

To: Mayor Eric Garcetti, Mayor Ara Najarian, Mayor Gabel-Luddy, the residents of the City of Los Angeles, the City of Glendale, the City of Burbank, and Millard County, Utah, and the workers of Intermountain Power Plant,

We, the undersigned individuals and organizations, have serious concerns with the plan to build a gas-fired power plant on the site of the Intermountain Power Plant. The current plan has irreconcilable issues with respect to carbon emissions, fiscal unsoundness, and an unacceptable impact on the economy of Millard County, Utah.

The plan to build a gas plant must be paused while alternatives are given serious consideration. In 2020, the National Renewable Energy Laboratory (NREL) is due to complete their 100% renewable study for Los Angeles, but we do not even need to wait until then to request RFPs to build the replacement as an all-renewable, all-storage project.

Climate Change Mitigation

The UN's Intergovernmental Panel on Climate Change (IPCC) report in 2018 found that, to avoid a catastrophic level of warming, worldwide carbon emissions must peak in 2020, be halved by 2030, and eliminated by 2050.¹ We should also be concerned that the IPCC report may be too optimistic², since the rate at which the climate has worsened has always outpaced predictions³.

We are currently living with early consequences of climate change. Wildfires are getting worse every year in California, particularly in Glendale⁴, one of the stakeholders in the IPP project. Extreme weather contributes to wildfires and hurricanes, and warming temperatures will eventually lead to widespread crop failure and economic breakdown⁵. The costs of inaction are too high to bear.

The IPCC's conclusion is that every level of government and society must deploy all the resources at its disposal to avert this catastrophe. It's clear what we need to do — the only question is whether or not we have the political will to accomplish it. Our coalition asserts we must find that will.

¹ https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf

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<https://blogs.scientificamerican.com/observations/scientists-have-been-underestimating-the-pace-of-climate-change/>

³ <https://www.scientificamerican.com/article/climate-science-predictions-prove-too-conservative/>

"Checking 20 years worth of projections shows that the Intergovernmental Panel on Climate Change has consistently underestimated the pace and impacts of global warming."

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<https://www.ocregister.com/2017/10/14/here-are-the-areas-with-the-highest-fire-hazard-potential-in-southern-california/>

⁵

<https://www.forbes.com/sites/drewhansen/2016/02/09/unless-it-changes-capitalism-will-starve-humanity-by-2050/>

The low hanging fruit — literally the least we can do — is **decline to build new fossil fuel infrastructure**. New fossil fuel infrastructure guarantees the use and maintenance of that infrastructure for decades to come, ensuring new greenhouse gas emissions at a time where we must be working to eliminate them. If we build new fossil fuel infrastructure as if the situation is business-as-usual, we will certainly fall short of the IPCC's targets, with disastrous consequences for people in Los Angeles, Utah, and across the globe.

Replacing the IPP Gas Plant with Renewables

It is widely understood by energy and grid experts that LADWP and the other IPP stakeholders have the technology and capital necessary to replace the base load generation of an 840 MW gas plant with renewables and storage.

A study by Synapse Energy Economics, Inc., commissioned by Food & Water Watch in 2018, found the IPP gas plant was unnecessary, and that Los Angeles had multiple different pathways to get to 100% renewable electricity by 2030 or sooner.⁶ This is especially noteworthy since this study was completed before SB100 passed. It also explained how repowering the three gas peaker plants at Scattergood, Harbor, and Haynes was unnecessary and fiscally unsound, an analysis with which the City of Los Angeles later agreed. The Synapse / Food & Water Watch study, which has already made one correct prediction, should be taken seriously with regard to the IPP.

NREL is performing its own study on behalf of the City of Los Angeles, with a goal of getting the City onto 100% net-renewable energy by 2030. Initial findings indicate that **“there are a broad set of pathways that could be pursued to achieve 100% renewable power system.”**⁷ The final study is due in 2020. It is premature to greenlight a new gas plant we probably won't need, while we're still waiting to read the full results of this study.

