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Docket Number: 22-IEPR-05*

**December 2, 2022, IEPR Commissioner Workshop on Western
Electricity System Integration**

Additional submitted attachment is included below.

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

In the matter of:)	Docket No. 22-IEPR-05
)	
)	RE: Western Electricity
<i>2022 Integrated Energy Policy</i>)	System Integration
<i>Report Update (2022 IEPR</i>)	
<i>Update)</i>)	
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE
CALIFORNIA ENERGY COMMISSION ON THE DECEMBER 2, 2022, IEPR COMMISSIONER
WORKSHOP ON WESTERN ELECTRICITY SYSTEM INTEGRATION**

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

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<i>2022 Integrated Energy Policy</i>)	RE: Western Electricity
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE
CALIFORNIA ENERGY COMMISSION ON THE DECEMBER 2, 2022, IEPR COMMISSIONER
WORKSHOP ON WESTERN ELECTRICITY SYSTEM INTEGRATION**

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments to the California Energy Commission (Commission) regarding the December 2, 2022, Integrated Energy Policy Report (IEPR) Commissioner Workshop on Western Electricity System Integration.

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 LA, its residents, businesses and the communities it serves, providing safe, reliable, affordable, and cost-effective water and power in a customer-focused and environmentally responsible manner.

LADWP appreciates the general discussion and information presented during the December 2, 2022, IEPR workshop on Western Electricity System Integration. The discussions lend themselves to a number of follow up questions such as various complex and jurisdictional issues related to the impacts of integrated or regionalized electric systems including the identification and distribution of benefits as well as burdens on Publicly Owned Utilities, such as LADWP, and their customers.

Similarly, another important area that warrants further discussion is cost allocation and its impacts through an assessment of equity to understand the pros, cons, and effects of an integrated electric system on various jurisdictions, customer segments, socio-demographic groups, and communities.

LADWP is grateful for the opportunity to comment on this workshop and looks forward to working with the Commission to help shape appropriate and effective policies 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: 12/23/2022

Respectfully Submitted,

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