

DOCKETED	
Docket Number:	18-IRP-01
Project Title:	Integrated Resource Plan
TN #:	227610
Document Title:	City of Glendale Water and Power Application for Extension of Time to File 2019 Integrated Resource Plan
Description:	City of Glendale Water & Power Application for Extension of Time to File 2019 Integrated Resource Plan and Standardized Reporting Tables with the California Energy Commission
Filer:	Christine Godinez
Organization:	City of Glendale/Stephen M. Zurn
Submitter Role:	Public Agency
Submission Date:	4/11/2019 11:03:09 AM
Docketed Date:	4/11/2019



CITY OF GLENDALE, CALIFORNIA

Glendale Water & Power
Administration

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glendaleca.gov

April 10, 2019

Drew Bohan, Executive Director
California Energy Commission
1516 Ninth Street, MS-39
Sacramento, California 95814-5504

Re: City of Glendale Water & Power (GWP) Application for Extension of Time to File 2019 Integrated Resource Plan and Standardized Reporting Tables (IRP) with the California Energy Commission (CEC) (Docket # 18-IRP-01)

Dear Mr. Bohan:

The City of Glendale Water & Power Department (GWP or Applicant) respectfully requests an extension of time to file its 2019 Integrated Resources Plan (IRP) with the California Energy Commission (CEC). This application is made pursuant to the CEC's Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines (Guidelines) and Title 20 of the California Code of Regulations, Section 1342 (c).

Chapter 3, Section A of the Guidelines specifies that "the initial IRP adopted by the POU on or before January 1, 2019, must be submitted by the POU or authorized representative to the Energy Commission by April 30, 2019." Chapter 3, Section A of the Guidelines further provides that "POUs that require additional time to submit the IRP Filing may request an extension of deadlines by submitting a written request to the Executive Director, as described in California Code of Regulations (CCR), Title 20, Article 2, and Section 1342(c)(1)." Applicant GWP hereby requests a 90-day extension of time, to July 29, 2019, for the reasons stated herein.

(A) The full legal name, address of the principal place of business, telephone number, fax number, e-mail address, and website address of the company submitting the application for an extension.

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141 N. Glendale Avenue, 4th Floor
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Telephone: (818) 548-2107
Facsimile: (818) 552-2852
E-mail: szurn@glendaleca.gov

Website: <https://www.glendaleca.gov/government/departments/glendale-water-and-power>

(B) The name, address of the principal place of business, telephone number, fax number, and e-mail address of the person employed by the company submitting the report, who should be contacted with questions about the application for an extension.

Tracy Fu, Power Planning Manager
Glendale Water & Power Administration
141 N. Glendale Avenue, 4th Floor
Glendale, CA 91206
Telephone: (818) 550-4574
Facsimile: (818) 409-7141
Email: TFu@Glendaleca.gov

(C) The name of the report and the sections of these regulations applicable to the report.

City of Glendale Integrated Resources Plan;
California Public Utilities Code §9621 and §9622;
The CEC's Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines (Revised Second Edition); and
20 California Code of Regulations §1342(c).

(D) The reasons why the report cannot be, or may not be able to be, submitted on time, and the date the report will be submitted;

On December 18, 2018, the Glendale City Council adopted an IRP in compliance with Section 9621 of the California Public Utilities Code (the 2019 Interim IRP). A copy of the 2019 Interim IRP and City Council Resolution 18-221 approving the 2019 Interim IRP is available at: <https://www.glendaleca.gov/government/departments/glendale-water-and-power/reports-plans/integrated-resource-plan> and was provided to Paul Deaver, CEC Project Manager, on Dec 20, 2018. At the time that the City Council adopted the 2019 Interim IRP, the future of the City of Glendale's aging Grayson Power Plant had not been determined and GWP was in the process of evaluating the results of a Request for Proposals for Local and Regional Renewable, Low-Carbon, and Zero-Carbon Energy and Capacity Resource Options to Serve the City of Glendale (the Clean Energy RFP). Accordingly, when the City Council approved the 2019 Interim IRP on December 18, 2018, the City Council directed GWP to prepare an updated IRP in 2019 that would include the recommended portfolio based upon the results of the Clean Energy RFP. (Please see City Council Resolution # 18-221, posted in the above link). Pursuant to the City Council's direction, GWP is in the process of preparing a 2019 IRP and intends to present the 2019 IRP to the City Council in July of 2019.

If the CEC grants the requested extension of time, and the 2019 IRP is approved by the City Council in July of 2019, GWP will submit the 2019 IRP to the CEC for its review in lieu of the 2019 Interim IRP. However, if the 2019 IRP is not approved by the City Council by July 2019, or if this Application for an extension of time is not granted, GWP stands ready to file the 2019 Interim IRP with the CEC, and following City Council approval of the 2019 IRP, GWP will file

the updated, 2019 IRP to the CEC in accordance with the schedule set forth in Chapter 3, Section A of the Guidelines.

