



Public Power Council

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November 1, 2012

Via Email: JOT@WAPA.Gov

RE: Request for Extending the Comment Period on the JOT's Draft Recommendations to the Secretary of Energy on the Future of the PMAs.

I am writing to you on behalf of the Public Power Council (PPC), a regional trade association representing preference customers of the Bonneville Power Administration (BPA), to request that the Department provide at least 90 days for public comment on the draft recommendations to the Secretary affecting the Western Area Power Administration (WAPA). While PPC members are not WAPA customers, we have a vested interest in the recommendations, and the procedural precedents, that are established in this initial outgrowth of the Secretary's March 16 memorandum on the future of the federal Power Marketing Administrations (PMAs).

PPC and its members - as well as preference customer representatives throughout the country, have been active participants in the discussions and process prompted by the release of the March 16th Memorandum. We have consistently shared our concerns about the necessity, statutory authority, scope, and processes associated with the Secretary's PMA initiative.

Department representatives have indicated that they expect to release draft recommendations by early November, to be followed by a thirty-day comment period. This will be the first chance to review concrete proposals and evaluate their potential consequences. This opportunity for review and comment should not be rushed. While the JOT will have had months to develop its recommendations, customers should not be given only thirty days to consider their implications.

We have been told by the JOT and the Secretary's representatives that the Department of Energy wants to implement its plans by the end of the calendar year. Compressing the timeframe for comment in order to meet this artificial deadline will not provide all stakeholders with a meaningful opportunity to review the JOT's recommendations, analyze their implications, and offer well-considered comments. PPC respectfully requests that the JOT provide a ninety-day comment period on its draft recommendations rather than the thirty days currently expected.

Sincerely,

A handwritten signature in black ink that reads "Scott Corwin".

Scott Corwin
Executive Director

Cc: Anita Decker