



CREDA

Colorado River Energy Distributors Association

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

Holy Cross Energy

Intermountain Rural Electric Association

Platte River Power Authority

Tri-State Generation & Transmission Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric Association, Inc.

NEBRASKA

Municipal Energy Agency of Nebraska
(also Colorado, Wyoming)

NEVADA

Colorado River Commission of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

UTAH

City of Provo

City of St. George

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

Leslie James

Executive Director

CREDA
10429 S. 51st St., Suite 230
Phoenix, Arizona 85044

Phone: 480-477-8646

Fax: 480-477-8647

Cellular: 602-469-4046

Email: creda@creda.cc

Website: www.credanet.org

April 30, 2020

Ms. Carly Jerla – LC Region
Mr. Malcolm Wilson – UC Region
Bureau of Reclamation
7DReview@usbr.gov

Dear Ms. Jerla and Mr. Wilson:

The Colorado River Energy Distributors Association (CREDA) appreciates the opportunity to provide comment on Reclamation's scoping process associated with 2007 Interim Guidelines. CREDA members serve over 4.1 million consumers in the Colorado River basin states of Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming, and represent the majority of the firm electric service customers of the Colorado River Storage Project (CRSP). As such, CREDA and its members have a unique interest in role in issues associated with Colorado River operations, specifically Interim Guidelines, shortage sharing, and drought contingency planning and operations.

CREDA members participated in Reclamation's webinars held March 24 and 31, 2020, and understand that the current 7.D. process is focused on developing a report containing a retrospective review of past operations and actions under the 2007 Interim Guidelines.

The webinar presentation materials state that one of the goals of this report is to review "the effectiveness of the three stated purposes of the 2007 Interim Guidelines." One of the stated e purposes is to "improve Reclamation's management of the Colorado River by considering trade-offs between the frequency and magnitude of reductions of water deliveries, and considering the effects on water storage in Lake Powell and Lake Mead, and on water supply, *power production*, recreation, and other environmental resources" (emphasis added).

In 2005, CREDA wrote to then-Interior Secretary Gale Norton expressing a multitude of concerns regarding CRSP generation, drought and Basin Fund issues. On April 25, 2007, CREDA submitted comments on the Interim Guidelines draft EIS, requesting that "Hydropower generation impacts, although addressed in detail in the DEIS, should be added as one of the 'three important considerations' in this DEIS".

As federal hydropower production is an integral part of the stated purposes of the 2007 Interim Guidelines, CREDA recommends that hydropower be added as one of the Operational Topics described in the 7.D. review. As CREDA members' CRSP firm electric service contracts are with WAPA, and as WAPA provided hydropower impacts assessments for the 2007 Interim Guidelines, the Aspinall, Flaming Gorge and Glen Canyon Dam EIS processes, CREDA suggests Reclamation engage WAPA to provide the relevant hydropower data for the 7.D. review.

CREDA looks forward to engaging with Reclamation as this and future Colorado River processes are undertaken. Please don't hesitate to call me with any questions.

Sincerely,

Leslie James

Leslie James
Executive Director

Cc: Steve Johnson – WAPA
CREDA Board