

**Krause, Erik**

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**From:** Sarah Finley <sarahfinley@gmail.com>  
**Sent:** Monday, November 20, 2017 12:08 AM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1100-1

I have a 2 year old daughter and am pregnant with my second child. My daughter already suffers from environmental respiratory issues. I am highly concerned that the emissions from the Grayson plant will further harm my children's health. 1100-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1100-3

Regards,

Sarah Finley, Los Angeles

Sent from my iPhone

**Krause, Erik**

**From:** Satenique Squires <satenique@gmail.com>  
**Sent:** Monday, November 20, 2017 4:20 PM  
**To:** Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Stop the Grayson Power Plant !

Dear Mr. Krause, I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. It is my understanding that this expansion will emit **7 times more emissions** than it currently produces -- raising toxic air particulate levels **542% and greenhouse emissions 686%** -- to generate 3x Glendale's current need for energy in order to make it an energy seller outside of Glendale.

Needless to say this expansion poses a serious health hazard to thousands of **Glendalians** living, working, going to school, and playing in the parks that are within 3-miles area from the power plant.

It is morally and ethically wrong to risk the health, well-being and pursuit of happiness of people living in Glendale in order to sell energy to people residing outside of Glendale.

I am sure I don't need to remind you that the power plant is near Edison Elementary, Pacific Park and Community Center, and Pelanconi Park.

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

Sincerely,  
Satenique Squires  
514 W. Harvard Street  
Glendale, 91204  
(818) 414-7929

**Krause, Erik**

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**From:** Shannon Clark <sclark@gusd.net>  
**Sent:** Monday, November 20, 2017 4:21 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1102-1

I am a mother of two young daughters, and a teacher of dozens of high school students every year. My husband and I just bought a house in Glendale and both of us teach in the public schools here. We plan on staying for a very long time, and it is our sincere hope that Glendale becomes a leader in environmental issues. 1102-2

All I am asking is for the city to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. Have you, for example, investigated rooftop solar on government building (or by subsidizing homeowners for putting solar onto their homes)? 1102-3

Regards,

Shannon Clark-Reed  
Glendale, CA

**Krause, Erik**

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**From:** sageymom@aol.com  
**Sent:** Monday, November 20, 2017 4:13 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1103-1

Going north we are the first home in the path of the potential increase in pollutants. 1103-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1103-3

Peace,

Sherry St. Pierre  
1300 Truitt St 91201

**Krause, Erik**

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**From:** Earthjustice <action@earthjustice.org> on behalf of Sommer Yesenofski <info@earthjustice.org>  
**Sent:** Monday, November 20, 2017 10:09 AM  
**To:** Krause, Erik  
**Subject:** Please reject plans to rebuild the Grayson natural gas power plant

Nov 20, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Renewable energy NOW!

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives.

1104-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around.

1104-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.

1104-3

The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need.

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future.

1104-4

Sincerely,

Sommer Yesenofski

Los Angeles, CA 90027

[yesenofs@usc.edu](mailto:yesenofs@usc.edu)

**Krause, Erik**

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**From:** sophie hamel <hamel.sophie@gmail.com>  
**Sent:** Monday, November 20, 2017 4:43 PM  
**To:** Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Opposition to the Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

1105-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

1105-2

Regards,

Sophie Hamel, Los Angeles

**Krause, Erik**

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**From:** Stella Grigoryan <grigoryan.stella@gmail.com>  
**Sent:** Monday, November 20, 2017 10:47 AM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1106-1

[Personalized text] – feel free to draw on your experience or any of the points in the talking points

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1106-2

Regards,

[Stella Grigoryan] [Glendale]

**From:** Steven Nancarrow <[srnancarrow@gmail.com](mailto:srnancarrow@gmail.com)>

**Date:** November 20, 2017 at 10:24:12 PM MST

**To:** [VGharpetian@glendaleca.gov](mailto:VGharpetian@glendaleca.gov), [zsinanyan@glendaleca.gov](mailto:zsinanyan@glendaleca.gov),  
[pdevine@glendaleca.gov](mailto:pdevine@glendaleca.gov), [anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov), [vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov),  
[EKrause@glendaleca.gov](mailto:EKrause@glendaleca.gov)

**Subject: Walk Bike Glendale Comment Letter to Grayson Repowering**

Dear Glendale City Council,

Walk Bike Glendale strongly opposes the Grayson Repowering Project. Walk Bike Glendale does not recommend this proposed project, as it may decrease access to Glendale’s section of the LA River and the Verdugo Arroyo and impact pollution levels in the surrounding communities.

Here are a few of the reasons we do not support the Grayson Repowering Project:

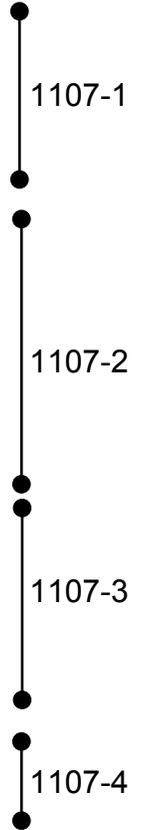
- WBG believe that not enough research has been performed on the impact the Grayson Repowering Project may have on the Verdugo wash and the adjacent river communities. The increased levels of pollution are of significant concern for the

sensitive wildlife areas.

- This extension would involve a significant stretch immediately adjacent to the Verdugo Wash and LA River. Access points along the river would be close to the plant. The project layout should be done so that it at its perimeters it does not impede proposed recreational uses and facilitates future access to the trail and planned wetlands.

We request that alternatives be developed to address all the concerns above and would be pleased to meet to discuss our comments.

Steven Nancarrow, Chair  
Walk Bike Glendale  
[walkbikeglendale@gmail.com](mailto:walkbikeglendale@gmail.com)



Making Glendale a City where  
Everyone Feels Safe to Walk and Bike

Dear Glendale City Council,

Walk Bike Glendale strongly opposes the Grayson Repowering Project. Walk Bike Glendale does not recommend this proposed project, as it may decrease access to Glendale's section of the LA River and the Verdugo Arroyo and impact pollution levels in the surrounding communities.

1107-1

Walk Bike Glendale (WBG), a local chapter of the Los Angeles County Bicycle Coalition, was formed shortly after adoption of the Safe and Healthy Streets Plan in 2011, the City's first policy document focused on walking and bicycling. We advocate for vibrant and safer places to walk and bike, promote walking and bicycling as fun and sustainable alternatives to driving, educate to increase safety on our streets, and inspire the community to get involved and make a difference. Here are a few of the reasons we do not support the Grayson Repowering Project:

1107-2

- WBG believe that not enough research has been performed on the impact the Grayson Repowering Project may have on the Verdugo wash and the adjacent river communities. The increased levels of pollution are of significant concern for the sensitive wildlife areas.
- This extension would involve a significant stretch immediately adjacent to the Verdugo Wash and LA River. Access points along the river would be close to the plant. The project layout should be done so that it at its perimeters it does not impede proposed recreational uses and facilitates future access to the trail and planned wetlands.

1107-3

We request that alternatives be developed to address all the concerns above and would be pleased to meet to discuss our comments.

1107-4



Steven Nancarrow, Chair  
Walk Bike Glendale  
[walkbikeglendale@gmail.com](mailto:walkbikeglendale@gmail.com)





Making Glendale a City where  
Everyone Feels Safe to Walk and Bike

[www.walkbikeglendale.org](http://www.walkbikeglendale.org)



**WALK BIKE**   
**GLENDALE**



**Krause, Erik**

**From:** susan dembowski <susandembowski@gmail.com>  
**Sent:** Monday, November 20, 2017 5:01 PM  
**To:** Krause, Erik  
**Subject:** Grayson Repowering Project: Please commission an independent study of clean renewable energy alternatives

Dear Mr.Krause,  
Please commission an independent study of clean renewable energy alternatives for the Grayson Repowering Project's plant rebuilding and expansion needs.

1108-1

Natural gas plants are dangerous to human health and the environment of the entire region. We witnessed the terrible **Aliso Canyon** accident's adverse health effects on residents. Also, this unprecedented release of vast amounts of methane gas into the atmosphere greatly contributed to global warming, affecting all of us.

1108-2

Our region doesn't need such an overproduction of power generation. California recognizes its future is in clean energy and increasingly rules that higher percentages of our electricity be from renewables. In 2018 Sacramento will return to SB100, in one form or another, accelerating the requirement of 100% clean renewable energy by 2045. Improved technologies in battery storage, etc. are rapidly evolving to store and provide clean power when the sun isn't shining and wind isn't blowing. Sooner or later, the excess production of dirty gas plants will become a financial liability for our cities.

1108-3

**Oxnard's** plan to replace the Puente natural gas power plant is on hold; L.A. is studying clean-energy alternatives which could replace natural gas plants that **LADWP** was planning on building. Please commission an independent study to consider clean renewable energy alternatives for **Glendale**—for its residents and its neighbors.

1108-4

Thank you.

Susan Dembowski

**Krause, Erik**

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**From:** Susan Goldberg <sgoldb5785@aol.com>  
**Sent:** Monday, November 20, 2017 5:56 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1109-1

[Personalized text] – feel free to draw on your experience or any of the points in the talking points

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1109-2

Regards,

Susan Goldberg  
Glendale CA.

**Krause, Erik**

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**From:** Suzanne Wright <suzannenwright@gmail.com>  
**Sent:** Monday, November 20, 2017 4:59 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

1110-1

As a Resident of Glendale, I am truly disappointed that our city who has 'pledged' to be more green is resorting to old technology solutions to re-power Grayson. California is trying to lead the way in the country and in the world in using cleaner energy and committing to lowering our impact in Climate Change.

1110-2

Lets act like Californians here in Glendale, and lets use this opportunity to be an example for other cities in the state to show how it is possible to do our part to clean our air with the implementation of renewable energy technology right here in our own city.

1110-3

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

1110-4

sincerely,

Suzanne, 91201 Glendale

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**Suzanne N. Wright**

**Krause, Erik**

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**From:** Tanya Wilson <scootergrrl@pacbell.net>  
**Sent:** Monday, November 20, 2017 9:30 AM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1111-1

I drive an EV so I am especially concerned, passionate and savvy about clean energy. If Glendale treats energy like it did the water shortage we're in trouble. 1111-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. Would this be the time to audit tax return and bank accounts of people involved in highly profitable but pointless city investments? 1111-3  
1111-4

Regards,  
Tanya Wilson  
Glendale, 91202-1235

**Krause, Erik**

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**From:** Taryn Johnson <taryn.johnson@me.com>  
**Sent:** Monday, November 20, 2017 12:39 PM  
**To:** Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** OPPOSITION TO GRAYSON REPOWERING

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1112-1

As an employee in the immediately surrounding area of the plant with young children in a childcare facility less than a mile from the plant, I am deeply concerned about the implications to our health. 1112-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1112-3

Regards,

Taryn Johnson  
Glendale, CA

**Krause, Erik**

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**From:** Terri Murray <terri.l.murray@gmail.com>  
**Sent:** Monday, November 20, 2017 11:22 AM  
**To:** Krause, Erik  
**Subject:** vgharpetian@glendaleca.gov; pdevine@glendaleca.gov; vagajanian@glendaleca.gov; zsinanyan@glendaleca.gov; anajarian@glendaleca.gov

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

1113-1

For the past two years, the air in LA has gotten worse instead of better - the direction Glendale is taking will only make things worse.

1113-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

1113-3

Regards,

Terri Murray

**Krause, Erik**

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**From:** Thomas Grummt <tommigrummt@gmail.com>  
**Sent:** Monday, November 20, 2017 3:52 PM  
**To:** Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** power plant expansion

Dear Mr. Krause and Glendale City Council,

I am a resident of Glendale, and I am working at DreamWorks Animation on Flower Street. I have a 3 year old son who will hopefully go to a school nearby. I'm frankly very concerned to hear about plans for expanding energy production based on fossil fuels, rather than investing in clean energy that could improve the quality of life and health of our children, rather than endanger them. These are very important considerations for me when I think about staying in Glendale long term, or purchasing property.

