

January 8, 2018

Mr. Steve Johnson
Senior VP and CRSP Manager, Acting
CRSP Management Center
Western Area Power Administration
Via email only: johnsons@wapa.gov

RE: PROPOSED OLMSTED PROJECT RATE ORDER – WAPA-177

Dear Mr. Johnson:

In accordance the Proposed Olmsted Project Rate Order, UAMPS submits the following comments for WAPA's consideration.

UAMPS appreciates the public information forum held by WAPA on November 17, 2017 that reviewed the Proposed Olmsted Project Rate Order.

UAMPS, as representative for its members who are participants in the CRSP project, has the following questions and comments about the rate order.

The Investment and OM&R Costs table presented at the forum was significantly different than what was included in the FRN for the rate order. Please provide information regarding how confident WAPA is in the updated table or what level of possible changes it foresees at this point. Since the contract goes into 2024 would it be possible to provide estimates for two more years to the end of the contract period? Also, three years of \$837,670 of CUWCD Olmsted O&M costs were shown at the forum. It was noted that these costs may be capitalized similar to the CIP Reimbursable \$5,800,000. Please provide clarify how those costs will be handled.

It was stated that at the end of the contract period in 2024, that the project may not be continued per the current plan but may be ended and taken into the CRSP project. Please clarify and explain what options WAPA is currently contemplating for this project. UAMPS opposes any changes that would shift costs to the CRSP project.

UAMPS also reiterates its comments submitted with regards to the Olmsted Power Marketing Plan and supports comments made by CREDA for the same. That is that Olmsted needs to be a stand-alone project and there should not be any costs, now or in the future, shifted to the CRSP project.

Thank you for your consideration.

Sincerely,

Kelton Andersen
Manager of Power Metrics