



CREDA
Colorado River Energy Distributors Association

July 10, 2020

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

Holy Cross Energy

Intermountain Rural Electric Association

Platte River Power Authority

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

Yampa Valley Electric
Association, Inc.

NEBRASKA

Municipal Energy Agency of Nebraska
(also Colorado)

NEVADA

Colorado River Commission
of Nevada

Silver State Power Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

Tri-State Generation & Transmission
Cooperative

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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Western Area Power Administration
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Via Email: johnsons@wapa.gov; CRSPMC-RATE-ADJ@WAPA.GOV

Dear Mr. Johnson:

Following are comments on the Re-Opening of Comment Period for Proposed Salt Lake City Area Integrated Projects Firm Power Rate and CRSP Transmission and Ancillary Services Rates (Rate Order No. WAPA-190) (85 FRN No. 124, June 26, 2020), submitted by the Colorado River Energy Distributors Association (CREDA).

CREDA appreciates the opportunity we have had to work with WAPA throughout the WAPA-190 rate process, particularly WAPA's online posting of rate information, supporting documentation, and responses to questions and comments throughout the process.

To ensure CREDA comments are reconsidered as part of this FRN's (April 20, 2020-July 10, 2020) comment period, CREDA requests that CREDA's April 20, 2020 submittal be incorporated herein by reference. In addition to those comments, CREDA offers the following:

- I. Cost Recovery Charge (CRC) Revisions: CREDA appreciates the customer webex presentations during June, which provided additional information and responses to customer questions and comments on the CRC. As issues such as hydrology, environmental program funding, and purchased power all have potential impacts to the triggering and implementation of a CRC, CREDA encourages ongoing discussion on the various elements of the CRC, including triggering criteria, as well as changes proposed to the CRC in this rate case.
- II. Work Program Review: CREDA appreciates WAPA's decision to incorporate the FY2021 work program materials into this rate case. As review of the FY2022 work program materials proceeds pursuant to Letter Agreement No. 92-SLC-0208 and Agreement No. 96-SLC-0315, and following CREDA's review of final WAPA-190 Rate Brochure and supporting documentation, CREDA may have additional questions or comments regarding the treatment of m&I revenues in the Power Repayment Study. CREDA looks forward to ongoing discussion with WAPA on this or other issues.

Please do not hesitate to contact me with any questions.

Leslie James
Leslie James
Executive Director

Cc: CREDA Board

Submitted via email to: CRSPMC-RATE-ADJ@wapa.gov

July 10, 2020
Supplemental CRSP Rate Proposal Comments
of the Arizona Tribal Energy Association

The Arizona Tribal Energy Association (ATEA) provides the following comments on the CRSP rate proposal, as originally published on January 21, 2020, and modified and made available for additional customer review on June 30, 2020:

	(Current, FY 17)	(FRN, '21 Workplan)	(MOA 2, '21 Workplan)
Composite Rate	29.42	29.37	27.46
Energy Rate	12.19	12.29	11.43
Capacity Rate		62.66	58.24
Capacity Rate Billed	5.18	5.22	4.85
Project Use Rate		12.29	11.43

ATEA supports the adoption of the “MOA 2” rate as made available for customer review on June 30, 2020. ATEA supports the revision of the rate proposed on January 21, 2020 as structured to reduce the relevant apportionment total by \$323 million and extend the “pinch point” to 2038. ATEA agrees that this rate formulary best ensures that WAPA imposes only the minimum cost to CRSP customers, consistent with WAPA’s obligations.