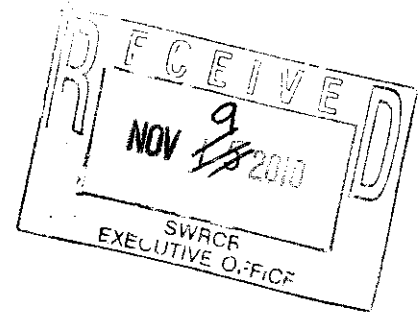




Los Angeles Area  
Chamber of Commerce

November 9, 2010

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, Ca 95814



VIA E-Mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Dear Ms. Townsend:

Subject: Proposed Amendments to the Statewide Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Policy)

The Los Angeles Area Chamber of Commerce wishes to voice its support of the proposed amendments to the OTC Policy released by the State Water Resources Control Board (SWRCB) on September 27, 2010.

The proposed amendments would allow utilities such as the Los Angeles Department of Water and Power (LADWP) to continue the use of once through cooling (OTC) for newly repowered, highly efficient facilities for the remainder of their useful lives as long as environmental impacts from that OTC usage was either controlled or mitigated. Furthermore, the Policy allows a compliance deadline beyond the current December 31, 2020 date for utilities that commit to eliminating OTC usage upon repowering their existing units. For utilities such as LADWP, this would allow the intended environmental goal of the Policy to be met in a balanced and methodical way that does not financially burden ratepayers such as our members during these difficult economic times when we cannot afford it.

The Los Angeles Area Chamber of Commerce has studied this issue and its potential cost to ratepayers. In order to eliminate the use of OTC by the current Policy's compliance deadline, LADWP would have to accelerate their repowering program by expending \$2.2 billion over the next 10 years - resulting in a rate increase of 6%. The Policy amendments now provide for a mechanism to extend the compliance deadlines with appropriate interim environmental mitigation commitments.

The serious financial implications of the current Policy on the finances of our member businesses and economic health of our community cannot be overlooked. We urge you to adopt the amendments to the Policy as proposed on September 27<sup>th</sup> as a balanced approach to environmental protection.

Sincerely,

  
Gary Toebben  
President & CEO