

DOCKETED

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Project Title:	Integrated Resource Plan
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Document Title:	LADWP's Comments - Proposed POU IRP Submission & Review Guidelines Revisions
Description:	LADWP's Comments on POU IRP Submission & Review Guidelines - Revised 2nd Edition - Track Changes Version
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**BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

In the matter of:) Docket No. 18-IRP-01
)
Publicly Owned Utility Integrated Resource) RE: CEC Proposed IRP Guidelines Revisions
Plan (IRP) Submission and Review Guidelines –)
Revised Second Edition – Track Changes)
Version)

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION (CEC) PROPOSED REVISIONS TO THE PUBLICLY OWNED
UTILITY INTEGRATED RESOURCE PLAN SUBMISSION AND REVIEW GUIDELINES (SECOND
EDITION)**

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Dated: September 21, 2018

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INTRODUCTION

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the proposed revisions to the Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines (Second Edition).

The LADWP is a publicly-owned water and electric utility of the City of Los Angeles, serving a population of over 4 million people within a 465 square mile service territory including the City of Los Angeles and portions of the Owens Valley. The LADWP’s mission is to provide reliable water and power in a safe, environmentally responsible, and cost-effective manner. LADWP is a vertically-integrated utility that generates and delivers electricity to customers. LADWP’s electricity supply comes from a diverse mix of generating resources that are located within the state of California as well as out-of-state resources located in Arizona, Nevada, Utah, Wyoming, Oregon, and Washington.

**SPECIFIC COMMENTS ON THE CEC STAFF PROPOSED REVISIONS TO THE POU IRP SUBMISSION
AND REVIEW GUIDELINE (SECOND EDITION)**

SB 350 states that each load serving entity shall file (and periodically update) an integrated resource plan (IRP) to “Meet the greenhouse gas emissions reduction targets established by the State Air Resources Board, in coordination with the commission and the Energy Commission, for the electricity sector and each load-serving entity that reflect the electricity sector’s percentage in achieving the economy wide greenhouse gas emissions reductions of 40 percent from 1990 levels by 2030”.

LADWP reiterates that the purpose of the Integrated Resource Plan (IRP) process is not to impose an enforceable or otherwise binding GHG emission reduction requirement on the electricity sector in general or any load serving entity (LSE) specifically. Rather, the IRP process is intended to serve a planning function to achieve the 50 percent Renewable Portfolio Standard (RPS) by 2030 and ensure the electric sector is on track to help California achieve its 2030 statewide GHG emission reduction target while meeting customer resource needs, maintaining reliable electric service, and reasonable customer rates.

With regard to the GHG target to be developed for each LSE, LADWP reiterates that each target should be a non-binding planning target range that is:

- A realistic and achievable estimate of potential future GHG emission levels based on each LSE’s load forecast, portfolio of generating resources, and known commitments.
- Expressed as a range to allow for uncertainty in predicting what the demand for electricity, portfolio of generating resources and GHG emissions will be 10 years in the future.
- Flexible enough to allow room for load growth due to electrification of various other emission sources in California (such as ports, vehicles, and industrial equipment).
- Adjustable to account for uncertainty in the extent to which electrification within the LSE’s service territory will affect GHG emissions.

With respect to the requirement to provide projected annual energy sold into short-term and spot markets, LADWP requests this information to be optional. LADWP does not model short-term transactions over the modeling horizon contemplated by the IRP. LADWP's IRP reflects its intent to be self-sufficient without relying on the market and short-term marketing transactions are only conducted in real time for economic opportunities. Such transactions would be nearly impossible to anticipate, forecast, and model over long-term planning horizons.

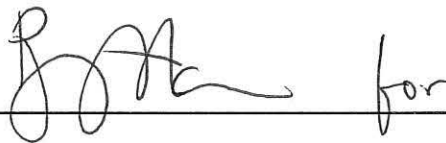
LADWP supports the option to manually enter GHG emissions for each year in the GHG Emissions Accounting Table (GEAT).

While LADWP understands that the framework of regulations is constantly changing, LADWP requests that further changes to the IRP Submission and Review Guidelines be incorporated into the next IRP submission cycle or incorporated as an Addendum. LADWP's Board approval process is lengthy and continuous updates to the IRP Submission and Review Guidelines will cause interruptions to the IRP approval and submission process, potentially delaying the submittal. Such updates should have a process to be included that does not interrupt the Board Approval process.

CONCLUSION

In closing, LADWP appreciates the opportunity to participate in this commenting process regarding the proposed revisions to the Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines (Second Edition). LADWP looks forward to continue working with the California Energy Commission to help shape effective regulations that will benefit the health, safety, and security of all California residents.

Respectfully Submitted,



A handwritten signature in black ink, appearing to read 'SZ' followed by a flourish, is written above a horizontal line. To the right of the signature, the word 'for' is written in a cursive script.

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