

## Memorandum

To: Chair Robert B. Weisenmiller  
Commissioner Karen Douglas  
Commissioner David Hochschild  
Commissioner Andrew McAllister  
Commissioner Janea A. Scott

Date: October <sup>28</sup>XX, 2016

From: Robert P. Oglesby  
Executive Director



Subject: **Approval of the City of Glendale Emission Performance Standard Compliance Filing**

On October 19, 2016, the City of Glendale (Glendale) submitted a compliance filing requesting the Energy Commission find that Glendale's covered procurement for the proposed natural gas-fired Intermountain Power Project (IPP) Repowering Project (Project) be determined to be compliant with the Energy Commission's Greenhouse Gases Emission Performance Standard (EPS), pursuant to Title 20 of the California Code of Regulations, Section 2900, et seq.

SB 1368 EPS limits long-term investments in baseload generation by the state's utilities to power plants that meet an EPS jointly established by the Energy Commission and the California Public Utilities Commission. The emission rate limit is 1,100 pounds of carbon dioxide (CO<sub>2</sub>) per megawatt-hour (MWh). The EPS establishes a public process for determining the compliance of proposed utility investments. Utilities are required to submit a compliance filing upon committing to an investment that is required to meet the EPS.

Six California publicly owned utilities (Anaheim, Burbank, Glendale, Los Angeles, Pasadena, and Riverside) along with 23 Utah municipalities, and 6 rural electric cooperatives currently purchase power from IPP under a Power Sales Contract that was signed on July 11, 1980 and expires on June 15, 2027. The Intermountain Power Authority (IPA), a political subdivision of the State of Utah, is the owner of IPP.

On June 16, 2015, the Glendale City Council approved the Second Amendatory Power Sales Contract, which subsequently went into effect on March 16, 2016. This new contract allows for the repowering of IPP's 1,800 MW coal-fired generating units with up to 1,200 MW of EPS-compliant natural gas-fired combined cycle (NGCC) units by July 1, 2025. The Project will include two NGCC units, each with a design capacity of 600 MW and an expected CO<sub>2</sub> emission rate of approximately 800 pounds per MWh. Glendale's share will be 20 MW up to a maximum of 26 MW. Glendale also has an option to withdraw from the Project or reduce its entitlement by up to 20 percent by November 1, 2019. A subsequent EPS filing will be necessary if Glendale does not withdraw and the final design implementation is significantly different from the three options described in the filing.

Los Angeles Department of Water and Power (LADWP) previously submitted a compliance filing for the conversion of IPP from a coal-fired to a gas-fired power plant and was found compliant.

Glendale's compliance filing involves the exact same resource as LADWP and identifies the same three potential NGCC designs and vendor specifications. Based on this information, staff calculated the expected CO<sub>2</sub> emission rates at various loads using the higher and lower heat inputs and associated capacities provided. Staff was able to duplicate the CO<sub>2</sub> emission rates to within 0 to 2 percent. Table 1 summarizes the Engineering Office's review of the three proposed NGCC designs.

Staff has evaluated Glendale's compliance filing and concludes that the analysis conducted in reviewing LADWP's compliance filing holds here as well: staff concludes that the Second Amendatory Power Sales Contract is compliant with the EPS pursuant to Section 2902(a); specifically, that the proposed NGCC power plant design in the compliance filing is below the EPS limit of 1,100 pounds per MWh. The NGCC units specified in the Second Amendatory Power Sales Contract meet the EPS.

Following the recent approval of LADWP's compliance filing for this facility, staff recommends the Energy Commission find that the covered procurement described in Glendale's filing complies with the Energy Commission's EPS, Title 20, Section 2900 et seq., of the California Code of Regulations.

Attachments

**Table 1: Supporting Greenhouse Gas Emission Calculations**

GE 2x1 7F.04

Load	GHG Emission	Heat Input (MMBtu/h [LHV])	Heat Input (MMBtu/h [HHV])	GHG Emissions	GHG	Capacity (MW)	Calculated GHG	Calculated GHG Emission Rate from HHV (lb/MWh)	Manufacturer Provided GHG Emission Rate (lb/MWh)	Difference (%)
	Factor (lb/MMBtu)			from LHV (lb/h)	Emissions from HHV (lb/h)		Emission Rate from LHV (lb/MWh)			
50%	117	1,908	2,099	223,236	245,560	300	744	819	811	1%
60%	117	2,192	2,411	256,464	282,110	360	712	784	776	1%
70%	117	2,501	2,751	292,617	321,879	420	697	766	759	1%
80%	117	2,828	3,111	330,876	363,964	480	689	758	751	1%
85%	117	2,981	3,279	348,777	383,655	508	687	755	748	1%
90%	117	3,214	3,535	376,038	413,642	540	696	766	759	1%
100%	117	3,669	4,036	429,273	472,200	600	715	787	780	1%

