

NOVEMBER-DECEMBER 2024 • VOL. 82 / NO. 6

# PUBLIC POWER MAGAZINE

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The American Public Power Association is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. We advocate before the federal government to protect the interests of the more than 54 million customers that public power utilities serve, and the 96,000 people they employ. Our association offers expertise on electricity policy, technology, trends, training, and operations. We empower members to strengthen their communities by providing superior service, engaging citizens, and instilling pride in community-owned power.

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# A NEW SEASON AND THE IMPACT OF SMALLER PUBLIC POWER COMMUNITIES

BY SCOTT CORWIN, PRESIDENT AND CEO,  
AMERICAN PUBLIC POWER ASSOCIATION

**F**ittingly, the season of thankfulness begins each November when we honor all those who have served our country in the U.S. armed forces.

Our heartfelt thanks go out to all those who served and who continue to serve and protect us.

Of course, November is also election season. With the 2024 elections just passed, we may be thankful just to escape the onslaught of endless political advertisements (at least until the next cycle begins). From a national perspective, every election brings both opportunity and challenge. Well ahead of this season of change and transition, we have been strategizing to make sure APPA, with a powerful broad base of local community connections, is ready to advocate in any political landscape. Our webinar, *How the 2024 Elections Will Impact Public Power*, is a good place to hear more about the new agenda ahead.

We have learned to be nimble and able to adapt for all circumstances, just like our utility members large and small. In this issue, you will read some informative and compelling stories of how utilities in smaller communities are adapting to meet their customers' needs.

In the broader world of electric utilities, where investor-owned utilities serve more than 650,000 customers on average, even a mid-sized public power utility would be considered small. About 82% of APPA members have 20,000 customers or fewer, with 50% having 2,000 or fewer customer accounts. Yet our level of reliability, pride in customer service, and meaningful impact within the community is unmatched nationally.

Part of the reliability and resilience comes from public power systems of all sizes reaching out to help each other. Out of the large storms this fall, APPA will be awarding around 350 mutual aid commendations to member utilities.

The stories in this issue highlight several ways public power communities are leveraging resources to create new capability at home. They are taking on projects like installing new generation and innovative grid technologies, defending against cyber attacks, and addressing threats to community ownership and keep the value of public power flowing to local residents and businesses. Projects, like the one in Kansas where KPP Energy is partnering to help Hillsboro be a generating city for the first time in decades, or in Montezuma, Iowa, where the utility is working with partners to construct the state's first renewable community microgrid, or in Sitka, Alaska, where the community is rehabilitating one of its hydro-electric projects, are all inspiring roadmaps to how utilities create value in small communities.

Like the majority of our members, APPA itself is a relatively small association in Washington; we are by far the smallest of the three major electricity trade associations in terms of staffing and funding. But our strength is in numbers, and in the voices of the 54 million people served in thousands of communities throughout the land. In the coming months, we will continue to ensure your voice is heard by sharing your successes and your challenges with those in the various corridors of power, and by demonstrating to them how federal government actions can help or hinder the success of local communities. Thank you for all you do for your communities and for the mission of public power nationally. 🇺🇸

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# How **SMALL** **COMMUNITIES** Are **Harnessing** **FEDERAL FUNDING** **OPPORTUNITIES**

BY LISA COHN, CONTRIBUTING WRITER

PHOTO BY NIKKI MCKIM, FALLS CITY JOURNAL, NEBRASKA



In the past few years, the Infrastructure Investment and Jobs Act and the Inflation Reduction Act have brought a wave of new and expanded opportunities for public power utilities to leverage federal funding to move projects forward. Even more critical, several programs had funds set aside specifically for smaller entities, nonprofits, and organizations in rural or disadvantaged communities.

Identifying, applying for, and carrying out projects with federal funding can come in many forms. Here's a look at how three municipalities sought and are using grants and other funding to support their electrical systems.

## A Resilience Hub

Montezuma Light & Power obtained \$9.5 million from the Department of Energy to construct a renewable community microgrid — the first in Iowa — that will provide energy resilience and lower the use of diesel.

The project began with a question to Montezuma's superintendent, Kevin Kudart, from Anne Kimber, executive director of the Electric Power Research Center at Iowa State University: Would he be interested in developing a DOE Office of Clean Energy Demonstrations project?

He said 'yes,' and Iowa State, which is managing the project, pulled together the paperwork to apply for grant funding.

The community microgrid project is, in part, a response to a windstorm in August 2020 that took down many transmission and distribution lines, leaving some residents in the region without power for days. But Montezuma Light & Power was up and operating within 1.5 hours, thanks to a diesel-fueled microgrid that allowed the city to be a resilience hub for other communities in the county, said Kimber.

