



UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS

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November 15, 2007

Ron Horstman  
Energy Services Specialist  
Western Area Power Administration  
PO Box 281213  
Lakewood, CO 80228-8213  
Via email: [horstman@wapa.gov](mailto:horstman@wapa.gov)

Dear Mr. Horstman:

Utah Associated Municipal Power Systems (UAMPS) representing 30 municipal electric systems and special districts purchasing power generated from the Colorado River Storage Project thanks you for the opportunity to comment on Western's August 21, 2007 Federal Register notice on the proposed rulemaking regarding the Energy Planning and Management Program – Integrated Resource Planning Approval Criteria

Western has proposed three changes to its regulations:

1. approval of IRPs for member based associations (MBA);
2. approval for regional IRP participation; and
3. release of customer IRP information

UAMPS offers the following comments regarding Western's August 21 Federal Register notice:

**Approval of IRPs for member based associations** – UAMPS agrees that approval of MBA IRPs by the MBA governing body is appropriate and avoids unnecessary and duplicative efforts. The responsibility for the MBA IRP lies with the governing body of the MBA.

**Approval for regional IRP participation** – UAMPS does not object to Western's proposal to encourage voluntary customer participation in regional Integrated Resource Plans.

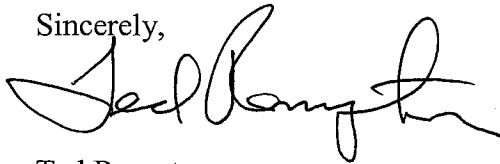
**Release of customer IRP information** – UAMPS is concerned with the proposal release customer information in such locations as Western's website. While the current distribution of customer information is problematic, we believe the current proposal may allow the release of customer's proprietary information. We

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suggest Western only post IRP information for those customers requesting such information to be disclosed. Further, since UAMPS members are public entities, non proprietary information is available to the public upon request. We suggest Western proposal be modified to consider the fact that most public entities are required to provide information when requested. In this manner, customers may make the determination of what information is proprietary, not Western.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Rampton". The signature is fluid and cursive, with a large initial "T" and "R".

Ted Rampton  
Manager of Government Affairs