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Via Email: Joint Outreach Team: JOT@wapa.gov
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Salt River Project Agricultural Improvement and Power District (“SRP”), one of the nation’s largest public power utilities serving nearly one million electric customers in central Arizona, has been an active stakeholder in the efforts of the DOE/WAPA Joint Outreach Team (JOT) initiated earlier this year pursuant to Secretary Chu’s March 16, 2012 Memorandum on Power Marketing Administrations’ Roles. SRP participated in the “Defining the Future” Workshops and Listening Sessions held in Rapid City on July 17, 2012 and Phoenix on July 24, 2012, and provided written comments on the Workshops on August 17, 2012.

Since WAPA’s establishment, SRP and other WAPA preference customers have relied on WAPA to fulfill its statutory obligation to market and deliver hydropower from federal reclamation projects established pursuant to federal statutes at the lowest possible rates consistent with sound business practices. SRP believes that, if adopted, the Power Marketing Administration reforms proposed in Secretary Chu’s memorandum will bring many fundamental changes to WAPA’s system and functions on which so many entities and their customers depend. The importance of these issues and the concerns of WAPA’s preference customers is evidenced by the letter to Secretary Chu from 166 members of Congress, the number and variety of stakeholders at Workshops and Listening Sessions, and the more than 100 sets of comments received after Workshops from interested stakeholders – stakeholders that, like SRP, are very concerned with potentially dramatic changes to WAPA’s statutory mission.

SRP appreciates the efforts of the JOT to compile and review the numerous stakeholder comments submitted subsequent to the Workshops and to produce Draft Recommendations for WAPA’s future. However, SRP is greatly concerned by the JOT’s statement in its September 7 webinar that the JOT will publish its Draft Recommendations in the Federal Register in November, seek stakeholder input, and then finalize and submit Final Recommendations to Secretary Chu in December. This timeline is seriously insufficient (1) for stakeholders, especially preference customers who will be most directly affected by changes in WAPA’s responsibilities, to review and provide meaningful comments on the Draft Recommendations, and (2) for the JOT to review provided comments in a credible manner and reflect such comments in its Final Recommendations to the Secretary.

Therefore, given the critical nature of these recommendations for WAPA and their potential effects on SRP’s customers, SRP respectfully requests that entities be given a 90 day public comment period from the date of publication of the Draft Recommendations in the Federal Register. A comment period of 90 days is the minimum that transparency and due process would require, given the significant number of hours that preference customers and stakeholders have devoted to the Workshops, Listening Sessions, and webinars, and given the extensive record that has been prepared as a result of those efforts.

Sincerely,

/s/ Robert R. Taylor

Senior Director
Regulatory Policy and Public Involvement