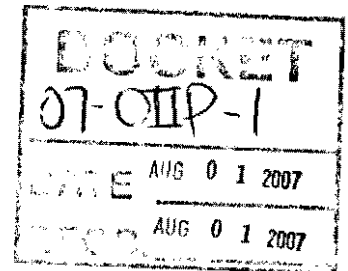


**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive
Framework and to Examine the Integration of
Greenhouse Gas Emissions Standards into
Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of:

AB 32 Implementation: Greenhouse Gases

Docket 07-OIP-01

**DATA RESPONSE AND COMMENTS OF THE
LOS ANGELES DEPARTMENT OF WATER AND POWER
ON THE JOINT CPUC/CEC STAFF REQUEST FOR INFORMATION ON
CURRENT ENTITY-SPECIFIC GREENHOUSE GAS EMISSIONS LEVELS**

August 1, 2007

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**DATA RESPONSE AND COMMENTS OF
THE LOS ANGELES DEPARTMENT OF WATER AND POWER
ON THE JOINT CPUC/CEC STAFF REQUEST FOR INFORMATION ON
CURRENT ENTITY-SPECIFIC GREENHOUSE GAS EMISSIONS LEVELS**

In accordance with Rule 14 of the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC" or "Commission") of the State of California, the Los Angeles Department of Water and Power ("LADWP") hereby files the following Data Response and Comments on the *"Joint California Public Utilities Commission and California Energy Commission Staff Request for Information on Current Entity-Specific Greenhouse Gas (GHG) Emissions Levels"* ("Data Request") filed July 17, 2007, in CPUC Rulemaking R.06-04-009 ("Rulemaking") and CEC Docket # 07-OIIP-1.

I. INTRODUCTION

The LADWP appreciates the opportunity to review and comment on the CPUC/CEC staff's "bottom-up" entity specific inventory for 2004 and 2005 and computed emissions for individual facilities. We have reviewed the data for LADWP generating resources, including Harbor, Haynes, Scattergood, Valley, Intermountain and Navajo Generating Stations.

II. SUMMARY OF KEY COMMENTS

A. *Fuel specific emission factors should be used in place of generic emission factors.*

LADWP recommends using fuel specific emission factors for more accuracy when calculating CO₂ emissions from fuel data. In the 2004 & 2005 EIA fuel and CO₂ emissions data provided by the CPUC/CEC for review, LADWP observed that a generic "utility coal" emission factor was used to calculate CO₂ emissions from different types of coal (bituminous and sub bituminous). Specific emission factors for the different types

of coal are available from the California Climate Action Registry (Registry) Power/Utility Reporting Protocol, which is the standard greenhouse gas (GHG) emission reporting protocol that California electric utilities have been using for the past several years.

LADWP recommends using the fuel-specific emission factors from the Registry's Power/Utility Reporting Protocol (April 2005) for calculating 2004 & 2005 current entity specific GHG emissions. The origin of these emission factors is well documented in the reporting protocol (pages 24-25). Updated emission factors should be used if available.

Table 5.1 Default CO2 Emission Factors

Fossil Fuel	Emission Factor (kg CO2/MMBtu)
Anthracite Coal	103.61
Bituminous Coal	93.50
Sub bituminous Coal	97.12
Lignite Coal	96.61
Coke	102.11
Natural Gas	53.05
Distillate Oil	73.14
Residual Oil	78.78
Kerosene	72.30
Petroleum Coke	102.11
LPG	62.99
Ethane	59.60
Propane	63.04
Isobutane	65.08
n-Butane	64.97
Geothermal	n.a.
Wood – dry	90.94
Landfill gas	52.07
Wastewater treatment biogas	52.07

Source: California Climate Action Registry Power/Utility Reporting Protocol, page 22.

For consistency, a single set of emission factors should be adopted for calculating all GHG emissions related to AB32. This would include the 1990-2005 California statewide GHG emissions inventory, "current" entity specific emissions, and

future emission reporting for AB32 compliance. The California Registry GHG emission reporting protocols and emission factors are already in use in California, and similar protocols and factors would likely be adopted by the multi-state Climate Registry.

To improve the accuracy of the 1990 California emissions baseline and statewide GHG emissions inventory, LADWP recommends changing the emission factors used to more specific factors such as those in the Registry reporting protocols.