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

Best regards,

Thomas Grummt, Glendale

1114-1

1114-2

1114-3

**Krause, Erik**

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**From:** Tiffany Henschel <tiffanyhenschel@mac.com>  
**Sent:** Monday, November 20, 2017 1:56 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Re: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1115-1

This so-called "re-powering" will increase emissions, undoubtedly causing adverse health effects and pollution in surrounding areas. In addition, it's an expansion and increase energy that we don't need. With clean power and renewable sources increasing each year, this is not the way to go. It's excessive and harmful to the city and its inhabitants. 1115-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1115-3

Regards,

Tiffany Henschel  
Glendale, Calif. resident

**Krause, Erik**

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**From:** Topher Hughes <hugestopher86@gmail.com>  
**Sent:** Monday, November 20, 2017 1:31 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1116-1

I live in Burbank and work in Glendale close to the power plant and I do not want more pollution. It's 2017, we should be working towards clean energy not building new fossil fuel power plants. This project is a step backwards from trying to move to 100% clean energy. 1116-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1116-3

Regards,  
Topher

**Krause, Erik**

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**From:** Trevor Jones <trevorjones77@gmail.com>  
**Sent:** Monday, November 20, 2017 2:05 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Opposition to Expansion of Grayson

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1117-1

My children go to school at **Glendale Montessori** and the repowering project will certainly affect their health and my interest in continuing to send them to school in Glendale. I also rent a private office at the **Hollywood Production Center on Brand**. We rent an apartment in Los Feliz but my wife and I and I have started a **home search in Glendale** because we love the area so much. If this expansion goes through we will most certainly look to move elsewhere. 1117-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1117-3

Regards,

Trevor Jones - Los Feliz/Glendale

**Krause, Erik**

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**From:** Ute Zapata <utezapata@me.com>  
**Sent:** Monday, November 20, 2017 3:14 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

Regards,

Ute Zapata, Los Angeles

Sent from my iPhone

1118-1  
1118-2

**Krause, Erik**

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**From:** Vera Santamaria <vera.santamaria@gmail.com>  
**Sent:** Monday, November 20, 2017 12:50 PM  
**To:** Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson Repowering Project

To Whom It May Concern:

As your neighbor, I am writing to express my very strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1119-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1119-2

Regards,

Vera Santamaria, Glendale

**Krause, Erik**

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**From:** veronica ortiz-vargas <vortizvargas@gmail.com>  
**Sent:** Monday, November 20, 2017 9:39 AM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 1120-1

This is a terrible choice for the city of Glendale. A lot of your residents will move out of the area and make the people 1120-2  
that are forced to stay here l'll. Think about the future generation and how much this will affect everyone.

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy 1120-3  
alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean  
energy credentials and not by the consultants who have been working on the Grayson EIR.

Regards,

-Veronica Vargas  
Glendale

-Veronica Vargas  
veronicavargashmu.com

**Krause, Erik**

**From:** Victor Archuleta (vearchuleta@yahoo.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Monday, November 20, 2017 7:39 AM  
**To:** Krause, Erik  
**Subject:** Grayson Power Plant: Go Away

Dear Mr. Erik Krause,

Please be fair to the residents of Glendale... Thank you.

As a resident of Glendale and a GWP customer, I'm writing to voice my strong opposition to rebuilding and expanding the Grayson Power Plant. Rather than sinking \$500 million into a polluting fossil fuel facility, I urge you to seize the opportunity to make Glendale a showcase for clean energy alternatives. The list of concerns with this project is long.

? Emissions of carbon monoxide, nitrogen dioxide, sulfur dioxide, small particulate matter and other pollutants will increase across the board. This will worsen already bad air quality in an area that houses two elementary schools (Mark Keppel and Franklin), the Disney Creative Campus and Disney Children's Center, the residential neighborhoods of Pelanconi Estates and Moorpark, and popular outdoor spaces such as the John Ferraro Athletic Fields and Glendale Narrows Riverwalk.

? Greenhouse gas emissions, which are heating up our region and increasing risks of drought and fire, will increase by more than 415,000 tons of carbon dioxide each year. That's an increase of six times over the current levels, and equivalent to adding 90,000 cars to Glendale's roads!

? The plant would be built in an identified liquefaction zone. That makes the plant itself, and the gas piping and transmission systems, all highly vulnerable to a serious earthquake. Apart from the obvious safety risks, this raises questions about its ability to maintain reliable service in an emergency.

? Spending \$500 million on a single, large fossil fuel plant creates huge financial risks for Glendale ratepayers. With efforts underway in Sacramento to move the state to 100% clean energy by 2045, it's more likely than not that we'll be paying for this plant long after it's been forced to shut down.

Glendale doesn't even need this much power. Your own reports forecast falling demand for electricity in Glendale. If demand is falling, why would we need to build a plant that increases generating capacity by 33% as this proposal does?

This project would lock us into legacy technology that harms public health just at a time when the rest of the state is surging forward. I urge you to halt efforts to expand Grayson and commission a study of clean energy alternatives.

Sincerely,

Victor Archuleta  
 1145 Alameda Ave.  
 Glendale, CA 91201  
[vearchuleta@yahoo.com](mailto:vearchuleta@yahoo.com)  
 (310) 251-7623

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

1121-1

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1121-4

1121-5

1121-6

1121-7

**Krause, Erik**

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**From:** Viktoria Herberts <viktoriahberts@gmail.com>  
**Sent:** Monday, November 20, 2017 5:03 PM  
**To:** Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson Power Plant: I oppose the rebuilding and expansion!

Dear Mr. Krause and Glendale City Council,

I am a resident of Glendale, and I have a 3 year old son who will hopefully go to a school nearby. We love this community and really want to stay here and raise our kids here. I'm frankly very concerned to hear about plans for expanding energy production based on fossil fuels, rather than investing in clean energy that could improve the quality of life and health of our children, rather than endanger them. These are very important considerations for me and my family when we think about staying in Glendale long term, and purchasing property.

1122-1

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

1122-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

1122-3

Best regards,

Viktoria Herberts,  
resident of Glendale

**Krause, Erik**

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**From:** Virginia <vpardo911@aol.com>  
**Sent:** Monday, November 20, 2017 1:40 PM  
**To:** Krause, Erik  
**Subject:** Grayson power plant

I am a Glendale resident. I am against expanding the power plant.

Best regards,  
Virginia Pardo

Sent from my iPhone

1123-1

**Krause, Erik**

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**From:** Wayne Watanuki <wwatanuki@live.com>  
**Sent:** Monday, November 20, 2017 4:50 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Re: Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1124-1

With the recent surge in renewable energy sources and the state's pledge to the Paris Climate Accord, why would the city choose to expand its greenhouse-gas producing energy plant at such a high cost? Wouldn't that money be better served to update the current technology for cleaner energy production and a safer and cleaner environment? 1124-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1124-3

Regards,

Wayne Watanuki

Glendale, CA

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**Krause, Erik**

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**From:** BC <bcnc2001@pacbell.net>  
**Sent:** Monday, November 20, 2017 5:29 AM  
**To:** Krause, Erik  
**Cc:** gharpetian@glendaleca.gov; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson Repowering Project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1125-1

The project will significantly add additional pollutants in the air in the general area including greenhouse gases, nitrogen oxides, sulfur oxides, volatile organic chemicals, carbon monoxide, particulate matter (PM10) and particulate matter (PM2.5). I live one block from the Grayson plant, myself and my neighbors will be impacted personally and fully with harm by this project. 1125-2

Glendale has already exceeded the capacity it needs to produce power. Any new additional power production is not justified with the 2015 IRP projects peak demand falling from 350 MW today to 300 MW by 2035, and the expansion would provide GWP with a net supply capacity of about 490 MW. This expansion would create a supply-demand buffer of roughly 63% or nearly doubles what GWP itself believes are sufficient to meet reliability and reserve requirements with a buffer of 32% over peak demand. 1125-3

Glendale Water and Power needs to focus more on replacing existing power generation with renewable sources + storage + energy efficiency + demand management to meet its region's needs. Renewable prices are falling rapidly, in many places, solar and wind power are already cheaper than fossil fuels and they are much less harmful to the environment. 1125-4

The Grayson expansion project is in direct conflict with California state legislation: SB100 which calls for California to eliminate fossil fuels from the electric grid by 2045 – this bill is currently making its way through the legislature. When it passes, GWP will have to close or alter the Grayson plant to comply with the state law. The projected increase in greenhouse gas emissions is also inconsistent with Glendale City Council's membership in the Mayors National Climate Action Agenda. 1125-5

And finally, a \$500 million Grayson plant expansion that isn't justified of its need to meet demand capacity, to provide viable benefits to the utility rate payers, or to provide a clean operating environment for the thousands of surrounding area residents and employees of the 1125-6

nearby businesses should take a pause, and the Glendale City Council should seek an independent clean energy alternatives study by a group with strong clean energy credentials.

↑ 1125-6  
●

Regards,

William Chiu  
Glendale

**Krause, Erik**

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**From:** Youssef Ebrahim <yebrahi750@student.glendale.edu>  
**Sent:** Monday, November 20, 2017 1:54 PM  
**To:** Krause, Erik  
**Subject:** Protesting City GWP Fossil Fuel Expansion

As a Glendale resident for over 20 years, I am asking you politely to contest this change in our GWP. We do not need any excess pollution, its smoggy enough as It is. Every Glendale resident is going to have negative health side effects from this. You and your associates are in office for the good of the people, please take actions for the good of the people. Thank you!

1126-1

**Krause, Erik**

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**From:** Zina Denevan <zinadenevan@gmail.com>  
**Sent:** Monday, November 20, 2017 12:40 PM  
**To:** Krause, Erik  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1127-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1127-2

Regards,

Zina Denevan (Los Angeles)

Sent from my iPhone

**From:** [Joanne Hedge](#)  
**To:** [Zurn, Stephen](#); [Golanian, Roubik](#)  
**Cc:** [Najarian, Ara](#); [Sinanyan, Zareh](#); [Devine, Paula](#); [Gharpetian, Vartan](#); [Agajanian, Vrej](#)  
**Subject:** Fwd: TAKE ACTION: Glendale could build dangerous gas-fired power plant  
**Date:** Tuesday, November 14, 2017 9:30:01 AM

1128

For your information. Earthjustice is a longtime, respected national environmental and public health advocacy and legal nonprofit. As you are aware, several area residents oppose the current re-powering plan by GWP of Grayson, making the points in and calling for alternatives akin to the information in the notice below.

1128-1

Joanne Hedge, Glendale Rancho

Thousands of people live and work directly within the Grayson project's impact zone—schools, daycares, homes for the elderly, and work offices.



**TAKE ACTION! Help protect Glendale from a dangerous gas-fired power plant**

**TAKE ACTION**



We have the means to power our city with renewable energy.

**Reject plants to rebuild a dangerous gas-fired power plant in Glendale in favor of clean energy alternatives!**

Dear Joanne,

Just up the 5 from Glendale, thousands of people in Porter Ranch are still sick after the nation's worst-ever gas blowout at the Aliso Canyon Storage Facility. Now the city of Glendale wants to build a new natural gas power plant in our backyard that would get its gas from Aliso Canyon.

Natural gas puts the Glendale community at risk. In Porter Ranch, thousands of families were displaced, over 100,000 tons of methane were released, and community members are finding high levels of uranium, lithium and multiple carcinogens in their blood. And two years later, no one will tell the community why

the disaster happened. **Meanwhile, the proposed Glendale project would be sited on a mapped liquefaction hazard zone, which makes it vulnerable to earthquake damage and rupture risks. It has no place in our future.**

**When our communities fight back against these unnecessary gas power plants, we win. The community of Oxnard just fought off a major natural gas power plant that was planned for its beach—and Glendale can do the same thing with the proposed Grayson power plant. Tell Glendale Water & Power that natural gas should be a thing of the past, not a new fossil fuel project in our community.**

**The proposed 262-megawatt fossil fuel power plant would cost the community \$500 million while putting our health and our safety at risk. That’s an absurd price to pay for power we don’t need.** Without Grayson, the city has enough energy capacity to meet our needs nearly every day of the year. Sometimes we need a little more to meet our summertime spikes, but that can be met with things like solar, batteries, energy efficiency and demand response. With Grayson, Glendale will be sitting on—and Glendale residents will be paying for—40% more electricity than we need even during peak times.

