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November 1, 2002

J. Tyler Carlson, Regional Manager
Desert Southwest Customer Service Region
Western Area Power Administration
P.O. Box 6457
Phoenix, Arizona 85005-6457

Re: Post 2008 Re-marketing of Parker-Davis Project Power

Dear Mr. Carlson:

The following comments are submitted regarding the Western Area Power Administration's (Western) notice of proposal to re-market Parker-Davis Project power associated with long-term firm power contracts that will expire on September 30, 2008. The notice was published at 67 Fed. Reg. 51580 (August 8, 2002). The comments are submitted on behalf of the following eight tribal and non-tribal entities:

San Luis Rey River Indian Water Authority
Pala Band of Mission Indians
Rincon Band of Mission Indians
City of Escondido

La Jolla Band of Mission Indians
Pauma Band of Mission Indians
San Pasqual Band of Mission Indians
Vista Irrigation District.

These entities are the beneficiaries 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 (Settlement Act). They are referred to herein as the Settlement Parties. The Settlement Parties intend to apply for an allocation of Parker-Davis Project power to facilitate the implementation of the Settlement Act. All of the Settlement Parties are located in northern San Diego County, California, within the marketing area for Parker-Davis Project power referred to in 67 Fed. Reg. at 51580, and more specifically defined in 49 Fed. Reg. 50582 (December 28, 1984) Conformed General Consolidated Power Marketing Criteria or Regulations for Boulder City Area Projects.

Representatives of the Settlement Parties attended public information and public comment forums hosted by Western in Ontario, California, on September 18, 2002, and October 10, 2002, respectively. We appreciate the information received at those forums and take this opportunity to respond to three specific issues raised by Western:

1) applicability of Western's 1995 Power Marketing Initiative (PMI) to Parker-Davis Project power;

- 2) the percentage of power resources to be extended to existing customers; and
- 3) the size of the resource pool.

Applicability of PMI

Western's Energy Planning and Management Program (EPAMP) consists of two components: the power marketing initiative (PMI) and integrated resources planning (IRP). We recommend that the IRP component of EPAMP be eliminated. Since 1995, when the IRP was implemented under EPAMP, the management of electricity has changed dramatically. Existing and proposed Federal Energy Regulatory Commission (FERC) orders (such as orders 888, 889, 2000 and the proposed standard market design), state requirements (such as SB 1078, California Renewables Portfolio Standard Program), and California restructuring have superseded IRP conceptually and practically. Today, they provide the framework for efficient electrical energy use.

Percentage of power resources to be extended to existing customers

Western proposes that a resources pool of six percent of available Parker-Davis Project power be made available for new customers. As discussed below, we recommend that Western increase the pool to at least ten percent in order to expand the potential customer base to meet the Reclamation objective of widespread use of the resource. In addition, we would support a long-term purchase of power by Western (up to 25 MW) to be integrated with Parker-Davis Project power to increase the size of the pool. In the absence of an expanded pool, it is questionable whether the proposed PMI would even cover the Native American requests for Parker-Davis Project power. There is a precedent for increasing the size of the resource pool in the Colorado River Storage Project allocation program, 66 Fed. Reg. 31910 (June 13, 2001).

Size of resource pool

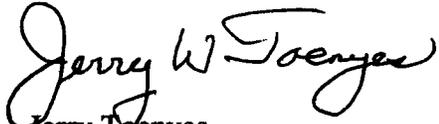
We recommend that considerable care be given to your decision about the portion of the resource pool that should be extended to existing customers. The Settlement Parties represent a substantial group of Native Americans and Californians in need of Parker-Davis Project power.

We also recommend that power made available to the resource pool not include any withdrawable power. It is probable that each allottee will receive only a relatively small allocation of Parker-Davis Project power. Such small amounts should not be subject to reduction through withdrawal. Accordingly, we request that no withdrawable power be included in the resource pool to be established by Western in order to ensure the continued availability of sufficient power for allocation to eligible entities such as the Settlement Parties.

Also, with regard to the resources to be extended, we recommend a 20-year term for contracts as contained in the PMI and that all ancillary services (reserves, regulation, etc.) be included with the power to be allocated from the resource pool. We also request that Western work with the existing control area operator to ensure that the allottees receive credit for the Parker-Davis ancillary services.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Jerry W. Toenyes". The signature is written in a cursive style with a large, looping initial "J".

Jerry Toenyes
For the Settlement Parties