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*Fire Protection Products, Inc.*

December 11<sup>th</sup>, 2006

Attention: Kris Kjellman  
Edison Mission Energy

Regarding: The use of engine exhaust After-treatment Devices on Certified Fire Pump Drivers

Clarke Fire Protection Products has been building Underwriters Laboratories (UL) and Factory Mutual (FM) Certified Fire Pump Drivers for stand-by, emergency fire protection for sprinkler systems for over 26 years. Fire Pump drivers are built in accordance with the NFPA 20 Standard and certified to the rigorous performance standards of UL and FM. Our engines meet the strict requirements that one would expect for equipment dedicated to life-safety and property protection. The engine proposed for purchase by Edison Mission Energy for the Sun Valley and Walnut projects will be built in accordance with the NFPA 20 Standard and will meet the performance standards of UL and FM.

The fire protection market Clarke serves is all about life-safety and property protection, and therefore every component in a sprinkler system needs to be as simple and reliable as possible. Most causes of stand-by, emergency equipment not functioning in a real fire situation is due to the lack of maintenance of the components that comprise the system. Failure of just one component in the system can cause the entire fire protection system to fail. After-treatment Devices, if not properly maintained, are additional items in the system that can cause a diesel fire pump driver to not perform in a real fire situation.

NFPA 25 is the standard that addresses the required maintenance on all fire protection components in the fire protection system. NFPA 25 has not even attempted to draft maintenance timelines and procedures on After-treatment Devices. Therefore, anyone installing such equipment on dedicated fire protection equipment would take on the liability of selecting, installing and maintaining this equipment such that it functions properly during a real fire situation. They would do this without any maintenance requirements established in NFPA 25. Failure of such equipment during a real fire situation that would cause the engine to not perform could result in significant loss of life and property damage.

The most important item to remember is that fire pump drivers are for emergency stand-by service. They have evolved into specially built and very reliable components that protect life-safety and property. To sacrifice this reliability for unproven After-treatment Devices that could render the driver less reliable in a real fire situation could be very risky.

Regards,

*Ken Wauligman*  
Ken Wauligman, PE  
Engineering Manager

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