Seimens 2x1 SCC6-5000F

Load	GHG Emission	Heat Input (MMBtu/h [LHV])	Heat Input (MMBtu/h [HHV])	GHG Emissions	GHG	Capacity (MW)	Calculated GHG	Calculated GHG Emission Rate from HHV (lb/MWh)	Manufacturer Provided GHG Emission Rate (lb/MWh)	Difference (%)
	Factor (lb/MMBtu)			from LHV (lb/h)	Emissions from HHV (lb/h)		Emission Rate from LHV (lb/MWh)			
40%	117	2,203	2,423	257,751	283,526	310	831	915	918	0%
50%	117	2,430	2,673	284,310	312,741	361	788	866	870	0%
60%	117	2,646	2,911	309,582	340,540	411	753	829	832	0%
70%	117	2,864	3,150	335,088	368,597	461	727	800	803	0%
80%	117	3,093	3,402	361,881	398,069	511	708	779	782	0%
90%	117	3,342	3,676	391,014	430,115	563	695	764	767	0%
100%	117	3,619	3,981	423,423	465,765	616	687	756	759	0%

Mitsubishi 2x1 M501GAC

Load	GHG Emission	Heat Input (MMBtu/h [LHV])	Heat Input (MMBtu/h [HHV])	GHG Emissions	GHG	Capacity (MW)	Calculated GHG	Calculated GHG Emission Rate from HHV (lb/MWh)	Manufacturer Provided GHG Emission Rate (lb/MWh)	Difference (%)
	Factor (lb/MMBtu)			from LHV (lb/h)	Emissions (lb/h)		Emission Rate from LHV (lb/MWh)			
50% @ 12 °F	117	2,716	2,988	317,772	349,549	427	744	819	834	-2%
100% @ 12 °F	117	4,492	4,941	525,564	578,120	765	687	756	772	-2%
55% @ 47 °F	117	2,552	2,807	298,584	328,442	401	745	819	836	-2%
100% @ 47 °F	117	4,150	4,565	485,550	534,105	714	680	748	764	-2%
55% @ 95 °F	117	2,348	2,583	274,716	302,188	360	763	839	854	-2%
100% @ 95 °F	117	3,606	3,967	421,902	464,092	616	685	753	770	-2%
55% @ 105 °F	117	2,276	2,504	266,292	292,921	351	759	835	850	-2%
100% @ 105 °F	117	3,480	3,828	407,160	447,876	595	684	753	768	-2%



October 19, 2016

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

**Re: EPS Compliance Filing for the Intermountain Power Project (IPP) Repowering Project**

Dear Sir or Madam:

Summary

The City of Glendale (Glendale) hereby submits the attached Compliance Filing package, seeking California Energy Commission (CEC) approval of the Compliance Filing for the IPP Repowering as required by the Senate Bill (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. Glendale, along with other municipal and cooperative entities (Purchasers), buys IPP's energy.

IPA, Glendale and the other Purchasers are now pursuing the IPP Repowering Project (Project), which is scheduled to replace IPP's coal generating units with SB 1368 Emission Performance Standards (EPS) compliant Natural Gas Combined Cycle (NGCC) generating units. The target date to replace the coal units is July 1, 2025, almost two years ahead of the June 15, 2027 expiration date of the current Power Sales Contracts between IPA and the Purchasers. However, the ability to meet this earlier date is contingent upon several factors, including permitting, material procurement and final concurrence of all 35 participants. Although the Project is planned to be completed by 2025, the commercial operation date may be delayed due to circumstances beyond Glendale's control.

This project is a critical step towards achieving Glendale's goals of reducing its Greenhouse Gas (GHG) emissions and integrating additional renewable resources into its generation portfolio. This repowering will result in Glendale's complete divestiture of all coal based fuel in its portfolio of generation resources, opens up additional transmission capacity to deliver renewable generation, maintains the stability of the transmission system, and provides quick ramp rates that are essential for integration of renewable generation resources. If this Compliance Filing, together with the corresponding compliance filings of other participating California utilities, is not approved by the CEC, the Project will not proceed, and the existing IPP coal generating units will continue to generate energy until June 15, 2027.

The IPP Repowering Project is uniquely complex because of the number and geographical diversity of the Purchasers and the multiple contracts governing the scope and schedule of the Project. The goal is to build NGCC generating units that can meet the changing demands of utilities in both California and Utah and the changing generation requirements necessary for the successful integration of renewable variable energy resources.

## 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. Glendale currently receives approximately 37 megawatts (MW) of IPP generation. 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 beyond that date by entering into the Renewal Power Sales Contracts and the Agreement for Sale of Renewal Excess Power (Renewal Contracts).

After entering into the Renewal Contracts, all California Purchasers, except the Los Angeles Department of Water & Power (LADWP), have the right to terminate the contracts or to reduce their Generation Entitlement Share no later than November 1, 2019 (the "Off-Ramp Deadline"). If a California Purchaser fails to terminate its interest in the Renewal Contracts by the Off-Ramp Deadline and maintains a Generation Entitlement Share in the repowered facility, it will have a contract commitment for the procurement of electricity with a term of five years or greater.

## Description of the IPP Repowering Project

Given IPA's obligation to offer the Purchasers a right to participate in an IPP repowering after the expiration of the current Power Sales Contracts, IPA, Glendale and the other Purchasers are now pursuing entering into Renewal Contracts, which would allow for energy procurement from NGCC generating units. IPA, with

LADWP as Project Manager, is thus undertaking a natural gas repowering, defined in the Second Amendatory Power Sales Contract as the construction and installation of two NGCC power blocks, each with a design capacity of 600 MW.

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 Attachment A.<sup>1</sup>

Purchasers who choose to enter into the Renewal Contracts must obtain all Regulatory Contract Approvals, defined in the Renewal Power Sales Contracts as “all governmental regulatory approvals, consents and authorizations required or necessary” for the Purchaser to execute, perform under and be bound by the Renewal Power Sales Contract. If any Regulatory Contract Approval is denied a Purchaser, including one by the CEC, the Renewal Power Sales Contract for that Purchaser will be void.

