

# Arizona Westside Irrigation & Electrical Districts

Aguila Irrigation District  
Buckeye Water Conservation & Drainage District  
Electrical District Number Six  
Electrical District Number Seven  
Electrical District Number Eight  
Harquahala Valley Power District  
Ocotillo Water Conservation District #68



Maricopa County Municipal Water Conservation District #1  
McMullen Valley Water Conservation & Drainage District  
Roosevelt Irrigation District  
Tonopah Irrigation District  
Wellton-Mohawk Irrigation and Drainage District

April 16, 2012

VIA U.S. Mail and Email to [moe@wapa.gov](mailto:moe@wapa.gov)

Darrick Moe, Regional Manager,  
Desert Southwest Customer Service Region  
Western Area Power Administration  
P.O. Box 6457  
Phoenix, AZ 85005-6457

Re: Boulder Canyon Project FY 2013 Rates Public Comment

Dear Mr. Moe:

This letter constitutes public comment on behalf of the Arizona Westside Irrigation & Electrical Districts regarding the proposed FY 2013 rates for power from the Boulder Canyon Project (Hoover).

Reference is made to the oral comments by Robert S. Lynch at the Public Comment Forum held at Western's DSW office on April 11, 2012. We wish to adopt and reiterate all of Mr. Lynch's comments. In particular, we emphasize that we strongly oppose any expenditure of any revenues collected through the proposed Hoover rates in FY 2013 for the study, design, implementation or operation of, or Western's participation in, an Energy Imbalance Market (EIM). Western's statutory authorities and obligations with respect to Hoover power, most recently affirmed by Congress, do not allow for this resource to be made available by Western to an EIM; and Western should not allocate to the Boulder Canyon Project any costs it is incurring for exploration of participation by Western in an EIM.

We appreciate Western's efforts toward the modest overall rate decrease reflected by the proposed FY 2013 Hoover rates. Continuing fiscal diligence, and insulation of Hoover from

The Arizona Westside Irrigation & Electrical Districts are an informal coalition of contractors of federal hydropower used to support irrigated agriculture in western Arizona.

1850 North Central Avenue, Suite 1100, Phoenix, Arizona 85004  
Phone (602) 604-2156 FAX (602) 274-9135

initiatives of questionable economic merit for Western's customers, such as an EIM, will help keep Hoover affordable for our districts.

Thank you for the opportunity to comment. We will appreciate receiving a specific response to the above and to Mr. Lynch's other comments in connection with the final order in this proceeding.

Very truly yours,



Jay I. Moyes, for  
Arizona Westside Irrigation & Electrical Districts

JIM/lkk

cc: Westside District Managers  
Sheryl Sweeney, Esq.  
K. R. Saline & Associates  
Deborah Sliz

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**IRRIGATION & ELECTRICAL DISTRICTS  
ASSOCIATION OF ARIZONA**

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VICE-PRESIDENT

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WILLIAM H. STACY  
SECRETARY-TREASURER

ROBERT S. LYNCH  
COUNSEL AND  
ASSISTANT SECRETARY-TREASURER

E-MAILED ONLY

April 17, 2012

Mr. Darrick Moe, Regional Manager  
Desert Southwest Customer Service Region  
Western Area Power Administration  
615 South 43<sup>rd</sup> Avenue  
Phoenix, Arizona 85009

Re: Boulder Canyon Project FY 2013 Proposed Rates

Dear Darrick:

Following up on my oral testimony at the Public Comment Forum last week, I wish to reiterate that we have no substantive comments on the actual rate analysis proposed for FY 2013. We are concerned that extraneous costs emanating from Secretary Chu's March 16, 2012 memorandum concerning new roles for PMAs will creep into the Hoover rates. That should not happen.

The Boulder Canyon Project Act, as amended, makes it clear that Hoover energy belongs to the Hoover contractors. If that were already not the case, the new Hoover allocation legislation signed last year makes it abundantly clear that the entire resource is to be allocated so that when full capacity and firm energy are available, that resource continue to be available to the contractors. Surplus energy is also allocated (Hoover C). Thus, in our view, there is nothing left to sell into an Energy Imbalance Market (EIM) and no reason why the Boulder Canyon Project should suffer additional costs because Western has been directed to examine its possible participation in an EIM.

Thank you for the opportunity to comment on this important resource and this significant rate analysis.

Sincerely,

/s/

Robert S. Lynch  
Counsel and Assistant Secretary/Treasurer

RSL:psr  
cc: IEDA Members

*SERVING ARIZONA SINCE 1962*

*Sheryl A. Sweeney*  
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April 16, 2012

**VIA U.S. Mail and Email to [moe@wapa.gov](mailto:moe@wapa.gov)**

Darrick Moe, Regional Manager  
Desert Southwest Customer Service  
Region, Western Area Power  
Administration, P.O. Box 6457,  
Phoenix, AZ 85005-6457

**Re: Boulder Canyon Project FY 2012 Rates Public Comment**

Dear Mr. Moe:

This letter constitutes public comment on behalf of Roosevelt Irrigation District, Buckeye Water Conservation and Drainage District, Maricopa County Municipal Water Conservation District Number One, Electrical District Number Seven, Ocotillo Water Conservation District, and Electrical District Number Six regarding the proposed FY 2013 rates for power from the Boulder Canyon Project (Hoover).

Reference is made to the oral comments by Robert S. Lynch at the Public Comment Forum held at Westerns DSW office on April 11, 2012. We wish to adopt and reiterate all of Mr. Lynch's comments. In particular, we emphasize that we strongly oppose any expenditure of any revenues collected through the proposed Hoover rates in FY 2013 for the study, design, implementation or operation of, or Western's participation in, an Energy Imbalance Market (EIM). Western's statutory authorities and obligations with respect to Hoover power, most recently affirmed by Congress, do not allow for this resource to be made available by Western to an EIM; and Western should not allocate to the Boulder Canyon Project any costs it is incurring for exploration of participation by Western in an EIM.

We appreciate Western's efforts toward the modest overall rate decrease reflected by the proposed FY 2013 Hoover rates. Continuing fiscal diligence, and insulation of Hoover from initiatives of questionable economic merit for Western's customers, such as an EIM, will help keep Hoover affordable.

Thank you for the opportunity to comment.

Very truly yours,

  
Sheryl A. Sweeney

Darrick Moe, Regional Manager  
April 16, 2012  
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c:     Donovan Neese (RID)  
       Ed Garek (BWCDD)  
       Jim Sweeney (MWD)  
       R. D. Justice (ED7)  
       Jeff Woner (OWCD)  
       Jim Wales (ED6)  
       Bill Van Allen (ED6)  
       Bob Lynch