

Kaibab Band of Paiute Indians



September 16, 2014

Mr. Ronald E. Moulton
Acting Regional Manager
Western Area Power Administration Desert SW Office
P.O. Box 6457
Phoenix, AZ 85005-6457

Dear Mr. Moulton:

Please accept these comments on the Post2017-BCP Marketing process on behalf of the Kaibab-Paiute Tribe. We are writing in response to both the allocations proposed by Western in the Federal Register on August 8, 2014 and the comments made by Western representatives at the public comment forums held by Western the week of August 25, 2014.

My tribe wishes to convey its support for tribal allocations as proposed and also note its support for a final allocation scheme that vests allocations of at least some quantity over the minimum 100kW to every tribal applicant. As Western representatives stressed the "proposed" nature of the published allocations during the August public comment forums while also noting that those totals listed will be adjusted before finalizing, we understand that some risk exists to those identified as recipients. While the Kaibab Paiute Tribe acknowledges Western's requirement of substantiating data and fully intends to comply with the same as its providing utility make possible, it sees no other basis on which its proposed allocation should be reduced or otherwise withdrawn. As this reference was only vaguely made by Western at the August Tempe meeting, it is unable to understand what other modifying basis Western envisions and accordingly the Tribe cannot respond further in that regard.

Finally, the Tribe notes that tribal allocations are consistent with Western's obligations as resource administrator and Federal trustee to tribal interests, and even avoid any conjectured burden on non-tribal customers, as Western proposes that California recipients receive an almost proximate load-based share of the resource (20.8%), despite the absence of historical or trust considerations.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Manuel Savala', written over a horizontal line.

Chairman Manuel Savala
Kaibab Band of Paiute Indians

Tribal Affairs

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