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**COLORADO RIVER COMMISSION
OF NEVADA**

August 19, 2024

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

Sent via Email: pdp-remarketing@wapa.gov

Subject: WAPA Proposed 2028 Parker-Davis Project Power Marketing Plan

Dear Mr. Murray,

The Colorado River Commission of Nevada (CRCNV) is a long-standing Parker-Davis Project preference customer of the Western Area Power Administration (WAPA). The CRCNV appreciates this opportunity to reiterate our support for WAPA's proposed 2028 Parker-Davis Project Power Marketing Plan.

The CRCNV supports WAPA's use of the Energy Planning and Management Program and the framework of the Power Marketing Initiative (PMI) for the remarketing of Parker-Davis Project power and extending allocations for most of the current customers. We recognize the PMI calls for a new customer power pool to promote WAPA's goal of widespread use of federal hydropower. The introduction of a new customer pool for allocation, during a time when the resource is diminishing, is concerning. However, WAPA's proposal of a small, one-time, new customer pool appears to be a reasonable compromise to ensure that existing contractors continue to receive most of their existing resources.

The CRCNV supports WAPA's proposal for energy commitments that are based on estimated generation, rather than firm, contractual commitments. We appreciate the specificity WAPA has provided to define the product and explain the new process. In doing so, we hope that the final process for estimating, committing, and scheduling the resource will be described in detail in the actual contract, as well as the Metering and Scheduling agreements, and not solely in the Final Marketing Plan.

The CRCNV supports being able to optimize the full use of its transmission rights under the new contract. We support WAPA working with the customers to achieve these objectives.

The CRCNV also wishes to ensure that the new contract will enable WAPA's customers to use the resource in current and future energy markets, including the use of Renewable Energy Certificates (REC). We hope that WAPA will publish their new REC policy soon, but no later than the start of contract negotiations. Without an actual policy, we cannot fully appreciate how this and other federal hydropower resources will be affected.

The CRCNV looks forward to working with WAPA and continuing our long-standing cooperative relationship.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Witkoski", with a stylized flourish at the end.

Eric Witkoski
Executive Director

CC: Gail Bates, gbates@crc.nv.gov