

## DOCKETED

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## **Comments from LADWP on Draft 2015 Integrated Energy Policy Report Scoping Order**

Please see attached for comments from LADWP on Draft 2015 Integrated Energy Policy Report Scoping Order.

Thank you.

Pjoy Chua

Manager of Regulatory Standards and Compliance

Los Angeles Department of Water and Power

*Additional submitted attachment is included below.*

**February 6, 2015**

## **COMMENTS FROM LADWP ON DRAFT 2015 INTEGRATED ENERGY POLICY REPORT SCOPING ORDER**

The LADWP is pleased to participate in the California Energy Commission (CEC) Integrated Energy Policy Report Proceedings. LADWP submits the following comments in accordance with the Notice of Request for Public Comments on Draft 2015 Integrated Energy Policy Report Scoping Order posted by the CEC.

### **Renewables**

In light of Governor Brown's goal to increase renewables to 50 percent of California's electric use by 2030, the list of eligible renewable resources should also be expanded. The CEC should consider the following renewable technologies as eligible renewable resources to count towards Governor Brown's 50 percent goal:

- Solar installations owned by California residents and incentivized by electric utilities regardless of metering limitations (or regardless of the presence of actual metered data)
- Large Hydroelectric Facilities (Hoover Dam, British Columbia large hydro)
- Pump Storage Hydroelectric Facilities (Castaic)

In addition, all renewable resources directly connected to a California utility balancing authority should qualify for Portfolio Content Category (PCC) 1. LADWP offered an additional premium to its customer or the third party that allows LADWP to retain electricity generation and Renewable Energy Certificates (RECs) from distributed generation systems for the purposes of LADWP's compliance towards the Renewable Portfolio Standards (RPS). LADWP has successfully installation of over 123 Megawatts (MW) of generation capacity. If the installation occurred prior to June 1, 2010, then such procurement should be categorized as PCC1, regardless if the product is obtained bundled or unbundled. DG categorized as PCC3 results in undercounting California's progress toward achieving its RPS and GHG reduction goals.

As effort is made to increase renewable goals, comparable effort should also be invested toward studying the impact of renewable resources on the reliability of California's power grid. Goals should be set in a manner that gives utilities the flexibility to set adoption targets that allow for a sustainable integration of those resources that minimize the effects on rates. Moreover, the State Legislature and CEC should also identify funding sources that will be needed to comply with mandated goals for distributed generation and energy storage.

### **Electricity**

Analysis should be done to explore the effects of water conservation on electricity production. (specifically with hydroelectric facilities)

### **Transportation**

Analysis of alternate vehicle technologies should not only focus on electric vehicles, but also explore ways to make EV charging stations readily available to EV drivers throughout California. We must work

to make EV charging stations as abundant as gasoline stations to be successful in our efforts to increase the electrification of transportation.

Electrification of the transportation sector will cause additional load demand. LADWP is utilizing its diverse resource mix to keep up with more charging stations. Credit should be given to utilities providing charging services in their respective areas.

### **General Comment**

Energy policy should be integrated across all sectors including electricity, transportation, natural gas, etc. A shift in fuel from one sector to another to reduce overall fuel consumption or reduce emissions should yield a credit for the sector that carries the burden of more fuel consumption. An example of this would be the electrification of the transportation industry.

### **Closing**

There should be great caution in giving specialty carve-outs for unique technologies (i.e. PCC 1, 2, 3, or solar, energy storage, geothermal etc.). The utilities should be given latitude towards least cost and best fit approaches to achieve RPS goals and GHG reduction. This will allow for a diversity of approaches and creative solutions while allowing for critical measures of reliability and integration. As the CEC develops eligibility and portfolio content category requirements, appropriate credit should be given to the efforts undertaken by POUs to aggressively mitigate greenhouse gas while maintaining electric grid reliability.

Respectfully Submitted,

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