

MEMORANDUM

TO: Arizona Power Authority
FROM: Somach Simmons & Dunn
SUBJECT: Revised Draft Application for Post-2017 Hoover Allocation Process & Responses to Comments
DATE: November 3, 2014

I. INTRODUCTION

As part of the Preliminary Process, the legal and technical consultants (Somach Simmons & Dunn and Mike Powell, of UC Synergetic) (collectively the “Consultants”) for the Arizona Power Authority (Authority) developed a draft application for electric service, which was posted to the Authority’s website on September 19, 2014. The draft application was the subject of a Consultant’s Workshop held on September 29, 2014. Interested parties also submitted written comments on the draft application. Here, the Consultants summarize and respond to the comments, and attach a revised draft application.

Voluntary Data Request

The Proposed Timeline for the Preliminary Process, dated October 17, 2014, states that the Consultants may request that interested parties submit voluntary data that reflects the requirements in the revised draft application. For those interested parties that voluntarily submitted data to Mike Powell in Fall 2013, it is likely that these parties have since consulted with Mike Powell and provided data that is consistent with the draft application form. If that is the case, then an additional response is not necessary, and Mike Powell will continue to work with the voluntary data that he has obtained from these potential applicants.

For those potential applicants that have not voluntarily submitted data, or would like to submit new or revised data consistent with the revised draft application form, the Consultants encourage these potential applicants to fill out the revised draft application form as complete as possible, and return it to Mike Gazda at mike@powerauthority.org by **November 19, 2014**. This request is voluntary and for informational purposes only. It does not represent the initiation of the Formal Process. However, data provided through this informal, voluntary process is extremely useful as the Consultants continue to develop allocation methodologies for the Commission to consider once the Formal Process begins.

Responding to this informal request is also beneficial as the exercise solicits questions that can be resolved prior to the initiation of the Formal Process.

Potential applicants should contact Mike Gazda at the Authority (mike@powerauthority.org), or Mike Powell, the Authority's technical consultant (MPowell@ucseng.com), if they have any questions, including whether to respond if they have already provided data to Mike Powell, or questions on the revised draft application form.

II. RESPONSE TO COMMENTS

General

Comment 1: It is difficult for the Consultants to provide enough space on their forms for the applicant's response to each data request. The application should be provided in a fillable PDF file, so that the applicants can fill in the information and then electronically transmit the completed form to the Authority.

Response: The Consultants are willing to present the final application in a fillable PDF form although this does not necessarily resolve the issue of sufficient space to respond to each request. Regardless of whether the final application is electronic, there will likely be a need for some applicants to submit information on a separate sheet.

Comment 2: The Authority should require that all substantive data concerning power or water usage loads or resources be substantiated using the most credible and informative documentation reasonably available to the applicant from whatever sources.

Response: This is a decision for the Commission. The current draft application includes alternative language for both possibilities.

Comment 3: Certain policy decisions should be reached and decided by the Commission before the application form is finalized. For example, the Commission should decide whether applicants can receive both post-2017 Schedule D power and post-2017 Schedule A or B power. If the application form is to provide a checkbox for each of the three schedules, it should contain a clear and concise notice that requests for Schedule A or B will not be considered from recipients of a Schedule D-1 allocation from Western; requests for Schedule D-2 will not be accepted from current customers; and allocations of both Schedule D-2 and Schedule A or B will not be made to the same applicant. Another example is that the Commission could confirm that there is insufficient Schedule A power to satisfy the requests from qualified Districts, and that requests for Schedule A from applicants in the lower preference categories will not be considered.

Response: The Consultants agree that the Commission should resolve certain policy decisions as early as possible. At least with respect to some issues, the Commission

has, in fact, begun that process. At the October monthly meeting, the Commission proposed a resolution on two policy issues (agricultural load and pumping equivalent load), but decided to postpone formal action until the November monthly meeting. The Consultants, however, cannot wait until the Formal Process begins to proceed with the development and finalization of the application form. If they do so, it will simply be too late solicit comments on an application form. The current draft application includes alternative language to address sections that may change depending a policy decision.

Comment 4: It would be more efficient to have two alternative application forms: one for Schedule D and one for Schedule A or B.

Response: The Consultants do not agree that there should be two application forms for Schedule D and Schedule A or B. The information requested is relevant to evaluating requests for Hoover power regardless of the applicable schedule.

