

ANZA ELECTRIC COOPERATIVE, Inc.

A Touchstone Energy® Cooperative 

Phone: (951) 763-4333

P.O. Box 391909 (58470 Highway 371) Anza, California 92539-1909

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Mr. Ronald E. Moulton
Acting Regional Manager
Desert Southwest Customer Service Region
Western Area Power Administration
P.O. Box 6457
Phoenix, Arizona 85005-6457

RE: Proposed Boulder Canyon Project – Post 2017 Resource Pool

Dear Mr. Moulton:

On behalf of Anza Electric Cooperative, Inc. (“Anza”) I am responding to the Federal Register Notice of August 8, 2014 announcing the proposed Boulder Canyon Project Allocations for power made available under Schedule D of the Hoover Power Allocation Act (“HPAA”). As the general manager of Anza, one of the entities selected in the August 8 Federal Register notice, I appreciate the opportunity to share the comments below.

At the outset, the allocations proposed by the Western Area Power Administration (“Western”) are consistent with the HPAA and the marketing criteria released on December 30, 2013. As a private corporation, Anza Electric Cooperative, Inc. meets the eligibility as set forth in Section 5 of the Boulder Canyon Project Act. This conclusion set forth in the final marketing criteria should not be subject to further inquiry or investigation.

Western should also refrain from revisiting the criteria that provided the basis for the allocations in California. During the Public Information Forum, Western explained that the application of the 3 MW cap along with the cap on the amount of federal resource guided the allocation process. These criteria which were finalized in the final marketing criteria do not merit further revision either. We encourage Western to preserve the underlying marketing criteria that supported the proposed allocations.

Anza also recognizes that Western has indicated that it will be developing operational protocols to facilitate the delivery of the power made available under Schedule D. Anza encourages Western to develop the operational protocols as soon as possible to facilitate planning of necessary transmission arrangements.

Finally, in substantiating the load data Anza asks Western to use proven data sources such as Balancing Authority metered data, metered data from a Generation and Transmission provider, and Transmission Provider metered data. This may be also supported by form seven

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required by the Rural Utilities Service ("RUS"). Although we understand that these sources of information will be sufficient, I ask Western to let us know if any data source is inadequate or incomplete prior to October 3, 2014. Furthermore, if any inconsistencies arise after our submissions on October 3, 2014 we would ask for the opportunity to correct any submissions so that the load data that Western will use will be completely accurate.¹

We thank you for your consideration of our comments.

Sincerely,



Kevin Short
General Manager

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¹ This may arise once Western recalculates peak load data after adding back in loads that were subtracted from applicants who were not selected for an allocation.