SLCAIP HYDRPOWER POST 2024
APPLICANT

Valley Electric Association, Inc.

Colorado River Commission of Nevada
Application for Allocation of Salt Lake City Area Integrated Projects Power

This form was created in Microsoft Word and a digital copy is available on the Colorado River Commission of Nevada's (CRCNV) website: www.crc.nv.gov. If the form is opened in Microsoft Word, responses may be entered directly into the text boxes which will expand as needed to accept the text entered. Alternatively, additional pages for your responses may be attached by the Applicant. Applicants are requested to clearly identify on any attachments the Applicant's name and the related numbered item on the form.

ALL APPLICATIONS AND INFORMATION SUBMITTED TO THE CRCNV WILL BE CONSIDERED PUBLIC RECORDS SUBJECT TO PUBLIC DISCLOSURE UPON REQUEST. PLEASE SEE NOTE ATTACHED TO THIS APPLICATION FORM FOR MORE INFORMATION.

Completed applications must be received by the CRCNV by 5:00 p.m. PDT on:

MONDAY, JULY 16, 2018

1. Applicant Information. Please provide the following:

a. Name and address of entity/organization requesting and allocation:

Entity Name	Valley Electric Association, Inc.
Address	800 E Highway 372, PO Box 237
City, State, Zip	Pahrump, NV 89401-0237

b. Person(s) representing Applicant:

Contact Person Title	Ramon Abueg, Chief Operating Officer
Address	800 E Highway 372, PO Box 237
City, State, Zip	Pahrump, NV 89041-0237
Telephone	(775) 727-2746
Fax	(775) 727-6320
Email Address	rabueg@vea.coop

c. Was the Applicant or its predecessor in interest, a customer of the CRCNV on July 16, 1997?

Yes X	No

d. Is the Applicant the Southern Nevada Water Authority or one of its member agencies that will use the allocated resource for its water and/or wastewater operations in accordance with NRS 704.787(b)?

Yes	No X

e. Provide the amount of Salt Lake City Area Integrated Projects (SLCAIP) available capacity and energy the Applicant is requesting.

Kilowatts (summer) 20,851 kW (All)	*Kilowatts (summer)* 37,944,500 kWh (All)
Kilowatts (Winter) 27,414 kW (All)	*Kilowatts (winter)* 50,267,119 kWh (All)

2. **Applicant Data:**

Historical Demand:

a. **Provide the actual monthly maximum demand (kilowatts) experienced from October 2015 through March 2018.** ***Note:*** ***For those applying for power to be used in their water and/or wastewater operations - please provide monthly data directly related to such use.***

Federal Fiscal Year 2016						
	Oct. 2015	Nov. 2015	Dec. 2015	Jan. 2016	Feb. 2016	Mar. 2016
Demand (kilowatts)	87,557.090	114,766.550	122,843.000	120,856.000	124,326.090	91,448.850
	Apr. 2016	May 2016	Jun. 2016	Jul. 2016	Aug. 2016	Sept. 2016
Demand (kilowatts)	62,137.050	91,262.970	129,366.690	133,988.770	122,886.780	105,393.480

Federal Fiscal Year 2017						
	Oct. 2016	Nov. 2016	Dec. 2016	Jan. 2017	Feb. 2017	Mar. 2017
Demand (kilowatts)	73,128.530	105,966.460	122,244.390	118,988.320	103,242.960	102,570.830
	Apr. 2017	May 2017	Jun. 2017	Jul. 2017	Aug. 2017	Sept. 2017
Demand (kilowatts)	68,412.210	98,425.450	132,864.660	132,468.390	125,075.260	118,974.590

