



# TRICO

Electric Cooperative, Inc.

A Touchstone Energy® Cooperative



January 29, 2010

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

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

Dear Mr. Moe:

Trico Electric Cooperative, Inc. is a distribution electric Cooperative organized under the laws of the State of Arizona. Our entity serves approximately 34,491 customers and 38,811 meters and our projected load is approximately 203 MW as of 2017. The following are the comments concerning the Boulder Canyon Project Post 2017 Power Marketing Initiative.

**Resource Pool:** We believe the Resource Pool is too small. Most Western Resource Pool percentages have previously been established between six and eight percent and we believe that the Resource Pool should be established at 8%.

**Renewable Energy Resource Requirement:** We believe the Hoover resource supports implementation of renewable energy projects, and consequently, it is important that the resource pool be large enough to make allocations of the Hoover resource to new customers.

For a period of 70 years the Arizona Power Authority has operated under a law that effectively excludes electric distributive cooperatives, tribal authorities, cities and towns from the allocation of Hoover in Arizona. Future allocations to the Arizona Power Authority should require the Arizona Power Authority to resell the allocation in a manner consistent with Federal Preference Laws.

**Term:** A 50 year term is preferable.

**Capacity Factor:** 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.

Sincerely,

Vincent Nitido  
CEO/General Manager

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c: Congressional Delegation