Agenda Report

October 10, 2016

TO: Honorable Mayor and City Council

THROUGH: Municipal Services Committee (September 27, 2016)

FROM: Water and Power Department

SUBJECT: **APPROVE CALIFORNIA ENERGY COMMISSION ("CEC") SENATE BILL ("SB") 1368 EMISSION PERFORMANCE STANDARDS COMPLIANCE FILING FOR THE INTERMOUNTAIN POWER PROJECT ("IPP") REPOWERING PROJECT**

RECOMMENDATION:

It is recommended that the City Council:

1. Find that the proposed action is not a project subject to the California Environmental Quality Act (CEQA) pursuant to Section 21065 of CEQA and Sections 15060 (c)(2), 15060 (c)(3), and 15378 of the State CEQA Guidelines and, as such, no environmental document pursuant to CEQA is required for the project; and

2. Authorize the Interim General Manager of Pasadena Water and Power to submit the CEC SB 1368 Emission Performance Standards compliance filing for the IPP Repowering Project.

EXECUTIVE SUMMARY:

Pasadena Water and Power ("PWP") has a long term power purchase contract with Intermountain Power Agency ("IPA") for the IPP coal-fired power plant located near Delta, Utah. This power purchase contract also provides for transmission service that enables energy delivery to Pasadena. The other purchasers include five California publicly owned utilities (Anaheim, Burbank, Glendale, Los Angeles Department of Water and Power, and Riverside), along with 23 Utah municipalities, and six rural electric cooperatives. The current contract expires on June 15, 2027. All of the IPP purchasers, including PWP, wish to extend their transmission rights to access the renewable and conventional energy resources in or around Delta, and most current participants wish to build a new natural gas-fired electric generation project ("Renewal Project") to replace the existing coal plants.

Last year on July 20th, the City Council authorized the City Manager to execute an amendment to the existing power purchase contract to allow for construction of the Renewal Project. Additionally, the City Council authorized PWP to participate in the Renewal Project up to 40MW. The Renewal Power Sales Contract ("RPSC") needs to be executed for PWP to be able to participate in the Renewal Project post June 15, 2027. The RPSC includes an option for PWP to terminate the contract and exit the Renewal Project if exercised by August 3, 2019. Pasadena and other California utilities may not execute the RPSC until the CEC verifies that the new power plant will be compliant with the California emission standards pursuant to Senate Bill ("SB") 1368. PWP and other California participants have recently become aware that IPA and LADWP consider the CEC approval as a prerequisite for executing the RPSC. CEC approval does not affect PWP's option to exit the Renewal project by August 3, 2019.

Therefore, PWP is now seeking approval to submit a compliance filing to the CEC for the IPP Repowering Project as required by SB1368, also known as the California Emission Performance Standards. SB1368 limits California electric utilities from entering into new or renewed long-term contracts for the purchase of power from baseload generation power plants that exceed an emission performance standard of 1,100 pounds of carbon dioxide ("CO_2") per megawatt-hour ("MWh"). IPP is considered a baseload generation power plant because it has historically produced electricity at greater than 60 percent of its maximum annual capacity. Thus, for California participants involved in IPP, including the City of Pasadena, to renew the existing Power Sales Contracts which expire on June 15, 2027, the generating units must be converted from coal to an alternative that is compliant with the Emission Performance Standards.

On March 16, 2016, the Second Amendatory Power Sales Contract, which was previously approved by the Pasadena City Council, went into effect, allowing for the repowering of IPP's coal-fired generating units with Emission Performance Standards compliant combined-cycle natural gas-fired units ("the Project").

Per contractual provisions, purchasers of IPP's energy beyond June 15, 2027 must obtain necessary regulatory approvals prior to entering into the Renewal Power Sales Contracts and the Agreement for Sale of Renewal Excess Power ("Renewal Contracts"). The Renewal Contracts provide for the procurement of electricity from the Project through 2077.