Federal Fiscal Year 2018						
	Oct. 2017	Nov. 2017	Dec. 2017	Jan. 2018	Feb. 2018	Mar. 2018
Demand (kilowatts)	73,914.010	89,125.170	116,579.780	110,691.960	121,465.430	110,041.210
Demand (kilowatts)						

b. **Applicant's Power Resources. Please provide the energy resources in kWh that were delivered (scheduled) to serve Applicant's load from October 2015 through March 2018 during standard On-Peak and Off-peak Periods, as defined by the North American Electric Reliability Corporation ("NERC"). Delivered resources should total up to the loads in each period.**

NERC On-Peak Period

Federal Fiscal Year 2016						
	Oct. 2015 kWh	Nov. 2015 kWh	Dec. 2015 kWh	Jan. 2016 kWh	Feb. 2016 kWh	Mar. 2016 kWh
Hoover (kWh)	1593000	1485000	1587000	1367000	1681000	2210000
Parker-Davis (kWh)	1786000	1544000	1711000	1547000	1508000	2906000
SLCAIP (kWh)	1518000	1381000	1658000	1601000	1565000	1814000
Purchased Power (kWh)	13,971,843	15,469,809	21,976,837	19,819,622	17,061,856	14,070,754
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)						
On-Peak Load (kWh) Total of resources above	18,868,843	19,859,809	26,932,837	24,334,622	21,815,856	20,800,754
	Apr. 2016 kWh	May 2016 kWh	June 2016 kWh	July 2016 kWh	Aug 2016 kWh	Sep. 2016 kWh
Hoover (kWh)	2542000	1650000	2135000	1696000	1700000	1537000
Parker-Davis (kWh)	2992000	2824000	3241000	3007000	3467000	2771000
SLCAIP (kWh)	1006000	921000	1068000	2006000	1250000	952000
Purchased Power (kWh)	11,400,581	13,698,051	23,813,508	22,743,424	25,821,894	17,299,032
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)						
On-Peak Load (kWh) Total of resources above	17,940,581	19,293,051	30,247,508	29,454,424	32,238,894	22,589,032

Federal Fiscal Year 2017						
	Oct. 2016 kWh	Nov. 2016 kWh	Dec 2016 kWh	Jan. 2017 kWh	Feb. 2017 kWh	Mar. 2017 kWh
Hoover (kWh)	2953000	3387000	2619000	2448000	2704000	3878000
Parker-Davis (kWh)	1621000	1483000	1597000	1559000	1460000	2508000
SLCAIP (kWh)	2083000	2036000	2399000	1996000	2280000	2329000
Purchased Power (kWh)	11,590,148	12,619,099	18,390,317	19,029,136	12,171,673	9,872,940
Fossil Fueled Generation (kWh)				793000	1414000	2384000
Renewable Resources (kWh)						
On-Peak Load (kWh) Total of resources above	17,957,148	19,525,099	25,005,317	25,825,136	20,029,673	21,031,940
	Apr. 2017 kWh	May 2017 kWh	June 2017 kWh	July 2017 kWh	Aug 2017 kWh	Sep. 2017 kWh
Hoover (kWh)	3235000	3744000	4390000	3568000	3572000	2950000
Parker-Davis (kWh)	2195000	2653000	2969000	2750000	2926000	2375000
SLCAIP (kWh)	1356000	1770000	1444000	1478000	1795000	1341000
Purchased Power (kWh)	8,274,006	11,322,652	18,424,017	21,455,406	22,376,981	13,748,421
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)	2103000	2452000	2351000	1955000	2114000	1972000
On-Peak Load (kWh) Total of resources above	17,163,006	21,941,652	29,578,017	31,194,406	32,783,981	22,386,421

Federal Fiscal Year 2018						
	Oct. 2017 kWh	Nov. 2017 kWh	Dec. 2017 kWh	Jan. 2018 kWh	Feb. 2018 kWh	Mar 2018 kWh
Hoover (kWh)	1393000	1490000	1104000	1114000	1625000	1445000
Parker-Davis (kWh)	1496000	1556000	1415000	1594000	1391000	2230000
SLCAIP (kWh)	2105000	1771000	2043000	2323000	2076000	2210000
Purchased Power (kWh)	11,887,688	12,318,766	17,775,484	17,556,141	15,647,498	11,947,081
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)	2209000	1632000	1125000	1445000	1789000	2037000
On-Peak Load (kWh) Total of resources above	19,090,688	18,767,766	23,462,484	24,032,141	22,528,498	19,869,081

