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COLORADO RIVER COMMISSION
OF NEVADA

September 19, 2014

Mr. Ronald E. Moulton
Acting Regional Manager
Desert Southwest Customer Service Region
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

E-mail: Post2017BCP@wapa.gov

SUBJECT: Comments regarding Western's Proposed Hoover Schedule D Allocations -
Federal Register Notice (79 FR 46432)

Dear Mr. Moulton:

The Colorado River Commission of Nevada (CRC) is an executive agency of the State of Nevada. The CRC is required by Nevada law to protect the interests of the State of Nevada in power generated on the Colorado River. The CRC respectfully submits these comments regarding Western's proposed allocations of Hoover Schedule D power that were published in the Federal Register Notice (FRN) on August 8, 2014.

The CRC has participated since 2008 in the legislative process that created the Hoover Power Allocation Act of 2011 (the HPAA) which authorized the process that Western is now pursuing, and we have participated in Western's proceedings regarding implementation of the HPAA since they began.

The CRC wishes to assist Western in concluding this process as quickly and properly as possible. However, our efforts to do so have been stymied by Western's uncharacteristic refusal to provide to participants essential information on the calculations, work papers and data that Western used to arrive at its proposed Schedule D allocations. Without this material it is impossible for the CRC to determine whether Western has properly applied the requirements of the HPAA and the Conformed Criteria. Western's repeated refusal to provide this information stands in the way of expeditious resolution of these issues.

The CRC has several serious concerns with how Western has conducted this process, which will be discussed more thoroughly below. These concerns include:

- Western has refused to provide public access to its calculations and work papers, which denies participants the opportunity to participate effectively in this proceeding.
- Western has denied allocations to eligible Nevada applicants by incorrectly calculating the current Hoover power benefit to Nevada Power Company's (NPC's) non-residential customers.
- Western has issued proposed allocations without verifying applicant loads, which must lead to significant questions regarding whether the allocations are valid.
- Western has denied allocations to eligible Nevada applicants by applying an extreme version of super-priorities for tribes which is not authorized by the HPAA.
- Western has denied allocations to eligible Nevada applicants by giving preference to cooperatives which is not authorized by the HPAA.
- Western should apply its criteria in a manner which ensures that Nevada's share of Hoover power is closer to the 1/3 authorized by the 1928 Act, not in a manner that exacerbates the disparity.
- Western has not yet taken the necessary steps to ensure that Nevada non-tribal applicants receiving allocations through its process, will contract for Schedule D power through the CRC.
- Western has not yet ensured that entities crossing state boundaries will pay their proportionate share of Hoover-related costs.
- Western has not yet re-issued its Hoover Conformed Criteria in a single integrated document, making it extremely difficult for applicants to understand its process.

I. Western should provide full access to its calculations, work papers and data to all participants in this proceeding.

The CRC has submitted verbal and written requests to Western for access to the calculations, work papers and data Western used to determine its proposed allocations in this proceeding. CRC made these requests in order to be able to carry out its own statutory duty to evaluate whether the allocations proposed by Western are proper and lawful. A copy of the CRC's written request to Western, and Western's rejection of this request, is attached to these comments as Exhibit 1. Inexplicably, Western has refused the CRC's requests.

The CRC strongly objects to Western's stonewalling. Western has no legitimate basis to assert confidentiality after-the-fact for information submitted by Applicants or materials created within Western. Participants need access to the requested information if they are to fully understand and evaluate Western's allocation process to assure its efficacy, accuracy, consistency with the HPA and the Conformed Criteria, and basic fairness.

Western claims that some of the information requested by the CRC is "proprietary". However, Western has failed to provide any basis for this claim. Generally, information submitted in public processes such as this allocation proceeding, is treated as public information UNLESS it is marked as confidential or proprietary by the entity submitting the information. Western should not assert confidentiality on behalf of an applicant that has not done so.

Western has told the CRC that the applicants "consider their information proprietary". However, Western does not claim that any applicant actually requested confidential treatment of its data, Western's applications do not contain an option for an applicant to request confidential treatment, and we know of no statements made in Western's presentations, or in the published FRN, or in the actual application, indicating that this information would be shielded from public disclosure. Western should not assert confidentiality on behalf of an applicant that has not done so.

