

DOCKETED

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Description:	N/A
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CITY OF GLENDALE, CALIFORNIA

Glendale Water & Power
Administration

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September 27, 2018

California Energy Commission
EPS Compliance
1516 Ninth Street
Sacramento, CA 95814-512
Attn: Compliance Filing

Subject: EPS Compliance Filing for the Intermountain Power Project Repowering Project

Dear Sir or Madam:

Summary

The City of Glendale ("Glendale") hereby submits this attached, updated Compliance Filing package, seeking California Energy Commission (CEC) approval of the Compliance Filing for the Intermountain Power Project (IPP) Repowering Project as required by Senate Bill (SB) 1368. The Intermountain Power Agency (IPA) holds legal title to the IPP, which currently includes two 900 MW (net) coal generation units located near Delta, Utah. Glendale, along with other municipal and cooperative entities (Purchasers) buy IPP's energy.

Glendale submitted a prior Compliance Filing package for the IPP Repowering Project to the CEC in October of 2016, which was approved by the CEC pursuant to Order No. 16-1109-3. In addition, in October of 2016, LADWP submitted a Compliance Filing package for the IPP Repowering Project which was approved by the CEC pursuant to Order No. 16-1019-3. In that order, the CEC approved replacing IPP's combined 1,800 MW coal generating units with SB 1368 Emission Performance Standard (EPS) complaint Natural Gas Combined Cycle (NGCC) units totaling 1,200 MW. Since then, Glendale, IPA and the other Purchasers have evaluated the needs of the IPP participants and have determined that those needs would be best addressed with an advanced class gas turbine with a reduced total output from the 1,200 MW to 840 MW. The reduction in output will allow for additional capacity on the transmission lines associated with IPP for renewable energy integration, while still maintaining the minimum required dispatchable generation necessary to support the HVDC Transmission System that connects Utah and the Intermountain West region with California.

Background

IPA, a political subdivision of the State of Utah, began construction of IPP in October 1981, with commercial operation of Unit 1 commencing in June, 1986 and of Unit 2 in May, 1987. Each Purchaser's share of IPP's generation was established by a Power Sales Contract, as entered into between IPA and the Purchasers. The Purchasers include 23 Utah municipalities, six Rural Electric Cooperatives, and six California municipalities as follows:

**UTAH MUNICIPAL
PURCHASERS:**

Beaver
Bountiful
Enterprise
Ephraim
Fairview
Fillmore
Heber
Holden
Hurricane
Hyrum
Kanosh
Kaysville
Lehi
Logan
Meadow
Monroe
Morgan
Mt. Pleasant
Murray
Oak City
Parowan
Price
Spring City

**UTAH COOPERATIVE
PURCHASERS:**

Bridger Valley REA
Dixie-Escalante REA
Flowell Electric Assoc.
Garkane Power Assoc.
Moon Lake Elec. Assoc.
Mt. Wheeler Power, Inc.

**CALIFORNIA
PURCHASERS:**

Anaheim
Burbank
Glendale
LADWP
Pasadena
Riverside

Although the Power Sales Contracts will expire on June 15, 2027, those contracts required IPA to offer the Purchasers the right to continue participating in an IPP repowering beyond that date by entering into the Renewal Power Sales contracts and the Agreement for Sale of Renewal Excess Power (Renewal Contracts).

Subsequent to the CEC's approval of the IPP Repowering Project and Glendale's Second Amendatory Power Sales Contract with IPA pursuant to Order Nos. 16-1019-3 and 16-1109-3; Glendale and the Purchasers entered into the Renewal Contracts in early 2017.

Alternative Repowering of the IPP Repowering Project

Pursuant to the current Power Sales Contracts, which provide for the previously approved EPS-compliant IPP Repowering Project, an Alternative Repowering is also permitted in the event Purchasers choose that course. Accordingly, the Purchasers have exercised the desire for an Alternative Repowering to reduce the previously approved IPP Repowering Project for 1,200 MW of EPS-compliant NGCC to 840 MW of EPS-compliant NGCC.

Based upon the generation power blocks currently on the market, there are three (3) options for this generation output and generation type, as summarized in Attachment A.¹

¹ Attachment A is based entirely on information received from LADWP, the operating agent for IPP.