NERC Off-Peak Period

Federal Fiscal Year 2016						
	Oct. 2015 kWh	Nov. 2015 kWh	Dec. 2015 kWh	Jan. 2016 kWh	Feb. 2016 kWh	Mar. 2016 kWh
Hoover (kWh)	656000	928000	670000	1117000	1236000	1601000
Parker-Davis (kWh)	1160000	1307000	1235000	1399000	1157000	2559000
SLCAIP (kWh)	823000	750000	876000	1108000	812000	1146000
Purchased Power (kWh)	14,303,330	21,408,497	27,738,646	28,147,401	18,875,872	13,245,069
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)						
On-Peak Load (kWh) Total of resources above	16,942,330	24,393,497	30,519,646	31,771,401	22,079,872	18,551,069
	Apr. 2016 kWh	May 2016 kWh	June 2016 kWh	July 2016 kWh	Aug 2016 kWh	Sep. 2016 kWh
Hoover (kWh)	1548000	1209000	1038000	1174000	592000	950000
Parker-Davis (kWh)	2298000	2705000	2049000	2460000	2000000	2299000
SLCAIP (kWh)	761000	689000	788000	2578000	934500	811000
Purchased Power (kWh)	12,433,997	14,419,718	19,141,521	23,691,476	21,072,137	16,255,287
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)						
On-Peak Load (kWh) Total of resources above	17,040,997	19,112,718	23,016,521	29,901,476	24,598,137	20,315,287

Federal Fiscal Year 2017						
	Oct. 2016 kWh	Nov. 2016 kWh	Dec 2016 kWh	Jan. 2017 kWh	Feb. 2017 kWh	Mar. 2017 kWh
Hoover (kWh)	1383000	2473000	1295000	1394000	1370000	3732000
Parker-Davis (kWh)	1324000	1372000	1345000	1387000	1201000	2956000
SLCAIP (kWh)	1285000	1034000	1249000	1874000	1142000	1644000
Purchased Power (kWh)	14,596,781	15,809,567	26,762,587	25,221,680	17,028,787	10,023,438
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)				269000	561000	827000
On-Peak Load (kWh) Total of resources above	18,568,781	20,688,567	30,651,587	30,145,742	21,302,638	19,182,261
	Apr. 2017 kWh	May 2017 kWh	June 2017 kWh	July 2017 kWh	Aug 2017 kWh	Sep. 2017 kWh
Hoover (kWh)	4560000	3705000	2436000	2991000	1646000	1777000
Parker-Davis (kWh)	3094000	2875000	2320000	2716000	2540000	2697000
SLCAIP (kWh)	1187000	1559000	1212000	1484000	1347000	1238000
Purchased Power (kWh)	8,431,176	9,932,059	16,251,759	24,208,762	19,112,781	16,073,700
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)	1150000	993000	852000	1084000	815000	1020000
On-Peak Load (kWh) Total of resources above	18,422,676	19,064,101	23,071,304	32,463,521	25,460,458	22,806,018

Federal Fiscal Year 2018						
	Oct. 2017 kWh	Nov. 2017 kWh	Dec. 2017 kWh	Jan. 2018 kWh	Feb. 2018 kWh	Mar 2018 kWh
Hoover (kWh)	628000	1045000	1001000	518000	1020000	1551000
Parker-Davis (kWh)	1449000	1294000	1529000	1348000	1270000	3241000
SLCAIP (kWh)	1261000	1300000	1604000	1574000	1344000	1762000
Purchased Power (kWh)	13,448,580	15,025,734	25,625,479	22,080,010	19,069,575	14,956,876
Fossil Fueled Generation (kWh)						
Renewable Resources (kWh)	940000	711000	695000	668000	764000	789000
On-Peak Load (kWh) Total of resources above	17,726,358	19,375,830	30,453,990	26,188,302	23,467,308	22,299,458

c. **Future Demand:**

Identify any factors or conditions between the date of this Application and October 1, 2024 which may increase or decrease peak demands and energy use by 10% or more:

