

August 19, 2016

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

Louisiana Electric Co-ops Heroic in Flood Recovery Efforts

Our hopes and prayers are with [electric co-op colleagues in Louisiana](#) working heroically to restore power in their communities and comfort people forced from their homes by catastrophic flooding. At least three dozen Louisiana statewide and local co-op employees and their families face the hardships of their homes being overwhelmed by torrential rainfalls that a meteorologist estimated at 6.9 million gallons just during the previous week. If you wish to send a donation: “**Hurricane Relief Fund**” c/o ALEC, 10725 Airline Highway, Baton Rouge, LA 70816.

Co-ops Vote Hitting Its Stride

At the midpoint of [Co-ops Vote](#) “Employee Engagement Month,” we are excited to hear about diverse approaches taken by co-ops all across the country. Almost three dozen electric co-ops have achieved [5-Star Co-op](#) status (see [co-ops](#)) for activities promoting Co-ops Vote participation and we’re hearing from more each day. Our [Co-ops Vote online resources](#) include the [Employee Engagement Digital Toolkit](#) and other materials to help encourage your members to be co-op voters on Election Day.



To help underscore the importance of voting, I wrote an op-ed that ran in [The Hill](#) highlighting the Co-ops Vote program.

RUS Clarifies Limited English Proficiency Compliance and Upcoming Webinars

The Rural Utilities Service issued a letter (attached) to all program borrowers and participants to clarify compliance requirements for the Limited English Proficiency Guidance issued late July. After discussions with NRECA, RUS withdrew its request for borrowers and participants to sign a certification form acknowledging their obligation to comply with the guidelines. RUS is also hosting [webinar](#) sessions (sign in as a guest) on August 23, 25 and 30 and September 1 to explain why the [agency is taking action](#) to ensure that borrowers and participants provide “meaningful access” to their programs for people with limited English skills. We recommend that electric co-ops participate in one of the sessions to get additional clarity and context.

Electric Co-ops to Argue Points Against GHG Rule in Appeals Court Next Month

The D.C. Circuit Court of Appeals plans to take an unusual 3-1/2 hours to hear challenges by NRECA, 39 G&T co-ops and others challenging the [Clean Power Plan](#) (CPP) during oral

arguments on September 27. All but two circuit judges (who recused themselves) will hear arguments on five major issues about EPA's flawed greenhouse gas rule. With all lawsuits combined into one case, the court assigned time allotments for counsels based on suggestions by the parties. NRECA's outside legal counsel Thomas Lorenzen will address concerns that the final CPP rule included provisions that were not offered for comment during the rulemaking process nor were logical outgrowths of EPA's proposal. The court could require EPA to address that issue by re-proposing the rule. Last February, the U.S. Supreme Court issued a [stay](#) of the CPP rule until legal challenges are resolved. For questions, contact NRECA's [Rae Cronmiller](#).

NRECA Supports Hydropower Provisions in Energy Bill Conference Committee

NRECA joined a hydropower coalition letter (attached or link) to House and Senate energy leaders urging that hydro provisions are retained in comprehensive energy legislation. The letter emphasized the importance of ensuring that several House and Senate hydropower provisions are included in the energy bill conference committee's final report. We support provisions that would encourage licensing reforms to reduce red tape that slows development of new projects and relicensing of existing projects. Conference negotiations are expected to start after Congress returns in September.

NRECA Supports Efforts on U.S.-Canada Electric Grid Strategy

NRECA and other utility groups filed comments supporting the Energy Department's efforts to develop a U.S.-Canadian Electric Grid Strategy. Large regions of the U.S. and Canada are served by an interconnected grid on both sides of the border, and utilities in each country have many years of experience in coordinating plans, operations and emergency response. Canadian electric utility leaders work with America's electric co-ops and other U.S. utility sector representatives on reliability standards through the North American Electric Reliability Corp. They also work together on the Electricity Subsector Coordinating Council to coordinate efforts to prepare for incidents and threats to our overlapping critical infrastructure.

FERC Extends Comment Period on Transmission Development Incentives

The Federal Energy Regulatory Commission approved a request by NRECA and other utility groups for additional time to comment on issues raised in a [technical conference](#) on competitive transmission development rates. FERC extended the [docket](#) deadline for comments another 30 days to October 3, 2016. The extension, which Delaware and New Jersey utility regulators supported, will help ensure the utility sector has adequate time to address numerous and complex questions in FERC's [notice for comments](#).

No Update Next Week

We're going to break from the routine in sending the Friday "Notes from NRECA" memo next week. Look for another update just before Congress returns in September and then we'll resume the weekly routine.

Attached: RUS LEP Guidance Clarification, Hydropower coalition letter.