



# IMPERIAL IRRIGATION DISTRICT

OPERATING HEADQUARTERS • P. O. BOX 937 • IMPERIAL, CALIFORNIA 92251

November 5, 2002

Via Fax (602)-352-2490 and Federal Express

Mr. J. Tyler Carlson  
Desert Southwest Regional Manager  
Western Area Power Administration  
615 S. 43<sup>rd</sup> Avenue  
Phoenix, AZ 85005

DSW REGIONAL OFFICE OFFICIAL FILE COPY		
Date	Initial	Code
NOV 7 2002		
	<i>[Signature]</i>	G0000
	<i>[Signature]</i>	G6000
	<i>[Signature]</i>	G6002

Dear Mr. Carlson:

The Imperial Irrigation District ("IID") offers the following comments on the proposal of the Western Area Power Administration ("Western") to re-market power from the Parker-Davis Project ("Project"), as published in the *Federal Register*, Volume 67, Number 153 on Thursday, August 8, 2002.

IID is a community-owned utility that provides electric power to more than 105,000 homes, businesses and industries in the southeastern corner of the California desert. Established in 1911 under the California Irrigation District Act, IID is governed by a five-member Board of Directors elected by the public. IID is one of the original contractors for Parker-Davis power and has been a Parker-Davis customer continuously since 1948.

IID is a qualified preference customer, as defined by federal reclamation law and Western policies. It is, therefore, entitled for an extension of its Project entitlement for a period of 20 years in accordance with the proposal set forth in the August 8 *Federal Register* notice.

## A. IID Supports Western's Proposed Re-Marketing Plan

IID supports Western's proposal to apply the Power Marketing Initiative ("PMI") in Subpart C of EPMP to the Parker-Davis Project. Under that proposal, IID and other existing Parker-Davis customers would receive 94 percent of their current power allocations for a period of 20 years. Six percent of the available Parker-Davis resource would be set aside to allocate to new preference customers, including Native American tribes. To the extent existing customers' allocations are reduced by the resource set aside, new customers would be required to reimburse existing customers for undepreciated replacement advances. Western also proposes to waive the requirement for "utility status" for Native American tribes

IID believes that Western's proposal for re-marketing Parker-Davis power is equitable and well-grounded in precedent and policy. We urge its final approval.

## **B. Parker-Davis Power is a Vital Part of IID's Resource Mix**

Certainty about our Parker-Davis allocation will provide important resource stability for IID and for the residential, commercial and industrial consumers we serve. In light of the recent dramatic volatility in the electricity markets in California and the West, the stability that renewal of long-term contracts will provide to IID is more valuable than ever. Certainty as to the amount and duration of our future Parker-Davis allocation will also enable IID to engage in effective long-term planning to ensure our ability to meet current and future load demand.

IID's current allocation of Parker-Davis power is approximately five percent of our total resource portfolio. Although the Parker-Davis allocation is a relatively small part of IID's total resources, it is one of our lowest cost resources and, as such, is critical to our ability to maintain affordable electric rates. If IID's allocation of Parker-Davis power were eliminated or significantly reduced, we would have to develop a substitute resource or purchase replacement power from the market. Given today's prevailing electricity prices and market volatility, the replacement cost for this power would be substantial. That additional cost would have to be passed directly through to our retail customers.

IID's allocation of Parker-Davis power plays an important role in our local and regional economy. Unemployment in southeastern California is higher than the national average and the per capita income of our customers is relatively low. In addition, the extreme temperatures in this part of California result in higher per capita energy use than in other parts of the country.

## **C. Western's Proposal is in the Best Interest of the United States**

Long-term contract extensions will help ensure timely repayment of the federal investment in the Parker-Davis Project by providing relative assurance of a continuing revenue stream to the U.S. Treasury. Parker-Davis power customers are responsible for repayment of all project costs allocated to power interests, including the full cost of power facilities, with interest, and operation and maintenance costs.

Western's prior contract experience with existing Parker-Davis customers demonstrate their creditworthiness and dependability and underscores for the government the value of a long-term relationship. Extension of the current allocation on a long-term basis, as provided for in the PMI, would avoid the difficulties of short-term contracts and the administrative burdens associated with them.

**D. There is Strong Precedent for Applying the PMI to the Parker-Davis Project.**

Although the Record of Decision for the EPMP provides that application of the Power Marketing Initiative will be decided on a project-by-project basis, there is strong precedent for Western's proposal to apply it to the Parker-Davis Project. Since 1995, Western has successfully implemented the PMI at the Pick-Sloan Missouri Basin Program – Eastern Division, the Loveland Area Projects, the Salt Lake City Area/Integrated Projects and the Central Valley Project.

