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Via E-Mail: Post2017BCP@wapa.gov

September 1, 2011

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

Dear Mr. Moe:

Re: Comments of Imperial Irrigation District to the Boulder Canyon Project –
Post-2017 Application of the Energy Planning and Management
Program Power Marketing Initiative

The Imperial Irrigation District appreciates the opportunity to submit the following comments to Western Area Power Administration's (Western) Notice of Action and Notice of Proposal published in the Federal Register of April 27, 2011.

IID is an irrigation district organized and existing under the California Water Code. IID serves approximately 146,000 retail customers in Imperial and Riverside Counties in California with a peak load of approximately 1,000 MW. To serve its retail load, IID both generates and purchases energy. It is also a balancing authority that owns and operates approximately 1,400 miles of transmission lines. IID's system has interconnections with Southern California Edison, San Diego Gas & Electric, Arizona Public Service and Western.

IID generally supports Western's proposal to apply the Energy Planning and Management Program (EPAMP) Power Marketing Initiative (PMI) to the remarketing of Boulder Canyon Project (BCP) energy. IID supports the proposal to market 2,044 MW of contingent capacity with an associated 4,527,000 MWh of firm energy from BCP. IID does not object to Western's proposal to extend the existing contractors' contingent capacity allocations. IID also supports the proposed 30-year contract term. It also supports the proposal to create a resource pool and make that available to new contractors. IID submits, however, that a 5 percent resource pool may be inadequate. IID urges Western to reconsider whether the resource pool should be larger than the proposed 93 MW of contingent capacity with 226,350 MWh of associated annual firm energy.

IID intends to be an applicant for an allocation from the resource pool that is created by this remarketing effort. Access to BCP energy will provide IID with a reasonably-priced source of energy to serve load. IID is an ideal candidate to receive an allocation from BCP. IID's service territory lies within the BCP marketing area. Imperial County suffers from widespread poverty and chronically high unemployment. The unemployment rate in July 2011 was 30.8 percent, more than 10 percent higher than any other region of California. Nearly 23 percent of the population lives beneath the poverty level.

IID is the largest public power entity in Southern California that does not currently receive an allocation of BCP power and the only member of the Southern California Public Power Authority that is not a BCP contractor. BCP power will provide IID with low-cost energy to serve load. It will also assist IID in meeting its renewable portfolio standard and greenhouse gas requirements.

For all of the reasons set forth above, IID intends to seek an allocation of BCP energy during this remarketing effort.

Sincerely,



Kevin E. Kelley
General Manager

cc: Stephen J. Keene, Associate Counsel
Joel K. Ivy, Interim Assistant General Manager, Energy
Raquel Lopez, Superintendent, Strategic Business Development