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Planetary Boundaries

Deny the Petition to Amend.

The petition to amend appears to comply with all laws, ordinances, regulations and standards levied by the authorities having jurisdiction. My opposition to the Magnolia Power Plant upgrade is grounded in science.

We live on a finite planet. Planetary boundaries have been identified which define a safe operating space for humanity <https://www.science.org/doi/10.1126/sciadv.adh2458> In total, nine boundaries representing significant components of the Earth system are critically affected by human activities. Six are transgressed already — climate change is just one of the six. This alarming situation must be recognized by all decision-makers and appropriate actions taken.

California has laws mandating the clean energy transition and a reduction in greenhouse gas (GHG) emissions. And while the MPP upgrade narrowly follows the legal mandate, it violates the spirit of those laws (GHG emissions will increase by 1.5% under the proposed amendment). Moreover it should be recognized that powers beyond California exist (e.g. the current federal government) that seek to degrade California's climate and environmental laws. Therefore California should push even harder in the climate-space in anticipation of those reactionary forces. It's for those reasons that the MPP upgrade should be viewed as unacceptable.

It comes down to judgement. California regulators need to exercise best-judgment and not grant approval merely because all (near sighted) LORS comply. Every decision in the State of California (indeed, the world) from now on has to be made in light of the climate crisis and planetary boundaries. MPP operations will increase GHGs, a backwards step. Battery energy storage systems (BESS) are an affordable, highly dispatchable alternative which can help lower electricity rates. Good judgement acknowledges that BESS represent better investments than gas-fired power plants. Consider upgrading MPP with BESS instead.

I urge you to deny the petition to amend.