And, if any load data or other information was clearly identified as proprietary or confidential by an Applicant before submittal to Western, and the same data or information was previously released into public data bases or systems or through annual financial reporting, it would be improper for Western to now assert that same data is confidential or proprietary. Finally, even if a category of information or data submitted to Western is protectable as confidential, the balance of the information or data submitted should be made public after redacting any truly confidential information.

As discussed above, Western's claims that the applicant data is proprietary are without merit. However, even if it was correct that applicant data is proprietary, this determination would provide no basis for refusing to disclose the calculation methodology, including excel formulas, Western used to determine which entities were chosen for an allocation, which entities were deemed to have not met the criteria, and how Western determined that the remaining 40,200 kW was to be distributed by targeting all applicants' peak load served by federal hydropower to less than 6.8%. Western has asserted no basis for refusing to publicly disclose this information, and the CRC urges that it be disclosed immediately.

The CRC requests again that Western maintain an open and public process that it should have been, and make this information public, so the CRC and other participants have the opportunity to exercise their legal rights to participate fully in this proceeding. The CRC requested an extension of the comment period to allow for further discussion, but this was denied by Western (Exhibit 2). Western has conducted open and public processes in the past and the CRC expects Western to continue this practice.

II. Western should recalculate allocations to Nevada applicants, utilizing the correct hydropower factor for applicants in Nevada Power Company's service territory.

For all Nevada applicants in Nevada Power Company's (NPC's) service territory, Western's allocation calculations utilized a 4.1% hydropower percentage factor, which assumes that all Nevada applicants in NPC's service territory receive a 4.1% hydropower benefit today. This assumption is clearly incorrect for applicants in NPC's service territory, which are most of the Nevada applicants. Under Nevada state law, the total benefit of Schedule B Hoover hydropower is assigned to residential customers only. NPC's non-residential customers today receive NO benefit of Hoover Schedule B hydropower. Hoover Schedule A hydropower is assigned to all NPC customer classes, so only a portion of Schedule A benefits non-residential customers. In other words, ALL of the Schedule D applicants in NPC's service territory are non-residential customers who do not receive any Schedule B benefit and only a portion of the Schedule A benefit today. Therefore, it would be fundamentally unfair to assume for purposes of Western's calculation that these customers receive all Schedules A and B benefit when they receive only a part of Schedule A and are precluded from Schedule B benefit under state law.

The correct hydropower factor for Nevada Schedule D applicants in NPC's service territory is 1.7%, not 4.1%. We are attaching information from NPC and the calculations that support this conclusion as Exhibit 3.

Western has also assumed that the entire energy requirements and loads of the Moapa Band of Paiutes are being served by Overton Power District (OPD). The Moapa Band of Paiutes have over 1,000 kW of load that is self-served by diesel generators and is entirely off of OPD's distribution service and therefore should be reconsidered separately.

Western's failure to utilize the correct hydropower factor for these Nevada applications has denied or reduced allocations to some Nevada applicants who would have received allocations if the correct hydropower factor was used. The CRC respectfully requests that Western re-run the allocation process adjusting the hydropower factor for applicants in NPC's service territory, to 1.7% and to reevaluate the loads of the Moapa Band of Paiutes not being served by OPD.

III. Granting allocations of Schedule D Hoover power, which would be provided under 50 years contracts, without verifying the load claimed by non-tribal and tribal applicants, raises grave questions regarding whether these allocations are in the public interest.

Substantial questions were raised during the public information forums and public comment forums in this proceeding, regarding whether Western verified applicants' loads as part of its decision-making process resulting in the proposed allocations. As noted above, it is not possible at this time for applicants to determine exactly what Western did, or did not, do in making its decisions. However, it appeared from discussion during the forums that Western did not verify applicants' loads; and that the load data that was used by Western was known to Western to be inaccurate.