The central features of the PMI, which assure existing customers that they will receive a "major portion" of their current allocations while allowing Western the flexibility to offer a "modest percentage" of the resource to new customers, represent a balanced, equitable and tested approach to contract renewal. The PMI has worked well for Western, for the federal government and for customers. Absent a compelling rationale, IID sees no reason to undermine that success by abandoning or significantly altering the PMI at the Parker-Davis Project.

Application of the PMI to the Parker-Davis Project also reinforces Western's policy of "regional equity" by treating preference customers in the Parker-Davis marketing area in a manner substantially identical to the way customers were treated in the Pick-Sloan Missouri Basin Project, Colorado River Storage Project and Central Valley Project. Although there are slight differences in the size and timing of the resource "set aside" for new customers at each project, the six percent proposed for the Parker-Davis Project is consistent with set aside at the other projects.

**E. Application of the PMI is Likely to Have Positive Environmental Effects**

One of the goals of the EPMP is to encourage efficient energy use by existing Western customers by requiring Integrated Resource Planning (IRP) in exchange for Western's commitment to extend long-term firm power contracts. Western's EPMP Environmental Impact Statement (EIS) also noted that longer term contracts are positive for the environment because customers will be more likely to invest in renewable resources if they have a stable foundation of federal hydropower. The EIS indicated that short-term contracts could lead customers to develop resources that are cheaper in the short term, but more adverse environmentally.

**F. Response to Comment That IID's Allocation is Subject To Reduction**

A comment has been made during Western's public information and public comment forms on Parker-Davis contract extensions to the effect that IID's 30 MW allocation of Parker-Davis power is subject to some special recapture condition. We have asked our special counsel, Messrs. Duncan and Allen, to investigate whether this comment has any basis in fact. Their conclusion, contained in a separate memorandum submitted simultaneously with these comments, comports with our own understanding of the original condition attached to IID's 30 MW allocation of Davis Project power.

Until 1954, the Bureau of Reclamation conditioned 15 MW of IID's 30 MW allocation of Davis power on demonstrating its need for its full allocation in light of the then-anticipated commencement of operation of IID's Pilot Knob power plant on the All American Canal. In 1954 the Bureau determined that IID had met the "need" requirement and no reduction would be made. Since the year 1954 when IID satisfied the Bureau's condition, IID's firm electric service contracts for Parker-Davis power have consistently allocated at least 30 MW of nonwithdrawable power to IID. Thus, there is no basis to support the suggestion made in Western's public meetings that Western has any grounds to subject IID's allocation of Parker-Davis power to any special "recapture" or reduction.

Finally, because of the comment just addressed regarding the potential withdrawability of IID's Parker-Davis power, the question may arise whether any Parker-Davis power is withdrawable for purposes of addressing certain Parker-Davis power contractors' responsibility under what is informally referred to as the "San Luis Rey Settlement Act," since the author of the comment has implied that all Parker-Davis power contractors might somehow be responsible under that Act. That implication is not correct, for the reasons set forth in the attached letter of January 19, 2001 from the Bureau's Regional Director Ronald W. Johnson to Senator Harry Reid.

\*

\*

\*

We appreciate the opportunity to submit these comments. We hope that you will grant IID's request, made in Western's Ontario public comment forum, to allow interested parties to reply to comments made to Western as of November 6, 2002 in this matter.

We are joined in our support of Western's PMI process by various representatives of electric customers in our service area whose comments we also attach.

Sincerely yours,



JESSE P. SILVA  
General Manager

**Attachments**

gar:Parker-Davis Comments



November 5, 2002

Mr. J. Tyler Carlson  
Western Area Power Administration  
Desert Southwest Regional Manager  
P.O. Box 6457  
Phoenix, AZ 85005-6457

Dear Mr. Carlson:

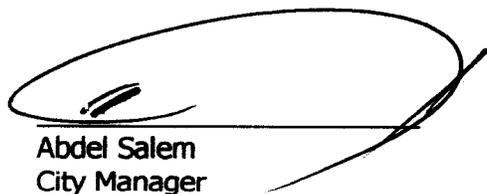
On behalf of the City of El Centro, I appreciate the opportunity to comment on the Western Area Power Administration's ("Western") proposal to re-market power from the Parker-Davis Project.

