



August 16, 2007

Mr. Robert J. Harris, Regional Manager
Upper Great Plains Region
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101-1266

RECEIVED IN BILLINGS UGPCSR
AUG 20 2007

Dear Mr. Harris,

Minnkota Power Cooperative, Inc. (MPC) appreciates the opportunity to submit these comments in regard to the proposed third Resource Pool for the Pick-Sloan Missouri Basin Program (P-SMBP) of the Western Area Power Administration (Western), effective January 1, 2011, as proposed in the Federal Register Notice dated June 25, 2007.

MPC is a regional generation and transmission cooperative serving eleven (11) member-owner distribution cooperatives. MPC is also the operating agent for Northern Municipal Power Agency (NMPA), which services twelve (12) municipal utilities. MPC's service area is located in eastern North Dakota and northwestern Minnesota.

MPC is a long-term firm power customer of P-SMBP's transmission system. Altogether, our joint system consumes (utilizes) 120 megawatts from the P-SMBP system.

MPC requests that Western not deviate from the policies and procedures that were established in the formation and implementation of the two previous Resource Pools. In the establishment of the two prior Resource Pools, Western, working under the directive of allocating the power from the project-specific resource pools to eligible new customers and/or for other appropriate purposes, has used similar policies and procedures. MPC believes that this precedent set by Western has yielded practical results; and, therefore, no change to the existing policies and procedures is warranted.

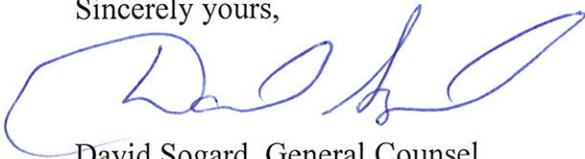
MPC requests that Western's allocations from the third Resource Pool be distributed in significant amounts to new firm power customers. Western should allocate sufficient amounts that would result in tangible benefits to new customers. Providing small allocations will not provide a significant benefit to offset the hardship worked on existing firm power customers whose allocations have been reduced by Resource Pool withdrawals.

To avoid potential hardship on existing firm power customers, MPC requests that Western interpret "appropriate purposes" within the bounds of existing laws and regulations. Specifically, a change in the working application and/or definition of "appropriate purposes" in regard to the eligibility requirements of the third Resource Pool for receiving firm power allocations of federal power would be a disservice to the firm power customers and the members of the first and second Resource Pools.

Additionally, MPC requests that the terms and conditions of contracts for the members of the third Resource Pool be identical to the terms and conditions of existing firm power customers. Keeping a level operating ground amongst the long-term firm power purchasers and the members of the three Resource Pools, ensures that Western maintains its reputation as a fair and equitable provider of power supply and transmission services.

MPC appreciates the opportunity to provide comments. We look forward to working with Western on the issues in the comments. If you have any questions regarding these comments, please contact me at (701) 795-4210.

Sincerely yours,



David Sogard, General Counsel
Minnkota Power Cooperative, Inc.