The CRC urges Western to make public all available information regarding the process it followed in making its proposed allocations, and to verify non-tribal AND tribal applicants' load data and correct all errors Western made in its load data assumptions, prior to issuing its final allocations in this proceeding.

IV. Western should not apply criteria in a manner which is not authorized by the HPAA, and which improperly denies or reduces allocations to Nevada applicants.

The CRC is extremely concerned that Western's allocations have applied criteria in a manner which does not conform with, and exceeds, Western's delegated authority and powers under the HPAA.

Under Section 5 of the 1928 Act, Congress authorized the delivery of electrical power from Hoover Dam "... to States, municipal corporations, political subdivisions, and private corporations of electrical energy generated at said dam," The HPAA added "... *federally recognized Indian tribes*..." to the list of entities eligible to receive allocations of Schedule D power. However, nothing in the HPAA, authorizes Western to give Tribes preferential treatment over "Section 5 entities" in Western's allocation process. This deviation from Western's statutory powers and authority must be corrected before the Schedule D allocations are finalized.

It should be noted that the CRC supported an amendment to the legislation that became the HPAA, to allow tribes to be added to the 1928 Act list of entities eligible to receive Hoover power. However, it was never contemplated during the Congressional process that including tribes on the list of Hoover-eligible entities would give tribes a higher preference than other types of Section 5 entities, regardless of the relative merits of tribal and non-tribal applications.

For example, CRC has received information that one tribal entity which consists of a single adult and seven children received a Schedule D allocation of 224 kW contingent capacity and 488,601 kWh total firm energy, at the same time that the applications of the Moapa Band of Paiutes, Nye County and the Nevada City of Mesquite were rejected outright. It is very difficult to understand how this type of allocation result serves the public interest, especially given the lack of access to information about Western's calculations discussed above.

Western has the responsibility of verifying tribal loads receiving an allocation of Hoover Power to ensure these allocations are consistent with the Indian Self Determination Act of 1975 as specified in Western's December 30, 2013 FRN.

Furthermore, to the extent that Western's proposed allocations allow or provide for allocations to electric cooperatives, Western has exceeded its statutory authority. As noted above, Section 5 of the 1928 Act identifies potential purchasers of Hoover Power as "States, municipal corporations, political subdivisions, and private corporations of electrical energy generated at said dam," and the 2011 Act further identifies "federally recognized Indian tribes" as potential purchasers of Hoover Power from Schedule D. There simply is no authority under either the 1928 Act or the 2011 Act for allocation of Schedule D power to electric cooperatives. This deviation from Western's statutory powers and authority must be corrected before the Schedule D allocations are finalized. During Congressional deliberations on the HPAA, cooperatives proposed an

amendment to the proposed bill adding them as eligible applicants, but this amendment was rejected by Congress. Federal law does not allow allocations of Hoover power to cooperatives in the Federal process.

During this week's public comment forums, cooperatives and Tribes commended Western for its use of preference law in the Hoover Schedule D allocation process. As Western is well aware, it is authorized to apply preference law to most of its federal hydropower allocations, but is NOT authorized to apply preference law to allocations of Hoover power, which are directed by Congress.

The CRC asks Western to clarify in writing whether its Schedule D allocations were made through application of preference law, or in compliance with the HPAA.

V. Western should allocate Schedule D Hoover power in a manner which brings Nevada closer to the 1/3 share it was granted in the 1928 Act.

Pursuant to Section 5 (c) the Boulder Canyon Project Act of 1928 ("1928 Act"), the States of Arizona, California and Nevada were granted "equal opportunity" as "first preference" applicants for the purchase of electric energy from Hoover Power Plant. While neither Arizona nor Nevada has received past allocations even approaching equality with California, the availability of Schedule D power for allocation by Western under the Hoover Power Plant Act of 2011 provided an opportunity and an obligation for Western to at least partially address this historical inequality among the three States by adjusting its allocations more in favor of Arizona and Nevada consistent with the directive in the 1928 Act. Western's failure to do so should be corrected in its final allocations.

