

Stakeholder Comments
Regional Integration California GHG Compliance Workshop
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Submitted by	Company	Date Submitted
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Los Angeles Department of Water & Power (LADWP) appreciates the opportunity to provide comments.

The current solution methodology of the EIM does leave open the possibility that the algorithm will artificially attribute relatively low emission energy to California and replace it with higher emitting generation outside of California, thus increasing CO2 beyond the California cap from a global perspective (leakage).

LADWP strongly supports the initiative to fix the algorithm to ensure that this leakage does not occur.

LADWP believes that further research should be performed on the proposed options with sufficient EIM data available in the future.