**CCAA Implementation Call with NRECA Members**

**June 3, 2020**

**Summary**

CCAA Applicants To Date:

* East Central Energy applied during the early enrollment period after concluding the benefits (fee discount; helping to preclude monarch listing) outweighed potential risks, particularly after evaluating that the co-op was already implementing much of what is required in the CCAA through its integrated vegetation management program.
  + No federal lands to enroll
  + Didn’t see downside to enrolling everything, that way you have coverage everywhere
  + Already have comprehensive IVM program and not pursuing habitat restoration on landowners’ property, therefore not notifying underlying landowners about CCAA specifically because they’re not really doing anything differently; instead, expect CCAA to help with gaining credibility with members

Planning to Apply/Enroll in CCAA:

* Hoosier Energy plans to move forward with a CCAA application (enrolling 4,500-5,000 acres) after assessing that it is already implementing much of what is required under the CCAA and it is a low-cost option to hedge risk of regulatory uncertainty depending on FWS decision to list the monarch. Hoosier is working with Cardno on completing the application before the end of June and to design its reporting framework.
  + Will have federal lands to enroll (national forest)
  + Talking about what type of PR campaign to promote CCAA enrollment, expect will promote better relationships on easements and communication across the board
* Wolverine plans to apply as part of a consortium with its distribution members but will need board approval from each which is not expected to occur until late 2020.
  + Will have federal lands to enroll (national forest)
  + Expect to keep implementation cost down by reseeding transmission line rebuild capital projects with pollinator seeds
  + Will start with enrolling just Transmission lands, and wait to see about enrolling later any Generation lands depending on future land use decisions

Considering Enrollment, but Waiting for FWS Listing Decision to Decide:

* Dairyland waiting to see what the listing decision is but is working on a cost-benefit analysis to look at the costs if they do not sign on, how many potential projects would be impacted by a listing, potential construction delays, cost of getting ITPs, versus the costs associated if the monarch is listed and they do sign on. Will work with a consultant to complete the analysis
  + Does not have IVM program right now,
  + Looking at whether CCAA participation would require additional employees, training; see a lot of PR benefit; factoring in the annual fee; looking at if they would need to hire someone to manage a consortium
* NCEMC waiting to see what the decision is; has minimal Transmission ROWs and would expect participation would ultimately be to cover the distribution coops possibly through a consortium, or providing info to them for their own participation
* Georgia Transmission still evaluating whether to enroll, the maintenance dept is currently looking at it, may hire a consultant to manage application
* Minnkota currently looking to await the December listing decision to enroll or not. Right now, planning on a consortium as their member-owners have expressed interest in this, with Minnkota being the primary. Unsure as of yet how that would be coordinated and structured. Minnkota cannot enroll the entire system due to the vast majority crossing actively farmed (tilled) lands. Preliminary planning includes the combined use of enhanced vegetation management, on available ROW lands, substations, and other portions of owned lands.

Considering Applying as part of a Consortium:

* Dairyland
* Wolverine
* ODEC – working with statewide to decide who will be consortium lead
* Associated
* Minnkota

Obstacles to Enrolling that Coops are Thinking about

* Land agreements or easements -- legwork to gain permission for the vegetation management requirements
  + May depend on the extent to which existing the existing vegetation management is the same as what is required under the CCAA
* Tri-State looking at feasibility of attaining 10% cover of nectar resources on adopted acres due to arid conditions; may not be able to do herbicide treatments on easements and only on owned lands
  + Possible to limit scope of enrolled lands
  + Adaptive management triggered at the programmatic level and not at the partner level

Other takeaways:

* No co-op indicated that their plans for enrollment had been seriously changed because of the covid pandemic.
* No co-op indicated they had decided against enrollment because of changes made to the final agreement as compared to the draft shared last year.
* Members interested in holding approx. monthly calls to discuss CCAA implementation issues.
* Members interested in NRECA maintaining a list of CCAA applicants/enrollees and the POCs at each co-op for members to directly reach out to each other with questions.