



CREDA
Colorado River Energy Distributors Association

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

CORE Electric Cooperative

Holy Cross Energy

Platte River Power Authority

Tri-State Generation & Transmission Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric Association, Inc.

NEBRASKA

Municipal Energy Agency of Nebraska
(also Colorado, Wyoming)

NEVADA

Colorado River Commission of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

UTAH

City of Provo

City of St. George

Heber Light & Power

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

Leslie James

Executive Director

CREDA

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January 29, 2024

Barton V. Barnhart, Regional Manager

Rocky Mountain Region, WAPA

Via email: laptransadj@wapa.gov

RE: Central Arizona Project, Colorado River Storage Project, Loveland Area Projects, Pacific Northwest-Pacific Southwest Intertie Project, and Parker-Davis Project—Rate Order No. WAPA– 215 (WAPA-215)

Dear Mr. Barnhart:

The Colorado River Energy Distributors Association (CREDA) offers comments in response to the WAPA-215 Rate Order (89 FR 13, January 19, 2024). CREDA represents a majority of the firm electric service customers of the Colorado River Storage Project, which members have a direct interest in this Rate Order.

CREDA supports the proposed formula rate extension as described in the Rate Order, with a recommendation that the following paragraph be removed as unnecessary and refers to potential future actions that are the subject of separate processes: “This extension will allow CRSP MC and RM to proceed with final negotiations for membership in the Southwest Power Pool Regional Transmission Organization (SPP RTO), with potential membership beginning in or around April 2026, after which CRSP MC and RM would no longer provide this transmission service. DSW would evaluate whether it will continue selling this service beyond that date, as will CRSP MC and RM if their proposed integration into the SPP RTO is delayed or is not successful.” (FR at 3651).

As offered in the Rate Order, CREDA requests to be informed of Federal Energy Regulatory Commission (FERC) actions concerning the proposed extension to be submitted by WAPA to FERC for approval.

Thank you for consideration of these requests. I am available to discuss at your convenience.

Leslie James

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Executive Director

Cc: CREDA Board

Tracey LeBeau

Rodney Bailey

Tamala Gheller