



Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457
SEP - 2 2004

Dear AC Intertie, Parker-Davis, Central Arizona Project Customers and Interested Parties:

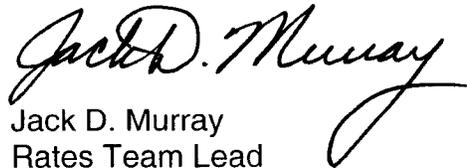
The Public Information Forum was held on July 14, 2004 for the DSW Multi-System Transmission Rate public process. The Public Comment Forum was held on August 11, 2004. Copies of the transcripts are available upon payment of the required fee to the court reporter. They are also available for review at Western's Phoenix office or Western's headquarters office in Lakewood, Colorado.

During the forums, a number of customers had comments on the material presented and Western replied to most of these comments during the proceedings. For several comments, Western either responded that a reply would be researched or felt additional explanation was needed. The attached sheet documents these comments with appropriate responses.

This letter, along with attached comments and responses is also available on Western's web site at www.wapa.gov/dsw/pwrmkt/MSTRP/MSTRP.htm

If you have any questions regarding the enclosed information feel free to call me at 602-352-2442 or Bill Snowden at 602-352-2766.

Sincerely,


Jack D. Murray
Rates Team Lead

Enclosures

cc:

Mr. Ronald Smith
U.S. Department of Interior
Bureau of Reclamation
Lower Colorado Region
Post Office Box 61470
Boulder City, NV 89006-14702

**MULTI-SYSTEM TRANSMISSION RATE
RESPONSES TO COMMENTS
RECEIVED ON OR BEFORE AUGUST 11, 2004**

Comment: A customer stated that they have yet to hear any compelling reasons for adoption of the Multi-System Transmission Rate (MSTR) or have yet to hear how the majority of Western's Customers would benefit from a MSTR.

Response: Western has conducted five informal customer meetings since April 2003 to explain the purpose for evaluation and possible adoption of a MSTR. The motivation behind Western's efforts stem from customer requests to explore a common transmission rate. One benefit of implementing a MSTR is that 78MW of additional transmission capacity will be made available for sale which will result in additional revenue. Western has also discussed during the informal meetings that the additional capacity and system flexibility will partially mitigate the need to reduce existing transmission customers' reservations when those contracts are converted to Open Access Transmission Tariff (OATT) agreements. The customers are aware that the Desert Southwest (DSW) transmission systems are operated as an integrated Federal system and the MSTR allows Western to match pricing of its products with the operational realities of an integrated system. The customers will realize greater access to DSW's transmission system without pancaked rates. Under the proposed model to implement the MSTR, approximately 58% of DSW's customers either realize a cost benefit due to elimination of pancaked rates or experience no cost impact by transitioning to a MSTR. Total savings among all customers upon implementation of the MSTR in FY 2009 is approximately \$3.5 million.

Comment: A customer stated their transmission service on the AC Intertie 230/345kV would be impacted by approximately \$300,000 per year in increased costs. They feel the impact is an unfair and inequitable subsidy by one project to another project.

Response: The MSTR is not a cross subsidy from one project to another. As explained in various meetings, the projects will remain financially segregated. All expenses will continue to be booked and accounted for by individual project as is the current practice. Revenue will continue to be accounted for based on the power system in which it is earned. There will be no transfer of revenues between power systems simply because a MSTR is

implemented. Western will continue to have separate Power Repayment Studies (PRS) for each power system and will separately calculate each system's revenue requirement and reservation data.

Comment: A customer requested Western to identify the number of transmission customers whose cost shift is minimized under the alternative proposal of the OATT 1st concept and also requested the number of customers whose costs are increased under the MSTR convergence model.

Response: In the Public Information Forum held on July 14, 2004 a customer asked, in reference to the "OATT 1st" method of calculating the MSTR, what was meant by the term "some customers". In Western's presentation we discussed the fact that under the OATT 1st methodology, some customers received the benefit of choosing to go to a MSTR or remain on a single system rate. The customer wanted clarification on what was meant by the term "some" customers. In the public comment forum on August 11, 2004, this request was modified to include a cost impact analysis of the implementation of the proposed MSTR with convergence in the fifth year. An earlier analysis showing impacts by customer was presented in the informal meeting of 5/23/03 and is on Western's website at www.wapa.gov/dsw/pwrnkt. An updated analysis with current data is now also available on the website. This analysis also showed which customers benefit from implementation of a MSTR.

