



SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
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September 18, 2014

Mr. Ronald E. Moulton
Acting Regional Manager
Desert Southwest Customer Service Region
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

Re: Support for the Post-2017 Boulder Canyon Project Proposed Allocation to the Imperial Irrigation District and City of Cerritos

Thank you for the opportunity to provide comments on the Western Area Power Administration's proposed Boulder Canyon Project Post-2017 Resource Pool Proposed Allocation of Power developed under the Conformed Power Marketing Criteria or Regulations. The Southern California Public Power Authority (SCPPA) strongly supports Western's proposed allocation, as published in the August 8, 2014 Federal Register, to the Imperial Irrigation District and to the City of Cerritos.

SCPPA is a joint powers authority consisting of 11 municipal utilities and one irrigation district. SCPPA Members deliver electricity to approximately two million customers over a 7,000 square mile area across Southern California, with a total population of 4.8 million people. SCPPA Members include the municipal utilities of the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District.

SCPPA was heavily involved towards enactment of the Hoover Power Allocation Act of 2011. This included support for a new resource pool (known as "Schedule D") to be allocated to new allottees, such as the Imperial Irrigation District and City of Cerritos, as proposed by existing Boulder Canyon allottees from the states of Arizona, California, and Nevada. All SCPPA Members would be post-2017 Boulder Canyon allottees if Western's Boulder Canyon Project Proposed Allocation is finalized as noticed.

Additional hydropower resources will help SCPPA Members further reduce greenhouse gas emissions to meet California's 2006 Global Warming Solutions Act (AB 32). That bill directed California's Air Resources Board to, among other things, reduce GHG emissions to 1990 levels by 2020. A secondary goal is to reduce emissions 80% below 1990 levels by 2050. In late 2006, SB 1368 was enacted which established a GHG emission performance standard prohibiting local publicly owned electric utilities from further investing in all existing and new long-term baseload generation resources that exceed 1,100 lbs/MWh. SCPPA Members have made major strides to address global warming directly affecting SCPPA ratepayers while also working diligently to implement a wide range of mandatory programs to meet California's ambitious 33% by the end of 2020 Renewables Portfolio Standard goal. Additional Hoover Dam hydropower would be a welcomed addition to the greater SCPPA Members' energy resource portfolio.

SCPPA appreciates the opportunity to provide these comments. Thank you for your time and consideration.

Respectfully submitted,

Bill Carnahan
Executive Director

Cc: Mr. Carl Stills, Imperial Irrigation District
Mr. Vince Brar, City of Cerritos