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September 12, 2006

Mr. J. Tyler Carlson, Regional Manager  
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	<i>[Signature]</i>	<i>Goode</i>
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Dear Mr. Carlson:

The following comments are submitted on behalf of the City of Escondido (Escondido) regarding the Western Area Power Administration's (Western) notice of proposed allocation from the Parker-Davis Project. The notice was published at 71 Fed. Reg. 40503 (July 17, 2006).

Escondido was involved in two applications seeking an allocation of Parker-Davis Project power. The first was a combined application submitted on behalf of the San Luis Rey Settlement Parties seeking an allocation of Parker-Davis Project power to facilitate the implementation of the San Luis Rey River Indian Water Rights Settlement Act, Public Law 100-675 (Title I), 102 Stat. 4000 (November 17, 1988), as amended. All of the Settlement Parties including Escondido are located in northern San Diego County, California, within the marketing area for Parker-Davis Project power referred to in 70 Fed. Reg. 74805 (December 16, 2005). The second application (by Escondido alone) focused on one end use, Escondido's Hale Avenue Resource Recovery Facility (HARRF), Escondido's principal sewage treatment facility.

As a representative of both the Settlement Parties and Escondido, I attended the public information forum hosted by Western in Ontario, California, on August 31, 2006. Escondido appreciates the information made available at that forum and this opportunity to respond to the proposed allocation.

The information presented at the public information forum shows that Western went through a very thorough and methodical process to arrive at the proposed allocations. Giving first consideration for eligibility to applicants in the Parker-Davis Project marketing area who do not have a contract with Western for Federal power

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resources conforms to the general eligibility criteria published in 70 Fed. Reg. 74805. The procedure set forth in 71 FR 40503 and at the information forum to allocate Parker-Davis Power amongst those first priority entities was well reasoned, giving consideration for widespread use of the Federal resource, magnitude of the benefits, and load. Because proper procedures were followed and a logical rationale for the Parker-Davis allocation was presented in 71 FR 40503 and at the information forum, Escondido supports the proposed allocations and requests that the allocations should be finalized as proposed.

While Escondido would have appreciated greater consideration for its independent allocation request for use at HAARF, Escondido understands there was a limited quantity of power available and a significant number of applicants. However, Escondido hopes that if for any reason one of the current successful applicants is unable to receive its proposed allocation you will consider the possibility of allocating that power to Escondido for use at HAARF. In addition, if in the future any additional power is available for allocation we hope that you will also consider allocating that additional power to Escondido.

Thank you for your consideration of these comments.

Sincerely,



Donald R Lincoln  
Attorney for the City of Escondido

DRL/ps

cc: Jeffrey R. Epp, City Attorney  
City of Escondido  
Mary Ann Mann, Utilities Manager  
City of Escondido  
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City of Escondido  
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San Luis Rey Settlement Parties