Meanwhile, California is sprinting toward a clean energy future. Glendale has the technology and the resources to invest in clean energy, so why rebuild the Grayson fossil fuel power plant and let it pollute the city, and our lungs, for decades? They call it a “repower,” but actually a whole new power plant would be built on the site where the old Grayson will be torn down.

**Tell city officials that the community wants clean energy alternatives instead of a dangerous and expensive fossil fuel dinosaur.**

Sincerely,



**Angela Johnson  
Meszaros**  
Staff Attorney  
California Regional  
Office

**TAKE ACTION**

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**Earthjustice**

50 California Street, Suite 500  
San Francisco, CA 94111  
[action@earthjustice.org](mailto:action@earthjustice.org)

*Photo Credit: Grayson Power Plant (Glendale Water and Power)*

© 2017



**From:** [Layla Kim](#)  
**To:** [Najarian, Ara](#); [Devine, Paula](#); [Agajanian, Vrej](#); [Gharpetian, Vartan](#); [Sinanyan, Zareh](#)  
**Subject:** Grayson power project  
**Date:** Sunday, November 19, 2017 3:33:10 PM

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1129

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

1129-1

My children attend school in Glendale and we are frequent patrons of many Glendale businesses.

1129-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

1129-3

Regards,

Layla Kim  
Atwater Village

**From:** [leah paul](#)  
**To:** [Gharpetian, Vartan](#)  
**Subject:** Grayson Opposition  
**Date:** Saturday, November 18, 2017 7:01:27 PM

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1130

Dear Glendale City Council,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 1130-1

I am in the process of shopping for a home and have wanted to move to Glendale, but if this project goes through I will be reconsidering that decision. I value the health of my family over any business choice and this sounds scary and dangerous. 1130-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 1130-3

Regards,

Leah Paul, Los Angeles

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[leahpaul.bandcamp.com](http://leahpaul.bandcamp.com)  
[www.leahpaul.com](http://www.leahpaul.com)

**From:** [Sara Lee](#)  
**To:** [Gharpetian, Vartan](#)  
**Subject:** GWP alternatives  
**Date:** Saturday, November 18, 2017 6:28:31 PM

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1131

Dear M. Gharpetian,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

1131-1

I live right next door in Los Angeles but have many friends in Glendale and frequent Glendale at least 3-4 times per week.

1131-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

1131-3

Please be forward thinking for our communities.

Regards,  
Sara Lee, Los Angeles

**From:** [Jane Lawton Moore](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov); [president@tera90041.org](mailto:president@tera90041.org); [EAPD.LA@gmail.com](mailto:EAPD.LA@gmail.com)  
**Subject:** Scholl Dump - stop expansion  
**Date:** Thursday, November 09, 2017 5:10:59 PM

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Dear Dennis Joe,

I'm writing you concerning the Scholl Dump Expansion Plan. I am a Glendale resident and have resided here for over 12 years. I'm greatly concerned about the expansion of the dump which has no liner protecting it from seeping into groundwater and to our local soil. Furthermore I am 100% against the plan to build a plant at the dump where we will suffer increased emissions. I'm also greatly against the Grayson Power Plant Expansion Plan. Our community and environment will suffer the choices city council makes today if both these expansions go forward.

Thank you for receiving my email and I hope you will reconsider these decisions immediately.

Sincerely,

Jane Potelle  
Concerned Resident and Parent in Glendale

**From:** Burt Culver <[ballast@gmail.com](mailto:ballast@gmail.com)>  
**Date:** November 20, 2017 at 2:48:25 PM MST  
**To:** [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)  
**Cc:** [vgharpetian@glendaleca.gov](mailto:vgharpetian@glendaleca.gov), "Devine, Paula" <[pdevine@glendaleca.gov](mailto:pdevine@glendaleca.gov)>, [vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov), [zsinanyan@glendaleca.gov](mailto:zsinanyan@glendaleca.gov), [anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov)  
**Subject:** Grayson EIR - GWP misinformation campaign

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR.

Throughout the comment period, Glendale Water & Power has been actively putting out misinformation to the public on City of Glendale websites. This misinformation included a page called "The Clean Air of Facts" on the city webpage. This was presented beneath a link on how citizens could protect themselves from "Fake News". GWP's points were so absurd that I wrote an item by item refutation of them. I am sending them in as comments to show how the utility and the city has actively attempted to mislead the public about the expansion of the plant.

<http://stopgrayson.com/2017/11/05/rebuttal-glendales-clean-air-facts/>

NOVEMBER 5, 2017 BY BURT CULVER

## Rebuttal to Glendale's "The Clean Air of Facts"

I saw an article on the Glendale news website called "The Clean Air of Facts". It is so poorly researched and reads like such thin propaganda that I had to reprint it here with a breakdown of how Glendale is trying to pull the rug over our eyes when it comes to Grayson. Here's the original article as a pdf if you want to read it on its own or if they decide to change it. In my research for this I found that Glendale has put this list of their fictions up in one form or another in several places like here, here, and here. The link to the article was sent to me by Eliza Papazian, the PR person for Glendale out of City Manager Ochoa's office, in response to my submitting comments to the Grayson Expansion draft Environmental Impact Report (DEIR).

I'll put the **original article in Red** and intersperse my comments in Black. I'll put **quotes from their documents in Blue**.

### *The Clean Air of Facts (I love puns!)*

October 20, 2017 (This was published the day after the 2nd public hearing. I guess this is a summary of what GWP found wrong with what the public thought of their plans)

Recent conversation about the Grayson Repowering Project has resulted in the publication of misinformation by individuals and groups. Rumors regarding Health and Environmental risks have sprouted, causing the spread of inaccurate and incomplete information.

1133-1

1133-2

1133-3

1133-4

1133-5

In other words, people are actually reading our 5000 page draft EIR and finding all the stuff we are legally required to write but tried to hide in appendixes, awkwardly worded statements, and obfuscated facts.

The best policy is to rely on facts.

That's why we're putting up this clarification for you.

It's with this simple idea that we bring the residents of Glendale the following information about the Grayson Repowering Project.

This article is looong. Who is the city paying to write all this? I thought they were on a tight budget.

Fact vs. Fiction

**FICTION: The City is proposing the expansion of the Grayson Power Plant.**

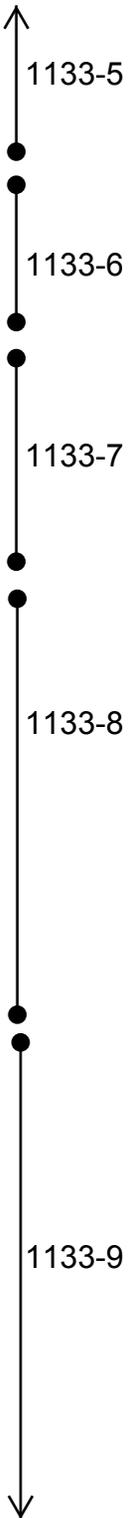
**FACT: Glendale Water & Power (GWP) is not proposing to expand the Grayson Power Plant.**

The final plant will be 33% larger in megawatt capacity than the current configuration. This is in the IRP and EIR (see below). They actually can't call it an expansion because then they would get in trouble with the Air Resources Board who approves rebuilding power plants with grandfathered pollution permits.

The driving force for replacing the obsolete Units 1-5 and 8\* at the Grayson Power Plant is to ensure a reliable electric supply for the citizens and [sic] residents of the City of Glendale. A majority of the facilities located at the Grayson Power Plant were completed between 1941 and 1977.

The city is expanding the plant. The new plant will be larger. This is from the DEIR – “The generating capacity would increase from 267 megawatts (MW) net to 310 MW net (an increase of 43 MW net)”

Here's one of their charts that shows the expansion:



**Table 2-1 Comparative Summary of Grayson Power Plant Existing and Proposed Generation Capacity (Gross and Net) at Average Annual Conditions**

Generation Unit	Generation Capacity <sup>5</sup> (gross net)
<b>Existing</b>	
Unit 1 – steam turbine-generator	20 MW/18 MW
Unit 2 – steam turbine-generator	20 MW/18 MW
Unit 3 – steam boiler turbine-generator	20 MW/18 MW
Unit 4 – steam boiler turbine-generator	44 MW/42 MW
Unit 5 – steam boiler turbine-generator	44 MW/42 MW
Unit 8A– gas turbine-generator combined cycle plant	32.2 MW/26 MW
Unit 8BC – gas turbine-generator combined cycle plant	55 MW/55 MW
<b>Generation Capacity Removed:</b>	<b>235 MW/219 MW</b>
Unit 9 – Simple cycle turbine generator to remain	50.5 MW/48 MW
<b>Total Existing Generation Capacity:</b>	<b>286 MW/267 MW</b>
<b>Proposed</b>	
Unit 10 - one-on-one combined cycle unit	74.6 MW/71 MW
Unit 11 - one-on-one combined cycle unit	74.6 MW/71 MW
Unit 12 - simple cycle unit	63.9 MW/60 MW
Unit 13 - simple cycle unit	63.9 MW/60 MW
<b>Generation Capacity Added:</b>	<b>278 MW/262 MW</b>
Unit 9 – Simple cycle turbine generator to remain	50.5 MW/48 MW
<b>Total Proposed Generation Capacity:</b>	<b>328 MW/310 MW</b>
<b>NET GENERATION INCREASE:</b>	<b>42 MW/43 MW</b>

As shown in Table 2-1, the Project includes replacing 235 MW gross (219 MW net) of generation capacity with 278 MW gross (262 MW net) of generation capacity. The Project would increase the total Grayson Power Plant generation capacity from 286 MW gross (267 MW net) to 328 MW gross (310 MW net), for a net increase of 42 MW gross (43 MW net).

**That’s already an expansion but it isn’t the whole picture!** Unit 1 and Unit 2 haven’t been used for years. So you can’t really count that as “current generation capacity”. So we should use the current generation capacity for the baseline. This is what GWP used in the IRP as their current capacity:

1133-9

Plant (Contract) Name	Primary Fuel and Unit Type	Capacity (MW)	Comments
Grayson 3	Natural Gas ST	17	
Grayson 4	LFG/ Natural Gas ST	28	
Grayson 5	Natural Gas ST	38	
Grayson 8A	Natural Gas CC	34	
Grayson 8B/C	Natural Gas CC	68	
Grayson 9	Natural Gas CT	48	
Magnolia	Natural Gas CC	47.0	
Palo Verde	Nuclear	9.5	
Intermountain	Coal	38.0	
San Juan	Coal	19.0	
Hoover Dam	Hydro	17.0	
High Winds	Wind	3.0	3 MW of energy delivered 24x7
SW Wyoming Wind	Wind	10.0	24x7 Winter period
Ormat	Geothermal	2.1	
Pebble Springs	Wind	20.0	10 MW 24x7 March-October
Tieton	Hydro	9.0	Energy is shaped to the summer
Skylar Sales		35.0	24x7 Glendale Energy Sales at Mead
Skylar Purchase		50.0	7x16 Purchase of power at Mead (50% REC; 50% of WECC average CO2)

1133-9

The actual capacities of the units.

As you can see the capacity of units 1-5 and 8 are currently capable of producing up to 185 MW. The Draft EIR states that the new units are designed with a capacity of 262 MW. This is a **33% increase in total plant capacity**.