In reference to the OATT 1st methodology, Western presented this as a "customer choice" model to calculate the MSTR. Under this plan, existing firm transmission service customers would be able to remain at the single system rate until the expiration date of their existing firm transmission contracts. Upon expiration of the firm transmission contract, it would be converted to an OATT agreement under the MSTR then in effect. As discussed in the informal meeting of October, 2003 contracts with reservations totaling approximately 25% of the total system reservations would expire within the rate evaluation period (FY2005-FY2009) and be required to move to the MSTR. For those customers with contracts expiring beginning in FY 2005, the rate under OATT 1st was significantly higher than under the proposed method or any of the other methods. Western estimated and discussed during the October, 2003 meeting that it would be in excess of ten years before the MSTR under OATT 1st would come close to the highest rates currently charged on DSW transmission systems. Prior to the tenth year, the MSTR would remain significantly higher than under any other proposed methods. From an economic standpoint, only those customers with existing long term contracts (expiration

beyond 2014) have a real choice whether to go to MSTR in the short term. Likewise, only those same customers see any mitigation from immediate negative economic impacts of the OATT 1st model.

Under the convergence model proposed, we have stated that cost increases are mitigated, to the extent possible, by going to the full MSTR over a five year period. It has not been presented as a model that eliminates cost increases for all of our customers, but one that softens any increases as much as possible while offering the added benefit of greater access to DSW's transmission system without pancaked rates. Under the proposed model, approximately 58% of DSW's customers either realize a cost benefit due to the elimination of pancaked rates or see no cost impact at all by transitioning to a MSTR. The attached table shows the cost impacts, by customer of the effects of the MSTR by comparing existing rates to the proposed rates. This information is also available on Western's website at www.wapa.gov/dsw/pwrmkt.

It is clear Western cannot transition to a MSTR without a certain number of customers being faced with cost increases. Western's efforts throughout the process have been to explore methods to ease the impact of the increases to those customers, while eliminating pancaked rates and increasing access to the system for all customers that wish to take advantage of such access.

Comment: A commenter expressed his concern that Central Arizona Water Conservation District (CAWCD) would be at risk of increased costs if the multi-system revenue requirement was not recovered in a particular year. This risk is caused by no provision for Central Arizona Project (CAP) to take a deficit loan as allowed in the other two projects. The commenter is asking Western to find a way to shield CAP from the impact of deficits resulting from the MSTR accounting process. If CAP cannot be shielded from the deficits of other projects, then remove CAP from the MSTR process.

Response: Implementation of a MSTR rate does not result in cross subsidy among the individual transmission projects. Under the MSTR accounting process, each project is accounted for separately and maintains a separate power repayment study. As a result, the deficits of one project do not get spread to the other projects.

CAWCD, as a firm transmission customer on the Parker-Davis Project (P-DP) and Intertie Systems will see decreased costs as a result of the elimination of rate pancaking. Inclusion of the CAP transmission system in the MSTR calculation does not, in any way, put CAWCD at risk of increased costs for its use of the CAP system

to serve project pumping loads. CAWCD does not pay a firm transmission rate to Western for its use of the CAP transmission system. As a project use customer, CAWCD's use of the CAP transmission system to serve pumping loads is considered priority use load and the cost for such use is included in CAWCD's repayment obligation to the Bureau of Reclamation. The rates calculated and designed by Western for CAP transmission service is only for the transmission capacity in excess of CAP pumping load requirements. As discussed in the informal meetings and again at the public information forum, CAWCD's use of the CAP transmission system is not included in the total available CAP transmission component of the MSTR calculation. Since CAWCD is removed from the calculation and does not pay a firm transmission rate for use of the CAP transmission system, only those customers that do use the excess capacity are subject to rate changes in the MSTR.

In addition to the above, the MSTR would create no additional risk to CAWCD of increased costs in the event of a deficit on another project. As mentioned previously, CAWCD has a contract for firm transmission service on the Parker Davis and Intertie transmission systems. In the event one of those systems incurs an operating deficit, CAWCD could, like all customers, face increased rates stemming from the need for additional revenue on those projects. Since CAWCD does not pay a transmission rate for its use of the CAP transmission system, inclusion of the CAP in the MSTR has no effect on this risk to CAWCD. CAWCD is shielded from risk of increased costs resulting from inclusion of CAP in the MSTR

Comment: A Customer expressed that their 40-year contract with Western over two systems would now include a third system and therefore opposes Western's proposal to implement a MSTR. The customer also stated a comment letter was sent to Western in early July that was not posted to Western's website and requested this be accomplished.

