Grand Canyon State Electric
Cooperative Association, Inc.
Your Touchstone Energy® Cooperatives

Sent via Email to: JOT@wapa.gov and adecker@wapa.gov

October 30, 2012

RE: Request for a Comment Period of at Least 60 Days on the JOT Draft Recommendations

On behalf of the members of Grand Canyon State Electric Cooperative Association ("GCSECA"), I am writing to request a comment period of at least 60 days on the Department of Energy ("DOE")/Western Area Power Administration's Joint Outreach Team ("JOT") draft recommendations to Secretary Steven Chu about the implementation of his March 16, 2012 Memo regarding the Power Marketing Administrations ("PMAs"). We believe a comment period of at least 60 days is necessary to allow those directly affected by the JOT's recommendations the opportunity to thoroughly evaluate the substance of the proposal and provide meaningful input. If the draft recommendations require significant technical, economic, or other complex analysis, we may seek additional time to ensure that our comments appropriately respond to the draft recommendations.

Throughout this process, GCSECA and its members have expressed deep concern about the assumptions made regarding the manner in which the PMAs operate. Additionally, we have been frustrated by a procedural process that has been unnecessarily rushed and lacking in true opportunity for meaningful input from preference customers and other stakeholders.

We understand that the JOT is currently in the process of combining input from the "Defining the Future" workshops, listening sessions, and written comments to formulate draft recommendations that will be published in the Federal Register for comment in early November. We look forward to the opportunity to submit comments. However, we are concerned that the comment period may be abbreviated due to holiday schedules, travel and other unforeseen variables. Given the technical nature of Secretary Chu's initiative and the potential economic impact of the proposal on preference customers and other stakeholder groups, a comment period of at least 60 days will allow those directly affected by the JOT's recommendations the opportunity to thoroughly evaluate the substance of the proposal and provide meaningful input to the DOE.

In addition to our request for a sufficient comment period, we strongly recommend that the Administration issue a Federal Register notice containing the final recommendations to the Secretary that discusses the comments DOE receives on the draft recommendations and explains why the JOT accepted or rejected those comments in developing the final recommendations. Only such a process, that tracks the requirements of the Administrative Procedure Act for formal rulemakings, will provide the transparency that DOE has said it supports in this process.

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GCSECA is a regional trade association whose members include six distribution electric cooperatives and two generation and transmission cooperatives headquartered in Arizona. These entities are: Duncan Valley EC, Duncan; Graham County EC, Pima; Mohave EC, Bullhead City; Navopache EC, Lakeside; Sulphur Springs Valley EC, Willcox; Trico EC, Marana; Arizona Electric Power Cooperative, Benson; and Southwest Transmission Cooperative, Benson. Together, the Arizona distribution cooperatives serve approximately 183,000 meters and an estimated 650,000 people in Arizona homes, farms, ranches and businesses.

Thank you for your consideration of our request.

GRAND CANYON STATE ELECTRIC COOPERATIVE ASSOCIATION

Tom Jones
Chief Executive Officer

cc: Kiel Weaver
Ashley Slater
David Fitzgerald
GCSECA Members