B. *Methodologies and emission factors used for current emissions calculations should be consistent with those used for the 1990 GHG emissions inventory baseline and future compliance reporting under AB 32.*

The methodology and emission factors used to calculate “current entity-specific” emissions should be consistent with the 1990 baseline and future compliance reporting. Specifically, the calculation method and emission factors used for the 1990 baseline, current emissions, and future compliance reporting should be the same to ensure an apples-to-apples comparison between these three critical aspects of AB32 compliance.

California’s statewide GHG emissions inventory and 1990 baseline are based on fuel data. Therefore, reporting current emissions and 2008-2020 emissions using a fuel-based method would be consistent. However, reporting current and 2008-2020 CO₂ emissions using CEMS data would not be comparable or consistent with California’s 1990 baseline, unless the 1990 baseline was adjusted to correct for the differences between CEMS and fuel based CO₂ calculation methods as described below. LADWP has found that CEMS CO₂ data for Intermountain and Navajo Generating Stations is significantly higher (11 – 12%) relative to fuel-based CO₂ calculation methods, and we suspect this variation would be observed at other coal-fired generating stations as well.

Adopting a standard emissions calculation method and emission factors for each fuel type is necessary to ensure that a ton of emissions reported by one facility is the same as a ton of emissions reported by another facility. Using different methods to calculate emissions would create artificial differences between facilities, and make it difficult to allocate emission allowances based on reported emissions. For example, if one coal generating station reported emissions using CEMS and another reported emissions based on fuel burned, there could be as much as a 12% discrepancy between the two facilities due to the calculation method alone. LADWP recommends that the state collect fuel and CEMS data for all in-state and out-of-state generating facilities providing power to California, evaluate the differences between CEMS and fuel-based calculation methods, and determine which method is the most accurate and consistent for reporting GHG emissions. Until the discrepancy is resolved, LADWP recommends that fuel data be reported in addition to CEMS data for all facilities.

C. *Emissions should be calculated based on actual MWh received and not based on ownership share.*

For jointly owned generating stations, it is more accurate to report each participant's share of emissions based on actual MWh received/total facility net generation rather than based on ownership/entitlement share. Actual MWh received by each participant is different from the value obtained by multiplying each participant's entitlement percentage by the total monthly or annual output of the plant for the following reasons:

- 1) Energy for each participant is scheduled 1 hour ahead based on expected plant output. Each participant can request up to their maximum entitlement share of the expected plant output for each hour. Any difference (surplus or deficit) between what the participants schedule and the actual plant output is absorbed by the operating agent.

- 2) Each participant's account is rounded to the nearest MWh on an hourly basis. This is the primary reason for the difference between the actual MWh received compared to multiplying each participant's entitlement percentage by the total plant monthly or annual output.

Differences in actual MWh received versus entitlement share can be more pronounced for the utility serving as operating agent, because the operating agent absorbs any differences between actual plant output and what is scheduled by the other participants. Reporting based on straight ownership/entitlement percentage results in either under-reporting or over-reporting each participant's share of emissions compared to the energy they actually received. In addition, reporting based on actual MWh received is consistent with the methodology for reporting emissions from purchased power.

III. DATA RESPONSE: CORRECTIONS TO 2004 & 2005 EIA DATA

The LADWP requests revisions to the CPUC/CEC data files in order to make the data more complete and accurate for plant-specific emissions. As requested, LADWP has provided justification for each revision as reflected in Tables 1 (2004 EIA Data) and Table 2 (2005 EIA Data) below.

Fuel and generation data used to calculate "current entity-specific" emissions should be as accurate as possible. Since the EIA 906 report is submitted monthly, any subsequent corrections to the fuel or generation data likely would not be reflected in the EIA database. Data from final plant operation reports would include any corrections and therefore would be more accurate on an annual basis.

LADWP reviewed the 2004 & 2005 EIA data provided by Energy Commission staff for Harbor, Haynes, Scattergood, Valley, Intermountain and Navajo Generating

Stations, and identified the following corrections based on fuel and generation data from annual plant operation reports.

