

December 20, 2022

Reclamation 2007 Interim Guidelines  
SEIS Project Manager  
Upper Colorado Basin Region  
125 South State Street, Suite 8100  
Salt Lake City, UT 84138  
[CRinterimops@usbr.gov](mailto:CRinterimops@usbr.gov)

Re: U.S. Bureau of Reclamation's Notice of Intent to Prepare a Supplemental Environmental Impact Statement for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead ("NOI"), as published in Fed. Reg. Vol. 87, No. 221211 (November 17, 2022) ("NOI").

Dear Bureau of Reclamation:

Summary:

Thank you for the opportunity to provide comments on the U.S. Bureau of Reclamation's Notice of Intent to Prepare a Supplemental Environmental Impact Statement for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (NOI), as published in Fed. Reg. Vol. 87, No. 221211 (November 17, 2022) (NOI).

About UAMPS:

UAMPS is a political subdivision of the State of Utah headquartered in Salt Lake City, whose membership consists of 50 municipal and other community-owned electric utilities located in seven western states 37 of which are located in Utah. UAMPS is a joint action agency (JAA); a JAA is an entity formed to provide services, including the sale of wholesale power, to member public power utilities (and, in some instances, electric cooperative utilities). Most UAMPS members own and operate a local electric utility system that provides integrated retail electric service to residential, commercial, and industrial customers. UAMPS partners with its members to ensure that electricity is affordable and reliable.

UAMPS currently manages 17 separate projects that provide power supply, transmission, and other services to participating members. In addition to owning interests in or directly operating power plants and other sources of electrical power, UAMPS and its members regularly purchase power off the

grid, and are, therefore, sensitive to market and regulatory forces that impact electricity affordability and reliability.

UAMPS' interest in NOI:

Western Area Power Administration (WAPA) is one of the country's four power marketing administrations ("PMAs") in the United States that sells wholesale power to public customers, such as municipally owned utilities, irrigation districts, and electric cooperatives which then resell the power to end-use consumers in the retail market. While Congress found there to be multiple purposes of providing preference power, one is to directly benefit the public through nonprofit entities like UAMPS members. The hydroelectric plants were constructed, and continue to be owned and operated, by the U.S. Army Corps of Engineers and Interior's Bureau of Reclamation (BOR).

In today's energy market, with rapidly declining capacity generation, rising inflation, and interest costs, developing replacement capacity resources like the energy generated on the Colorado River is incredibly difficult. Further, as nonprofit entities, retail customers of UAMPS members absorb the higher costs of energy.

UAMPS supports CREDA's comment:

As entities representing preference customers throughout the State of Utah, UAMPS supports the comments submitted by the Colorado River Energy Distributors Association (CREDA). In particular, UAMPS joins CREDA in requesting that "the scope of the supplemental environmental impact statement (SEIS) analyze the cumulative effects on hydropower production including Basin Fund impacts, impacts to WAPA's contractual obligations to deliver federal hydropower, financial and societal impacts to firm electric service customers and impacts to transmission grid operations."<sup>1</sup>

Sincerely,



Mike Squires  
Government Affairs Director  
UAMPS

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<sup>1</sup> James, Leslie, Executive Director CREDA, comment letter re: Supplemental Environmental Impact Statement for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead LOI (December 2022).