Minnkota Power
MPC COOPERATIVE, INC.
Your Touchstone Energy® Partner

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Anita Decker, Acting Administrator
Western Area Power Administration
P.O. Box 281213, Lakewood, CO 80228-8213
Via Email Transmission: JOT@wapa.gov

Thank you for the opportunity to comment on the Joint Outreach Team (JOT) draft recommendations. Minnkota Power Cooperative (Minnkota) is a regional generation and transmission cooperative serving 11 member-owner distribution cooperatives. Minnkota has operating agreements and joint ownership of transmission facilities with the Northern Municipal Power Agency (NMPA), a not-for-profit joint-action agency serving twelve municipal utilities. Minnkota's service area of 34,500 square miles is located in eastern North Dakota and northwestern Minnesota. Minnkota holds the WAPA (Western) allocation for NMPA and the distribution cooperatives for the benefit of all members.

Minnkota expresses the following concerns and reservations regarding the JOT recommendations:

- Minnkota is concerned about the cost and the burden on Western staff to undertake JOT recommendations without compromising the ability of Western to meet its core mission responsibilities. The JOT recommendations need to include cost estimates for pursuing each recommendation, and what the budget impacts of those cost estimates are.

- The draft recommendations do not align with Western's core mission – the marketing and delivery of federal hydropower to preference customers at the lowest possible rate consistent with sound business principles. The expanded mission envisioned by the JOT recommendations offers little for Western's preference customers, while threatening additional costs unrelated to Western's core mission.

- Some of the JOT Recommendations appear to conflict with projects' statutory authorities and responsibilities (e.g. inter-regional transmission rate consolidation).

Thank you for the opportunity to provide comments as to why the JOT approach does not sufficiently recognize Western's role and responsibility in marketing and transmitting federal power to its preference utilities.

Sincerely,

Stacey Dahl

Stacey Dahl
Manager of External Affairs