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*Comment Received From: Sanford Krasner*

*Submitted On: 11/17/2025*

*Docket Number: 01-AFC-06C*

## **What is the rationale for the Magnolia Expansion**

Vote NO on the Magnolia expansion

What is the rationale for expanding the capacity of Magnolia? Is there a critical shortage of capacity? Is this necessary to avoid blackouts? The only rationale given in the Necessity of Proposed Changes is, to paraphrase, “we didn’t have this stuff when the plant was built”.

The proposed change increases the Magnolia capacity by about 20%. Is there an impending crisis that will be solved by this increase?

The staff assessment says that this upgrade will increase by about 1.5% the CO2 emitted per year. Given the ongoing climate crisis, we should be reducing GHG emissions, not increasing them. I can see that this amount technically falls below the AQMD’s significant impact threshold. But in this climate crisis, how can the staff assess that there is no significant environmental effect?

The report says that this upgrade has no significant environmental impact, and then outlines 12 emissions requirements changes that will need to be made. This is equivalent to shooting an arrow at a barn and painting the target around the arrow “We meet the requirements once they have been loosened.”

What is the schedule for implementing this upgrade? I could find no mention of a schedule in the supporting material.

Why are we investing \$72 million in what will soon become a stranded asset? Why should we spend \$72 million so that we can spend an increasing amount for natural gas when renewable energy is much cheaper. The US Energy Information Administration expects the cost of natural gas to industrial users to increase by 21% in 2025, with continuing rises in out-years.

For the same \$72 million, we could install a 40 MW (160 MWh) battery electric storage system. This has much quicker response time, and will allow rate arbitrage “storing excess energy at midday when it is nearly free, and returning it during evening peaks.

What is the overwhelming advantage to the people of California that would justify these additional emissions?

Vote NO on the Magnolia Gas Plant Expansion.

*Additional submitted attachment is included below.*

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