

PAUL F. BROWNING, PhD

Executive Chairman, Argon Power Group

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Via Electronic Mail

Los Angeles City Council
Attn: Michael Espinosa
200 N. Spring Street
Los Angeles, CA 90012
michael.espinosa@lacity.org

Los Angeles Department of Water and Power
Corporate Environmental Affairs, Environmental Planning and Assessment
Attn: Jazmin Martin
111 N. Hope Street, Room 1044
Los Angeles, CA 90012
Scattergood_CEQA@ladwp.com

RE: Response to Supplemental Public Comments of July 28, 2026 — Scattergood Final Environmental Impact Report (SCH No. 2023050366) | Board of Water and Power Commissioners Resolution No. 026071 | Council File No. 25-1360

To the Los Angeles City Council and the Los Angeles Department of Water and Power:

I write in response to the supplemental comment letter submitted on July 28, 2026 by Communities for a Better Environment and its co-appellants, and to the report attached to that letter, *Hydrogen: Not a Solution for Gas-Fired Turbines*, authored by Dennis Wamsted of the Institute for Energy Economics and Financial Analysis ("IEEFA").

I am the Executive Chairman of Argon Power Group. I previously served as President and Chief Executive Officer of GE's Thermal Products business and as President and Chief Executive Officer of Mitsubishi Power Americas. In those roles I was responsible for the engineering, manufacture and commercial deployment of the class of gas turbine technology at issue in this proceeding, including the machines the IEEFA report discusses by name. I have a commercial interest in the growth of the green hydrogen and power generation industries and offer these comments in that light. My purpose is not to advocate for any particular procurement outcome, but to correct a factual record that has been overtaken by events.

The appellants describe the attached report as "crystal clear." It is clearly written. It is also dated August 2024. In the twenty-three months since it was published, the one project the report itself identified as hydrogen's most credible application in the power sector has been financed, built, commissioned and placed in commercial service — and the largest single purchaser of its output is the City of Los Angeles.

1. The report's own leading example is now an operating asset, and Los Angeles is its largest customer.

The IEEFA report devotes its closing analytical section to a single case study: the Intermountain Power Project in Delta, Utah, and the co-located Advanced Clean Energy Storage ("ACES Delta") hydrogen production and storage hub.¹ The report treats the project as unproven and expresses doubt that it will produce enough hydrogen to reach its blending target, let alone store any. Its Appendix A lists the project simply as "Under construction."² Those characterizations were accurate in August 2024. They are not accurate today.

- **The plant is running.** The 840 MW IPP Renewed combined-cycle facility — two Mitsubishi Power M501JAC gas turbines, designed for 30% hydrogen by volume at start-up and a path to 100% — entered commercial operation in 2025.³ LADWP has confirmed that it began taking energy from the new units in 2025 and that Los Angeles no longer takes coal-fueled energy from IPP.⁴
- **The hydrogen plant is built and has run at full load.** All forty electrolyzer units comprising the 220 MW ACES Delta alkaline electrolysis facility have been installed and commissioned, and the equipment supplier confirmed in early 2026 that all forty had operated at 100% load.⁵
- **The storage works, and the report's specific prediction has been falsified.** As reported in December 2025, ACES Delta produced green hydrogen and injected it into an underground salt cavern, completing the full production-to-storage cycle for the first time.⁶ The IEEFA report had predicted that "so little if any of the hydrogen will be stored" that the project's long-duration storage claim would be undercut.⁷ Two caverns of roughly 150 GWh each are now in service.
- **Blending is the remaining commissioning step, and I will state its status plainly.** Hydrogen blending and injection at IPP Renewed were scheduled to begin in the second quarter of 2026.⁸ I am not aware of a public announcement confirming that blending has commenced; the electrolyzer

¹IEEFA, *Hydrogen: Not a Solution for Gas-Fired Turbines* (Aug. 2024), at 23–24 ("Hydrogen and Long-Duration Storage — A Possible Application: The ACES Project") (the "IEEFA Report").

²IEEFA Report, Appendix A, Table A-1, at 26 (listing "Intermountain / LADWP / UT / 840 [MW] / CCGT / Mitsubishi M501JAC / 30 [% initial blend] / \$1,000 [M] / 2025 / Under construction").

