



October 1, 2014

Mike Gazda, Executive Director  
[mike@powerauthority.org](mailto:mike@powerauthority.org)

Re: Comments pertaining to "Draft Application for Post-2017 Hoover Allocation Request"

Dear Mr. Gazda:

The backgrounds of existing Hoover A customers, Electrical Districts No. 2, 3, 4 & 5 of Pinal County, Arizona ("Districts"), have been well documented before the Authority and will not be repeated here. Fundamentally, these Districts believe the Draft Application requests appropriate and necessary information and should require the additional documentation being considered under Section 7 ("Power Usage History") and Section 8 ("In-Lieu Water Use").

Procedurally, the Districts believe there should be two forms of applications. The first, for those applicants only seeking a Hoover Schedule A or B allocation, and the second form for those seeking a Hoover D2 allocation. As made clear in the 2011 Federal Act, and in Mr. Somach's conclusions in his Issue Paper, applicants can not legally be allowed to receive a Hoover A/B allocation and also a D2 allocation. By bifurcating the form of application this matter is managed on the front end of the process.

The Districts appreciate the continuing opportunities to participate in the process of developing policies, procedures and application forms for the allocation of this critically important resource.

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Salmon, Lewis & Weldon, P.L.C.  
For Electrical Districts Nos. 2, 3, 4, and 5