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Ms. Rebecca Johnson
Transmission and Power Markets Advisor
Western Area Power Administration
12155 West Alameda Parkway
Lakewood, CO 80228-8213

Re: Notice of Recommendation to Pursue Final Negotiations Regarding SPP RTO Membership
(88 FRN No. 82; April 28, 2023)

Dear Ms. Johnson:

The Arkansas River Power Authority (ARPA) appreciates the opportunity to submit comments in support of the Western Area Power Administration's (WAPA) recommendation to pursue final negotiations to join the Southwest Power Pool (SPP) Regional Transmission Organization (RTO). As I believe you're aware, approximately 90% of the Loveland Area Project (LAP) revenue comes from entities in the RTO expansion initiative, or in the current SPP footprint.

As reported in the "Recommendation Report" the benefits of joining a regionalized market include greater opportunities among market participants; the ability to maintain reliability across the WACM BA; and the ability to better manage WAPA's operating costs and hydropower contractual obligations are overriding arguments for membership in the RTO.

ARPA is a Joint Action Agency headquartered in Lamar, Colorado and provides power and transmission services to six municipal electric systems located in Southeast Colorado. The WAPA allocation for ARPA, and its members, represents a significant percentage of our total power supply resources. The ability of WAPA to manage its costs is critical to the communities and residents we serve.

In addition, ARPA is an active member in the Loveland Area Customer Association (LACA) and fully supports the comments submitted by LACA. ARPA echoes LACA's position that we look forward to additional discussions involving the Mt. Elbert Powerplant, the need to modify current operations, and the potential for more efficient and effective use of this valuable resource.

In closing, we appreciate WAPA's staff's work in evaluating the opportunities the RTO will provide, the communications WAPA has provided regarding this issue, and WAPA's commitment and effort to protect its firm electric service customers.

Sincerely,

Rick Rigel
General Manager