We are proposing to rebuild substantial portions of the plant by taking old generating units out of commission, dismantling them, and building new, modern units in their place. The new repowered units will be cleaner, more energy efficient, and increase reliability of Glendale's power grid.

1133-10

The new units really are cleaner *per megawatt-hour* of power produced, but GWP wants to produce a lot more megawatt-hours of power (more on that later).

\* Units 6 and 7 were retired several years ago and dismantled. Unit 9 is about 15 years old and will continue to operate.

1133-11

There is no denying that the old power units are old. What has not been provided in the DEIR are the costs to maintain these old units. They are proposing a new plant that will cost \$16 million per year over 30 years. All of the repairs and upgrades on these old units has not been \$16 million per year. Their only analysis of keeping the old plant was to just let it fail. Like if you had an old car and you just stopped changing its oil and transmission fluids because once it dies you could buy that new Maserati you've had your eye on. Anyway, they repeat themselves a lot so we'll discuss this later.

1133-11

**FICTION: The cost of repowering the Grayson Power Plant is excessive.**

**FACT: GWP is proposing to finance the repowering project through the issuance of bonds. GWP regularly sells bonds to finance capital projects, and the payments for the GWP bonds are covered by the revenue that GWP receives from its customers based on its rate schedule. The tax revenues that the City receives are not used to pay off GWP bonds.**

1133-12

How do they say this without saying the pricetag? According to their website this will cost \$500 million or **1/2 Billion dollars** or \$16 million per year for 30 years or one of the largest bond issuances in Glendale history. It would certainly be the largest bond issuance that hasn't had voter approval. That is \$5,857.68 per electric customer! Plus all the cost of natural gas, maintenance, and labor costs to power it for 30 years. That sounds excessive to me. (Note that I couldn't find a history of every bond ever issued by Glendale it's almost like they don't want us to remember all those past bonds.)

We found the \$500 million figure on the old FAQ on the official Grayson Repowering website. But, guess what – recently they removed it and replaced it with lots of text from this list of Fictions and it doesn't include a cost estimate. They are trying to hide the fact that it is estimated to cost \$500 million dollars!



## 2. How much will the project cost and how will it affect the electric rates?

The estimated cost for the proposed project is \$500 million. The final cost will not be determined until the detailed design and regulatory analyses are finalized. It would require the sale of bonds to finance the project. Although payment of the bonds will be included in the revenue requirements, there will be avoided costs that will offset the costs. For example, there will be avoided costs from transmission and other services that we have to purchase in order to provide reliable service and comply with mandatory requirements. A more detailed cost analysis is underway.

The \$500 million bill they want to hide.

Someone pointed out to me that those bonds at 30 years at 4% interest will cost Glendale a total of **\$850 million!**

The repowering will not have a significant impact on rates. For example, the cost of generation at the repowered plant will be less (more efficient units burn less natural gas to produce the same amount of energy),

Right now much of the natural gas burned at Grayson is biogas that is free from the Scholl Canyon landfill. The new turbines can't burn biogas so they will be burning more natural gas in the new units to produce the same amount of energy. The biogas will be burnt in a new separate power plant at Scholl Canyon Landfill (more on that later).

and for short-term energy needs, the new units can deliver energy more cheaply than spot market power purchases that must be imported with their associated transmission costs. Additionally, the new units will be able to provide spinning reserve (on-line generation that can respond to losses in supply) more cheaply than purchasing and importing spinning reserve capacity from other sources.

From their Integrated Resource Plan (IRP) which came in 2015 before the new renewable mandate of 50% by 2030, by the way. "The 250D portfolio achieves the lowest cost [per MW] as a result of significant market sales opportunities that develop with 140 MW of efficient combined cycle capacity." The 250D project is the one they selected. It's the largest and dirtiest one of the four they looked at and they claim it won't impact the ratepayers because they plan to run it at full capacity to sell the power to other cities around California. So, yes the new units are cleaner per hour of energy produced but they have plans to generate many, many, many more hours of energy to sell. But what about that renewable mandate? At a time when other utilities are going to be trying to have less dirty energy in their portfolios, GWP will be trying to recoup \$500 million selling them dirty energy. Then if SB-100 passes next session the demand for dirty

1133-12

1133-13

1133-14

energy is going to go to zero and we may have a stranded asset in order to go to 100% renewable by 2045.

Remember that these bonds will have to be repaid with interest by the City of Glendale whether the plant makes money or not. If it is destroyed in the big one (see below) or is stranded, we still have to pay the debt.

Watch the [video here to see how GWP](#) was very excited about the idea of selling power in 2015 when they finalized the IRP and were starting on the DEIR. Their consultant directly states that GWP really only needs 200 MWs and that the rest could be sold to help pay for the plant. The IRP recommends they find a long term buyer. Suddenly, in 2017 they are saying they don't want to sell power but *sales was the basis for choosing the largest plant in the IRP and the DEIR!*

**GWP is currently undertaking a cost-of-service analysis that will consider all GWP activities necessary to reliably deliver electricity within Glendale that are funded by rates, including capital projects such as the Grayson Repower. The development of a rate case is currently underway and estimated to be completed in February 2018. This rate case is not a result of the proposed project, rather an analysis of electric rates and the cost of providing and delivering reliable power to customer's homes.**

Keep in mind that a portion of our rates and GWP's profits are given to the City treasury to prop up the city's budget. By generating more electricity and selling it to other cities, the city will get a boost in their budget. More pollution from Grayson for more revenue – that sounds like an awful way to balance a budget.

**FICTION: The Grayson Power Plant does not need repowering.**

**FACT: The current units at the Grayson Power Plant are well beyond their useful life. Unit 3 is currently out of service. The remaining units (1, 2, 4, 5, and 8) are all 40 to 70 years old and are not expected to continue running much longer and maintenance on these units is temporary and very costly.**

Once again they don't provide numbers for this. How much will it cost to maintain these old boilers? Will it cost \$16 million per year – that's the prorated cost of the new plant. If they can hobble along for 10 years that will make a huge difference in renewable alternatives. Plus if SB-100 passes next year we'll at least know that the lifespan of a new plant is even shorter than expected.

The problem is that since Mr. Zurn took over they've skimmed on maintenance. They did re-tube unit 4 not long ago at a cost of \$4.5 million, so that unit is in pretty good shape. They could do the same with the others. The idea that they need to do something urgent begs the question of why they waited from the middle of 2015 when they prepared the repowering plan to the middle of 2017 when they came out with the Draft EIR. Where was the sense of urgency then?

1133-14

1133-15

1133-16

If GWP does not repower the Grayson Power Plant, after Units 1 – 8 are no longer available, GWP sources of supply will be limited to:

- Approximately 100 Megawatts (MW)\*\* of purchased power that comes from the northwest to southern California over the Pacific DC Intertie, and then through the LADWP system for delivery to the GWP system
- Approximately 100 MW (some owned, some purchased) that comes from the southwest (Arizona, Nevada, Utah, and elsewhere) to southern California over three different transmission lines, and then through the LADWP system for delivery to the GWP system.
- GWP's 39 MW from Burbank Water and Power's Magnolia Power Plant
- 48 MW from the remaining Unit 9 at Grayson

These four sources total 287 MW if everything is running (leaving no reserves to cover the loss of one of these sources). GWP's peak load is 350 MW and occurs during the summer or during a heat wave. This is when surrounding utilities also experience their peak loads. GWP would make every effort to purchase additional power to cover shortfalls. However, GWP's options are limited. GWP's ties to other electric systems for large power imports are limited to LADWP and what can only be brought through LADWP. If additional sources could not be contracted, then demand would exceed supply and the City would experience rolling blackouts.

During construction they plan to take out the old units immediately and go three full years with only unit 9 at Grayson. Their plan is to buy power on an interim basis from LADWP, but only 25 MW in the winter and 75 MW in the summer. If 75 MW is enough to cover peak summer needs for three years, why do they suddenly need 262 MW from the new expanded units?

In the past, LADWP has on an emergency basis provided spot supplies of power to tide GWP over. However, that was at a time when GWP has the Grayson Units operating and supplying some amount of power. With no Grayson Units except for Unit 9 available to operate, the request that GWP would make of LADWP could be more than they could supply. Thus, GWP and the residents of Glendale would be left in a precarious position.

Glendale is part of the Los Angeles Balancing Area and we have a contract for power in emergency situations. We pay for the rights to emergency power like insurance with a marginal cost if used or not. We pay extra for that energy if we need it and they would pay significant penalties if they didn't have the power when requested. We currently only contract for 40MW of emergency power but we can adjust that amount given notice. The cost for a 100MW reserve would be \$3 to \$4 million per year – again far below the \$16 million per year cost of a new power plant.

\*\*A Megawatt (MW) equals 1,000 kilowatts of power This is a fact.

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We will have to purchase the power from another source outside our control, which will be more expensive and unreliable. GWP has been unable to obtain long term contracts for capacity in excess of 200 MW. The alternative is to purchase the power from another source and factor that into the rate structure. It will be more cost effective to the rate payers to finance the repowering project than to purchase the power from another source.

Look at what GWP itself said in their 2015 IRP: “Given current supply and peak load expectations, GWP currently maintains a sufficient capacity margin to support reliability and reserve requirements.” At that time, GWP enjoyed a supply capacity of 423 MW (233 MW from existing Grayson, plus 190 MW of imported power). To our knowledge, there have been no reductions in supply since then other than the termination of San Juan coal (~20 MW). Therefore, current supply should be slightly over 400 MW. If current peak demand is 350 MW, as GWP states, then we can establish that a buffer of 15% over peak load is sufficient in their estimation to support reliability and reserve requirements. Their words, not ours. But the proposed expansion would leave GWP with a net supply of about 490 MW (310 MW from the new units plus the existing unit 9, 12 MW from the Scholl Canyon biogas generation project, and the remaining 170 MW of imported capacity). This would represent a supply-demand buffer of roughly 40%. They have not refuted this because they can’t – these are all their numbers.

Finally, they go for another red herring. No one is saying do nothing. What we’re saying is do something more sensible, such as invest in technologies of the future not those of the past.

**FICTION: GWP is repowering Grayson to generate excess power in order to sell it for profit.**

**FACT: We are proposing to repower the plant to meet the City’s load demand and to ensure that there is a reliable source of power for Glendale. GWP is not repowering to sell energy for a profit. The capacity of the Grayson repower was driven solely by the reliability needs of Glendale and minimizing rate impacts to GWP customers. GWP is a publicly owned utility and our mission is to provide clean and reliable power to our residents and businesses.**

If they are not proposing to generate excess power for sale, why did they say in the 2015 IRP that this project relies on market sales:

“The 250D portfolio achieves the lowest cost as a result of significant market sales opportunities that develop with 140 MW of efficient combined cycle capacity“

“Similar to 250D, the 250A and 250B portfolios also build more capacity than is needed for future peak load expectations, but since they comprise only simple cycle capacity additions, they do not realize the benefit of sufficient market sales to offset the fixed capital costs of construction.”

“The 250D portfolio offers a hedge against high market prices, but relies heavily on market sales, suggesting that a long-term offtake agreement may be recommended.”

