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March 2, 2010

Mr. Darrick Moe  
Western Area Power Administration  
Desert Southwest Region  
Post Office Box 6457  
Phoenix, Arizona 85005-6457

Re: **Second Set of Comments of the Arizona Municipal Power Users' Association  
Concerning Western Proposal on Use of Funds**

Dear Mr. Moe:

Our Association appreciated the presentation made by you and your staff concerning the Western concept of utilizing funds to assist in capital projects. We have a series of concerns and questions.

1. Can you provide the amount of P-DP annual and capital dollars spent on wood pole rehabilitation over the past twelve (12) years?
2. Please provide the number of miles of steel structure conversions over the past twelve (12) years on the P-DP system.
3. Utilities use reliability metrics such as increases in the number of outages, increases in the number of hours of customer outages, frequency of transfer path curtailments, etc. to determine that the system or lines need rehabilitation. Please provide the reliability metrics or outage data for the lines in question.
4. Please provide any wood structure testing program summary results that may have been done to determine the wood pole replacement program contemplated.

5. What life span analysis studies have been done over the last eight (8) years concerning various segments of the Parker-Davis system, including the following:

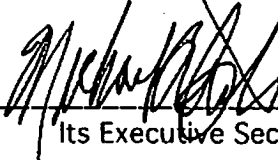
- a. South of Parker;
- b. North of Parker;
- c. To Phoenix;
- d. To Casa Grande;
- e. To Marana; and
- f. To AEPCO.

6. How would Western propose to use the \$15 million currently available? Was the \$15 million currently available originally slated for annual expenses or for capital expenditures?

7. The Parker-Davis customers have agreed in contracts with the Bureau and Western on a method and manner of having customers approve capital expenditures requested by Western which, if not approved, require that Western and/or the Bureau make application to Congress for appropriations. Please describe why this type of program would not be suitable in the implementation of the current Western concept on use of funds.

Very truly yours,

ARIZONA MUNICIPAL POWER USERS'  
ASSOCIATION

By  \_\_\_\_\_  
Its Executive Secretary

cc: AMPUA Membership