³Intermountain Power Agency, *IPP Renewed* (840 MW net output; 30% hydrogen at start-up transitioning to 100% hydrogen; commercial operation of the new units stated as beginning July 2025). <https://www.ipautah.com/ipp-renewed/> Contemporaneous reporting indicates the first new unit entered commercial operation in October 2025 and the second in December 2025. Utah News Dispatch, *IPP coal-fired units are no longer operating* (Dec. 5, 2025). <https://utahnewsdispatch.com/2025/12/05/intermountain-power-plant-coal-fired-units-no-longer-operating/>

⁴Los Angeles Department of Water and Power, *Intermountain Power Project* ("In 2025, LADWP began utilizing energy from IPP's newly constructed units"; "Los Angeles no longer utilizes coal-fueled energy from IPP"; green hydrogen blending to begin in 2026). <https://www.ladwp.com/strategic-initiatives/clean-energy-future/intermountain-power-project>

⁵Decarbonfuse, *ACES Delta Hits 220MW Milestone in Utah* (Mar. 3, 2026) (all 40 electrolyzer units of the 220 MW first stage installed and commissioned; HydrogenPro confirming "all 40 units have already operated at 100% load"; two salt caverns of up to 150 GWh each). <https://decarbonfuse.com/posts/aces-delta-hits-220mw-milestone-in-utah>

⁶Energy Intelligence, *Chevron Project Produces, Stores First Hydrogen in Utah* (Dec. 8, 2025) (ACES Delta "produced green hydrogen and successfully injected it into an underground salt cavern, successfully completing the full production-to-storage cycle for the first time"). <https://www.energyintel.com/0000019a-ff37-d2c7-a3db-ff3f80770000>

⁷IEEFA Report, at 24 ("So little if any of the hydrogen will be stored, undercutting the project's touted long-term/seasonal storage capability.").

⁸Turbomachinery International, *Utah Hydrogen Project Links Storage, Gas Turbines, and Transmission* (two Mitsubishi Power M501JAC units in commercial operation; hydrogen blending and injection planned to begin Q2 2026). <https://www.turbomachinerymag.com/view/utah-hydrogen-project-links-storage-gas-turbines-and-transmission>

supplier reported in June 2026 that final startup completion is anticipated in the second half of 2026.⁹ I note that candidly because it is the honest state of the record, and because it does not weaken the point. The electrolysis plant, the caverns and the turbines are all built and have all run. What remains at Delta is commissioning sequence, not invention.

This matters to the appeal for a straightforward reason. The Council is being asked to reject an Environmental Impact Report on the strength of a report whose central empirical case study has, in the interval, become a working power plant supplied by a working green hydrogen facility. A conclusion drawn in 2024 about what could not be done does not survive the demonstration, in 2025 and 2026, that it was done.

The appellants press four questions drawn from the IEEFA report: What will a dedicated pipeline cost, can it be permitted, and how long will it take to build? What company will produce the hydrogen? Will it be carbon-free? And how do the costs compare to zero-carbon alternatives? They then assert that "any feasible answer has become much less clear."

Let's be clear, LADWP did exactly what they said they would do in Delta, UT to reconstruct a power plant critical to Los Angeles using cleaner fuels:

- **Who will produce the hydrogen?** ACES Delta, a joint venture of Mitsubishi Power Americas and Chevron New Energies, from a 220 MW electrolysis facility that is built, commissioned and proven at full load. A condition precedent to the development of this project was IPP's offer of a long-term hydrogen offtake agreement.
- **Will it be carbon-free?** Yes. ACES Delta uses renewable-powered alkaline electrolysis — green hydrogen, not steam-methane-reformed hydrogen.
- **What will the dedicated pipeline cost, and can it be permitted?** There is a short dedicated pipeline in Delta, because production, storage and combustion are co-located at the point of use.
- **Where is the storage?** In two salt caverns adjacent to the plant, holding hydrogen today.

The success of the IPP and ACES Delta projects should give the Council *more* confidence in this record, not less.

And, in the case of Scattergood, the appellants are asking one question that is unanswerable at this time. Whereas Delta, UT was a self-contained project, hydrogen supply in the LA basin is part of a much larger Southern California hydrogen strategy that involves multiple sectors. What we do know is that when final, unappealable approval of a 346 MW Scattergood power plant is achieved, offering a long-term offtake agreement for 30% hydrogen, this will create exactly the cornerstone load that is needed for project developers to answer that question.

