



Hohokam Irrigation & Drainage District
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RE: Hohokam Irrigation and Drainage District (HIDD), Pinal County, Arizona comments in response to the recommendation for the Western Area Power Administration's (WAPA) Rocky Mountain Region and Colorado River Storage Project (CRSP) Management Center to pursue final negotiations regarding membership in the Southwest Power Pool (SPP) 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

Hohokam Irrigation and Drainage District respectfully provides the following to the recommendation published in the Federal Register (88 FR 26298) on April 28, 2023.

1. **Hohokam Irrigation and Drainage District** is an Arizona non-profit political subdivision electric utility Federal preference customer of WAPA. It represents 27,000 acres and 1,800 retail consumers in Pinal County.
2. Recent assessments conducted by the North American Electric Reliability Corporation and Western Electricity Coordinating Council have identified a significant capacity shortfall in Hohokam's Desert Southwest region. CRSP has provided long-term energy and resource adequacy (RA) benefits equitably to both Upper and Lower Basin regions. Such capacity shortfalls, coupled with increased volatility in the wholesale power markets have increased costs in goods & services. Supply chain disruptions greatly support the need for continued accessibility and affordability of the CRSP resource to the Desert Southwest and Arizona.
3. Southwest Power Pool Regional Transmission Organization participation by Western must ensure all attributes of CRSP resources are preserved for **all** customers. As a condition of WAPA agreeing to enter final negotiations with SPP, HIDD requests that WAPA ensure **equal** and **full** access to the CRSP resource and resource attributes for Firm Electric Service (FES) customers located inside and outside of the SPP Regional Transmission Operator (RTO) footprint and in accordance with existing FES contracts. WAPA must declare in the final decisional document to enter final negotiations that it will not finalize

membership in SPP for CRSP if WAPA cannot secure the necessary arrangements to provide Southern Division customers the benefits of FES contracts through participation in SPP. Failure to mandate this condition as a prerequisite to WAPA agreeing to final negotiations would suggest that WAPA does not intend to address the discriminatory treatment and disadvantage to customers located outside of the footprint.

4. Customers must be assured the same attributes of the CRSP resources will be provided to the customers located inside and outside of the SPP RTO footprint through final negotiations and implementation of readily known technical solutions described in greater detail in the “Colorado River Storage Project Bifurcation – Principles Attachment A”.
5. Consistent with Section 1232 of the Energy Policy Act of 2005, WAPA must specifically delineate how any final agreement executed between SPP and WAPA will ensure consistency in delivering the full benefits of existing FES contracts in the final decision to proceed with negotiations. Failure to respond to this request and document an intent to honor contractual obligations will indicate that WAPA does not intend to honor the terms and conditions of the FES contracts and demonstrate an anticipatory abrogation of WAPA’s contractual obligations to FES contractors.

RESPECTFULLY SUBMITTED this 5th day of June 2023.

Hohokam Irrigation and Drainage District

By *Grace Garcia*
Grace Garcia
General Manager