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

<i>In the matter of:</i>)	Docket No. 24-IEPR-02
)	
<i>2024 Integrated Energy Policy Report Update (2024 IEPR)</i>)	RE: Forms and Instructions for Submitting Electricity Resource Plan Information
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE
CALIFORNIA ENERGY COMMISSION ON THE NOTICE OF MAY 8, 2024, STAFF WORKSHOP ON
FORMS AND INSTRUCTIONS TO COLLECT ELECTRICITY RESOURCE PLAN DATA FROM LOAD-
SERVING ENTITIES**

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Date: May 22, 2024

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OF THE STATE OF CALIFORNIA**

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INTRODUCTION

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review and submit written comments regarding the Draft 2024 Integrated Energy Policy Report (IEPR) Forms and Instructions for Submitting Electricity Resource Plans (Supply Forms) and Transmission Information (T-1 Forms) to prepare the 2025 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.

SPECIFIC COMMENTS

LADWP provides the following preliminary comments on the Draft 2024 IEPR Forms and Instructions for Submitting Supply Forms and T-1 Forms, as discussed during the May 8, 2024, IEPR workshop and detailed in the draft reporting forms and instructions.

LADWP understands and appreciates the CEC's ongoing efforts to enhance the accuracy and comprehensiveness of IEPR data reporting, specifically the 2024 Supply and T-1 Forms. However, the proposed changes in submitting the 2024 Supply Forms and T-1 Forms present significant challenges that LADWP believes have not been sufficiently justified or considered in terms of their potential burden on utilities.

Regarding the increased reporting frequency, the shift from biennial to annual reporting represents an increase in the reporting workload for LADWP. This change requires additional resources to collect, verify, and submit data more frequently. Annual reporting could lead to redundancies and inefficiencies without providing benefits in terms of data accuracy or effectiveness.

Regarding the detailed transmission project information, the requirement to include detailed information on transmission projects, as outlined in the new T-1 Forms, poses significant challenges. The proposed 2024 reporting requirements demand a much greater level of time and personnel resources compared to the level of detail requested in 2022. This includes detailed documentation that may not be readily available or easy to compile by the reporting due date. The rationale for such detailed reporting was not clearly articulated, and it seems excessive given the previous reporting standards.

Regarding the instruction clarifications and additions, LADWP appreciates the effort to clarify instructions regarding reporting items, such as the adjustable Planning Reserve Margin, energy service providers, and long-term system power contracts. However, the inclusion of new elements like the Queue Number and the expanded technology subtypes list introduces additional complexity. While these changes may enhance data granularity, they also increase the reporting burden. Clear and detailed instructions, along with ample time for implementation, will be crucial for LADWP to comply effectively without significant disruption to its operations.

In summary, while LADWP supports the CEC's goals of improving IEPR data reporting, LADWP urges the CEC to reconsider the proposed changes considering their potential administrative burden and additional resource commitment needed to provide the information. Considering the challenges mentioned above, LADWP proposes the following recommendations:

1. **Maintain Biennial Reporting Schedule:** Given the substantial increase in administrative burden associated with annual reporting, LADWP recommends maintaining the biennial reporting schedule. This approach will help alleviate the strain on utilities while still providing valuable data for policy and planning purposes.
2. **Reevaluate Detailed Transmission Project Information Requirements:** The extensive information required for transmission projects, as outlined in the new T-1 Forms, may be burdensome for utilities to compile by the due date. LADWP suggests considering alternative sources of data. Specifically, LADWP recommends utilizing publicly available documents, such as LADWP's Integrated Resource Plan (IRP), Strategic Long-Term Resource Plan (SLTRP), and the entities' Oasis website, to obtain transmission-related information.

3. Consider Incremental Benefit of Annual Reporting: LADWP believes that the incremental benefit of transitioning to annual reporting may not justify the increased administrative burden. The differences in data accuracy between biennial and annual reporting may not be significant over a one-year reporting period. Therefore, LADWP recommends conducting a thorough analysis to assess the incremental benefit of annual reporting and weigh it against the associated costs and burdens for utilities.

LADWP welcomes the opportunity to discuss these comments and recommendations further and collaborate on finding solutions that meet the CEC's objectives without imposing strain on utilities.

LADWP appreciates the opportunity to submit these comments. If you have any questions, please contact myself at (213) 367-4631, or Mr. Rockeish Mckenzie at (213) 367-4341.

Dated: May 22, 2024

Respectfully Submitted,

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