New Agricultural Grow Farms New Mining Operation

d. **Transmission:**

Points of delivery/location of energy delivery: Provide the Applicant's requested point(s) of delivery on the Parker-Davis Transmission System, the voltage of service required and the capacity desired. The CRCNV's authorized point(s) of delivery include Amargosa Substation, Basic Substation, Boulder City Tap, Clark Tie, and Mead Substation.

Mead 230-kV Substation and/or Amargosa 138-kV Substation

e. **Ability to Use:**

Provide a brief explanation of the Applicant's ability to receive and use the requested resource as of October 1, 2024.

VEA owns, operates and has access to transmission under various agreements. We will have a need for them for years to come. Our load has increased by over 20% since 2010 and is projected to grow by an average of 1.1 percent p

3. **Provide a statement from the Applicant identifying the benefit to the state from their receipt of the allocated resource.** Applicants should demonstrate how receipt of the allocated resource would provide the "greatest possible benefit to this state." If applicable, Applicant should also demonstrate how loss of an existing allocation could impact the Applicant to the detriment of the state.

The allocation of the requested resources to Valley Electric Association, Inc. (VEA) will achieve the greatest possible benefit to the state for the following reasons:

- The economical, reliable renewable power resources, if granted to Valley Electric Association, would take the place of less affordable and environmentally friendly resources and goes further in serving consumers in need than anywhere else in Nevada. In fact, it would be difficult to imagine a better source for the allocation of resources than VEA.
- More than 90 percent of the consumers of VEA power reside in Nye County, which is among the more economically depressed counties in the state.
- According to recent census data, the median income for a household in Nye County is $41,000 and the median family income is $50,000. By comparison, the median household income statewide is $55,750, and the median family income is approximately $64,500.
- Only two of Nevada's 17 counties rank below Nye, and one of them (Esmeralda) also is in the VEA service territory.
- Nye County fares a little better nationally, but not much. In the United States, the median household income is about $52,000, and family income is $63,000.
- As a result energy expenses take up a far greater percentage of household income of residents of Nye County than households elsewhere in the state.
- Affordable hydropower has contributed to more than a 20% increase in VEA's load since 2010 and it will help drive a projected annual average load growth of 1.1 percent through 2034.
- The allocated hydropower resources will help VEA to continue to directly contribute to the economy of Nye County, which it has been doing by increasing employment by more than 100% since the depths of the last recession.
- The additional hydropower will help VEA continue to invest in the technological infrastructure needed for the 21st century such as bringing high speed fiber optic internet communication services to rural Nevada homes, schools and businesses.
- It will also help VEA continue to make investments in Nevada's future such as electricity storage, electric vehicle charging stations and community solar generation.
- It will help VEA continue its Lighthouse Assistance Program, providing up to $200 for low income senior members in having difficulty paying their electric bill.
- This resource also helps make the renewable energy we take from the Community Solar Project (15 MW photovoltaic generator located in Pahrump, NV) viable by shaping and firming it.
- Finally, it will also help VEA continue a decade-long tradition of awarding hard-working students with currently in excess of $10,000 in academic, vocational/technical, and continuing education scholarships to assist members and their families as well as help continue VEA's successful energy saving solar water heater & irrigation efficiency pump testing programs.

VEA is always searching for additional renewable power resources at affordable rates, not because it serves the interests of investors but because it directly benefits our members, who are also our owners. If allocated to VEA, these resources will provide the greatest possible benefit to Nevada by keeping more money, jobs and investments for the future in the state economy.