Compliance Filing:

Pursuant to 20 CCR § 2900 *et seq.*, of the California Code of Regulations, adopted by the CEC to implement Senate Bill 1368, Glendale hereby submits the attached Compliance Filing. This filing is in advance of (i) entering into the subscription process for which Glendale will be making elections for generation entitlement shares and (ii) the Off-Ramp Deadline. In submitting this filing in advance of “entering into a covered procurement” under 20 CCR § 2909, Glendale respectfully requests that the CEC determine that the IPP Repowering Project as currently contemplated in Attachment A pursuant to the Second Amendatory Power Sales Contract, is in compliance with the EPS regulations promulgated by the CEC.

On June 12, 2015, Glendale provided notice to the CEC of its intent to deliberate at its June 16, 2015 Council meeting on a covered procurement, the Renewal Contracts, which provide for the procurement of electricity from the Project until 2077, consistent with 20 CCR § 2908.

On June 16, 2015, the Glendale City Council (Council) at a noticed public meeting consistent with the requirements of the Ralph M. Brown Act (“Brown Act” Cal. Govt. Code § 54950 *et seq.*) (i) approved and authorized the execution and delivery of the Second Amendatory Power Sales Contract, which allows the repowering of IPP’s coal-fired generating units with EPS-compliant NGCC units by July 2025, accelerating the coal divestiture date by two years, assuming Renewal Power Sales Contracts are thereafter in place and (ii) authorized the Glendale City Manager, or his designee, to participate in the IPP subscription process for a Project participation share of up to 50 MW.

The CEC Compliance Filing is shown as Attachment A. Attachment B includes the Glendale City Council Resolution, adopted on October 18, 2016. Attachment C is the attestation required by 20 CCR § 2909.

If the CEC has any questions or requests additional information regarding this coal divestiture and repowering with NGCC units, please contact Ramon Z. Abueg, Chief Assistant General Manager of Glendale Water & Power, at (818) 548-3297.

Sincerely,



Stephen M. Zurn  
General Manager - Glendale Water & Power

SMZ:to

Attachments

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<sup>1</sup> Attachment A is based entirely on information received from LADWP, the operating agent for IPP.

**Attachment A**

**CALIFORNIA ENERGY COMMISSION  
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING**

**DESCRIPTION OF IPP REPOWERING PROJECT**

**Name of Facility:** Intermountain Power Project

**Location of Facility:** 850 W Brush Wellman Road, Delta Utah 84624

**Proposed Technology/Fuel:** Natural Gas-Fired Combined Cycle Generating Facility

**Planned Commercial Operation Date:** July 1, 2025

**Generation Configuration Options:**

Since the Siemens and the Mitsubishi configurations exceed 600 MW each, they will be derated to 600 MW in order to meet the limitations defined by the project of a total maximum 1200 MW output. Duct firing is required for the GE units in order to reach a rated output of 600 MW at site. Preliminary Rated Capacity, and CO<sub>2</sub> emission data were received from each respective vendor for the IPP Repowering Project at site conditions of: 51 °F, 60% RH, and an elevation of 4760 ft.

Prime Mover	2+1 Combined Cycle	2+1 Combined Cycle	2+1 Combined Cycle
Quantity	2	2	2
Manufacturer	GE	Siemens	Mitsubishi
Model	7F.04	SCC6-5000F	M501GAC
Rated Capacity (MW), at IPP Site	600 each, 1200 total, with duct firing	616 each, 1232 total	714 each, 1428 total
Capacity after Derate	Not applicable	600 each, 1200 total	600 each, 1200 total
Fuel Used	Natural Gas	Natural Gas	Natural Gas
EPS Compliant	Yes	Yes	Yes
Expected Operating Profile	See Figure 3	See Figure 3	See Figure 3
Expected energy output (MWh)	See Figure 3	See Figure 3	See Figure 3
Expected fuel use profile	See Figure 4	See Figure 5	See Figure 6
Estimated CO <sub>2</sub> emissions for site conditions, (lbs/MWh)	744, with duct firing	759	768
Estimated CO <sub>2</sub> emissions after derate	Not applicable	761	777

Figure 1 - Generation Configuration Options.

**Power Purchase Contract Terms**

**Name of Counter Party:** Intermountain Power Agency (IPA)-

**Length of Contract:** 52 years

**Duration:** July 1, 2025 – June 15, 2077

**Product:** Energy (MWh)

**Capacity for Project:** 1200 MW<sup>1</sup>

**Capacity for Participants:** Below in Figure 2, is the current generation entitlement for each Participant of the current Power Sales Contracts. The final percentage share for each Participant for the Renewal Power Sales Contract will be determined based on many factors, including prior participation rates, number of final participants, and available percentages without commitment, among others.

