

## DOCKETED

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*Comment Received From: Sean Neal*

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**Imperial Irrigation District Comments in Response to April 17, 2017 Workshop on  
Potential Methodologies to Establish Greenhouse Gas Emission Reduction Targets  
for Publicly Owned Utility Integrated Resource Plans**

*Additional submitted attachment is included below.*



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Via e-Comment Portal

California Energy Commission  
Docket Unit  
Docket No. 17-IEPR-07  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

**Re: *In the Matter of: 2017 Integrated Energy Policy Report (2017 IEPR), Docket No. 17-IEPR-07 Imperial Irrigation District Comments in Response to April 17, 2017 Workshop on Potential Methodologies to Establish Greenhouse Gas Reduction Targets for Publicly Owned Utility Integrated Resource Plans***

The Imperial Irrigation District (“IID”) offers comments pursuant to the California Energy Commission’s (“Energy Commission”) April 3, 2017 “Notice of Joint Agency Workshop on Potential Methodologies to Establish Greenhouse Gas Emission Reduction Targets for Publicly Owned Utility Integrated Resource Plans.” The Energy Commission’s April 3 Notice scheduled a Workshop held on April 17, 2017 to discuss issues related to the development of potential methodologies to establish publicly owned utility (“POU”)-specific greenhouse gas (“GHG”) reduction planning targets for use in POU’s individual Integrated Resource Plans (“IRPs”).

IID is an irrigation district, located in Southern California, organized and operated pursuant to the California Water Code, which undertakes both electric and water operations. IID is subject to Senate Bill 350’s (de Leon, 2015) requirement to submit IRPs to the Energy Commission.

IID’s commitment to State energy policy goals is reflected in its investments in directly owned and contractually procured renewable and storage resources for its customers, as well as creating a welcoming business environment for the development of geothermal, solar and other renewable resources. IID is a strong supporter of dispatchable geothermal to reduce GHG while mitigating the effects of intermittent renewables. Illustrating its commitment, IID is pleased to relate that it has been named as one of a select group of utilities that connected storage to the grid in 2016, earning it a spot on the annual Top 10 utility industry lists compiled by the Smart Electric Power Alliance (“SEPA”), including a

ranking of No. 1 on the Utility Energy Storage list with 30 megawatts of installed storage in 2016.<sup>1</sup>

In submitting these Comments today, IID expresses its support for the Comments submitted on this day by the Southern California Public Power Authority (“SCPPA”), of which IID is a member, in the above-referenced docket regarding the April 17 Workshop. By submitting additional Comments, IID provides an individual utility-specific perspective on the issues raised at the April 17 Workshop, particularly as to the issue of GHG “baselines” applied to the POUs.

IID understands “baselines” to be set for each of the POUs in order to allow the Energy Commission to track individual POUs’ emissions reductions going forward. IID is unclear as to how the concept of individual POU “baselines” would be applied, as IID understands from recent information that individual baselines will not be a component of the forthcoming IRP Guidelines nor be an input into the GHG targets adopted by the California Air Resources Board (“CARB”).

To the extent that individual POU GHG baselines are used by the Energy Commission, SCPPA is suggesting in its comments submitted today that the Energy Commission consider exercising deference to the POUs in establishing baselines, given the widely differing characteristics of the POUs, even among the SCPPA members. The leading two options for baselines are 1990 or 2009. SCPPA describes some of the characteristics that support use of each of the two options. IID supports use of 2009 as a baseline.

Use of 2009 as a baseline year provides more of an apples-to-apples comparison for IID to the present day than 1990. In 2009, IID deployed a more diverse resource mix, in contrast to 1990 which relied on fewer fuels. The California Global Warming Solutions Act of 2006 (Assembly Bill 32 (Nuñez/Pavley, 2006)) had been passed by 2009, and utilities were beginning to update their resource mix. IID was no different, and by 2009, IID had begun to update its policies that better reflect present policies for the procurement of renewable resources. To illustrate how 1990 would represent an inadequate comparison, IID notes that it used oil-fueled generation in 1990. By 2009, IID had already begun to alter its resource mix to meet the new policies. Proportionately, the estimated emissions intensity in 1990 was .75mtco2e/MWH compared to 2009’s .60mtco2e/MWh, a 20% decrease which more closely reflects today’s emission stacking practices in a higher load environment. Equally important is IID’s load or energy requirements have increased by more than 66% from 1990 to 2009, plus behind the meter programs and efficiency standards have changed IID’s load profile. As 2009’s load and energy requirements for IID are more comparable to IID’s load and energy requirements of the present day, 2009 provides a more accurate comparison.

Lastly, as CEC staff has pointed out, 2009 represents an average hydropower year. IID relies on a not insubstantial amount of hydropower (approximately 85 MW) from units installed on the All-American Canal and nearby branches.

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<sup>1</sup> <http://www.iid.com/Home/Components/News/News/553/30?backlist=%2f>

IID thanks the Commission for the opportunity to submit written comments. IID looks forward to further dialogue on these issues.

Respectfully yours,



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