The loss of our existing reliable, affordable and renewable SLCAP hydropower allocation would impact VEA's ability to provide the aforementioned benefits (see above), to the detriment of the state if these resources are not allocated to VEA. It will diminish our ability to maintain rate stability and keep more money, jobs and investments for the future in the state economy. More explicitly:

- It will diminish our ability to provide reliable, affordable and environmentally friendly electricity to consumers in need in one of the most economically depressed areas of Nevada.
- It will diminish our ability to make further investments in the technological infrastructure needed for the 21st century such as bringing high speed fiber optic internet communication services to rural Nevada homes, schools and businesses.
- It will diminish our ability to make further investments in Nevada's future such as electricity storage, electric vehicle charging stations and community solar generation.
- It will diminish our ability to maintain or increase our current employment levels.
- It will diminish our ability to provide assistance to low income members experiencing difficulty paying their electric bill as well as diminish our ability to provide energy efficiency programs.

e. Ability to Use: Provide a brief explanation of the Applicant's ability to receive and use the requested resource as of October 1, 2024.

VEA owns, operates and has access to transmission under various agreements. We will have a need for them for years to come. Our load has increased by over 20% since 2010 and is projected to grow by an average of 1.1 percent.

3. Provide a statement from the Applicant identifying the benefit to the state from their receipt of the allocated resource. Applicants should demonstrate how receipt of the allocated resource would provide the "greatest possible benefit to this state." If applicable, Applicant should also demonstrate how loss of an existing allocation could impact the Applicant to the detriment of the state.

The allocation of the requesled resources to Vahey Elecllic Association, Inc. (VEA) will achieve the greatest possible benefil lo the state for the following reasons:

- This economical, reliable renewable power resource, if granted lo Valley Electric Association, would take the place of less affordable and environmentally friendly resources and goes further in serving consumers in need than anywhere else in Nevada. In fact, it would be difficult to imagine a better source for the allocation of resources than VEA

- More than 90 percent of the consumers of VEA power reside In Nye County, which is among the more economically depressed counties in the state.

- According to recent census data, the median income for a household in Nye County is $41,000 and the median family Income is $50,000. By comparison, the median household income statewide is $55,750, and the median family income Is approximately $64,500.

- Only two of Nevada's 17 counties rank below Nye, and one of them {Esmeralda) also is in the VEA service territory.

- Nye County fares a little better, nationally, but not much. In the United States, the median household Income is about $52,000, and family income is $63,000.

- As a result, energy expenses take up a far great• percentage of household income of residents of Nye County than households elsewhere in the state.

- Affordable hydropower has contributed to more than a 20% increase in VEA's load since 2010 and it will help drive a projected annual average load growth of 1.1 percent through 2034.

- The allocated hydropower resources will help VEA lo continue lo directly contribute to the economy of Nye County, which it has been doing by increasing employment by more than 100% since the depths of the last recession.

- The additional hydropower will help VEA continue to invest in the technological infrastructure needed for the 21st century such as bringing high speed fiber optic internet communication services lo rural Nevada homes, schools and businesses.

- It will also help VEA continue to make investments in Nevada's future such as electricity storage, electric vehicle charging stations and community solar generation.

- It will help VEA continue its Lighthouse Assistance Program, providing up to $200 for low income senior members in having difficulty paying their electric bill.

- This resource also helps make the renewable energy we take from the Community Solar Project (15 MW photovoltaic generator located in Pahrump, NV) viable by shaping and firming it.

- Finally, it will also help VEA continue a decade long tradition of awarding hard working students with currently in excess of $10,000 in academic, vocational, technical, and continuing education scholarships to assist members and their families as well as help continue VEA's successful energy saving solar water heater" & irrigation efficiency pump, testing programs.

VEA is always searching for additional renewable power resources at affordable rates, not because it serves the interests of investors but because it directly benefits our members, who are also our owners. If allocated to VEA, these resources will provide the greatest possible benefit to Nevada by keeping more money, jobs and Investments for the future in the stale economy.

