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MUNICIPAL UTILITIES DEPARTMENT

September 29, 2014

Mike Gazda
Interim Acting Executive Director
Arizona Power Authority
1810 West Adams Street
Phoenix, Arizona 85007

RE: Comments on draft application for Post - 2017 Hoover Allocation Process

Dear Mr. Gazda:

Thank you for the opportunity to comment upon the draft application.

- 1). We concur with other commenters that requested a manual or detailed instruction sheet for filling out the final application.
- 2). Schedule D is inherently different than Schedules A or B. We recommend a separate application for Schedule D similar to the application used by Western. If APA decides to not develop a separate application, at least include a statement explaining what sections need to be filled out to apply for Schedule D power.
- 3). If there are specific legal requirements for any requested information, please consistently include the appropriate citations on the relevant part of the application.
- 4). We recommend against subdivided classes for Schedule D power. Like the pizza analogy used in the September 29 meeting, Schedule D is a commodity in its own right and should not be marketed as any additional separate subclasses.
- 5). In terms of historic power and water load documentation, we recommend requiring actual monthly data for the past five years. This is a more straightforward approach that eliminates the need for applicants to determine their peak months, and provides APA with useful information on the variations in an applicant's loads.
- 6). Rather than use the backwards calendar approach, we recommend using calendar year data with December 2014 being the most recent data included in the application.
- 7). In Section 9, please unbundle power allocation from the delivery points. This will allow more flexibility for municipal allottees and power wheeling agreements.

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975 East Armstrong Way
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8). In terms of documenting end users of services provided by the applicant, we recommend allowing Municipal Water Systems to use the data and categories of users required for annual reports to the Arizona Department of Water Resources.

We appreciate the opportunity to comment. If you have any questions on these comments please contact me at 480-782-3663, or robert.goff@chandleraz.gov.

Sincerely,



Robert A. Goff, R.G.
Utility Analyst
Municipal Utilities Department
City of Chandler, Arizona