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Comments on Proposed DEBA Program Guidelines

Additional submitted attachment is included below.

**BEFORE THE STATE OF CALIFORNIA ENERGY
COMMISSION**

In the matter of:)	Docket No. 22-RENEW-01
)	
)	LADWP Comments Re:
<i>Reliability Reserve Incentive</i>)	Proposed Draft DEBA
<i>Programs</i>)	Program Guidelines
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE CALIFORNIA
ENERGY COMMISSION ON THE PROPOSED DRAFT DISTRIBUTED ELECTRICITY BACKUP ASSETS
PROGRAM GUIDELINES**

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INTRODUCTION

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide input to the California Energy Commission (Commission) regarding the proposed draft *Distributed Electricity Backup Assets (DEBA) Program Guidelines, First Edition* released on August 11, 2023.

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. LADWP is the third largest electric utility in the state, one of five California Balancing Authorities (BAs), 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 we serve, providing safe, reliable and cost-effective water and power in a customer-focused and environmentally responsible manner.

LADWP provides the following general comment for the Commission to consider as it develops these *DEBA Program Guidelines*, subsequent Grant Funding Opportunities, and any related processes.

GENERAL COMMENT

1. The Local BA Must Be the Sole Authority In Control of Dispatching Assets within its BA Area.

As the Commission implements the program, LADWP requests that the Commission ensure that the program remains focused on providing funding and does not develop into a program that impacts a BA's ability to maintain reliability.

As LADWP previously noted in its comments on the DSGS Program Guidelines proposal where the Commission proposed allowing participants to dispatch their assets in direct response to entities other than the local BA, the Commission should carefully consider the implications of such a proposal. Any such proposal undermines the ability of a local BA, such as LADWP, to maintain visibility and reliability of its system. Any dispatch of generation or reduction in load within the BA area must be controlled by the local BA since a surplus or a deficiency in energy can cause adverse impacts to the reliability of the bulk power system.

The Commission must also consider the fact that BAs are obligated to operate in accordance with the North American Electric Reliability Corporation (NERC) Reliability Standards¹. The NERC Reliability Standards require each BA to maintain the reliability of its own BA area via its own actions or by issuing Operating Instructions. The NERC Reliability Standards also specify the coordination that is required during Energy Emergency Alerts to ensure the reliability of the bulk power system. To ensure that BAs are able to operate in a manner that is consistent with the NERC Reliability Standards, LADWP would caution the Commission against implementing the program in any way that obligates the local BA to operate in a specific manner. For instance, the program should not establish any rules or requirements that are inconsistent with NERC Reliability Standards or the local BA's established practices.

¹ Examples of applicable NERC Reliability Standards:

- PER-003-2 requires applicable entities to certify its personnel to perform all reliability-related tasks.
- PER-005-2 requires each BA to develop their own reliability-related tasks and provide corresponding training.
- EOP-011-2 requires that in emergencies, the certified and trained personnel need to follow the BA's emergency plans, including protocols for Energy Emergency Alerts.
- TOP-001-5 requires that those trained and certified to be the ones to maintain system reliability through their own actions or instructions.

CONCLUSION

LADWP appreciates the opportunity to participate in this rulemaking process and looks forward to working with the Commission to help shape appropriate and effective program guidelines that will benefit the health, safety, and security of all California residents. If you have any questions, please contact me at (213) 367-4631, or Mr. Scott Hirashima at (213) 367-0852.

Dated: 8/31/2023

Respectfully Submitted,

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