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**COLORADO RIVER COMMISSION
OF NEVADA**

July 7, 2023

Ms. Rebecca Johnson
Transmission and Power Markets Advisor
Western Area Power Administration
12155 West Alameda Parkway
Lakewood, CO 80228-8213
Email: SPP-Comments@wapa.gov

Dear Ms. Johnson:

Supplementary Comments of the Colorado River Commission of Nevada Concerning 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.

On June 27, 2023, WAPA hosted a narrowly focused webinar and Q&A session concerning the pseudo-tie proposal made by some of WAPA-CRSP's customers. WAPA-CRSP is seeking public comment on 1) the pseudo-tie proposal and 2) whether WAPA should conclude the current public process and consider updating WAPA's recommendation by taking the following steps:

- Communicate and coordinate with SPP and SPP RTO West participants.
- Engage customers to explore future market options, such as UGP/RM pursuing final negotiations with SPP without CRSP.
- If an updated recommendation is developed, WAPA would initiate a new public process to seek comments from its customers, Native American Tribes, and other stakeholders on the substance of the recommendation.

The CRCNV offers the following comments in response to Question #1 concerning the pseudo-tie proposal.

WAPA Should Continue Development of the Pseudo-Tie

The CRCNV appreciates the discussions and preliminary work that has been done to date on the implementation of a pseudo-tie between WAPA-CRSP and WAPA-DSW and believes that continuing to develop the proposal is a worthwhile endeavor. The CRCNV continues to believe that a technical solution may be needed in the future to ensure that WAPA can continue to meet its contractual commitments and lower basin customers are not disadvantaged by being located outside of the SPP footprint. However, there are many details about the pseudo-tie proposal that have yet to be determined including the cost and timeline for implementation and SPP's willingness to support the proposal. Additional time is needed to continue developing the proposal. Therefore, the CRCNV recommends that WAPA continue development of the pseudo-tie in parallel with, but not as a condition to, WAPA's entry into the SPP market. If WAPA is unable to implement the pseudo-tie proposal, or if it is determined that it is needed on day one of market participation but can't be implemented right away, it will be incumbent upon WAPA to work with SPP and its customers to develop alternative solutions that ensure that WAPA can meet its contractual commitments and customers in the lower basin are not disadvantaged by being located outside of the SPP footprint.

If you have any questions, please contact Gail Bates at (702) 496-3162, or email gbates@crc.nv.gov.

Sincerely,



Gail A. Bates
Assistant Director, Hydropower
Colorado River Commission of Nevada

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