12/14/10 Adoption Hearing
Once Through Cooling
Deadline: 11/19/10 by 12 noon

CCA | Central City Association of LOS ANGELES

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November 10, 2010

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SWRCB EXECUTIVE

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

VIA E-Mail: commentletters@waterboards.ca.gov

Dear Ms. Townsend:

RE: Proposed Amendments to Once-Through Cooling Policy Released by State Water Resources Control Board

Established in 1924, Central City Association (CCA) is L.A.'s premier business advocacy association whose 450 members employ over 350,000 people in the Los Angeles region. On behalf of CCA, I offer this letter in support of the proposed amendments to the Once-Through Cooling (OTC) Policy released by the State Water Resources Control Board (SWRCB) on September 27, 2010.

It is our understanding that the proposed amendments would allow utilities, such as the Los Angeles Department of Water and Power (LADWP), to continue the use of OTC for newly repowered, highly efficient facilities for the remainder of their useful lives - as long as environmental impacts from that OTC usage are either controlled or mitigated. Furthermore, it allows a compliance deadline beyond the current December 31, 2020 date for utilities that commit to eliminating OTC usage upon repowering their existing units. This would allow LADWP to meet the intended environmental goal of the Policy in a balanced and methodical way that does not financially burden ratepayers during these difficult economic times.

CCA has studied this issue and the information provided by LADWP. In order to eliminate the use of OTC by the current Policy's compliance deadline, LADWP would have to spend $2.2 billion over the next 10 years to accelerate its repowering program, resulting in a rate increase of 6%. The proposed amendments would provide for a mechanism to extend the compliance deadlines with appropriate interim environmental mitigation commitments.

As a major Downtown Los Angeles stakeholder, CCA supports legislation that provides for the future health of both the California environment and its economy. The implications of the current Policy on our daily finances and economic health cannot be overlooked, and we urge you to adopt the amendments to the Policy as proposed on September 27th.

Sincerely,

Carol E. Schatz
President & CEO
Central City Association of Los Angeles

cc: Gilbert Ivey, Metropolitan Water District of Southern California