

Los Angeles  Department of Water & Power

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June 4, 2014

Thuy Hua, AICP
Los Angeles County Department of Regional Planning
Senior Regional Planner – Department of Regional Planning
County of Los Angeles
320 West Temple Street
Los Angeles, CA 90012

Dear Thuy Hua:

Subject: Comments on the Proposed “Los Angeles County Renewable Energy Ordinance”

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide the following comments regarding the Los Angeles County’s (County) proposed Renewable Energy Ordinance to establish regulations for the development of small-scale renewable energy systems, utility-scale renewable energy facilities, and temporary meteorological towers across 2,600 square miles of unincorporated portions of the County.

Serving more than 1.4 million customers in Los Angeles with a generating capacity of over 7,300 megawatts (MW), LADWP is the nation's largest municipal utility. LADWP is vertically integrated, owning and operating a large portfolio of generation, transmission, and distribution assets spanning several states. LADWP is making unprecedented efforts to transform its electric utility system and address the risk of climate change which include reaching 33 percent of renewable energy by 2020. Over the past decade, LADWP's efforts have resulted in a downward trajectory in its power generation portfolio CO₂ emissions and CO₂ emissions intensity since 2000. Between 1990 and 2012, LADWP's CO₂ emissions have been reduced by 22 percent and its emissions intensity has decreased by 29 percent.

As a municipal utility, we are fully committed to the interest and goals of the State of California towards increasing renewable energy and appreciate the County’s goal to “help facilitate the development of renewable energy within the County and assist the County to meet the goals of AB 32 [the Global Warming Solutions Act of 2006]”.

Los Angeles Aqueduct Centennial Celebrating 100 Years of Water 1913-2013

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However, we are concerned that the proposed ordinance outlined in the April 30, 2014, Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting document will discourage renewables development in the County.

As LADWP looks into the future, most of the issues influencing strategic and resource planning are based on the critical issues that LADWP is facing in the areas of greenhouse gas emission (GHG) reduction, while LADWP is trying to maintain its foremost priorities to protect its ratepayers from unnecessary rate impacts and ensure the continuous reliable operation of its electric grid. LADWP is concerned that the proposed ordinance as outlined can discourage renewable projects investments in Los Angeles County and negatively impact GHG reduction efforts.

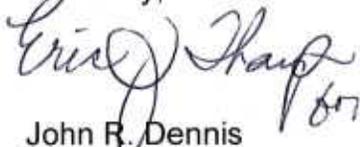
In particular, LADWP believes that this ordinance would add additional burdens by requiring transmission lines to be built underground and placing excessive regulatory requirements on the projects. These will have the net effect that future renewable projects will become so expensive or difficult to site as to prevent investment in these worthy projects. Accordingly, the ordinance would increase the costs of renewables which would have an adverse effect on the underlying purpose of improving air quality.

LADWP respectfully request that the County not only take into consideration LADWP's concerns, but also conform to the intended outcome of Assembly Bill (AB) 32.

Furthermore, LADWP supports the comments filed by the Southern California Public Power Authority (SCPPA).

If you have any questions, please contact me at (213) 367-0881.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Dennis", with a date "6/7" written below it.

John R. Dennis
Director, Power Planning and Development

SF:ps