



July 11, 2023

Rebecca Johnson
Transmission and Power Markets Advisor
Western Area Power Administration
12155 W. Alameda Pkwy
Lakewood, CO 80228-8213

RE: MEAN Additional Formal Comment for WAPA's Federal Register Notice (FRN) – Recommendation for the Western Area Power Administration's Rocky Mountain Region (RMR) and Colorado River Storage Project (CRSP) Management Center to Pursue Final Negotiations Regarding Membership in the Southwest Power Pool Regional Transmission Organization, and for the Upper Great Plains (UGP) Region to Expand Its Participation, specifically CRSP's participation in the SPP Regional Transmission Organization (RTO)

Dear Ms. Johnson,

The Municipal Energy Agency of Nebraska (MEAN) appreciates the opportunity to provide comments specific to the Additional Information and Discussion Related to CRSP's Participation in the SPP RTO as presented on June 27, 2023. These comments are in addition to the formal comments MEAN submitted on June 12, 2023.

MEAN's participants include municipalities (and one public power district) which serve approximately 101,000 residential, commercial, institutional, agricultural, and industrial customers representing a total population of approximately 177,000. Among MEAN and its participants, there are numerous contractual relationships with WAPA including transmission service agreements, and Firm Electric Service (FES) contracts with CRSP, LAP, and UGP.

MEAN's geographic footprint covers the states of Colorado, Iowa, Nebraska, and Wyoming, and MEAN operates in MISO, SPP, and the West (WEIS and bilateral markets). Several MEAN participants have LAP and UGP FES allocations, and thus MEAN has firsthand experience with a WAPA region serving FES customers located in Western Nebraska that were part of the RTO transition to the SPP Integrated Marketplace in 2014. In 2015, our Nebraska participants with UGP FES allocations transitioned with the Integrated System coming into SPP in 2015. The transition of UGP into SPP RTO was seamless for our participants both within and outside the SPP Balancing Authority (BA), with UGP FES agreements and associated rights having not been impacted. WAPA remained true to its mission and its commitment to customers; the FES agreements were not changed through these integrations and customers did not lose their capacity or energy guaranteed to them by WAPA in their agreements. It is important to note that all of this occurred without the additional expense of a pseudo tie.

MEAN was actively engaged in the development of SPP's Resource Adequacy program and witnessed SPP's support of FES agreements and ensuring that WAPA UGP, LAP and SWPA customers continued to receive the full entitlements of their agreements and retained all rights as the SPP Tariff Attachment AA was developed for the Resource Adequacy Program. Based on the information noted above, MEAN feels that all CRSP customers, both those that would be inside the SPP Regional Transmission

Organization West (RTOW) and those that would be outside the SPP RTOW, would continue to receive their full entitlements and rights under their FES agreements without the need for a pseudo tie.

WAPA has indicated they have received comments from customers that without a pseudo tie, the CRSP resource would not receive capacity credits in another BA. During the 30+ meetings that CRSP held over the course of over two years with its FES customers there was little to no detailed information, documentation or concerns presented regarding the need for a pseudo tie. If a pseudo tie is necessary, it would be helpful for relevant information to be posted on WAPA's SOUTHWEST POWER POOL RTO MEMBERSHIP EXPLORATION page for all CRSP customers to understand the need for the pseudo tie and the potential costs that could be incurred to support it.

MEAN feels that any discussion on a NERC/WECC compliant solution, including a pseudo tie, and/or any associated costs that WAPA would incur related to these efforts which would be passed on to its customers should be identified and provided to customers through a collaborative, open and transparent process. MEAN supports WAPA committing to work with its customers to develop a NERC/WECC compliant solution and should take this step with SPP as part of entering final negotiations with SPP.

MEAN believes that it is essential for CRSP to be part of the RMR/UGP action to join RTOW, and without CRSP the RTOW action would likely not move forward. This could leave WAPA, MEAN, and others with limited and less desirable options which will likely be more costly, may provide fewer benefits, and may not allow for the specific needs of WAPA.

I appreciate that WAPA has taken extra steps to address concerns of all WAPA CRSP, RMR, and UGP customers.

Robert L. Poehling
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