The renewable microgrid project will add 2.5 megawatts of solar and 1.5 megawatt-hours of battery capacity to the existing microgrid to reduce diesel use, lower costs, and cut emissions. The solar array will be located on a 10-acre parcel of city-owned land, and the microgrid will be owned and operated by Montezuma Light & Power, said Zhaoyu Wang, professor at Iowa State's Department of Electrical and Computer Engineering and principal investigator for the project, along with Kimber.

DOE awarded the grant a year after Iowa State applied. To help attract funding, Kudart requested letters of support. He received 40, including from the local barber shop, the schools' superintendent, and a local college. Community members were excited and proud about receiving power from solar, Kimber said.

"I think this project will lead to more interest in microgrids by public power communities in the Midwest, starting with Iowa," she said.

Montezuma Light & Power will provide \$2.5 million in cost sharing funds for the project. The utility has that money in reserve, Kudart said.

The solar-charged batteries in the microgrid will replace some of the power the utility purchases from the Midcontinent Independent System Operator market, said Kudart. When MISO prices are high, the battery can provide power to avoid the high prices, which generally run \$100 to \$200 per megawatt, he said.

The microgrid will operate during peak hours, generally from 1 to 5 pm, supplying power to 1,500 residents.

It's estimated that peak shaving and reduced market purchases will cut costs by about \$200,000 a year, said Wang.

Wang said project participants have grappled with three challenges in planning for the microgrid. First, they needed to justify the investment. Second, a time-consuming environmental assessment was required. Third, inflation increased the costs of the microgrid and extended the lead time to acquire switchgears.



The proposed Mid-America Rail Campus. Image courtesy Falls City EDGE.

**“The construction itself is not the biggest issue; it’s the money and design and communication with the local community that’s most important.”**

**ZHAYOU WANG**, PROFESSOR, ELECTRICAL AND COMPUTER ENGINEERING  
IOWA STATE UNIVERSITY

## Supporting Continuity

In Sitka, Alaska, attracting grant funding has a different focus. The city was recently awarded \$2.5 million from DOE to maintain and upgrade one of the city’s two hydroelectric dams. Bri Gabel, sustainability coordinator for Sitka’s Planning and Community Development Department, said the aim is not to build new infrastructure, but to rehabilitate two hydropower turbines at the Green Lake Hydroelectric Project.

Sitka is an islanded microgrid and must generate all its own power. The Green Lake plant provides 30% to 40% of Sitka’s energy needs, and the rest of the city’s demand is met by the Blue Lake Hydroelectric Project. The city has diesel generators for emergency backup.

Both the Green Lake and Blue Lake plants have been operating for many years — Blue Lake since 1960 and Green Lake since 1982 — and the city wanted to ensure it could continue providing 99.9% clean power to the community, especially at a time when load is increasing because of electrification, Gabel said.

The application process began after Sitka’s mayor, administrator, and public and government relations director met with officials in DOE’s



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**“There’s probably nothing more important that I can do day-to-day than just make sure that our community is aware of what we’re doing, the businesses we’re trying to go after, and the prosperity we’re trying to create for the next generation.”**

**LUCAS FROESCHL**, EXECUTIVE DIRECTOR  
FALLS CITY EDGE, NEBRASKA

Water Power Technologies Office and returned with a brochure about funding opportunities.

“After researching them for applicability to Sitka’s critical projects, I made the recommendation to apply for a Section 247 incentive for the Green Lake rehabilitation. I started planning the application about seven months in advance of the deadline and started consolidating necessary documents between city departments,” Gabel said. About a dozen city staff members contributed to the application.

The project includes three phases. The turbine assessment phase has been completed. Gabel hopes the town can do the final two turbine refurbishment phases simultaneously to cut costs, but more upfront funding would be needed for that. The timing depends in part on the availability of contractors to do the work, Gabel said.

## Stacking Benefits

For Falls City Utilities in Nebraska, funding is for a long-term economic development project that would require additional electrical capacity.

Falls City received a \$15 million grant from the Nebraska Legislature to shore up the city’s electric infrastructure, and Falls City Economic Development and Growth Enterprise, or EDGE, a nonprofit public-private consortium, landed a \$50,000 Communities Local Energy Action Program, or LEAP, grant from DOE. This will help Falls City EDGE study the feasibility of attracting new businesses with a solar microgrid or secondary transmission line that would serve a proposed industrial park.