2. The pipeline objection has also been falsified by real pipeline project completions.

The IEEFA report's infrastructure argument rests on the premise that hydrogen pipelines are impractical. It reads: "If blending is not a viable option, that leaves just one alternative—dedicated hydrogen transportation either by converting existing methane pipelines to distribute hydrogen or building entirely new hydrogen

⁹HydrogenPro ASA, *Business Update* (June 22, 2026) (the 220 MW first stage is "completed and commissioned"; final startup completion anticipated in the second half of 2026). https://hydrogenpro.com/mfn_news/business-update/

infrastructure. Both options have serious drawbacks.” Here too, the report’s objections have been overtaken by real project outcomes since its publication.

The report’s pipeline chapter quotes Michael Liebreich for the proposition that “it is hard to see any [hydrogen pipelines] commissioned this side of 2030.”¹⁰ In December 2025 — more than four years ahead of that estimate — GASCADE completed the conversion of approximately 400 kilometers of existing natural gas pipeline into hydrogen service in Germany, forming a corridor from the Baltic coast to Saxony-Anhalt, with the initial sections filled and in operation.¹¹ That corridor is the first tranche of an approved 9,040 kilometer German hydrogen core network, roughly 60% of which is converted existing pipe and the remainder newly built hydrogen pipeline, budgeted at €18.9 billion and targeted for completion in 2032.¹² Repurposing steel at scale is no longer a thought experiment. It is a construction program with hundreds of kilometers already in hydrogen service.

3. Projects like Scattergood are how green hydrogen supply gets built — and California has just made that demand bankable.

The appellants’ supplemental letter argues that recent federal developments — the acceleration of the section 45V clean hydrogen production credit, which under H.R. 1 becomes unavailable to facilities beginning construction after December 31, 2027, and the termination of roughly \$1.2 billion in federal ARCHES hub funding — make the Scattergood fuel supply less certain. Those are genuine headwinds on the supply side. But the conclusion the appellants draw from them is the opposite of the one the economics support.

No developer finances an electrolyzer fleet, a salt cavern, or a hydrogen pipeline on speculation. These are capital-intensive assets with twenty- to thirty-year lives, and they are financed against creditworthy, long-dated offtake. A large municipal utility committing to take a minimum 30% hydrogen blend by volume at a 346 MW facility from day one¹³ is exactly the kind of anchor demand that makes green hydrogen production and delivery projects financeable in Southern California. Cancelling that commitment does not accelerate hydrogen supply. It removes the demand signal that would have justified building it — and it does so at the precise moment when federal support is thinning and the demand signal matters most.

California has just acted on exactly this logic. On June 29, 2026, Governor Newsom signed Senate Bill 1350 (McNerney), which qualifies electricity generated from green hydrogen in turbines as an eligible renewable resource under California’s Renewables Portfolio Standard. Eligibility turns on hydrogen

¹⁰IEEFA Report, at 17–18 (quoting Michael Liebreich: “Most hydrogen pipelines will be purpose-built, and it is hard to see any commissioned this side of 2030”).

¹¹GASCADE, *GASCADE Commissioning 400-Kilometer Hydrogen Core Grid* (Dec. 2025) (approximately 400 km of converted natural gas pipeline forming a Baltic-to-Saxony-Anhalt hydrogen corridor, with initial sections filled and in service). <https://hydrogen-germany.de/en/news/gascade-commissioning-400-kilometer-hydrogen-core-grid/>

¹²German Federal Ministry for Economic Affairs and Energy, *FAQ – Hydrogen Core Network* (9,040 km network approved Oct. 22, 2024; approximately 60% converted existing pipeline; €18.9 billion; completion targeted 2032). <https://www.bundeswirtschaftsministerium.de/Redaktion/EN/FAQ/Hydrogen-Core-Network/faq-hydrogen-core-network.html>

¹³LADWP, *Scattergood Generating Station Units 1 and 2 Green Hydrogen-Ready Modernization Project* (346 MW combined-cycle replacement for legacy steam-boiler Units 1 and 2, which date to the 1950s; minimum 30% hydrogen by volume; estimated \$800 million; in-service target Dec. 30, 2029). The Board of Water and Power Commissioners certified the Final EIR on October 28, 2025; certification was announced November 4, 2025. See CEQAnet, SCH No. 2023050366, Notice of Determination. <https://www.ladwp.com/community/construction-projects/west-la/scattergood-generating-station-units-1-and-2-green-hydrogen-ready-modernization-project>

produced from state-certified renewable sources, on the facility's turbine being capable of using a hydrogen blend at a percentage set by the Energy Commission that may not be set below 20% by volume, and on a showing that hydrogen use produces a net decrease in locally regulated air pollutants and in electric-sector greenhouse gases.¹⁴ The bill passed both houses unanimously and was co-sponsored by the Green Hydrogen Coalition and the State Building and Construction Trades Council; the California Municipal Utilities Association supported it.¹⁵

