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Ms. Lynn Jeka
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:

Deseret Generation & Transmission (Deseret) on behalf of the member cooperatives (Moon lake Electric, Garkane Energy, Dixie Power, Flowell Electric, Bridger Valley Electric, & Mt. Wheeler Power) appreciates the opportunity to comment on Western's Federal Register Notice on the Salt Lake Integrated Projects 2025 General Marketing Criteria and provided the following for Western's review and consideration.

- Deseret supports making as few changes as possible from the existing contracts
- Deseret supports the proposed 40-year contract term.
- Deseret supports the current Marketing Area(s), sustaining both the Northern and Southern Divisions of Western.
- Deseret supports the definition of the established Winter Season (October – March) and Summer Season (April- September).
- Deseret supports Western having the right to adjust the Contract Rate of Delivery (CROD) and associated energy on a five (5) years written notice. Deseret would strongly recommend that Western collaborate with its preference customers prior to the providing the written notice, to attempt to provide an alternative method or solution, other than reducing the CROD. Should an increase in resource occur, we would recommend that the additional resource be allocated pro-rata to existing customers in the same manner as the afore mentioned CROD decrease.

- Deseret supports the extension of the existing Customers current CROD allocations for the contract term; with any necessary adjustments to the Customers CROD be administered in the manner as described above.
- Deseret supports the continuation of Customer Dispatch Power and Western Customer Replacement Power at the Customer's option.
- Deseret supports Western's sale of unused firm transmission on a non-firm basis when that capacity is not used for Customer's allocations or Customer's CDP/WRP use. Deseret further believes that income derived from non-firm transmission sales should applied as a reduction in the composite rate collected from the CRSP Customer's.
- Deseret supports the continuation of the use of the current GPCP, September 1, 2007, within the contract.
- Deseret continues to believe that current CRSP Customer's should not have to re-submit their respective profile data. This exercise should be reserved for New Customers, if it is determined that a New Resource Pool will be established.
- Deseret recommends CRSP include in its final Federal Register Notice, of the Post 2025 Marketing Plan, detailed information pertaining to its creditworthiness procedures. Deseret also suggests that the process and policies remain consistent in their application to all Customers throughout the various regions and associations/administrations.
- Deseret recommends that CRSP provide to CRSP Customer's, CRSP hydropower generated Renewable Energy Credits (REC's) in a manner consistent with that of Western's Loveland Area Projects REC program.

Thank you again for the opportunity for Deseret on behalf of its Coop members to provide these written comments regarding the proposed 2025 General Power Marketing Criteria which were published in the Federal Register on December 16, 2015.

and Western's decision on whether a new resource pool is justified or

Should you have questions would like to discuss in more detail, please contact myself at 1-801-619-6560.

Sincerely,

A handwritten signature in black ink, appearing to be "P. Solomon", with a long horizontal line extending to the right.

Phillip Solomon P.E.
AVP/Chief Engineer