A solar microgrid could attract new industries to the park, said Lucas Froeschl, executive director at Falls City EDGE.

The project is in Richardson County, Nebraska, which has been identified as a disadvantaged community by the federal government. The

government also designated the area as “energy burdened” because only one transmission line feeds the city and it doesn’t have extra capacity.

The city now has a load of about 14 MW but doesn’t have access to additional power to help its community grow, Froeschl said. The city owns contracts for generation from a coal-fired plant, has a hydroelectric allocation, and meets its other supply needs by purchasing on the open market with assistance from the Municipal Energy Agency of Nebraska.

EDGE identified a business willing to locate in Falls City and buy power so the city could afford to install additional infrastructure. But the business didn’t want to locate in the area until the needed infrastructure was installed.

“So we’ve got the chicken or egg paradox going on,” Froeschl said.

In spring 2022, the city secured the \$15 million grant from the Nebraska Legislature to help expand the electrical infrastructure.

Meanwhile, Falls City EDGE looked at acquiring property where it could possibly take advantage of local corn and soybean feedstocks to create a biofuels industry at the proposed Mid-America Rail Campus. The city received a \$50,000 LEAP grant, which will pay for an engineer’s cost of opinion of that secondary transmission line. It also provides 18 months of technical assistance from experts at the National Renewable Energy Laboratory to draft a cost-benefit analysis on developing a solar-plus-storage microgrid to generate its own power. With that study, Froeschl hopes to pursue another round of federal funding focused on battery pilot programs or microgrids.

“We think that the timing is right to try to go after some of these projects,” he said.

In addition, Falls City EDGE has been awarded a \$70,000 grant through the U.S. Department of Agriculture to pursue a Bioeconomy Development Opportunity Zone study. It was matched with \$75,000

of in-kind work from Falls City EDGE and Ecostrat, which focuses on increasing the development of biofuels.

Right now, the single transmission line is curtailed multiple times a year, and the city fires up a power plant fueled by diesel and natural gas.

“So, effectively, we do kind of have a microgrid system going on through our power plant,” Froeschl said. The dual-fuel engine is started by diesel and then run by natural gas. It can power the whole town when needed, but it’s not cost-effective. “That power plant functions as our insurance policy,” he said.

A solar microgrid could offset demand during peak hours, provide resilience during power outages, and provide clean energy to the Mid-America Rail Campus.

Adding solar also could help the city attract businesses interested in using clean energy and potentially take advantage of tax credits for clean energy production.

Initially, the microgrid would provide peak shaving and resilience.

The hope is that the microgrid could provide some of the 50 MW of generation needed for the biofuels project and help attract emerging biofuels companies. The Mid-America Rail Campus could create prosperity for people within a 25- to 50-mile region, he said.

## Connecting to Community Goals

An important aim for both the Falls City and Montezuma Light & Power projects is to educate residents.

“There’s probably nothing more important that I can do day-to-day than just make sure that our community is aware of what we’re doing, the businesses we’re trying to go after, and the prosperity we’re trying to create for the next generation. In my quarterly reports to city and county officials, we are asking all to keep an open mind to what we’re trying to do,” Froeschl said.

“The construction itself is not the biggest issue; it’s the money and design and communication with the local community that’s most important,” Wang agreed.

Of course, applying for grants and incentives is critical to achieving city goals, said Kudart. “We couldn’t pull this off without the grant, no way,” he said. “It wouldn’t be economically feasible.”



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The Green Lake Hydro Project. Photo by Lee House.

**“Sitka as a community really values the hydroelectric infrastructure that their parents and grandparents have invested in, and it’s something that they want to utilize. So, our job is making sure that it keeps running.”**

**BRI GABEL**, SUSTAINABILITY COORDINATOR,  
DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT,  
SITKA, ALASKA

In Sitka, finding funding for the Green Lake project has been a challenge. The city, which is on an island in southeast Alaska, is isolated and can’t sell excess power to generate extra money.

“That’s why the DOE money is potentially so impactful,” Gabel said. The grant pays for a third of the cost of the work and shortens the project timeline. The rest of the funds will come from a portion of the town budget that Sitka has been building up for nearly a decade.

“Sitka as a community really values the hydroelectric infrastructure that their parents and grandparents have invested in, and it’s something that they want to utilize. So, our job is making sure that it keeps running,” Gabel said.

Smaller public power utilities might feel daunted by trying to keep up with the many grants and incentives available for upgrading or building new infrastructure. While it may, at times, be challenging to identify and apply for grants, the utility representatives said it’s worth the effort.