The loss of our existing reliable, affordable and renewable SLCAIP hydropower allocation would impact VEA's ability to provide the aforementioned benefits (see above), to the detriment of the state. If these resources are not allocated lo VEA, it will diminish our ability to maintain rate stability and keep more money, jobs and investments for the future in the state economy. More explicitly:

- It will diminish our ability to provide reliable, affordable and environmentally friendly electricity to consumers in need in one of the most economically depressed areas of Nevada.

- It will diminish our ability to make further investments in the technological infrastructure needed for the 21st century such as bringing high speed fiber optic internet communication services to rural Nevada homes, schools and businesses.

- Il will diminish our ability to make further investments in Nevada's future such as electricity storage, electric vehicle charging stations and community solar generation.

- It will diminish our ability to maintain or increase our current employment levels.

- It will diminish our ability to provide assistance to low income members experiencing difficulty paying their electric bill as well as diminish our ability to provide energy efficiency programs.

Provided by Staff for readability.

4. **Creditworthiness:**

a. **If the Applicant is publicly traded, provide exchange and symbol:**

NA

b. **Provide the Applicant's Dun and Bradstreet D-U-N-S Number if available:**

41679515

c. **Provide the Applicant's most recent bond and credit rating if available:**

NA

d. **Attach a chart showing all equity interests, including corporate structure of the parent and subsidiary organization, if applicable.**

e. **If Applicant has a parent company, provide the requested information in items 4a) though 4c) for the parent company, and attach a signed statement by the parent company that the parent company is willing to provide a parental guarantee if required.**

f. **If applicable, does the Applicant have independent rate setting authority to raise its customer's rates to cover expenses? Please explain.**

Yes. Our Board of Directors has the authority to raise rates.

g. **If applicable, does the Applicant have the taxing authority to cover expenses? Please explain.**

NA

h. **If applicable, please state the number of late payments to the CRCNV in the past three years, the date of the invoice that was not timely paid and the actual date of payment. Please explain the circumstances for each late payment.**

Our CRCNV pmt in the amount of $39,160.44, due August 9, 2017 was paid August 10, 2017. The late payment was due to a wire payment scheduling error

i. **Provide complete copies of the Applicant's Audited Financial Statements for the past three years.**

Please see enclosed files for VEA's 2015 - 2017 audited consolidated financial statements

5. **Other Information:**

The Applicant may provide any other information pertinent to the application.

Again, VEA is always searching for additional renewable power resources at affordable rates, not because it serves the interests of investors but because it directly benefits our members, who are also our owners. If allocated to VEA, these resources will help us maintain our rates, enhancing our ability to provide the greatest possible benefit to Nevada by keeping more money, jobs and investments for the future in the state economy.

This resource also helps us firm and shape the renewable energy we take from the 15MW Community Solar Project photovoltaic generator located in Pahrump, NV and also enhances our ability to offer assistance to our low income members.

VEA is a longtime CRC customer of this resource. Our loads have been growing and that's expected to continue. We expect to have a need for the requested resources well into the future (whether or not energy choice is implemented). Indeed, VEA was able to utilize 100% of AMPAC's "layoff" hydropower and transmission allocations made available on a temporary 12-month term from October 1, 2016 – September 30, 2017.

6. **By signing this application, the Applicant acknowledges that if the Applicant accepts an allocated resource from the CRCNV, the Applicant will be subject to the following:**

   i. The Applicant will execute a Contract with the CRCNV in the Fall of 2018 for power deliveries beginning on October 1, 2024.

   ii. The Applicant must enter into a new contract, prior to June 1, 2024, with the CRCNV to take and pay for transmission service from Pinnacle Peak on the SLCAIP Transmission system, to one or more of the southern Nevada delivery points on the Parker-Davis Transmission system which currently include Amargosa Substation, Basic Substation, Boulder City Tap, Clark Tie, and Mead Substation.

   iii. An Applicant utilizing continuous or backup transmission service over the Parker-Davis Project Southern Nevada Facilities, or an Applicant directly interconnected to the Parker-Davis Project Southern Nevada Facilities, must have an existing contract with the CRCNV or enter into a new contract with the CRCNV to take and pay for service over those facilities prior to June 1, 2024 for power deliveries beginning on October 1, 2024.

