



ANTONIO R. VILLARAIGOSA
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General Manager

April 1, 2011

Mr. Philip Isorena
Chief Deputy Director
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Isorena:

Subject: Submittal of the Los Angeles Department of Water and Power's (LADWP's) Once-Through-Cooling (OTC) Implementation Plan as Required by the Final OTC Policy

Enclosed please find LADWP's OTC Implementation Plan, as required by the Final OTC Policy, which was adopted on May 4, 2010, and became effective on October 1, 2010. Seven hard copies and discs, one for each Statewide Advisory Committee on Cooling Water Intake Structures member are enclosed.

In 2010, LADWP proposed a facility-based compliance plan targeted to achieve the 83.7 percent OTC reduction standard. However, on May 4, 2010, the State Water Resources Control Board (SWRCB) adopted a Policy that eliminated the opportunity to use the facility-wide basis and required a unit-by-unit compliance, while maintaining the same compliance dates stipulated in the March 2010 draft Policy.

The enclosed implementation plan schedule is necessary to address the shift from facility-based compliance to unit-by-unit compliance. Herein as described in the Plan, dates other than those proposed by LADWP would result in serious and detrimental impacts to system reliability. LADWP supports the goals of the Policy; our proposed schedule will ensure 100% elimination of OTC, and maintains electric system reliability for our customers.

Water and Power Conservation ... a way of life

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If additional information is required, please contact Ms. Lorraine A. Paskett at (213) 367- 0926 or Ms. Katherine Rubin at (213) 367-0436.

Sincerely,



Ronald O. Nichols
General Manager

JP:db

Enclosure

By Federal Express and Email

c: Mr. Charles R. Hoppin, Chair, State Water Resources Control Board (SWRCB)
Ms. Frances Spivy-Weber, Vice Chair, SWRCB
Ms. Tam M. Doduc, Board Member, SWRCB
Mr. Thomas Howard, Executive Director, SWRCB
Mr. Jonathan S. Bishop, SWRCB
Mr. Dominic Gregorio, Chief, Ocean Unit, SWRCB
Ms. Joanna Jensen, Division of Water Quality, SWRCB
Ms. Lorraine A. Paskett
Ms. Katherine Rubin