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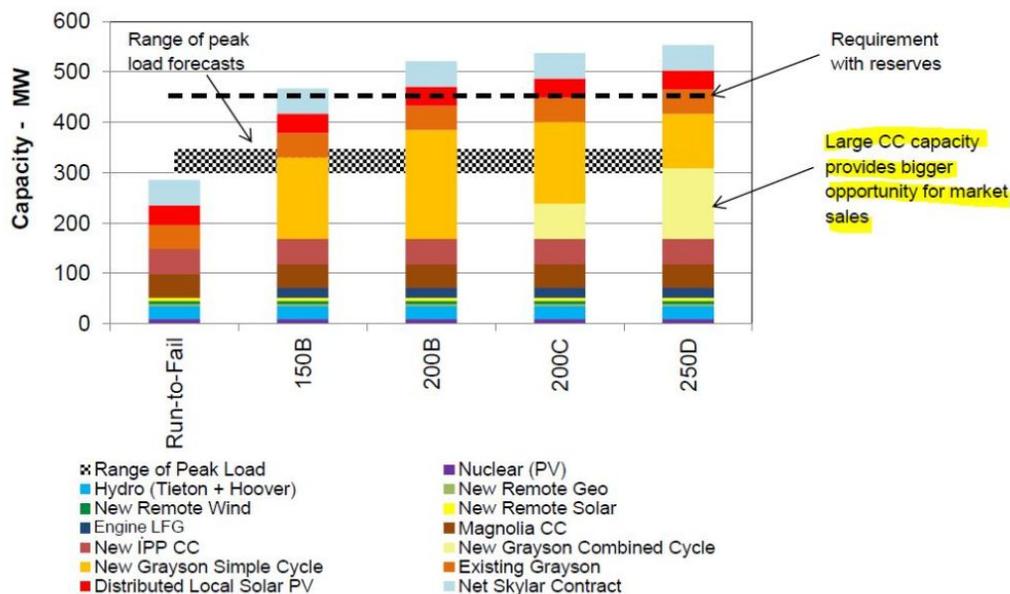
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“While the ability to sell excess energy is a likely benefit, the magnitude of sales can pose a risk without a contracted long-term energy or capacity off-taker. Therefore, the magnitude of net sales in relation to total portfolio costs has been recorded for all portfolios. While 150B and 200B have minimal net sales, the revenues from sales in the 250D case **represent over 25% of total portfolio costs.**”

Why did they explicitly recommend finding a long term buyer? Why did their own consultant say they don't need as much as they are building but that's OK because they can sell the rest?

Here it is in a big chart from the IRP:

**Exhibit 42: Supply and Demand Balance for Integrated Portfolio Options - 2030**



The idea of sales isn't something we came up with – we got it from GWP's own documents and statements.

They do make a point of slipping that “for profit” phrase in there whenever they mention sales. Then they emphasize that they are doing it to minimize rate impacts to GWP customers and that they are a public utility. Right, so they aren't an investor owned utility so they aren't selling “for a profit” but they are definitely planning on selling power to other cities. They are planning to increase pollution plain and simple.

**FICTION: Glendale doesn't need this much power and doesn't need to build such a large plant.**

**FACT: The capacity of the Grayson Repowering Project is driven to reliably serve the needs of the residents and businesses of Glendale. Without the Grayson Repowering and after Units 1 – 8**

are no longer capable of running, the available capacity through imports from outside sources and and the one newer unit at Grayson Power Plant – Unit 9 – is 287 MW.

GWP must have in place sufficient reserve sources of power to cover the “loss of the single largest contingency.” This means that we must maintain enough generating capacity to power the City even if there is an unexpected failure or loss of our largest single source of power. For GWP, the single largest source of power is the DC Intertie line, which transmits 100 MW of power to the City. See image of GWP’s sources of power here. In fact, partial and complete loss of the DC Intertie line has occurred in the past, and some of the outages have been for extended periods of time. In addition, reserves must also be in place to reestablish reserves within one hour. With the loss of GWP’s single largest contingency, the City would have only 187 MW of supply available for meeting its obligations.

Their own consultants said they don’t need this much power (it’s on tape). End of story. Also, see above where they plan to have an oversupply of 40% over max peak load. Also, if they increase their insurance with the balancing authority as outlined above they will have their single largest contingency covered.

GWP’s system load exceeds 187 MW more than 80 days a year. [DEIR page 347 – 81 days. Why do they say “more than 80”? – just to make it scary I guess] With respect to a peak day, GWP’s peak load is 350 MW (with no allowance for reserve margin) and there would be a shortfall of 163 MW that would have to be supplied by resources internal to the City.

This is precisely why they should keep the other units running long enough to build up solar generating in Glendale (their own consultants said they didn’t study how much solar could be produced on sites the city has control over, let alone what could be produced on residential and commercial rooftops with the right incentives) and to invest in battery storage. And why they should look into techniques, such as time of use (TOU) pricing to drive down peak demand. If they did all that, they could reduce peak demand by 100 to 200MW and meet demand without building a new plant.

The Grayson Power Plant, once repowered, would add a capacity of 262 MW at average annual conditions (64° F). On a hot day (95° F), that capacity would fall to 242 MW. On the peak load day (100°+ F), the available capacity would be slightly less.

With 242 MW available at Grayson Power Plant, the City would have approximately 80 MW as reserve capacity. Thus, the Grayson Repower allows GWP to reliably serve Glendale by providing sufficient capacity to cover the loss of the single largest contingency and still meet load, as well as the non-operating reserve that could be started to provide the required spinning reserve.

Again, we don’t need to build our own plant to cover this contingency. That is exactly why we are members of the Balancing Area. We can cover the contingency with insurance through the Balancing Area for cheaper than building a new plant.

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Additionally, as GWP imports increasing amounts of windd [sic], solar and other variable sources of renewable energy in the City, and as more solar power is generated locally in Glendale, this creates increased fluctuations on the power grid. A steady, constant source of energy such as that from the Grayson Power Plant is needed to balance out (“firm and shape”) the energy so that a smooth and steady supply of power can be delivered to GWP customers. The old Units at Grayson Power Plant do not have the ability to reapidly adjust up and down to account for variances in solar output, based upon weather patterns on a minute-per-minute basis. Modernizing Grayson will allow GWP to manage renewable energy flows dynamically, so that energy deliveries will continue to be reliable.

1133-25

Solar + battery storage + energy efficiency + demand management can solve the problem. But how would they know when they haven’t studied this?

Again this could be handled by a small local plant and services from the Balancing Authority. Also, while it is difficult to get copies of the existing power purchase agreements to verify, a recent agreement included firming services. This is the no-bid 21-year \$650 million deal with Skylar Energy – a company which coincidentally enough has an ex-GWP energy trader as a Vice President who got the job shortly after the original deal with Skylar was signed. Steve Zurn says that Varuj “Rich” Ghazarian “did the math” for GWP on the deal shortly before going to Skylar. Nothing suspicious there.

**FICTION: GWP isn’t going to install any renewable energy sources at Grayson.**

**FACT: GWP will be placing solar panels onto the new buildings at the Grayson Power Plant, totaling approximately a ½ MW. GWP also plans to install 40 MW/80 Megawatt-hours (MWh)\*\*\* of short term battery energy storage for regulation purposes at Grayson to reduce short-term cycling of units. This will be done after the power plant is repowered.**

1133-26

This is not in the IRP or the DEIR. Why isn’t it? It would have been great to include it in the profile and reduce your emissions/MW produced. We’ve been unable to find these plans anywhere. Could you publish them?

GWP is committed to renewable energy and will continue to expand our programs to use more solar and wind power. GWP is a leader within California in supplying carbon-free electricity. In 2016 GWP sourced 64% of the energy it supplied to Glendale from carbon-free sources (compared to 44% for all of California). Glendale is already close to meeting the requirement for 2030 that publicly-owned utilities procure 50% of their electricity from eligible renewable energy resources. Today, far ahead of the 2030 target date, Glendale procures 47% of its electricity from eligible renewable energy resources. This number will only continue to grow.

1133-27

This is great. GWP is slightly above the legal minimum.

So by 2030 we can only get 50% of our power from dirty energy. So take all the capacity arguments you have above and rerun the numbers. Grayson will only be able to fill 50% of our



energy needs maximum by 2030. In 2030, 9 years after the new Grayson comes online, we will have a 310 MW dirty energy plant, 39 MW dirty energy from Burbank, and another 200 MW worth of renewable and non-renewable power contracts coming over transmission lines. We'll have a peak load of 365MW unless you address peak loads which you haven't seriously discussed. Let's say 100% of that remote power is renewable (it isn't – it's more like 100MW) – That means we'll have 349 MW of local dirty power to handle the remaining 165MW of need. That's at peak load which is a handful of days in the summer. Therefore, it looks like we'll be occasionally running Grayson about 3 months out of the year by 2030. It is **insane** to build such a large dirty plant at this time – unless you are planning on selling the extra power (but remember they will be trying to buy renewable power not dirty power). If SB-100 is passed next year as many analysts expect then GWP will need to get to 100% renewable by 2045. This is a \$500 million boondoggle.

1133-27

The council signed onto the Paris Climate Accord this year to keep a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The proposed Grayson expansion will have a **net increase in GHG Emissions of 415,832 metric tons/year** according to the DEIR. I don't see how *increasing our city's emissions by 415 thousand tons per year* can be considered in line with the Paris Climate Accord.

**GWP also provides incentives to Glendale homeowners to install solar power and has in place contracts for electricity from renewable sources. Currently, there are approximately 1,344 solar systems installed in the City, totaling 12.2 MW. This capacity is “behind the meter,” with only a portion being delivered into the GWP electric system. GWP encourages rooftop solar, and solar installations have helped to reduce the load growth within GWP. However, because the State does not allow it to be counted towards GWP's efforts to meet renewable energy mandates, this solar generation does not appear in Glendale's power resource mix.**

1133-28

Yes, you have an incentive program for Glendale homeowners. SB1, the Million Solar Roofs Initiative, requires you to do so with state funding. The program is so popular that it runs out of funds within hours of accepting applications each year. You now have a lottery to see who gets funds. Not knowing if you get an incentive makes it very difficult to plan a system and having a lottery means uncertainty which means people may put off their system until they win the lottery. Last year the state put \$959,000 into the incentive program. This funded 123 of the 188 applicants. Zero low income applicants were funded. There is an obvious need for more rebate funding. GWP should be adding to the funding to fund 100% of the installations and actively recruit low income and medical services customers. In 2015, only 758 kW capacity was installed.

\$250 million, half the proposed cost of Grayson, funding 50% of rooftop solar costs would reduce peak demand by 200MW and eliminate the need to re-power Grayson entirely.

Plus, it would take advantage of the 30% federal tax incentives to pay for our power supply and we could sell the green energy credits for the power generated. We could make Grayson a museum to how cities used to poison their air to make electricity – like Seattle's Gas Works

Park. I encourage you to put solar with battery backup on low income houses, homes with electrical medical equipment, and medical centers first. Of course, you don't really want to have that much solar in your service area because you make money when you sell electricity to customers, not when you reduce demand.

It has been pointed out that Glendale is still not in compliance of California's Solar Rights Act. Glendale continues to use zoning as a tool to prevent solar installations. Residents should not have to engage the State Attorney General to get solar projects through the planning process.

\*\*\*A megawatt hour (MWh) equals 1,000 kilowatts of electricity use for one hour. Agreed.

**FICTION: Repowered Grayson Power Plant will use potable water.**

**FACT:** The Grayson Power Plant would use recycled water for all process and cooling water requirements. The main use for recycled water includes boiler water makeup, cooling tower makeup, turbine power enhancement and cleaning, and NOx control for the simple cycle units. Recycled water would also be used for Unit 9 in place of potable water currently being used. The use of recycled water would eliminate the need for 20 acre-feet of ground water from wells in Glendale and 41 acre-feet of potable water currently being used, which is also water efficient and helps improve the City's overall water conservation efforts.

This is true, I don't remember hearing anyone contest this. But as long as you brought it up, why wasn't changing old Grayson to use recycled water part of the No Plan option? Or would you have to have had a No Plan Plus Recycled Water option?

By the way, is the recycled water that will come from the giant underground storage tank across Verdugo wash been tested for chromium-6? Grayson and the surrounding areas is a superfund site for underground chromium contamination. If it is leaking into the recycled water tank and that contaminated recycled water is used in the cooling tower then that means chromium-6 in the air.

**FICTION: California's cap and trade program requires all power producers to pay a cost per ton of CO2 emitted. The cost is being underestimated.**

**FACT:** The cost of greenhouse gas credits would be incurred by Glendale whenever it uses electricity from fossil fuel resources, whether GWP generates it or it is imported over the transmission system. Fossil fuel resources will be required until systems of energy storage have been proven on a utility scale for a utility such as GWP. The operating costs would therefore be incurred either way. Intermittent renewable purchase contracts also include a portion of fossil fuel generation.