Table 1: Corrections to 2004 EIA Data

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
2	Calif In-State Summary	D21 J21 M21	3.03	3.05	Update summary with corrections to Los Angeles CO2 emissions from Tab 5 "Calif Utilities Plant Levels".
3	Calif Out-of-State Summary	J7	12.67	12.86	Update summary with corrections to Tab 14, Intermountain Power Plant, California Imported CO2 emissions.
3	Calif Out-of-State Summary	J10	3.55	3.52	Update summary with corrections to Tab 14, Navajo Power Plant, California Imported CO2 emissions.
4	Calif Utilities Summary	D12 G12	3.03	3.05	Update summary with corrections to Los Angeles CO2 emissions from Tab 5 "Calif Utilities Plant Levels".
5	Calif Utilities Plant Level	K23 L23	21,852,487	21,879,678	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	K24 L24	17,102,439	17,102,435	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	K25 L25	14,110,227	14,110,418	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	K27 L27	2,636,009	2,645,069	Replace EIA data with Digester Gas billing meter data (more accurate).
5	Calif Utilities Plant Level	M22 N22	3,376,476	3,387,586	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	M23 N23	22,242,867	22,309,007	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	M24 N24	17,435,058	17,622,550	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	M25 N25	14,392,432	14,486,497	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	M27 N27	1,672,508	1,699,859	Replace EIA data with MMBtu calculated from monthly Digester Gas billing meter data and heating values (more accurate).
5	Calif Utilities Plant Level	O22	356,885	347,895	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	O24	1,598,149	1,588,188	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
5	Calif Utilities Plant Level	O25	1,975,076	1,974,185	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif Utilities Plant Level	O27	143,235	153,196	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.
5	Calif Utilities Plant Level	P20	3.03	3.05	Update total CO2 emissions for Los Angeles plants due to corrections.
5	Calif Utilities Plant Level	P23	1.17	1.18	Recalculate CO2 emissions using corrected MMBtu data.
5	Calif Utilities Plant Level	P24	0.92	0.93	Recalculate CO2 emissions using corrected MMBtu data.
6	Calif NG	K394 L394	21,852,487	21,879,678	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	K395 L395	17,102,439	17,102,435	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	K396 L396	14,110,227	14,110,418	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	M393 N393	3,376,476	3,387,586	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	M394 N394	22,242,667	22,309,007	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	M395 N395	17,435,058	17,622,550	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	M396 N396	14,392,432	14,486,497	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	O393	356,885	347,895	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	O395	1,598,149	1,588,188	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	O396	1,975,076	1,974,185	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	P392	3.03	3.05	Update total CO2 emissions for Los Angeles plants due to corrections.
6	Calif NG	P394	1.17	1.18	Recalculate CO2 emissions using corrected MMBtu data.
6	Calif NG	P395	0.92	0.93	Recalculate CO2 emissions using corrected MMBtu data.
11	Calif Other	K35 L35	2,636,009	2,645,069	Replace EIA data with Digester Gas billing meter data (more accurate).

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
11	Calif Other	M35 N35	1,672,508	1,699,859	Replace EIA data with MMBtu calculated from monthly Digester Gas billing meter data and heating values (more accurate).
11	Calif Other	O35	143,235	153,196	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.
11	Calif Other	P35	0.09	0.00	Digester gas is considered carbon neutral, therefore CO2 emissions = 0
12	Calif Non Carbon	K121 L121	2,636,009	2,645,069	Replace EIA data with Digester Gas billing meter data (more accurate).
12	Calif Non Carbon	M121 N121	1,672,508	1,699,859	Replace EIA data with MMBtu calculated from monthly Digester Gas billing meter data and heating values (more accurate).
12	Calif Non Carbon	O121	143,235	153,196	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.
14	Out of State Details	T10 AF10	524,069	514,113	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	U10 AG10	445,635	393,896	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	V10 AH10	282,117	218,604	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	W10 AI10	449,759	451,623	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	X10 AJ10	509,571	511,682	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	Y10 AK10	526,891	505,137	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	Z10 AL10	532,973	511,280	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	AA10 AM10	533,467	500,805	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	AB10 AN10	521,961	489,288	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	AC10 AO10	547,891	515,551	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	AD10 AP10	545,996	513,164	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	AE10 AQ10	576,467	482,604	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out of State Details	AB11 AN11	685	678	Replace EIA data with final corrected diesel data from Intermountain Annual Production Report.
14	Out of State Details	AE11 AQ11	760	745	Replace EIA data with final corrected diesel data from Intermountain Annual Production Report.
14	Out of State Details	Add T12 AF12		12,127	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add U12 AG12		53,585	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add V12 AH12		64,682	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add Z12 AL12		22,106	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add AA12 AM12		33,076	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add AB12 AN12		33,078	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add AC12 AO12		32,765	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add AD12 AP12		33,255	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).
14	Out of State Details	Add AE12 AQ12		94,310	Add sub bituminous coal burned from purchase records (originally not included in EIA 906 reports).

