



Sent Via Email

November 27, 2017

Mr. Rodney G. Bailey
Power Marketing Advisor
Western Area Power Administration
299 South Main Street, Suite 200
Salt Lake City, UT 84111
Email: SPP-Comments@wapa.gov

Re: Recommendation for the Western Area Power Administration Loveland Area Projects and Colorado River Storage Project to Pursue Final Negotiations Regarding Membership in a Regional Transmission Organization

Dear Mr. Bailey:

Tri-State Generation and Transmission Association, Inc. ("Tri-State") appreciates the opportunity to comment on Western Area Power Administration's ("WAPA") October 12, 2017 Federal Register Notice on WAPA's Recommendation for the Western Area Power Administration Loveland Area Projects and Colorado River Storage Project To Pursue Final Negotiations Regarding Membership in a Regional Transmission Organization, and provides the following comments for WAPA's review and consideration. Tri-State is a cooperative corporation headquartered in Westminster, Colorado. Tri-State's primary functions involve the generation, transmission, transformation and sale of electricity at wholesale to its forty-three member distribution cooperatives within the states of Colorado, Nebraska, New Mexico and Wyoming. Tri-State's member systems serve more than one million customers in both the Western and Eastern Interconnections.

- Tri-State as a preference customer of WAPA for firm electric service and as a customer of firm transmission service provided by WAPA, is supportive of WAPA's recommendation for WAPA to pursue final negotiations regarding Colorado River Storage Projects ("CRSP") and Loveland Area Projects ("LAP") membership with Southwest Power Pool, Inc. ("SPP") Regional Transmission Organization ("RTO") as a transmission-owning member, and as a participant in the SPP Integrated Marketplace, consistent with CRSP's and LAP's respective statutory requirements.



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

- Tri-State supports CRSP and LAP's efforts to pursue appropriate Federal Service Exemption requirements that help mitigate potential negative cost shifts to its firm electric service preference customers, allowing CRSP and LAP to remain focused on their statutory mission 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.
- Tri-State supports WAPA's plan, that if successful with their respective final negotiations with SPP, would 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.

Thank you again for the opportunity for Tri-State to provide these written comments regarding WAPA's October 12, 2017 Federal Register Notice, Recommendation for the Western Area Power Administration Loveland Area Projects and Colorado River Storage Project to Pursue Final Negotiations Regarding Membership in a Regional Transmission Organization.

Should you have questions and would like to discuss in more detail, please contact Rob Wolaver by telephone at 303-254-3447 and by email at rwolaver@tristategt.org.

Sincerely,

Bradford Nebergall
Senior Vice President, Energy Management

Cc: Joel Bladow
Mary Ann Zehr
Dan Walter
Maude Grantham-Richards