CALIFORNIA PURCHASERS				
PURCHASER	SHARE TO BE DELIVERED	W/ EXCESS ENTITLEMENT SHARES (2015-12-18)	SHARE OF 1200 MW	SHARE OF 1200 MW PLUS ENTITLEMENT SHARES
Anaheim	13.225%	13.225%	159	159
Burbank	3.371%	4.167%	40	50
Glendale	1.704%	2.206%	20	26
LADWP	48.617%	66.785%	583	801
Pasadena	4.409%	6.000%	53	72
Riverside	7.617%	7.617%	91	91
GROUP TOTAL	78.943%	100.000%	947	1200
UTAH COOPERATIVE PURCHASERS				
GROUP TOTAL	7.017%	0.000%	84	0
UTAH MUNICIPAL PURCHASERS				
GROUP TOTAL	14.040%	0.000%	168	0
PURCHASER TOTAL	100.000%	100.000%	1200	1200

Figure 2 - Generation Distribution<sup>2</sup>

**Expected Deliverables:** Please refer to Figure 2

**Must Take Provisions:** Please refer to Figure 2

**Dispatch Provisions:** It is assumed that LADWP will continue its responsibilities as the Operating Agent for the repowered IPP units, and will continue to be responsible for the dispatch of the IPP units based on Participant and system demand.

**Unit Contingency:** N/A

**Expected Operating Profiles:**

A simulation of the load profile performed by LADWP staff is below in Figure 3 utilizing the GE configuration. The Siemens and Mitsubishi options will follow similar profiles as the heat rates and other

<sup>1</sup> The Project size per the Second Amendatory Power Sales Contract is limited to 1200 MW. The Generation Scenarios listed above are based on the available generation sizes from the 3 respective vendors.

<sup>2</sup> This is based on the assumption that Participant's shares will be equal to its current Generation Entitlement Share in the existing Power Sales Contracts, and Excess Power Sales Contracts

characteristics are comparable, with higher plant energy outputs. The load profile was used to derive the average estimated energy output per year as shown below

Energy Output (MWh): 6,635,768

The average annual capacity factor for all manufacturers is 63%.

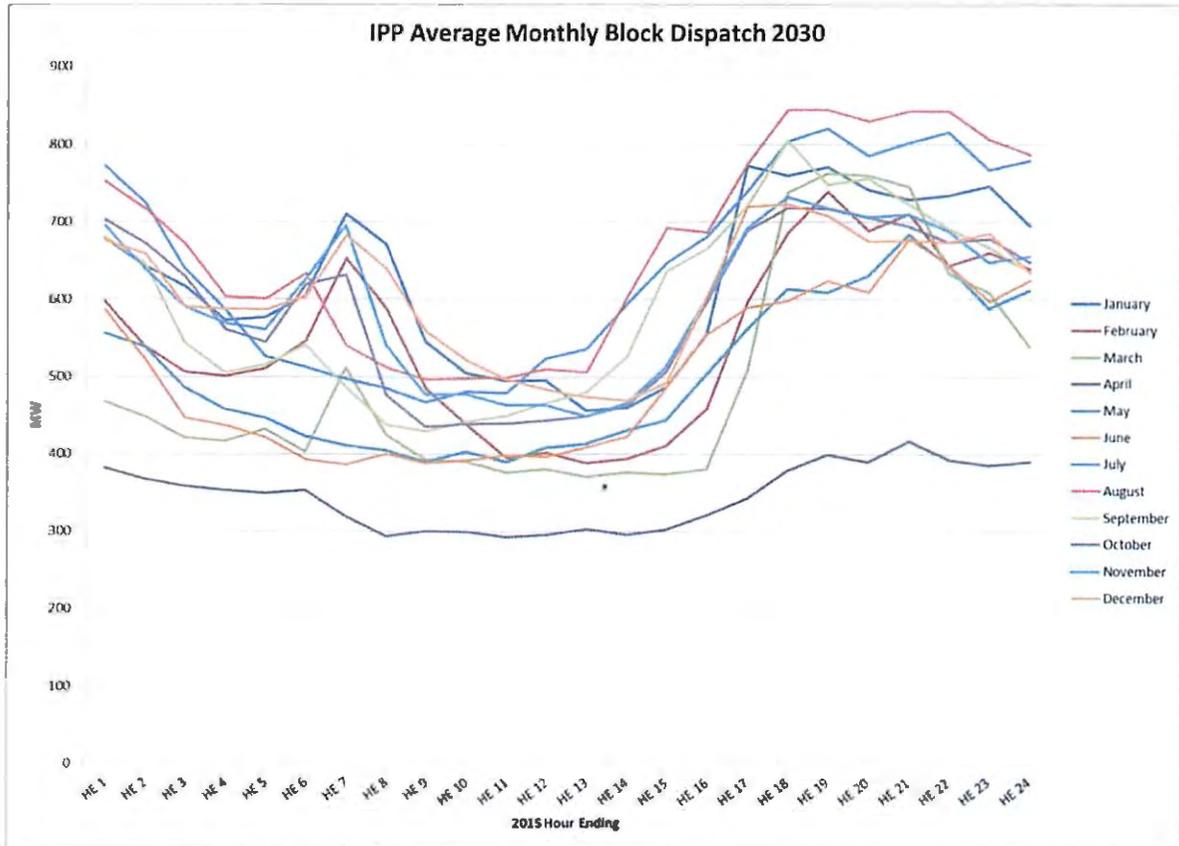


Figure 3 - Average Monthly Block Dispatch

**Expected Fuel Use Profile:**

Below is the preliminary fuel use data received from each respective vendor, estimated for the IPP site conditions.

