



# Gila River Indian Community Utility Authority

Submitted electronically to [SLIPPost2024@wapa.gov](mailto:SLIPPost2024@wapa.gov)

May 31, 2016

Lynn C. Jeka  
Senior Vice President  
CRSP Manager  
Western Area Power Administration  
Salt Lake City, UT 84111  
[SLIPPost2024@wapa.gov](mailto:SLIPPost2024@wapa.gov)

**RE: Gila River Indian Community Utility Authority Comments to: Post 2024 Marketing Plan**

Dear Ms. Jeka:

This letter provides comments from the Gila River Indian Community Utility Authority (“GRICUA”) regarding the CRSP Post 2024 Marketing Plan. GRICUA submits the following:

**1. Term**

GRICUA supports a 20-year contract term with an automatic right of renewal for an additional 20 years without resource reduction considerations so long as hydrology supports this.

**2. Process**

Customer meetings should be limited and follow a formal process that includes notice and comment periods of reasonable duration, with additional agency/customer/applicant dialogue on an individualized basis unless such topics advance to affect broader customer interests.

**3. Creditworthiness**

GRICUA does not support the inclusion of creditworthiness provisions in the renewal contracts. GRICUA, along with other tribal customers, has already proven its reliable payment of the contract obligations for the duration of the existing contract. Furthermore,

creditworthiness provisions have been excluded from the BCP contract forms that are now in the process of being finalized. No distinct basis exists on which Western can justify the insertion of creditworthiness terms into the CRSP renewal language.

**4. Pool Reduction**

GRICUA does not support an overall reduction in the contracted customer shares, especially in the absence of any proposed approach to mitigating that adjustment as noted by Western. GRICUA seeks full renewal of its allocations at current levels.

**5. LTEMP EIS**

GRICUA notes Western's reliance on a specific Department of Interior proposed EIS scheme in Western's resource analysis but urges Western to avoid reliance on any specific environmental mitigation proposal in advance of any final Department of Interior decision on that matter. GRICUA instead supports Western proposing a variety of Marketing Plan approaches that address differing EIS outlines as those effect hydroelectric power production. GRICUA supports Western's use of additional customer dialogue, planning time and further customer comment opportunity as Western has offered in order to better strategize in relation to EIS-driven Dam management proposals.

**6. New Customers**

GRICUA supports creation of a pool for new tribal customers not already receiving power if power is available without reduction to GRICUA and other existing customers. GRICUA only supports power availability to new non-tribal customers after such supplemental power is made available to currently non-participating tribes within the project service area but supports prioritization of new tribal customers as any supplemental resource is available.

On behalf of GRICUA, I thank you for the opportunity to provide comments to the Post 2024 Marketing Plan. If you have any questions, please contact me at 520-796-1563.

Sincerely,



Leonard S. Gold  
General Manager  
Gila River Indian Community Utility Authority

cc: GRICUA Board of Directors  
Linda Sauer, Office General Counsel, GRIC  
Denten Robinson, Rothstein Law Firm