7. **Signature:**

The Colorado River Commission of Nevada requires the signature and title of an appropriate official who can attest to the validity of the application and who is authorized to submit the request for an allocation.

By signing below, I certify the information which I have provided is true and correct to the best of my information, knowledge and belief.

Signature _____ Title Chief Operating Officer

Print Name Ramon Abueg

Applications may be addressed to the Executive Director and submitted:

- **By email addressed to: crcpower@crc.nv.gov;**
- **By fax to (702) 486-2695; or**
- **By personal delivery or U.S. Mail to the CRCNV's office, 555 E. Washington Avenue, Suite 3100, Las Vegas, NV 89101.**

Applications may be submitted between **June 25, 2018** and **July 16, 2018**.

No applications will be accepted after 5:00 p.m. PDT on:

MONDAY, JULY 16, 2018

Valley Electric Association, Inc.
A Touchstone Energy® Cooperative

August 30, 2018

Ms. Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 E. Washington Avenue, Suite 3100
Las Vegas, NV 89101

VIA EMAIL: crcpower@crc.nv.gov

Subject: Allocation of SLCAIP Hydropower Post 2024

Dear Ms. Harkins:

Thank you for the opportunity to submit comments on the Colorado River Commission of Nevada's ("CRC") draft Commission Order proposing allocations of hydropower from the Salt Lake City Area Integrated Projects (SLCAIP) for the period of October 1, 2024 through September 30, 2057.

In accordance with the criteria applied and analyses performed by Staff, Valley Electric Association (VEA) agrees the requirements for allocation have been appropriately applied. In addition, VEA supports the Draft Order's findings of facts and recommendations. VEA further agrees that the proposed allocation provides the greatest possible benefit for the state.

VEA appreciates the opportunity to comment on this matter.

Respectfully Submitted,

Angela Evans

Angela Evans,
Chief Executive Officer

cc: File

800 E Highway 372 • PO Box 237 • Pahrump, NV 89041-0237
Phone: (775) 727-5312 or (800) 742-3330 (In Nevada) • Fax: (775) 727-6320 • www.vea.coop

COMMENTS

Marco Velotta
Sr Management Analyst
City of Las Vegas Long Range Planning
Office of Sustainability
333 Rancho Dr.
Las Vegas, NV 89106

December 6, 2018

RE: Intent to Withdraw SLCAIP Application

Dear Ms. Bates:

Thanks to you and your team for the assistance navigating the Salt Lake City Area Integrated Projects (SLCAIP) hydropower application process, which the City applied for in July, 2018. Although the Draft Order for an allocation of the SLCAIP hydropower to the City was not approved by the Commission, the City has decided to to withdraw our application from consideration without prejudice. After considering some of the economics and wastewater treatment load factors over the past few weeks, we believe that the circumstances have changed enough for the City to discontinue the process. We look forward to continue working with you and the Commission on our existing hydropower contracts.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Marco N. Velotta, AICP
Senior Management Analyst
mvelotta@LasVegasNevada.GOV
702-229-4173

CC: Tom Perrigo - Executive Director of Community Development, City of Las Vegas
Charles Trushel - Sr Management Analyst, City of Las Vegas
Eric Witkoski - Interim Executive Director, CRC

From: MELISA GARCIA
To: CRC Power
Cc: Mendis Cooper; Terry Romero
Subject: SLCAIP Allocation Comments
Date: Tuesday, January 29, 2019 9:29:08 AM

Please find the below comments for the Draft Order for Allocation of power for SLCAIP Hydropower 2024:

The valuable resource provided in this SLCAIP allotment will help Overton Power District No. 5 to continue providing quality and affordable power to all customers in our service territory. We would like to thank the Commissioners and Staff of the Colorado River Commission for their work and thorough review in the allocation process for the SLCAIP allotment and consideration of our comments.

