

DOCKETED

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9 Energy Resources

10 Conservation and Development Commission

11 In the Matter of:

Docket No. 15-AFC-01

12 Application for Certification
13 for the PUENTE POWER PROJECT

OBSERVATIONS REGARDING LADWP
PROPOSAL

14 On June 6, 2017, Intervener City of Oxnard docketed a presentation made by the staff of
15 the Los Angeles Department of Water and Power (“LADWP”) to its Board of Water and Power
16 Commissioners that same day (TN #217888). The presentation was referred to by several
17 commenters during today’s continued Committee Conference. Applicant offers the following
18 observations on the LADWP presentation:

- 19 • The reliability needs of the LADWP region are obviously different than the reliability
20 need in the Moorpark subarea, making LADWP’s plans largely irrelevant to these
21 proceedings.
- 22 • LADWP’s current proposal for re-powering its once-through cooling (“OTC”) units calls
23 for a “one-for-one” replacement of every megawatt of OTC generation – a total of 2,830
24 megawatts (p. 3).¹ In contrast, the Puente Project’s 262 megawatts will replace 1,946
25 megawatts of OTC generation at Mandalay Generating Station and Ormond Beach
26 Generating Station.

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28 ¹ Page references are to the LADWP presentation (TN #217888).

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- LADWP has already completed repowering of Haynes Units 3 & 4 (replacing 542 megawatts with 575 megawatts), Haynes 5 & 6 (replacing 584 megawatts with 600 megawatts) and Scattergood Unit 3 (replacing 460 megawatts with up to 590 megawatts) (p. 5).
- LADWP has not made any decision regarding its current plan to repower additional OTC units, only to conduct further study and analysis (p. 6).
- LADWP states that one of the outcomes of the study may be to proceed with repowering of the remaining OTC units as currently planned (p. 8).
- LADWP expects its study to take until early 2018 to complete (p. 8).
- The OTC compliance dates for the remaining LADWP OTC units range from 2025 for the Scattergood facility to 2029 for the Haynes and Harbor facilities, meaning that LADWP has 5-9 years within which to make and implement decisions related to repowering (during which time, units ranging in age from 24-67 years will continue to run) (p. 5). In contrast, the OTC compliance date for the Mandalay Generating Station and the Ormond Beach Generating Station is 2020.

DATED: June 8, 2017

Respectfully submitted,

/s/ Michael J. Carroll

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