Circumstances have changed since the Intermountain Power Plant project was approved:

- The State of California has set a Renewable Portfolio Standard of **100% carbon-neutral electricity by 2045**.⁸ The gas plant at the Intermountain site was originally slated to operate through 2077⁹, but can no longer legally do so for 32 years of its intended

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https://www.foodandwaterwatch.org/sites/default/files/rpt_synapse-1803_clean_energy_for_los_angeles-web.pdf

⁷ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=225784>

⁸ https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100

⁹ <https://www.latimes.com/business/la-fi-utah-coal-los-angeles-climate-20190711-story.html>

lifecycle — more than half of the time the plant was intended to operate. This has serious implications for the fiscal health of the \$1.7 billion gas plant.¹⁰

- The County of Los Angeles recently passed its OurCounty Sustainability Plan, which lays out several goals relevant to the IPP project, including 3GW of new renewable energy sources by 2025 county-wide, not just in unincorporated LA County. The Plan also calls for **an end to fossil fuel use in the County by 2050**, 27 years before the intended lifecycle of the IPP gas plant is over. It will be much easier to hit ambitious goals in the Plan if this \$1.7 billion is spent on renewables instead of fossil fuels.¹¹
- The City of Los Angeles, one of the stakeholders in the IPP project, has declared a state of **Climate Emergency**.¹² No mere symbolic statement, the emergency declaration established a new Climate Emergency Mobilization Department, and the City declared that **combating climate change is “one of the most vitally important issues facing the City of Los Angeles”**.¹³
- The City of Los Angeles has also set goals of 80% renewable energy, and 3,000 megawatts of energy storage, by the mid-2030s¹⁴. These goals will be hard to hit while actively constructing a new gas plant at Intermountain.
- The City of Glendale, one of the stakeholders in the IPP project, has directed Glendale Water and Power to study pathways to achieve **100% renewable electricity by 2030**,¹⁵ a plan under which Glendale Water and Power will be unable to buy power from the gas plant at Intermountain in just 11 years — less than a quarter the total intended lifecycle of the gas plant. Again, this has serious implications for the fiscal health of the \$1.7 billion gas plant.
- The City of Glendale also recently went through a similar process with a peaker gas plant at Grayson. Initially, Glendale Water and Power believed it was simply not possible to provide the generating capacity of the plant with renewables. Community backlash prompted investigation of that claim. GWP’s followup study revealed that not only was it possible, **a plan with mostly renewables and storage was actually \$174,000,000 cheaper than the original all-gas plan**.¹⁶ This is not uncommon: utilities often use out-of-date models that overestimate the costs of renewables. Estimates that show renewables costing more than fossil fuels should be scrutinized and revisited.¹⁷
- As part of mass climate demonstrations worldwide on 9/20/19 featuring more than 4 million protestors in 150 countries, about ten thousand demonstrators took to the streets

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<https://www.latimes.com/opinion/story/2019-08-22/climate-dwp-coal-natural-gas-utah-renewable-energy-l-os-angeles>

¹¹ https://ourcountyla.org/wp-content/uploads/2019/07/OurCounty-Final-Plan_For-Web.pdf

¹² http://clkrep.lacity.org/online/docs/2018/18-0054_CAF_07-08-2019.pdf

¹³ http://clkrep.lacity.org/online/docs/2018/18-0054_mot_7-3-19.pdf

¹⁴ <https://www.latimes.com/environment/story/2019-09-10/ladwp-votes-on-eland-solar-contract>

¹⁵ http://glendale.granicus.com/MediaPlayer.php?view_id=12&clip_id=8211 Timestamp: 3:30:00

¹⁶ http://glendale.granicus.com/MediaPlayer.php?view_id=12&clip_id=8211 Timestamp: 0:35:00

¹⁷

<https://pv-magazine-usa.com/2019/09/09/states-could-save-consumers-billions-with-solar-by-requiring-transparent-utility-modeling/>

in Los Angeles¹⁸, with more than a thousand¹⁹ rallying²⁰ in Utah²¹. Public opinion has turned sharply in favor of bold climate action.