Compliance Filing

Pursuant to 20 CCR section 2900 *et seq.*, of the California Code of Regulations, adopted by the CEC to implement Senate Bill 1368, Glendale hereby submits the attached Compliance Filing. Glendale respectfully requests that the CEC determine that the Alternative Repowering of the previously-approved IPP Repowering Project is similarly in compliance with the EPS regulations promulgated by the CEC.

The CEC Compliance Filing is shown as Attachment A. Attachment B includes Glendale City Council Resolution No. 18-127, adopted on July 17, 2018, approving the submission of the Compliance Filing to the CEC. Attachment C is the attestation required by 20 CCR §2909.

If the CEC has any questions or requests additional information regarding this coal divestiture and EPS-compliant repowering, please contact Mark Young, Integrated Resource Planning Administrator for Glendale Water & Power, at (818) 548-3293.

Sincerely,



Stephen M. Zurn
General Manager, Glendale Water & Power

Attachments

Attachment A

**CALIFORNIA ENERGY COMMISSION
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING**

DESCRIPTION OF IPP REPOWERING PROJECT

Name of Facility: Intermountain Power Project

Location of Facility: 850 W Brush Wellman Road, Delta Utah 84624

Proposed Technology/Fuel: Natural Gas-Fired Combined Cycle Generating Facility

Planned Commercial Operation Date: July 1, 2025

Generation Configuration Options:

Preliminary Rated Capacity and CO₂ emission estimates were developed from vendor data with station service loads and long term degradation applied for the IPP Repowering Project at site conditions of: 102 °F, 9.7% RH, and an elevation of 4760 ft. with evaporative inlet cooling. The combined unit output will be limited to a maximum of 840 MW Net.

Prime Mover	1x1 Combined Cycle	1x1 Combined Cycle	1x1 Combined Cycle
Quantity	2	2	2
Manufacturer	GE	Siemens	Mitsubishi
Model	7HA.02	SGT6-9000HL	M501JAC
Rated Capacity (MW), at IPP Site	435 each, 870 total	430 each, 860 total	451 each, 902 total
Fuel Used	Natural Gas	Natural Gas	Natural Gas
EPS Compliant	Yes	Yes	Yes
Expected Operating Profile	See Figure 3	See Figure 3	See Figure 3
Expected energy output (MWh)	See Figure 3	See Figure 3	See Figure 3
Expected fuel use profile	See Figure 4	See Figure 5	See Figure 6
Estimated CO ₂ emissions for site conditions, (lbs/MWh)	752	755	764
Estimated CO ₂ emissions after derate	756	761	771

Figure 1 - Generation Configuration Options.

Power Purchase Contract Terms

Name of Counter Party: Intermountain Power Agency (IPA)-

Length of Renewal Power Sales Contract: 50 years

Duration: July 1, 2027 – June 15, 2077

Product: Energy (MWh)

Capacity for Project: 840 MW²

Capacity for Participants: Below in Figure 2, is the subscribed generation entitlement for each Participant under the Renewal Power Sales Contracts.

CALIFORNIA PURCHASERS		
PURCHASER	SHARE TO BE DELIVERED	SHARE OF 840 MW
Burbank	4.167%	35
Glendale	4.167%	35
LADWP	64.775%	544
Pasadena	1.667%	14
Riverside	4.167%	35
GROUP TOTAL	78.943%	663
UTAH COOPERATIVE PURCHASERS		
GROUP TOTAL	7.017%	59
UTAH MUNICIPAL PURCHASERS		
GROUP TOTAL	14.040%	118
PURCHASER TOTAL	100.000%	840

Figure 2 - Generation Distribution

Expected Deliverables: Please refer to Figure 2

Must Take Provisions: Please refer to Figure 2

Dispatch Provisions: It is assumed that LADWP will continue its responsibilities as the Operating Agent for the repowered IPP units, and will continue to be responsible for the dispatch of the IPP units based on Participant and system demand.