It’s important to weed through the options and choose the opportunities that play to a utility’s strengths, said Gabel.

“It’s a matter of filtering out the highly applicable opportunities from the not so applicable,” she said. “We looked at opportunities meant to enhance or reward us for our clean energy production.”

“It doesn’t hurt to do the application,” said Kudart. “If the opportunity is there, go for it.” 🇺🇸



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# CYBERSECURITY WAKE-UP CALL

## LESSONS FROM AN ATTACK ON A SMALL UTILITY

**N**ick Lawler was sitting in his office on a Friday afternoon the week before Thanksgiving 2023 when he got a call that sounded like a scam: The caller said he was from the FBI, and the Littleton Electric Light and Water Department was identified as one of about 200 critical infrastructure entities that were victims of cyber espionage. Further, the caller was asking Lawler to click on a link sent to his personal email address.

Doing his due diligence, Lawler took down the name of the agent and called the local field office directly. Even after that conversation, Lawler still wasn't convinced the situation was real. When Monday morning rolled around, several federal agents — from the FBI and the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency — showed up to his office to start investigating the extent of the breach.



Other than the out-of-the-blue nature of the alert, Lawler's skepticism stemmed from LELWD being a utility that served a small town in Massachusetts that doesn't operate any generating assets and isn't part of the bulk electric system. He didn't understand why such a utility would be a priority for the federal government, or why it would offer services and resources to the utility for no cost.

Fortunately, LELWD had been in the process of installing sensors on its operational technology through a cooperative agreement between the American Public Power Association and the Department of Energy. Lawler said the sensors had been in place for about a month or two before he got the call about the attack. Lawler's first call after the agents left was to Adrienne Lotto, APPA's senior vice president of grid security, to assess the significance of the situation. The sensors helped LELWD confirm the



extent of the malicious activity on the system and pinpoint when and where the attackers were going on the utility's networks.

"That's when it became real for us," noted Lawler.

He said the partnership with the federal officials truly began after seeing the activity logs and having the reality of the situation set in.

Still, getting the partnership in motion didn't offer immediate peace of mind. DHS officials wanted to continue to monitor the criminal behavior to get more insight into the strategy and tactics being deployed, which left LELWD's networks vulnerable for about another month.

Some of the key vulnerabilities for LELWD at the time included a patch for a firewall that a managed security provider had not completed, a flat network structure that allowed those with administrative credentials to access the entire network, and not regularly updating passwords for key systems.

Littleton rebuilt its network from scratch, with help from experts at CISA, to have key aspects isolated from each other.

"As a small utility, we don't have that type of staff to build that network," said Lawler. "Everyone we dealt with from DHS and CISA were extremely well versed in the field."

Now a year later, Lawler gets some reassurance from the updated network architecture, security measures, and continuous monitoring that the event has not resulted in any negative consequences for the utility or the community it serves. But, he said the incident also underscored that there are always actions utility leaders can take to stay on top of threats. LELWD worked again with CISA to have it conduct a penetration test and vulnerability scan, which are free services the agency offers to utilities. He said such types of assessments can help utilities understand what systems and processes need to be shaped out or improved — or even have an idea of where to start and understand where the threats are.

"It is hard to talk about... our issues and vulnerabilities," said Lawler. "But if we don't, then we aren't learning from each other."

Lawler also advises utility leaders to form relationships with key players who can help, such as representatives from a regional FBI office, before an incident occurs, so they don't have an experience similar to his.

"We were able to verify them within the week, but if those relationships had already existed, we would have been able to react even quicker," he added.

Despite the array of free services offered through various federal agencies, Lawler noted the importance of allocating resources to cybersecurity. He advises utilities to start by setting aside funding to do a vulnerability assessment, which he said will help to develop the appropriate budget to target the most critical areas.

"Until you know what your risks are, it's hard to do anything." 🇺🇸

# 10 WAYS TO BE MORE CYBERSECURE

- Maintain an asset inventory
- Segment IT and OT networks
- Regularly change passwords, including default passwords on key accounts
- Implement a vulnerability management plan
- Employ multi-factor authentication for remote access
- Regularly train all employees on cybersecurity
- Sign up to receive alerts from E-ISAC
- Build relationships with state, regional, and national law enforcement
- Sign up for cyber mutual assistance
- Join APPA's Cybersecurity Defense Community

**Through the Cyber Pathways Program, APPA members can receive cybersecurity training for their staff. Email [Cybersecurity@PublicPower.org](mailto:Cybersecurity@PublicPower.org) for more information.**