Electric service in our community is provided by the Imperial Irrigation District, which was an original contractor for Parker-Davis power and which receives a current allocation of approximately 30 megawatts from the Parker-Davis Project. This power is a vital part of the resource mix of IID and is essential to its ability to continue to provide reliable, affordable electricity to homes and businesses in El Centro.

I support Western's proposal to extend a major portion (94 percent) of current customer allocations for 20 years, and to create a six percent reserve for new customers. This is an equitable approach that will provide resource certainty and stability for consumers in our community, yet allow new customers reasonable access to Parker-Davis power.

I urge you to give final approval to the pending Parker-Davis re-marketing proposal.

Sincerely,



Abdel Salem  
City Manager

*Office of the City Manager*

1275 Main Street, El Centro, CA 92243 (760) 337-4540 Fax (760) 352-6177

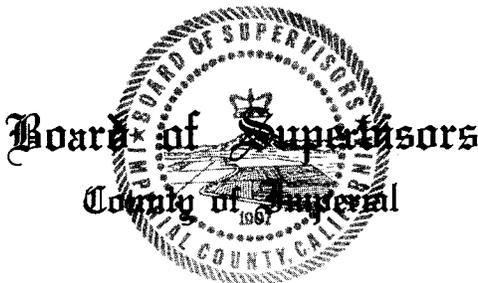
DISTRICT 1  
TONY P. TIRADO  
940 W. MAIN ST., SUITE 209, EL CENTRO, CA 92243

DISTRICT 2  
HANK KUIPER  
940 W. MAIN ST., SUITE 209, EL CENTRO, CA 92243

DISTRICT 3  
JOE MARUCA  
940 W. MAIN ST., SUITE 209, EL CENTRO, CA 92243

DISTRICT 4  
GARY WYATT  
940 W. MAIN ST., SUITE 209, EL CENTRO, CA 92243

DISTRICT 5  
WALLY LEIMGRUBER  
940 MAIN STREET, SUITE 209, EL CENTRO, CA 92243



COUNTY EXECUTIVE OFFICE  
COUNTY ADMINISTRATION CENTER  
940 MAIN STREET, SUITE 208  
EL CENTRO, CA 92243-2871  
TELEPHONE: (760) 482-4290

FAX: (760) 352-7876

November 5, 2002

Mr. J. Tyler Carlson  
Western Area Power Administration  
Desert Southwest Regional Manager  
P.O. Box 6457  
Phoenix, AZ 85005-6457

Dear Mr. Carlson:

The County of Imperial would like to take this opportunity to comment on the Western Area Power Administration's ("Western") proposal to re-market power from the Parker-Davis Project.

Electric service in our community is provided by the Imperial Irrigation District, a publicly owned entity, which was an original contractor for Parker-Davis power and which receives a current allocation of approximately 30 megawatts from the Parker-Davis Project. This power is a vital part of the resource mix of IID and is essential to its ability to continue to provide reliable, affordable electricity to homes and businesses in Imperial County.

The Board of Supervisors of the County of Imperial supports Western's proposal to extend a major portion (94 percent) of current customer allocations for 20 years, and to create a six percent reserve for new customers. This is an equitable approach that will provide resource certainty and stability for consumers in our community, yet allow new customers reasonable access to Parker-Davis power.

**We urge you to give final approval to the pending Parker-Davis re-marketing proposal.**

Sincerely,

Hank Kuiper, Chairman  
Imperial County Board of Supervisors



# United States Department of the Interior

BUREAU OF RECLAMATION  
Lower Colorado Regional Office  
P.O. Box 61470  
Boulder City, NV 89006-1470

IN REPLY REFER TO:  
BCOO-4800  
PIO-1.10

JAN 1 9 2001

Honorable Harry Reid  
United States Senate  
Committee on Appropriations  
Washington DC 20510-6025

Dear Senator Reid:

This response to your letter of November 2, 2000, amplifies our earlier response of December 4, 2000, and specifically addresses each of the questions posed in your letter. Please be assured that Reclamation is fully cognizant of the importance of Parker-Davis Project (P-DP) capacity and energy to Nevada contractors. Although the the San Luis Rey Settlement Act language included in the FY 2001 Energy and Water Development Appropriations Act may perhaps be susceptible to differing interpretations, Reclamation intends to implement the Congressional directives in a rational manner which does not require the use of Parker-Davis Project withdrawable power.

