



IRRIGATION & ELECTRICAL DISTRICTS'  
ASSOCIATION OF ARIZONA

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July 11, 2023

**RE: Additional Comments of Arizona Electric Power Cooperative on Western Area Power Administration Federal Register Notice on Whether to Enter Final Negotiations with Southwest Power Pool**

Dear Ms. Johnson;

On behalf of the Irrigation & Electrical Districts Association of Arizona (IEDA), we submit the following additional comments to the Recommendation published in the Federal Register (88 FR 26298) on April 28, 2023. These comments are provided following the letter from Administrator LeBeau on June 14, 2023, which extended the comment period to July 11, 2023.

IEDA represents 24 members with Western Area Power Administration (WAPA) contracts, 15 of whom have Firm Electric Service (FES) for capacity and energy provided by the Colorado River Storage Project (CRSP). IEDA has been in existence since 1962, and its primary purpose is protecting its members' contracts for federal hydropower.

IEDA appreciates WAPA's response to our members' multiple letters by extending the comment period and providing the webinar on June 27<sup>th</sup>. During that webinar, it was requested that WAPA establish a set of Definitive Principles in conjunction with CRSP DSW Contractors. IEDA supports this request, and it should be crafted in conjunction with customers across WAPA's CRSP footprint to address and mitigate concerns with the proposed SPP integration.

We have raised concerns for well over a year that CAISO's tariffs (e.g., *Section 40.8.1.12 System Resources and Pseudo-Ties & 40.10.3.6 Non-Eligible Resources*) treatment of

generation outside its footprint could jeopardize CRSP's RA Capacity for the Southern Division customers. Preserving the RA Capacity value of CRSP continues to be IEDA's foremost concern. We appreciate the options contemplated in the CRSP Crosswalk document, and it shows WAPA's willingness to honor its contractual obligations and need to address this issue.

While the CRSP Crosswalk document attempted to address one of our concerns, some of the transmission questions we have raised remain unresolved. For example, our letter on August 16th, 2022, inquired about how the Four Corners-San-Juan-Shiprock common bus will be treated in the future. The response from CRSP Manager Rodney Bailey, dated September 27, 2022, suggested possibly moving it into the APS BA. How would this impact the CRSP transmission system? Would this create another seams issue?

We understand that moving part of CRSP into SPP will provide solutions to Northern Division customers, and IEDA is not opposed to WAPA helping to solve those issues. However, Southern Division customers don't want to be harmed by a decision that solves one group's issues but negatively impacts another.

As markets in the West continue to expand in geography and complexity, any consideration to enter a market should be fully vetted by all impacted customers. IEDA hopes that WAPA can learn from this current undertaking and have a more robust and transparent process in the future, listening and working with all customers with interests in the decision.

As always, if there is any assistance that IEDA can provide to aid in this process, please let us know. We look forward to working with you in the future to help resolve these concerns.

Sincerely,

A handwritten signature in blue ink that reads "Ed Gerak". The signature is written in a cursive, slightly slanted style.

Ed Gerak  
IEDA