Safety Power Shutoff Events**

The intent of this advisory is to provide clarification regarding air pollution control regulations applicable to combustion engines used during Public Safety Power Shutoff (PSPS) events.

The PSPS is a preventative measure that the utility companies can utilize to turn off electricity if they believe that there is an imminent and significant risk that strong winds and dry conditions, combined with a heightened fire risk, are forecasted.

Many residents and businesses have expressed concerns about being without power for extended periods of time during a PSPS event and have had questions regarding the installation and usage of electrical generators powered by internal combustion engines (gensets). Except for private residences as discussed below, if the engine powering the generator is rated at 50 horsepower or greater, a permit or registration is required prior to installation.

PSPS events are considered unforeseen interruptions of electrical power from the utility. Therefore, after a specific potential PSPS event has been announced for a location the following options are available:

1. A portable genset, with a valid registration from the California Air Resources Board (CARB) or the San Diego Air Pollution Control District (District), can be brought onsite and used during any associated power shutoff. Any such registered portable genset must be removed from the facility as soon as possible after the PSPS event (or potential PSPS event) has been cancelled or power has been restored; or,
2. Facilities with a valid stationary emergency engine permit from the District can operate the engine during the PSPS event as long as the operation complies with all permit conditions; or,
3. In the event a registered portable genset cannot be procured, CARB has provided guidance that PSPS events might qualify as Emergency Events, and therefore the use of unregistered portable engines might be allowed for the duration of a PSPS event – but only if necessary to alleviate a threat to public health and safety. An unregistered portable genset might be operated during an Emergency Event only if the following conditions are met:
  - a. The engine to be used is certified to meet a California or federal emission control standard;
  - b. The owner or operator demonstrates that there is an immediate temporary need to operate the engine to help alleviate a threat to public health and safety that is

- the result of a reasonably unforeseen event, that is beyond the control of the owner or operator;
- c. The owner or operator notifies CARB within 24 hours of commencing operation by submitting a Form 40 (Notification of Operation in an Emergency Event); and
  - d. The engine is operated only for the duration of the Emergency Event.

In response to receiving a Form 40 submittal, CARB, in consultation with the local air district, may refute that an Emergency Event exists, in which case operation of the engine must cease immediately.

If a business or resident wants to have a backup generator (rated at 50 horsepower or greater) on site to address the potential for future power outages, including future PPS events that have not yet been announced, a permit application must be submitted to the District and an Authority to Construct must be received prior to installing the genset, information on required application forms and fees can be found here:

<https://tinyurl.com/y44ga4kn>. Equipment used exclusively in support of any structure designed for and used exclusively as a dwelling for not more than four families is exempt from permitting requirements.

For more information on PPS please visit <https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff>. If you have any questions regarding this advisory or need additional compliance assistance, please contact the Compliance duty supervisor at (858) 586-2650.