



January 10, 2013

BRAD ROOS
PRESIDENT

ALLEN THIESSEN
VICE PRESIDENT

VIC SIMMONS
SECRETARY/TREASURER

THOMAS P. GRAVES
EXECUTIVE DIRECTOR

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

Dear Mr. Moe:

On behalf of the Mid-West Electric Consumers Association, I am writing to offer comments on the Western Area Power Administration's ("Western") proposed marketing criteria for the Post 2017 Resource Pool that will become available as a result of the Hoover Allocation Act of 2011 ("HPPA").

The Mid-West Electric Consumers Association was founded in 1958 as the regional coalition of over 300 consumer-owned utilities (rural electric cooperatives, public power districts, and municipal electric utilities) that purchase hydropower generated at federal multi-purpose projects in the Missouri River basin under the Pick-Sloan Missouri Basin Program.

The HPPA provides for a Resource Pool (Schedule D) for "entities not receiving contingent capacity and firm energy under subparagraphs (A) and (B) . . ." Western's proposed marketing criteria do not include that criterion. The marketing criteria must adhere to statutory directives in the allocation of the Post 2017 Resource Pool.

Western proposes a prioritization of preference eligible entities in making new allocations. What is Western's statutory authority for making this prioritization? How did Western determine the ranking among preference-eligible entities as proposed?

Thank you.

Sincerely,

Thomas P. Graves
Executive Director