VI. Western Should Specify that Nevada Non-Tribal Allottees will Contract Through CRC.

Western's final FRN should clearly indicate that non-Tribal Allottees located in Nevada must receive Schedule D Hoover power through a contract with the CRC, consistent with the HPAA.

VII. Western Must Assure Entities Crossing State Boundaries Pay Proportionate Share of Expenses.

Western has proposed allocating to Tribes that are located in more than one state and has indicated that tribal loads were considered as a whole and not as a part of a State. However, Western has not explained how it will ensure that tribal new allottees make the payments in support of the Lower Colorado River Multi-Species Program (MSCP) or pay their pro rata shares of Hoover Dam repayable advances paid for by contractors prior to October 1, 2017, as required by the HPAA.

The CRC requests that Western identify each tribal load by State including those Tribes that have proposed allocations in more than one State and give notice to those Tribes of the State for which they will pay a pro rata share of MSCP charges.

Has Western communicated separately with each proposed allottee and regarding load verification? What is the process and timeline for this process? Has Western developed criteria for what constitutes load verification? What are they? Will the results of these communications and load verification be made available to other interested parties for evaluation?

VIII. Western should re-issue its Hoover Conformed Criteria as a single integrated document.

The CRC has asked Western to publish its Hoover Conformed Marketing Criteria in a single integrated document, which including all revisions made in recent years by Western. Unfortunately, Western has not yet done so. Instead, Western only published its changes to the Criteria, without providing clear language showing what was actually changed. As a result, at this point in time, anyone seeking to understand and work with the Conformed Criteria must review at least two separate documents, and they must guess at which older provisions have been revised or superseded by more recent provisions.

Western's Conformed Criteria are being used to perform allocations that will be implemented through contract with 50 year terms, with new customers who are not familiar with the Criteria.

It is essential that Western now do the work necessary to publish the Conformed Criteria in its entirety, so that it can be utilized effectively by applicants and contractors.

IX. Conclusion:

CRC appreciates this opportunity to present written comments, and reserves the right to submit further comments following Western's addressing the issues above, and providing the requested information.

Respectfully submitted,



Jayne Harkins, P.E.
Executive Director

cc: Honorable Senator Harry Reid
Honorable Senator Dean Heller
Honorable Congresswoman Dina Titus
Honorable Congressman Mark Amodei
Honorable Congressman Joseph Heck
Honorable Congressman Steven Horsford
Hoover Schedule D interested parties in Nevada
Current Federal Hoover Customers
Doug Harness
Mike Simonton

Attachments: Exhibits 1, 2, and 3

Craig Pyper

From: Simonton, Michael <Simonton@WAPA.GOV> on behalf of POST2017BCP, POST2017BCP <POST2017BCP@WAPA.GOV>
Sent: Monday, August 18, 2014 3:18 PM
To: Jim Salo; POST2017BCP, POST2017BCP
Cc: Jayne Harkins; Craig Pyper; Harness, Douglas
Subject: RE: FRN -- Western's Proposed Post 2017 Resource Pool Allocations

Jim,

Thank you for your inquiry concerning Western's proposed allocations. Western's allocation process is being conducted under the Administrative Procedure Act (APA) and DOE Organization Act. We understand and appreciate that CRC is receiving questions about the proposal, however, under the APA Western is not allowed to provide you the information you have requested. The APA and DOE Organization Act prohibit the agency involved from selectively disclosing information among interested parties, instead any disclosures must be made to all interested parties. You have essentially asked for all the data Western relied upon to make the proposed allocations, including the information supplied by the applicants. The applicants consider their information proprietary, and they have not given their consent to make the information public.

As you know, Western will be conducting public information forums at which we will be providing a more detailed explanation of how the proposed allocations were determined. We sincerely appreciate CRC's continued interest in our allocation process and we look forward to continuing to work with you to finalize the allocations and subsequent contracts.

Thank you.