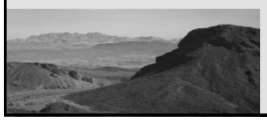
--
MeLisa Garcia
Accounting Supervisor
Overton Power District No. 5
(702) 397-3034

PRESENTATION

Colorado River Commission of Nevada (CRCNV)

Salt Lake City Area Integrated Project (SLCAIP)
Post-2024 Allocation Hearing






February 12, 2019

SLCAIP Information

- Initial hydroelectric generation began in 1963.
- SLCAIP is comprised of two Utah Dams, three Colorado dams and one Wyoming dam, and 5 additional power plants.
- Total of 11 powerplants with a combined installed capacity of 1,816 MW.
  - Installed Capacity at Hoover is 2,074 MW
- CRC's federal allocation is approximately 1.5% of the total capacity.

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SLCAIP Allocations

- CRCNV's federal contract and state customer contracts expire September 30, 2024.

CRCNV Current Allocations of SLCAIP Hydropower

Contractor	Winter Capacity (kW)	Summer Capacity (kW)	Annual Energy (kWh)
City of Boulder City	7,279	5,537	23,422,458
Overton Power District No. 5	8,256	6,279	26,565,338
Valley Electric Assoc.	11,879	9,035	38,223,823
CRCNV Total	27,414 kW	20,851 kW	88,211,619 kWh

Updated 12/08/2017

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Federal Contract Process

- Federal contract issued to CRCNV on March 9, 2018.
- About half of the Federal Contractors have already signed their post-2024 contract.
  - The CRC has not signed pending the completion of the current SLCAIP customer allocation process.

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CRC Allocation Process

- April, 2018: Staff issued a Notice of Public Meeting and Request for Comments on the draft Notice and Invitation to Apply, draft allocation criteria, and draft application.
- May 15, 2018: Public Meeting
- June 12, 2018: Commission approved the draft Notice and Invitation to Apply, allocation criteria, and application.

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CRC Allocation Process

- June 14, 218: Staff issued the Notice, allocation criteria, and application
- July 16, 2018: Staff received four applications.
- Staff received three applications from existing SLCAIP Contractors:
  - City of Boulder City
  - Overton Power District No. 5
  - Valley Electric Association
- Staff also received an application from the City of Las Vegas

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Staff Recommendations

- At a hearing held on September 11, 2018, staff recommended that the current contractor allocations be reduced by approximately 7% to create a resource pool for the City of Las Vegas.
- The Commission did not reach a decision on the allocation and requested additional information addressing the impact on current contractors if their allocations were reduced.

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Further Actions

- Staff reached out to all four applicants and issued data requests to confirm the cost impact on existing contractors of receiving a reduced allocation and the benefit to the City of Las Vegas of receiving a new allocation.
- Staff received a letter on December 6, 2018 from the City of Las Vegas withdrawing their request for an allocation "after considering some of the economics and wastewater treatment load factors."

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Revised Staff Recommendation

- Staff recommends maintaining the existing allocations of the three remaining SLCAIP contractors.

Applicants	Summer		Winter	
	kW	kWh	kW	kWh
City of Boulder City	5,537	10,075,242	7,279	13,347,215
Overton Power District No. 5	6,279	11,427,163	8,256	15,138,176
Valley Electric Association	9,035	16,442,095	11,879	21,781,728
Total:	20,851	37,944,500	27,414	50,267,119

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Draft Order

- Staff submitted the Draft Order to the Applicants for review on January 22, 2019 and received one comment from Overton Power District No. 5.

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Questions?

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