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Sent via email to: Post2017BCP@wapa.gov

September 19, 2014

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

RE: Public Comments of the White Mountain Apache Tribe

Dear Mr. Moulton:

Please accept these comments on the Post2017-BCP Marketing process on behalf of the White Mountain Apache Tribe (Tribe). The Tribe is writing in response to the allocations proposed by Western in the Federal Register on August 8, 2014, the comments made by Western representatives at the public comment forums held by Western the week of August 25, 2014 and also comments made by other process participants.

While the Tribe conveys its support for tribal allocations of Hoover power generally, it specifically supports a final allocation scheme that reallocates the available power such that all tribes with other Federal power resources receive at least a portion of the Hoover resource. The Tribe understands that Western intends to adjust the resource distribution from what is proposed, as Western representatives stressed this during the August public comment forums, accordingly allowing Western to encompass tribes more broadly before final allocations are made.

Western's application of its published allocation criteria in this process need not penalize any tribes, as Western's own wording does not, by itself, preclude allocations to specific tribal applicants. Instead, the wording as written allows for tribes to now receive Boulder Canyon power without a total preclusion based on the receipt of other Federal resources if the 25% cap is applied differently. Such a revision to Western's proposed allocations is consistent with Western's obligations as resource administrator and Federal trustee to tribal interests and also avoids an overall process delay or disparate burden on non-tribal customers, as Western proposes that California recipients receive an almost proximate share of the resource (20.8%) despite the absence of any specialized considerations.

The Tribe hopes Western will finalize allocations in accordance with these comments.

Sincerely,

Amy T. Mignella, Esq.
White Mountain Apache Special Counsel