



Department of Energy
Office of Science
Berkeley Site Office
Lawrence Berkeley National Laboratory
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Berkeley, California 94720

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

Subject: U.S. Department of Energy (DOE) Berkeley Site Office (BSO) Comments on 2015
Resource Pool

Dear Ms. Anderson:

Attached are DOE BSO's brief comments on Western's proposed size of and eligibility criteria for the 2015 Resource Pool that was published in the May 5, 2008 edition of the Federal Register. In summary, DOE BSO fully supports Western's proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Hemant Patel".

Hemant Patel
Electric Power Services Manager

**Western Area Power Administration
- Proposed 2015 Resource Pool**

**Comments of the
U.S. Department of Energy
Office of Science, Berkeley Site Office
July 7, 2008**

Background

The U.S. Department of Energy (DOE), Office of Science (SC), Berkeley Site Office (BSO) oversees the operation of the DOE Northern California Laboratory Power Purchasing Consortium, which consists of three DOE laboratories (Lawrence Berkeley National Laboratory, Lawrence Livermore National Laboratory, and the Stanford Linear Accelerator Center). These laboratories receive a combined allocation of Central Valley Project Base Resource of approximately 4.5 percent. As such, DOE BSO has a vital interest in the proposal by Western Area Power Administration (Western) regarding the amount of power to be made available in the 2015 Resource Pool and the change in the criteria to qualify for an allocation of that power that was set forth in the Federal Register on May 5, 2008. Following are DOE BSO's comments on those two issues in response to Western's requests for comments.

The Size of the 2015 Resource Pool

The Marketing Plan provides for Western to reduce all Customers' rights to purchase Base Resource by an additional 2 percent to create the 2015 Resource Pool. Western proposes to reduce each customer's allocation by the full 2 percent. While that reduction will significantly impact the DOE laboratories, DOE BSO supports Western's proposal in order to "promote wide-spread use of Federal Power." DOE BSO's support of the 2 percent across-the-board reduction is influenced by Western's proposal to delete one of the qualification criteria that restricted customers with Extension CRDs that made up more than 15 percent of the customer's peak load, or were more than 10 MW, from eligibility for an allocation from the 2015 Resource Pool.

Revised Eligibility Criteria

Western has proposed to delete one of the eligibility criteria for subscription to the 2015 Resource Pool, specifically, the criterion that 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 MW." Western gives two reasons for this proposed deletion. First, Western believes the criterion is too restrictive to ensure full subscription of its resources. Second, Western points out that the 2015 Resource Pool is based on a percentage of the Base Resource, and not the Extension CRD, which is no longer applicable. DOE BSO agrees with Western on both counts and supports the proposed deletion. DOE BSO further believes that the elimination of this criterion will serve to promote the wide-spread use of Federal Power which was the argument made to support the full 2 percent Base Resource Reduction for all existing customers.