Implementation of the legislation will be through contractual amendments, as the legislation specifies, with the Walton-Mohawk Irrigation and Drainage District and the Yuma County Water Users Association. These Project Use Power (PUP) users are identified as the Yuma Area Contractors (YAC) in the new legislation. Reclamation will not agree to contractual amendments which would permit the withdrawal of P-DP power as a means to satisfy the full range of purposes served by YAC or to satisfy the needs of the San Luis Rey Settlement Parties which the YAC are now obligated to serve from any of their various energy resources, in accordance with the new legislation.

I respond to your questions as follows:

**Question:** How will the Bureau provide for the "full range of purposes" without calling on the use of withdrawable power?

**Response:** In 1996 Reclamation entered into contracts with PUP users in Yuma, Arizona. These contracts, which are referred to in the recent legislation, accomplished a variety of purposes. The maximum quantity of power which the Federal government needed to have on hand to serve PUP load was agreed to, 40.5 MW, thus eliminating the need for additional reserves and freeing up power which could then be marketed by Western (to

Nevada Parker-Davis Project customers, among others). The agreed upon maximum quantity of 40.5 MW was based on then available data and included some flexibility because actual PUP load may vary from month to month and season to season. These contracts further anticipated that the YAC would aggregate the PUP power and load with their other power resources and power loads, with the expectation that scheduling efficiencies would result in significant conserved energy which might then be used by the YAC. Agreements were also reached for the advance funding of the OM&R costs attributable to that power to reduce the need for Federal appropriations.

Reclamation has been meeting with the YAC to discuss the manner in which the recent legislation might be incorporated into the existing contracts to fulfill Congressional intent. Reclamation stated in these meetings that Reclamation would not agree to increasing the maximum 40.5 MW of PUP specified in the contracts referenced by the legislation as a means to supply PUP power to serve the YAC's "full range of purposes." Reclamation was equally adamant that the 40.5 MW allocation would not be enlarged as a means to provide additional PUP power to the YAC to supply to the San Luis Rey Settlement Parties. These principles were accepted by YAC representatives in attendance at these meetings and will form the basis for the contractual amendments implementing the legislation.

Although negotiations are currently in progress with the YAC and the San Luis Rey Settlement Parties to determine precisely how to implement the recent legislation, it is Reclamation's contention that the maximum amount of power used to serve "the full range of purposes" of the YAC, or to meet the YAC's new statutory obligation to provide power to the San Luis Rey Settlement Parties, will be derived from a combination of (1) the energy conserved through scheduling efficiencies of the YAC's aggregated energy resources, and (2) the energy within the YAC's maximum 40.5 MW not needed to serve the YAC's actual PUP load at a given point in time. The YAC may choose, however, to meet their obligation to the San Luis Rey Settlement Parties with other power resources available to them.

Question: How will the Bureau insure that the implementation of this provision will have no impact on the current contracts held with Nevada contractors for Parker-Davis capacity and energy?

Response: Current contracts held by Nevada contractors for P-DP capacity and energy can only be impacted if Reclamation institutes a formal process to withdraw power to serve new P-DP PUP load requirements. Other contracts, referred to in the new legislation, limit the maximum amount of PUP available to the YAC to 40.5 MW to serve their existing connected PUP load. Reclamation and the YAC are in agreement that additional P-DP power will not be withdrawn in excess of the current contractual amount either to satisfy "the full range of purposes" served by the YAC or to satisfy the YAC's new obligation to satisfy power needs of the San Luis Rey Settlement Parties. This

understanding can be incorporated into the contractual amendments necessary to effectuate the new legislation.

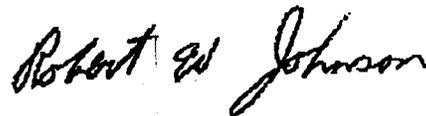
**Question:** How will the Bureau insure that this language does not set a precedent for examining their requests for project use power in the Parker-Davis contract renewal process?

**Response:** At the outset, it is important to note that we do not view the language as making the San Luis Rey a Parker-Davis contractor, and we do not plan to include San Luis Rey loads in analyses of PUP needs. When the current firm electric power contracts expire, Reclamation anticipates that based on standard practices the following procedure will be implemented. First, Reclamation will review and approve PUP load requests based on actual connected PUP load using the same criteria as in the past. The YAC PUP allocation is expected to include, as it always has, the flexibility to meet monthly and seasonal varying PUP need. YAC may then use that power, including the energy savings achieved through the aggregation of other energy resources and loads, to serve their "full range of purposes" and, if they choose, to satisfy their obligation to serve the San Luis Rey Settlement Parties power demands. Power not allocated for PUP needs will then be made available to firm electric contractors.