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	BD10 BP10	12,053,587	11,958,549	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BE10 BQ10	10,249,605	9,057,440	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BF10 BR10	6,488,691	5,390,960	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BG10 BS10	10,344,457	10,623,979	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BH10 BT10	11,720,133	12,231,247	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BI10 BU10	12,118,493	12,127,329	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BJ10 BV10	12,791,352	12,137,070	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BK10 BW10	12,803,208	11,821,232	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	BL10 BX10	12,527,064	11,386,945	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BM10 BY10	13,149,384	11,822,056	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BN10 BZ10	13,103,904	11,290,259	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BO10 CA10	13,835,208	10,664,608	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out of State Details	BD11 BP11	1,195	1,197	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BE11 BQ11	9,674	9,690	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BF11 BR11	6,658	6,665	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BG11 BS11	8,184	8,263	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BH11 BT11	4,797	4,823	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BI11 BU11	1,914	1,916	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BJ11 BV11	3,579	3,570	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	BK11 BW11	4,611	4,575	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BL11 BX11	3,973	3,929	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BM11 BY11	2,291	2,284	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BN11 BZ11	5,672	5,650	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	BO11 CA11	4,560	4,354	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out of State Details	Add BD12 BP12		223,907	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BE12 BQ12		989,403	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BF12 BR12		1,194,306	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BJ12 BV12		408,169	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BK12 BW12		610,721	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BL12 BX12		610,757	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BM12 BY12		604,978	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BN12 BZ12		614,026	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	Add BO12 CA12		1,741,351	Add MMBtu from sub bituminous coal (originally not included in EIA 906 report).
14	Out of State Details	CJ10 CJ11	1,256,989 412	Total should be 1,257,391	Replace EIA data with generation data from Intermountain Generating Station Annual Production Report.
14	Out of State Details	CL10 CL11	1,246,657 592	Total should be 1,247,252	Replace EIA data with generation data from Intermountain Generating Station Annual Production Report.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	CN10 CO10 R47 S47	5,996,797	5,607,747	Recalculate Intermountain Total Fuel Consumption using corrected monthly coal data.
14	Out of State Details	CN11 CO11 R48 S48	9,820	9,798	Recalculate Intermountain Total Fuel Consumption using corrected monthly diesel data.
14	Out of State Details	Add CN12 CO12 R49 S49		378,984	Add Intermountain Total Fuel Consumption from sub bituminous coal.
14	Out of State Details	CP10 CQ10 T47 U47	141,185,086	130,511,674	Recalculate Intermountain Total MMBtus using corrected monthly coal MMBtu data.
14	Out of State Details	CP11 CQ11 T48 U48	57,108	56,916	Recalculate Intermountain Total MMBtus using corrected monthly diesel MMBtu data.
14	Out of State Details	Add CP12 CQ12 T49 U49		6,997,618	Add Intermountain Total MMBtus from sub bituminous coal burned.
14	Out of State Details	CQ9 U46	141,242,194	137,566,208	Recalculate Intermountain Total MMBtus using corrected coal and diesel MMBtu data and add sub bituminous coal MMBtu.
14	Out of State Details	CR9 V46	14,435,278	14,435,271	Recalculate Intermountain Total Net Generation using corrected monthly generation data.
14	Out of State Details	CT9 CU9	13,118,000 90.9%	14,406,145 99.80%	Replace California Consumption estimate with total MWH received by California participants based on Intermountain monthly energy accounting reports, and recalculate percentage.
