



August 15, 2024

Jack Murray
Regional Manager, DSW Region
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

Delivered via email to pdp-remarketing@wapa.gov

Dear Mr. Murray,

On behalf of the Arizona Municipal Power Users' Association (AMPUA), I am writing in response to the Federal Register Notice posted on May 20th, 2024 related to the Proposed 2028 Parker-Davis Project Power Marketing Plan.

AMPUA is an association of Arizona public and consumer owned power entities including irrigation districts, electrical districts, electric cooperatives, municipally owned electric systems, Salt River Project, and Central Arizona Project.

On behalf of our members, AMPUA appreciates WAPA's deliberate approach to the 2028 marketing plan. While our members have concerns regarding opening the resource pool to new entrants, they are appreciative that the new availability is limited to a small 2% new entrant pool and that WAPA staff are working to offset this expansion with the 2025 upgrade of a generation unit at Davis Dam. Our members are in support of WAPA's decision to limit the eligibility of new entrants to those who do not have other federal hydropower. Existing Parker-Davis customers have maintained this hydropower resource for many years. New entrants will be taking advantage of our members' longstanding financial commitments to maintain that resource. We would prefer that new entrants be assessed repayment of a portion of undepreciated replacement advances to recognize the benefit they are gaining access to.

We are grateful to and congratulate WAPA for its efforts to minimize the impact to existing Parker-Davis FES customers. Federal hydropower is an extremely valuable and highly flexible carbon-free generation resource. As the Colorado River continues to face severe drought, we also appreciate that the Proposed 2028 Parker-Davis Project Power Marketing Plan recognizes the changing conditions on the Colorado River and the impact those conditions have on hydropower generation.

AMPUA appreciates the opportunity to provide public comment and is thankful for WAPA's efforts regarding the remarketing effort.

Sincerely,

Russell D. Smoldon
Executive Director, Arizona Municipal Power Users' Association