Please note that the above responses to the questions posed in your letter of November 2, 2000, are premised on our sincere belief that the present negotiations with YAC will result in contractual amendments permitting the YAC to supply the power needs of the San Luis Rey Settlement Parties in a manner which does not necessitate the withdrawal of P-DP power. Congress provided, however, that if for any reason the YAC do not supply power for the San Luis Rey Settlement Parties, the Secretary must furnish this power in accordance with Exhibit E "Project Use Power" of the Agreement between Water and Power Resources Service, Department of the Interior, and Western Area Power Administration, Department of Energy (March 26, 1980). Exhibit E contemplates the withdrawal of power to meet additional PUP needs if the allocation of PUP previously reserved is insufficient to do so.

We feel confident that negotiations with YAC will reach a successful conclusion and that Nevada will not be harmed by the implementation of the San Luis Rey Settlement Act language included in the FY 2001 Energy and Water Development Appropriations Act. If you have further questions, please feel free to call me or my Lower Colorado Region Power Manager, Ron Smith, at (702) 293-8636.

Sincerely yours,



Robert W. Johnson  
Regional Director

Ms. Dornitila Lopez  
Contracting Officer  
AF Base Conversion Agency  
AF BCA/DB  
3430 Bundy Avenue, Bldg 3408  
March AFB CA 92518-1504

Mr. Mike Keeling  
Contracting Officer  
AFFTC/PK  
5 South Wolfe Avenue, Bldg 2800  
Edwards AFB CA 93524

Mr. Anthony Helton  
General Manager  
Aha Macav Power Service  
PO Box 6870  
Mohave Valley AZ 86440

Mr. Del Wakimoto  
Chairman of the Board  
Aha Macav Power Service  
PO Box 6870  
Mohave Valley AZ 86446

Mr. Larry D. Huff  
Arizona Electric Power Cooperative, Inc.  
PO Box 670  
Benson AZ 85602-0670

Ms. Cheryl Cretin  
Contracting Officer  
Attn: STBYP-PW-R & EH-P & PN-E-MP  
Army Proving Ground  
Yuma AZ 85365-9104

Mr. Jeff Hinkins  
Supervisory Electrical Engineer  
Colorado River Agency  
Bureau of Indian Affairs  
Route 1 Box 9C  
Parker AZ 85344

Ms. Paula K. Fowler  
Public Utilities Specialist  
Colorado River Agency  
Bureau of Indian Affairs  
Route 1 Box 9C  
Parker AZ 85344

Mr. Duane Alston, P.E.  
Power Manager  
San Carlos Irrigation Project  
Bureau of Indian Affairs  
PO Box 250  
Coolidge AZ 85228

Mr. Michael S. Miller  
Public Utilities Specialist  
San Carlos Irrigation Project  
Bureau of Indian Affairs  
PO Box 250  
Coolidge AZ 85228

Mr. Neil Messer  
Acting Supervisory Electrical Engineer  
Colorado River Agency  
Bureau of Indian Affairs  
Route 1 Box 9c  
Parker AZ 85344

Mr. George M. Caan  
Director  
Colorado River Commission of Nevada  
555 E Washington Street, Suite 3100  
Las Vegas NV 89101-1048

Mr. Gerald Lopez  
Senior Deputy Attorney General  
Colorado River Commission of Nevada  
555 E. Washington Street, Suite 3100  
Las Vegas NV 89101

Mr. Jack Stonebocker  
Colorado River Commission of Nevada  
555 East Washington Ave  
Suite 3100  
Las Vegas NV 89101

Ms. Beverly A. Colbert (CMD)  
Contract Specialist  
Contracts Management Division  
US Department of Energy  
PO Box 98518  
Las Vegas NV 89193-8518

Mr. Charles Reinhold  
Consultant  
Electric Resources Strategies  
1855 E. Southern Avenue, Suite 201  
Mesa AZ 85204

Mr. Henry Olstowski  
General Superintendent, Power Generation  
Imperial Irrigation District  
PO Box 937  
Imperial CA 92251

Mr. Guillermo Yurjar  
Operation Plant Superintendent  
Imperial Irrigation District  
PO Box 937  
Imperial CA 92251

Mr. Jeff Warner  
K.R. Saline & Associates  
160 North Pasadena, Suite 101  
Mesa AZ 85201-6764

Ms. Ann Finley  
The Metropolitan Water District of Southern California  
PO Box 54153, Terminal Annex  
Los Angeles CA 90054-0153