- A 300 MW solar plant is currently planned for a site just 1 mile away from Intermountain, suggesting that the local solar potential, workforce, and transmission infrastructure are capable of handling renewable projects at this scale.^{22 23}
- SB100 compliance will require, by one estimate, 150GW of new solar generation in California.²⁴ This is an extremely high bar, and requires an all-hands-on-deck approach to new renewables construction.
- The City of Burbank, which has set a non-binding goal of 100% renewable energy by 2040, has begun rapidly scaling down its reliance on fossil fuels generated at Intermountain.²⁵
- A compressed air energy storage system on the IPP site was considered as a possible replacement for the base load generation of fossil fuels, but this all-renewable option was abandoned. It was abandoned not for technical reasons, but because of what Burbank Water and Power describes as “ambivalence” from LADWP.²⁶ The same “ambivalence” prevented the stakeholders from moving forward with an all-renewable plan at Wyoming Wind. Burbank would have preferred an all-renewable plan, but lacked the negotiating leverage to ensure it was built. **Burbank Water and Power said in a report, “As a gas-fired facility, BWP’s modeling suggested that the facility would be uneconomic prior to the end of its operational life.”** Burbank would have dropped out of the project altogether, but they noted that “[Greenhouse gas emissions] from the Gas Repowering would likely not be reduced because LADWP would assume BWP’s share.” LADWP unilaterally chose not to give renewables serious consideration.
- Citing concerns about SB100 compliance, the cities of Anaheim, Pasadena, and Riverside have opted not to participate as stakeholders in the gas plant at Intermountain.

In addition to the unacceptable risks to the climate, it is irresponsible and reckless to go forward with a gas plant that is fiscally unsound.

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<https://losangeles.cbslocal.com/video/4170791-thousands-of-youth-demand-action-on-climate-change-in-downtown-la/>

¹⁹

<https://www.deseret.com/utah/2019/9/20/20876460/call-for-zero-emissions-zero-waste-and-zero-regrets-climate-change-rally-in-salt-lake-city>

²⁰ <https://www.sltrib.com/news/environment/2019/09/20/utah-students-join-global/>

²¹ <https://www.facebook.com/events/utah-state-capitol/global-climate-strike-slc/632235573954952/>

²² <http://www.ecgutahsolar1.com/>

²³

<https://www.transmissionhub.com/articles/2013/09/ecg-plans-300-mw-utah-solar-project-next-to-doomed-coal-plant.html>

²⁴

<https://www.utilitydive.com/news/hollywoods-next-star-could-be-virtual-power-plants-as-ladwp-closes-out-nat/560792/>

²⁵ https://burbank.granicus.com/MetaViewer.php?view_id=2&clip_id=8741&meta_id=356112

²⁶ https://burbank.granicus.com/MetaViewer.php?view_id=2&clip_id=8741&meta_id=356112

A Just Transition for Workers & the Community

We are not content to simply replace the gas plant with renewables. There is also an urgent need to improve the plan's treatment of the workers and community at Intermountain.

The residents of Millard County, Utah, currently benefit from about 400 jobs, with an average salary of \$94,000, that the coal plant at Intermountain provides. At its peak, the facility provided 485 jobs. In a county with only 12,863 residents, that makes the coal plant a vital component of the local economy and tax base. The gas plant planned to replace the coal plant will only provide 125 jobs, leaving the residents of Millard County feeling powerless.²⁷

It's not right that Los Angeles is exporting its air pollution into other communities. It also wouldn't be right to make a unilateral decision that wipes out the economy of an entire county. Los Angeles must be a better neighbor.

