

ELECTRICAL DISTRICT NUMBER EIGHT

38401 W. INTERSTATE 8; BLDG 175

GILA BEND, AZ 85337

928-606-9123

ED8@ED8AZ.COM

Rebecca Johnson, Transmission and Power Markets Advisor at (720) 376-2400,
Western Area Power Administration,
12155 West Alameda Parkway
Lakewood, CO 80228-8213.
SPP-Comments@wapa.gov

RE: Comments of the Electrical District Number Eight in response to the Recommendation for the Western Area Power Administration's Rocky Mountain Region and Colorado River Storage Project Management Center to Pursue Final Negotiations Regarding Membership in the Southwest Power Pool Regional Transmission Organization, and for the Upper Great Plains Region to Expand its Participation ("Recommendation") originally published in the Federal Register (88 FR 26298) on April 28, 2023

Dear Ms. Johnson:

Electrical District Number Eight respectfully provides the following to the Recommendation published in the Federal Register (88 FR 26298) on April 28, 2023.

Electrical District Number Eight is a municipal corporation and political subdivision of the State of Arizona, serving wholesale electricity to customers in Maricopa and Yuma County, Arizona.

With resource adequacy being a pressing issue among Lower Basin service providers, Electrical District Number Eight is concerned the recent Federal Register notice may exacerbate the already tenuous situation in the Lower Basin region. CRSP has provided long-term energy and resource adequacy (RA) benefits equitably to both Upper and Lower Basin regions. Recent assessments conducted by the North American Electric Reliability Corporation and Western Electricity Coordinating Council have identified a significant capacity shortfall in the Desert Southwest region. Such capacity shortfall, coupled with increased volatility in the wholesale power markets, increased costs in goods & services, and supply chain disruptions greatly support the need for continued accessibility and affordability of the CRSP Resource for Lower Basin customers. Without the CRSP Resource, the Lower Basin region risks increased resource instability.

RESPECTFULLY SUBMITTED this 9th day of June, 2023.

By Robert C. [Signature]