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Submitted On: 4/20/2022
Docket Number: 21-OIR-03*

**LADWP's Response to CEC's 15-Day Language Revisions to
Regulatory Language for the Load Management Standards
Regulations**

Additional submitted attachment is included below.

**BEFORE THE STATE OF CALIFORNIA ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**

In the matter of:)	Docket No. 21-OIR-03
)	
)	RE: 15-Day Language
<i>2022 Load Management</i>)	Revisions to Regulatory
<i>Rulemaking</i>)	Language for the Load
)	Management Standards
)	Regulations

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE
CALIFORNIA ENERGY COMMISSION ON THE 15-DAY LANGUAGE REVISIONS TO
REGULATORY LANGUAGE FOR THE LOAD MANAGEMENT STANDARDS REGULATIONS**

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INTRODUCTION

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments to the California Energy Commission (Commission) regarding the *15-Day Language Revisions to Regulatory Language for the Load Management Standards Regulations* (California Code of Regulations Title 20 §§ 1621, 1623).

The City of Los Angeles (City of LA) is a municipal corporation and charter city organized under the provisions set forth in the California Constitution. LADWP is a proprietary department of the City of LA, pursuant to the Los Angeles City Charter, whose governing structure includes a mayor, a fifteen-member City Council, and a five-member Board of Water and Power Commissioners (Board). LADWP is the third largest electric utility in the state, one of five California Balancing Authorities, and the nation’s largest municipal utility, serving a population of over four million people within a 478 square mile service territory that covers the City of LA and portions of the Owens Valley. LADWP exists to support the growth and vitality of the City of Los Angeles, its residents, businesses and the communities we serve, providing safe, reliable and cost-effective water and power in a customer-focused and environmentally responsible manner.

SPECIFIC COMMENTS

While LADWP shares the Commission's statewide vision for a carbon-free grid that employs real-time signaling, LADWP wishes to reiterate its belief that ratemaking authority should continue to lie within the purview of the utilities' respective ratemaking bodies.

LADWP has previously submitted comments during both the informal Load Management Rulemaking (Docket: 19-OIR-01) and the 2022 Load Management Rulemaking (Docket: 21-OIR-03) on March 16, 2020, April 23, 2021, and February 7, 2022.

Prior comments highlighted LADWP's considerations in areas such as technical feasibility, cybersecurity, and equity. While these items remain relevant for LADWP, LADWP's core concern regarding the latest proposed regulatory language remains in the area of ratemaking authority. LADWP requests that the ratemaking authority concern be addressed prior to adoption of the regulation.

I. LADWP'S JURISDICTIONAL CONCERNS AND PROPOSED RESOLUTION OF CONCERNS

LADWP observes that the 15-day language has not mitigated utility concerns regarding ratemaking authority. Although the proposed language allows for utilities to present their proposed rate structures to their respective ratemaking bodies, §§1621(d)-(f) enable the Commission to dictate compliance, exemption, and enforcement with regard to rate structure, a fundamental aspect of ratemaking. LADWP continues to believe that ratemaking lies within the jurisdiction of ratemaking authorities, rather than that of the Commission.

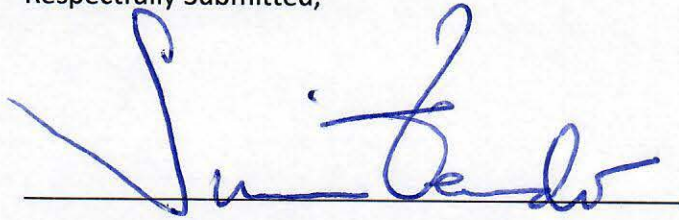
LADWP believes that the proposed revisions by the Joint Publicly Owned Utilities, including LADWP, filed by CMUA on April 20, 2022, and entitled *Joint Proposed Modifications to 15-Day Language Revisions to Load Management Standard Regulations*, provide a viable solution that would enable load management implementation to move forward while respecting ratemaking jurisdiction.

CONCLUSION

LADWP is grateful for the opportunity to participate in the rulemaking process and looks forward to continue working with the Commission to help shape appropriate and effective regulations that will benefit the health, safety, and security of all California residents. If you have any questions, please contact me at (213) 367-2525, or Mr. Scott Hirashima at (213) 367-0852.

Dated: 04/20/2022

Respectfully Submitted,



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