

LAPTransAdj LAPTransAdj - Public Comment

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To: <laptransadj@wapa.gov>
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Subject: Public Comment

Thank you for the opportunity to comment on the ancillary services changes that Western is considering for implementation on October 1, 2011. Platte River Power Authority (Platte River) would specifically like to comment on the proposal that Western no longer plans to regulate for wind projects that do not synch to load in their Balancing Authority (BA).

Our comments are specific to the Medicine Bow wind generation project located south of the town of Medicine Bow Wyoming. Construction of these existing wind generation facilities began in 1997 and most of the generation is owned by Platte River. The current maximum capacity of the existing wind turbines is approximately 8 MW.

We understand that Western has issues with the amount of regulation required to meet the wind generation requirements of the BA and Platte River does not want to unduly burden Western. However, Platte River requests that Western open communications to pursue options that avoid having to meter the Medicine Bow generation out of Western's BA.

This project was coordinated with Western since its initial planning in the mid-90's and the existing infrastructure for communications and other needs was placed in service based on Western's requirements at the time. The costs associated with metering the Medicine Bow wind project out of the BA appear significant, from both capital and operating/maintenance perspectives. As costs continue to increase – particularly costs that were not expected or communicated when the project was jointly planned – Platte River is concerned about the effects of these costs on our member municipalities and their customers. We hope that Western can give consideration to existing resources vs. new resources; particularly for facilities that are small, were jointly planned, and have operated for many years within the Western BA.

We would like to work with Western to ensure that both entities are supporting renewable resources in a way that considers the unique characteristics and history of each wind project.

Thank you,

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