14	Out of State Details	T23 AF23	738,096	735,204	Replace EIA data with correct fuel data from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	V23 AH23	531,245	531,254	Replace EIA data with correct fuel data from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	X23 AJ23	1,749	1,479	Replace EIA data with correct fuel data from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	BD23 BP23	16,176,112	16,123,024	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	BF23 BR23	11,631,078	11,631,275	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	BO23 CA23	16,202,164	15,984,171	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	BH24 BT24	10,212	8,631	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	BO24 CA24	15,114	14,720	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CB23 CB24	1,608,633 360	Total should be 1,622,490	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CC23 CC24	1,003,595 174	Total should be 1,017,880	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CD23 CD24	1,145,274 3,098	Total should be 1,171,210	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CE23 CE24	1,529,254 568	Total should be 1,576,070	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CF23 CF24	1,578,823 885	Total should be 1,629,720	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CG23 CG24	1,566,033 987	Total should be 1,616,040	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CH23 CH24	1,518,345 2,049	Total should be 1,567,090	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CI23 CI24	1,535,257 1,619	Total should be 1,587,890	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CJ23 CJ24	1,558,961 193	Total should be 1,608,130	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CK23 CK24	1,529,213 1,636	Total should be 1,580,220	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CL23 CL24	1,540,217 643	Total should be 1,590,240	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CM23 CM24	1,607,083 1,290	Total should be 1,658,740	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out of State Details	CN23 CO23 R59 S59	8,203,345	8,200,462	Recalculate Navajo Total Fuel Consumption using corrected monthly coal data.
14	Out of State Details	CN24 CO24 R60 S60	26,741	26,471	Recalculate Navajo Total Fuel Consumption using corrected monthly diesel data.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	CP23 CQ23 T59 U59	179,015,161	178,744,275	Recalculate Navajo Total MMBtus using corrected monthly coal MMBtu data.
14	Out of State Details	CP24 CQ24 T60 U60	156,521	154,546	Recalculate Navajo Total MMBtus using corrected monthly diesel MMBtu data.
14	Out of State Details	CQ22 U58	179,171,682	178,898,821	Recalculate Navajo Total MMBtus using corrected coal and diesel MMBtu data.
14	Out of State Details	CR22 V58	17,734,190	18,225,720	Recalculate Navajo Total Net Generation using corrected monthly generation data.
14	Out of State Details	CT22 CU22	3,611,000 20.4%	3,839,451 21.07%	Replace California Consumption estimate with actual MWH LADWP received from Navajo based on energy accounting records, and recalculate percentage.
14	Out of State Details	X46	13,852,000 96.0%	14,406,145 99.80%	Replace California Consumption estimate with total MWH received by California participants based on Intermountain monthly energy accounting reports, and recalculate percentage.
14	Out of State Details	Z47 Z48	9,785 9,534	9,530	Recalculate Plant Heat Rate using corrected MMBtu and MWH data.
14	Out of State Details	AA47 AA48 Add AA49	13.20 0.00	12.20 0.00 0.68	Recalculate Total CO2 Emissions using corrected MMBtu data and fuel-specific emission factors from the CCAR Power/Utility Protocol.
14	Out of State Details	AB46	12.67	12.86	Recalculate California Imported CO2 emissions using corrected California Percent of Generation.
14	Out of State Details	AC47 AC48	2,017 1,523	1,968	Recalculate lbs CO2/MWh factor using revised plant generation and Total CO2 emissions.
14	Out of State Details	X58 Y58	3,757,000 21.2%	3,839,451 21.07%	Replace California Consumption estimate with actual MWH LADWP received from Navajo based on energy accounting records, and recalculate percentage.
14	Out of State Details	Z59 Z60	10,102 11,592	9,816	Recalculate Plant Heat Rate using corrected MMBtu and MWH data.
14	Out of State Details	AA59 AA60	16.74 0.01	16.71 0.01	Recalculate Total CO2 Emissions using corrected MMBtu data and fuel-specific emission factors from the CCAR Power/Utility Protocol.
14	Out of State Details	AB58	3.55	3.52	Recalculate California Imported CO2 emissions using corrected California Percent of Generation.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out of State Details	AC59 AC60	2,082 1,852	2,023	Recalculate lbs CO2/MWh factor using revised plant generation and Total CO2 emissions.
14	Out of State Details	Row 121		Row 121 should not be included.	Intermountain emissions were already accounted for under specific imported energy, therefore these emissions should not be counted again for calculating the emission factor for generic imported electricity.
14	Out of State Details	R125 S125 T125 U125 V125	239,872 239,872 5,647,403 5,647,403 577,172	11,973 11,973 275,019 275,019 28,859	Only 0.2% of Intermountain Power Project (Non-Calif portion) should be factored into the generic imported electricity emission factor instead of 4%. Intermountain Energy Accounting Reports show that 99.8% of MWh went to California participants in 2004. Also need to use corrected fuel, MMBtu and generation data.