Comment 5: The draft application explicitly asks whether an applicant is requesting D-2/A or D-2/B power. The implication of this distinction is that a portion of the power will be allocated under Title 30 while a portion will be allocated under Title 45. The Authority should not subdivide Schedule D power. Congress did not intend this result, which gives preferential treatment to a certain class of customers.

Response: The Consultants have received many comments on the preliminary conclusion that D-2 power must be subdivided for further allocation under Titles 30 and 45, and this issue will be further addressed in the Revised Draft Plan. For purposes of this draft application, the distinction between “D-2/A” and “D-2/B” is not necessary. The revised version simply lists “D-2.”

Comment 6: There should be a manual or detailed instruction sheet for filling out the application.

Response: Prior to the initiation of the Formal Process, the Consultants intend to hold a workshop to work with potential applicants and resolve questions related to how one should fill out sections of the application.

Comment 7: If there are specific legal requirements for any requested information, appropriate citations should be included in the relevant part of the application.

Response: The Consultants concur and will note if there are specific legal requirements for any requested information.

Section 3: Boundary Information

Comment 8: Existing Schedule A customers may not need to obtain a new power purchase certificate if their boundaries have not changed since 1987. If this is the case, then this section should be deemed “not applicable” or “optional” for existing Schedule A customers.

Response: It is not clear yet whether existing Schedule A customers will be required to obtain a new power purchase certificate; at least some of the certificates expire with the termination of the post-1987 power sales contracts. The Authority has not yet decided how to address this issue. Regardless of the power purchase certificate requirement, a description of the applicant’s boundaries is relevant information for the Commission to consider in the allocation process.

Section 4 & Section 5: Electric and/or Water Services Provided (Percentage & Description)

Comment 9: The percentage of electric or water service provided to each use should be calculated on the system peak day. However, it is unclear which year or the number of years that should be used for the calculation. It is recommended that the reported percentage be calculated based on an average of the percentages for the system peak days for the five years prior to the date of application.

Response: Sections 4 and 5 were intended to solicit the necessary information to develop an allocation methodology based on agricultural load. At the October 21, 2014 monthly meeting, the Commission discussed a proposed Resolution 14-7, which if adopted, would direct the Consultants not to consider or develop an agricultural load methodology because “agricultural load” is already dealt with in the statutory preferences that govern the Authority’s allocation of Hoover power. The Commission, however, did not adopt or take formal action on Resolution 14-7, and indicated that it would take action at the next monthly meeting on November 18, 2014. Nonetheless, for now, sections 4 and 5 have been deleted from the draft application. If it is necessary at a later date, the sections can be added back in, and these comments will be addressed.

Comment 10: A definition for “agriculture” is needed.

Response: See Response to Comment 9.

Comment 11: The usage classifications should be standard throughout the application. One section asks for “agriculture” whereas another asks for “irrigation pumping.” At minimum, the agricultural use classification needs to be defined and standardized for all purposes of the application.

Response: See Response to Comment 9.

Comment 12: The draft application does not specify the period for the “system peak day.” Is this the last calendar year, preceding twelve months, three-year average?

Response: See Response to Comment 9.

Comment 13: The reference to “system peak day” is used to request load information. This appears to mean the demand associated with each class of electric customer. Most electric utilities do not demand meter their residential and small commercial customers. The system peak day is known for the entire electric system but not for each individual class of customer. The Authority will have to offer acceptable methodologies for utilities to determine the peak demands of each class of customer at the time of system peak.

Response: See Response to Comment 9.

Section 6: Power Supply

Comment 14: It is highly unlikely that operations of the Colorado River Storage Project (CRSP) will ever return to a release pattern that would allow the CRSP to provide the contract levels of power and energy to its customers. Only CRSP power and energy designated as “Sustainable Hydro Power” (SHP) is received, which is substantially less than the contract rate of delivery amounts. It is recommended that the Authority only use the amounts of CRSP power and energy actually made available to CRSP customers, which would be the SHP amounts.

Response: At this time, the Consultants recommend that the contract rate of delivery be requested in the application. The SHP represents Western’s minimum contractual commitment to its CRSP customers. Current CRSP contracts run until 2024, and in some future years, Western may deliver more power than these minimum commitments. The Authority must account for this federal power that may be available to an applicant in the post-2017 period.

Comment 15: The term “Nameplate Energy” is not a familiar term and should be further explained. It is suggested that “Nameplate Energy” be replaced with “Annual Net Generation for X Year.”

