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106
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October 20, 2014

Chairman and Members of the Commission
of the Arizona Power Authority and
Michael Gazda, Acting Administrator
1810 West Adams Street
Phoenix, Arizona 85007

Re: Comment on Proposed Resolution

Dear Chairman, Members of the Commission and Mr. Gazda:

On behalf of the Avra Valley Irrigation District, the Cortaro-Marana Irrigation District and the Mohave Valley Irrigation and Drainage District, our office provide the following comment to the proposed resolution to be considered and adopted on October 21, 2014 at your noticed meeting.

Under your paragraph two of the resolution The Commission is proposing to discriminate. The resolution directs consultants not to consider an allocation methodology that provides special consideration to agricultural uses in the post 2017 marketing process.

In effect, if Apple or Intel owns a District, that District is entitled to file for an allocation for Hoover and the consultant would use the electrical load of the District. Even if there is no irrigation or agricultural irrigation.

Likewise, since it is the tendency of many districts to expand their non-irrigation and non-agricultural loads in order to build a statistical database for making an application for Hoover under Arizona Revised Statutes under section 30-125(a), such statistics will tend to obscure and hide the fact that allocation methodology is being adopted which does not take into account the true nature and extent of the need of irrigation and irrigated agriculture for allocation.

Chairman and Michael Gazda

October 17, 2014

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This is contrary to the intent of the Arizona Revised Statutes and presents a misleading statistical analysis for the Commission to use in its subsequent decision making on its allocations.

Very truly yours,

By 

Michael A. Curtis, Special Counsel for
Avra Valley Irrigation District
Cortaro-Marana Irrigation District
Mohave Valley Irrigation and Drainage District

Cc: Clients