Therefore, we demand that the plan to replace the coal plant do more to guarantee a Just Transition to all the current workers who have jobs at Intermountain Power Plant. The Stakeholders of Intermountain Power Plant must begin negotiating in good faith with local labor, starting with an offer including at least the following conditions:

- **Engagement with local workers**, including IBEW Local 1619, in crafting the final plan for Intermountain before it is put into motion, particularly to expand and improve upon worker protections, not limited to the starting points below.
- **At least 840MW of renewable generation and storage components of the new plan must be sited on the current location of Intermountain Power Plant**, or preferably more, to provide as many jobs as possible to the local community. This >840MW should be *in addition to* the separate 300MW solar project already planned for a site near Intermountain.
- **A guaranteed job offer** from LADWP for former coal plant employees, with as many of these jobs on-site at IPP as possible. These job offers must match or exceed the worker's salary at IPP, and be adjusted for cost of living if they would require relocation.
- **Fully paid-for job retraining programs** to all current IPP workers who opt into them.
- **An annual dividend paid to all residents of Millard County**, regardless of employment, age, or citizenship status, throughout the duration of the project.

The rationale for the dividend is simple: the all-renewables plan is likely to be cheaper than the gas plant. That money should be shared with the community and people impacted by the change. Based on the incredibly popular Alaskan Oil Dividend²⁸, the dividend is also likely to

²⁷ <https://www.latimes.com/business/la-fi-utah-coal-los-angeles-climate-20190711-story.html>

²⁸

<https://qz.com/1018413/new-survey-by-the-economic-security-project-finds-alaska-residents-strongly-sup>

greatly endear the residents to the project. Sharing the benefits of green technology is how we will build popular support for it.

The expenses of these Just Transition components will be modest compared to the \$1.7 billion price tag of the planned gas plant - a figure that doesn't even include annual operating costs. Even if people moved to Millard County just to claim the dividend, these expenses would not be more than a rounding error by comparison. Our coalition believes an all-renewable plan with these Just Transition components is still likely to be cheaper than the planned gas plant.

Conclusion

We, the undersigned organizations and individuals, assert:

- The planned gas plant on the site of the IPP cannot be safely operated if we are to avoid the catastrophic consequences of climate change,
- The planned gas plant on the site of the IPP does not adequately support the workers or residents of Millard County,
- The planned gas plant on the site of the IPP is fiscally unsound, and
- **The City of Los Angeles and the other IPP stakeholders must halt plans to construct this gas plant, and request all-renewable RFIs now.**
- A new, all-renewable and storage plan to replace the IPP should be crafted by the stakeholders and by laborers that addresses the above concerns.

SIGNED:

Organizations & public officials: to sign this letter, please [use this form](#) or email tom.r.pike@gmail.com!

Civilians & residents of LA & Utah: sign the [petition version of this letter here](#).

Civic Institutions

Los Angeles Neighborhood Council Sustainability Alliance Advocacy Committee
Coastal San Pedro Neighborhood Council
Boyle Heights Neighborhood Council
Central Hollywood Neighborhood Council
Del Rey Neighborhood Council
Eagle Rock Neighborhood Council
Los Feliz Neighborhood Council
Mar Vista Community Council

[port-preserving-a-universal-basic-income-ubi-from-the-alaska-permanent-fund-dividend-rather-than-cut-taxes/](#)

North Hollywood Neighborhood Council
Olympic Park Neighborhood Council
Silver Lake Neighborhood Council
Wilshire Center Koreatown Neighborhood Council

