



ALAMEDA
POWER & TELECOM

A Department of the City of Alameda

July 7, 2008

Ms. Sonja A. Anderson
Power Marketing Manager, Sierra Nevada Region
Western Area Power Administration
114 Parkshore Drive
Folsom, CA 95630-4710
sanderso@wapa.gov

Dear Ms. Anderson:

Comments of Alameda Power & Telecom Re: Western's
Notice of Proposed 2015 Resource Pool Size and Revised Eligibility Criteria
Published May 5, 2008, at 73 FR 24592

Alameda Power & Telecom (Alameda P&T) has provided electric service to Alameda residents and businesses since 1887. Almost 100 years later, Alameda P&T received a small allocation of Central Valley Project power. Since 2005, Alameda P&T has had an allocation of 1.08075% of Western Base Resource. In an average hydro year, Alameda's Western Base Resource allocation provides Alameda P&T with approximately 36,600 MWh, or 9% of the energy we needed to serve our customers. Alameda P&T has been active in acquiring resources over the last 30 years through joint action with others, with an emphasis on renewable resources, but these resources are relatively expensive.

We appreciate and support the efforts of Western "to provide for a 2015 Resource Pool sufficient to promote widespread use of Federal power." We believe it is in keeping with Western's mission to spread its resources to those preference utilities that have not received a large portion of their power from Western in the past.

In the years leading up to 2004, Western, with the active involvement of its customers and prospective customers developed an extensive Power Marketing Plan that successfully balanced many competing interests. Western is now proposing to eliminate the criteria of providing power to customers with relatively small allocations, without any apparent replacement criteria. While we agree that the previous criteria were too restrictive, or even arbitrary, we believe that some relative size criteria should be incorporated – such as 15-to-20 percent of load.

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Alameda P&T recommends that Western retain a modified criterion for the allocation of the resource pool that continues the recognition of relative size of Western allocations compared to the customers' load. This criterion would help promote widespread use of Federal power, helps level the playing field, and assists preference utilities with other high cost resources.

If you have any questions on these comments, please contact Don Rushton at Alameda Power & Telecom, 2000 Grand Street, Alameda, CA 94501, drushton@alamedapt.com, or 510-748-3946. Thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Girish', with a long horizontal stroke extending to the right.

Girish Balachandran
General Manager

cc: Don Rushton, Nannette Engelbrite, Jerry Toenyas