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May 31, 2016

Ms. Lynn C. Jeka, Senior Vice President
CRSP Manager
Western Area Power Administration
Salt Lake City, UT 84111
Submitted Electronically to SLIPPost2024@wapa.gov

Re: POST 2024 Marketing Plan Comments of Ak-Chin Indian Community and Ak-Chin Energy Services (ACES)

Dear Ms. Jeka:

We serve as General Counsel to the Ak-Chin Indian Community (Ak-Chin or Community), a federally recognized Indian tribe organized pursuant to the Indian Reorganization Act of 1934, and the Community's utility entity, Ak-Chin Energy Services (ACES). We offer these comments to the Post 2024 Marketing Plan on behalf of the Community and its utility entity, ACES.

As a member of the Arizona Tribal Energy Association (ATEA), Ak-Chin supports in their entirety the comments filed on behalf of the Association by Amy Mignella.

In particular, Ak-Chin is especially concerned with the following points:

TERM: Ak-Chin and ACES support a contract term of twenty (20) years, with an automatic right to renew for an additional twenty years without consideration of resource reduction, if hydrology allows.

CONTRACTING PROCESS: Ak-Chin and ACES support a contract renewal process that follows standardized formal Western process when dealing as federal trustee with federally recognized Indian tribes. This should include publication of draft contract documents with specific and reasonable deadlines for responses. If customer meetings for input with additional agency discussions are required, such meetings should be limited and follow a standardized procedure.

CREDITWORTHINESS: Ak-Chin and ACES do not support inclusion of unjustified creditworthiness procedures in the draft contracts. The history of Ak-Chin's prior dealings with CRSP does not support the need for such procedures. Such procedures have already been deleted from draft contracts for Hoover D power now in the process of finalization.

Contract Renewal At Current Contract Amounts: Ak-Chin and ACES support Western's proposal to renew existing contracts at the same level and without reduction.

The Community and ACES thank you in advance for your consideration of these comments.

Sincerely,

STRICKLAND & STRICKLAND, P.C.



Robert F. Palmquist