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Submitted On: 11/27/2019
Docket Number: 19-IEPR-01*

19-IEPR-01 LADWP's Comments on the DRAFT 2019 Integrated Energy Policy Report

Additional submitted attachment is included below.

BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA

In the matter of:

*Draft 2019 Integrated Energy Policy Report
(2019 IEPR)*

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Docket No. 19-IEPR-01

COMMENTS ON THE DRAFT 2019 IEPR

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION (CEC) ON THE DRAFT 2019 INTEGRATED ENERGY POLICY
REPORT (2019 IEPR)**

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Dated: November 27, 2019

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

<i>In the matter of:</i>)	Docket No. 19-IEPR-01
<i>Draft 2019 Integrated Energy Policy Report (2019 IEPR)</i>)	COMMENTS ON THE DRAFT 2019 IEPR
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION (CEC) ON THE DRAFT 2019 INTEGRATED ENERGY POLICY
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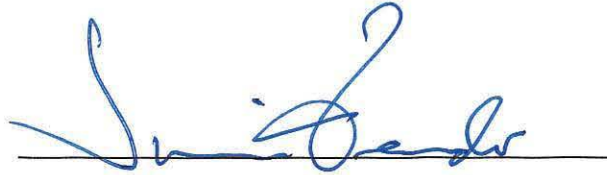
The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review and submit written comments regarding the Draft 2019 Integrated Energy Policy Report (2019 IEPR).

The City of Los Angeles (City of LA) is a municipal corporation and charter city organized under the provisions set forth in the California Constitution. LADWP is a proprietary department of the City of LA, pursuant to the Los Angeles City Charter, whose governing structure includes a mayor, a fifteen-member City Council, and a five-member Board of Water and Power Commissioners. LADWP is the third largest electric utility in the state, one of five California Balancing Authorities, and the nation’s largest municipal utility, serving a population of over four million people within a 465 square mile service territory that covers the City of Los Angeles and portions of the Owens Valley. LADWP’s mission is to provide clean, reliable water and power in a safe, environmentally responsible, and cost-effective manner.

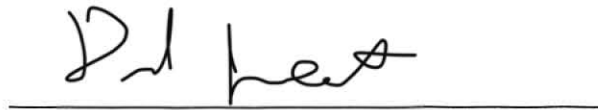
The LADWP applauds the California Energy Commission (CEC) for undertaking many of the State’s energy driven decarbonization efforts as outlined in the Draft 2019 Integrated Energy Policy Report (2019 IEPR). With respect to these efforts, the draft 2019 IEPR offers a very brief discussion regarding cost effectiveness of these efforts, which is one of the major tenets of the Warren-Alquist Act. LADWP is concerned that there may be a disconnect between the cost-effectiveness requirements of the Warren-Alquist Act and the potential cost impacts on electric rates in the future resulting from a full implementation of the 2019 IEPR. LADWP believes it is in the best interests of the State’s policy objectives around Decarbonization to resolve this disconnect. LADWP recommends further consideration and study into potential implications to electric costs as the combined effects of GHG reduction measures in the electric, transportation and building sectors leading into rapid and major grid infrastructure upgrades to keep up with system reliability that will undoubtedly affect electric rates to consumers in the future.

The LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-2525, or Mr. Scott Hirashima at (213)367-0852.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Simon Zewdu', written over a horizontal line.

By: Simon Zewdu
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