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January 9, 2013

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

Subject: Comments concerning the allocation of Federal power from the Boulder Canyon Project

Dear Mr. Moe:

Thank you for this opportunity to comment on the proposed allocation of Boulder Canyon Project energy to new allottees. The City of Las Vegas (City) is concerned that it will be given the lowest priority consideration.

We respectfully request that Western Area Power Administration (Western) reconsider its prioritization schedule as detailed within the Federal Register, dated October 30, 2012, and simply consider the broad base of customers that can be affected by efficiently spreading the benefits of Boulder Canyon Project energy over a large population base. The Federal Register Notice lists the prioritization for the allocation of power among the awarded applicants. The City is not a Native American tribe, does not have "Electric Utility Status" nor is it an electric cooperative or public utility for non-profit. Therefore, it appears that the City would be classified in the last priority category, Priority No. 4, Other Eligible Applicants.

The City requests that the proposed Resource Pool Marketing Criteria be revised to include municipal corporations and political subdivisions including irrigation or other districts, municipalities and other governmental organizations without electric utility status. The City is working closely with the Colorado River Commission and NV Energy to make sure the City is ready, willing and able to purchase Federal power from Western.

The City is eager to participate in the power allocation and recommends that Western consider revising the priority allocation. Las Vegas and surrounding communities represent the largest population base within close distance to Hoover Dam, which is an integral part of our community and our history. It is also a vital renewable energy source. The City has invested tens of millions of dollars pursuing its sustainability initiative with a focus on increasing recycling, promoting energy

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Date	Initial	Code
JAN 14 2013		

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conservation and renewable energy, and cutting costs. Accessing Boulder Canyon Project power hits the target for many of the objectives of our sustainability priorities adopted by our Mayor and City Council. The power from Hoover Dam represents a tremendous opportunity to link an iconic, historic treasure with the modern-day needs of major metropolitan area while accelerating momentum for a sustainable future.

The City of Las Vegas thanks Western for this opportunity to voice recommendations and comment on this important project. We look forward to continuing this discussion.

Sincerely,

A handwritten signature in blue ink that reads "Ted J. Olivas". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Ted J. Olivas
Director, Office of Administrative Services