

October 31, 2014

TO: NRECA Board of Directors
Distribution CEOs
Statewide Managers
G&T Managers

FROM: Jo Ann Emerson

EPA Asks for Comment on Other Approaches to GHG Rule

EPA released a Notice of Data Availability this week asking for input on four questions about the proposed existing power plants GHG rule. The questions include: phasing in a transition to natural gas; consideration of new natural gas combined cycle units; and expanded approaches to renewables. We're reviewing and will submit comments on December 1, since EPA is not extending the public comment deadline to address these new questions. Overall, some of the questions appear to be moving in the right direction (like phasing in natural gas rather than facing an abrupt cliff in 2020), while others could make the proposal worse (such as expecting new gas to units to displace coal).

'All-of-the-Above' Campaign Update: Keep Sending a Loud and Clear Message

You're about to pass the 1.1 million mark in grassroots comments to EPA through Action.coop and TellEPA.com. Check your progress on [messages](#) and the state [tallies](#). Wiregrass Electric Cooperative (AL) used [social media](#) and other resources to collect 250 messages among 450 members at its annual meeting. The grassroots strength you have built this year is truly impressive and will boost our collective efforts on a range of co-op issues in 2015 and beyond.

Encourage Co-op Members to Vote This Election Day; Congress Expected Back Soon

Please take time to vote and encourage your co-op members to vote in the general elections on Tuesday. Ten close races will decide Senate control: Alaska, Arkansas, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, New Hampshire and North Carolina. The House elections include several hotly contested seats. See the ACRE®-supported congressional [candidates](#) in your state. Congress returns after Veteran's Day for a lame-duck agenda that includes the unfinished FY15 appropriations bills. The House and Senate will also choose their leaders for the upcoming 114th Congress.

Co-ops Urge FERC to Keep Wholesale Power Market Price Caps and Safeguards

A big thank you to Old Dominion Electric Vice President Ed Tatum and North Carolina Electric Membership Corp. Associate General Counsel Charles Bayless for presenting co-op positions at FERC's technical conference on regional power market rules and practices. We're recommending that FERC maintain price caps on wholesale power markets and continue measures to guard against high electric prices. The workshop was the latest in a series to hear recommendations for energy market reforms to address the major costs and fuel delivery

problems utilities faced in the struggle to meet record demand during the extreme cold last winter.

We're Pressing STB, FERC to Fix Railroad Problems Affecting Western Coal

I signed industry letters urging the Surface Transportation Board (STB) and Federal Energy Regulatory Commission (FERC) to address freight railroad problems threatening grid reliability in regions that depend on Western coal shipments. I asked STB to require Burlington Northern-Santa Fe to start a comprehensive coal service recovery plan to address problems outlined in the Western Coal Traffic League's petition. I also joined in asking FERC to hold a public workshop on BNSF's problems with Western coal shipments.

Cyber Chief Agrees with Co-op Position on Improving Information Sharing

We welcome comments by U.S. Cyber Command Commander Admiral Michael Rogers and other cybersecurity leaders on streamlining government and private sector cyber information-sharing to ensure critical infrastructure operators get timely and actionable information. He joined Senate Intelligence Committee Chair Feinstein (D-CA) and Ranking Member Chambliss (R-GA) in calling for Congress to pass their cybersecurity information-sharing legislation that NRECA actively supports.

We're still pressing the Senate to pass a bill (statement attached) and move this issue to conference with the House-passed bill. We're emphasizing that electric co-ops support bipartisan legislation that will help the government and private sector voluntarily share cyber threat information. Please tell your senators that you support this legislation.

FirstNet Network Plans Should Recognize Electric Co-ops

We filed comments urging the National Telecommunications and Information Administration to ensure the FirstNet Responder Network includes an appropriate definition of "rural areas" and the procurement process is open and transparent. We also emphasized that electric cooperatives should be recognized as potential partners to build out and manage the network.

NRECA Solar Webpage Offers Resources for Co-ops

Check out the solar energy resources for electric co-ops on the new Solar Utility Network Deployment Acceleration Project [webpage](#) launched by NRECA's Business and Technology Strategies Department. It offers resources for co-ops considering utility-scale solar projects. We also have many other technology [resources](#) available for co-ops.

Attached: Letters to STB and FERC, cybersecurity legislation statement.