



# Montana Electric Cooperatives' Association

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Thank you for the opportunity to comment on the JOT's draft recommendations to Secretary Steven Chu regarding Western Area Power Administration.

Our member retail electric distribution cooperatives serve nearly 50 percent of Montana's electricity consumers. Many of those cooperatives are long-time customers of WAPA.

Our comments and requests regarding the draft recommendations are as follows:

- They are so broadly written we believe they are highly vulnerable to misinterpretation. Please provide sufficient specificity to leave no room for doubt about the importance of preventing economic harm to Montana's electric cooperatives and other federal preference customers of WAPA as part of any final directives issued by DOE on this matter;
- There is a lack of recognition regarding the significant, current progress of WAPA toward meeting the objectives outlined in Secretary Chu's March 16, 2012 memorandum. Please list these specific accomplishments;
- As currently worded, the draft recommendations could lead to drastic change in WAPA's mission and purposes. Please underscore in the final recommendations the intent to see only incremental change in the areas of concern identified in the document;
- The draft recommendations do not explicitly recognize a key ingredient to the success of WAPA and any future objectives it undertakes; that being the continued existence of a healthy, working relationship between WAPA and its customers. In the final recommendations, please make JOT's concurrence on the essentiality of that relationship clear to meeting any directives issued by DOE;

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- The ability of WAPA administrators to be able to prioritize the incremental changes sought and to set these priorities through a process of extensive discourse with WAPA customers is critical to the attainment of objectives in the most prudent manner. Please clarify the DOE's support for this prioritization process;
- The draft recommendations do not discuss the prominent position that the principle of "beneficiary pays" must play in WAPA decision-making and do not recognize the fairness of the existing requirement that beneficiaries be identified. Please specify or reiterate support for this process, which ensures the costs of investments are spread only to those entities that are "cost causers."

Thank you for your consideration of Montana Electric Cooperatives' Association's comments on this matter. We look forward to final recommendations that clearly recognize the validity of our concerns.

Best Regards,

A handwritten signature in black ink, appearing to read "Dave M. Wheelihan". The signature is fluid and cursive, with a prominent initial "D" and a long, sweeping underline.

Dave Wheelihan  
CEO  
Montana Electric Cooperatives' Association