



November 22, 2017

SENT BY EMAIL

Rodney Bailey  
Western Area Power Administration  
150 East Social Hall Avenue, Suite 300  
Salt Lake City, UT 84111  
[SPP-Comments@wapa.gov](mailto:SPP-Comments@wapa.gov)

Dear Mr. Bailey:

Basin Electric Power Cooperative (**Basin Electric**) appreciates the opportunity to comment on Western Area Power Administration's (**WAPA**) recommendation for the Loveland Area Projects and the Colorado River Storage Project to pursue negotiations regarding membership in the Southwest Power Pool as noted in WAPA's October 12, 2017 Federal Register Notice. Basin Electric provides the following comments for WAPA's review and consideration:

- Basin Electric is a cooperative corporation headquartered in Bismarck, North Dakota. Basin Electric's mission and principle business activities are the generation, transmission, transformation and sale of electricity at wholesale to its G&T and distribution member cooperatives within the states of North Dakota, South Dakota, Wyoming, Colorado, Minnesota, Iowa, Nebraska, Montana and New Mexico. Basin Electric's member systems serve more than three million customers in both the Western and Eastern Interconnections.
- Basin Electric, as a longtime customer of WAPA for firm electric service and as an interconnected transmission owner, is supportive of WAPA's recommendation for WAPA to pursue final negotiations regarding Colorado River Storage Project (**CRSP**), and Loveland Area Projects (**LAP**) membership with Southwest Power Pool (**SPP**), Regional Transmission Organization as a transmission-owning member, and as a participant in the SPP Integrated Marketplace, consistent with CRSP's and LAP's respective statutory requirements.
- Basin Electric supports WAPA's efforts to pursue appropriate Federal Service Exemption requirements for both CRSP and LAP to help mitigate potential negative cost shifts to its firm electric service preference customers, allowing CRSP and LAP to remain focused on their primary objective of delivering firm electric service to their respective preference customers at cost-based rates. Such Federal Service Exemptions should focus on each project's characteristics and requirements of supporting hydropower deliveries from Federal hydroelectric resources, and to support WAPA's other contractual obligations to their respective preference customers.
- Basin Electric supports WAPA's plan to have CRSP and LAP each pursue a membership agreement with the SPP RTO as a transmission-owning member, and as a participant in the SPP Integrated Marketplace.

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Please contact the undersigned either by telephone (701) 557-5319 or [russm@bepc.com](mailto:russm@bepc.com) with any questions, comments or requests for additional information or input.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Russell Mather". The signature is stylized and somewhat cursive, with a large, loopy initial "R" on the left side.

R. Russell Mather  
Assistant General Counsel

rrm/ds