<b>GE - Estimated Combined Cycle Heat Rate Data for IPP Repowering</b>								
All data estimated for site conditions, with duct firing, cooling towers								
<b>2x1 7F.04</b>								
Ambient Temperature °F		51	51	51	51	51	51	51
Duct Firing		On	Off	Off	Off	Off	Off	Off
Load		100%	90%	85%	80%	70%	60%	50%
Net Plant Output	MW	600	540	508	480	420	360	300
Heat Input (LHV)	MMBTU/h	3,669	3,214	2,981	2,828	2,501	2,192	1,908
CO2 Emissions	lbs/MWh	780	759	748	751	759	776	811

Figure 4 - GE Fuel Use Profile

<b>Siemens - Estimated Combined Cycle Heat Rate Data for IPP Repowering</b>								
All data estimated for site conditions, no duct firing, cooling towers								
<b>2x1 SCC6-5000F</b>								
Ambient Temperature °F		51	51	51	51	51	51	51
Load		100%	90%	80%	70%	60%	50%	40%
Net Plant Output	MW	616	563	511	461	411	361	310
Heat Input (LHV)	MMBTU/h	3,619	3,342	3,093	2,864	2,646	2,430	2,203
CO2 Emissions	lbs/MWh	759	767	782	803	832	870	918

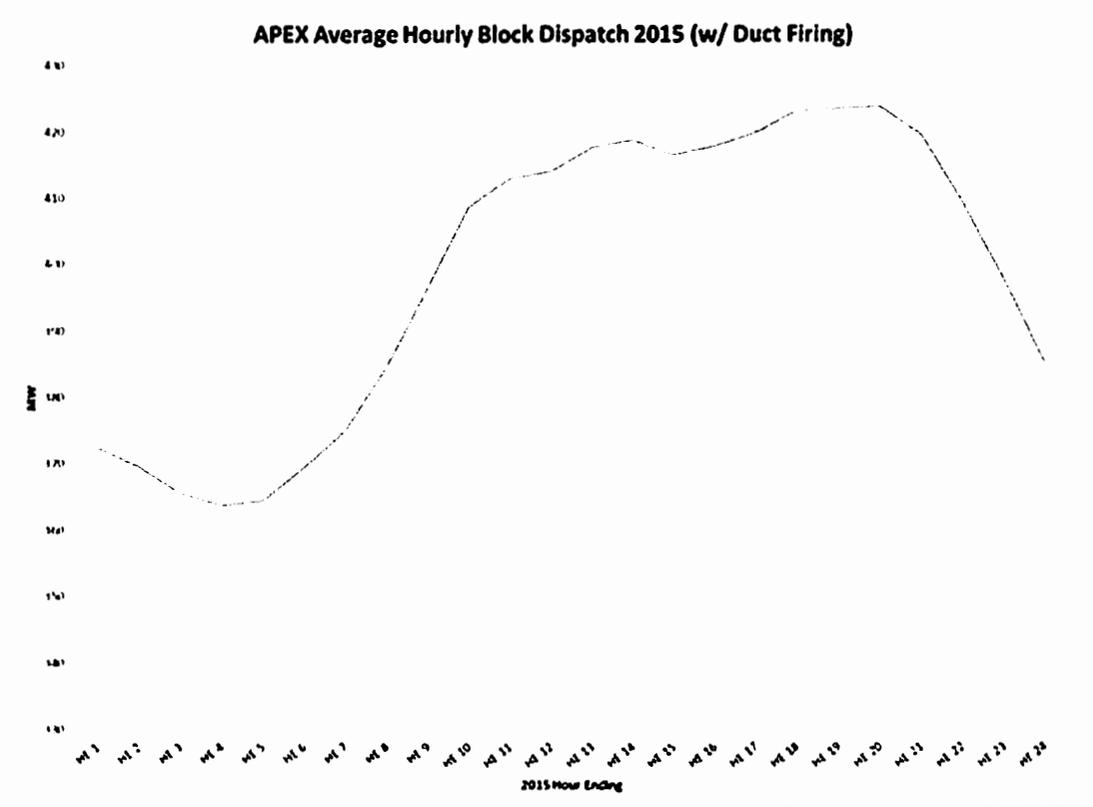
Figure 5 - Siemens Fuel Use Profile (received from vendors without derate)

<b>Mitsubishi - Estimated Combined Cycle Heat Rate Data for IPP Repowering</b>								
All data estimated for site conditions, no duct firing, cooling towers								
<b>2x 1 M501GAC</b>								
Ambient Temperature °F		105	105	95	95	47	47	12
Load		100%	55%	100%	55%	100%	55%	100%
Net Plant Output	MW	595	351	616	360	714	401	765
Heat Input (LHV)	MMBTU/h	3,480	2,276	3,606	2,348	4,150	2,552	4,492
CO2 Emissions	lbs/MWh	768	850	770	854	764	836	772

Figure 6 - Mitsubishi Fuel Use Profile (received from vendors without derate)

**Data from Existing Plant – Apex Generating Station**

Below in Figure 7 is data extracted from LADWP's Apex Generating Station located in Clark County, Nevada for the calendar year of 2015. The plant consists of a GE MS7000FA 527 MW 2x1 Combined Cycle generating station. The energy output for the plant in 2015 was 2,635,293 MWh, with a resultant capacity factor of 57%.



