September 19, 2014

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

Re: Comments on Notice of Proposed Allocation Boulder Canyon Project – Post-2017 Resource
        Pool

Dear Mr. Moulton:

The Metropolitan Domestic Water Improvement District (District) thanks the Desert Southwest Customer Service Region Office of the Western Area Power Administration (WAPA) for an expedient and fair allocation process regarding the Boulder Canyon Project-Post-2017 Resource Pool. The District appreciates Mr. Michael Simonton's answering our questions on the methodology used by WAPA to calculate the proposed allocation for the District.

As noted in our application, the District has four active water service areas. Three of these service areas receive electricity solely from one electrical company (Tucson Electric Power), while the fourth service area is solely provided electricity by Trico Electric Cooperative. The District's application noted these electrical providers and which electrical provider served which water service area and how much power. The majority of our electrical power is served by Tucson Electric Power. Our application also noted that the District was not aware of Tucson Electric Power having federal power contracts, but did acknowledge that Trico Electric Cooperative did. We understand that the District's allocation would be reduced by WAFA by a calculated percentage of federal power received from Trico Electric Cooperative.

The District requests WAPA revise its allocation for the District if the calculation used for the District assumed that both Tucson Electric Power and Trico Electric Cooperative received federal power.

Please feel free to call me at (520) 575-8100, if you have questions on this comment.

Sincerely,

Michael W. Block
Water Resources Manager