Table 2: Corrections to 2005 EIA Data

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
2	Calif In-State Summary	K9 M9	0.08 6.45	0.00 6.36	Digester gas is considered carbon neutral, therefore CO2 emissions should be = 0. Subtract 0.08 from Utility sector total emissions.
3	Calif Out-of-State Summary	E8	LADWP	All California participants	Tab 14, Intermountain Power Plant (Ownership Interest) California Percent of Generation (74.94%) represents the entitlement share for all California participants, not just LADWP.
3	Calif Out-of-State Summary	I8	9.95	9.18	Update summary with corrections to Tab 14, Intermountain Power Plant (Ownership Interest), California Imported CO2 emissions.
3	Calif Out-of-State Summary	E9	Others	Excess Power Purchased	Tab 14, Intermountain Power Plant (Contract Interest) California Percent of Generation (23.54%) represents Excess Power purchased by all California participants.
3	Calif Out-of-State Summary	I9	2.80	2.88	Update summary with corrections to Tab 14, Intermountain Power Plant (Contract Interest), California Imported CO2 emissions.
3	Calif Out-of-State Summary	I12	3.37	3.26	Update summary with corrections to Tab 14, Navajo Power Plant, California Imported CO2 emissions.
4	Calif Utilities	G14 H14	0.08 3.41	0.00 3.33	Digester gas is considered carbon neutral, therefore CO2 emissions should be = 0. Subtract 0.08 from City of Los Angeles Total emissions.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
5	Calif. Utilities Plant Level	M24, N24 M25, N25 M26, N26	726,909 1,928,199 298,076	Total should be 2,953,117	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif. Utilities Plant Level	O24 O25 O26	74,091 194,004 28,772	Total should be 296,298	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif. Utilities Plant Level	M27, N27 M28, N28 M29, N29	7,575,295 11,809,268 12,017,360	Total should be 31,398,864	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif. Utilities Plant Level	M30, N30	10,456,706	10,514,553	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif. Utilities Plant Level	O30	937,137	922,753	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.
5	Calif. Utilities Plant Level	M31, N31 M32, N32 M33, N33	6,930,420 11,294,936 21,194	Total should be 18,243,230	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
5	Calif. Utilities Plant Level	M35, N35	1,630,874	1,630,470	Replace EIA data with MMBtu calculated from monthly Digester Gas billing meter data and heating values (more accurate).
5	Calif. Utilities Plant Level	O35	118,877	133,261	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.
5	Calif. Utilities Plant Level	P35	0.08	0.00	Digester Gas is considered carbon neutral, therefore CO2 emissions should be = 0.
6	Calif NG	M401 N401 M402 N402 M403 N403	726,909 1,928,199 298,076	Total should be 2,953,117	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	O401 O402 O403	74,091 194,004 28,772	Total should be 296,298	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	M404 N404 M405 N405 M406 N406	7,575,295 11,809,268 12,017,360	Total should be 31,398,864	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	M407 N407	10,456,706	10,514,553	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
6	Calif NG	O407	937,137	922,753	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
6	Calif NG	M408 N408 M409 N409 M410 N410	6,930,420 11,294,936 21,194	Total should be 18,243,230	Replace EIA data with CEC-1304 annual report numbers which include corrections (more accurate).
11	Calif Other	M37, N37	1,630,874	1,630,470	Replace EIA data with MMBtu calculated from monthly Digester Gas billing meter data and heating values (more accurate).
11	Calif Other	O37	118,877	133,261	Replace EIA data with generation apportioned between natural gas and digester gas based on MMBtu.
11	Calif Other	P37	0.08	0.00	Digester Gas is considered carbon neutral, therefore CO2 emissions should be = 0.
14	Out-of-State Details	T9 QF9	540,201	446,877	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	U9 AG9	428,267	347,656	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	V9 AH9	299,991	244,840	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	W9 AI9	412,375	379,435	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	X9 AJ9	452,049	407,613	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	Y9 AK9	508,346	475,093	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	Z9 AL9	519,294	464,292	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	AA9 AM9	487,589	443,730	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	AB9 AN9	463,349	419,452	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out-of-State Details	AC9 AO9	531,316	476,324	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	AD9 AP9	507,467	440,824	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	AE9 AQ9	539,416	517,362	Replace EIA bituminous coal data with corrected total coal burned from Intermountain Annual Production Report minus sub bituminous coal.
14	Out-of-State Details	BD9 BP9	11,840,126	10,118,340	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BE9 BQ9	9,581,189	8,094,007	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BF9 BR9	6,644,801	5,629,096	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BG9 BS9	9,327,923	8,721,016	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BH9 BT9	10,483,920	9,665,067	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BI9 BU9	12,062,034	11,450,086	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out-of-State Details	BJ9 BV9	12,260,531	11,250,307	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BK9 BW9	11,294,512	10,489,275	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BL9 BX9	10,729,309	9,923,134	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BM9 BY9	12,173,512	11,162,849	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BN9 BZ9	11,575,322	10,349,332	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BO9 CA9	12,334,286	11,931,848	Replace EIA data with MMBtu calculated from corrected total coal burned and heating values from Intermountain Annual Production Report minus sub bituminous coal MMBtu.
14	Out-of-State Details	BE10 BQ10	6,216	6,116	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out-of-State Details	BM10 BY10	5,558	5,568	Replace EIA data with MMBtu calculated from Intermountain Annual Production Report monthly diesel data and heating values.
14	Out-of-State Details	Add BD11 BP11		1,730,969	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BE11 BQ11		1,494,609	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BF11 BR11		1,022,667	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out-of-State Details	Add BG11 BS11		614,145	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BH11 BT11		826,971	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BI11 BU11		621,273	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BJ11 BV11		1,034,944	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BK11 BW11		828,007	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BL11 BX11		827,804	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BM11 BY11		1,035,202	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BN11 BZ11		1,250,009	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	Add BO11 CA11		427,294	Replace EIA data with MMBtu calculated from sub bituminous coal burned and average heating value.
14	Out-of-State Details	CN9 CO9 R48 S48 R53 S53	5,689,660	5,063,498	Recalculate Intermountain Total Fuel Consumption using corrected monthly bituminous coal data.
14	Out-of-State Details	CP9 CQ9 T48 U48 T53 U53	130,307,465	118,784,357	Recalculate Intermountain Total MMBtus from bituminous coal using corrected monthly MMBtu data.
14	Out-of-State Details	CP10 CQ10 T49 U49 T54 U54	63,098	63,003	Recalculate Intermountain Total MMBtus from diesel using corrected monthly MMBtu data.
14	Out-of-State Details	CP11 CQ11 T50 U50 T56 U56	11,713,933	11,713,893	Recalculate Intermountain Total MMBtus from sub bituminous coal using corrected monthly MMBtu data.

