

January 22, 2013

Via Email: JOT@wapa.gov

RE: Draft Recommendations of Joint Outreach Team (77 FR 224, November 20, 2012)

The following are comments of Utah Associated Municipal Power Systems (UAMPS) in response to the published recommendations of the Joint Outreach Team (JOT) Defining the Future Draft Recommendations in response to Secretary of Energy Chu's March 16, 2012 memorandum.

About UAMPS

UAMPS is a political subdivision of the State of Utah whose membership consists of 45 community-owned electric utilities located in Utah, Nevada, Arizona, New Mexico, Idaho, Wyoming, California, and Oregon, serving 293,000 end use customers in the West. Most UAMPS members own and operate a local electric utility system that provides integrated retail electric service to residential, commercial, and industrial customers. UAMPS partners with its members to ensure that electricity is affordable and reliable.

UAMPS currently operates 14 separate projects that provide power supply, transmission, and other services to participating members. UAMPS is also the Colorado River Storage Project power single purchasing agent for 30 members who rely on power generated and transmitted over CRSP delivery systems. On November 20, 2012, the Department of Energy (DOE)/Western Area Power Administration (Western) Joint Outreach Team, or JOT, issued 14 draft recommendations for implementation of DOE Secretary Steven Chu's March 16, 2012 memorandum describing several changes he intends to make to the PMAs. The JOT recommendations were issued following a public meeting-and-comment period, which included discussion forums led by the JOT, regarding the March 16 memorandum itself. Because of the significant role CRSP plays in our member's resource portfolio, UAMPS has spent considerable time participating in the "Chu Memo" process by attending public meetings and following the many activities resulting from the March 16 memo.

UAMPS is also a member of the American Public Power Association (APPA) and the Colorado River Energy Distributors Association (CREDA) and has participated with those organizations in following the issues and developing our comments regarding these JOT recommendations. UAMPS endorses the comments developed by APPA and CREDA. While not commenting on each of the 14 recommendations developed by the JOT, UAMPS will simply focus on those concepts our members have the greatest concerns.

Many of the recommendations refer to customers, stakeholders and tribes, which in describing the desired outcome are confusing as to who may be the intended beneficiaries of said recommendations. UAMPS strongly believes the federal preference customers, who are paying and have paid the costs of federal generating and transmission facilities should be given a higher standing than other so called stakeholders. Any recommendations should ensure that the associated costs are funded by the beneficiary/user and at the minimum hold the present preference customers harmless to any changes that might be made. Consequently, before finalization of any recommendation, Western should establish a body of preference customers representing all federal projects from which Western markets power to develop the ongoing principles being developed by the JOT.

In finalizing any JOT recommendations, Western must recognize that each federal project was authorized under separate and distinct authorities. As such, the rates established for each project is designed to cover specific costs unique to each project. WAPA should work with its customers on a project and regional basis, as appropriate to ensure that cost shifts and/or subsidies between or among projects do not occur. This comment applies generally to all of the JOT recommendations.

UAMPS appreciates the opportunity to provide these comments on the JOT draft recommendations. While many of the goals outlined by Secretary Chu in the March 16 PMA memorandum are important ones, the federal hydropower system was built in partnership with and paid for by the PMA customers. When considering these, and other, changes to this historic and vibrant system, UAMPS urges DOE to continue supporting this collaborative, historical partnership.

If you have any questions regarding these comments, please feel free to contact:

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