Unit Contingency: N/A

Expected Operating Profiles:

A simulation of the load profile performed by LADWP staff is below in Figure 3 utilizing the GE configuration. The Siemens and Mitsubishi options will follow similar profiles as the heat rates and other characteristics are comparable. The load profile was used to derive the average estimated energy output per year as shown below:

Energy Output (MWh): 5,003,712

The average annual capacity factor for all manufacturers is 68%.

² The Project size per the Partnership needs is limited to 840 MW Net. The Generation Scenarios listed above are based on the available generation sizes from the 3 respective vendors.

Avg Monthly Block Dispatch 2035

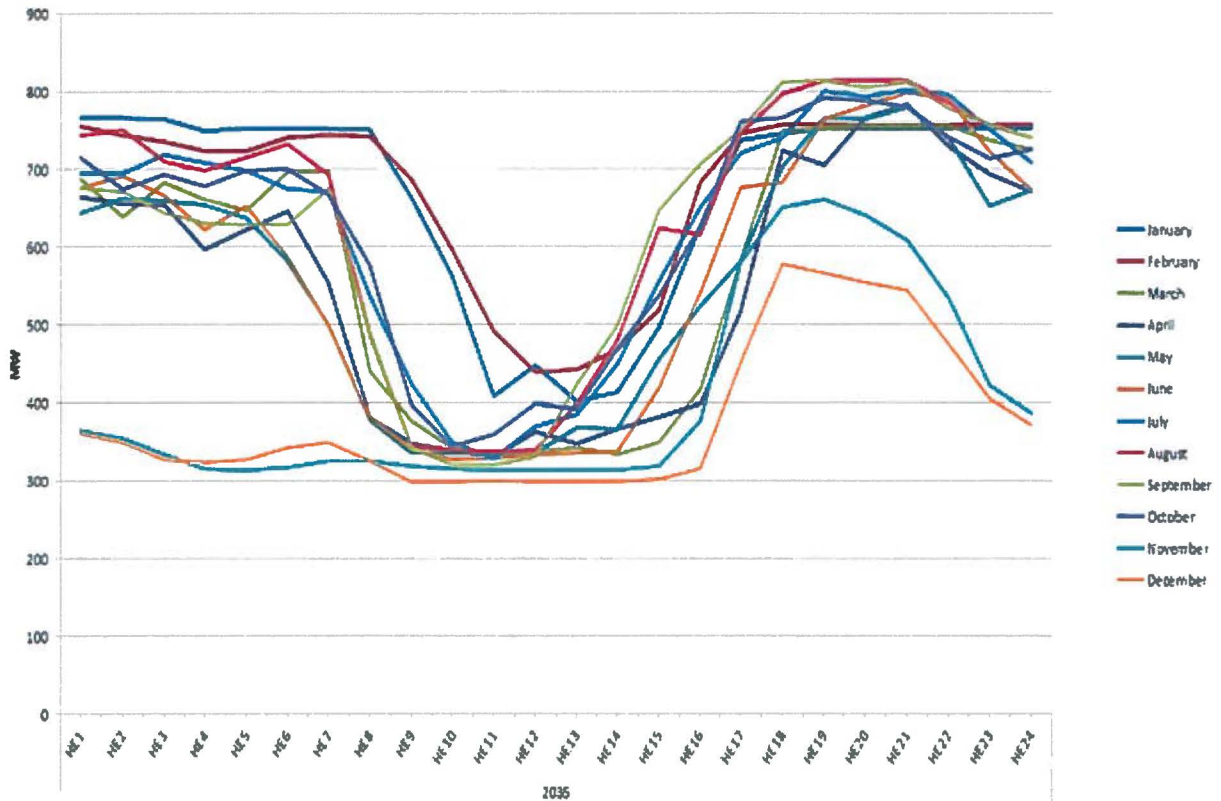


Figure 3 - Average Monthly Block Dispatch

Expected Fuel Use Profile:

Below is the preliminary fuel use data received from each respective vendor, estimated for the IPP site conditions.

