

## Michael A. Gazda

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**From:** Michael A. Gazda  
**Sent:** Wednesday, October 1, 2014 11:28 AM  
**To:** Stuart Somach; 'Brittany Lewis-Roberts'; Mike Powell (MPowell@ucseng.com)  
**Cc:** 'sbrophy@pagelandco.com'; Douglas V. Fant (doug@powerauthority.org); 'Marcia K. Kennedy'; 'Susan Angulo'  
**Subject:** FW: Comments on Draft Application

**From:** Robert S. Lynch [mailto:RSLynch@rslynchaty.com]  
**Sent:** Wednesday, October 1, 2014 10:13 AM  
**To:** Mike Gazda (mike@powerauthority.org)  
**Cc:** Robert S. Lynch; Todd Dillard  
**Subject:** Comments on Draft Application

Mike:

The following are IEDA's comments on the Draft Application developed by Somach Simmons & Dunn and Mike Powell of UC Synergetic, LLC.

The workshop revealed that the Draft Application cannot be finalized without the Commission making a number of policy decisions. The proposed schedule presents an opportunity for customers and others to provide additional comments on these important policy issues. Thus, finalizing the application must await receipt and consideration of those comments in order for the Commission to have the full benefit of those comments, many of which have not yet been, or not been fully, addressed. This is critical to entering the formal process correctly.

We note a few of these policy questions below.

On page 2, how will agricultural load be defined? Should agricultural load even be considered in the application?

On page 3, should other federal hydropower contracts be taken into account?

On page 7, etc., what is "in lieu water" and how should it be treated?

On page 11 (#11), what schedule(s) will new applicants be eligible to apply for? What schedule(s) will existing customers be eligible to apply for?

The above examples clearly demonstrate the need for the Commission to consider policy comments and make at least initial determinations in order to finalize the application.

Thank you for the opportunity to comment on this Draft Application.

Sincerely,  
Bob Lynch

cc: IEDA Presidents/Chairmen and Managers  
Sam Lofland  
Mark McGinnis

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