BACKGROUND:

IPP, which is owned by the Intermountain Power Agency, a political subdivision of the State of Utah, consists of a 1,800 MW coal-fired power plant located near Delta, Utah. PWP and five other California publicly owned utilities (Anaheim, Burbank, Glendale, the LADWP, and Riverside), along with 23 Utah municipalities, and six rural electric cooperatives, currently purchase power from IPP under the existing Power Sales Contracts. Because IPP is a joint project, the concurrence of all participants was required to amend the existing contracts.

LADWP, as IPP's Operating Agent, led the strategic planning efforts to negotiate the agreements that will allow for the repowering of IPP from its current 1,800 MW of coal-fired generation to no more than 1,200 MW of Emission Performance Standards compliant natural gas-fired generation. The Project is authorized pursuant to the provisions of the Second Amendatory Power Sales Contract, which was approved by this City Council on July 20, 2015. As part of that approval process, the City Manager was also authorized to enter into the Renewal Contracts later offered by the Intermountain Power Agency.

The Project will include the construction and installation of two natural gas-fired combined cycle units, each with a design capacity of approximately 600 megawatts ("MW") and expected carbon dioxide CO_2 emissions of approximately 800 pounds CO_2 per MWh, as compared to coal-fired generation which emits roughly 2,000 pounds CO_2 per MWh. The reduction of the total plant output from 1,800 MW to 1,200 MW, and the conversion to natural gas, will result in the elimination of approximately 14.9 billion pounds of CO_2 each year as a result of the repowering.

One goal of the Project is to accelerate PWP's complete coal divestiture by July 1, 2025, approximately two years earlier than originally dictated by contract. The ability to replace the coal units two years earlier than originally planned is contingent upon several factors, including permitting, material procurement and final concurrence of all participants. Although the participants are planning to complete the Project by 2025, the commercial operation date may be delayed due to circumstances beyond Pasadena's control.

Once the Second Amendatory Power Sales Contract became effective on March 16, 2016, the Intermountain Power Agency then offered the Renewal Contracts for the participants' consideration. These Renewal Contracts will allow the participants to continue participating in IPP as a repowered Emission Performance Standards compliant natural gas facility through June 15, 2077. The participants are required to obtain their respective regulatory approvals prior to moving forward with the Renewal Contracts.

In accordance with the California Code of Regulations, Title 20, Sections 2908 and 2909, the CEC requires a public notice of deliberation and a subsequent compliance filing for entering into a covered procurement, which includes any new or renewed contract for the procurement of electricity from a baseload power plant with a term of five years or more. PWP satisfied the requirements for a public notice of deliberation which took place at the July 20, 1015 City Council meeting. In conjunction with entering into the Renewal Contracts, PWP wishes to submit this subsequent filing, approved by the City Council, to the CEC for a determination that the Project will be compliant with the Emission Performance Standards.

If approved, PWP will submit a compliance filing to the CEC pursuant to the California Code of Regulations, Title 20, Section 2909, as adopted by the CEC to implement SB 1368. The CEC will then evaluate the Project and verify its compliance with the

Emission Performance Standards. The compliance filing is not technically required unless and until Pasadena decides to remain in the Project, rather than exercise its option to terminate the Renewal Contracts in 2019. However, the Intermountain Power Agency, which owns IPP, and the Los Angeles Department of Water and Power ("LADWP"), which is the Operating Agent for IPP, have requested that all of the potential project participants make their filings now, and the CEC does not object. Therefore, PWP is requesting the authorization to submit the attached compliance filing documentation to the CEC.

CITY COUNCIL POLICY CONSIDERATION:

The recommended action is consistent with the Urban Environmental Accords Goal to reduce greenhouse gas emissions, the City Council's strategic goals to increase conservation and sustainability, and the 2015 Power Integrated Resource Plan.

ENVIRONMENTAL ANALYSIS:

The approval of the IPP Repowering Project Emission Performance Standards compliance filing is an administrative action that would not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. Therefore, the proposed action is not a "project" subject to CEQA, as defined in Section 21065 of CEQA and Section 15378 of the State CEQA Guidelines. Since the action is not a project subject to CEQA, no environmental document is required.

