



WELLTON-MOHAWK IRRIGATION AND DRAINAGE DISTRICT

30570 WELLTON-MOHAWK DRIVE, WELLTON, ARIZONA 85356

TEL: (928) 785-3351

FAX: (928) 785-3389

Wellton-Mohawk Irrigation and Drainage District
30570 Wellton-Mohawk Drive
Wellton, Arizona 85356
(928) 785-3351

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 Wellton-Mohawk Irrigation and Drainage District 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

Wellton-Mohawk Irrigation and Drainage District respectfully provides the following to the Recommendation published in the Federal Register (88 FR 26298) on April 28, 2023.

1. Wellton-Mohawk Irrigation and Drainage District (WMIDD) is a not-for-profit Arizona municipal corporation established by a resolution and order dated July 23, 1951, as adopted by the Board of Supervisors of Yuma County, Arizona in conformity with the provisions of Article 2, Chapter 75, of the Arizona Code of 1939, now codified as Arizona Revised Statutes (A.R.S.) Chapter 19, Title 48, Sections 2901-2923. The resolution and order are filed in Docket 40, Pages 513-521, records of the County Recorder, Yuma County, Arizona. WMIDD serves approximately 3,000 consumers in Eastern Yuma County, Arizona.
2. WMIDD is the Administrative Agent for Yuma Proving Ground's (YPG) Federal Hydropower resources. Yuma Proving Ground is part of the U.S. Army Test and Evaluation Command. YPG's Yuma Test Center (YTC) is one of the largest military installations in the Country.

3. WMIDD and YPG have executed contracts for Firm Electric Service (FES) with the Western Area Power Administration (WAPA) for capacity and energy provided by the Colorado River Storage Project (CRSP).
4. 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 WMIDD's 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 to WMIDD.
5. The Recommendation for the Western Area Power Administration's Rocky Mountain Region and Colorado River Storage Project Management Center (WAPA CRSP) to Pursue Final Negotiations Regarding Membership in the Southwest Power Pool Regional Transmission Organization, must ensure that the attributes of the CRSP resources are preserved for all customers. WAPA-CRSP should condition participation in final negotiations with SPP on an assurance that membership in SPP RTO West will afford all WAPA CRSP customers with the benefits of their FES contracts, regardless of the balancing authority in which the customers reside.¹ Further, WAPA CRSP must indicate that it will not finalize membership in SPP for CRSP if WAPA cannot secure the necessary arrangements to provide the benefits of FES contracts through participation in SPP. Failure to mandate this condition as a prerequisite to WAPA agreeing to final negotiations, would suggest that WAPA does not intend to address the discriminatory treatment and disadvantage to customers located outside of the footprint.
6. In fact, only about 12 percent of CRSP resource would be delivered inside CRSP's prospective SPP zone.
7. Customers such as WMIDD must be assured the same attributes of the CRSP resources will be provided to the customers located inside and outside of the SPP RTO footprint through final negotiations and implementation of readily known technical solutions described in greater detail in the "Colorado River Storage Project Bifurcation – Principles Attachment A".
8. Consistent with Section 1232 of the Energy Policy Act of 2005, WAPA must specifically delineate how any final agreement executed between SPP and WAPA will ensure consistency in delivering the full benefits of existing FES contracts in the final

¹ Notably, this would appear to be a fundamental concern of the majority of CRSP contractors as WAPA has admitted that "only about 12 percent of CRSP resource would be delivered inside CRSP's prospective SPP zone." See Recommendation Regarding Membership in the Southwest Power Pool Regional Transmission Organization at p. 38. Accessed at <https://www.wapa.gov/About/keytopics/Documents/spp-rto-recommendation-report.pdf>.

decision to proceed with negotiations. Failure to respond to this request and document an intent to honor contractual obligations will indicate that WAPA does not intend to honor the terms and conditions of the FES contracts and demonstrate an anticipatory abrogation of WAPA's contractual obligations to FES contractors.

RESPECTFULLY SUBMITTED this 2nd day of June, 2023.

Wellton-Mohawk Irrigation and Drainage District

By: Elston K. Grubaugh
Elston K. Grubaugh
General Manager

ORIGINAL

Referenced notice originally published in the Federal Register (88 FR 26298) on April 28, 2023.

¹ Dynamic Transfer Reference Document, Version 4, Terms – Page IV

https://www.nerc.com/comm/OC/ReferenceDocumentsDL/Dynamic_Transfer_Reference_Document_v4.pdf

Colorado River Storage Project Bifurcation – Principles Attachment A

Executive Summary

The Colorado River Storage Project (CRSP) has provided long-term energy and resource adequacy (RA) benefits equitably to both Upper and Lower Basin regions. Western Area Power Administration (WAPA) CRSP's consideration to join the Southwest Power Pool Regional Transmission Organization (SPP RTO) should ensure that the attributes of the CRSP resources are preserved for all customers. Wellton-Mohawk Irrigation and Drainage District is requesting WAPA negotiate the necessary terms to provide for a "bifurcation" of the CRSP resources so that customers outside the SPP RTO footprint are assured the same attributes of the CRSP resources that will be provided to the customers located inside the SPP RTO footprint.

Principles

- Joining an organized market should not make a WAPA provided resource less valuable for a customer who is located outside of a market footprint.
- WAPA must negotiate with an organized market to ensure the benefits provided under the Firm Electric Service (FES) contracts are delivered regardless of the customer's location.
- Securing Dynamic Transfer of Southern Customers' allocations into WALC is a solution that could be used with hydroelectric projects use and RTO seams.
- CRSP Dynamic Transfer would be accordance with terms of the NERC dynamic transfer electronic signal and integration guidelines. Dynamic Transfer Reference Document Terms¹:
 - Dynamic Transfer Signal (DTS): The electronic signal used to implement a Pseudo-Tie or Dynamic Schedule using either a metered value or a calculated value.
 - Integration: Dynamic Schedule and Pseudo-Tie above means the value could be mathematically calculated or determined mechanically with a metering device and incorporated into the associated ACE calculations for the Attaining and Native BA.
- The Dynamic Transfer would split/bifurcate CRSP resource deliveries between WACM and WALC.
- The Dynamic Transfer would be calculated in accordance with the capabilities and limitations of the CRSP resources and Southern Customers' FES contractual allocations.
- The bifurcation would not allow for a customer to control or dictate project operations, WAPA in coordination with Reclamation would have ultimate control of the generations.
- Customers shall continue to communicate, submit, and make schedule changes in accordance with the CRSP Scheduling, Accounting, and Billing Procedures (SABP).
- CRSP may choose to de-rate real-time parameters to satisfy operations, including the modifications to ramp rates and capacity schedules set forth in pre-defined system operating procedures.
- The Dynamic Transfer bifurcation solution will require communication connectivity, unit testing, integrations, and reporting.
- The bifurcation solution shall not delay Upper Basin entities potential of future SPP RTO participation and shall be transitioned in a manner that allows for proper testing, tuning, and system operating procedure development.