If they replaced Grayson with the big four – solar + battery storage + energy efficiency + demand management – they don't need to pay the credits. They've estimated the credits will cost

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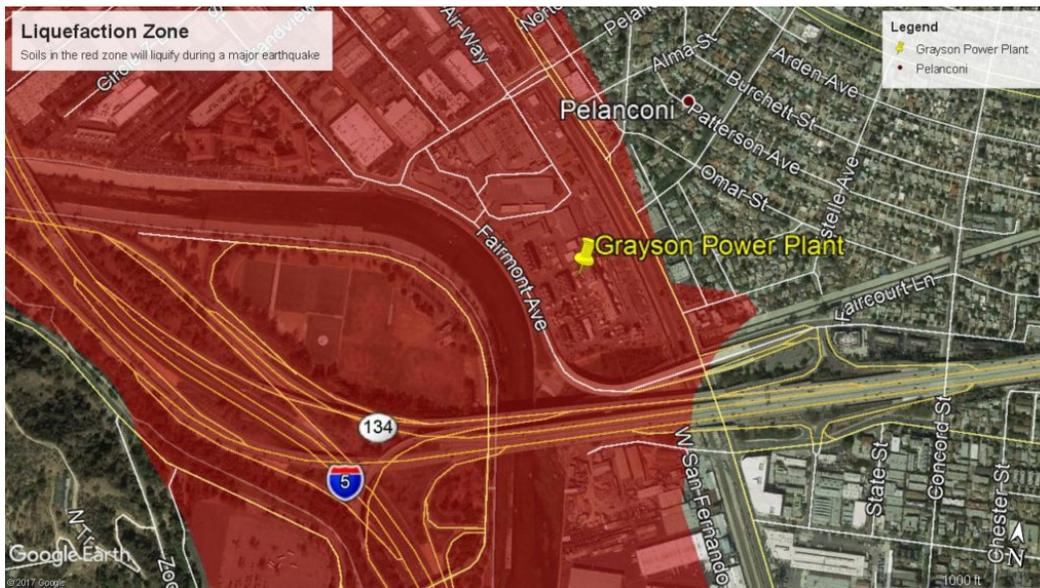
\$30 per ton in 2030. Economists forecast a low end of \$90 per ton. That's a difference of \$25 million in 2030 alone based on a net emissions increase of 415,000 tons of CO<sub>2</sub>e.

**FICTION: The Grayson Power Plant sits on a mapped Liquefaction Hazard Zone which makes it susceptible to ground movement in the event of an earthquake.**

**FACT: Like much of the Glendale are, the Grayson Power Plant site is located within a liquefaction hazard zone. A site-specific geotechnical study for the repowering project was performed and included analysis of seismic and liquefaction risks. The geotechnical study included recommendations for project design in conformance with applicable building codes, which include considerations for seismic and site-specific liquefaction hazards.**

Wait, you just agreed that the Grayson Power Plant sits on a mapped Liquefaction Hazard Zone and that it is susceptible to ground movement in the event of an earthquake. You're just arguing with yourself now.

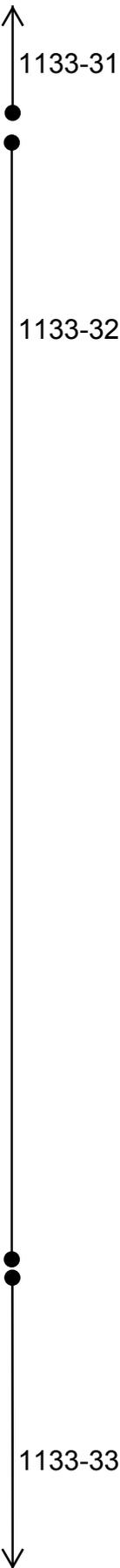
“Like much of Glendale”? Wow, nice try at normalizing. It looks like maybe 25%. Here are links to the large Liquefaction Hazard Zone maps ([West Glendale](#), [East Glendale](#)). Here's a snapshot of the area around the plant:



Grayson sits on an Earthquake liquefaction zone.

The site has been the home of the City's local generation for over 75 years and has been subjected to several major earthquakes, including the Sylmar and Northridge earthquakes. Notably, GWP has been able to restore electricity to its customers faster than any other nearby city or Southern California Edison, in part due to having local units at Grayson that were either already operating or were started up, due to seismically-induced loss transmission imports.

The LA River area is particular vulnerable to liquefaction. Sylmar was a 6.6 magnitude earthquake. Experts say we need to be prepared for an 8.2 magnitude on the San Andreas fault.



An 8.2 quake would be **250 times stronger than Sylmar**. It is highly likely that in the event of a magnitude 7.0 or larger quake, ground movement would be enough to sever gas pipes, leading at worst to gas leaks, explosions, and fires, and at best to incapacitating the major source of power Glendale hopes to rely on in just such a situation. This type of risk is best mitigated with a distributed solution based on a combination of solar, battery storage and micro-grid infrastructure and not one built around a single point of failure.

**FICTION: GWP didn't consider solar panels and batteries to power Glendale.**

**FACT: Utilizing solar power alone, whether generated locally or imported, would require a significant storage system to be built to "time shift" enough energy to cover approximately 65% of the hours that the sun is shining (the 65% value considers the variability of solar energy while the sun is shining). Such a system would be larger than any projects currently being contemplated or constructed to date, and is estimated to cost significantly more than the proposed project. AS with all energy projects, battery storage projects also have ongoing costs, in the case the periodic replacement of the batteries and the efficient recycling of batteries.**

That's why you shouldn't look at solar power alone as a solution. It's called a "straw man" argument when you inaccurately reframe an argument so that you can easily take it down.

**If solar power imported over transmission lines (along with other carbon-free imports over those same transmission lines) was relied upon as the source of power, most of it would be consumed during the daytime, leaving little, if any, for charging the batteries. During the evening, when the transmission capacity exceeds the GWP load, solar power is not available. Thus, the batteries would be charged using non-solar carbon-free resources, and if they were not sufficient, then other fossil fuels resources.**

This is why solar has to be combined with a battery system. During the day our needs could be met with transmission line power, 200 MW rooftop solar, battery, and local generation. At night, transmission power and local generation would power and refill the batteries. Local generation means Magnolia and Unit 9. If Glendale would study these options we could find one that fits.

**For a utility scale solar power plant located within Glendale, a large site would be needed to generate sufficient energy to serve daytime load and charge the batteries. For each megawatt of solar generation installed, approximately 4 to 6 acres are required. To provide the 262 MW that would be required to replace the units that would be lost at the Grayson Power Plant would require approximately 1,310 acres, or approximately 2 square miles. Such a large space is not available in Glendale.**

No one seriously thinks that utility-scale solar would fit in Glendale. This is some idea GWP's consultants came up with so that they could turn down solar (see straw man argument above). But actually, this shows your mindset – you'd look at utility-scale solar where you could produce the energy and sell it to customers at a profit before you would consider large scale rooftop solar which reduces the need for power plants and reduces your profit.

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Rooftop solar is another potential source of solar energy, and GWP provides incentives to Glendale homeowners to install solar power on their roofs. Currently, there are approximately 1,344 solar systems installed in the City, totaling 12.2 MW. Those systems are estimated to generation approximately 16.5 MWh of energy.

1133-37

See above – your incentive system is chronically underfunded and restricts installations.

However, the City cannot count on solar generation on private residential and commercial properties as it does not have control over these systems.

Why can't you count on solar generation on private property? You enter power purchase agreements with private companies all the time. Why would it be different for small systems? If that doesn't work for you then put out a request for offer for 200MW worth of rooftop solar to be installed and let the private sector deal with the leases, sales, and contracts with the owners. I bet SolarCity would step up to the plate.

1133-38

Solar energy sources do not necessarily need to be located within the City's limits. By freeing up transmission which would occur as a result of the Grayson Repowering Project, it would allow the City to either purchase or own solar outside the City's limits and transmit the energy into the City's electrical grid via existing transmission lines.

1133-39

So, instead of building local solar you want to build a local oversized dirty power plant so that you can import solar power from somewhere that has the foresight to build local solar? It's like the public is from Mars and the utility is from Venus or something. Do you understand how this sounds to us? You want us to breath dirtier air so that we can import energy from somewhere that is producing it cleanly? Wth?

GWP is pursuing the Grayson project because the need exists for another source of power to supplement the solar energy that could be utilized,

1133-40

We have Unit 9, Magnolia, and LA Balancing Authority, plus an old plant that still works.

**GWP's transmission import limitations**

LA just built a new line to Lancaster (which is going gangbusters with renewable energy btw) but we didn't get a part of that transmission line. In the IRP it says "For the build and own option, Pace Global relied on a report produced by Stantec on the costs of interconnection between the SCE substation at Eagle Rock and GWP's Kellogg substation. The total capital costs of the new transmission [100MW] interconnection were estimated at \$66 million, amounting to an annual cost in the "150 Series" of \$3.4 million when amortized over a long-term period at GWP's cost of debt." Then it goes on to say that renting would be cheaper but it doesn't mention that renting or buying more transmission isn't available.

1133-41

the necessity to be capable of dealing with the loss of a transmission line, and the need to add capacity as needed due to the intermittency of renewable energy (to balance out and manage the fluctuating power flows), all while still ensuring a reliable supply of electricity.

This is where our agreement with the balancing authority needs to be properly sized to our needs. We should cover our single biggest contingency with an agreement with the balancing authority as it is cheaper than building a plant that will sit idle.

GWP considered all solar and all battery but didn't fully study holistic combinations of the two in conjunction with energy efficiency and demand management. The Utility Commissioners saw this clearly and called them out on it. GWP's thinking lacks creativity which is why we are calling for an independent study by experts in clean energy. Pace who did the IRP is owned by Siemens – the makers of the gas turbines they recommend and the DEIR was done by Stantec who did the EIR for Keystone Pipeline. The DEIR shows the resumes of the engineers that worked on it and none of the main engineers had renewable power experience. We need renewable power experts to work with GWP on finding the best mix of power for our future.

**FICTION: Scholl Canyon can be used as a solar site.**

**FACT: GWP partnered with a private developer two years ago to study the possibility of developing a solar project at Scholl Canyon. The developer determined that the site constraints at Scholl Canyon made it unsuitable for solar development. For example, the existing environmental control systems for the landfill are required even for a closed landfill (these systems gather methane gas that would otherwise escape to the environment, a gas that has a global warming potential 21 times greater than CO2). Those systems require continued access, which consequently limits the land available for solar panels. In addition, the landfill is subject to significant settlement, which would take the solar panels out of alignment, as well as complicating the electrical gathering system design, necessitating regular rebuilding and realignment.**

These answers further illustrate the type of rigid thinking typical of GWP. No one is arguing for one location to meet all needs. Very significant amounts of solar power can be generated using a combination of open spaces plus city owned and private rooftops. That, coupled with storage, demand management and efficiency can meet most or all of Glendale's needs.

Note that the private developer was Skylar Energy and they were looking for 400 non-contiguous acres in Glendale.

**FICTION: The repowered plant will increase air pollution in the area.**

**FACT: The permitted emissions from the Grayson Repower project will be less than the permitted emissions from the existing Grayson Power Plant.**

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1133-44

I think they saved this one for second to last because it's complete bs. We are saying an air pollution increase and they are saying "permitted emissions" will be less. Maybe they mean that unpermitted emissions will increase? I don't know. I'm sick of so-called "experts" trying to hide behind fancy terms to justify their shell games. **Will there be more smog, carbon monoxide, and asthma-causing particulate matter coming out of the smokestacks at Grayson? An unqualified yes.** They can go on about how they are paying for permits to pollute more but at the end of the day *there will be more pollution coming out of Grayson.*

1133-44

GWP developed emissions estimates for the Grayson Repower to use as a basis for permitting. The permitting process is based in part on the worse case daily emission and peak season monthly emissions coupled with the need to provide sufficient starts and operating hours for possible contingencies. Even with these conservative estimates, the permitted emissions from the repowered plant would be less than the permitted emissions from the existing plant.