FISCAL IMPACT:
This compliance filing satisfies a regulatory requirement at no cost to PWP. There is no fiscal impact as a result of this action, and it will not have any indirect or support cost requirements. The anticipated impact to other operational programs or capital projects as a result of this action will be none.

Respectfully submitted,

GURCHARAN BAWA
Interim General Manager
Water and Power Department

Prepared by:

Leesa S. Nayudu
Resource Planning Manager
(Power Supply)

Approved by:

STEVE MERMELL
City Manager

ATTACHMENTS:
Attachment 1 – Letter to CEC
Attachment 2 – Project Description
Attachment 3 – Attestation

ATTACHMENT 1

PASADENA WATER AND POWER

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

Re: Pasadena Emission Performance Standard Compliance Filing for the Intermountain Power Project ("IPP") Repowering Project

Dear Sir or Madam:

Summary

The City of Pasadena hereby submits the attached Compliance Filing package, seeking California Energy Commission ("CEC") approval of the Compliance Filing for the IPP Repowering as required by 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. The Los Angeles Department of Water and Power ("LADWP") is IPA's Project Manager and Operating Agent for IPP. The City of Pasadena, along with LADWP and other municipal and cooperative entities ("Purchasers"), buy IPP's energy.

IPA and the Purchasers are now pursuing the IPP Repowering Project ("Project"), which is scheduled to replace IPP's coal generating units with CEC 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, 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 participants are planning to complete the repowering project by 2025, the commercial operation date may be delayed due to circumstances beyond Pasadena's control.

This repowering will result in the City of Pasadena's complete divestiture of all coal based fuel in its portfolio of generation resources. If this Compliance Filing is not approved by the CEC, the IPP Repowering Project will not proceed, and the existing IPP coal generating units will continue to generate energy until June 15, 2027, and potentially beyond.

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. The Purchasers include 23 Utah municipalities, six rural electric cooperatives, and six California municipalities as follows:

UTAH MUNICIPAL PURCHASERS:	UTAH COOPERATIVE PURCHASERS:	CALIFORNIA PURCHASERS:
Beaver	Bridger Valley REA	Anaheim
Bountiful	Dixie-Escalante REA	Burbank
Enterprise	Flowell Electric Assoc.	Glendale
Ephraim	Garkane Power Assoc.	LADWP
Fairview	Moon Lake Elec. Assoc.	Pasadena
Fillmore	Mt. Wheeler Power, Inc.	Riverside
Heber		
Holden		
Hurricane		
Hyrum		
Kanosh		
Kaysville		
Lehi		
Logan		
Meadow		
Monroe		
Morgan		
Mt. Pleasant		
Murray		
Oak City		
Parowan		
Price		
Spring City		

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 LADWP, have the right to terminate the contracts or to reduce their Generation Entitlement Share no later than November 1, 2019. Once they become effective under their terms, the Second Amendatory Power Sales Contract and the Renewal Contracts constitute binding obligations (Section 20.1 of each agreement), regardless of any termination right (Second Amendatory Power Sales Contract Section 42.1).

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 and the Purchasers are now pursuing entering into Renewal Contracts, which would allow for energy procurement from the 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 the attached Project Description.

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, the City of Pasadena hereby submits the attached Compliance Filing. In submitting this filing, the City of Pasadena respectfully requests that the CEC determine that the IPP Repowering Project pursuant to the Second Amendatory Power Sales Contract is in compliance with the EPS regulations promulgated by the CEC.

The City of Pasadena is subject to the EPS Regulations for the following reasons:

- Pasadena Water and Power, a department of the City of Pasadena, is a local publicly owned electric utility as defined in Public Utilities Code Section 9604.