Organizations

Bear River Sunrise
Canyon Country Rising Tide
Center for Biological Diversity
East Valley Indivisibles
Elders Rising
Extinction Rebellion, Los Angeles
Extinction Rebellion, Salt Lake City
Food and Water Action
Glendale Environmental Coalition
Healthy Environment Alliance of Utah
Indivisible CA-33
Indivisible California Green Team
Indivisible Santa Barbara
Indivisible Ventura
Living Rivers
Los Angeles DSA
The Resistance - Northridge, Indivisible
Salt Lake City DSA
Save Our Canyons
SoCal 350 Climate Action
Southern Utah Wilderness Alliance
Sunrise Movement of Los Angeles
Sunrise Movement of Salt Lake City
Utah Physicians for a Healthy Environment
Utah Tar Sands Resistance
Wasatch Rising Tide

Community Leaders

Ardashes Kassakhian, Glendale City Clerk & Candidate for Glendale City Council
Aura Vasquez, former Commissioner, Los Angeles Department of Water & Power
Cherise Udell, Executive Director, Utah Moms for Clean Air
CJ Berina, Delegate, California Democratic Party, AD45
Colleen Toumayan, Delegate, California Democratic Party, AD46
Dan Brotman, Economics Professor at Glendale College
Jamie Tijerina, Delegate, California Democratic Party, AD51
Marcy Miroff Rothenberg, Delegate, California Democratic Party, AD38
Matlock Grossman, Member, Los Angeles Mayor's Youth Council on Climate Action

Nia Smith, Member, Los Angeles Mayor's Youth Council on Climate Action
Nithya Raman, Candidate for LA City Council, District 4

NOTE TO FUTURE SIGNATORIES:

Since this letter was first written, LADWP has revised their plan from an 840MW natural gas-fired plant to an 840MW plant that is powered 70% by natural gas and 30% by hydrogen.

The hydrogen is to be generated by electrolysis at a massive scale. That would make this facility one of the first of its kind in the world.

Electrolysis is a process by which water is converted into hydrogen. When the hydrogen is burned again, it is converted back into water. Since no net energy is gained from the process, it is best seen as a form of energy storage, not energy generation.

The energy needed to electrolyze hydrogen is planned to come from on-site solar facilities and a large wind farm in Wyoming. This is good, because if the hydrogen were generated by burning natural gas, it would be no better than simply burning the gas directly. (In fact, it would be a little worse.) Likewise, it would not be sustainable to generate the hydrogen directly from natural gas itself, which is how all utility-scale hydrogen generation has been done in the past. But electrolyzing hydrogen from water using renewable energy sources, and then burning it when the sun isn't shining or the wind isn't blowing, is a great way of effectively using solar and wind power throughout the year.

In short: there are a lot of bad ways to generate hydrogen, but this plan seems to be genuinely sustainable. Furthermore, a hydrogen facility operates very much like a fossil fuel facility, meaning job skills transfer more easily for the workforce than they do for other forms of energy storage jobs.

However. The new plan, while an improvement over the all-natural-gas plan, is still 70% natural gas. LADWP does not intend to remove natural gas from the facility entirely until 2045. There is nothing special about that date from a technological perspective. It's simply the date at which they're required to operate the facility sustainably according to state law.

So, since the only thing motivating the 2045 date is a political deadline, would requiring them to get there faster work? What if we told them it had to be 100% green hydrogen by Day 1, when the facility opens in 2025? Surely that's too much to hope for, right?

Not so fast. Some of LADWP's vendors have stated that they believe the facility can operate using 100% green hydrogen from Day 1 in 2025.

So why aren't they going for it? In their own words, it's "difficult" and "they don't want to be first". But with a site they describe as uniquely suited to hydrogen, and massive amounts of funding, I'm not sure who they think will blaze the trail if they don't. We need this facility to be green hydrogen. We cannot wait for someone else.

We need to keep the pressure on them. To that end, even though the plan has changed somewhat, please continue to get new signatories for this letter. The fundamental demand - **no natural gas at Intermountain** - is still applicable, and signatories are still welcome.

For that reason, and because there are already dozens of signatories, we are not changing the text of this letter. Just adding this note to the end as a postscript.

Thanks for signing!

-Tom Pike

Los Feliz Neighborhood Council Environmental Affairs Committee