GE - Estimated Combined Cycle Data for IPP Repowering				
All data estimated for site conditions, no duct firing, cooling towers				
Evaporative Cooling		On	Off	Off
Load		100%	100%	80%
Net Block Output	MW	435	385	313
Block Heat Input (HHV)	MMBTU/h	2,794	2,484	2,073
CO2 Emissions	lbs/MWh	752	755	775

Figure 4 - GE Fuel Use Profile (from vendor data)

Siemens - Estimated Combined Cycle Data for IPP Repowering					
All data estimated for site conditions, no duct firing, cooling towers					
Evaporative Cooling		On	Off	Off	Off
Load		100%	100%	80%	60%
Net Block Output	MW	430	381	309	242
Block Heat Input (HHV)	MMBTU/h	2,776	2,475	2,124	1,756
CO2 Emissions	lbs/MWh	755	761	803	849

Figure 5 - Siemens Fuel Use Profile (from vendor data)

Mistubishi - Estimated Combined Cycle Data for IPP Repowering					
All data estimated for site conditions, no duct firing, cooling towers					
Evaporative Cooling		On	Off	Off	Off
Load		100%	100%	80%	60%
Net Block Output	MW	451	414	339	265
Block Heat Input (HHV)	MMBTU/h	2,942	2,720	2,282	1,860
CO2 Emissions	lbs/MWh	764	768	787	820

Figure 6 - Mitsubishi Fuel Use Profile (from vendor data)

Data from Existing Plant – Apex Generating Station

Below in Figure 7 is average hourly data extracted from LADWP’s Apex Generating Station located in Clark County, Nevada. The plant consists of a GE MS7000FA 527 MW 2x1 Combined Cycle generating station. The total energy output for the plant in 2015 was 2,635,293 MWh, with a resultant capacity factor of 57%.