**Figure 7 - Apex 2015 Load Profile**

<b>Apex - Data</b>								
Load		100%	90%	80%	70%	60%	50%	40%
Net Plant Output	MW	480	432	384	336	288	240	192
CO2 Emissions	lbs/MWh	835	840	852	874	913	976	1,084
<b>Apex - Data (w/ Duct Firing)</b>								
Load		100%	97%	94%	91%			
Net Plant Output	MW	531	515	499	481			
CO2 Emissions	lbs/MWh	884	871	859	847			

**Figure 8 - Apex 2015 Fuel Use Profile**

Adopted  
10/18/16  
Friedman/Charpetian  
Absent: Devine

**RESOLUTION NO. 16-172**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF GLENDALE, CALIFORNIA  
RATIFYING AND APPROVING OF AN EMISSIONS PERFORMANCE STANDARD  
COMPLIANCE FILING FOR SUBMITTAL TO THE CALIFORNIA ENERGY COMMISSION IN  
CONNECTION WITH THE PROPOSED REPOWERING OF THE  
INTERMOUNTAIN POWER PROJECT**

**WHEREAS**, on August 6, 1980, the City of Glendale (Glendale) entered into an agreement (the Power Sales Contract) with the Intermountain Power Agency (IPA) to purchase a share of the coal-fired generation of the Intermountain Power Project (IPP); and

**WHEREAS**, on February 1, 1983, Glendale and IPA entered into an Amendatory Power Sales Contract as an amendment to the Power Sales Contract; and

**WHEREAS**, IPP has been operating as a coal-fired power plant for approximately 30 years owned by IPA and operated by the Los Angeles Department of Water & Power (LADWP) as the Project Manager and Operating Agent on IPA's behalf; and

**WHEREAS**, pursuant to Resolution No. 15-119 dated June 16, 2015, the City Council authorized the Second Amendatory Power Sales Contract amending the Amendatory Power Sales Contract, and further authorized the City Manager to enter into the Renewal Power Sales Contract and the Agreement for Sale of Renewal Excess Power (Renewal Contracts); and

**WHEREAS**, the Second Amendatory Power Sales Contract provides for the ability to repower IPP's fuel source from its current 1,800 megawatts (MWs) net of coal-fired generation to no more than 1,200 MWs of EPS-compliant natural gas-fired combined cycle generation; and

**WHEREAS**, IPA requires that the purchasers receive all required governmental regulatory approvals and other required consents or approvals (including all approvals required by Purchaser's governing bodies) before entering into the Renewal Contracts; and

**WHEREAS**, the proposed action is subject to the California Energy Commission's (CEC) Emission Performance Standard regulations (EPS Regulations; 20 CCR Section 2900 et seq.), including the requirement in 20 CCR 2909 that a publicly-owned utility submit a compliance filing with the CEC within 10 business days of entering into a "covered procurement" as therein defined (Compliance Filing); and

**WHEREAS**, the EPS Regulations require that the Compliance Filing be first approved by the City Council prior to submitting it to the CEC; and

**WHEREAS**, on October 4, 2016, at its regular City-Council meeting noticed in accordance with the Ralph M. Brown Act (Government Code Section 54950 et seq.), the City Council adopted a Resolution approving a CEC Compliance Filing and authorized submittal of the same to the CEC; and

**WHEREAS**, although the City Council's October 4, 2016 consideration of the CEC Compliance Filing was noticed under the Ralph M. Brown Act, Glendale did not provide the CEC and its master contact list with notice of the date, time and location of the meeting, as required under the EPS Regulations (20 CCR Section 2908); and

///

**WHEREAS**, in order to provide the requisite notices and to allow the public the opportunity to provide input regarding the CEC Compliance Filing, the City Council elected to reopen its deliberations on the Compliance Filing at its October 18, 2016 meeting and to consider, at such meeting, whether the Compliance Filing as approved on October 4, 2016 should be ratified, or whether such Compliance Filing should be amended; and

**WHEREAS**, Glendale has provided notice of the October 18, 2016 deliberations regarding the Compliance Filing in accordance with the CEC Regulations (20 CCR Section 2908); and

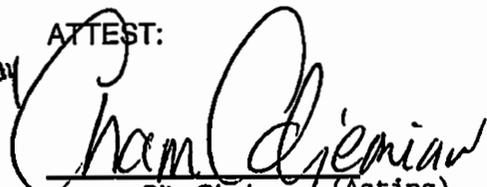
**WHEREAS**, based on the City Council's knowledge, information or belief, the Compliance Filing attached as Attachment 1 to the October 18, 2016 Report to the City Council, and on file with the City Clerk, does not contain a material misstatement or omission of fact and the Renewal Contracts comply with the EPS Regulations.

**NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF GLENDALE:**

1. that, having provided notice in accordance with Title 20 of the California Code of Regulations, Section 2908, and having considered any comments from interested members of the public, the Compliance Filing attached as Attachment 1 to the October 18, 2016 Report to City Council, and on file with the City Clerk, and approved as to form and legality by the City Attorney, be and the same is hereby approved and that the City Council's October 4, 2016 approval of the Compliance Filing is hereby ratified; and
2. that the General Manager of Glendale Water & Power or such other person as the General Manager shall designate in writing, is hereby authorized and directed to execute and submit the Compliance Filing and any and all other related documents and instruments to the CEC.

