

DOCKETED	
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Submitted On: 9/19/2019
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19-IRP-100 LADWP's Comments on the SB 100 Report Workshop

Additional submitted attachment is included below.

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

In the matter of:)	Docket No. 19-SB-100
)	
SB 100 Joint Agency Report: Charting a)	COMMENTS TO SENATE BILL
Path to a 100% Clean Energy Future)	100 REPORT AND WORKSHOP
)	
)	RE: SB 100 Joint-Agency Report
_____)	

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION’S (CEC’s), THE CALIFORNIA PUBLIC UTILITIES
COMMISSION’S (CPUC’s), THE CALIFORNIA AIR RESOURCES BOARDS’S (CARB’s) WORKSHOP
ON THE SENATE BILL 100 JOINT-AGENCY REPORT**

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Dated: September 19, 2019

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OF THE STATE OF CALIFORNIA**

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ON THE SENATE BILL 100 JOINT-AGENCY REPORT**

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit these written comments on the September 5, 2019 workshop to initiate the public process for the Senate Bill 100 (SB 100) Joint-Agency Report.

The City of Los Angeles’ Green New Deal (2019 Sustainability pLAn) guides the city’s transition to an equitable and abundant economy powered by 100% renewable energy. Within this overall city vision, the Mayor’s 2019 Sustainability pLAn has four key principles (1) a commitment to the Paris Climate Agreement, (2) community level environmental justice and equity, (3) helping Angelenos transition to good paying green jobs, and (4) using the City’s human and financial capital to drive change.

In addition, at the request of Mayor Eric Garcetti and the Los Angeles City Council, in 2017 LADWP launched the LA100 Study (100% Renewable Energy Study) to determine what investments should be made to achieve a 100% renewable energy supply. This comprehensive study is being developed with input from the LA100 Advisory Group, comprised of technical experts, research universities, commercial / industrial customers, local government officials, and community interest groups, among other partners. The study results are expected in 2020 and LADWP hopes to further contribute to the draft Joint-Agency Report next year.

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 that

covers 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. 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. Senate Bill (SB) 100's "Zero Carbon Resources" post 2030

As the CEC, CPUC, and CARB develop their SB 100 Joint-Agency Report, LADWP supports the inclusion of large hydro and nuclear to count towards the 40% zero carbon resources post 2030. SB 100's author, Senator Kevin De Leon wrote a letter¹ dated August 30, 2018 to the Secretary of the Senate to include in the Senate Daily Journal to express his intent to have the law remain technology neutral for existing zero carbon resources. He intended to include not only nuclear power, but also large hydroelectric generation in "existing zero-carbon generation facilities." LADWP has a 5.7% direct ownership interest in the Palo Verde Nuclear Generating Station that does not expire until 2047. In addition, a few years ago LADWP extended its Hoover Dam large hydro power purchase agreement with the United States Department of Energy Western Area Power Administration starting October 1, 2017, through September 30, 2067. Similarly, LADWP is currently going through an Integrated Licensing Process with the Federal Energy Regulatory Commission to obtain a 50-year license extension, from February 2022 through January 2072, for Castaic Power Plant. The license will allow LADWP to continue operation of the pumped hydro power plant. The plant is capable of providing 1,275 MW zero carbon energy to assist grid reliability and integration of renewables. The exclusion of these existing obligations to deliver electricity to California customers from existing zero carbon generation facilities, such as Palo Verde, Hoover Dam, and Castaic Pumped Hydro Plant from meeting SB 100 targets post 2030 would result in stranded assets and significant increased cost to ratepayers.

II. Reliability and Resiliency

LADWP appreciates the CEC, CPUC, and CARB's efforts in recognizing and including reliability and resiliency in developing the SB 100 Joint Agency Report. LADWP recommends establishing a forum of technical experts similar to the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) under the California State

¹ De Leon, Kevin. "Letter to Senate Daily Journal on SB 100". 30 August 2018. Daniel Alvarez, Secretary of the Senate, State Capitol Room 400, Sacramento, CA.

Water Resources Control Board , to evaluate the potential benefits and impact on system reliability and resiliency.

III. Incorporate load growth from Transportation and Building Electrification

LADWP encourages the CEC, CPUC, and CARB to consider the potential impacts from significant load growth from transportation and building electrification. The City of Los Angeles' Green New Deal guides our city's transition to an equitable and abundant economy powered by 100% renewable energy. Within this overall City vision, the Mayor's 2019 Sustainability pLAN has very aggressive transportation and electrification goals. With a target of 80% zero emissions vehicles in Los Angeles by 2035, LADWP's load could significantly increase [from approximately 35,000 GWhs to 52,000 GWhs] by 2050.

IV. Technical and Geographic Diversity of Clean Resources

LADWP supports the emphasis on technical and geographic diversity of clean resources to help improve reliability from intermittent resources. Also, LADWP identifies resources based on system needs to improve reliability and reduce rate payer impacts. With a technologically evolving environment, LADWP appreciates legislative and regulatory oversight to not be prescriptive of specific renewable technology.

V. Equity Metrics

LADWP supports the CEC, CPUC, and CARB's goal to utilize SB 100 to address equity. LADWP also recommends that in developing the SB 100 report, the Joint Agencies would consider locational benefits of distributed energy resources (DER), as targeted DERs at specific locations can defer distribution upgrades and support local transmission. This becomes a critical element to strategically deploy DER in specific locations as LADWP retires its once-through cooling units by the end of 2024 and 2029.

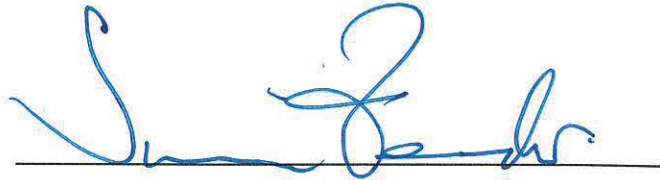
VI. Stakeholder Input

LADWP appreciates the opportunity to provide comments during the stakeholder period. We look forward to the draft report anticipated to be released in the summer of 2020, and the approval of the final report later that year. LADWP recommends the Joint Agencies create a draft schedule of dates for the commenting period so that LADWP will have sufficient lead time to review and provide meaningful comments.

LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-2525, or Mr. Scott Hirashima at (213) 367-0852.

Dated: September 19, 2019

Respectfully Submitted,



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