



December 2, 2024

Rebecca Bernat, Manager  
Arizona Water Banking Authority  
1110 West Washington Street, Suite 310  
Phoenix, Arizona 85007

**Re: Comments on Draft 2025 Plan of Operation**

Dear Ms. Bernat,

The Arizona Municipal Water Users Association (AMWUA) believes the Arizona Water Banking Authority (AWBA) has and will continue to play a pivotal role in supporting the water security of Arizonans. All ten of AMWUA's members, who together serve over half our state's population, have Central Arizona Project (CAP) Municipal & Industrial (M&I) subcontracts. The AWBA's statutory responsibility to firm reductions to these subcontracts matters to us because it provides assurance in the face of an uncertain future.

Accordingly, we believe the 2025 Plan of Operation should indicate how the AWBA intends to better prepare for distributing its long-term storage credits for at least ten-years to firm CAP M&I deliveries post-2026. Whatever the final implemented post-2026 Colorado operational guidelines may be, we anticipate there will be reductions to CAP M&I deliveries. Therefore, the AWBA should resume discussions on how it would distribute credits for firming so that municipal water providers will be better informed to plan accordingly on how to offset reductions to their CAP supplies.

Respectfully,

Warren Tenney  
Executive Director

**Arizona Municipal Water Users Association**