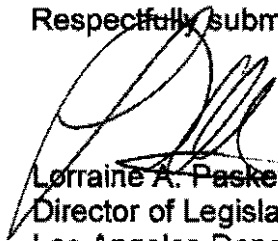
Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out-of-State Details	CQ8 U47 U52	142,084,496	130,561,253	Recalculate Intermountain Total MMBtus from coal and diesel using corrected MMBtu data.
14	Out-of-State Details	CT8 CU8	13,118,000 96.0%	13,456,638 98.48%	Replace California Consumption estimate with total MWH received by California participants based on Intermountain monthly energy accounting reports, and recalculate percentage.
14	Out-of-State Details	AB23 AO23	739,487	739,473	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	BM23 BY23	16,061,658	16,061,354	Replace EIA data with correct MMBtu from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CB23 CB24	1,433,700 2,407	Total should be 1,483,280	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CC23 CC24	740,856 3,774	Total should be 785,410	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CD23 CD24	1,044,553 5,479	Total should be 1,100,700	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CE23 CE24	1,502,128 789	Total should be 1,552,540	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CF23 CF24	1,494,207 1,392	Total should be 1,546,820	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CG23 CG24	1,406,820 2,763	Total should be 1,456,040	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CH23 CH24	1,629,104 489	Total should be 1,679,370	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CI23 CI24	1,657,073 62	Total should be 1,706,420	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CJ23 CJ24	1,477,562 1,235	Total should be 1,523,090	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CK23 CK24	1,607,322 697	Total should be 1,653,430	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CL23 CL24	1,439,350 1,198	Total should be 1,490,260	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.
14	Out-of-State Details	CM23 CM24	1,576,575 1,139	Total should be 1,623,960	Replace EIA data with metered net generation from monthly Navajo Plant Project Statistics Reports.

