

SAN LUIS REY INDIAN WATER AUTHORITY

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The following comments are submitted regarding the Western Area Power Administration's (WAPA) notice of proposed power marketing initiative from the Parker-Davis Project. The notice was published at 89 Fed. Reg. 98 (May 20, 2024). The comments are submitted on behalf of the San Luis Rey Indian Water Authority (Indian Water Authority), consisting of the following five tribal entities:

La Jolla Band of Luiseño Indians
Pauma Band of Luiseño Indians
San Pasqual Band of Mission Indians

Pala Band of Mission Indians
Rincon Band of Luiseño Indians

The Indian Water Authority is a permanent intertribal entity established pursuant to duly adopted tribal ordinances. The power of the Indian Water Authority to act for the five Indian Bands that established it is recognized and approved by section 107 of the San Luis Rey Indian Water Rights Settlement Act. All of the entities are located in northern San Diego County, California, within the marketing area for Parker-Davis power.

The Indian Water Authority appreciated the information received at the June 20, 2024 public information forum and provides the following responses to four specific issues raised by WAPA:

- 1) EPAMP/PMI Proposal;
- 2) Quarterly energy proposal;
- 3) Optional energy proposal; and
- 4) Minimum scheduling proposal

EPAMP/PMI Proposal:

The Indian Water Authority does not support using the EPAMP/PMI proposal for Parker-Davis marketing plan because of the significant reduction WAPA is proposing for the energy deliveries per kilowatt of allocation along with the impact the capacity reduction may have on our current crediting arrangement. While the proposal reduces the summer capacity by 0.58 percent and

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winter capacity by 0.15 percent, the energy reductions are significantly larger than those percentages and will exceed 20 percent in some years.

In addition, the proposed reductions of 1kw for the winter and 16 kw for the summer capacity to the Indian Water Authority may impact our existing crediting arrangement. WAPA states that it markets power consistent with sound business principles and therefore must weigh the benefit of another entity receiving 1 kw of winter and 16 kw of summer capacity versus the cost that may be incurred by the Indian Water Authority if its crediting arrangement is impacted. Sound business principles means that WAPA's actions should create benefits that exceed the cost to those incurring a withdrawal.

If WAPA creates a resource pool, the Indian Water Authority proposes that the additional 3,750 kw of marketable capacity from Davis Powerplant be used for new allottees and existing customers capacity allocations be maintained at their current amounts.

Quarterly Energy Proposal:

The Indian Water Authority is concerned that the quarterly energy proposal may affect the existing metering and scheduling instructions with our scheduling agency. We want WAPA to coordinate with our scheduling agent to ensure that any energy delivery changes meet with their approval.

Optional Energy Proposal:

The Indian Water Authority supports the concept of optional energy purchases, giving the customers a choice for energy deliveries. WAPA may need to purchase energy deliveries on our behalf to ensure the existing delivery requirements in our contract and metering and scheduling instructions are met. We would appreciate WAPA developing a plan to meet our requirements while minimizing the energy purchase cost.

Minimum Scheduling Proposal

While the details of this proposal are unclear, WAPA needs to ensure that the changes are coordinated with our scheduling agent and are acceptable to all parties.

Maintaining our existing crediting arrangement is of paramount importance to us. When the marketing plan is finalized, we would like to meet with you to understand how WAPA will fulfill our contractual obligations.

Thank you for the consideration of our comments.



Bo Mazzetti
President, San Luis Rey Indian Water Authority