



UPPER MISSOURI G & T

ELECTRIC COOPERATIVE, INC.

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November 18, 2013

Western Area Power Administration
2900 4th Ave North
Billings, MT 59101-1266

RE: Federal Register Notice re: RTO Decision

Upper Missouri G & T Electric Cooperative Inc. (UMGT) provides transmission and ancillary service to ten electric distribution cooperatives, five in Western North Dakota and five in Eastern Montana. UMGT service territory encompasses the heart of the Bakken Oil and Gas Exploration area. UMGT and its Member Systems have seen explosive growth in the past few years; UMGT had 43% sales growth in 2012 and near 30% sales growth in 2013. UMGT increased capacity requirements over the next twelve years is forecast to exceed 1,200MW, ultimately growing to a 1,800MW system.

Access to affordable capacity and energy is paramount for the bustling service territory. Besides oil development, the region serves thousands of legacy ranches, irrigation systems, farms, homes and businesses. We are concerned about the availability of reliable and affordable energy, both for our legacy member-consumers and our new member-consumers.

1. Today, Western and IS affiliates have become a sort of "island" in the electrical grid
2. This separation, gulf, or "seam" limits access to market, both to buy and sell energy
3. This limitation, increases costs to buy when short...and limits buyers or opportunities to sell when long
4. In the end, optimization of Western's resources are compromised, driving costs upward

Therefore, Upper Missouri G & T supports Western's entrance into SPP to gain access to the energy market for long-term rate stability and affordability.

Sincerely,

Claire J. Vigesaa, General Manager

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NO REPLY NECESSARY		
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