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<td>LADWP’s Comments to DRAFT 2017 IEPR and Workshop</td>
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<td>Los Angeles Department of Water and Power (LADWP)</td>
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LADWP's Comments to DRAFT 2017 IEPR and Workshop

Additional submitted attachment is included below.

The LADWP is a vertically-integrated publicly-owned electric utility of the City of Los Angeles, serving a population of over 4 million people within a 465 square mile service territory cover the City of Los Angeles and portions of the Owens Valley. The LADWP is the third largest electric utility in the state, one of five California balancing authorities, and the nation’s largest municipal utility. The LADWP’s mission is to provide clean, reliable water and power in a safe, environmentally responsible, and cost-effective manner.

LADWP provides comments including the following key points:

I. **Renewable Gas**

LADWP supports the IEPR’s recommendation to “identify cost-effective strategies that are consistent with existing state policies and climate change goals by considering priority end uses of renewable gas.” The Draft 2017 IEPR states that additional policies may be needed, and agencies may also need to modify, reconfigure, and enhance regulations, policies and programs to fully enable cost-effective commercialization of renewable gas and maximize methane emissions reductions. On September 16, 2016, the Los Angeles City Council approved a Motion that instructed LADWP to study an equitable transition away from fossil fuels to powering Los Angeles with 100% clean energy. Renewable gas may be a pathway towards 100% clean energy, but without additional policies in place, such as aligning biogas and renewable hydrogen with
Renewable Portfolio Standards, the commercialization of renewable gas would not be enabled nor cost-effective.

II. **Cap and Trade for Transportation Electrification**

The Draft 2017 IEPR includes incentives to address GHG emissions and air pollution objectives through programs targeting the transportation sector. Such revenue from the sales of allowances under the Cap and Trade system will be appropriated to the Greenhouse Gas Reduction Fund for low-carbon transportation projects under California Air Resources Board (CARB). SB 350 recognizes and stipulates that Utilities should not be penalized for increased load and emissions attributed to promoting transportation electrification; however, CARB has yet to finalize a protocol or mechanism for providing GHG credits to Utilities for promoting transportation electrification. LADWP recommends a section in the 2017 IEPR to address this issue that is tied with Cap and Trade as well as CEC’s Transportation Electrification calculator/tool.

III. **California Energy Preliminary Demand Forecast, 2018-2028**

LADWP appreciates the CEC’s forecasts for light-duty EV consumption and also recommends including a forecast for total transportation electrification, including heavy duty EVs, electric buses, electric rails, ships, etc. since other electrification is a significant portion of transportation electrification and will increase electric sales and demand.

LADWP also recommends that the 2017 IEPR considers potential peak shift (utility-provided peak load moving to a later hour) in its Statewide Peak Demand Forecast. As increased amounts of solar are integrated onto the system, the net peak load (load minus variable energy resources) becomes a critically important aspect in the planning process.

IV. **Draft Report Clarifications**

LADWP provides a number of specific clarifying changes to the Draft Report as detailed below:

- Figure ES-3 and Figure 19, on page 10 and 99, respectively, indicates that LADWP’s planned EIM entry is 2019; however, the realistic planned EIM entry for LADWP has been updated to 2020 due to an ongoing GAP analysis.
- Table 8 on page 103 indicates LADWP’s proposed OTC compliance dates as follows:
  - Scattergood 1&2 – plans to repower by December 31, 2020
  - Haynes 1&2 – plans to repower by December 31, 2023
  - Harbor 5 – plans to repower by December 31, 2026
  - Haynes 8 – plans to repower by December 31, 2029
Due to an ongoing OTC Study, the proposed compliance dates have been delayed to the following:
  o Scattergood 1&2 – plans to repower by December 31, 2024
  o Haynes 1&2 – plans to repower by December 31, 2025
  o Haynes 8 – plans to repower by December 31, 2028
  o Harbor 5 – plans to repower by December 31, 2029

The LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-0642 or Ms. Sangeetha Losari at (213) 367-2315.

Dated: November 13, 2017

Respectfully Submitted,

[Signature]

11/13/17

By: Eric G. Montag
Manager of Grid Planning and Development
Los Angeles Department of Water and Power
111 North Hope Street, Suite 1242
Los Angeles, CA 90012
Telephone: (213) 367-0642
Email: Eric.Montag@ladwp.com