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

In the matter of:)	Docket No. 17-IEPR-07
)	
2017 Integrated Energy Policy Report (2017 IEPR))	JOINT AGENCY WORKSHOP
)	
)	RE: Integrated Resource
)	Planning
)	
)	

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION'S (CEC'S) JOINT AGENCY WORKSHOP ON POTENTIAL
METHODOLOGIES TO ESTABLISH GREENHOUSE GAS (GHG) EMISSION REDUCTION TARGETS
FOR PUBLICLY OWNED UTILITY INTEGRATED RESOURCE PLANS**

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit written comments regarding the California Air Resources Board (CARB) and the California Energy Commission's (CEC) Joint Agency Workshop on Potential Methodologies to establish greenhouse gas (GHG) emission reduction targets for publicly owned utilities' (POUs) integrated resource plans (IRPs).

LADWP also supports the comments submitted by CMUA and SCPPA, in addition to comments presented below.

The LADWP is a vertically-integrated publicly-owned electric utility of the City of Los Angeles, serving a population of over 3.8 million people within a 465 square mile service territory covering 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.

During the April 17, 2017, workshop, the Energy Commission included staff presentations on setting greenhouse gas (GHG) baselines and potential methods for determining POU-specific GHG reduction planning targets for 2030, which included the possibility of utilizing a 2009 baseline rather than a 1990 baseline. LADWP supports a 1990 baseline consistent with SB 32 and opposes a 2009 baseline. LADWP has been very progressive in adopting aggressive clean energy goals and programs well before many of today's laws and regulations were in place, and participated in the development of many of the laws and regulations that we see today.

The LADWP supports the CEC and CARB’s efforts in developing guidelines and reaffirms its strong support of the California Global Warming Solutions Act of 2006 Assembly Bill (AB) 32 , Senate Bill (SB) 32, and Senate Bill (SB) 350 goals of expeditiously achieving substantial GHG emission reductions in a cost-effective manner that protects its customers. It is important to note that the 1990 baseline year is articulated in AB 32, SB 32, and SB 350. This 1990 baseline should continue to be used in the IRP guidelines for utilities.

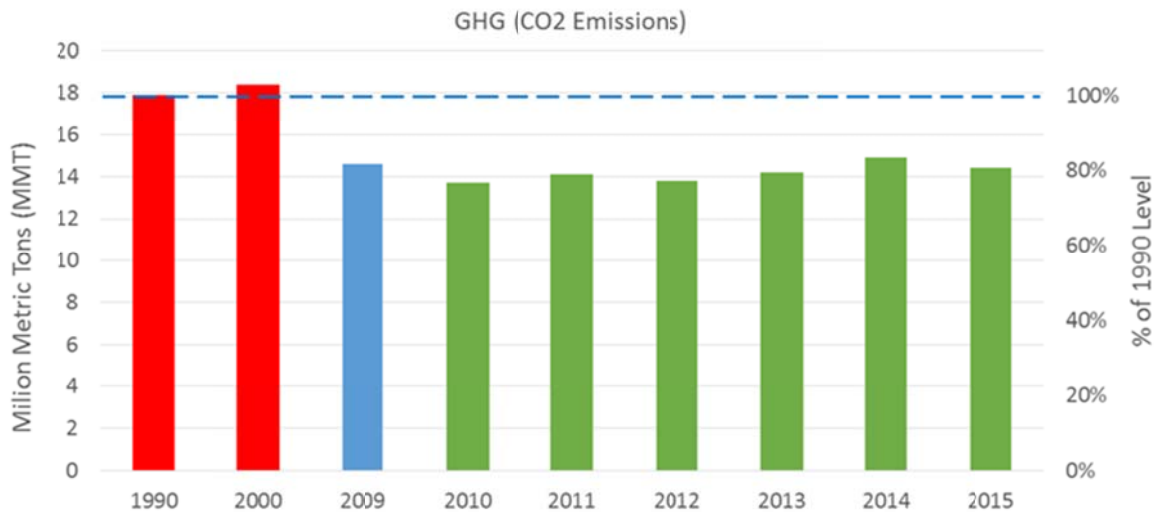
In 2000, LADWP set out to reduce load growth by 50 percent through the use of behind the meter renewables, energy efficiency, and local solar. Today, LADWP has the same electricity consumption as in 2006 despite population growth, largely due to these earlier efforts. In 2005, LADWP adopted a renewable target of 20 percent renewable by 2010, and succeeded to be the largest California municipal utility to achieve 20 percent renewable generation in 2010. Since 1990, LADWP has divested of two out of three coal plants and repowered thirteen natural gas and oil fueled in-basin generating units using cleaner and more efficient new combustion technology, resulting in 19 percent lower greenhouse gas emissions. Establishing a 2009 baseline rather than a 1990 baseline would significantly discount LADWP’s early and aggressive efforts in adopting clean energy goals and programs.

LADWP’s Renewable Portfolio Standard (RPS) started in 2003, well before SB X1-2 became law. The following chart shows LADWP’s historic RPS growth. In 2009, LADWP added a significant amount of wind RPS to its resource stack prior to the 20% RPS by 2010 mandate.



Senate Bill 32 requires California to reduce its GHG levels to 40 percent below the 1990 levels by 2030. LADWP's earlier and aggressive clean energy goals resulted in significant GHG reductions before 2009. Resetting the goal post from 1990 to 2009 would significantly discount LADWP's early efforts and is not consistent with SB 32.

Failure to credit early efforts will discourage utilities from taking independent steps to address important issues without a statutory mandate.



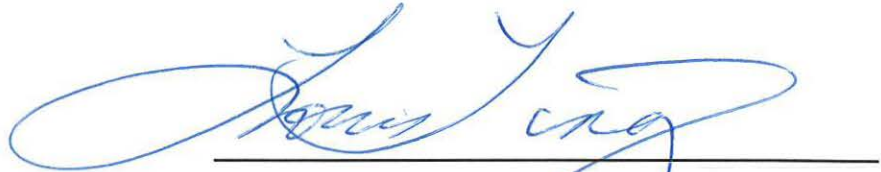
As indicated above, LADWP supports the comments of CMUA and SCPPA. In particular, it is important to note that public utilities have varied backgrounds.

As pointed out in comments submitted by SCPPA, each publicly owned utility faces unique challenges based on their geography, customer base, economic circumstances, population growth, and previous GHG reduction efforts. Any efforts to establish GHG emission reduction targets for POUs must recognize this point. Therefore, LADWP recommends that the 1990 baseline be used to measure LADWP's GHG reduction efforts. This would be consistent with AB 32, SB 32, and SB 350.

The LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-0239 or Ms. Pjoy T. Chua at (213) 367-1750.

Dated: May 1, 2017

Respectfully Submitted,



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