

DOCKETED

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Comment Received From: Ramon D. Gamez

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LADWP's Comments to DRAFT 2017 IEPR and Workshop

Additional submitted attachment is included below.

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

In the matter of:)	Docket No. 17-IEPR-01
)	
2017 Integrated Energy Policy Report (2017 IEPR))	COMMENTS TO DRAFT 2017
)	INTEGRATED ENERGY POLICY
)	REPORT AND WORKSHOP
)	
)	RE: Draft 2017 Integrated
)	Energy Policy Report

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION’S (CEC’s) WORKSHOP ON THE DRAFT 2017 INTEGRATED
ENERGY POLICY REPORT**

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit written comments on the October 23, 2017 Draft Integrated Energy Policy Report (IEPR) workshop hosted by the California Energy Commission (CEC) and the opportunity to provide feedback on the *2017 Draft Integrated Energy Policy Report* (IEPR).

The LADWP is a vertically-integrated publicly-owned electric utility of the City of Los Angeles, serving a population of over 4 million people within a 465 square mile service territory cover 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.

LADWP provides comments including the following key points:

I. Renewable Gas

LADWP supports the IEPR’s recommendation to “identify cost-effective strategies that are consistent with existing state policies and climate change goals by considering priority end uses of renewable gas.” The Draft 2017 IEPR states that additional policies may be needed, and agencies may also need to modify, reconfigure, and enhance regulations, policies and programs to fully enable cost-effective commercialization of renewable gas and maximize methane emissions reductions. On September 16, 2016, the Los Angeles City Council approved a Motion that instructed LADWP to study an equitable transition away from fossil fuels to powering Los Angeles with 100% clean energy. Renewable gas may be a pathway towards 100% clean energy, but without additional policies in place, such as aligning biogas and renewable hydrogen with

Renewable Portfolio Standards, the commercialization of renewable gas would not be enabled nor cost-effective.

II. Cap and Trade for Transportation Electrification

The Draft 2017 IEPR includes incentives to address GHG emissions and air pollution objectives through programs targeting the transportation sector. Such revenue from the sales of allowances under the Cap and Trade system will be appropriated to the Greenhouse Gas Reduction Fund for low-carbon transportation projects under California Air Resources Board (CARB). SB 350 recognizes and stipulates that Utilities should not be penalized for increased load and emissions attributed to promoting transportation electrification; however, CARB has yet to finalize a protocol or mechanism for providing GHG credits to Utilities for promoting transportation electrification. LADWP recommends a section in the 2017 IEPR to address this issue that is tied with Cap and Trade as well as CEC's Transportation Electrification calculator/tool.

III. California Energy Preliminary Demand Forecast, 2018-2028

LADWP appreciates the CEC's forecasts for light-duty EV consumption and also recommends including a forecast for total transportation electrification, including heavy duty EVs, electric buses, electric rails, ships, etc. since other electrification is a significant portion of transportation electrification and will increase electric sales and demand.

LADWP also recommends that the 2017 IEPR considers potential peak shift (utility-provided peak load moving to a later hour) in its Statewide Peak Demand Forecast. As increased amounts of solar are integrated onto the system, the net peak load (load minus variable energy resources) becomes a critically important aspect in the planning process.

IV. Draft Report Clarifications

LADWP provides a number of specific clarifying changes to the Draft Report as detailed below:

- Figure ES-3 and Figure 19, on page 10 and 99, respectively, indicates that LADWP's planned EIM entry is 2019; however, the realistic planned EIM entry for LADWP has been updated to 2020 due to an ongoing GAP analysis.
- Table 8 on page 103 indicates LADWP's proposed OTC compliance dates as follows:
 - Scattergood 1&2 – plans to repower by December 31, 2020
 - Haynes 1&2 – plans to repower by December 31, 2023
 - Harbor 5 – plans to repower by December 31, 2026
 - Haynes 8 – plans to repower by December 31, 2029

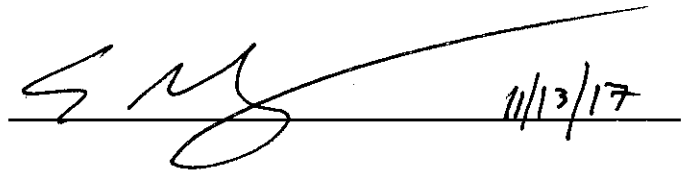
Due to an ongoing OTC Study, the proposed compliance dates have been delayed to the following:

- Scattergood 1&2 – plans to repower by December 31, 2024
- Haynes 1&2 – plans to repower by December 31, 2025
- Haynes 8 – plans to repower by December 31, 2028
- Harbor 5 – plans to repower by December 31, 2029

The LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-0642 or Ms. Sangeetha Losari at (213) 367-2315.

Dated: November 13, 2017

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'E. Montag', is written over a horizontal line. To the right of the signature, the date '11/13/17' is handwritten.

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