

DOCKETED

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

April 13, 2017

via e-mail

Mr. Rob Oglesby
Executive Director
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-IEPR-02; Docket No. 17-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 2017 Integrated Energy Policy Report (IEPR): Request for Extension to File Electricity Resource Plans and Electricity Demand Forecasts

Dear Mr. Oglesby:

Metropolitan Water District of Southern California (Metropolitan) respectfully requests an extension of time to submit the required electricity resource plans and electricity demand forecasts in the 2017 IEPR, under the process set forth in the California Code of Regulations, Title 20, Article 2 and Section 1342. Metropolitan seeks an extension of time for filing in order to allow the Metropolitan Board to meet on May 5 and 6 to consider programs related to the expiration of our Service and Interconnection Agreement with Southern California Edison. We acknowledge that we are filing this out of time and seeking approval on shortened notice and we appreciate the Commission's consideration of the request.

Metropolitan is a regional water wholesaler that delivers water to 26 member public agencies, which in turn provides water to more than 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego and Ventura counties. To supply Southern California with reliable water, Metropolitan owns and maintains our own electric transmission system to serve our pumps on the Colorado River Aqueduct. This system includes 305 miles of 230kV transmission lines serving a series of five large pumping plants and does not include any retail load. Because these pumping plants have very little to no storage, Metropolitan's load is extremely predictable and flat and thus the system has a very high load factor. Metropolitan's energy needs are primarily served under long term federal hydropower contracts from the Hoover Dam Power Plant and Parker Dam Power Plant.

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Since the 1980's Metropolitan's Colorado River Aqueduct electrical system has been operated under a Service and Interconnection Agreement with Southern California Edison (Edison). Edison has been responsible for the transmission operator and energy scheduling service functions on these lines and Metropolitan's reliability requirements and system data has been included as part of Edison's. This agreement is set to expire in September 2017 and has prompted a series of new agreements between Metropolitan and several other entities, including the California Independent System Operator (CAISO), as Metropolitan resumes full control over our own system for the first time in 30 years.

As part of negotiations for these new agreements, Metropolitan has been working with the CAISO and with Commission staff to decide how to manage reporting around Metropolitan's extremely unique system. Metropolitan intends to submit our own data as of October following the expiration of the Service and Interconnection Agreement in September. In working through the requirements for separating Metropolitan from Edison, Metropolitan has determined that our Board's approvals will be essential to providing the data to the Commission. At this point the earliest we can set the Board decisions are at the May Board meeting dates. Thus, Metropolitan requests more time to provide this information to the Energy Commission with an extension to May 12.

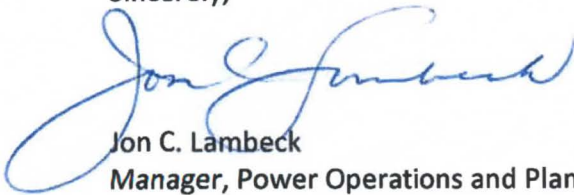
Metropolitan requests an extension on the following forms it intends to file:

- A. Electricity Resource Plan Forms
Administrative Information, S-1 CRATS, S-2 Energy Balance, and S-5 Bilateral Contracts
- B. Electricity Forecast Forms
Forms 1, 2, 3, 4, 6, and 8

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The Metropolitan Board will meet on May 5 and 6 to approve Metropolitan's Resource Adequacy Program and thus Metropolitan requests an extension from April 17 and April 21 to May 12 to submit these forms. Metropolitan is committed to submitting accurate and high quality data as it resumes control of our own system and appreciates the Energy Commission's consideration of the extension. Should you have any questions, please do not hesitate to contact me at jlambeck@mwdh2o.com or (213) 217-7381.

Sincerely,



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