

Subject: DTE-led group accused of misleading public on natural gas – Planet Detroit
Attachments: Comment-SouthtownAgreementAmendment.pdf

From: Rita Mitchell
Sent: Tuesday, May 7, 2024 11:52 AM
To: Planning <Planning@a2gov.org>
Subject: Re: DTE-led group accused of misleading public on natural gas – Planet Detroit

Dear Planning Commissioners,

Please review the attached document, with my comments on the amendments to the Southtown Development Agreement that you will consider today. From my non-technical assessment, the outcome of the agreement will be establishment of a business as usual connection with DTE methane gas to support the development.

The agreement is complicated, and relies on methods that are either unproven or difficult to implement, hence the likely default to DTE methane. Additionally, the monitoring required seems of an intensity that is beyond the management scope for the city for a single development. I hope that you will consider these comments as you discuss the proposal. I don't see how it will improve carbon emissions prior to 2030. I will look for your analysis.

Thank you,

Rita Mitchell
Chair, Environmental Commission
Writing for myself

> On May 3, 2024, at 9:32 AM, Rita Mitchell <ritalmitchell@gmail.com> wrote:

>

> Dear planning Commissioners,

>

> Your May 7 agenda includes a request to amend the agreement with the Southtown

> Development that will allow the installation of highly questionable technology for energy generation. I am

forwarding this article for your information and ask that you take the risk of gas leaks and unproven carbon capture in your decision to amend the agreement.

>

> <https://planetdetroit.org/2024/05/natural-gas-dte-american-gas-association/>

>

> Thank you,

>

> Rita Mitchell

> Chair, Environmental Commission, writing for myself

Comment on Southtown Amendment to Agreement, 5/6/24

Amendment Section	Question/Observation/Reference
(P-21) For Period 1, the DEVELOPER will power and operate its fuel cells first with	
a) gas (RNG) produced specifically from agricultural emissions or via	Agricultural emissions are methane, no change from fossil methane in terms of Greenhouse Gas (GHG) warming. Methane is environmentally harmful. Agricultural emissions are collected from factory farms, and perpetuate inhumane treatment of animals as well as harmful runoff that pollutes air, water, and land.
b) biodigestion, if commercially available, or with	“if commercially available”, from what source, and when?
c) RNG commercially available through DTE if not, and second using	This is business as usual with DTE fossil methane gas lines.
d) carbon capture technology as soon as it is available, with end-use of CO2 either permanent sequestration or	Please read the attached article. “...despite this long history, CCS doesn’t have a strong track record of actually sequestering carbon — especially for the power sector, where 90 percent of proposed carbon capture capacity has failed or never gotten off the ground.” https://grist.org/energy/is-carbon-capture-viable-in-a-new-rule-the-epa-is-asking-power-plants-to-prove-it/
e) as offtake in the food-grade CO2 market.	Does this mean selling CO2 (if captured) for fizzy water, for example? There appear to be agricultural gas links. I hesitate to support this. https://www.ieabioenergy.com/wp-content/uploads/2020/11/Case-Story-CO2-recovery-Denmark-November-2020.pdf
(P-22) For Period 2, the DEVELOPER will power and operate its fuel cells first with	
a) green hydrogen if commercially available or with	Green hydrogen is produced from renewable energy sources and will take immense amounts of installations: https://www.rechargenews.com/transition/a-wake-up-call-on-green-hydrogen-the-amount-of-wind-and-solar-needed-is-immense/2-1-776481
b) blue hydrogen if commercially available, then with	Blue hydrogen is produced from fossil methane sources and will perpetuate the use of fossil fuels: https://www.rechargenews.com/transition/a-wake-up-call-on-green-hydrogen-the-amount-of-wind-and-solar-needed-is-immense/2-1-776481
c) renewable natural gas (RNG) produced specifically from agricultural emissions or via	See (P-21) a) above.
d) biodigestion if commercially available, then with	See (P-21) b) above.
e) RNG commercial [sic] available through DTE, and second using	This is business as usual with DTE fossil methane gas lines.
f) carbon capture technology as soon as it is available, with end-use of captured CO2 either permanent sequestration or	See (P-21) d) above.
g) as offtake in the food-grade CO2 market.	See (P-21) e) above.
(P-23) Notwithstanding paragraphs 21 and 22 above, the DEVELOPER will power, operate and plan MEA overhaul of its fuel cells such that it uses hydrogen fuel as soon as it becomes commercially available, and that it employs carbon capture technology (with end use captured CO2 either permanent sequestration or as offtake in the food-grade CO2 market) as soon as it is commercially available.	

Amendment Section	Question/Observation/Reference
(P-24) See the proposal stated in the resolution.	Is anyone within City staff qualified to assess the reporting that is described?
c) Evidence that DEVELOPER [sic] has procured any carbon credits offsets necessary to maintain Carbon Intensity (CI) 60% lower than electricity incumbent DTE.	It appears that the DEVELOPER plans to purchase carbon offsets. Who will assess the quality of the offsets to be purchased, and the permanence of the carbon capture? https://hbr.org/2023/12/what-every-leader-needs-to-know-about-carbon-credits
Once the DEVELOPER'S microgrid is being fueled by hydrogen (whether green or blue) and is operating with carbon capture, the requirement to fooset with carbon credits wil cease but performance reporting shall continue on an annual basis.	Personal assessment: The project could take a significant amount of city staff time to assure the accuracy and validity of reporting.
(P-25) Failure to comply with paragraphs 21, 22, 23, and 24 above shall be fines in the amount required for the City to purchase offsetting carbon credits.	Back to carbon credits, which are questionable. Is this the base on which the city's zero emissions will rest?