



December 19, 2012

Mr. Darrick Moe
Desert Southwest Regional Manager
Via email: Post2017BCP@wapa.gov
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

Subject: City of Rancho Cucamonga comments to the Boulder Canyon Project – Post 2017 Power Resource Pool

Dear Mr. Moe:

The City of Rancho Cucamonga (City) appreciates the opportunity to provide comments on the marketing criteria to be used to allocate the Post 2017 Boulder Canyon Project (BCP) power resource pool that will become available October 1, 2017.

As one of the newer and smaller municipally owned utilities in California, the City-owned Rancho Cucamonga Municipal Utility (RCMU) began providing electric service to its customer in May of 2004. Annually, RCMU distributes more than 66,000 MWh of electricity to its customers via 20 circuit miles of wire spread across the roughly 4 square miles serviced by RCMU through its 66/12 kV substation. RCMU's peak demand was 17.5 MW, set in August 2011.

As a market participant with the CAISO, the City is an eligible applicant that is ready, willing and able to receive and distribute power from Western per Section C of the October 30, 2012 Federal Register Notice (FRN). The City agrees with Western that in determining Post 2017 BCP allocations for new allottees, it should follow the priority considerations stated under section E of the FRN.

Under section F of the FRN, the City believes that eligible entities in the BCP marketing area that currently do not have a contract with Western for Federal power resources or are not a member of a parent entity that has a contract with Western for Federal power resources should be given first priority over those entities that already have existing Federal power resources. The City believes that this approach would continue to follow Western's tradition of marketing federal power by facilitating the widespread use of its resources and benefiting new entities, such as the City, that did not have the opportunity to receive previous Federal power allocations.

Being a small electric utility, our purchasing power in the energy market is not as great as our larger counterparts; therefore, having a stable long term resource such as Hoover would greatly benefit our electric utility. Thank you again for the opportunity to provide you with our comments. The City looks forward to working with Western during this Post 2017 BCP remarketing effort.

Sincerely,

Fred Lyn
Utilities Division Manager