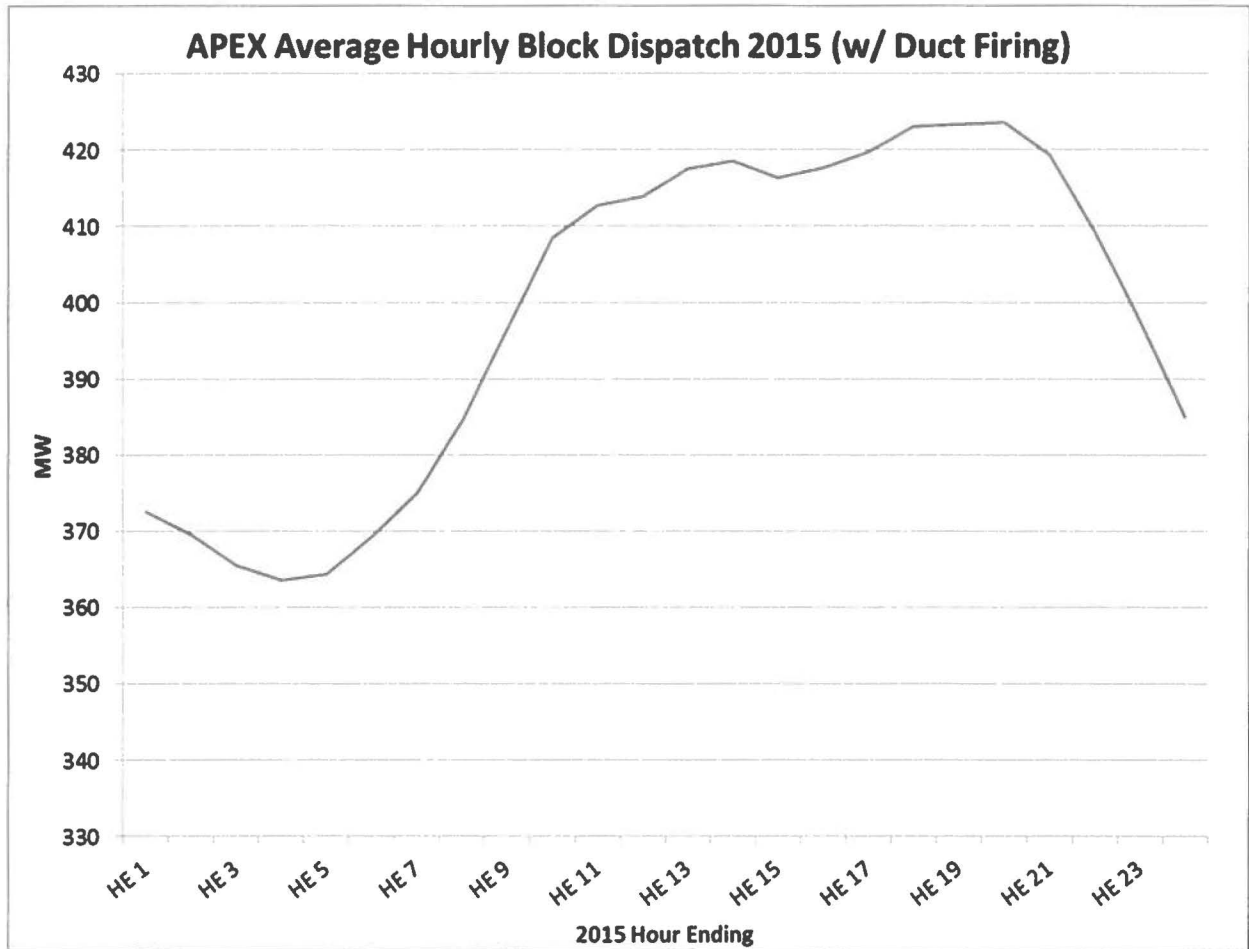


Figure 7 - Apex 2015 Load Profile

Apex - Data		100%	90%	80%	70%	60%	50%	40%	30%
Load									
Net Plant Output	MW	531	478	425	372	319	266	212	192
CO2 Emissions	lbs/MWh	884	835	841	856	886	939	1,031	1,084

Figure 8 - Apex 2015 Fuel Use Profile

ATTACHMENT B

California Energy Commission Emissions Performance Standard Compliance Filing

Resolution No. 18-127 of the Council of the City of Glendale

Adopted
07/17/18
Devine/Agajanian
Absent: Gharpetian

RESOLUTION NO. 18-127

**A RESOLUTION OF THE COUNCIL OF THE CITY OF GLENDALE,
CALIFORNIA APPROVING AN EMISSIONS PERFORMANCE STANDARD
COMPLIANCE FILING FOR SUBMITTAL TO THE CALIFORNIA ENERGY
COMMISSION IN CONNECTION WITH THE ALTERNATIVE REPOWERING OF THE
INTNERMOUNTAIN POWER PROJECT, AND AUTHORIZING THE GENERAL
MANAGER OF GLENDALE WATER & POWER TO SUBMIT SUCH FILING TO THE
CALIFORNIA ENERGY COMMISSION**

WHEREAS, in 1980, the City of Glendale entered into a long-term agreement with the Intermountain Power Agency ("IPA") for the purchase of a share of the coal-fired generation from the Intermountain Power Project ("IPP") and transmission rights from Delta, Utah, to Southern California; and

WHEREAS, on February 1, 1983, Glendale and IPA entered into an Amendatory Power Sales Contract as an amendment to the Power Sales Contract; and

WHEREAS, pursuant to Resolution No. 15-119 dated June 16, 2015, the City Council authorized the Second Amendatory Power Sales Contract amending the Amendatory Power Sales Contract, and further authorized the City Manager to enter into the Renewal Power Sales Contract and the Agreement for Sale of Renewal Excess Power (Renewal Contracts); and

WHEREAS, IPP has been operating as a coal-fired power plant for over 30 years owned by IPA and operated by the Los Angeles Department of Water & Power (LADWP) as Project Manager and Operating Agent on IPA's behalf; and

WHEREAS, the Renewal Contracts for IPP generation are subject to the California Energy Commission's (CEC) Emission Performance Standard regulations (EPS; 20 CCR §2900 *et seq.*), including the requirement in 20 CCR §2909) that a publicly-owned utility submit a compliance filing with the CEC within 10 business days of entering into a "covered procurement" as therein defined (Compliance Filing); and

WHEREAS, the Second Amendatory Power Sales Contract provides for the ability to repower IPP's fuel source from its current 1,800 megawatts (MW) net of gas-fired generation to no more than 1,200 MW of EPS-compliant natural gas-fired combined cycle generation; and