Tab	Tab Name	Cell Address	Current Value	Recommended New Value	Explanation for Recommended Change
14	Out-of-State Details	CN23 CO23 R67 S67	7,823,918	7,823,904	Recalculate Navajo Total Fuel Consumption using corrected monthly coal data.
14	Out-of-State Details	CP23 CQ23 T67 U67	169,986,813	169,986,511	Recalculate Navajo Total MMBtus from coal using corrected monthly MMBtu data.
14	Out-of-State Details	CQ22 U66	170,232,630	170,232,328	Recalculate Navajo Total MMBtus from coal and diesel using corrected MMBtu data.
14	Out-of-State Details	CR22 V66	17,030,674	17,601,320	Recalculate Navajo Net Generation using corrected monthly generation data.
14	Out-of-State Details	CT22 CU22 X66 Y66	3,611,000 21.2%	3,607,461 20.50%	Replace California Consumption estimate with actual MWH LADWP received from Navajo based on energy accounting records, and recalculate percentage.
14	Out-of-State Details	Z48 Z49 Z50 Z53 Z54 Z56	10,387 9,557 10,530	9,555	Recalculate Plant Heat Rate using corrected MMBtu and MWH data.
14	Out-of-State Details	AA48 AA49 AA50 AA53 AA54 AA56	12.18 0.00 1.10	11.11 0.00 1.14	Recalculate Total CO2 Emissions using corrected MMBtu data and fuel-specific emission factors from the CCAR Power/Utility Protocol.
14	Out-of-State Details	AB47	9.95	9.18	Recalculate California Imported CO2 emissions using corrected Total CO2 Emissions and California Percent of Generation (ownership).
14	Out-of-State Details	AB52	2.80	2.88	Recalculate California Imported CO2 emissions using corrected Total CO2 Emissions and California Percent of Generation (contract).
14	Out-of-State Details	AC47 AC52	2,143	1,976	Recalculate lbs CO2/MWh factor using revised Total CO2 emissions.
14	Out-of-State Details	Z67 Z68	9,994 11,474	9,672	Recalculate Plant Heat Rate using corrected MMBtu and MWH data.
14	Out-of-State Details	AB66	3.37	3.26	Recalculate California Imported CO2 emissions using corrected California Percent of Generation.
14	Out-of-State Details	AC66	2,060	1,993	Recalculate lbs CO2/MWh factor using revised plant generation and Total CO2 emissions.

IV. CONCLUSION

The LADWP appreciates the opportunity to provide these comments to the CPUC and CEC for your consideration.

Dated: August 1, 2007 Respectfully submitted,



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CERTIFICATE OF SERVICE

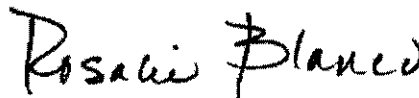
I hereby certify that I have this day served a copy of the attached:

**DATA RESPONSE AND COMMENTS OF THE
LOS ANGELES DEPARTMENT OF WATER AND POWER
ON THE JOINT CPUC/CEC STAFF REQUEST FOR INFORMATION ON
CURRENT ENTITY-SPECIFIC GREENHOUSE GAS EMISSIONS LEVELS**

on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list, updated July 31, 2007. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 1st day of August 2007, at Los Angeles, California.



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