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E-MAILED ONLY
(Post2017BCP@wapa.gov)

September 30, 2010

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

Re: Comment deadline on the Post-2017 EPAMP Application to the Boulder Canyon Project, 75
Fed.Reg. 19966 (April 16, 2010)

Dear Darrick:

In the above Federal Register notice, the Western Area Power Administration (Western) extended the comment deadline for this public comment process to September 30, 2010. Western had kicked off this process with a Federal Register notice in November and Public Information Forums in California, Nevada and Arizona.

We thought at the time that extending the comment deadline was a reasonable way to handle this nascent administrative process that essentially would mimic legislation that had been proposed in Congress. Better to wait to see if Congress acted rather than expend resources on this process only to find out that Congress had given you different directions.

We had hoped that Western would further extend the comment deadline as a way of keeping the administrative process on hold, given the fact that Congress indeed was moving legislation on this subject. Since you have decided to close the comment period, we felt it incumbent to supplement our prior comments to again suggest that the administrative process be kept on hold.

As you know, H.R. 4349 has passed the House of Representatives and has been voted out favorably by the Senate Energy and Natural Resources Committee. The Committee report has been prepared and the bill has been given a calendar assignment in the Senate.

It is our understanding that the Chairman of the Senate Committee is considering combining the Hoover bill with other matters for a floor vote during the lame duck session.

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As you are well aware, Congress adjourned yesterday until after the election and is scheduled to come back in a lame duck session starting on November 15, 2010. We are confident that the bill will be scheduled for and get a favorable vote in the Senate at that time and go to the President. That being the case, we believe the same principles of administrative economy should lead you to the conclusion that postponing further work on the administrative process is the correct course of action at this time. We hope you will agree.

Thank you for the opportunity to file these supplemental comments. We look forward to working with Western on this important process.

Sincerely,

/s/

Robert S. Lynch
Counsel and Assistant Secretary/Treasurer

RSL:psr

cc: Senator Jon Kyl
Senator John McCain
Tim Meeks, Administrator, Western
Joe Mulholland, Executive Director, Arizona Power Authority
IEDA Members