Response: The execution of long term transmission contracts does not pre-determine the outcome of Western's public rate processes or preclude Western from implementing changes in its rate methodologies. The contracts give the customers access to the transmission system at specific points of receipt and points of delivery as defined in the contract. The contracts also state that the rates or rate methodology used to determine total charges may be modified and superseded in the future.

In regard to the letter from the customer, DSW checked mailroom records beginning 7/1/04 and found no record indicating receipt of the letter. The letter was re-sent and received by DSW on August 16, 2004. It has since been posted to Western's website.

Comment: A customer commented that Arizona Power Authority's transmission reservation in the last year of the transition period is not enough for their Hoover allocation. The customer noted that their allocation from Hoover is 377 MW and their unpancaked reservation was shown as 229 MW.

Response: In the handouts at the public information forum, Arizona Power Authority's FY 2009 multi-system reservation was incorrectly listed as 229,579 kW. The correct reservation should have been 365,690 kW.

Multi-system reservations are calculated by using the reservation data from the current Exhibit A and eliminating the pancaked portion. In FY 2009, under the MSTR, their reservation will have an Intertie Point of Receipt of 188,000 kW, with deliveries of 182,360 kW ($188,000 * 97\%$). Parker-Davis Points of Receipt will be 189,000 kW and 50,145 kW (from Intertie), with deliveries of 233,475 kW ($189,000 * 97\% + 50,145$). The multi-system reservation is $182,360 \text{ kW} + 233,475 \text{ kW} - 50,145 \text{ kW} = 365,690 \text{ kW}$.

Comment: A customer asked if the P-DP transmission rate were to go up to \$1.11 kW-Mo, which was projected in previous informal meetings, and is now going to be kept at \$1.08 kW-Mo, would that change the MSTR? If more is being paid under the P-DP transmission rate by Firm Electric Service (FES) customers, then does the MSTR decrease?

Response: If the P-DP Firm Transmission Rate increased to \$1.11 kW-Mo starting in FY 2005, the target MSTR would be \$1.16 kW-Mo. When the P-DP FES customers pay more for the transmission component, the target MSTR will usually increase because the P-DP MSTR revenue requirement contribution is higher.

The P-DP MSTR revenue requirement contribution is equal to the P-DP annual revenue requirement allocated to transmission less what the P-DP FES customers pay for the transmission component. The P-DP FES customers pay their proportionate share of the P-DP annual revenue requirement allocated to transmission. Their proportionate share is determined by the ratio of FES delivery commitments to the total P-DP transmission delivery commitments. Therefore, the P-DP FES customers would pay more for the transmission component only when the P-DP annual revenue

requirement allocated to transmission increases. When the P-DP annual revenue requirement allocated to transmission increases, then the P-DP MSTR revenue requirement contribution will increase which applies upward pressure on the target MSTR.

Comment: A customer asked how long DSW intended to leave the "single system use credit" in place for FES and Aggregate Power Managers (APM) customers.

Response: To clarify the response given in the Information Forum, the credit will remain in place indefinitely. It will be up to those customers whether they choose to receive the credit for use of a single transmission system or take advantage of access to the broader transmission system by paying the MSTR. It has been Western's long standing philosophy that the FES customers would not see increases in the costs of their bundled product strictly due to restructuring efforts and that philosophy is built into the MSTR calculations.