1133-45

**Table 4-37 Net Increase of GHG Emissions from the Operation**

Device/Activity	CO <sub>2</sub> (MT/year)	CH <sub>4</sub> (MT/year)	N <sub>2</sub> O (MT/year)	Total CO <sub>2</sub> e (MT/year)
SCC-800 Combined Cycle Unit 10	185,722	3.5	0.35	185,914
SCC-800 Combined Cycle Unit 11	185,722	3.5	0.35	185,914
TRENT60 Simple Cycle Unit 12	52,047	0.98	0.10	52,100
TRENT60 Simple Cycle Unit 13	52,047	0.98	0.10	52,100
Emergency Engine	12.30	0.0002	0.00002	12
SF6 releases (Fairmont Switchyard)	0	0	0	96
Facility Occupants (Operational)	213.38	0.52	0.01	270
<b>Total GHG Emissions:</b>				<b>476,406</b>
<b>Total Baseline GHG Emissions (excluding GHG emission from landfill gas combustion):</b>				<b>60,574</b>
<b>Net Increase of GHG Emissions:</b>				<b>415,832</b>
Note: Once the Boilers 3, 4, and 5 are dismantled, the landfill gas will be combusted in Biogas Renewable Project. The GHG emissions from the landfill gas combustion will be counted toward the baseline GHG emissions for the Biogas Renewable Project, which consist of construction new power generation facility at the Scholl Canyon Landfill.				

As shown in Table 4-37, the net increase of GHG emissions from the operation of the Project exceeds the significance threshold of 10,000 metric tons per year. The GHG emissions exceedance is solely contributed from operating the proposed combustion turbines and transformers. However, the Project is required comply with the State cap and trade program by reporting CO<sub>2</sub>e emissions from the Grayson Power Plant and acquiring allowances and offset credits to mitigate 100 percent of GHG emissions from the combustion equipment and transformers. Net emissions after mitigation will include only emissions related to facility occupants and will be well below the 10,000-metric ton significance threshold.



“The net increase of GHG emissions from the operation of the Project (415,832 metric tons) exceeds the significance threshold of 10,000 metric tons per year.” Yes, they will “offset” this by purchasing credits or redeeming credits or something but at the end of the day it’s more pollution in the air we breathe. Maybe the offsets mean less pollution somewhere else (like maybe the place they want to import clean energy from) but it doesn’t help us here in Glendale.

It is worth taking a look at that chart again and see that the main reduction in the baseline of Greenhouse Gas (GHG) is from their plan to move the burning of Scholl Canyon Landfill biogas to a new 12MW power plant to be built in Scholl Canyon. So, since that will be burnt elsewhere they take it off of the baseline calculation here. But then they don’t do that for all the other pollution that the plant emits. The GHG is killing us slowly but the others are killing us much faster and they are fudging those numbers. Here’s the DEIR chart showing the calculated baseline using the last three years of emissions but this includes the biogas emissions:

1133-45

**Table 4-28 PSD Annual Emissions for Prevention of Significant Deterioration Determination**

Equipment	NO <sub>2</sub> (tons/year)	CO (tons/year)	PM10 (tons/year)	SO <sub>2</sub> (tons/year)
<b>Potential Emissions from New Units</b>				
SCC-800 Unit 10	13.92	7.89	5.23	3.55
SCC-800 Unit 11	13.92	7.89	5.23	3.55
TRENT60 Unit 12	11.77	10.87	1.83	0.86
TRENT60 Unit 13	11.77	10.87	1.83	0.86
Cooling Tower (North)	0	0	0.49	0
Cooling Tower (South)	0	0	0.49	0
Emergency Engine	0.15	0.09	0.0003	0.0002
<b>Total Emissions of New Units:</b>	<b>51.53</b>	<b>37.61</b>	<b>15.1</b>	<b>8.82</b>
<b>Historic Actual Emissions from Existing Units to be Replaced</b>				
Boiler 3	3.61	5.53	1.87	0.3
Boiler 4	6.76	12.77	4.01	0.64
Boiler 5	15.92	29.2	8.04	1.23
Gas Turbine 8A	2.13	9.07	0.97	0.04
Gas Turbine 8BC	1.46	10.42	0.5	0.02
<b>Less: Total Emissions of Replaced Units:</b>	<b>29.88</b>	<b>66.99</b>	<b>15.39</b>	<b>2.23</b>
<b>Net Emissions Increase:</b>	<b>21.65</b>	<b>(29.38)</b>	<b>(0.29)</b>	<b>6.59</b>
Note:				
1. The emissions of replaced units were calculated based on the average emissions reported in SCAQMD Annual Emission Report for 2015 and 2016.				

This is what it would look like if you took out the biogas to get a realistic look at the Grayson Baseline. Keep in mind that they want to move all that biogas pollution to Scholl Canyon which means they get to increase the pollution here while having the biogas pollution count as a baseline at Grayson – therefore actually doubling those emissions in our air basin while staying just below the SCAQMD limits for Grayson with this maneuver.

Equipment	NO2 (tons/year)	CO (tons/year)	PM10 (tons/year)	SO2 (tons/year)
<b>Potential Emissions from New Units</b>				
SCC-800 Unit 10	13.92	7.89	5.23	3.55
SCC-800 Unit 11	13.92	7.89	5.23	3.55
TRENT60 Unit 12	11.77	10.87	1.83	0.86
TRENT60 Unit 13	11.77	10.87	1.83	0.86
Cooling Tower (North)	0.00	0.00	0.49	0.00
Cooling Tower (South)	0.00	0.00	0.49	0.00
Emergency Engine	0.15	0.09	0.00	0.00
<b>Total Emissions of New Units:</b>	<b>51.53</b>	<b>37.61</b>	<b>15.10</b>	<b>8.82</b>
<b>Historic Actual Emissions from Existing Units to be Replaced</b>				
Boiler 3	0.00	0.00	0.00	0.00
Boiler 4	0.00	0.00	0.00	0.00
Boiler 5	0.00	0.00	0.00	0.00
Gas Turbine 8A	2.13	9.07	0.97	0.04
Gas Turbine 8BC	1.46	10.42	0.50	0.02
<b>Less: Total Emissions of Replaced Units:</b>	<b>3.59</b>	<b>19.49</b>	<b>1.47</b>	<b>0.06</b>
<b>Net Emissions Increase:</b>	<b>47.94</b>	<b>18.12</b>	<b>13.63</b>	<b>8.76</b>

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As you can see in the chart below, there is a net increase in all emissions with the new plant. So, in theory, when the biogas has been removed and is polluting Scholl Canyon, the new plant exceeds even those emissions plus some. It already exceeds the threshold of NOx and VOCs. If you take the difference from the no-biogas baseline from the chart above it also exceeds thresholds on CO, PM10, and PM2.5.

**Table 4-26 Project Maximum Net Daily Emissions**

Pollutant	NO <sub>x</sub> (lbs./day)	CO (lbs./day)	VOC (lbs./day)	PM10 (lbs./day)	PM2.5 (lbs./day)	SO <sub>x</sub> Lbs./day
New turbines (without maint.)	648	623	179	173	173	101
New Turbines (with maint.)	1,570	1,017	191	173	173	101
New Emergency Engine	6	3	0.19	0.01	0.01	0.01
New Cooling Towers	0	0	0	5.4	5.4	0
Facility Occupancy	0.58	1.45	0.69	0.40	0.12	0.006
Less: Replaced Equipment (actual historic)	102	497	90	162	162	26
<b>Net Increase (turbines without maint.)</b>	<b>553</b>	<b>130</b>	<b>90</b>	<b>16</b>	<b>16</b>	<b>75</b>
<b>Net Increase (turbines with maint.)</b>	<b>1,475</b>	<b>524</b>	<b>102</b>	<b>16</b>	<b>16</b>	<b>75</b>
Sig. Thresholds (Operation)	55	550	55	150	55	150
Exceed Thresholds	YES	NO	YES	NO	NO	NO
Exceed Thresholds after New Source Review Offsets	NO	N/A	NO	NO	N/A	NO
<b>Note:</b>						
1. The net emissions increase does not reflect emission offsets that will be required pursuant to SCAQMD Rule 1302. With the retirement of emission offsets to offset any emission increase of NO <sub>x</sub> , VOC, PM10 and SO <sub>x</sub> ; the net increase of all pollutants will be below the significance thresholds.						
2. CO and PM2.5 emissions are not required to be offset per SCAQMD Rule 1302 nor do they exceed the applicable SCAQMD daily mass emissions thresholds.						

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The daily emissions increases of the project

The permitted emissions from the repowered plant would be greater than recent historic actual emissions from the existing plant due to the reduced operations resulting from the declining availability of the existing units.

So, you are admitting that the emissions will increase.

SCAQMD is trying to clean up our air so they look at a licensed power plant's last 3 years worth of emissions to determine how much emissions they can allow with a rebuild. This is probably why GWP hasn't already moved the biogas to the new location. They needed to increase their emission profile for the last 3 years. Had they moved the biogas previously then they wouldn't pass SCAQMD's criteria.

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However, the increase in emissions is below the mass emission levels that South Coast Air Quality Management District (AQMD) considers to be significant.

As you can see above, without even counting for the biogas pollution switcheroo, the new plant is over the mass emission levels for NOx and VOCs.

Further in the DIER it says: “Pursuant to the offset calculation methodology specified in SCAQMD Rule 1306, Glendale Water and Power will be required to purchase emission reduction credits to offset the 30-day average net emission increase in NOX, VOC, PM10 and SOX of the Project in order to obtain air permits.”

In addition, mitigating this concern are two considerations:

1. Actual operations are expected to be less than what is being permitted and assumed for analysis in the Draft Environmental Impact Report, reducing the actual change in anticipated emissions.

This is certainly not true if you count the pollution from a new biogas plant and Grayson.

2. Mass emission levels (lb/day) serve only as a coarse indication of the true impacts of a project. For the Grayson Repowering project, we conducted extensive air quality impact analyses and health risk assessments in accordance with methodologies that are recommended and approved by both South Coast AQMD and US Environmental Protection Agency (EPA) based upon both maximum peak season and annual emissions. Those refined analyses demonstrate that the impacts on ambient air quality and public health are below levels of significance. All increases in pollutants such as NOx, VOC, PM10, SOx are further mitigated by offsetting 100 percent of the emission increase, plus another 20 percent, pursuant to South Coast AQMD regulations.

Offsetting the emissions does not clean the air. You can offset all you want but the increase in emissions is going to cause new cases of asthma, cancer, and heart disease. It’s very difficult to determine the population density you used in the Cancer Burden but as far as we could determine you didn’t include the worker population of 10 to 15,000 people at Disney and DreamWorks that work right outside of the plant. Also, the maximum individual cancer risk (MICR) and Cancer Burden were not calculated to include the biogas pollution at the Scholl Canyon site which may increase the risk.

Greenhouse gas emissions (CO2) are assessed on a global basis. Greenhouse gas emissions from the project will be offset through the purchase and surrender of greenhouse gas credits to ensure that the total level of greenhouse gasses continues to decline in accordance with California policy and regulations.

You realize that increasing greenhouse gas emissions and then offsetting the increase with purchased or surrendered credits doesn’t reduce GHG emissions, right? That just maintains the

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current levels. We need to *reduce* GHG emissions if we want to stop climate change. So, increasing GHG emissions by 400k metric tons is not the right move.

