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Sandee Peebles
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Drive
Folsom, CA 95360

SUBJECT: 2025 Power Marketing Program

Sandee:

The following are CPPA's comments on Western's 2025 Power Marketing Plan (PMP). Western indicated during the April 22, 2015, informal stakeholder meeting that major changes from the 2004 PMP are not expected in the 2025 PMP. We support many of the First Preference provisions in the 2004 PMP and are hopeful that Western will incorporate these provisions into the 2025 PMP. These provisions are described as follows:

Maximum Entitlement of First Preference Customers

We support Western's calculation of the entitlements upon a 20-year average of historical generation, recalculation of this amount every 5 years, and adjustments if a 10 percent threshold is met.

Full Requirements vs. Percentage Option

We prefer to continue to receive full requirements and do not think the percentage option is necessary to be included in the 2025 PMP.

Sharing of New Melones Entitlement

We support the provision that the entitlement is shared on an equal one-half basis among Calaveras and Tuolumne counties. We also support the provisions that allow one county to use the unused portion of the other county's entitlement upon an interim basis with a six-month withdrawal provision.

New Preference Customers – New Melones Project

Western's PowerPoint slide regarding the application dates for new customers may be in error. We believe that applications for power beginning October 5, 2022, need to be received 18 months in advance of that date or by April 5, 2020.

New CPPA Customers

CPPA is a joint powers agency created under the laws of California for the primary purpose of securing and delivering New Melones entitlement power to its members. Membership in CPPA is open to Federal, State, regional and local public agencies (which are all Preference Customers as defined by Reclamation Law).

Western has the responsibility and obligation to provide power to CPPA to serve all these customers under the provisions of the Flood Control Act of 1962 (76 Stat. 1180). Unfortunately, Western has taken the unsupported position to not serve certain members of CPPA. Western rejected CPPA's request for service to the Northern California Power Agency's (NCPA) loads within Calaveras County indicating it would circumvent the allocation process under the 2004 PMP since NCPA already has its own base resource allocation (1). However, Western later stated that it is willing to serve Federal and State members of CPPA even though some of these entities also have base resource allocations similar to NCPA (2). Western is entirely inconsistent in the way it administers the 2004 PMP. The 2025 PMP needs to clearly address the rights of CPPA and its members to receive power under the New Melones Entitlement. Western should reconsider its position now so this issue can be resolved in a timely manner and not 10 years from today.

Sincerely,



Dennis Dickman
CPPA General Manager

- (1) July 30, 2013, Western letter to CPPA from Sonja A. Anderson, Power Marketing Manager
- (2) October 10, 2013, Western letter to CPPA from Sonja A. Anderson, Power Marketing Manager