



Central Power Electric Cooperative, Inc.

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January 17, 2013

Anita J. Decker
Acting Administrator
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Subject: Comments on the Draft Recommendations of the JOT

Dear Ms. Decker,

Central Power Electric Cooperative serves six electric distribution cooperative member-owners who in turn serve over 55,000 retail consumer-owners across 25 counties in the central and southeastern third of North Dakota. We are a preference customer of the Western Area Power Administration and a member-owner of Basin Electric Power Cooperative, our supplemental requirements power provider. We are herein filing comments to the Draft Recommendations of the Joint Outreach Team to voice our concerns with the results of this top-down initiative.

We understand that many of the JOT recommendations are already being studied by the Western Area Power Administration and believe that these ongoing current efforts should be pointed out in the report, recommendation by recommendation, to give credit where credit is already due.

As a preference customer of Western, we are very concerned about the cost and the burden on Western staff that these JOT recommendations might impose and we surely do not want it to compromise IN ANY WAY the ability of Western to meet its core mission responsibilities. We note that there does not appear to be any costs of carrying out the studies identified in the JOT recommendations and how that cost will be paid for and from where the funds will be derived. In any event, further development of JOT recommendations should be conducted by Western in cooperation with its customers.

Our concern about cost implications goes beyond the cost of the study efforts themselves but also to the potential consideration of transmission rate consolidation between Western regions. This is in potential conflict with projects' statutory authorities and responsibilities. In an effort to save time and expense, we believe Western should conduct a thorough legal review of whether or not these recommendations even can be implemented before moving forward with studies on them.

Western's core mission is the marketing and delivery of federal hydropower to preference customers at the lowest possible rate consistent with sound business principles. We are very concerned that the draft recommendations do not necessarily support this core mission which makes them appear to be of little to no benefit to us as a preference customer and this then goes back to the potential for additional costs without benefit concern.

Again, thank you for this opportunity to provide our comments and concerns.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Thomas L. Meland".

Thomas L. Meland, P.E.
General Manager

cc: Central Power Board of Directors