Background:

On June 2, 2015, the Glendale City Council approved an IRP (the 2015 IRP) and directed GWP to proceed with design, engineering, environmental review, and evaluation of financing options for a proposed 250 MW repowering of the Grayson Power Plant in the City of Glendale. GWP developed a plan for a 262 MW repowering project (the Repowering Project) and prepared and circulated an Environmental Impact Report (EIR) for the proposed Repowering Project. The proposed Repowering Project is not CEC jurisdictional because it would not result in a 50MW or more increase in the existing generating capacity of the Grayson Power Plant.

On April 10, 2018, GWP presented the EIR for the proposed Repowering Project to the City Council for certification. On April 10, 2018, the City Council deferred a decision regarding the EIR for the proposed Repowering Project, and directed GWP to issue a Request for Proposals for clean energy alternatives to the proposed Repowering Project.

On May 4, 2018, GWP issued an RFP for Local and Regional Renewable, Low-Carbon, and Zero-Carbon Energy and Capacity Resource Options to Serve the City of Glendale (the Clean Energy RFP). On August 3, 2018, thirty-four proposers submitted proposals for various technologies in response to the Clean Energy RFP. An evaluation team comprised of City staff and outside experts undertook a detailed evaluation of each of the proposals, considering feasibility, experience, environmental performance, administrative burden and contract terms, reliability, and cost effectiveness. The evaluation team conducted interviews with top-ranking proposers, and negotiations are continuing with top-ranked proposers for various technologies.

At the time that the 2019 Interim IRP was finalized, and to this date, no decision has been made regarding the proposed Repowering Project. Additionally, at the time that the 2019 Interim IRP was approved, the evaluation of the Clean Energy proposals was not as far along in the process. Therefore, while the 2019 Interim IRP meets all legal requirements, the 2019 IRP will provide more specific, detailed information regarding possible portfolios to serve the City of Glendale.

GWP is currently completing the 2019 IRP. The IRP will include modeling of alternative portfolios based upon the results of the Clean Energy RFP process. In addition to modeling clean energy alternatives, GWP is currently conducting IRP stakeholder workshops to gather public input for the IRP, and since March, GWP has been conducting an online survey regarding the 2019 IRP. GWP will be compiling the stakeholder feedback and completing the IRP, and GWP intends to present the 2019 IRP and an update to the City Council regarding the Clean Energy RFP results in July 2019.

GWP believes that the 2019 IRP will provide the CEC and the public with the most meaningful information regarding GWP's integrated resources planning as it will include the modeling of portfolios based upon the results of the Clean Energy RFP. Therefore, GWP respectfully requests an extension of time to file its IRP with the CEC.

(E) The measures the company is taking to complete the report on time or as soon thereafter as possible.

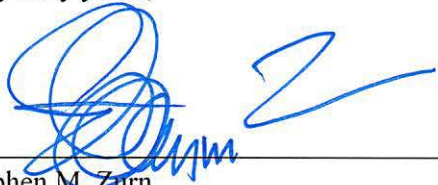
As stated above, the 2019 Interim IRP was timely completed and was approved by the Glendale City Council on December 18, 2018. GWP is in the process of completing the 2019 IRP and intends to present the 2019 IRP to the Glendale City Council in July 2019.

(F) A declaration executed under penalty of perjury under the laws of the State of California in compliance with 20 CCR Section 1342(c)(1)(F).

The subject Declaration is attached to this Application as Attachment 1.

For the foregoing reasons, Applicant GWP respectfully requests that the Executive Director find that good cause exists for the extension and grant Applicant an extension of time to submit the report by July 29, 2019.

Very truly yours,



Stephen M. Zurn
General Manager, Glendale Water & Power

Cc: Paul Deaver, California Energy Commission (via email to Paul.Deaver@energy.ca.gov)
Mark Young, Integrated Resources Planning Administrator
Tracy Fu, Power Planning Manager, GWP
Christine A. Godinez, Principal Assistant City Attorney

Attachment 1
Declaration Pursuant to 20 CCR Section 1342(c)(1)(F)

I, Stephen M. Zurn, declare as follows:

1. My full legal name is Stephen M. Zurn. I am the General Manager of Glendale Water & Power, a Department of the City of Glendale (GWP). I submit this Declaration in support of GWP's Application for an Extension of Time to File the GWP's Integrated Resources Plan with the California Energy Commission (Application).

2. My principal place of business, telephone number, fax number, and email address are as follows:

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141 N. Glendale Avenue, 4th Floor
Glendale, CA 91206
Telephone: (818) 548-2107
Facsimile: (818)552-2852
E-mail: szurn@glendaleca.gov

3. GWP's principal place of business, telephone number, fax number, and e-mail address are as follows:

City of Glendale
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4. I am authorized to execute this Declaration and submit this Application on behalf of GWP and the City of Glendale.

5. The matters contained in the Application are, to the best of my knowledge and belief, and based on diligent investigation, true, accurate, complete, and in compliance with the California Energy Commission's regulations.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.



Stephen M. Zurn

Date: 4.10.2019