TRANSMISSION SYSTEM RESERVATION DATA

Fiscal Year Average

2005 2006 2007 2008 2009

PACIFIC NW PACIFIC SW INTERTIE PROJECT FIRM TRANSMISSION

230/345-kV

AEPCO	03-DSR-11153	40,000	40,000	40,000	40,000	40,000
AJO Improvement	96-DSR-10749	2,910	2,910	2,910	2,910	2,910
APA	DE-MS65-85WP39502	182,360	182,360	182,360	182,360	182,360
APPA-Mesa	87-BCA-10135	19,319	28,546	47,000	47,000	47,000
APPA-SWTC	87-BCA-10135	75,179	75,248	75,248	75,248	75,248
Blythe Energy	00-DSR-11087	100,000	100,000	100,000	100,000	100,000
CAWCD	93-PAO-10537	36,418	80,060	139,854	139,854	139,854
Griffith Energy	99-DSR-11034	108,000	108,000	108,000	108,000	108,000
Griffith Energy	99-DSR-11036	75,000	75,000	75,000	75,000	75,000
IID	90-PAO-10337	123,280	123,280	123,280	123,280	123,280
MCMWCD #1	87-BCA-10011	1,000	1,000	1,000	1,000	1,000
SRP	14-06-300-2002	160,000	160,000	160,000	160,000	160,000
UNS Electric	01-DSR-11113	110,000	110,000	110,000	110,000	110,000
USBR	87-BCA-10047	26,467	26,467	26,467	26,467	26,467
WAPA-SLCA	88-BCA-10149	<u>134,000</u>	<u>134,000</u>	<u>134,000</u>	<u>134,000</u>	<u>134,000</u>
		1,193,933	1,246,871	1,325,119	1,325,119	1,325,119

500-kV

Griffith Energy	99-DSR-11034	325,000	325,000	325,000	325,000	325,000
Griffith Energy	99-DSR-11035	87,000	87,000	87,000	87,000	87,000
POWEREX	01-DSR-11108	100,000	100,000	100,000	100,000	100,000
Sierra Pacific	03-DSR-11150	52,000	52,000	52,000	52,000	52,000
New Firm Transmission Service/Sales		<u>198,000</u>	<u>298,000</u>	<u>398,000</u>	<u>398,000</u>	<u>398,000</u>
		762,000	862,000	962,000	962,000	962,000
Intertie Total		1,955,933	2,108,871	2,287,119	2,287,119	2,287,119

CENTRAL ARIZONA PROJECT FIRM TRANSMISSION

APS	02-DSR-11143	35,000	35,000	35,000	35,000	35,000
CPN South Point	99-DSR-11050	240,000	240,000	240,000	240,000	240,000
UNS Electric	87-BCA-10140	<u>96,536</u>	<u>96,536</u>	<u>96,536</u>	<u>96,536</u>	<u>96,536</u>
		371,536	371,536	371,536	371,536	371,536

PROJECT USE

CAWCD	93-PAO-10537	<u>422,667</u>	<u>465,000</u>	<u>523,000</u>	<u>523,000</u>	<u>523,000</u>
		422,667	465,000	523,000	523,000	523,000
CAP Total		794,203	836,536	894,536	894,536	894,536

PARKER-DAVIS PROJECT FIRM TRANSMISSION

EXISTING FIRM TRANSMISSION SERVICE

AHA MACAV	93-PAO-10529	6,500	8,500	10,000	10,000	10,000
APA	DE-MS65-85WP39502	231,971	231,971	231,971	231,971	231,971
APPA-ED2	87-BCA-10135	28,000	29,333	32,000	32,000	32,000
APPA-Mesa	87-BCA-10135	93,813	121,440	121,440	121,440	121,440
APPA-SWTC	87-BCA-10135	194,333	196,066	199,400	199,400	199,400
APS	DE-MS65-85WP39510	124,661	125,928	127,053	127,195	127,195
CAWCD	93-PAO-10537	6,666	49,000	107,000	107,000	107,000
CRA	92-PAO-10481	10,000	10,000	10,000	10,000	10,000
IID	90-PAO-10337	160,000	160,000	160,000	160,000	160,000
SCE	95-PAO-10656	9,000	9,000	9,000	9,000	9,000
SCIP	87-BCA-10127	78,000	78,000	78,000	78,000	78,000
UNS Electric	87-BCA-10140	319,014	325,498	330,032	330,032	330,032

TRANSMISSION SYSTEM RESERVATION DATA

		Fiscal Year Average				
		2005	2006	2007	2008	2009
USBR	87-BCA-10047	25,673	25,673	25,673	25,673	25,673
WMI&DD	87-BCA-10142	<u>13,000</u>	<u>13,000</u>	<u>13,000</u>	<u>13,000</u>	<u>13,000</u>
		1,300,631	1,383,409	1,454,569	1,454,711	1,454,711

