



Platte River Power Authority



Sent Via Email

May 27, 2016

Ms. Lynn Jeka
CRSP Manager
Western Area Power Administration
150 East Social Hall Avenue, Suite 300
Salt Lake City, UT 84111-1580
Email: SLIPPost2024@wapa.gov

Re: Proposed 2025 Marketing Plan – Salt Lake City Area Integrated Projects

Dear Ms. Jeka:

Platte River Power Authority (Platte River) appreciates the opportunity to comment on Western Area Power Administration's (WAPA) 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 dated and posted on WAPA's website on May 10, 2016, which include the "Methodology for SLCA/IP Resource Analysis for Consideration in the Development of the 2025 Marketing Plan" and "Analysis of Potential Marketable Resource Post 2024 Marketing". Platte River provides the following comments for WAPA's review and consideration.

- While Platte River generally supports most of the elements of the Criteria, we support making as few changes as possible to the existing contract.
- Platte River supports WAPA's recommendation in its letter dated May 10, 2016 that there be no New Customer Power Pool, especially since WAPA's modeling indicates the potential for less Sustainable Hydro Power (SHP) energy resources being available in the future to maintain energy allocations at their current level.
- Platte River supports a 40 year contract term.
- Platte River understands from WAPA's letter dated May 10, 2016 that additional SHP energy may be available in the Summer Season (April – September), while less energy may be available in the Winter Season (October – March). Platte River has commented in the past that it is now a summer peaking utility and that it is generally supportive of additional energy being available in the Summer Season, provided that the associated reductions in Winter Season energy are reasonable. Platte River supports the flexibility to determine monthly energy patterns, within its seasonal allocation, as described in WAPA's Methodology for SLCA/IP Resource Analysis. Platte River recommends WAPA work with CREDA and its What-If Committee in developing a process to accomplish this.
- Platte River supports the retention of the existing Western Replacement Power and Customer Displacement Power programs. These programs were developed through a collaborative effort between WAPA and CRSP customers and are considered a "win-win" situation for all as well as providing flexibility for the customers and WAPA to address hydrologic and market issues.



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- Platte River supports continuing the use of the current GPCP, dated September 1, 2007, with the contract.
- Platte River supports the sale of unused firm transmission on a non-firm basis when capacity is not used for the delivery of Customer allocations or Customer CDP/WRP use. Income from the non-firm transmission sales should reduce the composite rate collected from the CRSP customers.
- Platte River does not support the need for existing CRSP customers to resubmit their profile data.
- Since WAPA has the ability to change Firm Electric Service (FES) Customers contractual commitments with a five (5) year notice, we disagree with WAPA's proposal to reevaluate contracts after 20 years.
- Platte River understands that WAPA incorporated the "hybrid alternative" as described in the LTEMP Draft EIS in its hydrology modeling in the 2025 Marketing Plan. Though the hybrid alternative has been selected as the preferred alternative in the LTEMP Draft EIS, no record of decision (ROD) has been entered in the LTEMP NEPA process. Platte River encourages WAPA to revisit the inclusion of the hybrid alternative in the hydrology modeling in the event another alternative is selected in the LTEMP ROD. Additionally, the hybrid alternative includes numerous flows experiments, none of which were modeled as part of the 2025 Marketing Plan. Platte River recommends WAPA provide additional information about how the various experiments proposed in the hybrid alternative could affect the 2025 Marketing Plan.
- Platte River recommends that CRSP include in its final FRN information regarding its creditworthiness procedures. Platte River also recommends that such procedures be consistently applied to all Customers across all regions.
- Lastly, with the conclusion that there will be no new resource pool, we believe that the Marketing Plan schedule can be compressed.

Thank you again for the opportunity to provide written comments regarding the proposed 2025 General Power Marketing Criteria which was published in the Federal Register on December 16, 2015. We appreciate your review and consideration of these comments. Should you have any questions or would like to discuss this in further detail, please contact Carol Ballantine at (970) 229-5315.

Sincerely,

Jason Frisbie
Chief Operating Officer