

 **MOYES SELLERS & HENDRICKS**

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August 26, 2011

Via US Mail and Email
Post2017BCP@WAPA.gov

Mr. Darrick Moe
Western Area Power Administration
Desert Southwest Regional manager
P.O. Box 6457
Phoenix, AZ 85005-6457

Re: Post 2017BCP; Comments of Affected Hoover Customers

Dear Mr. Moe:

By its federal register notice of April 27, 2011, Western announced Western's decisions to apply the EPAMP Power Marketing Initiative to the Boulder Canyon Project for a 30 year contract term, and certain other decisions and proposals. These comments regarding that federal register notice are submitted on behalf of Tonopah Irrigation District, Harquahala Valley Power District, Electrical District Number Eight, Aguila Irrigation District, McMullen Valley Water Conservation & Drainage District, and the City of Safford, all of which purchase Boulder Canyon Project power through the Arizona Power Authority.

Our efforts on behalf of our clients' interests in the post-2017 reallocation of Boulder Canyon Project power have been and remain focused on the passage of the pending Congressional legislation, which we consider to be the proper method for such reallocation, both legally and politically. We believe that if Western proceeds as it proposes, litigation is inevitable, and that Congressional action will ultimately be necessary in any event to conclude the federal reallocation process. While such matters do require time to implement, we do not believe that the timing requirements presently mandate Western's holding to the proposed December 31, 2011 effective date of its announced decisions.

Therefore, we continue to respectfully but strongly urge Western to further postpone such effective date in order to allow time for the pending legislation, which has passed full committees in both the House and the Senate, to become law. That will make it unnecessary for Western to incur further burden and expense (ultimately born by its customers) of its proposed administrative reallocation process.

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Thank you for the opportunity to comment on this very important matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay I. Moyes". The signature is written in a cursive, flowing style.

Jay I. Moyes

JIM/lkk

cc: Jeff Woner
Jim Downing
Elizabeth Story
David Kincaid
Dennis Delaney
Arizona Congressional Delegation