TARIFF FIRM TRANSMISSION SERVICE

AEPCO	03-DSR-11153	40,000	40,000	40,000	40,000	40,000
Blythe Energy	00-DSR-11087	85,000	85,000	85,000	85,000	85,000
Calpine	01-DSR-11118	76,000	76,000	76,000	76,000	76,000
CPN South Point	99-DSR-11050	285,000	285,000	285,000	285,000	285,000
ED-2	02-DSR-11129	2,000	2,000	2,000	2,000	2,000
FPL	01-DSR-11116	50,000	50,000	50,000	50,000	50,000
FPL	01-DSR-11117	30,000	30,000	30,000	30,000	30,000
Sundance Energy	01-DSR-11119	<u>320,000</u>	<u>320,000</u>	<u>320,000</u>	<u>320,000</u>	<u>320,000</u>
		888,000	888,000	888,000	888,000	888,000

SLCA/IP FIRM ELECTRIC SERVICE

APPA-ED2	87-BCA-10001	7,857	7,857	7,857	7,857	7,857
AK-CHIN	87-BCA-10000	2,989	2,989	2,989	2,989	2,989
CRA	87-BCA-10003	642	642	642	642	642
CRC	87-BCA-10004	23,408	23,408	23,408	23,408	23,408
CRIT	02-DSR-11360	4,728	4,728	4,728	4,728	4,728
ED-3	87-BCA-10005	5,192	5,192	5,192	5,192	5,192
ED-4	87-BCA-10006	3,868	3,868	3,868	3,868	3,868
ED-5	87-BCA-10008	2,518	2,518	2,518	2,518	2,518
ED-7	87-BCA-10010	2,497	2,497	2,497	2,497	2,497
FMIT	02-DSR-11362	268	268	268	268	268
Gila River	02-DSR-11363	13,216	13,216	13,216	13,216	13,216
MCMWCD #1	87-BCA-10011	2,663	2,663	2,663	2,663	2,663
Safford, AZ	87-BCA-10016	806	806	806	806	806
SCIP	87-BCA-10018	1,555	1,555	1,555	1,555	1,555
Thatcher, AZ	87-BCA-10020	414	414	414	414	414
Tohono O'odham	02-DSR-11370	1,984	1,984	1,984	1,984	1,984
WMI&DD	87-BCA-10021	268	268	268	268	268
YPG	87-BCA-10023	<u>343</u>	<u>343</u>	<u>343</u>	<u>343</u>	<u>343</u>
		75,216	75,216	75,216	75,216	75,216

P-DP Total	2,263,847	2,346,625	2,417,785	2,417,927	2,417,927
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MULTI-SYSTEM

AEPCO	03-DSR-11153	0	0	0	0	40,000
APA	DE-MS65-85WP39502	0	0	0	0	365,690
APPA-Mesa	87-BCA-10135	0	0	0	0	121,440
APPA-SWTC	87-BCA-10135	0	0	0	0	199,400
CAWCD	93-PAO-10537	0	0	0	0	136,545
IID	90-PAO-10337	0	0	0	0	160,000
UNS Electric	87-BCA-10140	0	0	0	0	330,032
USBR	87-BCA-10047	0	0	0	0	25,673
New Firm Transmission Service Sales		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>78,000</u>
		0	0	0	0	1,456,780
Multi-System Total		0	0	0	0	1,456,780

