

Anita Decker, Acting Administrator

Ms. Decker

Please accept this correspondence as the comments of Clay-Union Electric Corporation concerning the draft recommendations of the Western/DOE Joint Outreach Team (JOT).

Clay-Union Electric is a distribution cooperative headquartered in Vermillion, SD. We serve approximately 2800 members over a 900 square mile territory utilizing nearly 1200 miles of overhead and underground equipment. We are an owner/member of East River Electric of Madison, SD and thus have significant interest in preference power issues. Approximately 20% of the electricity consumed by our members comes from the main stem dams located on the Missouri River. This reliable and affordable source of power plays a significant role in keeping our costs affordable to our members and we would have serious reservations of any action which would disrupt the present operating procedure.

Many of the JOT recommendations are currently being studied by WAPA and each JOT recommendation should include a description of ongoing WAPA studies that are already addressing said issues.

Nothing comes without a cost and the JOT recommendations need to include cost estimates for pursuing each recommendation and demonstrate the budgetary impact thereof.

Since some of the JOT recommendations appear to be in conflict with current statutes there needs to be a thorough legal review to determine if legislative action is a pre requisite to enacting any recommendation.

The jointly owned transmission system commonly referred to as the Integrated System has worked effectively and efficiently since its inception in 1963. While we should always be willing to embrace meaningful progress, dismantling an effective system for the sake of change serves no purpose and is, in fact, very regressive. Restructuring must be able to provide new efficiencies and if such efficiencies are not articulable the restructuring MUST be reconsidered.

It is has been said many times and in many ways but the message remains as sound today as ever; If it Ain't Broke, Don't Fix It!!

Thank you very much for your attention and consideration to this issue.

Respectfully Submitted,

John Gors

Manager

Clay Union Electric

P.O. Box 317

Vermillion, South Dakota 57069

Phone #605-624-2673

Email: jagors@clayunionelectric.coop