- The proposed 1,200 MW Intermountain Power Renewal Project will involve a powerplant larger than 10 MW subject to the EPS Regulations, §2900 (Provisions Applicable to Powerplants 10 MW and Larger).

- The proposed Intermountain Power Renewal Project is expected to be baseload generation, designed and intended to provide electricity at an annualized plant capacity factor greater than 60 percent.

- The fifty-year Renewal Power Sales Contract with the Intermountain Power Agency is a covered procurement because it is a new contract commitment for the procurement of electricity with a term of five years or greater under a multiparty agreement that will include several local publicly owned electric utilities, including the City of Pasadena, with a baseload generation powerplant that is not "deemed" compliant.

    - The IPP Renewal Project will be a combined cycle natural gas powerplant, but was not in operation or granted a certificate by the Commission pursuant to Chapter 6 of the Warren-Alquist State Energy Resources Conservation and Development Act on or before June 30, 2007.

    - The IPP Renewal Project will not be a renewable electricity generation facility as defined in Chapter 8.6 of Division 15 of the Public Resources Code and as specified by guidelines adopted thereunder.

    - The IPP Renewal Project will not utilize biomass fuels that would otherwise be disposed of utilizing open burning, forest accumulation, spreading, composting, uncontrolled landfill, or landfill utilizing gas collection with flare or engine. Biomass includes but is not limited to agricultural waste, wood waste, and landfill gas.

    - The IPP Renewal Project will be neither a hydroelectric nor nuclear powerplant.

On July 20, 2015, the Pasadena City Council, at a noticed public meeting consistent with the requirements of the Ralph M. Brown Act ("Brown Act" Cal. Govt. Code § 54950 *et seq.*) 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. The Second Amendatory Power Sales Contract ultimately went into effect on March 16, 2016. At the same July 20, 2015 meeting, the City Council approved and authorized the execution and delivery of the Renewal Contracts which provide for the procurement of electricity from the Project until 2077, consistent with 20 CCR § 2908.

The CEC Compliance Filing/Project Description is provided as Attachment A. Attachment B 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 the following representative of the City of Pasadena, Department of Water and Power: Leesa Nayudu, (626) 744-7493, LNayudu@CityofPasadena.net

Sincerely,

Gurcharan Bawa
Interim General Manager
Pasadena Water and Power

Attachments

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*
* The ability to meet this date is contingent upon several factors, including permitting, material procurement and final concurrence of all participants. The commercial operation date may be delayed due to circumstances beyond Pasadena's control.

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_2 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_2 emissions for site conditions, (lbs/MWh)	744, with duct firing	759	768
Estimated CO_2 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[1]

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 ENTITLMENT 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[2]

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

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[1] 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.

[2] 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

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 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%.