Mr. Robert Walker  
Electrical Department Manager  
City of Needles  
817 Third Street  
Needles CA 92363

Mr. Timothy Killen (EAMD)  
Engineering & Asset Management Division  
US Department of Energy  
PO Box 98518  
Las Vegas NV 89193-8518

Mr. Grant R. Ward  
General Manager  
Electrical Districts Nos 1 and 3  
41630 W. Louis Johnson Drive  
Maricopa AZ 85239-5402

Mr. Ronald E. Cox  
Assistant General Manager, Power Department  
Imperial Irrigation District  
PO Box 937  
Imperial CA 92251

Mr. Dennis Delaney  
K.R. Saline & Associates  
160 N. Pasadena, Suite 101  
Mesa AZ 85201-6764

Mr. John Branch  
Power Operations Director  
City of Mesa  
PO Box 1466  
Mesa AZ 85211-1466

Mr. Tom Parry  
City Manager  
City of Needles  
817 Third Street  
Needles CA 92363-2933

Mr. Kent Bloomfield  
Vice President  
Overton Power District  
PO Box 395  
Overton NV 89040

**Mr. Dan Pellouchoud**  
Manager, Hydro Generation  
Salt River Project  
Mail Stop EVS113  
PO Box 52025  
Phoenix AZ 85072-2025

**Mr. Terry Hinton**  
Town Manager  
Town of Thatcher  
PO Box 670  
Thatcher AZ 85552

**Mr. D. Loran Nixon**  
Electric Operations Manager  
Tohono O'Odham Utility Authority  
PO Box 816  
Sells AZ 85634-0816

**Mr. Cory Prochaska**  
Superintendent of Electrical Systems  
Wellton-Mohawk Irrigation and Drainage District  
30570 Wellton-Mohawk Drive  
Wellton AZ 85356

**Mr. Dean Criscola**  
Financial Manager  
Desert Southwest Region  
Western Area Power Administration  
PO Box 6457  
Phoenix AZ 85005-6457

**Mr. Jack Murray**  
Desert Southwest Region  
Western Area Power Administration  
PO Box 6457  
Phoenix AZ 85005-6457

**Mr. Don R. Pope, P.E.**  
Manager  
Yuma County Water Users' Association  
PO Box 5775  
Yuma AZ 85366-5775

**Mr. James V. Trangsrud**  
Forward Trading & Marketing POB007  
Salt River Project  
PO Box 52025  
Phoenix AZ 85072-2025

**Mr. Charles W. Weise**  
General Manager  
Tohono O'Odham Utility Authority  
PO Box 816  
Sells AZ 85634-0816

**Mr. Clyde L. Gould**  
General Manager  
Wellton-Mohawk Irrigation and Drainage District  
30570 Wellton-Mohawk Drive  
Wellton AZ 85356

**Mr. Anthony Montoya**  
Assistant Regional Manager for Power Marketing  
Desert Southwest Region  
Western Area Power Administration  
PO Box 6457  
Phoenix AZ 85005-6457

**Mr. John Council**  
Desert Southwest Region  
Western Area Power Administration  
PO Box 6457  
Phoenix AZ 85005-6457

**Mr. Tom Candelaria**  
Finance Director  
Town of Wickenburg  
155 N. Tegner, Suite A  
Wickenburg AZ 85390

**Mr. Jim Davey**  
Yuma County Water Users' Association  
PO Box 5775  
Yuma AZ 85366

Mr. Mark Smith  
President  
Yuma Irrigation District  
9510 Avenue 7E  
Yuma AZ 85365

Mr. James Rhodes  
Manager  
Yuma-Mesa Irrigation and Drainage District  
14329 S. 4<sup>th</sup> Ave Ext  
Yuma AZ 85365

Mr. Richard L. Darnall  
Consultant  
15811 N. 9<sup>th</sup> Avenue  
Phoenix AZ 85023

Ms. Richarda Maes  
Contracting Officer  
99 CONS/LGCV  
5865 SWAAB Boulevard  
Nellis AFB NV 89191

Mr. Rex C. Green  
Manager  
Yuma Irrigation District  
9510 Avenue 7E  
Yuma AZ 85365

Mr. John Tschigg  
Yuma-Mesa Irrigation and Drainage District  
14329 S. 4<sup>th</sup> Ave Ext  
Yuma AZ 85365

Mr. Al Zero  
Contracting Officer  
56 CONS/LGLV  
14100 West Eagle Street  
Luke AFB AZ 85309