Response: “Nameplate Energy” has been replaced with “Annual Energy (Year).”

Section 7: Power Usage History

Comment 16: Salt River Project customers do not receive their monthly bill until as many as 20 days after the end of the preceding calendar month. The 24-month period of load data should end 60 days before the application deadline in order to allow the receipt of power bills and allow reasonable time to incorporate the last power bill in the application. Also, it is

recommended that the power and energy load data for the past five calendar years of 2010 through 2014 be required to be submitted.

Response: The Consultants concur. The footnote in the draft application has been revised to state that the 24-month period should begin with the month that is 60 days prior to the application deadline. For example, if the application deadline is April 1, 2015, then “month 1” of the preceding 24-month period should be January 2015.

Comment 17: Power usage history should be based on the preceding two calendar years to allow for accurate reporting.

Response: Section R12-14-202(A)(5) of the Arizona Administrative Code requires a statement of usage or sales data for the preceding 24-month period. The Consultants recommend an additional three years of data on peak monthly capacity and energy to produce a representative average of an applicant’s load.

Comment 18: The Authority should require 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 the Authority with useful information on the variations in an applicant’s loads.

Response: The Consultants recommend a total of five years of data to produce a representative average; however, the relevant number is the peak monthly load, which represents one month of the year. Section R12-14-202(A)(5) of the Arizona Administrative Code requires monthly data for the 24-month period preceding the date of the application. It is not necessary to ask for an additional 36 months to obtain the relevant data for peak months in years 3, 4, and 5.

Comment 19: The Authority should use calendar year data with December 2014 being the most recent data, instead of the backwards calendar approach.

Response: Section R12-14-202(A)(5) of the Arizona Administrative Code requires monthly data for the 24-month period preceding the date of the application. Although calendar year data would be marginally easier to organize, the Authority cannot ignore that data will likely be necessary for January 2015 and perhaps February 2015, assuming that the Authority initiates the Formal Process in March or April of 2015. If the Authority initiates the Formal Process in March 2015, then the first month of available data may be December 2014, in which case the required data will align with the calendar year. In any event, the dates for each field will be clearly marked in the final application.

Comment 20: Most electric utilities do not demand meter their customers. The system peak day is known for the entire electric system but not for each individual class of customer. The

Authority will have to offer acceptable methodologies for utilities to determine the peak demands of each class of customer at the time of system peak.

Response: Section R12-14-202(A)(5) of the Arizona Administrative Code requires monthly *usage* or *sales* data for the 24-month period preceding the date of the application, divided into reference classifications used by the applicant or recognized in the electric utility industry. Smaller utilities may not have *usage* data for individual customers. These utilities should have *sales* data for the reference classifications that the applicant uses. The revised application includes new directions on how an applicant may fill out the reference classifications.

Comment 21: The Central Arizona Water Conservation District (CAWCD) has four categories of water deliveries: municipal/industrial, agricultural, Indian, and surplus/recharge. CAWCD requests guidance on how it should classify these categories to fill out Section 4 as well as Section 7 and the Attachment.

Response: Section R12-14-202(A)(5) of the Arizona Administrative Code requires that the monthly usage or sales data be divided into reference classifications. The reference classifications may be those listed in the regulation, or “other classifications used by the Entity or recognized in the electric utility industry.” If CAWCD or another applicant has different, but clearly delineated classifications that it uses consistently in its operations or rate structure, then it is acceptable to report those classifications as “other.” In the revised application, there are multiple fields for “other” as well as a new section to provide an explanation for the reference classifications reported in the attachment.

Comment 22: To document end users of services provided by the applicant, the Authority should allow municipal water systems to use data and categories of users required for annual reports to the Arizona Department of Water Resources.

Response: See Response to Comment 21.

Section 8: In Lieu Water Use

Comment 23: If an average of five years is going to be used for actual data, then an average of five years must be used for “normalized” data.

Response: The draft application has been revised to ask for five years of pumping equivalent load.

Comment 24: Load data used as the average of 12 months does not accurately depict an entity’s maximum demands to be served by Hoover Power. Twelve-month coincident peaks should only be used to allocate total generation resources. Hoover Power is a summer-peaking generating resource. The average demand for 12 months will be much lower than the

average demand during the four peak summer months of June to September. It is recommended that the Authority use “normalized” peak demands for allocating Hoover “A” power as calculated by using the average of the highest demands in each of the four summer months of June through September, averaged over five years.

