

Sponsors: California Municipal Utilities Association; Illinois Municipal Electric Agency; Pennsylvania Municipal Electric Association; Colorado Association of Municipal Utilities, Irrigation and Electrical Districts Association of Arizona; NMPP Energy, Michigan Municipal Electric Association; Tennessee Valley Public Power Association; American Municipal Power; Ohio Municipal Electric Association

In Support of Electric Reliability

1 The American Public Power Association (APPA) strongly supports efforts to maintain and improve the
2 reliability of the nation’s electric grid. Electricity is the lifeblood not only of the individual communities
3 that public power utilities serve, but also of our nation’s economic and national security. Maintaining reli-
4 able service is the number one priority for electric utilities, despite increasing challenges from extreme
5 weather, physical and cyber security threats, changes in generation mix, and increased load due to electri-
6 fication. Public power utilities lead the industry in reliability, usually delivering more reliable electric ser-
7 vice compared with other types of utilities.

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9 Even with a strong record of delivering reliable service, public power utilities know there is more work to
10 be done amid growing threats to electric reliability. In addition to external threats like extreme weather
11 and cyber or physical attacks, public power utilities must also ensure reliability as local, state, and/or fed-
12 eral policies impact the generation mix, causing premature retirements of fossil fuel assets, and impact
13 load growth by promoting the electrification of transportation, industrial processes, and home appliances.
14 APPA believes that federal policymakers should consider electric reliability paramount and should take it
15 into account in making important policy decisions, including major federal regulations.

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17 As part of the Federal Energy Regulatory Commission’s (FERC) mission to protect consumers in obtain-
18 ing reliable, safe, secure, and economically efficient energy services at a reasonable cost, FERC must
19 have both the authority and obligation to analyze the potential reliability impacts of major proposed and
20 final federal regulations, including those proposed by the Environmental Protection Agency. Without
21 such a process in place, federal policymakers could finalize regulations or laws that could significantly
22 harm electric reliability, putting at risk the health, safety, and economic prosperity of all Americans, in-
23 cluding those served by public power.

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25 Additionally, Federal Power Act section 202(c) gives the Secretary of Energy the authority to issue must-
26 run orders to individual power plants during emergencies, including a sudden increase in electricity de-
27 mand or a shortage of electricity. These must-run orders temporarily allow generation facilities to exceed
28 their emissions limitations under environmental regulations.

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30 **NOW, THEREFORE BE IT RESOLVED:** That the American Public Power Association (APPA)
31 strongly supports efforts to maintain and improve the reliability of the nation’s electric grid; and

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33 **BE IT FURTHER RESOLVED:** That APPA believes the Federal Energy Regulatory Commission
34 (FERC) should be given the authority, and has an obligation to, analyze the potential reliability impacts of
35 major proposed and final federal regulations; and

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37 **BE IT FURTHER RESOLVED:** That APPA supports efforts by Congress to enact legislation that
38 would provide FERC with a formal role in determining the potential reliability impacts of major proposed
39 and final federal regulations; and

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41 **BE IT FURTHER RESOLVED:** That APPA believes that should FERC determine a major proposed or
42 final federal regulation would adversely affect the reliable operation of the bulk electric system, it must
43 proactively work with the issuing agency, which should be required to make the necessary modifications
44 to the proposed or final federal regulation to allow electric utilities, including public power utilities, to
45 comply with such regulations without adversely impacting regional or local electric system reliability.