8:30 a.m. on Oct. 30, 2006

Richard Reynolds, Manager Lost River Electric Cooperative Mackay, Idaho (208) 588-3311

It's really quite simple:

- 1. We are a very slow growing utility.
- 2. Most of our sales are to irrigators, as much as 60-65 percent in a given year. Our annual sales swing dramatically based on irrigation sales.
- 3. The concern for us is that as we move forward understanding that our allocation will be based on a high water mark that we're targeting one year, 2010, which could swing one way or another dramatically (as much as a 20-30 percent swing) depending on weather and moisture.
- 4. It is my understanding that some form of weather normalizing may be considered. I believe if weather normalizing is determined by temperature and there is no consideration for moisture, etc., given our historical load swings, our high water mark could substantially miss the intended BPA mark.
- 5. Consequently, my feelings are that there should be some kind of mechanism for finding a balance of fairness for mine and other similar utilities. Some average that is more representative of what we use over the years because of my concerns with the large swings of irrigation sales in any one year.