



Memorandum

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SECRETARY/TREASURER

THOMAS P. GRAVES
EXECUTIVE DIRECTOR

To: DOE Joint Outreach Team
Ms. Anita Decker, Acting Administrator
Western Area Power Administration

From: Thomas P. Graves, Executive Director 

Re: "Defining the Future" Comment Period

Date: October 30, 2012

The Mid-West Electric Consumers Association requests an extension of the comment period on the Joint Outreach Team ("JOT") draft recommendations to the Secretary of Energy of at least sixty days.

The Mid-West Electric Consumers Association was founded in 1958 as the regional coalition of over 300 consumer-owned utilities (rural electric cooperatives, public power districts, and municipal electric utilities) that purchase hydropower generated at federal multi-purpose projects in the Missouri River basin under the Pick-Sloan Missouri Basin Program.

Throughout the workshops and listening sessions of "Defining the Future," Mid-West and its members have expressed deep concerns over the assumptions in this initiative; and have been frustrated by a process that has been unnecessarily rushed and lacking in true opportunity for meaningful input and dialogue.

On September 7, JOT conducted a wrap-up webinar and noted that sometime in early November, the JOT will be publishing draft recommendations in the Federal Register. During the Webinar, JOT stated that there would be a thirty day comment period for customer and stakeholder review of the JOT findings; and JOT would be expecting to finish their work in another thirty days.

There is no reason to continue this mad rush in soliciting customers' comments on JOT's draft recommendations or in JOT's schedule for finishing its work. Given the complexity of the issues addressed in "Defining the Future" both customers and the JOT should have more time to analyze and assess what issues should continue to move forward.

There are circumstances beyond “Defining the Future” that also militate against such a brief review period. The coming “lame duck” session of Congress will consume a great deal of everyone’s time, DOE staff and customer alike. Furthermore, the calendar schedules between now and the end of the year, include two major holidays, for which many have already made their plans. Given the potential magnitude of some of DOE’s proposals, we think that “getting it right” is more important than meeting an arbitrary deadline.

Mid-West and its members devoted a great deal of time and expense over the summer to participate in the workshops and listening sessions. Even there, it was apparent that many of the issues under consideration were far more complex than many had originally thought. It makes little sense for DOE to provide such a brief comment period for what appears to be a series of major initiatives.

Mid-West values its long history of working collaboratively with the Western Area Power Administration to address federal power issues. We would like to ensure that this comment period presents the same opportunity to work with Western. One step toward that goal would be the extension of the comment as noted above.

Another step in that direction would be for DOE to publish JOT’s final recommendations, along an explanation of JOT’s assessment of comments made during the workshops and listening sessions. This is particularly important given the inexperience of DOE’s JOT members and DOE’s steadfast refusal to review statutes and authorities of the Western Area Power Administration.