

July 1, 2008

Ms. Sonja A. Anderson
Power Marketing Manager
Sierra Nevada Region
Western Area Power Administration
114 Parkshore Drive
Folsom, CA 95630-4710

RE: Proposed 2015 Resource Pool Size and Revised Eligibility Criteria

The Presidio Trust (Trust) is a federal agency created by Congress in 1996 and is part of the Executive Branch of the federal government. The Trust's mission is to preserve and enhance the Presidio of San Francisco as an enduring resource for the American Public. In addition to the more than 1,400 historic and non-historic buildings, natural resource areas, and public spaces under the Trust's jurisdiction, the Trust owns and operates many of the utility systems serving the Presidio, including the electrical distribution system.

The Trust supports the process identified in Western Area Power Authority's (Western) 2004 Marketing Plan and Federal Register notice (73 FR 24952) to establish the size and eligibility criteria for the 2015 Resource Pool. Once established, Western would allocate the 2015 Resource Pool to new and existing customers through a separate application process. As indicated in the Federal Register notice, Western is seeking public comments on the method used to establish the size of the 2015 Resource Pool and a proposed modification to eligibility criteria. The Trust provides the following comments on these issues.

2015 Resource Pool Size

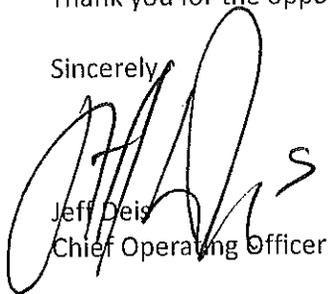
Western is proposing to reduce all its customers' Base Resource percentage by 2 percent to establish the 2015 Resource Pool. The 2004 Marketing Plan gives Western the authority to reduce all customers' allocation by up to 2 percent to provide for the 2015 Resource Pool. As Western's proposed reduction is the maximum provided for in the 2004 Market Plan, the Trust supports Western's proposed action on this issue.

Revised Eligibility Criteria

Western is proposing to eliminate one of the provisions of the eligibility criteria established in the 2004 Marketing Plan. The provision under consideration for elimination limits the ability of large, existing customers to apply for a resource pool allocation. Under the provision, existing customers may apply for a resource pool allocation if their extension CRD is not more than 15 percent of their peak load in the calendar year prior to the Call for Applications, and not more than 10 megawatts. Elimination of this provision from the eligibility criteria would favor existing, large Western customers over smaller entities wishing to receive an allocation from the 2015 Resource Pool. As the Trust is not currently a Western customer but will be submitting an application for allocation of the 2015 Resource Pool, the Trust does not support the elimination of this provision. Keeping the existing criteria ensures that Western power is equitably allocated to a variety of customers, both big and small.

Thank you for the opportunity to provide input on these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Deis", is written over the typed name and title.

Jeff Deis
Chief Operating Officer

cc: Craig Middleton, Executive Director
Karen Cook, General Counsel
Andrea Andersen, Assistant General Counsel