

DOCKETED

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IEPR Commissioner Workshop on Draft Guidelines for POU IRP

Additional submitted attachment is included below.

**BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

In the matter of:)	Docket No. 17-IEPR-07
)	
2017 Integrated Energy Policy Report and)	COMMENTS TO WORKSHOP
Integrated Resource Plans (Publicly Owned)	AND DRAFT GUIDELINES
Utilities))	
)	RE: Publicly Owned Utilities -
)	Integrated Resource Planning
)	

COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE CALIFORNIA ENERGY COMMISSION'S (CEC's) IEPR COMMISSIONER WORKSHOP ON DRAFT GUIDELINES FOR PUBLICLY OWNED UTILITY INTEGRATED RESOURCE PLANS

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit written comments regarding the DRAFT Publicly Owned Utility (POU) Integrated Resource Plan (IRP) Submission and Review Guidelines.

In addition to comments presented here, LADWP also supports the comments submitted by CMUA and SCPPA.

The LADWP is a vertically-integrated publicly-owned electric utility of the City of Los Angeles, serving a population of over 3.8 million people within a 465 square mile service territory covering the City of Los Angeles and portions of the Owens Valley. The LADWP is the third largest electric utility in the state, one of five California balancing authorities, and the nation's largest municipal utility. The LADWP's mission is to provide clean, reliable water and power in a safe, environmentally responsible, and cost-effective manner.

Please find below LADWP's comments on the IRP Submission and Review Guidelines. For ease of reference and to assist with context, the section and page number from the CEC staff guidelines precedes the summary note:

- A. Renewable Procurement (Chapter 2, Section F.2.b – page 6)**
- LADWP recommends removing the requirement to report historical renewable procurement through the Integrated Resource Plan (IRP) Filing process. Historical Renewable Carryover from pre-2011 procurement and excess procurement from previous compliance periods are outside the scope of the IRP's 20-year forward planning horizon. The abovementioned data will be reported through the Renewable Portfolio Standard (RPS) Compliance Report. Typically, as reflected in its IRP, LADWP plans to procure sufficient RPS through

projects without the use of excess procurement from previous compliance periods.

B. Local Reliability Area (Chapter 2, Section G.2 – page 11)

- LADWP recommends revising this section to require a general discussion of local transmission constraints. Information related to local transmission constrained areas in the POU service territories, where loads can be reliably served only if there is sufficient local dispatchable generation capacity that provides operating reserves and associated energy under high-load conditions, is highly confidential and sensitive for critical infrastructure protection. Local transmission constrained areas relate to, among other things, the transmission and transportation of energy, which constitutes “critical energy/electric infrastructure information.” 18 C.F.R. §§ 388.113(c); 18 C.F.R. § 388.112; 6 U.S.C. §§ 131, 133. Data regarding critical energy infrastructure information is deemed confidential and exempted from disclosure pursuant to Government Code Sections 6254(k) and 6254(ab). This exemption applies to information relating to NERC data, which “contain information about where the power is sourced and delivered; the responsible parties in the receipt, delivery and movement of the power; the timing; and the volumes and specified details regarding which transmission paths are used.”¹ The Federal Energy Regulatory Commission (FERC) treats this data as non-public information.²

C. Flexible Capacity (Chapter 2, Section G.3 – page 11)

- Demonstrating that a resource portfolio has sufficient flexibility is subject to a wide range of approaches and methodologies and is highly subjective. The determination of flexibility requires many assumptions and, at a minimum, would require production cost modeling software. Assessing flexibility in a detailed manner can be very time consuming and expensive, and many smaller POU’s may have difficulty demonstrating flexibility without balancing authority participation. LADWP therefore recommends a qualitative discussion on steps taken by the utility to improve flexibility of the resource portfolio to integrate renewables.

D. Greenhouse Gas Emissions (Chapter 2, Section H – page 11)

- LADWP recommends a standardized approach that utilizes Net Energy for Load (NEL) for Greenhouse Gas Emissions Intensity calculations. POU’s within the CAISO may not be aware of their utilities proportion of the overall CAISO NEL and may need to approximate their proportion with some general electric transmission loss factor. Balancing Authorities like LADWP measure the NEL at the plant bus bar and interties. Using NEL to calculate emissions intensity is preferred since NEL represents total electricity needed to serve the utility’s load.

E. Requesting Time Extensions (Chapter 3, Section A.2 – page 15)

¹ Elec. Mkt. Transparency Provisions of Section 220 of the Fed. Power Act, 143 F.E.R.C. P61,054, 61 (FERC 2013) citing Order No. 768, FERC Stats. & Regs. P 31,336 at P 156.

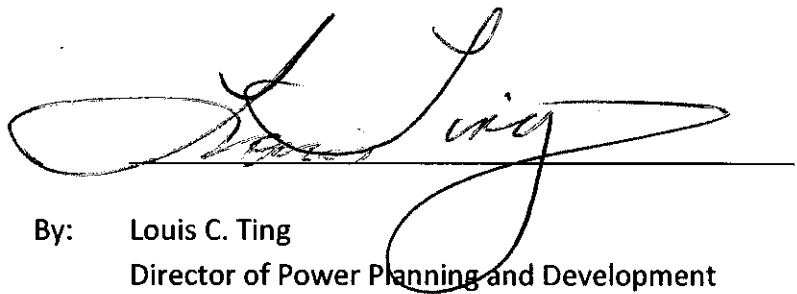
² 141 FERC ¶ 61,235 (Issued Dec. 20, 2012) n.15 citing Availability of E-Tag Information to Commission Staff, Notice of Proposed Rulemaking, FERC Stats. & Regs. ¶ 32,675 (2011) (E-Tag NOPR)(emphasis added).

- LADWP recommends including a provision for an additional 90 days' time extension to submit the IRP Filing. In order for the latest IRP (2018 IRP) to be submitted on or before the January 1, 2019 deadline, a grace period of 90 days is necessary due to an extensive Public Outreach Process in 2018, as well as processing Division Director approvals, General Manager approval, and Board approval of the document. In addition, this action by the Board will not become final until after five (5) meeting days of the Los Angeles City Council pursuant to City of Los Angeles Charter, Section 245, provided the City Council declines to consider the Board approval.
- F. Climate Change Adaptation – Cal-Adapt (Appendix E – page E-1 and Chapter 2, Section 2 – page 4)
- At this time, LADWP recommends that the requirement to utilize the Cal-Adapt Climate Change Adaptation tool be optional. LADWP's load forecast includes 1-in-2, 1-in-5, 1-in-10, and 1-in-40 weather events and is updated annually. The effects of climate change included in the Cal-Adapt tool are in beta version and not currently incorporated in the Load Forecast. LADWP remains open to requiring the use of a climate adaption tool when fully developed.

The LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-0239 or Ms. Pjoy T. Chua at (213) 367-1750.

Dated: June 14, 2017

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Louis C. Ting", is written over a horizontal line. The signature is fluid and cursive.

By: Louis C. Ting
Director of Power Planning and Development
Los Angeles Department of Water and Power
111 North Hope Street, Suite 921
Los Angeles, CA 90012
Telephone: (213) 367-0239
Email: Louis.Ting@ladwp.com