



CREDA

Colorado River Energy Distributors Association

May 31, 2016

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

Intermountain Rural Electric Association

Platte River Power Authority

Tri-State Generation & Transmission Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric Association, Inc.

NEVADA

Colorado River Commission of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

City of Truth or Consequences

UTAH

City of Provo

City of St. George

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

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Mr. Adam Arellano
WAPA CRSP Management Center

Email: SLIPPost2024@wapa.gov

RE: SLCA/IP General Power Marketing Criteria (Proposed 2025 Marketing Plan); 2025 SLCA/IP Marketable Resource

Dear Ms. Jeka and Mr. Arellano:

The Colorado River Energy Distributors Association (CREDA) offers the following comments and questions regarding the above Proposed 2025 Marketing Plan ("Marketing Plan") as described in the referenced Federal Register Notices dated December 16, 2015 (80 FR 78222) and March 28, 2016 (81 FR 17163), as well as the cover letter and linked materials distributed and posted on WAPA's website May 10, 2016.

Included are: A) comments and recommendations on the Marketable Resource and Methods Report; B) a copy of CREDA's comments offered at the February 17, 2016 Comment Forum (starting at page 2); and C) technical corrections to the December 16, 2015 FRN recommended for inclusion in the Final Marketing Plan, as indicated at the Comment Forum.

CREDA appreciates WAPA providing the Methods Report and the Potential Marketable Resource information, and CREDA has considered those materials in developing these comments and recommendations.

A. GENERAL COMMENTS/RECOMMENDATIONS

- I. CREDA agrees with WAPA's conclusion that there is insufficient SLCA/IP resource to offer a New Customer Resource Pool.
- II. CREDA recommends WAPA extend current contract commitments through a 40-year extension of the existing Firm Electric Service Contracts ("Contracts") with as few changes as possible from the existing Contract. CREDA believes this can be achieved by the end of the current Fiscal Year.
- III. CREDA considered and does not support the proposed concept of a reevaluation or "reopener" at a 20-year interval during the term of the extended Contracts for the following reasons, among others:
 - a. The current Contracts provide WAPA sufficient flexibility to revise commitment levels upon five (5) years' written notice to the customer; the CRC, WRP and CDP tools also provide flexibility to Western and its customers. Likewise, the customers have sufficient flexibility to address resource needs that will vary with hydrology.
 - b. CREDA believes there is sufficient uncertainty contained in the modeling results as described in the Methods Report that it is likely the results may be overly conservative.
 - c. Historical collaboration through provisions of the 1992 Letter Agreement as supplemented, along with the demonstrated capability of WAPA and