Response: Although a four-month average from June to September would be representative for some entities that peak in the summer, not all of the potential applicants are summer-peaking. The draft application has been revised to ask the applicant to provide a pumping equivalent load for the same peak month that the applicant reported in the previous section. That is, if in the “Power Usage History” section, the applicant states that June 2014 was the peak month for actual load, then in the “Pumping Equivalent Load” section the applicant should provide its pumping equivalent load for June 2014. This section has also been revised to allow the applicant to provide the pumping equivalent load for the peak month, and then explain how it arrived at that number. The application no longer has multiple fields for surface water reporting or monthly average. For those applicants that are unsure how to calculate pumping equivalent load, the Consultants will prepare a handout and will be available to answer questions at the tentative workshop described above, as well as at other times.

Comment 25: The sections on in lieu water use are of limited application to communities that use surface water delivered by the CAP.

Response: If the applicant does not have non-permanent, non-groundwater water supplies, then it is not necessary to fill out the pumping equivalent load section.

Section 9: Desired Points of Delivery

Comment 26: During previous Commission meetings, there has been discussion regarding unbundling transmission charges from the energy charges. CAWCD supports this option as it could substantially reduce its total transmission expenses. This issue needs to be addressed prior to the formal allocation process.

Response: The Commission is in the process of accepting and considering comments on the issue whether to unbundle transmission.

Comment 27: Unbundling power allocation from the delivery point will allow more flexibility for municipal allottees and power wheeling arrangements.

Response: See Response to Comment 26.

Comment 28: The Town of Fredonia incurs significant transmission losses between its load center and its point of delivery. Each application should be required to show loads at its load center and the loads at the point of delivery. A customer with substantial transmission losses

will require a larger contract rate of delivery to meet its load than most customers who have rather minor transmission losses.

Response: The draft application states that “Load data should be from the high side of the delivery point of Hoover power.” Reporting from the high side of the delivery point allows an applicant to adjust for transmission losses according to the relevant factor. If the losses are more substantial than normal, then the applicant can provide an explanation in an attachment to the application.

Attachment: Preceding 24 Months of Data

Comment 29: It would be easier for the Consultants and the applicants if the data for the five calendar years were submitted to the Authority in a chronological monthly order. The attachment should be revised to indicate whether the load data is being presented in a chronological monthly order, or reverse chronological order working backward from the deadline date.

Response: When the final application deadline is known, the Consultants will fill in the placeholders with actual dates. Regardless of whether the months or years are presented in chronological or reverse chronological order, the final application will be clearly marked.

REVISED DRAFT 2017 Hoover Allocation Request
REVISED DRAFT Application for Electric Service

This is a Draft Application. The Arizona Power Authority has NOT initiated any allocation process. This draft document is intended to facilitate comments from interested parties.

On _____ the Arizona Power Authority decided that a supply of Long term Power is available pursuant to section R12-14-201(A) of the Arizona Administrative Code. Under section R12-14-202 of the Arizona Administrative Code, a Qualified Entity that desires to purchase Long-term Power must file a written Application for Electric Service.

Please fill out the application completely. If there is not enough room on this form, please attach the information using a separate sheet. Missing, erroneous, or incomplete information will lead to a delay in processing your application and could possibly cause your application to be denied. Please return the completed form no later than _____. All information collected will be used to determine final allocation amounts according to the methodology approved in the Final Marketing Plan for Post 2017 Hoover Power. For questions please contact Mike Gazda, Interim Executive Director, Arizona Power Authority (email: mike@powerauthority.com Phone: (602) 368-4265).

1. Entity Information

Name: _____ Authorized Representative: _____
Address: _____ Phone: _____
Email: _____ Fax: _____

Year Entity Formed _____
Are you currently a customer of the Arizona Power Authority? Yes No
If no, were you ever a customer of the Arizona Power Authority? Yes No
Did you apply for Hoover Power for the post-1987 period and not receive an allocation? Yes No

2. Entity Type

District Type of District _____
 Municipality
 Other Governmental Agency Type of Agency: _____
 Electric Cooperative
 Water Users Association
 Corporation
 Business Trust
 Partnership
 Individual
 Federal Indian Tribe, Name of Indian Tribe: _____
or agency thereof

3. Boundary Information

Please provide information on the boundaries of your service area. Indicate in which form you are providing this information:

- Legal Description
- GIS Shapefile
- Map

4. Power Supply

Please provide information regarding your existing power supplies.

