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Resource Transmission Management LLC
 4140 Clover Lane
 Holladay, Utah 84124
 801 277 1488

April 30, 2016

Mr. Parker Wicks
 Public Utilities Specialist

Re: The SLCA –IP Comment Forum

Sir:

We are submitting this letter relative to the referent Comment Forum on behalf of the Weber Basin Water Conservancy District.

We have reviewed Western’s proposed allocation of capacity and energy for the District in the post 2024 period and find that it has a load factor of about 10.4 %.whereas the system-wide load factor for all SLCA-IP customers for the summer season – post 2024 is about 41.5% or around 4 times what the District could expect.

We suspect that at least part of the reason for this inequity rests in an earlier allocation process which Western (or perhaps Reclamation) accomplished based upon then existing CROD’s. Western adjusted the District’s allocation after the regular allocation was completed since the District was far exceeding its CROD during a period of surplus CRSP power and using its CROD as a basis for allocation was not equitable in this case. For this and other reasons we find the District disadvantaged in the overall scheme of things relative to other customers and respectfully request Western to provide the District with an equitable increase in the amount of energy allocated – post 2024 to place it on a similar footing as the overall group of customers. We request this adjustment on the basis of equity – since we would rather not be grouped with “all of the customers wanting all of the power”.

As the District is a pumping operation, a load factor of +/- 10% is far below its system needs and significantly raises its average cost of SLCA-IP energy. The allocation of an additional amount of energy would equitably correct this historical inequity, greatly lower its average energy cost, facilitate its ability to better use its allocation of Western’s capacity and put it on a par with other customers.

We hope you will view this comment/request in a favorable light and provide the District with an equitable adjustment in the post 2024 allocation process. Inasmuch as we are looking at a 40 year period this correction would be an enormous improvement in its situation.

The District values its relationship with Western and acknowledges and appreciates that you have been excellent in working with it to add value to its own generation, and in several other important ways. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard D. Lucy". The signature is fluid and cursive, with the first name being the most prominent.

Richard D. Lucy

CC Mr. Mark Anderson

Mr. Tage Flint

Mr. Adam Arelliano