

Supplemental Request of the National Rural Electric Cooperative Association for an Extended Comment Period on the Draft JOT Proposal to Secretary Chu

The National Rural Electric Cooperative Association respectfully requests a comment period of at least 60 days on the Department of Energy (“DOE”)/Western Area Power Administration’s (“WAPA”) Joint Outreach Team (“JOT”) draft recommendations to Secretary Steven Chu regarding the implementation of his March 16, 2012 Memo (“Chu Memo”). As NRECA noted in its August 17, 2011 Comments, NRECA believes that a comment period of 60 days will be necessary to allow those directly affected by the JOT’s recommendations the opportunity to thoroughly evaluate the substance of the proposal and provide meaningful input to the Department. Additionally, if the draft recommendations require significant technical, economic, or other complex analysis, NRECA may seek additional time to ensure that preference customers have a reasonable opportunity to submit comments that appropriately respond to the draft recommendations.

Given the technical nature of Secretary Chu’s initiative, the potential economic impact of the proposal on preference customers and other stakeholder groups, and the fact that the comment period may be abbreviated due to holiday schedules/travel and other unforeseen variables, a comment period of at least 60 days will be critical to allow those directly impacted by the JOT’s recommendations the opportunity to thoroughly evaluate the substance of the proposal and provide meaningful input to the Department.

In addition to our request for a sufficient comment period, we again strongly recommend that the Administration issue a Federal Register notice containing the final recommendations to the Secretary that discusses the comments DOE receives on the draft recommendations and explains why the JOT accepted or rejected those comments in developing the final recommendations. Only such a process, that tracks the requirements of the Administrative Procedure Act (“APA”) for formal rulemakings, will provide the transparency that impacted preference customers deserve and DOE has said it supports in this process.

Thank you for your consideration of this request.

Sincerely yours,

/s/

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