WHEREAS, on November 9, 2016, pursuant to Order No. 16-1109-3, the CEC found Glendale's October 19, 2016 compliance filing to be complete and concurred that Glendale's Second Amendatory Power Sales Contract with IPA for the proposed

repowering of IPP from its current 1,800 MW of coal-fired generation to approximately 1,200 MW of EPS-compliant natural gas-fired combined cycle generation to be EPS-compliant; and

WHEREAS, the Second Amendatory Power Sales Contract, and Renewal Contracts also allow for an Alternative Repowering to modify or further reduce the 1,200 MW of EPS-compliant natural gas-fired combined cycle generation; and

WHEREAS, Glendale and the other IPP participants are considering a future vote on an Alternative Repowering resulting in EPS-compliant natural gas-fired combined cycle generation with a reduced output of 840 MW; and

WHEREAS, the EPS regulations require that a Compliance Filing be first approved by the City Council prior to submitting it to the CEC; and

WHEREAS, based upon the City Council's knowledge, information or belief, the Compliance Filing attached as Attachment 1 to the July 17, 2018 Report to the City Council, and on file with the City Clerk, does not contain a material misstatement or omission of fact and the Alternative Repowering complies with the EPS Regulations.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF GLENDALE, CALIFORNIA:

SECTION 1. The Compliance Filing regarding the Alternative Repowering for a reduced output of 840 MW attached as Exhibit 1 to the July 17, 2018 Report to the City Council, and on file with the City Clerk, be and the same is hereby approved.

SECTION 2. The Council does hereby authorize the General Manager of GWP or such other person as the General Manager shall designate in writing, to execute and submit the Compliance Filing and any all other related documents and instruments to the CEC.

SECTION 3. This action is exempt from the requirements of the California Environmental Quality Act ("CEQA") pursuant to Sections 15060(c)(1) and 15378 of the CEQA Guidelines.

Adopted this 17th day of July, 2018.

Mayor

ATTEST:

City Clerk

APPROVED AS TO FORM
PRINCIPAL ASSISTANT CITY ATTORNEY
DATE July 12, 2018

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)
CITY OF GLENDALE)

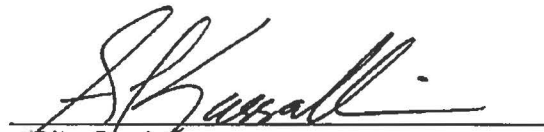
I, Ardashes Kassakhian, City Clerk of the City of Glendale, do hereby certify that the foregoing Resolution No. 18-127 was duly adopted by the Council of the City of Glendale, California, at a regular meeting held on the 17th day of July, 2018 and that the same was adopted by the following vote:

Ayes: Agajanian, Devine, Najarian, Sinanyan .

Noes: None

Absent: Gharpetian

Abstain: None



City Clerk

ATTACHMENT C

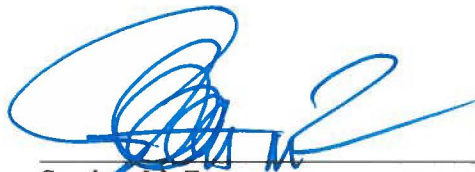
California Energy Commission Emissions Performance Standard Compliance Filing

COMPLIANCE FILING ATTESTATION

I, the official named below, certify under penalty of perjury, the following:

1. I am an agent of the City of Glendale (Glendale) authorized by the Glendale City Council (Council) to sign this attestation on its behalf;
2. The Council has reviewed and approved in noticed public meetings both the covered procurement (on June 16, 2015) and the Compliance Filing (on July 17, 2018), to which this attestation is attached;
3. Based on the Council's knowledge, information, and belief, the Compliance Filing does not contain a material misstatement or omission of fact;
4. Based on the Council's knowledge, information, or belief, the covered procurement complies with Title 20, Division 2, Chapter 11, Article 1 of the California Code of Regulations; and
5. The covered procurement contains the contractual terms or conditions specifying that the contract or commitment is void and all energy deliveries shall be terminated no later than the effective date of any CEC decision pursuant to 20 CCR section 2910 that the covered procurement fails to comply with 20 CCR section 2900 *et seq.*

Executed this 27th day of September, 2018 at Glendale, California.



Stephen M. Zurn
General Manager, Glendale Water & Power
City of Glendale