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<b>Docket Number:</b>	21-RPS-02
<b>Project Title:</b>	Renewables Portfolio Standard 10th Edition Guidebook Update
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*Comment Received From: Daniel Baker*  
*Submitted On: 10/20/2025*  
*Docket Number: 21-RPS-02*

## **Los Angeles Department of Water and Power Comment**

Please see the attached document.

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

In the matter of:	)	Docket No. 21-RPS-02
	)	
<i>Renewables Portfolio Standard 10th</i>	)	LADWP Comments Re: Staff
<i>Edition Guidebook Update</i>	)	Workshop on the Draft
	)	Renewables
	)	Portfolio Standard 10th Edition
	)	Guidebook

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE  
CALIFORNIA ENERGY COMMISSION ON THE OCTOBER 6, 2025, WORKSHOP ON DRAFT  
RENEWABLES PORTFOLIO STANDARD GUIDEBOOK, TENTH EDITION**

Dated: October 20, 2025

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**INTRODUCTION**

The Los Angeles Department of Water and Power (“LADWP”) appreciates the opportunity to provide comments to the California Energy Commission (“Commission” or “CEC”) regarding the October 6, 2025, Staff Workshop on the Draft Renewables Portfolio Standard Guidebook (RPS Guidebook), Tenth Edition.

The purpose of the RPS Guidebook is to describe the eligibility requirements and process for certifying facilities that generate RPS-eligible electricity and describes the rules and process for verifying renewable energy certificates (RECs) for compliance with California’s RPS program. On June 5, 2025, LADWP submitted a comment letter to the CEC in response to the scoping meeting on proposed updates to the RPS Guidebook. In that letter, LADWP encouraged the CEC to consider including electricity generating turbines fueled by renewable hydrogen within the RPS eligibility framework.

LADWP is a vertically-integrated publicly-owned electric utility that is in the process of transforming its fleet of electricity generating resources to meet both State and local renewable energy requirements and zero carbon emission goals. In addition to increasing its supply of electricity from renewable generating resources such as solar and wind, LADWP requires local, dispatchable electricity generating resources to integrate variable renewable energy and ensure a reliable and resilient electric grid to serve its customers. LADWP is proposing to construct a renewable hydrogen-ready rapid-response combined-cycle generation system at its Scattergood Generating Station, based on the findings of the Los Angeles 100% Renewable Energy (LA100) Study. This project will reduce overall carbon emissions, enhance grid reliability,

and increase diversity and flexibility in LADWP's generation portfolio. It will also help decarbonize existing thermal generation infrastructure in alignment with California's climate and energy goals. The transition to renewable hydrogen is a key step toward supplying 100% zero-carbon electricity to the City of Los Angeles. Importantly, recognizing renewable hydrogen-fueled electricity generating turbines as RPS-eligible would not diminish LADWP's ongoing and substantial investments in other renewable energy sources such as solar, wind, and geothermal. Instead, renewable hydrogen acts as a complementary solution that supports grid reliability and facilitates the integration of abundant renewable resources, enabling a carbon-free future. For example, LADWP's 2024 RPS percentage is 41 percent and the carbon-free portfolio is approximately 60 percent. LADWP's goal is to achieve 80% RPS by 2030 and 100% carbon-free by 2035.

### **SPECIFIC COMMENTS**

LADWP recognizes the Commission's statement at the workshop that, at this time, it does not have authority to expand RPS eligibility to facilities using renewable hydrogen beyond fuel cells and linear generators, as the current statutory framework does not provide the discretion to include the combustion of renewable hydrogen in electricity-generating turbines. Unlike biogas, an RPS-eligible, carbon-emitting resource—renewable hydrogen offers a cleaner alternative. LADWP appreciates the Commission's reconsideration of the growing interest in renewable hydrogen, and its commitment to tracking developments and engaging with stakeholders across interrelated venues.

Given the critical role renewable hydrogen can play in supporting electric grid reliability, decarbonizing existing infrastructure, and advancing California's clean energy goals, LADWP encourages the Commission to continue engaging and facilitating discussions on this topic. Ongoing collaboration will be essential to inform future policy development and ensure that California remains at the forefront of clean energy innovation.

### **CONCLUSION**

LADWP is grateful for the opportunity to provide comments on this workshop and looks forward to working with the Commission and other stakeholders to add RPS eligibility for use of renewable hydrogen in electricity generating turbines to the RPS Guidebook. If you have any questions, please contact me at (213) 367-0307, or Mr. Jordi Burbano at (213) 367-0343.

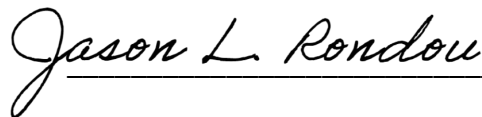
Dated: October 20, 2025

Respectfully Submitted,



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for David Hanson

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