



# Montana Electric Cooperatives' Association

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October 23, 2006

Ms. Rose Hargrave  
Policy Director  
CENWD-PDM  
12565 West Center Road  
Omaha, NE 68144-3869

Dear Ms. Hargrave:

Thank you for the opportunity to comment on the "Proposed Framework for Establishing the Missouri River Recovery Implementation Committee."

Montana Electric Cooperatives' Association is comprised of 25 electric distribution cooperatives serving nearly half the State of Montana's population with a large number of our cooperative customers served by electricity supplied from Missouri River main-stem dams. Thus, wholesale power rates set by Western Area Power Administration have a significant impact on the Montana economy, including the struggling economies of rural Montana served by electric cooperatives.

Following are our chief concerns with the draft framework:

- The proposed process is extended over too long a period of time, despite calls from biologists for urgent action. Moreover, the delay in definitive action leaves stakeholders uninvolved in adaptive management for almost two years;
- Much of the work outlined under the process is unnecessarily duplicative of work already conducted by the Plenary Group last year;
- The task assigned to the proposed Missouri River Recovery Implementation Committee (MRRIC) is too broad, resulting in a divisive debate over the committee's mission that will be counterproductive to the stated goal of achieving recommendations via consensus;
- The proposal to have non-governmental committee members appointed by the Federal Working Group is a mistake waiting to happen because it creates a clear potential for a conflict of interest in such appointments. To ensure establishment of a committee that is highly objective in its deliberations, the Secretary of Interior should be assigned the responsibility of making appointments.
- The proposed composition of the committee is unbalanced. The electric power industry is under-represented and it appears the

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environmental/conservation and recreational interests are over-represented.

In closing, thank you again for the opportunity to present our viewpoints on this matter so vitally important to Montana's electric cooperative member-owners. We appreciate your consideration of these comments as you work to finalize the MRRIC framework.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dave M. Wheelihan".

Dave Wheelihan  
CEO