



CITY OF RANCHO CUCAMONGA

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July 24, 2024

Western Area Power Administration
Mr. Jack D. Murray
Senior VP and Desert Southwest Regional Manager
P.O. Box 6457
Phoenix, AZ 85005-6457
Via Email: pdp-remarketing@wapa.gov

Dear Mr. Murray:

We appreciate the opportunity to provide comments on the proposed marketing criteria to be used to allocate the Proposed 2028 Parker-Davis Project (PD-P). The City of Rancho Cucamonga (City), located in Southern California in the Desert Southwest region has one of California's newer municipal electric utilities and is currently a recipient of Western's Boulder Canyon Project (BCP) power resource from the post 2017 re-marketing.

Under Section C-3 of the Federal Register Notice (Notice), Western proposes that qualified applicants for PD-P must not have a contract with Western for federal power resources. While the City understands that this has historically been Western's approach and policy of encouraging widespread use of federal power, we believe that this policy hinders smaller electric utilities such as the City from having another stable federal power resource, which has greatly benefitted our small electric utility.

The City is requesting that Western reconsiders Section C-3's criteria and consider adjusting the proposed eligibility criteria language to "*Qualified applicants must not have a significant allocation of Federal Power*" in order to not disqualify small electric utilities like the City that currently receives a small BCP federal power allocation from being considered a 2028 PD-P qualified applicant.

Additionally, under Section B of the Notice, Western is proposing that its resource pool allocations "*be returned to existing contractors if enough new preference customers are not found.*" The City is requesting that Western reconsiders this option and allow for additional qualified applicants that may have a small share of existing federal power resources to be considered in lieu of returning the unused allocation pool back to the existing PD-P contractors.

Thank you for the opportunity to provide our comments and we look forward to working with Western during this remarketing effort. Should you have any additional questions, please feel free to contact me at fred.lyn@cityofrc.us.

Sincerely,

Fred Lyn
Deputy Director of Engineering Services-Utilities