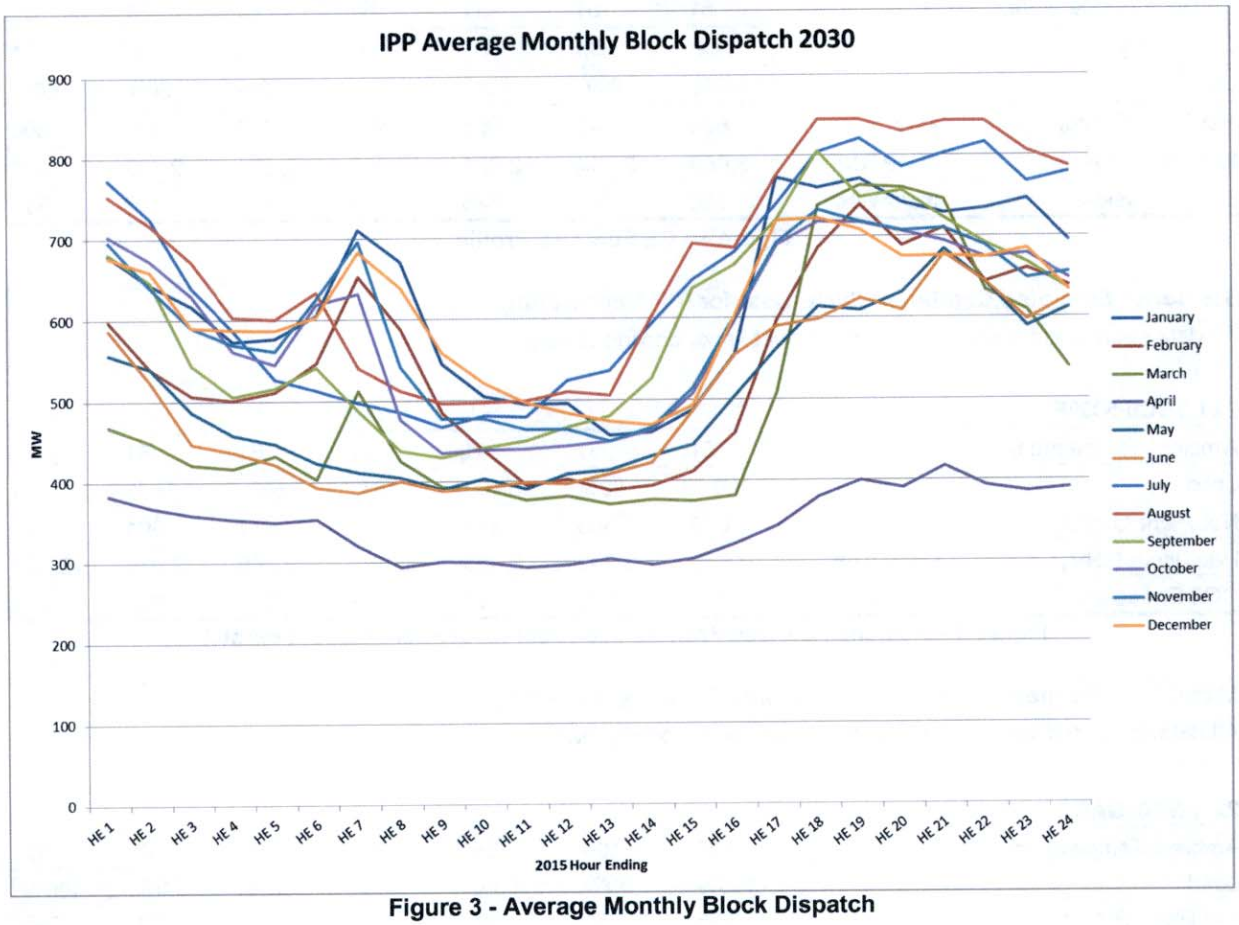

Figure 3 - Average Monthly Block Dispatch

Expected Fuel Use Profile:

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

GE - Estimated Combined Cycle Data for IPP Repowering All data estimated for site conditions, with duct firing, cooling towers								
2x1 7F.04								
Ambient Temperature	°F	51	51	51	51	51	51	51
Duct Firing		On	On	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

Siemens - Estimated Combined Cycle Data for IPP Repowering All data estimated for site conditions, no duct firing, cooling towers								
2x1 SCC6-5000F								
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)

Mitsubishi - Estimated Combined Cycle Data for IPP Repowering All data estimated for site conditions, no duct firing, cooling towers								
2x 1 M501GAC								
Ambient Temperature	°F	105	105	95	95	47	47	12	12
Load		100%	55%	100%	55%	100%	55%	100%	50%
Net Plant Output	MW	595	351	616	360	714	401	765	427
Heat Input (LHV)	MMBTU/h	3,480	2,276	3,606	2,348	4,150	2,552	4,492	2,716
CO2 Emissions	lbs/MWh	768	850	770	854	764	836	772	834

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%.

