

**White Mountain Apache Tribe Comments on CRSP Participation in the MWTG
November 27, 2017**

The White Mountain Apache Tribe (Tribe) provides the following comments in relation to CRSP participation in the MWTG. While the Tribe recognizes the current national trend toward operational regionalization, the Tribe has the following concerns about formal CRSP participation at this time:

The Tribe is concerned with the total lack of any forecast financial benefit for CRSP customers should CRSP participate, even in the form of specific avoided costs; the Tribe is also concerned that the inclusion requires a seven-year mitigation commitment from other participants to hold CRSP customers whole, and that formal support for this is not yet finalized.

The Tribe is concerned with the currently forecast doubling of transmission rates from MWTG participation.

The Tribe would like a better analysis of the value that could be realized by CRSP customers from the Federal Service Exemption, especially after the seven year mitigation period, should that arrangement be confirmed by the other MWTG participants and CRSP join into the scenario.

The Tribe is concerned with the more than \$200 million scale of identifiable estimated benefits to those already participating in the Southwest Power Pool, from the eastern side, as the MWTG benefits appear to heavily subsidize those interests over resulting gains to MWTG or at least CRSP.

The Tribe requests disclosure of the estimated cost to CRSP, as well as the means to cover that cost, should this MWTG consideration process extend into 2018, as SPP is forecasting the imposition of fees should that occur.

The Tribe would like to have reviewed more detail of the process to select SPP over CAISO or any other possibilities.

The Tribe requests the estimated exit costs to CRSP customers, should it elect to withdraw from MWTG after joining.

The Tribe requests that CRSP provide any other cost/benefit detail available but not yet provided.

Lastly, The Tribe requests additional customer dialogue, exclusive of CAISO or other third parties outside the scenario, prior to any decision by CRSP on MWTG participation.