ARIZONA TRIBAL ENERGY ASSOCIATION

Sent Via Electronic Mail to: CRSPMCadj@wapa.gov

March 13, 2008

Ms. Carol Loftin Rates Manager Western Area Power Administration CRSP Management Center 150 East Social Hall Ave., Suite 300 Salt Lake City, UT 84111-1580

RE: January 4, 2008 Federal Register Notice Regarding Rate Order No. WAPA-137 FY 2009 SLCA/IP Rate Adjustment

Dear Ms. Loftin:

The Arizona Tribal Energy Association (ATEA) on behalf of its members (Ak-Chin Energy Services, Gila River Indian Community Utility Authority, Navajo Tribal Utility Authority and Tohono O'odham Utility Authority) submits the attached first Request For Information (RFI) to the Western Area Power Administration (Western) regarding the proposed rate increase for the Colorado River Storage Project (CRSP). ATEA would appreciate the responses being sent electronically to Mr. Leonard Gold at lgold@utility-strategies.com. If electronic responses cannot be sent, please mail the hard copy responses to the address shown below. Upon ATEA's review of the responses to this RFI, ATEA may submit additional RFIs.

Additionally, ATEA intends to provide written comments prior to the close of the public comment period. It is ATEA's understanding that at Western's Public Information Forum held March 4, 2008 in Salt Lake City the close of the public comment period was to be extended from April 3, 2008 to May 5, 2008. In the event that Western is unable to provide responses to this RFI at least two weeks prior to the current deadline, ATEA respectfully requests that the public comment period be correspondingly extended.

ATEA appreciates your timely response to this and all future RFIs. Also, please include ATEA on Western's list for mailings or emails received or sent by other parties regarding this matter.

ARIZONA TRIBAL ENERGY ASSOCIATION

RE: January 4, 2008 Federal Register Notice Regarding Rate Order No. WAPA-137 FY 2009 SLCA/IP Rate Adjustment

March 13, 2008

ATEA thanks Western in advance for its prompt response to this inquiry. If you have any questions please contact me by email or telephone at 480-731-9506.

Sincerely,

Leonard S. Gold, President

Arizona Tribal Energy Association

Cc: ATEA Members

Amy Mignella, ATEA Administrator

ARIZONA TRIBAL ENERGY ASSOCIATION (ATEA)

Request For Information #1 (ATEA-RFI#1)
Regarding Rate Order No. WAPA-137
FY 2009 SLCA/IP Rate Adjustment

- ATEA-RFI#1-1. Please provide copies of all documents and information that was used to develop the cost basis for the Operations and Maintenance (O&M) component of the new rate include in the Power Repayment Study (PRS).
- ATEA-RFI#1-2. What is the basis for the cost of living adjustment included for the Bureau of Reclamation? Is this authorized across all federal positions, across all DOI positions, throughout the Bureau of Reclamation, etc.?
- ATEA-RFI#1-3. On what basis other than historic practice or internal agency opinion does Western justify inclusion of continued apportionment funds for non-authorized projects in the PRS?
- ATEA-RFI#1-4. Please run the PRS and provide the results excluding the funds categorized as "Available W/Appor" found behind Tab 19 of the Colorado River Storage Project Management Center Supporting Documentation For Proposed Rates: SLCA/IP Firm Power, CRSP Transmission & Ancillary Services dates January 2008 on the sheet titled "Colorado River Storage Project, Aid to Participating Projects Irrigation Repayment Obligations and Apportioned Revenue Applied" totaling \$642,582,791.00, which are not tied to authorized projects.
- ATEA-RFI#1-5. Please explain on what basis Western could extend the repayment periods for authorized projects such that rate impacts of repayment obligations are reduced.
- ATEA-RFI#1-6. Provide the CRSP Work Plans for the fiscal years 2006, 2007 and 2008, if available.
- ATEA-RFI#1-7. Provide a copy of the "Supporting Documentation" for the previous CRSP rate process that supported the development of the current rates.

Request For Information #1 (ATEA-RFI#1) Regarding Rate Order No. WAPA-137 FY 2009 SLCA/IP Rate Adjustment

- ATEA-RFI#1-8. Provide a detailed breakdown of both Western's and the Bureau of Reclamation's O & M expenses for the last 3 fiscal years (FY 2005, FY 2006 and FY 2007). This detailed breakdown should, for example, show costs by function, i.e. system wide expenses, power marketing, transmission, labor and operating costs of Glen Canyon Dam, number of FTEs, security costs and charges from regional and Denver offices. This detail should tie to the amounts shown for both Western and the Bureau and the worksheets captioned Operation & Maintenance in the "Supporting Documentation."
- ATEA-RFI#1-9. Based upon information contained in the "Brochure for Proposed Rates:"
 - ATEA-RFI#1-9.1. Pages 6 and 8 of the Brochure references the "rate setting period" of 17 years as opposed to 20 years. Please explain why a different rate-setting period was used. Are the current rates in effect based upon a 20-year rate-setting period?
 - ATEA-RFI#1-9.2. Provide a copy of the Brochure relied upon for the current rates that are in effect.
 - ATEA-RFI#1-9.3. Regarding the Cost Recovery Charge and the example shown on page 14 of the Brochure, does the calculation of annual expenses include other revenues as an expense offset or are they included in total revenues?
 - ATEA-RFI#1-9.4. With regard to Project Use revenues, where on Table 3 do they appear? If they are not included as other revenues please explain.