



August 30, 2022

Mr. Rodney Bailey, CRSP Manager  
CRSP Management Center (MC)  
Western Area Power Administration  
1800 South Rio Grande Avenue  
Montrose, CO 81401  
Emailed: [olmsted-marketing@wapa.gov](mailto:olmsted-marketing@wapa.gov)

Subject: UMPA's Comments to WAPA's Proposed 2025 Olmsted Power Marketing Plan

Dear Mr. Bailey:

### **Background**

Utah Municipal Power Agency (UMPA) appreciates the opportunity to comment on Western Area Power Administration's (WAPA) proposed 2025 Olmsted Power Marketing Plan. For the past several years, UMPA has valued its 30% allocation of the renewable, clean energy generated by the Olmsted Power Plant operated by the Central Utah Water Conservancy District (CUWCD). UMPA's contracts with WAPA that provide federal power are critical in serving the electrical consumers in our public power communities.

We value our long-standing working relationship with WAPA's staff and acknowledge their skills and efforts in managing these facilities. The current drought conditions add to the power supply challenges and we appreciate their efforts in solving these challenges and meeting the growth for energy in the west. In support of WAPA, we submit the following comments and changes to the proposed 2025 Olmsted Power Marketing Plan.

### **Marketing Area**

We stand by our original comments filed in 2017 with the first Olmsted marketing plan. WAPA did not adhere to the basic definition and logic of describing the marketing area as "close proximity to the Olmsted facility" and later including counties as far north as Weber County. Given the size of the project and the number of viable candidates, UMPA would recommend the marketing area to be defined as the two counties within the Provo River drainage – Utah and Wasatch counties.

We acknowledge the benefit to UMPA by WAPA recognizing the close proximity to the project and adding Juab County in the south to the proposed marketing area. UMPA appreciates the addition. It is a good step in redrawing the boundary lines by similar proximity to the project and will hopefully benefit UMPA's application for an allocation of Olmsted generation.

### **Resource Extension & Resource Pool Allocation**

UMPA supports WAPA's proposal to provide 95% of Olmsted's available energy to existing customers ensuring UMPA's right to a 2025 marketing allocation. We support that the 5% set aside for new customers does not apply to CUWCD.

## UTAH MUNICIPAL POWER AGENCY

UMPA does not support the use of Olmsted energy for the “June Sucker” fish restoration efforts required by the Central Utah Project Completion Act. We support the fish restoration efforts; however, the project power for such effort should come from CRSP project power, not from Olmsted. Olmsted resource is very limited and the few existing Olmsted customers should not cover the energy costs for the June Sucker program which benefits the public. Although the energy allocation is small for the planned aeration program, the power and energy for this greater good for the public effort for restoring the fishery should come the CRSP. We add our support to CUWCD’s position on this matter and in their role in the restoration program.

### **Contract Term:**

We support long-term contracts for the Olmsted resources which helps in planning for the future. WAPA’s proposal for a ten-year term with two automatic renewals of two additional five-year terms is acceptable. However, UMPA would propose the contract term be set at twenty-years with the added five-year terms. We believe that it would be easier on WAPA and CUWCD for planning and allocating costs for major maintenance work and overhaul repairs and ask for reconsideration by WAPA.

### **Other Application Criteria**

UMPA supports the other marketing criteria in the notice. UMPA is a preference entity serving the electrical needs of six municipalities (Provo, Spanish Fork, Salem, Nephi, Levan and Manti), five members within the marketing area. UMPA stands “Ready, Willing and Able” to receive the power and energy from the Olmsted resource. UMPA’s load requirements continue to grow in providing electricity needs to its member cities. The impact of the drought on CRSP causes UMPA to seek additional energy in order to meet its obligation to its members. UMPA was helpful in working with WAPA and CUWCD in setting up the forecasting and scheduling for the benefit of the Olmsted customers. Based on historical compliance with these terms and conditions of the contract, UMPA is prepared to accept a new allocation of Olmsted energy.

### **Summary**

We support the efforts of CUWCD in the operation and maintenance of the Olmsted hydroelectric facilities. We value their opinions and support their efforts. We express our appreciation to the WAPA staff for inviting comments to the proposed marketing plan. As stated earlier, the federal power administered by WAPA is critical to UMPA. We acknowledge the efforts of WAPA in working with its customers in addressing the challenges of the drought.

We welcome any questions by WAPA and for the opportunity to clarify any of our comments on the proposed 2025 Olmsted Marketing Plan.

Sincerely,



Layne Burningham, President & CEO  
Utah Municipal Power Agency

CC David Pitcher, Central Utah Water Conservancy District  
Leslie James, CREDA