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October 5, 2011

Ms. Debbie Emler
Asst. Regional Manager For Federal Power Programs
Western Area Power Administration
P O Box 6457
Phoenix, AZ 85005-6457

Re: Comments on Western's Proposed Cost Allocation Methodology and Consolidation

Dear Ms. Emler:

The Town of Marana Utilities Department is a customer of the Parker-Davis allocation and we receive electricity over the Parker-Davis system interconnected to other systems. We have reviewed Western's proposed cost allocation methodology. Particularly, we have reviewed the benefits of the more equitable WAPA proposed methodology that no longer is based on SCADA points but instead uses other factors to create a more equitable allocation of costs.

An equitable allocation of cost is very important for our business model and we are supportive of your proposal.

Sincerely,

Ann Meaders
Interim Utilities Director