



October 30, 2012

Via Electronic Mail to [JOT@wapa.gov](mailto:JOT@wapa.gov)

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Roseville, CA 95678  
(916) 781-3636  
[www.ncpa.com](http://www.ncpa.com)

Joint Action Team  
Department of Energy

Re: Request for Extending the Comment Period on the JOT's Draft Recommendations to the Secretary of Energy on the Future of the PMAs.

Dear Joint Action Team members:

I am writing you on behalf of the Northern California Power Agency (NCPA), a public power joint action agency that represents seventeen member communities and districts in Northern and Central California. NCPA and its members receive a significant portion of our power supply from the Western Area Power Administration (Western). Accordingly, we have a vested interest in the initiative kicked off by Secretary of Energy Steven Chu's March 16 memorandum on the future of the federal Power Marketing Administrations (PMAs).

The Joint Outreach Team (JOT) has previously indicated that it expects to release its draft recommendations early next month, to be followed by a thirty-day comment period. Given the significant impact the Secretary's initiative will likely have on NCPA, its members, and our ratepayers, we respectfully request that the public comment period for the JOT's recommendations be extended to ninety days.

Since the release of Secretary Chu's memorandum, we have repeatedly sought to share our concerns about the purpose, scope, and processes associated with the PMA initiative. Our efforts have included extensive participation in the stakeholder workshop and listening session held July 26 in Folsom, California, as well as the electronic submission of written comments.

Several of our elected representatives have also contacted the Department of Energy (DOE) to express their misgivings. Sixteen members of the California State Legislature, for instance, wrote Secretary Chu on July 6 urging that the initiative be replaced by a collaborative effort between DOE, Western's customers, and state agencies to identify areas where existing policies are falling short. Their letter points out that the State of California has been a leader on energy policy, and that the state's public power systems have been at the forefront of California's attempts to improve energy efficiency, build needed transmission, and develop renewable generation. Imposing duplicative requirements on them through Western would force California's ratepayers to pay twice.

To the best of our knowledge, this letter has not received a substantive response. Further, we have seen nothing indicating that the JOT or DOE have seriously or fully reviewed the potential for duplicating state policies and the cost implications for California ratepayers. Outstanding

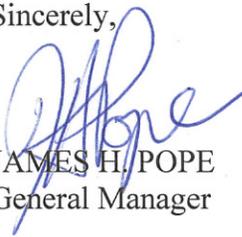
issues like these point to the need for extensive review and analysis of the JOT's draft recommendations when they come out in November.

The process leading up to this point has given us every reason to believe that these recommendations will include far-reaching proposals. While the JOT has taken months to develop these plans, customers are being given only thirty days to consider their implications – a period functionally shortened by the Thanksgiving holiday.

Western and DOE routinely provide ninety days or more for comment on far less significant proposals than those anticipated in November. We recognize that DOE has chosen not to adhere to formal rulemaking procedures here, but it is nevertheless troubling that it has imposed a comment period so out of step with its standard practices.

In order to provide all stakeholders in this process with a meaningful opportunity to review the JOT's recommendations, analyze their implications, and offer well-considered comments, NCPA respectfully requests that the JOT provide a ninety-day comment period on its draft recommendations rather than the thirty days currently allotted.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Pope", is written over the typed name and title.

JAMES H. POPE  
General Manager

JHP:dd  
12.13