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Reject the Magnolia Power Plant Expansion

Additional submitted attachment is included below.



November 10, 2025

To: California Energy Commission
715 P Street
Sacramento, CA 95814

David Hochschild, Chair
Siva Gunda, Vice Chair
Noemí Gallardo, Commissioner
J. Andrew McAllister, Commissioner
Nancy Skinner, Commissioner

RE: Magnolia Power Project (MPP) Petition to Amend (01-AFC-06C)

Dear Chair Hochschild, Vice Chair Gunda, and Commissioners Gallardo, McAllister, and Skinner:

Thank you for the opportunity to comment on the Magnolia Power Project Petition to Amend (01-AFC-06C). I am writing today on behalf of the Sierra Club and our approximately 500,000 members statewide. We have deep concerns about the proposed petition to amend the Magnolia Power Plant. This proposal directly contradicts the state's clean energy goals via SB 100 and the state mandate to substantially reduce reliance on gas plants, via SB 887. Increasing gas capacity and emissions limits is the last thing this Commission should be doing. We strongly urge the commission to reject this petition to amend and protect the health and air quality of Burbank residents.

This project would allow for increased air pollution in one of the country's most polluted air basins.¹ The South Coast Air Basin is in extreme nonattainment for ozone.² Furthermore, the proposed petition seeks to:

- "Increase oxides of nitrogen (NOx) emissions limits during startups and shutdowns and revise recommissioning hours, fuel use, and NOx emissions limits...
- Increase allowable CO [carbon monoxide] emissions limits during startups and shutdowns and revise recommissioning hours, fuel use, and CO emissions limits...

¹ *About South Coast AQMD*, South Coast Air Quality Mgmt. Dist., <https://www.aqmd.gov/nav/about> (last visited Nov. 10, 2025).

² South Coast Air Quality Mgmt. Dist., *2022 Air Quality Management Plan* (Dec. 2, 2022), <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>.

- ...Remove recommissioning hours and fuel use limits and to exempt VOC emissions limits during startup and shutdown periods.”³

All of the proposed increased pollution limits will contribute to exacerbating ozone pollution in the South Coast Air Basin. Increasing pollution from power plants should be something this Commission stands firmly against. Approving this petition would mean knowingly increasing pollution in one of the most polluted parts of the country, while increasing the state’s reliance on fossil fuels.

Additionally, this project is using taxpayer dollars to expand fossil fuels infrastructure. If approved, this project would get \$23.3 million dollars in the form of a Distributed Electricity Backup Assets (DEBA) grant from the state’s Strategic Reliability Reserve (SRR).⁴ This reserve is funded by taxpayers. If approved, this would mean locking millions of dollars into a power plant that will need to retire in less than 20 years, in order to meet the state’s clean energy goals. This is a clear waste of investment and taxpayer dollars. This money would be better utilized through investments into clean energy resources, including energy storage and distributed energy resources like rooftop solar and batteries, which could help decrease the need for gas generation.

Finally, this is an environmental justice issue. The Magnolia Power Plant is located in Burbank, in one of the most polluted communities in California. The community is in the 98th percentile for pollution burden. According to CalEnviroScreen, this community already experiences high ozone and particulate matter pollution. Increasing allowable NOx, CO, and VOC pollution will increase pollution levels and will directly impact the health of this community and exacerbate environmental injustice.

We urge the CEC not to approve this project, as it is going against the state’s climate goals, exacerbating poor air quality, furthering environmental injustice and investing taxpayer dollars directly into expanding our reliance on fossil fuels. Please protect California’s clean energy future and reject this proposed project.

Sincerely,

Julia Dowell
Senior Campaign Organizer
Sierra Club

³ California Energy Commission, PROPOSED ORDER ON PETITION TO AMEND (Dec. 23, 2024), page 2, *available at* <https://www.energy.ca.gov/filebrowser/download/8775?fid=8775>.

⁴ Southern California Public Power Authority, SCPPA Coordinating Committee Memo_MKS (Oct. 02 2025), *available at* http://members.scppa.org/WebLink/0/edoc/297355/SCPPA%20Coordinating%20Committee%20Memo_MKS%20100225.pdf.