



Phone: (520) 383-2236  
Fax: (520) 383-2218

**Tohono O'odham Utility Authority**  
Post Office Box 816  
Sells, Arizona 85634

**Sent via email to: Post2017BCP@wapa.gov**

September 17, 2014

Mr. Ronald E. Moulton  
Acting Regional Manager  
Western Area Power Administration Desert SW Office  
P.O. Box 6457  
Phoenix, AZ 85005-6457

Dear Mr. Moulton:

Please accept these comments on the Post2017-BCP Marketing process on behalf of Tohono O'odham Nation/Tohono O'odham Utility Authority. We are writing in response to both the allocations proposed by Western in the Federal Register on August 8, 2014 and the comments made by Western representatives at the public comment forums held by Western the week of August 25, 2014.

My tribe wishes to convey its support for tribal allocations as proposed and also note its support for a final allocation scheme that vests allocations of at least some quantity over the minimum 100kW to every tribal applicant. As Western representatives stressed the "proposed" nature of the published allocations during the August public comment forums while also noting that those totals listed will be adjusted before finalizing, we understand that some risk to the identified tribal recipients exists. As other tribal applicants received no proposed allocations, my tribe supports any reallocation scheme that favors all tribes including those not already considered qualified.

Western's application of its published allocation criteria in this process need not penalize any tribes, as Western's own wording does not, by itself, preclude allocations to specific tribal applicants. Instead, the wording as written allows for tribes to now receive Boulder Canyon power without a total preclusion based on the receipt of other Federal resources. Such a revision to what is now proposed would be consistent with Western's obligations as resource administrator and Federal trustee to tribal interests, while also avoiding a disparate burden on non-tribal customers, as California recipients are proposed to receive an almost proximate share of the resource (20.8%) despite the absence of historical or trust considerations.

We hope you will revise the proposed allocations in accordance with these comments.

Sincerely,

Mike Bethurem, General Manager  
Tohono O'odham Utility Authority