



PASADENA WATER AND POWER

January 28, 2010

Mr. Derrick Moe
Western Area Power Administration
PO Box 6457
Phoenix, AZ 85005-6457

Faxed to: (602) 605-2490

E-mailed to: Post2017BCP@wapa.gov

Subject: Boulder Canyon Project – Post-2017 Application of the Energy Planning and Management Program Power Marketing Initiative [74 CFR 60256-7]

Dear Mr. Moe:

As a member of the Southern California Public Power Authority (SCPPA) and a current Hoover Contractor, the City of Pasadena supports the written comments filed by SCPPA on January 21, 2010 during the Ontario, California public comment forum.

Since 1931, the City of Pasadena has been an important partner in Hoover Dam, being one of its principal contractors for its energy. Pasadena has a 20 MW allocation at Hoover Dam, which represents approximately 4% of Pasadena's portfolio and its hydroelectricity is an important component to Pasadena's investments in non-fossil fuel energy resources.

The Hoover Power Plant Act of 1984, which currently governs the allocation of power, will expire in 2017 at which time the existing participants will lose their right to power from the Dam. The Pasadena Mayor has written to our Members of Congress in support of the legislation currently before Congress, and we believe it is the best way to resolve the issues and avoid the litigation and animosity that surrounded the previous renewals.

Mr. Derrick Moe - WAPA

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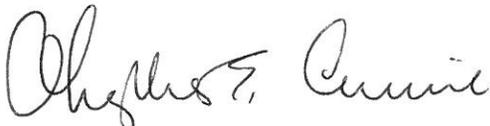
The City of Pasadena joins with the SCPPA Members who are Hoover Contractors in formally requesting that the Western Area Power Administration (WAPA) suspend its current administrative process at least through the end of the current session of Congress, to let the legislative process run its course, and avoid unnecessary duplication of efforts.

To the extent that WAPA's current process continues or resumes, we recommend the inclusion of following provisions from the legislation.

- We support the allocation of the full nameplate capacity of 2074 MW. The Contractors have paid for all the expenses of the project, and should receive the full output when it is available.
- We support the continuation of Schedules A, B, and C. They were the result of a negotiated settlement in the 1980's and should be upheld.
- We support a 50-year term. This matches the term of the original contracts and the Lower Colorado River Multi-Species Conservation Program (LCRMSCP) contracts, and postpones the need to go through this process again.
- We believe the 5% pool for new entrants is appropriate.
- We believe new entrants should be required to become a part of the LCRMSCP and pay a share of the costs.
- We believe provisions should be made to allow Contractors to deliver their power through transactions with an Independent System Operator or similar organization.

Thank you for the opportunity to submit these comments and we hope you will consider this important request.

Respectfully submitted,



Phyllis E. Currie
General Manager