

ARIZONA TRIBAL ENERGY ASSOCIATION

Submitted Via Email to JOT@wapa.gov

January 22, 2013

Joint Outreach Team c/o

Anita J. Decker

Acting Administrator

Western Area Power Administration

P.O. Box 281213

Lakewood, CO 80228-8213

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

Dear Ms. Decker and JOT Members:

Please accept the following comments of the Arizona Tribal Energy Association ("ATEA") in response to the November 20, 2012 Joint Outreach Team Draft Recommendations ("Recommendations").

ATEA is a non-profit association presently comprised of the following Arizona tribal utility authorities: Ak-Chin Energy Services, the Tohono O'odham Utility Authority and the Gila River Indian Community Utility Authority.

General Comments

1. ATEA considers the tone of the Recommendations to be very broad without justification for that scope. As a result, ATEA seeks a modification of the Recommendations so that they consistently refer to and incorporate specific project requirements and customer groupings while observing applicable law and contract terms in place.
2. ATEA considers certain other aspects of the Recommendations to ignore the need for transparency from Western. Merged rates as proposed, for example, would only penalize any customer group paying lesser project costs in order to generate an equivalent benefit to a different customer segment otherwise paying more. The JOT fails to offer and ATEA cannot conceive of any justification for such an action and such a change, if implemented, would preclude all meaningful customer dialogue on Western's rate proposals due to the fundamental level of confusion introduced into the cost management of each project.

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3. ATEA seeks clarification from the JOT as to the specific benefits to be achieved from each proposal. No specific benefits are delineated, and, are especially noticeably absent with respect to agency cost savings. Changes leading to agency staffing reductions, for example, should be expressly set out for customer comment.

Specific Comments

1. OASIS

While ATEA recognizes the potential for efficiency improvements within OASIS, complete consolidation without any redundancy seems unwarranted and contradictory to NERC reliability assurance principles/requirements. ATEA encourages the JOT to identify the specific functions that can be “streamlined” or consolidated without a comprehensive retirement of all but one OASIS site in order to preserve a safety-based redundancy.

2. LGIP

ATEA considers this JOT Recommendation to be vague. For example, the Recommendation fails to include the basis for eliminating the feasibility study element of the interconnection study and Western further fails to indicate why site control demonstrations are not necessary; a desire for fewer process steps is not, by itself, a justification for the recommended modifications. As such, the JOT should provide clarifying justifications for each aspect of the LGIP Recommendations.

3. Transmission Rates and Services

Again, ATEA notes the JOT’s desire to consider consolidated rates and rate-setting methodologies without regard to project specifics, creating inequities and curtailing transparency in the agency’s dealings.

4. EPAMP

Western needs to clarify its intended scope of reform/revision in this instance to allow for fully responsive customer comment.

5. Infrastructure Investment Study

Western/JOT should revise this Recommendation to clarify that it will incorporate work already performed on this topic. ATEA further agrees with CREDA in its comment that “commercial” valuation of Western transmission infrastructure is not justified.

6. CTS

Again, Western/JOT must clarify that this Recommendation will not seek to co-mingle project costs. Also, the Recommendation should more specifically delineate the specific benefits justifying this action.

7. EPTC

ATEA members have had experience working with NREL but ATEA does not consider the Recommendations to substantiate the assignment of EPTC to NREL at this time without more detail justifying the transfer being made available.

8. EIM

ATEA supports the JOT’s proposal to study the benefits and costs of energy imbalance power marketing investigations with the involvement of tribes, presuming that the work is performed in the context of applicable regulatory parameters and relevant work already undertaken.

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9. Renewable Energy Liaison

ATEA recognizes the Western/JOT proposal to create a renewable liaison position at Western as relevant to Western's own Federal renewable requirements but seeks additional, specific justification for the functions of the position, for example as to how the position will integrate into existing daily operational and programmatic needs within the agency, be used for specific projects and assist associated customer groups.

Thank you for this opportunity to comment. ATEA looks forward to additional participation opportunities as the JOT process advances.

Sincerely,



Leonard Gold
President