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January 11, 2013

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

Dear Mr. Moe,

Avra Water is a member owned, not-for-profit, water co-op located west of Tucson in unincorporated Pima County. We service approximately 2,600 water connections with a total population of approximately 9,700 low to middle income residents. We are very interested in obtaining an allocation of power from the Post – 2017 Resource Pool and believe, based on the Federal Register Notice dated Tuesday, October, 30, 2012, that we would be eligible. I would like to address a few comments/concerns on behalf of Avra Water that I do have, having read the FRN.

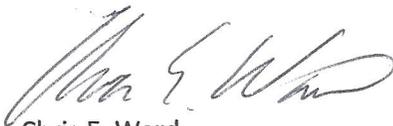
Per the eligibility criteria, “the minimum allocation will be 1,000 kW”. Currently we use approximately 600 to 700 kW annually which can greatly fluctuate due to weather conditions. As an example, our usage was down for 2012 due to the abundance of rain during the summer monsoon season. 2011 would have had a greater use as we had very little precipitation that year. The Q & A from the Public Information Forums states “the most recent calendar year load information will be required for the application”. It goes on to state that if the call for applications is the summer of 2013, then “Western would be seeking calendar year 2012 load information”. I would think that electrical utilities, irrigation districts and other water utilities would all have the same issue, and my hope would be that Western would give some consideration to that; perhaps an average use over three to five years.

That said, we would still be below the minimum allocation of 1,000 kW. The FRN also states that “Applicants will be allowed to aggregate their loads to meet minimum requirement provided Western is able to schedule power deliveries in quantities of 1,000 kW or greater to the aggregated group. Western will consider making allocations under the 1000 kW minimum conditioned upon an applicant’s

ability to aggregate to 1000 kW or greater for scheduling purposes prior to final allocation determinations". Being that we are an Arizona entity, and all power will be going through the Arizona Power Authority to be transmitted to Arizona allottees, wouldn't that make our load aggregated? It is my understanding that the APA has no minimum allocation requirement, so would this even be an issue for those of us with a requirement under the minimum? Considering the existing contracts and those in southern Arizona that are applying as new applicants, there shouldn't be a problem scheduling power deliveries in quantities of 1,000 kW or greater. Would that be considered enough to be a joint aggregation for those of us requiring a less than minimum load? You also mentioned in the Q & A that it "may be possible to address less or more than whole megawatt allocations through scheduling requirements in contracts. Western has proposed to address this issue at the allocation stage through the proposed marketing criteria, but will consider comments on alternatives prior to making a final decision."

I appreciate your time, and am hopeful you will consider my comments regarding the criteria.

Respectfully,

A handwritten signature in cursive script, appearing to read "Chris E. Ward".

Chris E. Ward
General Manager