In accordance with section R12-14-201(k), list all sources of Power available from the Federal Government.

Project	Capacity (kW)	Energy (kWh)	Contract Term
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

List all non-federal power contracts for electric service.

Provider	Description (e.g., supplemental supply, etc..)
_____	_____
Capacity (kW)	_____
Energy (kWh)	_____
Contract Term	_____

Provider	Description (e.g., supplemental supply, etc..)
_____	_____
Capacity (kW)	_____
Energy (kWh)	_____
Contract Term	_____

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Provider _____

Description (e.g., supplemental supply, etc.)

Capacity (kW) _____

Energy (kWh) _____

Contract Term _____

Provider _____

Description (e.g., supplemental supply, etc.)

Capacity (kW) _____

Energy (kWh) _____

Contract Term _____

List all contracts for the sale of power to wholesale customers (i.e., sales for resale or distribution) in your service area.

Purchaser _____

Description

Capacity (kW) _____

Energy (kWh) _____

Contract Term _____

Purchaser _____

Description

Capacity (kW) _____

Energy (kWh) _____

Contract Term _____

List all generation sources owned (partially or wholly) by entity.

Type	Nameplate Capacity	Annual Energy (Year)	% Owned
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Power Usage History

As part of the application, section R12-14-202(A)(5) of the Arizona Administrative Code requires a statement of your kilowatt and kilowatt-hour sales or usage during each of the 24 months immediately preceding the date of the application, divided into reference classifications, such as residential, commercial, irrigation pumping, industrial, public use, or other classification that you may use or that is recognized in the electric utility industry. In addition, the Arizona Power Authority is requiring load information (peak monthly load and annual energy) for the three calendar years preceding the 24-month period immediately preceding the date of application.

[If APA decides to require substantiated data] Data reported in this section must be substantiated with documentation. An example of acceptable documentation would be power bills generated by the applicant for its customers, or generated by a third party. Failure to provide documentation could delay the application process and possibly prevent the applicant from receiving consideration for an allocation.

[If APA decides not to require substantiated data] Documentation to substantiate the data reported in this section is not required as part of the application, but should be available to supply to the Arizona Power Authority upon request.

In the Attachment to this application, please submit data for kilowatt and kilowatt-hour sales or usage for each of the 24 months immediately preceding the date of the application, divided into reference classifications, such as residential, commercial, irrigation pumping, industrial, public use, or other classifications that you may use in your operations or rate structure or that is recognized in the electric utility industry. Explain any assumptions you used to interpret the different listed classifications. If your customer classifications do not conform to the categories listed, report your operative classifications under "other" and explain the basis for the specific classification. For example, "the load reported under 'other' represents sales of water for groundwater recharge," etc. In addition, section R12-14-202(A)(5) of the Arizona Administrative Code provides that the statement of the applicant's kilowatt and kilowatt-hours may be for *sales* or *usage*. Please explain if you are reporting *usage* data or *sales* data. For example, a water district's *usage* data may strictly be limited to the load needed to deliver water. However, the water district's *sales* data may be categorized according to different classes of customers, e.g., municipal, industrial, agricultural, etc. Either data are acceptable. If you do not have data that meet these descriptions, then provide your best estimate for each classification using the information you have for your customer base, including rate information or annual reports to regulatory agencies.

Using this information for the preceding 24 months, report in this section the total monthly load and energy, divided into reference classifications, for the peak month for Year 1 (months 1-12)¹ and for the peak month for Year 2 (months 13-24). Provide the information for the peak month for Year 1 (months 1-12) below. Load data should be from the high side of the delivery point of Hoover power. If you have more than one delivery point for Hoover power, use the highest hour of coincidence of all aggregated delivery points.

Year	Peak Month	Capacity (kW)	Energy (kWh)	Class Supplied To
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		Total: _____	_____	

Annual Energy for Year 1 (kWh) _____

¹ The regulations require information for “24 months immediately preceding the date of application.” A.A.C. § R12-14-202(A)(5). We will not know these dates until the application deadline is set. Accordingly, “year 1” and “month 1” are currently being used in the draft application as placeholders. Once the application deadline is known, these placeholders will be replaced with actual dates.

