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July 3, 2025

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Updating IRP Guidance to Ensure Compliance with AB 2700

Dear Commissioners:

California's transportation, air quality, and equity goals depend on timely utility investments in the electric grid. As publicly owned utilities play an increasingly central role in delivering the infrastructure needed to support zero-emission vehicles and equipment, we urge the California Energy Commission to take action to ensure that utility planning reflects the law and the scale of the transition ahead.

The California Energy Commission should update its Integrated Resource Plan (IRP) guidance for publicly owned utilities to reflect the requirements of Assembly Bill 2700 (McCarty, 2022), codified in Public Utilities Code Section 9625.¹ This update is essential to ensure that municipal utilities, including the Los Angeles Department of Water and Power (LADWP), develop IRPs that comply with state law and reflect the distribution system investments needed to support transportation electrification.

AB 2700 makes clear that utility planning must proactively support the infrastructure required to meet California's zero-emission transportation goals. The statute states:

“In its relevant distribution planning process, a local publicly owned electric utility shall... facilitate the readiness of their distribution systems to support the level of electric vehicle charging anticipated by Executive Orders No. B-48-18 and N-79-20, the Energy Commission's integrated energy policy report adopted pursuant to Section 25302 of the Public Resources Code, the Energy Commission's assessment prepared pursuant to Section 25229 of the Public Resources Code, and relevant State Air Resources Board regulations [and] other local plans related to electric vehicle charging, including air quality management plans, regional seaport plans, regional transportation plans, and sustainable communities strategies.” (Public Utilities Code § 9625(a))

“A local publicly owned electric utility shall identify any distribution investments made pursuant to this section in its integrated resource plan.” (Public Utilities Code § 9625(b))

¹ Public Utilities Code § 9625, added by AB 2700 (McCarty, 2022). Available at: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2700

LADWP's current IRP does not acknowledge this legal requirement and fails to demonstrate how its planning or investments will support the electrification required by state and local laws, regulations, and goals. The IRP omits medium- and heavy-duty vehicles, non-road cargo-handling equipment, and freight electrification from its planning assumptions, even though LADWP's service territory includes the Port of Los Angeles, major freight corridors, transit hubs, and environmental justice communities disproportionately impacted by diesel pollution. The plan also anticipates negative net growth in peak demand, which is inconsistent with CEC forecasts and recent studies showing the need for nearly 1 gigawatt of charging capacity to electrify trucks in Los Angeles County alone.

Absent updated guidance from the Commission, other publicly owned utilities may follow suit – submitting IRPs that are inconsistent with state policy and inconsistent with the level of electrification required under California law.

To ensure compliance with AB 2700, we recommend that the Commission update its IRP guidance within one year to require publicly owned utilities to:

- Identify how planned and adopted distribution system investments are sufficient to support the level of electrification anticipated by applicable laws and plans;
- Quantify peak load and energy requirements from transportation electrification across light-, medium-, and heavy-duty vehicles and non-road equipment; and
- Demonstrate consistency with the Commission's transportation energy demand forecasts (Section 25229) and relevant regulations and plans.

While we understand the CEC is likely to approve LADWP's current IRP this summer, updating the agency's guidance in parallel will ensure that future IRPs comply with statute and reflect California's clean transportation targets.

We also request that the Commission acknowledge the need to update IRP guidance to reflect AB 2700 during the public discussion of LADWP's IRP. This acknowledgment will provide clarity to utilities statewide and support more consistent implementation of state law.

Thank you for your leadership in aligning utility planning with California's zero-emission goals. As the state continues efforts to accelerate transportation and building electrification, clear and forward-looking distribution planning are essential to delivering the full climate, public health, and affordability benefits of this transition. Updated guidance will help ensure utilities are prepared to do their part to reduce emissions, enhance grid reliability and efficiency, and lower costs for all customers.

Sincerely,



Beth Hammon
Senior Advocate, EVs and Infrastructure
Natural Resources Defense Council