-Mike

Mike Simonton

Project Manager I Power Marketing
Desert Southwest Region
Western Area Power Administration
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From: Jim Salo [mailto:jsalo@crc.nv.gov]
Sent: Friday, August 08, 2014 3:59 PM
To: POST2017BCP, POST2017BCP
Cc: Jayne Harkins; Craig Pyper
Subject: FRN -- Western's Proposed Post 2017 Resource Pool Allocations

Mike,

I understand you and Craig Pyper have talked briefly about the FRN on the Hoover Allocations which was published today. As Craig noted to you, we need to understand more fully the methodology(s) used to make the allocation decisions, need to be able to verify the actual calculations that were made and need to be able to replicate the results of Western's process.

For example:

- We cannot determine from the FRN how some allocations were determined; e.g., when applicant A has a larger peak load than applicant B, it is not clear why applicant B received a much larger allocation than applicant A.
- We cannot determine from the FRN how the allocations to individual Tribal entities were determined.

- We cannot determine from the FRN how the “pro rata based on peak load” allocations were made for the individual non-Tribal entities; e.g., the peak load information for the applicants is not shown so it is impossible to verify the resulting “pro rata” allocation(s).
- We cannot determine from the FRN exactly how the availability of power from existing federal hydropower allocations impacted the allocation decisions.
- We cannot determine from the FRN why some entities apparently fell-off-the-cliff in your “pro rata based on peak load” allocation process made for the non-Tribal entities.

Broadly speaking, we’re being asked whether or not Western consistently and accurately applied its criteria to all applicants and do not have sufficient information in the FRN to allow us to answer those questions.

We believe all of the interested parties in this process both deserve and need to have access to much more information from Western in order to fully understand how the proposed allocations were determined. Without such information, interested parties’ comments to be submitted in the near future would likely need to focus on the lack of transparency in the FRN and the “black-box” nature of the resulting allocations.

Interested parties need:

- To have access to your work-papers, spreadsheets, etc., that would allow a reviewer to replicate the proposed allocations
- To have access to the actual applications or at least to all of the relevant data from the applications which support the proposed allocations.

We believe interested party access to this additional data is a necessary prerequisite to the information meetings and comment sessions now scheduled in the near future. Will Western make more information available? If so, please inform us exactly what additional information will be made available and when it will be available.

Thank you,

Jim

James D. Salo
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Exhibit 2
STATE OF NEVADA

BRIAN SANDOVAL, *Governor*
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JAYNE HARKINS, P.E., *Executive Director*



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STEVE SISOLAK, *Commissioner*

COLORADO RIVER COMMISSION
OF NEVADA

September 10, 2014

Mr. Ronald E. Moulton
Acting Regional Manager
Desert Southwest Customer Service Region
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

E-mail: Post2017BCP@wapa.gov

SUBJECT: Western's Proposed Hoover Schedule D Allocations - Federal Register Notice (FRN) -- 79 FR 46432

REQUEST FOR EXTENSION OF TIME FOR SUBMITTAL OF WRITTEN
COMMENTS TO FRIDAY, OCTOBER 3, 2014

Dear Mr. Moulton:

The Colorado River Commission of Nevada (CRC) submits this Request for an Extension of Time for Submittal of Written Comments to Friday, October 3, 2014.

Many questions have arisen regarding how Western determined each of its proposed allocations in the FRN published on August 8 of this year. Both current and potential new Hoover customers have posed many questions seeking a more detailed understanding of the rationale behind the FRN. Some questions were answered during the recent Public Information Forums on August 26 – 28, 2014. The CRC has also been in discussions with Western trying to obtain further substantive information and clarifications. However, there are still many questions Western has not answered yet, and a lot of data to review.

Western's Public Comment Forums are scheduled next week. Interested parties are expected to submit oral comments at those forums and to submit final written comments on September 19th, *just one day* after the Thursday, September 18th final Public Comment Forum.

