



# San Diego County Water Authority

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**Mike Simonton**  
Project Manager, Boulder Canyon Remarketing  
Western Area Power Administration  
615 South 43<sup>rd</sup> Avenue  
Phoenix, AZ 85005

**MEMBER AGENCIES**

- Carlsbad Municipal Water District
- City of Del Mar
- City of Escondido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- Fallbrook Public Utility District
- Helix Water District
- Lakeside Water District
- Olivenhain Municipal Water District
- Otay Water District
- Padre Dam Municipal Water District
- Camp Pendleton Marine Corps Base
- Rainbow Municipal Water District
- Ramona Municipal Water District
- Rincon del Diablo Municipal Water District
- San Dieguito Water District
- Santa Fe Irrigation District
- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
- Vista Irrigation District
- Yuima Municipal Water District

**OTHER REPRESENTATIVE**

- County of San Diego

Via email: [Simonton@wapa.gov](mailto:Simonton@wapa.gov)

Dear Mike:

I am writing to outline the perspective of the San Diego County Water Authority on the eligibility criteria for the post-2017 marketing plan for the Boulder Canyon Project (BCP). The Water Authority is a wholesale public water agency that imports water supplies from the Colorado River and Northern California. Supplies from the Colorado River account for approximately 55 percent of all water used in San Diego County. In all, the Water Authority provides approximately 80 percent of all water used in San Diego County to support our region's \$186 billion economy and the quality of life of 3.1 million people.

As you know, the statutory construct for the marketing of BCP power differs from the applicable requirements for other WAPA resources. It is important that these differences be recognized and appropriately accommodated in the development of eligibility criteria and allocation standards. To that end, the Water Authority offers the following suggestions as you move forward:

1. **Eligible Entities:** Section 5 of the Boulder Canyon Project Act of 1928 is clear on the requirements that must be met to be eligible to receive an allocation of project power. Under the statute, electrical energy generated at the dam could be distributed to "States, municipal corporations, political subdivisions, and private corporations." The Water Authority qualifies as a political subdivision and we would discourage WAPA from deviating from this statutory construction by imposing more restrictive eligibility requirements.
2. **Promotion of Environmental Objectives:** The Water Authority is in final negotiations on a 30-year water purchase agreement to buy water from the only fully permitted seawater desalination plant in the Western United States. Energy costs account for approximately one-fourth of cost of

desalinated seawater. Accordingly, receipt of a BCP allocation would enable the Water Authority to lower the cost of supplies from this high-tech, drought-proof water supply project.

3. Access to Both New Entrant Sub-pools: Two resource pools are available to new entrants in the post-2017 marketing plan. One pool is to be allocated by the Secretary of Energy to new entrants located anywhere within the marketing plan foot print. The second pool is allocated by State (with WAPA assuming responsibility for allocating the California-specific sub-pool). The Water Authority believes that parties should be eligible to apply for, and receive power from both sub-pool categories. For purposes of California entities, this means that WAPA could provide allocations to the same new entrant from both the California set-aside and the new entrant pool allocated by the Secretary.

We appreciate your consideration of our views and suggestions. We would be happy to talk with you by conference call or meet in person if you would find further dialogue or information helpful.

Sincerely,



Maureen A. Stapleton  
General Manager