The significance for this appeal is direct. Scattergood's minimum 30% hydrogen requirement clears SB 1350's 20% statutory floor with margin. The Legislature and the Governor have just created, by unanimous vote, a state-level revenue and compliance value stream for precisely the configuration LADWP has proposed — a green-hydrogen-fired turbine — for precisely the purpose of inducing developers to build the production and delivery infrastructure the appellants say does not exist. Rejecting this EIR would put the City of Los Angeles at odds with a clean energy policy the State adopted four weeks ago without a dissenting vote.

4. The turbine technology record has moved substantially since August 2024.

The IEEFA report's technology discussion is anchored on demonstrations from 2022: a 5% blend at Long Ridge, a 20% blend at Plant McDonough, and a 44% blend on a 45 MW aeroderivative unit at Brentwood. On that basis it concludes that high-hydrogen operation of advanced-class machines remains speculative. Three developments since publication bear on that conclusion.

- **50% hydrogen on an advanced-class machine, in the field.** In May and June 2025, Georgia Power and Mitsubishi Power completed hydrogen blend testing at 50% by volume on an M501GAC gas turbine of approximately 283 MW at Plant McDonough-Atkinson — the same plant the IEEFA report cites for the proposition that 20% was the practical ceiling. The parties describe it as the first validation of 50% hydrogen blending on an advanced-class gas turbine and the largest test of its kind in the world to date. It achieved an approximately 22% reduction in CO₂ emissions relative to natural gas.¹⁶ This was not a laboratory rig. It was a production machine in a commercial fleet at a station of roughly 2,500 MW.
- **100% hydrogen capability, independently certified.** In June 2026, RINA granted type approval to the Baker Hughes NovaLT™16 gas turbine — in a marine propulsion application — for operation

¹⁴Senate Bill 1350 (McNerney), Ch. 35, Stats. 2026, approved by the Governor June 29, 2026 (announced July 1, 2026). See Office of Sen. Jerry McNerney, *Gov. Newsom Signs Bay Area Senator's Bill to Expand California's Use of Hydrogen Energy* (green hydrogen electricity qualifies as an eligible renewable resource under the RPS subject to certification conditions). The statute requires that the facility's turbine be capable of using a hydrogen blend at a percentage established by the Energy Commission, which may not be set below 20% by volume, and requires a showing of a net decrease in locally regulated air pollutants and in electric-sector greenhouse gases. Senate and Assembly votes were 39–0 and 74–0. <https://sd05.senate.ca.gov/news/gov-newsom-signs-bay-area-senators-bill-expand-californias-use-hydrogen-energy>

¹⁵American Public Power Association, *California Governor Signs Green Hydrogen Bill Supported by CMUA Into Law*. <https://www.publicpower.org/periodical/article/california-governor-signs-green-hydrogen-bill-supported-cmua-law>

¹⁶Georgia Power, *50% hydrogen blend testing successfully completed at Georgia Power's Plant McDonough-Atkinson* (June 2025) (testing conducted in May and June 2025 on an M501GAC unit of approximately 283 MW; approximately 22% CO₂ reduction versus 100% natural gas; described by the parties as the first validation of 50% hydrogen blending on an advanced-class gas turbine and "the largest test of this kind in the world to date"). The demonstrated blend was 50.2% hydrogen by volume in wet combustion mode; dry-combustion operation was demonstrated at 30%. Georgia Power states the station's nameplate capacity as 2,520 MW. <https://www.georgiapower.com/news-hub/press-releases/50-percent-hydrogen-blend-testing-successfully-completed-at-georgia-powers-plant-mcdonough-atkinson.html>

on natural gas and up to 100% hydrogen.¹⁷ Baker Hughes states that the machine can start up and burn 100% hydrogen without hardware modification and without pilot fuel.¹⁸ The European Union's HyPowerGT program is carrying dry-low-emission 100% hydrogen combustion on that platform from TRL5 validation to full-scale TRL7 demonstration on a 16.9 MWe unit.¹⁹ The NovaLT™16 is a smaller machine than the units contemplated at Scattergood, and I do not suggest otherwise. The point is narrower and more important: low-emissions combustion of 100% hydrogen in a gas turbine is now a certified, commercially available capability, not an open research question. Scaling a proven combustion architecture across frame sizes is ordinary turbine engineering.