You are currently emitting those 415k metric tons. Then you're going to move that pollution to Scholl and then produce *another* 415k metric tons at Grayson for **a total output of 830,000 metric tons per year!** The 415k at Scholl will not require offsets from GWP because it suddenly becomes renewable energy when it's burned at the landfill. So you are talking about **a net increase of 415,000 metric tons of GHG that is not offset.** Take some responsibility for the situation the earth is in. Taking advantage of SCAQMD loopholes to produce more greenhouse gasses when the effects of global warming are killing people, creating billions of dollars in damages, and causing the sixth extinction is immoral. Doing this while testifying to be "committed to renewable energy" and saying that Grayson won't pollute more makes you untrustworthy.

It's worth noting that if Grayson didn't exist, there is no way that the SCAQMD would permit a power plant in Glendale. The area already fails some federal air standards and they limit new pollution sources. Grayson's pollution permits are grandfathered in so instead of retiring them which would be the environmentally responsible move, GWP wants to maximize their output by increasing the size of the plant as much as possible. I'm not a fan of offsets because it just seems like a shell game but what would the pollution rights at Grayson be worth if we closed the plant and sold those offsets?

**FICTION: Demolition of the existing facility and soil remediation will take 9 months; GWP hasn't ensured contaminants won't be emitted.**

**FACT: During demolition of the existing facility, waste removal plans will be developed and implemented to ensure that no lead or asbestos or other known contaminants are emitted into the atmosphere. Demolition will be done in accordance with applicable federal, state and local requirements. These requirements address containment and handling of materials, as well as a monitoring plan to ensure compliance. These requirements are not specific to the demolition of a power plant; they apply to all demolition work. The contractors we will use are licensed to do this type of demolition and meet these requirements.**

Will Mr. Zurn provide a personal guarantee against his \$300k/yr salary that no contaminants will be released into the local community? If not, we don't want to hear weak promises. In fact, GWP does not know what it will find below the plant and how long it will take or what it will cost to clean it up. Plus the plant waste is slated to go into Scholl Canyon so we aren't really getting rid of it are we?

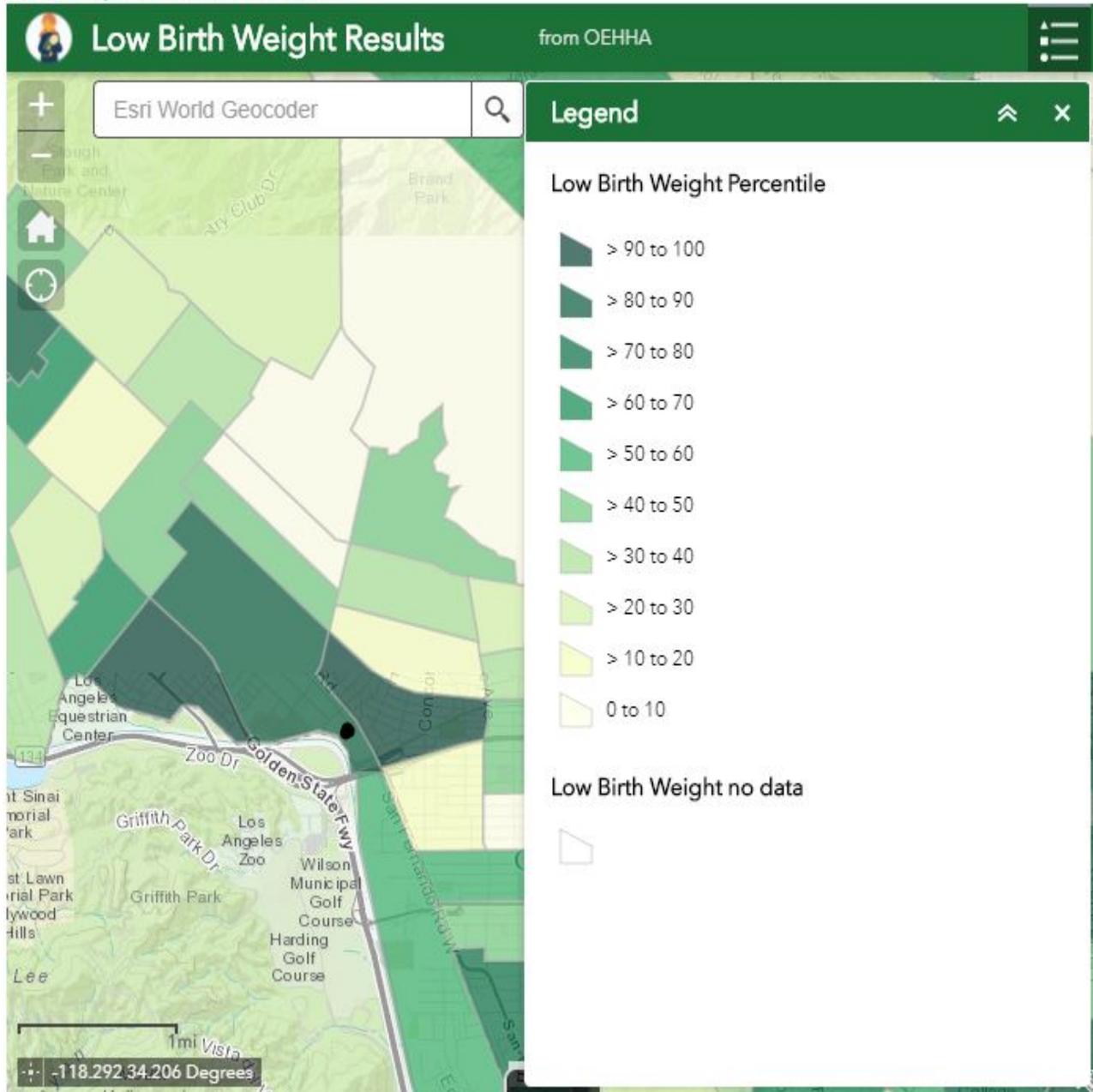
9 months of construction. That makes me think of babies. Did you know that the areas around Grayson have some of the lowest birth weight babies? The CDC says that one cause of low birth weight is "Exposure to air pollution".

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# CalEnviroScreen 3.0 Low Birth Weight Map

[Click to open in a new window](#)



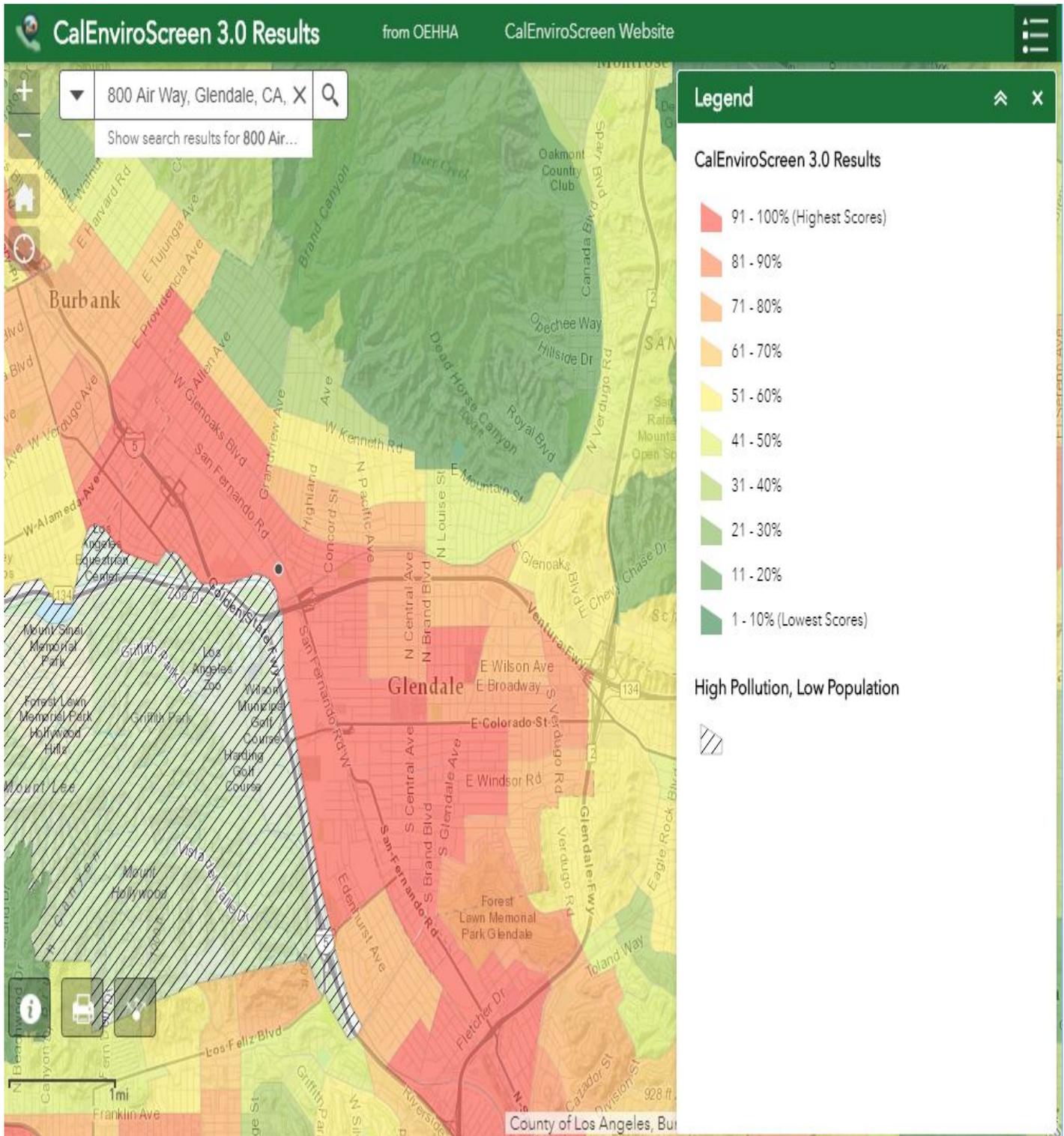
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The area around Grayson has some of the lowest birthrates.

Well, this is awkward. You weren't going to bring this up were you? The area around Grayson is considered by CalEPA to be an SB 535 Disadvantaged Community based upon a number of factors. Here are the maps and the criteria for designation. This means that the population around Grayson is the most vulnerable to pollution and are disproportionately burdened by multiple sources of pollution. The proposed plant will make the pollution worse on a population that is already struggling with the impacts of pollution. Also, look closely, a large part of Glendale is in



the worst of the worst for being disproportionately burdened by multiple sources of pollution. This is a once in a lifetime chance to clean up the air in Glendale. Don't let it pass us by!



Disadvantaged Community Designation map

Population:	2,849
CalEnviroScreen 3.0 Percentile:	91 - 95%
Pollution Burden Percentile:	99
Population Characteristics Percentile:	61
<u>Ozone:</u>	74
<u>PM 2.5:</u>	82
<u>Diesel:</u>	75
<u>Pesticides:</u>	0
<u>Toxic Releases:</u>	68
<u>Traffic:</u>	87
<u>Drinking Water:</u>	96
<u>Cleanups:</u>	89
<u>Groundwater Threats:</u>	80
<u>Hazardous Waste:</u>	86
<u>Impaired Water:</u>	63
<u>Solid Waste:</u>	79
<u>Asthma:</u>	28
<u>Low Birth Weight:</u>	100
<u>Cardiovascular Rate:</u>	45
<u>Education:</u>	59
<u>Linguistic Isolation:</u>	75
<u>Poverty:</u>	36
<u>Unemployment:</u>	40
<u>Housing Burden:</u>	73

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Information about age

This tract contains 8% Children under 10. The average in California census tracts is 13%. It also contains 18% Elderly over 65. The average in California census tracts is 12%.

Criteria for Disadvantaged Community Designation – scores out of 100 with 100 being the worst.

For more information on the Grayson Repowering Project, visit [www.Graysonrepowering.com](http://www.Graysonrepowering.com)

Go to [StopGrayson.com](http://StopGrayson.com) or [fb.com/StopGrayson](https://fb.com/StopGrayson) or join the [Glendale Environmental Coalition](#)

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I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

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Regards,

Burt Culver  
Glendale