



Roseville Electric Utility
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Reliable Energy. Dependable Service.

**COMMENTS OF
THE CITY OF ROSEVILLE, CALIFORNIA
ON THE PROPOSED CENTRAL VALLEY PROJECT
2025 POWER MARKETING PLAN**
(MAY 6, 2016 FEDERAL REGISTER, PP 27433-27439)
August 4, 2016

Roseville Electric Utility appreciates the opportunity to provide comments in support of the Western Area Power Administration's (WAPA) proposed 2025 Power Marketing Plan for the Central Valley Project (CVP).

I. Background

A Publicly Owned Utility established in 1912, Roseville Electric Utility is located in Northern California and serves over 58,000 customers, with an annual electricity load of over 1.2 million MWh. Roseville Electric Utility began receiving CVP power in 1956 and has a number of active agreements with WAPA including Base Resource Agreement, Interconnections Agreement, Interconnected Operations Agreement, Network Integrated Transmission Services agreement, and Displacement of Base Resource Agreement. Roseville Electric Utility currently purchases 4.85333% of Base Resource product marketed by WAPA from CVP resources.

II. Discussion

Roseville Electric Utility supports WAPA's Proposed 2025 Power Marketing Plan proposal, which includes a 30 year term effective January 1, 2025 through December 31, 2054, and extends existing agreements with 98% of current customer Base Resource allocations. Roseville Electric Utility understands WAPA's need to make Base Resource allocations available for Resource Pools and supports the proposed methodology in Section IV.A as an equitable solution for all customers.

Roseville Electric Utility supports WAPA's proposal in Section III to continue to offer Custom Products and Services. However, Roseville Electric Utility encourages WAPA to identify the Custom Products being offered to customers, including the product terms and cost.

Roseville Electric Utility supports the provision in Section VIII regarding future changes in the electric utility industry. The industry, especially in California, has been undergoing a period of dynamic change. Resources installed to meet the environmental targets have changed the shape of net electricity consumption patterns and increased intermittency. Roseville Electric Utility appreciates Western's acknowledgement that the Base Resource product, as currently marketed in the proposed plan, may need to adapt to this environment. Also, Roseville Electric Utility agrees that any changes to the product structure should be the result of mutual agreement.

Roseville Electric Utility's overall support of the proposed plan should not mute the ongoing concerns about the economic value of the Base Resource product and associated Restoration Fund obligations. Roseville Electric Utility encourages WAPA to continue proactively addressing these issues with the Bureau of Reclamation and other concerned customers to ensure that the Base Resource product is economically viable.

III. Conclusion

Roseville Electric Utility appreciates the opportunity to provide comments, and looks forward to working with WAPA in the 2025 Plan process.

Respectfully submitted,



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Electric Utility Director
Roseville Electric Utility