



Page Electric Utility

electric power service for the people . . . by the people



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January 26, 2010

Mr. Darrick Moe
Desert Southwest Regional Manager
Western Area Power Administration
Post Office Box 6457
Phoenix, Arizona 85005-6457

and

Via Facsimile: 602-605-2490

and

Via Email: post2017bcp@wapa.gov

Re: Comments on the Boulder Canyon Project Post – 2017 Application of the
Energy Planning and Management Program Power Marketing Initiative

Dear Mr. Moe:

Page Electric Utility, a Municipal Electric Utility serving both within and without its corporate boundaries, is organized under the laws of the State of Arizona and recognized as a Federal Preference Customer. Our peak load to date is 26+MW and projected load growth to be 31+MW peak by 2017. Page anticipates serving an additional 20MW of pumping load for the Lake Powell Pipeline starting in the year 2020.

The following are comments concerning the Boulder Canyon Project Post 2017 Power Marketing Initiative:

It is Page's understanding that most Western Resource Pools exist at percentages between six (6) and eight (8) percent. Therefore we believe that the Resource Pool for Hoover should follow this model and be established at closer to 8% rather than the proposed 5%.

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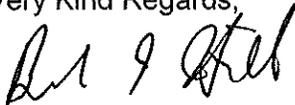
Page believes the Arizona Power Authority has done an excellent job over the years, and is staffed with competent and thoughtful professionals. Page understands that for 70 years the Arizona Power Authority has been forced to operate under a law that discriminates with its allocations of Hoover in Arizona. We ask that Western enforce a halt to this practice that discriminates in the sale of a Federal Resource against electric distribution cooperatives, cities and towns like Page, AZ and tribes. It is Page's belief that all allocations to the Arizona Power Authority should be conditioned by a contractual requirement that in the resale of its Hoover allocation the Arizona Power Authority comply with Federal Preference Laws. The allocation of the Federal Resource to Arizona should no longer mandate APA resale of the power and energy from Hoover under these discriminatory statutes. The statutes governing the Arizona Power Authority require it to discriminate in the sale of Hoover power and energy as they contain priorities in APA allocations to preference power entities contrary to Federal law which deny equal and equitable allocations to Arizona Native American tribal entities, cities and towns, tribal utilities, and distribution electric cooperatives. I am sure you agree with Page that fair and equitable treatment should be everyone's goal with Federal Hydropower.

Further, allocations to Arizona should require that upon re-sale, new customer allocations within Arizona should have equal and equitable access to the same capacity factors and schedule A, B, and C energy as existing Arizona allottees.

Page AZ is within the Hoover Marketing Area, and looks forward to the fair and equitable allocation process of Hoover.

If you would like to discuss further, please do not hesitate to contact me.

Very Kind Regards,



Bryan Hill PE
General Manager

cc: M. Curtis - AMPUA
cc: Page Electric Utility Board
cc: Page City Attorney