

MOYES SELLERS & SIMS

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October 21, 2010

Sent via e-mail

Mr. Darrick Moe
Regional Manager
Western Area Power Administration
Desert Southwest Region
P. O. Box 6457
Phoenix, AZ 85005-6457
moe@wapa.gov; dswpwrmrk@wapa.gov

Re: ED5-Palo Verde Hub Project

Dear Mr. Moe:

I am writing on behalf of the following clients:

Aguila Irrigation District
City of Safford
Electrical District Number Eight
Harquahala Valley Power District
McMullen Valley Water Conservation and Drainage District
Tonopah Irrigation District

We are submitting this comment letter in response to the request by Western Area Power Administration (“Western”) for comments issued at Western’s October 6, 2010, Parker-Davis Project customer meeting, and in conjunction with comments previously submitted by the Southwest Public Power Resources (“SPPR”) Group. We support implementation of the proposed ED5-Palo Verde Hub Project, also known as the SPPR Group Proposal, including Western’s proposal to add a facility use charge to the Parker-Davis base rate as a payment mechanism. We are confident that the concerns voiced earlier regarding these proposals have been satisfactorily addressed by Western’s responses and modifications, such that these proposals will provide multiple benefits to both existing and potential customers.

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We thank you and your staff for your efforts, and look forward to working further with Western on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay I. Moyes". The signature is fluid and cursive, with the first name "Jay" being particularly prominent.

Jay I. Moyes

JIM/lkk

cc:

Aguila Irrigation District

City of Safford

Electrical District Number Eight

Harquahala Valley Power District

McMullen Valley Water Conservation and Drainage District

Tonopah Irrigation District

K.R. Saline & Assoc.