



## PASADENA WATER AND POWER

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

Re: Pasadena Emission Performance Standard Compliance Filing for the Intermountain Power Project Repowering Project ("IPP Repowering Project")

Dear Sir or Madam:

**Summary**

The City of Pasadena, Water and Power Department ("PWP") hereby submits the attached Compliance Filing package, seeking California Energy Commission ("CEC") approval of the Compliance Filing for the IPP Repowering Project as required by Senate Bill 1368 ("SB 1368"). The Intermountain Power Agency ("IPA") holds legal title to the Intermountain Power Project ("IPP"), which includes two 900 MW (net) coal generating units located near Delta, Utah. The Los Angeles Department of Water and Power ("LADWP") is IPA's Project Manager and Operating Agent for IPP. The City of Pasadena ("Pasadena"), along with LADWP and other municipal and cooperative entities ("Purchasers"), buy IPP's energy.

A prior Compliance Filing package for the IPP Repowering Project was submitted to the CEC in October of 2016, which was approved by the CEC pursuant to Order No: 16-1019-3. In that order, the CEC approved replacing IPP's combined 1,800MW coal generating units with CEC SB 1368 Emission Performance Standards ("EPS") compliant natural gas combined cycle ("NGCC") units totaling 1,200MW. Since then, IPA, LADWP and the other Purchasers have evaluated the needs of the IPP participants, and have determined that those needs would be addressed with an advanced class gas turbine with a reduced total output from 1,200MW to 840MW. 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 require IPA to offer the Purchasers the right to continue participating in an IPP Repowering Project 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 by Oder No: 16-1019-3, Pasadena and 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 1,200MW of EPS compliant NGCC to 840MW of EPS compliant NGCC.

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

**Compliance Filing:**

Pursuant to 20 CCR § 2900 *et seq.*, of the California Code of Regulations, adopted by the CEC to implement SB 1368, Pasadena hereby submits the attached Compliance Filing. In submitting this filing, Pasadena 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 provided as Attachment 2. Attachment 3 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 the following representative of PWP, Power Resource Planning Manager: Mandip Samra, (626) 744-7493, [msamra@cityofpasadena.net](mailto:msamra@cityofpasadena.net).

Sincerely,

Gurcharan Bawa  
General Manager  
Pasadena Water and Power

Attachments