

From: "Lambeck, Jon C" <jlambeck@mwdh2o.com>
To: "finalprinciples@wapa.gov" <finalprinciples@wapa.gov>
CC: "Finley, Ann T" <afinley@mwdh2o.com>
Date: 7/29/2011 6:10 PM
Subject: Western's Proposed Revisions to the Final Principles of Integrated Resource Planning

Ms. Julia L. Kyriss
Colorado River Storage Project (CRSP) Manager
CRSP Management Center
150 East Social Hall Avenue, Suite 300
Salt Lake City, Utah 84111-1580
Email: finalprinciples@wapa.gov<mailto:finalprinciples@wapa.gov>

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the Western Area Power Administration's (Western's) Revision to the Final Principles of Integrated Resource Planning for Use in Resource Acquisition and Transmission Planning (FRN Vol. 76, Number 125, June 29, 2011).

Metropolitan supports elimination of the transmission planning principles and agrees there are several regional and subregional planning groups or efforts for stakeholder involvement. Metropolitan requests clarification that Western Desert Southwest office will continue to hold the annual Ten Year Capital Program customer meetings, however, it is our understanding the Joint Planning Agreement meetings have already been discontinued.

With respect to the changes proposed by Western for long term resource acquisition principles, Metropolitan does not support moving ahead with the revisions at this time.

We are aware of comments and questions that have been raised by other Parties, including the Colorado River Energy Distributors Association and the Colorado River Commission of Nevada. In addition, Metropolitan is concerned how the proposed principles would work specifically with the existing Boulder Canyon Project (BCP) contract provisions which already allow the federal government to acquire short term supplemental resources and pass through those costs to the requesting contractor. Similarly, Metropolitan would be interested in how Western's proposed Resource Acquisition costs would be charged to the Parker Power Plant.

Given the many uncertainties and questions as to the implications of the proposed Resource Acquisition principle changes, Metropolitan requests Western withdraw or delay implementing the proposed changes until the expressed concerns have been addressed.

Please contact me at 213-217-7381 or Ann Finley at 213-217-7136 if you have any questions.

Sincerely,

Jon Lambeck
Manager, Power Resources
Metropolitan Water District of Southern California

This communication, together with any attachments or embedded links, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the

intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of the communication, along with any attachments or embedded links, from your system.