Because of the lag time between the month of usage and the date the customer receives a bill for that month, it will be difficult, if not impossible, for applicants to submit data for the month immediately preceding the application deadline. Accordingly, APA should interpret the regulation to require load data for the 24-month period beginning 60 days before the application deadline. That is, if the application deadline is April 1, 2015, then “month 1” of the 24-month period should be January 2015. This will allow the applicants sufficient time to obtain their bill and organize the information for purposes of this application.

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Provide the information for the peak month of Year 2 (months 13-24) below. Load data should be from the high side of the delivery point of Hoover power. If you have more than one delivery point for Hoover power, use the highest hour or coincidence of all aggregated delivery points.

Year	Peak Month	Capacity (kW)	Energy (kWh)	Class Supplied To
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total:	_____	_____	

Annual Energy for Year 2 (kWh) _____

For Years 3,4, and 5, total monthly load and energy for the peak month each year is required. Individual monthly load data for Years 3, 4, and 5 is not required, and it is not necessary to divide the total monthly load into reference classifications. Report the total monthly load and energy for the peak month for Year 3 (months 25-36), the peak month for Year 4 (months 37-48), and the peak month for Year 5 (months 49-60). In addition, submit the annual energy for each year.

Load data should be from the high side of the delivery point of Hoover power. If you have more than one delivery point for Hoover power, use the highest hour or coincidence of all aggregated delivery points.

Year	Peak Month	Peak Capacity (kW)	Peak Energy (kWh)	Annual Energy (kWh)
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

6. Pumping Equivalent Load

Please provide the information below for pumping equivalent load. "Pumping equivalent load" means the load that you would have experienced if you had pumped groundwater in an amount equivalent to the non-permanent, non-groundwater water supply that you used for that year. Provide the pumping equivalent load for the same month that you reported as your peak month for Section 5 of this application. For example, if your peak month for Year 1 was June 2014, then in this section, provide the pumping equivalent load for June 2014 in Year 1. If you do not use non-permanent, non-groundwater supplies as a replacement for groundwater, i.e., you have firm surface water or firm groundwater supplies, then it is not necessary to fill out this section.

Below, also provide a statement of facts, assumptions, methodology, and calculations utilized to produce the reported numbers. This would include the amount of non-permanent, non-groundwater supplies used for the reported month. Failure to provide this information could delay the application process and possibly prevent the applicant from receiving an allocation.

Documentation to substantiate the data reported in this section is not required as part of the application, but should be available to supply to the Arizona Power Authority if requested to do so.

Year	Peak Month Reported in Section 5	Capacity Equivalent for Peak Month (kW)	Energy Equivalent for Peak Month (kWh)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Explanation: _____

7. Desired Points of Delivery

In accordance with section R12-14-202(A)(2)-(4) of the Arizona Administrative Code, please provide the following information concerning the Point or Points of Delivery (POD) where you will receive electric service for Hoover Power.

POD	Maximum Capacity (kW) to Deliver For a Continuous 12-Month Period	Annual Energy (kWh) to Deliver
_____	_____ kW	_____ kWh
_____	_____ kW	_____ kWh
_____	_____ kW	_____ kWh

8. Proposed Use of Long-term Power

In accordance with section R12-14-202(A)(1) of the Arizona Administrative Code, please provide a brief statement and summary of your proposed use of Long-term Power.

9. Requested Long-term Power Allocation

Provide the following information on your requested allocation. Your requested amount should match exactly the capacity and energy amounts to deliver at your requested POD.

Current Hoover Allocation (Post 1987)

_____kW _____kWh A

_____kW _____kWh B

Allocation of Schedule D Power from Western (“D-1 Power”) (Post 2017)

Requested Amount: _____kW _____kWh

Allocation _____kW _____kWh

Requested Long-term Power Allocation (Post 2017) Requested Allocation Schedule

_____kW _____kWh A

_____kW _____kWh B

_____kW _____kWh D2

Attachment: Preceding 24 Months of Data: Months 1-2

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

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Months 15-16

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

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Months 19-20

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

DRAFT

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DRAFT

Months 21-22

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

Year	Month	Class Capacity (kW)	Class Energy (kWh)	Class:
_____	_____	_____	_____	Residential
		_____	_____	Commercial
		_____	_____	Irrigation Pumping
		_____	_____	Industrial
		_____	_____	Public Use
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
		_____	_____	Other: _____
	Total	_____	_____	

Description of Classifications: _____
