

**UNITED STATES OF AMERICA
BEFORE THE
WESTERN AREA POWER ADMINISTRATION**

**Recommendation of the Western Area Power Administration
Loveland Area Projects and Colorado River Storage
Project To Pursue Final Negotiations
Regarding Membership in a
Regional Transmission Organization**

**COMMENTS OF THE
NEBRASKA PUBLIC POWER DISTRICT**

Pursuant to the Federal Register Notice issued on October 12, 2017, the Nebraska Public Power District (NPPD) hereby submits its comments in response to the recommendation of the Western Area Power Administration (WAPA) for the Loveland Area Projects (LAP) and the Colorado River Storage Projects (CRSP) to pursue final negotiations regarding membership in the Southwest Power Pool (SPP), a Regional Transmission Organization (RTO) regulated by the Federal Energy Regulatory Commission (Commission on FERC).

I. COMMUNICATIONS

NPPD requests that all communications related to this proceeding be addressed to the following persons:

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II. GENERAL DESCRIPTION OF NPPD

NPPD is a public corporation and political subdivision of the State of Nebraska. It is not a “public utility” as defined by the Federal Power Act. NPPD is governed by an 11 person Board that is publicly elected from all or parts of 86 of 93 counties in Nebraska. Pursuant to Nebraska statutes, NPPD is engaged in the generation, transmission and delivery of electric power and energy to wholesale and retail customers throughout the state of Nebraska. NPPD owns and operates an extensive network of 4,500 miles of transmission facilities and related substations. It serves approximately 90,000 retail customers throughout the state and serves the wholesale requirements of 75 municipalities, public power districts and cooperatives. In total, NPPD directly or indirectly provides energy and transmission service to approximately 800,000 Nebraskans.

Effective April 1, 2009, NPPD became a member of the SPP and has transferred operational control of its transmission facilities to SPP, pursuant to the terms and conditions of revisions to SPP’s Bylaws, the SPP Tariff and the SPP Membership Agreement intended to address NPPD’s status as a non-jurisdictional Transmission Owner and the need at all times to remain compliant with state laws and regulations.

NPPD’s interests cannot adequately be represented by any other party. NPPD will be directly affected by any decision in this proceeding. For the foregoing reasons, NPPD respectfully requests that WAPA considers the comments set forth below.

III. COMMENTS OF NPPD

NPPD is concerned about the potential cost impact of WAPA's decision to join SPP. NPPD could be affect by WAPA joining SPP in two ways. First, NPPD is a customer of WAPA for transmission services currently provided by WAPA in Western Nebraska. Second, NPPD is a transmission customer of SPP in Zone 17 located in Nebraska. NPPD needs additional information from WAPA to determine the costs impact upon NPPD of WAPA joining SPP.

Specifically, NPPD needs information concerning how WAPA's existing transmission service provided to NPPD will be affected by WAPA joining SPP. NPPD is concerned about the impact of WAPA joining SPP upon NPPD load currently connected to WAPA transmission lines. How will that load be served when WAPA becomes a Transmission Owner in SPP and what will be the cost of that transmission service?

NPPD also is concerned about the impact of WAPA joining SPP upon the cost of existing SPP transmission service provided to NPPD in Zone 17. For example, if existing load of NPPD and others currently served from WAPA transmission lines is transferred to a new SPP pricing zone where the WAPA facilities are assigned what impact would that shift in load have upon Zone 17 prices?

IV. CONCLUSION

Based on the foregoing, NPPD request WAPA to provide all cost impact studies performed in connection with its recommendations to join SPP and to provide additional cost impact information related to cost shifts and rate impacts upon Wester Nebraska customers of WAPA and SPP.

Respectfully submitted,

Nebraska Public Power District

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Dated: November 27, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December, 2016, I have caused the foregoing to be served upon each party designated on the Official Service List, complied by the Secretary of the Federal Energy Regulatory Commission in this proceeding

/S/ – David D'Alessandro/

David D'Alessandro