



**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**

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Upper Great Plains Region  
Western Area Power Administration  
2900 4<sup>th</sup> Avenue North  
Billings, MT 59101-1266

Via e-mail to: AOS@wapa.gov

Tri-State Generation and Transmission Association (Tri-State) is submitting these comments on the Western Area Power Administration's (Western) *Notice of Western Area Power Administration Recommendation to Pursue Regional Transmission Organization Membership* (78FR65641).

Tri-State is a cooperative generation and transmission corporation headquartered in Westminster, Colorado. Tri-State's primary functions involve the generation, transmission, transformation and sale of electricity at wholesale to its forty-four member distribution cooperatives within the states of Colorado, Nebraska, New Mexico and Wyoming. The member systems serve approximately 1.4 million consumers in both the Western and Eastern Interconnections. Tri-State owns approximately 600 line miles of transmission facilities in the Eastern Interconnection. These Eastern facilities are currently within the footprint of the Southwest Power Pool (SPP). It is likely that a Western decision related to Upper Great Plains Region (UGP) joining a regional transmission organization (RTO) will have an impact on Tri-State.

Tri-State supports Western's recommendation to pursue SPP membership. Tri-State staff has reviewed the Alternative Operations Study (AOS) and concurs that the study presents a balanced and thorough analysis of the estimated benefits and costs of all three options that Western considered. Based on the analysis, the recommendation is consistent with Western's mission to provide federal power to its preference customers at the lowest cost possible consistent with sound business principles.

The effort expended by UGP staff on the AOS process successfully demonstrates another principle that is essential for the long-term direction of Western. The recommendation to join SPP is a regionally based decision that analyzed costs and benefits for UGP customers, not for the entire Western footprint. Western has demonstrated that joining an RTO is beneficial to the UGP customers. Tri-State would expect no less of an effort from any other of Western's regions if a similar situation arose where that region might consider participating in an RTO.

Thank you for providing the opportunity to engage with Western on a very important decision.

Sincerely

Ronald W. Steinbach  
Senior Manager, Transmission  
Contracts, Rates and Policy

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