Adopted this 18th day of October, 2016

  
\_\_\_\_\_  
Mayor

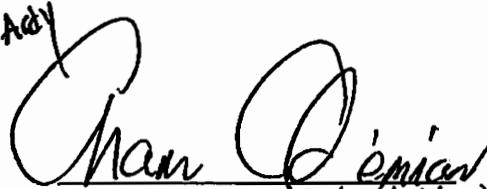
ATTEST:  
*For Ardy*  
  
\_\_\_\_\_  
City Clerk (Acting)

APPROVED AS TO FORM  
  
\_\_\_\_\_  
Principal Assistant City Attorney  
Date Oct. 11, 2016

STATE OF CALIFORNIA     )  
  ) SS  
COUNTY OF LOS ANGELES )

I, Ardashes Kassakhian, City Clerk of the City of Glendale, certify that the foregoing Resolution No. 16-172 was adopted by the Council of the City of Glendale, California, at a regular meeting held on the 18th day of October, 2016, by the following vote:

Ayes:       Friedman, Gharpetian, Siqanyan, Najarian  
Noes:       None  
Absent:     Devine  
Abstain:    None

*for Acty*  
  
City Clerk (Acting)

Adopted  
10/18/16  
Friedman/Gharpetian  
Absent: Devine

RESOLUTION NO. 16-173

**A RESOLUTION OF THE COUNCIL OF THE CITY OF GLENDALE, CALIFORNIA  
AMENDING AND APPROVING AN EMISSIONS PERFORMANCE STANDARD  
COMPLIANCE FILING FOR SUBMITTAL TO THE CALIFORNIA ENERGY COMMISSION IN  
CONNECTION WITH THE PROPOSED REPOWERING OF THE  
INTERMOUNTAIN POWER PROJECT**

**WHEREAS**, on August 6, 1980, the City of Glendale (Glendale) entered into an agreement (the Power Sales Contract) with the Intermountain Power Agency (IPA) to purchase a share of the coal-fired generation of the Intermountain Power Project (IPP); and

**WHEREAS**, on February 1, 1983, Glendale and IPA entered into an Amendatory Power Sales Contract as an amendment to the Power Sales Contract; and

**WHEREAS**, IPP has been operating as a coal-fired power plant for approximately 30 years owned by IPA and operated by the Los Angeles Department of Water & Power (LADWP) as the Project Manager and Operating Agent on IPA's behalf; and

**WHEREAS**, pursuant to Resolution No. 15-119 dated June 16, 2015, the City Council authorized the Second Amendatory Power Sales Contract amending the Amendatory Power Sales Contract, and further authorized the City Manager to enter into the Renewal Power Sales Contract and the Agreement for Sale of Renewal Excess Power (Renewal Contracts); and

**WHEREAS**, the Second Amendatory Power Sales Contract provides for the ability to repower IPP's fuel source from its current 1,800 megawatts (MWs) net of coal-fired generation to no more than 1,200 MWs of EPS-compliant natural gas-fired combined cycle generation; and

**WHEREAS**, IPA requires that the purchasers receive all required governmental regulatory approvals and other required consents or approvals (including all approvals required by Purchaser's governing bodies) before entering into the Renewal Contracts; and

**WHEREAS**, the proposed action is subject to the California Energy Commission's (CEC) Emission Performance Standard regulations (EPS Regulations; 20 CCR Section 2900 et seq.), including the requirement in 20 CCR 2909 that a publicly-owned utility submit a compliance filing with the CEC within 10 business days of entering into a "covered procurement" as therein defined (Compliance Filing); and

**WHEREAS**, the EPS Regulations require that the Compliance Filing be first approved by the City Council prior to submitting it to the CEC; and

**WHEREAS**, on October 4, 2016, at its regular City-Council meeting noticed in accordance with the Ralph M. Brown Act (Government Code Section 54950 et seq.), the City Council adopted a Resolution approving a CEC Compliance Filing and authorized submittal of the same to the CEC; and

**WHEREAS**, although the City Council's October 4, 2016 consideration of the CEC Compliance Filing was noticed under the Ralph M. Brown Act, Glendale did not provide the CEC and its master contact list with notice of the date, time and location of the meeting, as required under the EPS Regulations (20 CCR Section 2908); and

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**WHEREAS**, in order to provide the requisite notices and to allow the public the opportunity to provide input regarding the CEC Compliance Filing, the City Council elected to reopen its deliberations on the Compliance Filing at its October 18, 2016 meeting and to consider, at such meeting, whether the Compliance Filing as approved on October 4, 2016 should be ratified, or whether such Compliance Filing should be amended; and

**WHEREAS**, Glendale has provided notice of the October 18, 2016 deliberations regarding the Compliance Filing in accordance with the CEC Regulations (20 CCR Section 2908); and

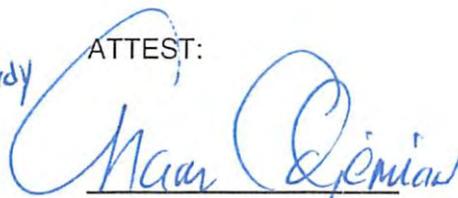
**WHEREAS**, based on the City Council's knowledge, information or belief, the Compliance Filing attached as Attachment 1 to the October 18, 2016 Report to the City Council, and on file with the City Clerk, does not contain a material misstatement or omission of fact and the Renewal Contracts comply with the EPS Regulations.

**NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF GLENDALE:**

1. that, having provided notice in accordance with Title 20 of the California Code of Regulations, Section 2908, and having considered any comments from interested members of the public, the Compliance Filing attached as Attachment 1 to the October 18, 2016 Report to City Council, and on file with the City Clerk, and approved as to form and legality by the City Attorney, be and the same is hereby amended as follows:
2. that the Compliance Filing, as amended, is hereby approved and the General Manager of Glendale Water & Power or such other person as the General Manager shall designate in writing, is hereby authorized and directed to execute and submit the Compliance Filing and any and all other related documents and instruments to the CEC.

