

# Review of LADWP Compliance Filings to SWRCB

SACCWIS Meeting

July 5, 2011

Inter-Agency Working Group

# LADWP's Proposed Schedule

Facility	Existing Units		Adopted OTC Schedule	LADWP Proposed Schedule	Replacement Capacity (MW)
	Unit	Capacity (MW)			
Haynes	Units 5 & 6	535	2019	2013	600
	Units 1 & 2	444	2019	2027	444
	Unit 8	250	2019	2035	250
Harbor	Unit 5	65	2015	2031	65
Scattergood	Unit 3	450	2020	2015	509-574
	Units 1 & 2	367	2020	2024	367

# OTC Process

- October 1, 2010 – OTC policy effective
- November 1 – SWRCB issues compliance plan instructions to generators
- February 2011 – LADWP submits its reliability study
- April 1 – generators submit compliance plans
- April 8 – SACCWIS formation meeting
- May – June – LADWP discussions with SACCWIS members
- July 5 – SACCWIS meeting to address schedule

# State Energy Policy

- SB 1368 (2006) restricts construction or contracting for coal power generation
- California Clean Energy Future (Sept 2010) establishes joint energy policy, encompassing resource preferences and maintenance of reliability
- ARB AB32 Scoping Plan has some similar goals
- Governor Brown Jobs/Energy Plan accentuates distributed renewables
- SB1X-2 (2011) codifies 33% renewables by 2020

# LADWP Implementation Plan

- Accelerated repowering for Harbor 5-6 and and a Scattergood unit are already required by SCAQMD
- Coal power backout and renewable development are being pursued
- Repowering schedule for other LADWP units are substantially delayed
- “Rate shock” seems to be a substantial constraint

# Analysis of LADWP Plan

- IAWG has relied upon a CEC staff summary of detailed discussions with LADWP
- Local reliability considerations justify retaining some utility capacity, or its equivalent, at Haynes, Harbor and Scattergood
- Staged repowering of selected units at existing plant sites is likely to be necessary
- Transmission as a substitute is not explored
- The role of energy efficiency, DG and CHP are not documented in LADWP's Plan

# Conclusion

- Despite large volume of detailed information, LADWP's long-term plan is still under development
- System or local reliability concerns need to be demonstrated to justify a change in the compliance schedule
- Numerous uncertainties make a long-term schedule problematic, and hopefully in later updates LADWP can make more informed choices
- While accelerating some repowering schedules can be applauded, an integrated utility has alternatives to large-scale power plants, including DG, CHP and energy efficiency