

May 29, 2023

EMAIL: [SPP-Comments@wapa.gov](mailto:SPP-Comments@wapa.gov)

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

Dear Ms. Johnson:

Big Horn Rural Electric Company, Carbon Power & Light, Inc., Garland Light & Power Co., High Plains Power, Inc., High West Energy, Inc., Niobrara Electric Association, Inc., Wheatland Rural Electric Association, and Wyrulec Company (The Wyoming Tri-State Distribution Cooperatives) appreciate the opportunity to provide the following comments that support the Western Area Power Administration's (WAPA) Rocky Mountain Region (WAPA-RMR) and Colorado River Storage Project's (WAPA-CRSP) commitment to pursuing the SPP RTO West. We also support WAPA Upper Great Plains (WAPA-UGP) to expand its participation in SPP in the Western interconnection.

The Wyoming Tri-State Distribution Cooperatives, are 8 of 42 utility members of cooperative power supplier Tri-State Generation and Transmission Association. The Wyoming Tri-State Distribution Cooperatives have service territory in the proposed SPP RTO western expansion footprint in Wyoming. One of Tri-State's resources used to serve our Cooperatives are its CRSP and LAP allocations.

The Wyoming Tri-State Distribution Cooperatives, have advocated for organized markets in the West, and in particular, the expansion of the SPP RTO to the western interconnect, for the cost savings and reliability benefits.

A study conducted by Brattle shows savings and benefits of approximately \$50-\$70M per year for the SPP RTO market footprint. These savings/benefits are nearly entirely realized among WAPA and WAPA preference customers, and their customer's end users. The study showed even higher values including the participation of two non-preference customers within the current Balancing Authority footprint, with the expected value of the SPP RTO is \$70-\$90M per year for the market footprint. There are many other cost savings of the RTO that are not reflected in the study.

The WAPA-RMR Balancing Authority Area (BAA) has done a great job and created tremendous value to its customers through the years. That said, as Tri-State and other utilities add additional intermittent renewable resources, the SPP RTO, with its larger footprint and market, will be necessary to reliably and economically regulate these additional resources. Tri-State's renewable resources are forecast to increase in installed capacity in the current WACM BAA footprint by over 100% in 2025, and other WAPA preference customers and utilities within the BAA will also be adding significant renewable resources. Participating in the SPP RTO helps mitigate these challenges.

There are many other benefits for WAPA participation in the SPP RTO, including a more efficient market for both WAPA and for CRSP customers if the western drought persists. Another significant benefit is the inclusion of an efficient ancillary services market. The benefits of the ancillary services market were not

captured in the Brattle study. In addition, resource adequacy, transmission modernization and renewable resource integration are all more efficient in an RTO environment, supporting regional transmission planning to reduce congestion and provide greater access to existing and new generation.

WAPA's participation in the SPP RTO is the best alternative as western markets evolve that provides huge benefits for WAPA's customers. We greatly appreciate the many years of work WAPA has done to advance an RTO. The Wyoming Tri-State Distribution Cooperatives fully support WAPA-RMR, WAPA-CRSP and WAPA-UGP moving forward in pursuing the expansion of SPP RTO into the West.

Sincerely,

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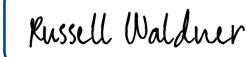
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Jeff Umphlett

General Manager

Big Horn Rural Electric Company

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Russell Waldner

General Manager

Carbon Power & Light, Inc.

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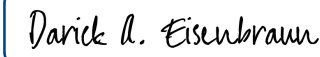
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Molly Lynn

Manager

Garland Light & Power Co.

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Darick Eisenbraun

CEO

High Plains Power, Inc.

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Jared Routh

CEO/General Manager

High West Energy, Inc.

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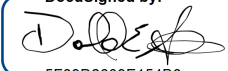
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Shawna Glendy

General Manager

Niobrara Electric Association, Inc.

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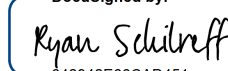
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Donald Smith

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Ryan Schilreff

General Manager

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