- **The blending-efficiency argument proves less than it appears to.** The report's Figure ES-1 correctly shows that volumetric hydrogen blending yields disproportionately small CO₂ reductions at low blend levels. That arithmetic is not in dispute, and it is the reason no serious party proposes 5% blending as a decarbonization strategy. It is also the reason the Scattergood project specifies a minimum of 30% on day one and a path to 100%, and the reason SB 1350 sets its eligibility floor at 20%. The report's own chart shows meaningful reductions emerging in the 50–80% band — and the McDonough-Atkinson result establishes that the 50% point on that curve is now demonstrated hardware.

5. What the report gets right, and why that does not support granting the appeal.

I agree with one of the report's core observations. Some power projects have used the "hydrogen-ready" label loosely. Regulators should be skeptical of that label, and the report is right that utilities should be required to account for their fuel sourcing before the label is credited. SB 1350 goes further than disclosure — it conditions RPS eligibility on hydrogen certified as renewable by the State. I would go further still. Disclosure alone is a weak test. A project that markets itself as hydrogen-fueled should be held to a binding minimum hydrogen requirement when it enters commercial operation. Scattergood meets that test at 30%, comfortably above the 20% floor below which SB 1350 does not permit the Energy Commission to set the qualifying blend.

But those are arguments for conditions and disclosure, not for decertifying an EIR. And they land differently here than they would against a merchant developer in a competitive market. The report's sharpest critique — set out in its own recommendations and echoed in the appellants' first footnote — is that shareholders, not ratepayers, should bear the cost of unproven hydrogen adaptability. LADWP has no shareholders. It also, unlike every utility the report criticizes, is not making an untested promise: it is the anchor offtaker and operator of the only integrated green hydrogen production, storage and advanced-class-turbine complex operating in the United States.

¹⁷Baker Hughes, *Baker Hughes' fuel flexible NovaLT™ 16 Gas Turbine Certified by RINA for Marine Propulsion* (June 4, 2026) (type approval for marine propulsion applications, to operate on natural gas and up to 100% hydrogen). <https://www.bakerhughes.com/company/news/baker-hughes-fuel-flexible-novalttm-16-gas-turbine-certified-rina-marine-propulsion>

¹⁸Baker Hughes, *NovaLT™16 Gas Turbine* ("NovaLT™16 gas turbines can start up and burn 100% hydrogen without hardware modification and without pilot fuel"). <https://www.bakerhughes.com/gas-turbines/novalt-technology/novalt16>

¹⁹European Commission, CORDIS, *HyPowerGT — Demonstrating a hydrogen-powered gas-turbine engine fuelled with up to 100% H₂* (Grant No. 101136656) (dry-low-emission hydrogen combustion validated at TRL5 on a 13 MWe NovaLT12; full demonstration at TRL7 planned on a 16.9 MWe NovaLT16; project period Jan. 2024–Dec. 2027). <https://cordis.europa.eu/project/id/101136656>

The distinction the report draws is between projects that are genuinely hydrogen-fueled and projects that use hydrogen as marketing cover for conventional gas. That is the right distinction. Scattergood falls on the right side of it: a minimum 30% hydrogen requirement from first fire, a path to 100%, a sponsor holding 48.617% of an operating plant²⁰ with an integrated, commissioned green hydrogen supply behind it, and a newly enacted state statute that rewards exactly this configuration.

Conclusion

The appellants' supporting evidence is a report written in August 2024 whose central case study has since been built and placed in service by the applicant utility itself, whose pipeline timeline has been beaten by four years, whose turbine technology ceiling has been exceeded by 30 percentage points, and whose specific prediction about hydrogen storage at Delta, Utah has been disproved.

I respectfully urge the Council to deny the appeal and affirm certification of the Final Environmental Impact Report.

Thank you for your consideration. I am available to discuss any of the technical matters above with Council staff or with the Department.

Respectfully submitted,



Paul F. Browning, PhD

Executive Chairman, Argon Power Group
Former President and CEO, GE Thermal Products
Former President and CEO, Mitsubishi Power Americas

²⁰Intermountain Power Agency, *Participants & Service Area* (LADWP Generation Entitlement Share: 48.617%, the largest single share; California purchasers in aggregate: 78.943%). Entitlement shares are stated against the original project rating.
<https://www.ipautah.com/participants-services-area/>