



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT
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July 2, 2008

ET&C 08-056

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

RE: Comments on Western's Proposed Revisions to the 2015 Resource Pool Eligibility Criteria

Dear Sonja:

This letter provides the Sacramento Municipal Utility District's (SMUD's) comments on Western's proposed changes to the 2015 Resource Pool Eligibility Criteria as defined in the notice that Western posted in the Federal Register Notice (73 Fed. Reg. 24592-24594), dated May 5, 2008.

SMUD supports Western decision to delete the following item from the 2004 Power Marketing Plan, as shown in Section IV, B, 2, g of the Federal Register Notice (64 Fed. Reg. 34417), dated June 25, 1999:

g. Existing customers may apply for a resource pool allocation if their extension CRD, set forth in Appendix A, is not more than 15 percent of their peak load in the calendar year prior to the Call for Applications, and not more than 10 MW.

SMUD believes that the current eligibility criterion is too restrictive and deleting this criteria will have the effect of allowing a greater number of Western customers to apply for a portion of the 2015 Resource Pool, including SMUD. Given the pending SMUD reductions in Base Resource percentage allocation it seems equitable that SMUD will have an opportunity to apply for a share of the 2015 Resource Pool, when Western makes it available.

Thank you for the opportunity to comment.

Sincerely,

Steven K. Sorey
Manager, Energy Trading and Contracts

cc. Jeanne Haas - Western