

<b>DOCKETED</b>	
<b>Docket Number:</b>	01-AFC-06C
<b>Project Title:</b>	Magnolia Power Project-Compliance
<b>TN #:</b>	267544
<b>Document Title:</b>	BWP Comment Letter DEBA Grant DBA-25-003 and DBA-25-004
<b>Description:</b>	BWP Comment Letter -Support Distributed Electricity Backup Assets (DEBA) Grant DBA-25-003 and DBA-25-004
<b>Filer:</b>	Claudia
<b>Organization:</b>	City of Burbank, Burbank Water and Power
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	11/14/2025 7:05:40 PM
<b>Docketed Date:</b>	11/14/2025



## **WATER AND POWER**

November 14, 2025

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: Support Distributed Electricity Backup Assets (DEBA) Grant DBA-25-003 and DBA-25-004**

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

Burbank Water and Power (BWP) strongly urges you to support the two grant agreements with the City of Burbank, DBA-25-003 and DBA-25-004, for the Distributed Electricity Backup Assets (DEBA) program. These grants are essential to maintaining grid reliability as utilities across the state continue to integrate additional renewable resources.

BWP is a publicly owned utility in the City of Burbank. Our council has set ambitious climate goals, including procuring 100% of its power from zero-carbon resources by 2040. We are advancing innovative projects like our 75 kW Iron Flow battery (partially funded by the American Public Power Association) that is installed and connected to a 265 kW solar array on our EcoCampus. We are also close to energizing a 2.4 megawatt (MW) solar/battery project at the Hollywood Burbank Airport.

The Magnolia Power Project (MPP) is a high-efficiency, natural gas-fired, combined cycle plant owned by the Southern California Public Power Authority and operated by BWP. Critically, the plant provides reliable, baseload power for six participants: Anaheim, Burbank, Glendale, Pasadena, Colton, and Cerritos.

The urgency for this project came from the reliability issues identified during the 2022 heat dome. During that event, generating assets across the state were asked to run, regardless of their environmental impact. BWP worked closely with the Governor's office and the California Electric Commission (CEC) to strategize how to better utilize the MPP to ensure state electric reliability.

Out of these discussions, BWP evaluated the option of upgrading MPP for several reasons. First, it provides an in-basin dispatchable generation unit. Second, upgrading MPP is a more cost-effective alternative to constructing a new facility. Third, an upgraded MPP would operate more cleanly and with fewer environmental impacts than a peaker plant. Concurrently, the CEC developed the Distributed Electricity Backup Assets (DEBA), a grant opportunity released in 2023 that focused on two issues: 1) To provide efficiency upgrades to existing plants, and 2) Add capacity to existing power generators in California that will serve as an emergency supply for the state's electrical grid during extreme events.



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The CEC issued notice of proposed award, including MPP for two DEBA grants, on April 24, 2024. Over the next year, BWP worked closely with CEC staff and outside vendors to craft a project that balanced reliability and environmental concerns. This project is about supporting more renewable resources, like wind, solar, and storage. As utilities add more renewable resources, it is vital to have in-basin baseload generation available.

The project was intentionally designed to maintain the existing permitted generating capacity of 323 MW. It achieves this by enhancing summer performance while keeping the plant's maximum operating capacity capped at current levels.

This project followed a rigorous public process. The grant was approved at public hearings at the Burbank City Council and the Southern California Public Power Authority (SCPPA). Additionally, both the South Coast Air Quality Management District (SCAQMD) and the United States Environmental Protection Agency (US EPA) followed their public notice requirements and public comment periods.

Both the SCAQMD and the US EPA approved the permit to construct, thus demonstrating compliance with applicable laws, ordinances, regulations, and standards. CEC staff found that the proposed upgrades comply with CEC siting regulations and would not result in significant or disproportionate impacts on minority or low-income populations, and no environmental justice issues were identified.

Over the years, BWP has made significant upgrades to the MPP to ensure it operates with the most advanced technologies while minimizing community impacts. MPP incorporates several state-of-the-art environmental features that are uncommon for a facility of its size. BWP installed an innovative Reclaimed Water Treatment System that uses 100% recycled water and achieves zero liquid discharge. The plant also recently added a stormwater capture and reuse system that will save more than eight million gallons of water each year. In addition, MPP utilizes advanced pollution-control equipment to further reduce air emissions and enhance overall environmental performance.

As California progresses toward a zero-carbon future, maintaining resources like MPP remains essential to managing the transition to cleaner energy technologies. This project plays a critical role in supporting regional and statewide reliability, especially during periods of heightened grid stress.

We would like to thank the CEC staff who supported BWP throughout the grant process. We respectfully urge your support for this project to help ensure reliability, affordability, and sustainability across the state.

Sincerely,

Mandip Samra  
General Manager, Burbank Water and Power