

ATEA requests the following language change in the JPA final draft, clarifying the records request reply in instances of non-release.

Section 19.1

In the event WAPA is not able to provide Materials requested by a Contractor, WAPA will *generally reference by category* the Materials not provided and the associated limitation(s). [Original wording was “generally describe”]

ATEA also requests that the JPA finalization/adoption and any MOU revision process be conducted separately. ATEA considers this critical to preserving its own resource expenditure prioritization on any further DSW administrative/customer-driven activities.

In addition, ATEA asks that any MOU effort first be considered for its particulars and its necessity at this time. It is not clear what of the MOU, after the time and funds expended in the JPA development process, now warrants any revision. Further, ATEA does not see the urgency or need for interconnection to the JPA so as to coordinate the two efforts. ATEA requests that DSW and/or the other customers specifically identify the reasons, including the issues to be resolved and the associated benefits, *before* embarking on any further meetings or dialogue beyond what has now spanned approximately two years for the JPA.

Finally, the ATEA member interests are committed to improving the efficiency of DSW processes as well as cost containment for their customers. In this way, ATEA cannot agree to added administrative expense that may not be warranted.

Thank you.