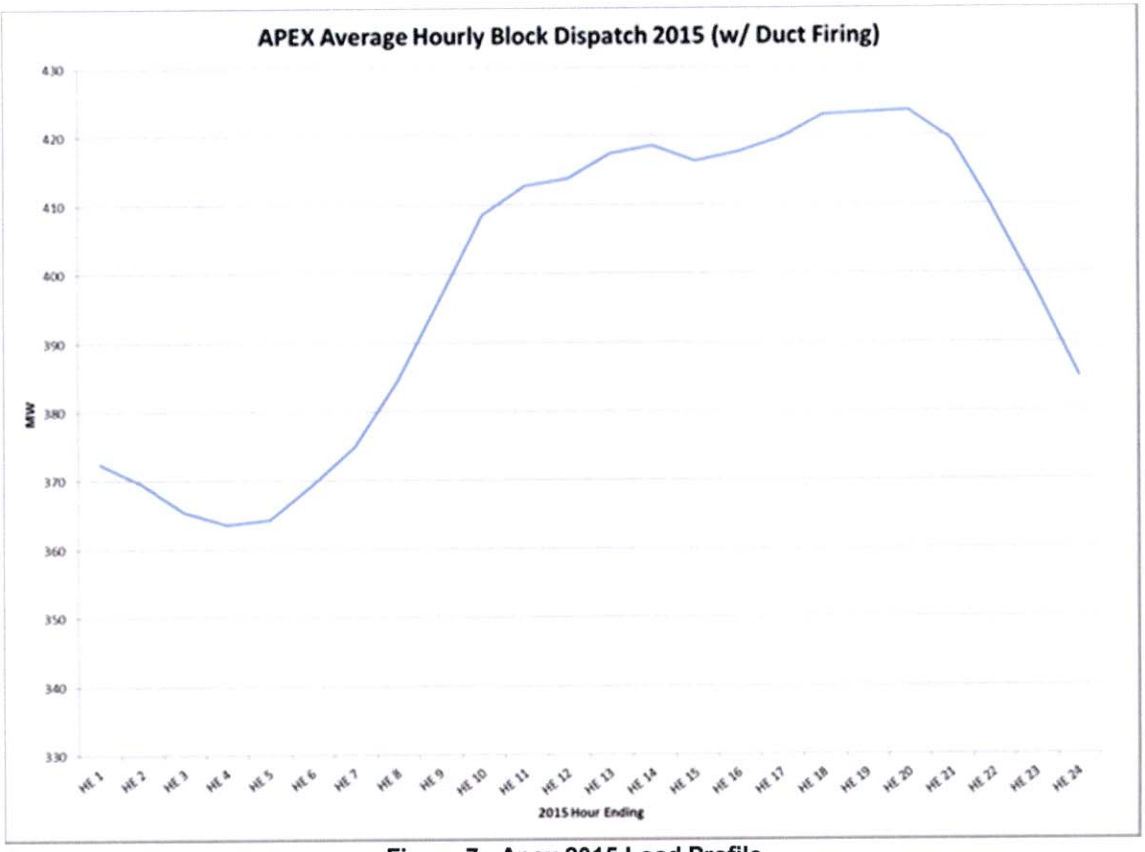

Figure 7 - Apex 2015 Load Profile

Apex - Data									
Load		100%	90%	80%	70%	60%	50%	40%	30%
Net Plant Output	MW	531	478	425	372	319	266	212	192
CO2 Emissions	lbs/MWh	884	835	841	856	886	939	1,031	1,084

Figure 8 - Apex 2015 Fuel Use Profile

ATTACHMENT B

CALIFORNIA ENERGY COMMISSION
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING
ATTESTATION

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

1. I am an agent of the City of Pasadena authorized by its City Council to sign this attestation on its behalf;

2. The City Council has reviewed and approved in noticed public meetings both the covered procurement (on July 20, 2015) and the Compliance Filing (on October 10, 2016) to which this attestation is attached;

3. Based on the City Council's knowledge, information, and belief, the Compliance Filing does not contain a material misstatement or omission of fact;

4. Based on the City 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 __th day of _____, 2016, at Pasadena, California.

_____
GURCHARAN BAWA
Interim General Manager
Pasadena Water & Power