Adopted this 18th day of October, 2016

  
\_\_\_\_\_  
Mayor

For Ardy  
ATTEST:  
  
\_\_\_\_\_  
City Clerk (Acting)

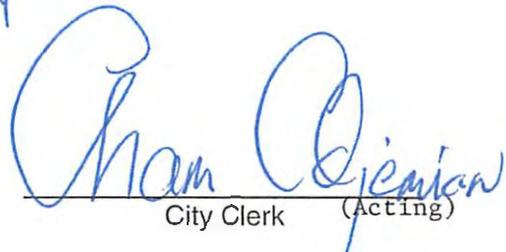
APPROVED AS TO FORM  
  
\_\_\_\_\_  
Principal Assistant City Attorney  
Date Oct. 11, 2016

STATE OF CALIFORNIA     )  
  ) SS  
COUNTY OF LOS ANGELES )

I, Ardashes Kassakhian, City Clerk of the City of Glendale, certify that the foregoing Resolution No. 16-173 was adopted by the Council of the City of Glendale, California, at a regular meeting held on the 18th day of October, 2016, by the following vote:

Ayes:     Friedman, Gharpetian, Sinanyan, Najarian  
Noes:     None  
Absent:   Devine  
Abstain:   None

*For Ardy*

  
\_\_\_\_\_  
City Clerk     (Acting)

ATTACHMENT C

CALIFORNIA ENERGY COMMISSION  
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING  
COMPLIANCE FILING ATTESTATION

I, the official named below, certify under penalty of perjury, the following:

1. I am an agent of the City of Glendale (Glendale) authorized by the Glendale City Council (Council) to sign this attestation on its behalf;
2. The Council has reviewed and approved in noticed public meetings both the covered procurement (on June 16, 2015) and the Compliance Filing (on October 18, 2016) to which this attestation is attached;
3. Based on the Council's knowledge, information, and belief, the Compliance Filing does not contain a material misstatement or omission of fact;
4. Based on the Council's knowledge, information, or belief, the covered procurement complies with Title 20, Division 2, Chapter 11, Article 1 of the California Code of Regulations; and
5. The covered procurement contains the contractual terms or conditions specifying that the contract or commitment is void and all energy deliveries shall be terminated no later than the effective date of any CEC decision pursuant to 20 CCR § 2910 that the covered procurement fails to comply with 20 CCR § 2900 *et seq.*

Executed this 19th day of October, 2016, at Glendale, California.

  
APPROVED AS TO FORM  
Principal Assistant City Attorney  
Date Oct 18, 2016

  
Stephen M. Zurn  
General Manager, Glendale Water & Power  
City of Glendale

**CALIFORNIA ENERGY COMMISSION**

1516 Ninth Street  
 Sacramento, California 95814

**STATE OF CALIFORNIA  
 ENERGY RESOURCES CONSERVATION  
 AND DEVELOPMENT COMMISSION**

IN THE MATTER OF:	)	DOCKET NO. 16-EPS-01
	)	[PROPOSED] ORDER No.
	)	
CITY OF GLENDALE EMISSION PERFORMANCE	)	
STANDARD COMPLIANCE FILING	)	
	)	

### I. INTRODUCTION

Pursuant to Public Utilities Code section 8341(e)(1), the Energy Commission established a greenhouse gases emission performance standard (EPS) of 1,100 pounds carbon dioxide per megawatt hour, as codified in Title 20 of the California Code of Regulations, sections 2900 *et seq.* The Energy Commission is responsible for reviewing all long-term financial commitments entered into by local publicly owned electric utilities for compliance with the EPS.

### II. FINDINGS

a. On October 19, 2016, the City of Glendale (Glendale) submitted a compliance filing requesting that the Energy Commission find that Glendale's Second Amendatory Power Sales Contract (contract) with the Intermountain Power Agency (IPA) for electricity from the Intermountain Power Project (IPP) Repowering Project (Project), which involves converting the existing coal facility to natural gas, be determined to be compliant with the EPS;

b. On October 28, 2016, Energy Commission staff submitted a review of Glendale's filing and found it complete. Based on its review, staff recommended that the procurement be found to be in compliance with the EPS; and

c. The Energy Commission concurs with staff's recommendation that Glendale's compliance filing is complete and that the contract with IPA, as described in the compliance filing, complies with the EPS.

### III. CONCLUSION AND ORDER

The California Energy Commission hereby adopts staff's recommendation and orders that the long-term financial commitment described in Glendale's compliance filing complies with the Energy Commission's Greenhouse Gases Emission Performance Standard, as codified in Title 20 of the California Code of Regulations, sections 2900 *et seq.* Should the final design significantly change from the specifications provided in the compliance filing, and Glendale does not terminate its interest in IPP, Glendale must submit a subsequent compliance filing providing the updated information.

## CERTIFICATION

The undersigned Secretariat to the Commission does hereby certify that the foregoing is a full, true, and correct copy of an order duly and regularly adopted at a meeting of the California Energy Commission held on November 9, 2016.

AYE:

NAY:

ABSENT:

ABSTAIN:

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Cody Goldthrite, Secretariat  
California Energy Commission