

H O H O K A M

The Power of Choice

October 19, 2004

Ms. Jean Gray
Assistant Regional Manager
Western Area Power Administration
Desert Southwest Region
P.O. Box 6457
Phoenix, Arizona 85005-6457

Re: Section 12 Language - Parker-Davis General Power Contract Provisions

Dear Ms. Gray:

As a prospective Parker-Davis resource contractor, we have been following the myriad of comments and discussion regarding the proposed GPCP language. I do not envy your position in trying to wade through it all and to reach a solution which will preserve the interests of the United States and your many power contractors.

I must admit that I do not fully understand all of the implications of the proposed language or of the many language change suggestions you have received. I also do not fully understand what effect the language might conceivably have on the Hohokam Irrigation and Drainage District if we are ultimately awarded a Parker-Davis contract. I'm not sure anyone truly knows these things.

It does appear that there is a great deal of disagreement among all the involved parties and I'm confident that, whatever language is adopted as final, will not fully satisfy the concerns of all those involved.

I have read and discussed the string of events that led up to the Navopache Electric Cooperative CRSP allocation issue and I have read their letter of concern and suggested language for Section 12 of the GPCP. I have not yet formed an opinion in that regard.

I am a little uneasy about the language in 12.2 regarding the "selling, leasing or otherwise disposing" of distribution system and how that could be interpreted. Also, "a change in beneficiaries", in that Section. It seems a little ambiguous and I'm not sure if the sale or lease of a small portion of a distribution system would raise an issue or if a "change" in a small portion of the beneficiaries would also trigger action. My concern may well be due to my lack of understanding as stated above. If so, I apologize.

I plan to attend your meeting scheduled on October 22 in hopes of gaining a better understanding of the issues.

HOHOKAM IRRIGATION & DRAINAGE DISTRICT

142 South Arizona Blvd., Coolidge, AZ 85228-4725

PHONE: [520] 723-7751 • FAX: [520] 723-4939 • E-MAIL: hohokam@c2i2.com

Ms. Jean Gray
October 19, 2004
Page Two

Thank you for this opportunity to comment. I remain confident that you and your associates at Western will strive to balance the interests of your customers and of the United States to the best of your abilities.

Sincerely,


Jack C. Long
Manager