

Submitted Electronically to [SLIPPost2024@wapa.gov](mailto:SLIPPost2024@wapa.gov)

May 30, 2016

Lynn C. Jeka  
Senior Vice President  
CRSP Manager  
Western Area Power Administration  
Salt Lake City, UT 84111

**RE: Post 2024 Marketing Plan Comments of the White Mountain Apache Tribe**

Dear Ms. Jeka:

Please accept these comments on behalf of the White Mountain Apache Tribe (“Tribe”). The Tribe submits the following responses to the Post 2024 Marketing Plan as currently proposed.

1. Term  
The Tribe supports a 20-year contract term with an automatic right of renewal for an additional 20 years without resource reduction considerations if hydrology allows.
2. Process  
Customer meetings should be limited and follow a formal process that includes notice and comment periods of reasonable duration, with additional agency/customer/applicant dialogue on an individualized basis unless such topics advance to affect broader customer interests.
3. Creditworthiness  
The Tribe does not support the inclusion of creditworthiness provisions in the renewal contracts. Tribal customers have already proven their reliable payment of the contract obligations for the duration of the existing contracts. Furthermore, creditworthiness has been excluded from the BCP contract forms now in process of execution and no distinct basis exists on which Western can justify the insertion of creditworthiness terms into the CRSP renewal language.
4. Pool Reduction  
The Tribe does not support an overall reduction in the contracted customer shares, especially in the absence of any proposed approach to mitigating that adjustment as noted by Western.
5. LTEMP EIS  
The Tribe notes Western’s reliance on a specific Department of Interior proposed EIS scheme in Western’s resource analysis but urges Western to avoid reliance on any specific environmental mitigation proposal in advance of any final Department of Interior decision on that matter. The Tribe instead supports Western proposing a variety of Marketing Plan approaches that address differing EIS outlines as those effect hydroelectric power production. The Tribe supports Western’s use of additional customer dialogue, planning time and further customer comment

opportunity as Western has offered in order to better strategize in relation to EIS-driven Dam management proposals.

6. New Customers

The Tribe supports creation of a pool for new tribal customers not already receiving power if power is available without reduction to existing customers. The Tribe only supports power availability to new non-tribal customers after such supplemental power is made available to currently non-participating tribes within the project service area but supports prioritization of new tribal customers as any supplemental resource is available.

Thank you for your attention to this submission.

Amy T. Mignella  
Special Counsel  
White Mountain Apache Tribe