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DIVISION OF WATER QUALITY

May 25, 2012

Mr. Dominic Gregorio
Division of Water Quality
Supervisor, Watersheds, Ocean & Wetlands Section
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95812

Dear Mr. Gregorio:

Subject: Follow up to Draft Information Request Implementing the Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling

I am sending to you this follow up letter since I was not sure that you received my email I sent to you on May 8, 2012 (Enclosure 1). As I mentioned in my email, LADWP would be happy to meet with you and the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) Interagency Working Group (IAWG) before you send a letter requesting additional information in order for all of us to understand why certain studies are being requested so that LADWP can properly address the concerns.

Just to recap, LADWP had made modifications to your letter (see Enclosure 2, also attached to the May 8th email). After discussing the studies that were stipulated in your draft letter with LADWP's Power System engineers, the responses were as follows:

Study 1:

- As mentioned in my email enclosed, studies requested in paragraphs a. and b. can be found in the recently completed AQMD 2012 report. Both the 2014 and 2021 cases are included; the mid case load can be interpreted as 2014.
- Paragraphs c. and d.: Need to understand the justification for these studies, LADWP believes these studies would not be useful for purposes of the SACCWIS.

Study 2:

- As mentioned in my email, these studies are inappropriate because they are based on speculative assumptions of public policy. These studies could expose LADWP and CAISO to conditions that are not real and therefore put the grid

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systems at risk. These studies have been previously discussed, for a joint AB1318 study, by a separate agency working group that includes the CEC, CAISO, CARB, and LADWP. It has been agreed to by all parties of this working group that the assumptions should not be used for grid reliability predictions.

Study 3:

- As mentioned in my email, long term transmission planning is done for NERC; paragraphs a and b. have been completed and were included in our 2011 grid reliability report. With regards to paragraph c, due to the fact that LADWP cannot take existing transmission offline due to reliability requirements, as has also been described in LADWP's past grid reliability reports, the study requested cannot be done.

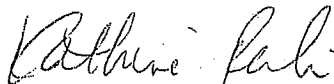
Study 4:

- LADWP suggests that this study is not needed since the results will already be obtained from Study 1. Therefore, LADWP would like to know the basis and justification for such a study.

As has been mentioned in previous correspondence, LADWP strives to be an environmental steward, and has chosen to completely eliminate the use of once-through cooling as its compliance path with the Statewide Policy. The schedule as negotiated at the July 19, 2011 hearing allows a sustainable path forward that balances environmental responsibility and grid reliability.

Thank you again for working with LADWP, it is very much appreciated. Looking forward to hearing from you. If you have any questions, I can be reached at 213-367-0436.

Sincerely,



Katherine Rubin
Manager of Wastewater Quality and Compliance

KR:lr

Enclosures

c: Mr. Charlie Hoppin – Chairman – State Water Resources Control Board (SWRCB)
Ms. Fran Spivy Webber – Vice Chair - SWRCB
Ms. Tam Doduc – Member - SWRCB
Mr. Jonathan Bishop – Deputy Chief – SWRCB
Ms. Katherine Rubin