COST OF FIRM TRANSMISSION SERVICE BY CONTRACTOR CONVERGENCE RATE DESIGN METHODOLOGY - APPLY MSTR 5TH YEAR

		Existing FY05	Proposed FY05	Proposed FY06	Proposed FY07	Proposed FY08	Proposed FY09
		Rates	Rates	Rates	Rates	Rates	Rates
	P-DP	\$1.08 /kW-Mo	\$1.09 /kW-Mo	\$1.11 /kW-Mo	\$1.12 /kW-Mo	\$1.14 /kW-Mo	\$1.15 /kW-Mo
	INTERTIE 230/345-kV	\$1.00 /kW-Mo	\$1.03 /kW-Mo	\$1.06 /kW-Mo	\$1.09 /kW-Mo	\$1.12 /kW-Mo	\$1.15 /kW-Mo
	INTERTIE 500-kV	\$1.44 /kW-Mo	\$1.38 /kW-Mo	\$1.32 /kW-Mo	\$1.27 /kW-Mo	\$1.21 /kW-Mo	\$1.15 /kW-Mo
	CAP	\$0.82 /kW-Mo	\$0.89 /kW-Mo	\$0.95 /kW-Mo	\$1.02 /kW-Mo	\$1.08 /kW-Mo	\$1.15 /kW-Mo
	MSTR	n/a	n/a	n/a	n/a	n/a	\$1.15 /kW-Mo
		[A]	[B]	[C]	[D]	[E]	[F]
1	AHA MACAV	\$84,240	\$85,332	\$113,016	\$134,640	\$136,320	\$138,000
2	AJO Improvement	34,920	35,968	37,015	38,063	39,110	40,158
3	AK-CHIN	38,737	39,240	39,742	40,244	40,746	41,248
4	APS	1,960,007	2,008,670	2,074,179	2,138,202	2,189,202	2,238,291
5	Blythe Energy, LLC	2,301,600	2,351,880	2,402,160	2,452,440	2,502,720	2,553,000
6	Calpine Energy Services	984,960	997,728	1,010,496	1,023,264	1,036,032	1,048,800
7	CPN South Point, LLC	6,055,200	6,293,160	6,531,120	6,769,080	7,007,040	7,245,000
8	CRA	137,920	139,708	141,496	143,284	145,072	146,860
9	CRC	303,368	307,300	311,233	315,165	319,098	323,030
10	CRIT	61,275	62,069	62,863	63,658	64,452	65,246
11	ED-2	490,627	496,987	521,070	563,563	570,595	577,627
12	ED-3, P	67,288	68,161	69,033	69,905	70,777	71,650
13	ED-4, P	50,129	50,779	51,429	52,079	52,729	53,378
14	ED-5, P	32,633	33,056	33,479	33,902	34,325	34,748
15	ED-7, M	32,361	32,781	33,200	33,620	34,039	34,459
16	FPL Energy Power	1,036,800	1,050,240	1,063,680	1,077,120	1,090,560	1,104,000
17	FMIT	3,473	3,518	3,563	3,608	3,653	3,698
18	Gila River	171,279	173,500	175,720	177,940	180,161	182,381
19	Griffith Energy LLC	9,315,360	9,094,488	8,873,616	8,652,744	8,431,872	8,211,000
20	MCMWCD #1	46,512	47,320	48,127	48,935	49,742	50,549
21	POWEREX	1,728,000	1,658,400	1,588,800	1,519,200	1,449,600	1,380,000
22	Safford, AZ	10,446	10,581	10,717	10,852	10,987	11,123
23	SCIP	1,031,033	1,044,398	1,057,763	1,071,129	1,084,494	1,097,859
24	SCE	116,640	118,152	119,664	121,176	122,688	124,200
25	Sierra Pacific Resources	898,560	862,368	826,176	789,984	753,792	717,600
26	SRP	1,920,000	1,977,600	2,035,200	2,092,800	2,150,400	2,208,000
27	Sundance Energy, LLC	4,147,200	4,200,960	4,254,720	4,308,480	4,362,240	4,416,000
28	Thatcher, AZ	5,365	5,435	5,505	5,574	5,644	5,713
29	Tohono O'odham	25,713	26,046	26,379	26,713	27,046	27,379
30	WAPA-SLCA	1,608,000	1,656,240	1,704,480	1,752,720	1,800,960	1,849,200
31	WMI&DD	171,953	174,182	176,411	178,640	180,869	183,098
32	YPG	4,445	4,503	4,561	4,618	4,676	4,733
33	New Intertie 500-kV Sales	3,421,440	3,283,632	4,734,624	6,046,416	5,769,408	5,492,400
		\$38,297,484	\$38,394,382	\$40,141,237	\$41,759,758	\$41,721,049	\$41,680,428
APPLY MSTR 5TH YEAR							
34	AEPCO	998,400	1,019,520	1,040,640	1,061,760	1,082,880	552,000
35	APA	5,194,664	5,299,285	5,403,906	5,508,526	5,613,147	5,046,522
36	APPA-Mesa	1,447,644	1,470,360	1,977,771	2,249,828	2,287,150	1,675,872
37	APPA-SWTC	3,420,704	3,480,416	3,564,048	3,668,965	3,729,554	2,751,720
38	CAWCD	523,407	537,638	1,669,867	3,269,938	3,338,262	1,884,321
39	IID	3,552,960	3,624,221	3,695,482	3,766,742	3,838,003	2,208,000
40	UNS Electric	5,454,421	5,547,616	5,727,021	5,882,351	5,977,396	6,072,442
41	USBR	650,326	664,167	678,008	691,850	705,691	354,287
42	Additional Multi-System Sales	-	-	-	-	-	1,076,400
		\$21,242,526	\$21,643,223	\$23,756,743	\$26,099,960	\$26,572,083	\$21,621,564

