UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
WESTERN AREA POWER ADMINISTRATION

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

Public Comment Forum, January 21, 2010
Ontario, California

WRITTEN COMMENTS OF THE SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY ON BEHALF OF AZUSA, BANNING, COLTON, GLENDALE, BURBANK, PASADENA, ANAHEIM, RIVERSIDE AND VERNON

Submitted by:
Steven L. Homer
Project Administrator
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Ten members of the Southern California Public Power Authority (SCPPA) are current Hoover Contractors. Four of them were original Schedule A Contractors, which means that they were part of the visionary group who agreed to pay for the construction of the dam and power plant, and agreed to take all the power in the early years when it was more expensive than other sources. The other six agreed to fund the Uprating in the 1980's.

All ten are fully in support of the legislation currently before Congress, and believe it is the best way to resolve the issues and avoid the litigation and animosity that surrounded the previous renewals.

The SCPPA Members who are Hoover Contractors request that Western suspend the 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 Western'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 respected.

- We support a 50-year term. This matches the term of the original contracts and the 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 provision should be made to allow Contractors to deliver their power through transactions with an Independent System Operator or similar organization.

We thank Western for the opportunity to submit these comments.

Respectfully submitted,

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Southern California Public Power Authority