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<b>Project Title:</b>	Rulemaking to Amend Regulations Governing the Power Source Disclosure Program
<b>TN #:</b>	260903
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*Comment Received From: LADWP  
Submitted On: 1/6/2025  
Docket Number: 21-OIR-01*

**on Proposed Amendments to the PSD Program Regulations (15-Day Updated Language)**

*Additional submitted attachment is included below.*

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

In the matter of:	)	Docket No. 21-OIR-01
	)	
Rulemaking to Amend Regulations	)	RE: Revised Notice of Availability and
Governing the Power Source Disclosure	)	Opportunity to Comment - 15-Day
Program	)	Updated Language
_____	)	

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER  
TO THE CALIFORNIA ENERGY COMMISSION REGARDING  
RULEMAKING TO AMEND REGULATIONS GOVERNING THE POWER SOURCE DISCLOSURE  
PROGRAM 15-DAY UPDATED LANGUAGE**

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Dated: January 3, 2025

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

In the matter of:	)	Docket No. 21-OIR-01
	)	
Rulemaking to Amend Regulations	)	RE: Revised Notice of Availability and
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER  
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PROGRAM 15-DAY UPDATED LANGUAGE**

**INTRODUCTION**

The City of Los Angeles (City of LA) is a municipal corporation and charter city organized under the provisions set forth in the State of California (State) Constitution. The Los Angeles Department of Water and Power (LADWP) is a proprietary department of the City of Los Angeles (LA), pursuant to the Los Angeles City Charter, whose governing structure includes a Mayor, a City Council, and a 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 478 square mile service territory that covers the City of LA and portions of the Owens Valley. LADWP supports the growth and vitality of the City of LA, its residents, businesses, and the communities we serve, and provides safe, reliable, and cost-effective water and power in a customer-focused and environmentally responsible manner.

LADWP appreciates the opportunity to provide specific comments on the California Energy Commission’s (Commission) December 9, 2024, proposed revisions to the regulations governing the Power Source Disclosure Program (*15-Day Updated Language*). In addition, LADWP is providing feedback on the draft reporting templates docketed on November 22, 2024.

## SPECIFIC COMMENTS

### 1. Commission staff should clarify its intended implementation timeline for adding California total loss-adjusted load information to the Power Content Label (PCL).

In Section 1393.1(a)(3) of the *15-Day Updated Language*, Commission staff propose the following revision:

*“(3) The Energy Commission shall provide fuel mix and GHG emissions intensity of ~~California’s total statewide retail electricity sales total~~ California loss-adjusted load for inclusion on the power content label. Beginning January 1, 2026, the Energy Commission shall instead provide the fuel mix and GHG emissions intensity of California’s total loss-adjusted load for inclusion on the power content label.”*

It is unclear if the revised language adds California total loss-adjusted load information to the PCL immediately upon the effective date of the amended regulations or beginning in 2026. Commission staff should provide clarification. However, an additional 15-Day Language proposal is not necessary. LADWP believes that a regulatory advisory document or other documented form of guidance would be sufficient.

### 2. Commission staff should clarify the initial reporting year for the new reporting requirements.

It is unclear whether the 2026 and 2028 implementation dates in the *15-Day Updated Language* refer to the reporting year or the data year. For instance, Section 1393(a)(3) states, “[b]eginning January 1, 2028, retail suppliers shall report the data... for each hour of the year.” This could be interpreted to mean either that a) hourly reporting shall start with the 2028 submittal using 2027 calendar year data, or b) hourly reporting shall start with the 2029 submittal using 2028 calendar year data. LADWP suggests Commission staff should clarify the initial reporting year for the new reporting requirements in a separate advisory document or other form of documented guidance.

### 3. LADWP encourages Commission staff to continue collaborating with stakeholders on the development of reporting tools for the new hourly reporting requirements.

LADWP appreciates that Commission staff have published draft reporting templates for stakeholder feedback. LADWP encourages Commission staff to continue working with stakeholders on the development of these templates and any other reporting tools that may follow.

The latest proposed reporting templates are reliant on manual data entry and validation from the retail supplier. This approach may be sufficient for reporting annual data. However, LADWP is concerned that it will be overly burdensome if used for the hourly reporting requirements beginning in 2028. The new hourly reporting requirements represent a substantial increase in the volume of data required from retail suppliers. As such, the tools for hourly reporting should

allow the user to import data instead of entering it manually. As a short-term solution, Commission staff should consider working with stakeholders to identify and implement formatting changes to the hourly reporting template that would allow for generation data to be imported more easily. As a longer-term solution, Commission staff should consider developing an online data submission portal similar to Renewable Portfolio Standard (RPS) Online used for RPS reporting.

**4. LADWP supports Commission staff's proposal to annually publish the underlying calculations for the default loss factors.**

LADWP supports the language proposed under Section 1392(a)(8)(B) of the *15-Day Updated Language*. Publishing the underlying calculations for the default loss factors will allow reporting entities to provide Commission staff with more specific feedback during the implementation of transmission and distribution loss reporting. LADWP encourages Commission staff to continue working with stakeholders to refine the loss calculation methodology.

**5. LADWP supports the proposed footnote clarifying that the PCL does not reflect RPS compliance.**

LADWP supports including the footnote clarifying that the label does not reflect RPS compliance as proposed under Section 1393.1 (l)(1) of the *15-Day Updated Language*. This footnote will be especially important when loss-adjusted load information is added to the label.

**6. LADWP supports the proposed footnote regarding which emissions are excluded.**

LADWP supports the language for the excluded emissions footnote as proposed in Section 1393.1(l)(2) of the *15-Day Updated Language*. With the addition of "grandfathered imports of firmed-and-shaped energy", this proposed footnote now provides an accurate high-level description of emissions excluded from the label.

## **CONCLUSION**

LADWP appreciates the opportunity to participate in this rulemaking process and looks forward to working with the Commission to help shape appropriate and effective regulations that will benefit the health, safety, and security of all California residents. If you have any questions, please contact Silvia Lozano at (213) 367-0787 or Alex Geronilla at (213) 367-8082.

Dated: January 3, 2025

Respectfully Submitted,

**Silvia Lozano**

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