



August 30, 2011

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EXECUTIVE DIRECTOR

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

Dear Mr. Harris:

The Mid-West Electric Consumers Association appreciates the opportunity to comment on the Western Area Power Administration's ("Western") Federal Register Notice, "Pick-Sloan Missouri Basin Program – Eastern Division – 2021 Power Marketing Initiative Proposal" (Federal Register, Vol. 76, No. 150, Thursday, August 4, 2011 pp.47180-47181). On April 26, 2011, Mid-West filed comments on Western's earlier Federal Register notice (FR, March 4, 2011) and takes this opportunity to add additional comments not addressed in Mid-West's earlier submission.

The Mid-West Electric Consumers Association was founded in 1958 as the regional coalition of over 300 consumer-owned utilities (rural electric cooperatives, public power districts, and municipal electric utilities) that purchase hydropower generated at federal multi-purpose projects in the Missouri River basin under the Pick-Sloan Missouri Basin Program.

For over ten years, Mid-West's members have contributed funds directly to the federal power program agencies (Western, U.S. Army Corps of Engineers, U.S. Bureau of Reclamation) to ensure generation and transmission reliability. Western's Pick-Sloan customers not only pay, through power rates, for the capital investment in hydropower generation, but also pay for investment in facilities supporting those hydropower generation units. Many of the hydropower facilities in the Pick-Sloan Missouri Basin Program ("Pick-Sloan") are aging and their components are being replaced. With newer, more efficient equipment, there can be an increase in generation.

Since this potential incremental increase derives from refurbishing existing federal hydropower generation units, Mid-West would expect that Western would adjust the resource to include any such increased generation and make allocation offers under the terms and conditions of the 2021 Power Marketing Initiative ("PMI").

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Graves".

Thomas P. Graves
Executive Director