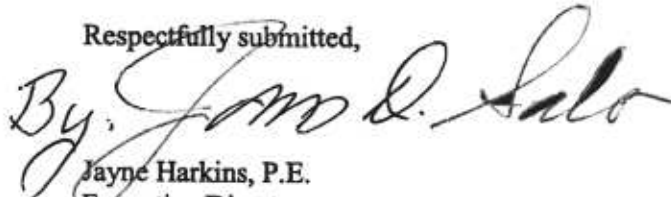
Western's Proposed Hoover Schedule D Allocations
Request for Extension of Time for Submittal of Written Comments

September 10, 2014
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We understand the tight timeframe that Western is under, but it is entirely unreasonable to set the deadline for written comments on September 19th, again, just one day after the final Public Comment Forum and only 3 weeks after the Public Information Forums, particularly given that Western has already refused to respond substantively to a number of requests for information or clarification concerning its analysis used to determine the allocations proposed in the FRN.

Therefore, the CRC requests that Western extend the due date for written comments for two weeks, until Friday, October 3, 2014.

Respectfully submitted,

By: 
Jayne Harkins, P.E.
Executive Director

JH/JDS/clp

cc: Honorable Harry Reid
Honorable Dean Heller
Honorable Dina Titus
Honorable Mark Amodei
Honorable Dr. Joseph Heck
Honorable Steven Horsford
Hoover Schedule D interested parties in Nevada
Current Federal Hoover Customers
Doug Harness
Mike Simonton



Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457

September 15, 2014

Ms. Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 East Washington Avenue, Suite 3100
Las Vegas, NV 89101-1065

Dear Ms. Harkins: *JAYNE*

Thank you for your letter dated September 10, 2014, regarding Western's Proposed Hoover Schedule D Allocations published August 8, 2014 (79 FR 46432). Western appreciates your interest in this effort.

Western has considered the Colorado River Commission of Nevada's request for an extension of time for submittal of written comments from Friday, September 19, 2014 to Friday, October 3, 2014. However, Western believes extension of the comment deadline would substantially jeopardize Western's ability to make final allocations within the time frame required by the Hoover Power Allocation Act of 2011. Western has responded to all inquiries submitted so far during the comment period and we want to make sure we have adequate time to consider the comments we receive. Therefore, Western has decided to retain the existing comment deadline of Friday, September 19, 2014.

If you have any questions, please contact Mr. Mike Simonton, Public Utilities Specialist, at 602-605-2675 or by e-mail at Simonton@wapa.gov.

Sincerely,

A handwritten signature in black ink that reads "Ronald E. Moulton".

Ronald E. Moulton
Acting Senior Vice President and
Desert Southwest Regional Manager

Exhibit 3
Appropriate Calculation for Nevada Power Company's Hydropower Percentages

Western's Current Calculation:

Nevada Power Company's (NPC) 2012 System Peak as identified in EIA report:	5,761,000 kW
CRC Hoover Allocation to NPC ¹	
Schedule A	100,232 kW
Schedule B	135,000 kW
Total Hoover	235,232

Western Formulation of all Hoover allocation to NPC System Peak 4.1%

Nevada's Proposed Calculation:

CRC Hoover Allocation (*Schedule B is limited to residential customers only, Schedule A to all NPC customers including residential*)²
 Per NPC, they can estimate residential peak and non-residential peaks by Energy Sales

Total NPC Energy Sales by Class ³				
	MWH			Peak by Class
Residential	9,195,689	42.7%	Residential	2,458,324 kW
Non-Residential	12,354,102	57.3%	Non-Residential	3,302,676 kW
Total	21,549,791			5,761,000 kW

NPC Hoover Allocation from CRC that serves each Class of Customers				
	Hoover kW		Hoover Allocation Serving only Residential	Hoover Allocation Serving only Non-Residential
Schedule B	135,000		135,000	
Schedule A	100,232		42,771	57,461 kW
	235,232		177,771	57,461 kW

NPC Non-Residential Peak being served by Hoover

NPC Non-Residential Peak	3,302,676 kW
Hoover Allocation Serving only Non-Residential Loads	57,461 kW
Proper Percentage of Hoover Serving Nevada applicants in NPC Service Territory	1.7% Percent

Notes:

- ¹ NPC current Schedule A and B contract capacity allocation.
- ² Pursuant to NRS 704.787, NPC must pass through the benefit of Schedule B to its residential class of customers.
- ³ Total NPC Energy Sales by Class is identified on line 67 of NPC's June 30, 2013 BTER calculation spreadsheet

