

AGUILA IRRIGATION DISTRICT

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Rebecca Johnson, Transmission and Power Markets Advisor at (720) 376-2400,
Western Area Power Administration,
12155 West Alameda Parkway
Lakewood, CO 80228-8213.
SPP-Comments@wapa.gov

RE: Comments of the Aguila Irrigation District in response to the Recommendation for the Western Area Power Administration's Rocky Mountain Region and Colorado River Storage Project Management Center to Pursue Final Negotiations Regarding Membership in the Southwest Power Pool Regional Transmission Organization, and for the Upper Great Plains Region to Expand its Participation ("Recommendation") originally published in the Federal Register (88 FR 26298) on April 28, 2023

Dear Ms. Johnson:

Aguila Irrigation District respectfully provides the following to the Recommendation published in the Federal Register (88 FR 26298) on April 28, 2023.

Aguila Irrigation District is a municipal corporation and political subdivision of the State of Arizona, which serves wholesale electricity to customers within its boundaries in Maricopa County, Arizona.

With resource adequacy being a pressing issue among Lower Basin service providers, Aguila Irrigation District is concerned the recent Federal Register notice may exacerbate the already tenuous situation in the Lower Basin region. CRSP has provided long-term energy and resource adequacy (RA) benefits equitably to both Upper and Lower Basin regions. Recent assessments conducted by the North American Electric Reliability Corporation and Western Electricity Coordinating Council have identified a significant capacity shortfall in the Desert Southwest region. Such capacity shortfall, coupled with increased volatility in the wholesale power markets, increased costs in goods & services, and supply chain disruptions greatly support the need for continued accessibility and affordability of the CRSP Resource for Lower Basin customers. Without the CRSP Resource, the Lower Basin region risks increased resource instability.

If WAPA ultimately moves to join the SPP in accordance with the posted Federal Register notice, we would urge that WAPA take steps to guarantee that the Lower Basin continues to receive equitable access to CRSP resources under existing contracts. Doing so will help ensure that all Lower Basin service providers, both those with existing Firm Electric Service contracts and those without, will have the ability to continue to supply affordable and reliable energy to our customers.

RESPECTFULLY SUBMITTED this 12th day of June, 2023.

Aguila Irrigation District

A handwritten signature in blue ink, appearing to be 'JM', written over a horizontal line.

By _____
Jason Y. Moyes, Manager