



July 11, 2023

EMAIL: 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:

Tri-State Generation and Transmission Association, Inc. (Tri-State) appreciates the opportunity to provide additional comments in accordance with the extension of the comment period provided by Administrator LeBeau's letter of June 14, 2023, in support of the Western Area Power Administration's (WAPA) recommendation to pursue final negotiations to join the Southwest Power Pool (SPP) Regional Transmission Organization (RTO).

Tri-State is a cooperative power supplier of 42 distribution cooperatives that serves more than one million consumers in Colorado, Nebraska, New Mexico and Wyoming. Tri-State participates in the SPP RTO (in Eastern Interconnect Nebraska and Colorado) and has a large portion of its territory in the proposed SPP RTO western expansion footprint (in Colorado, Wyoming and Nebraska). Tri-State receives its Colorado River Storage Project's (CRSP) and Loveland Area Projects (LAP) allocations in Wyoming, Colorado, Nebraska and New Mexico. In addition, Tri-State and its members also participate with CRSP and LAP in benefit crediting arrangements with seventeen Native American tribes and pueblos. Tri-State is also a transmission customer of both CRSP and LAP. Tri-State is strongly committed to the success of WAPA as a whole.

Part of Tri-State's CRSP allocation is delivered outside of the proposed SPP RTO footprint. It is delivered in New Mexico in part of the CAISO's Western Energy Imbalance Market (WEIM) footprint. Tri-State is not aware of, and does not have, any concerns continuing to have part of its CRSP deliveries outside of the CRSP generating resources' host balancing authority (currently WACM and prospectively SPP RTO).

Tri-State understands that some CRSP customers served in the Southern Division of the Colorado River Basin have concerns regarding WAPA's ability to meet contract requirements outside of the SPP footprint. We agree with the statement by the Colorado River Energy Distributors Association that customers should be afforded the benefits of their FES contracts, regardless of the balancing authority area in which the customers reside. SPP's standard pseudo tie tariff provisions appear to provide the means to address these concerns. WAPA should commit to work with its customers to develop a NERC/WECC compliant pseudo tie solution with SPP as part of implementing the expansion of the SPP RTO into the West. For successful negotiation with SPP, it is important that WAPA have the support of CRSP customers both inside and outside of the anticipated footprint.

Finally, with reference to the WAPA June 29, 2023 "*CRSP Crosswalk of the Pseudo-Tie Proposal*", Tri-State agrees with WAPA in **not recommending** the bifurcation of the CRSP system North and South.



Tri-State appreciates that WAPA has taken the time to present meaningful SPP RTO topics for discussion with its customers. WAPA staff should be commended for the time and dedication they have put forward in this multi-year effort to bring the value of an RTO to its customers. As a utility that has also been involved in this proposed SPP RTO expansion (and the previous MWTG attempt), Tri-State appreciates just how much time and work has been dedicated to this effort. Tri-State fully supports WAPA-RMR, WAPA-CRSP and WAPA-UGP moving forward in pursuing the expansion of SPP RTO into the West.

Sincerely,

Duane Highley
[Duane Highley \(Jul 11, 2023 13:27 MDT\)](#)

Duane Highley
Chief Executive Officer