# Public Power Leaders: Gary Jones



**G**ary Jones has served as city manager for the city of Altus, Oklahoma, since 2019. The city has owned its electric utility since 1929 and currently has about 9,000 electric customers. Jones previously served as Oklahoma's State Auditor and Inspector for eight years, and a four-year term as a Comanche County Commissioner. He was elected five times as Chairman of the Oklahoma Republican Party. When he was a county commissioner, he received the Superior Achievement Award from the Oklahoma Good Roads and Streets Association. In 2016, Jones received the Sunshine Award, which recognizes a public official that has shown a commitment to freedom of information. He is a graduate of Cameron University, where he earned his degree in business administration with a minor in accounting. He became a Certified Public Accountant in 2000. He also currently serves on the Board of Directors for the Oklahoma Municipal Power Authority.

## HOW DID YOU COME TO WORK IN PUBLIC POWER?

Before this job, I was a state auditor for eight years, a position which was term limited. When I retired, I would go check the cows and feed them, and then, when I'd go back inside, my options were to watch TV or get on the internet. I was told that, at my house, we weren't going to do that. I felt that I had to go back to work, and the opportunity came up for this position.

When they interviewed me, one of the interviewers remarked that I didn't have "any municipal experience," but my response was that I've got all kinds of municipal experience. I've audited so many cities, I can tell you what not to do. I could see how people were able to do innovative things, and I had the benefit of seeing what was done right by some people and what was done wrong in putting together plans.

When I was county commissioner, one thing I liked was that if you could identify a problem together, then you could find a solution and go do that. As a city manager, you can do the same. The previous city manager negotiated a resignation on a 5-4 vote, and two weeks later, they hired me on a 5-4 vote. And since then, all votes have been 9-0. So, we've worked together and got a lot of things done.

## HOW DO ACCOUNTABILITY AND COMMUNITY OWNERSHIP OVERLAP?

I'm the city manager, which means if something's wrong, it's my fault. But it's also up to me to find a way to fix it.

We're constantly looking for better ways of doing things. We want to make sure that we're billing people properly and that we're making good use of their funds. A lot of small communities are always looking for grants because they see they have a problem and don't have the revenue. One thing we've been innovative about is looking at how we can bring all the different resources together and finding ways through other income sources to make it all happen.

We are the smallest community in the U.S. supporting a major military installation. We're always looking at how we can work together. With military bases, the big issue is resiliency — being able to continue operations if there's a storm or something else that might interfere with their ability to perform their mission. For us, the main threats are ice storms and tornadoes. If we lose our transmission lines, we lose our electricity. Ninety percent of the people who live on base actually work in Altus. We're looking at putting in some generation here to make sure that, if we lose our electrical transmission, the essential services in the community are still up and going.

## WHAT ACHIEVEMENTS ARE YOU PROUD OF THAT YOUR LEADERSHIP HAS DONE FOR THE CITY?

Housing is an issue across the country, but especially in military communities. We had a good job at the base that couldn't be filled because there was no place for the person to live. We did a housing study and found we were about 550-600 houses short. We went to the builders and asked what it would take to build the type of housing that's needed. They said they can't take the risk to spend millions of dollars to put the infrastructure in. We found funding so that we could put in water, sewer, electrical... so they basically had lots that were shovel ready.

We're going to hit our goal in about five years. Some of the land where new developments are going in was purchased with the help of the military, and plans had been designed in 2000, but they couldn't figure out how to move forward. In fact, as we do this housing addition, we're looking to expand our 9-hole golf course into an 18-hole golf course. And as we're doing this, someone found a plan — from 1959 — to add those extra nine holes. We're in the process of making that happen now.

## WHAT PRIORITIES DOES THE CITY HAVE RIGHT NOW IN PLANNING FOR ITS FUTURE?

My goal is to address about 50 years' worth of deferred maintenance and to put us on firm financial ground. We have water and sewer lines that need to be repaired. We just got through redoing our water towers, which hadn't been redone for probably 40 years.

In Oklahoma, we have limited revenues because we don't have income tax. If we didn't have the electric company, we would be relying primarily on sales tax, and that's limited. If we run efficiently and are able to generate additional revenues, then we can use those for not just fixing the electrical, but also the sewer, water, and other systems. We put together a plan to restructure our sales tax, because we had gotten so dependent on electric rates that we had some of the highest in the region. We haven't had an increase in our electric rates since I've been here; we've reduced them by 6%.

I would love to have enough generation to power the city on locally generated power. We have plans to put some generation on a 160-acre industrial park next to the air base. The first step is to get the initial thing done and putting a plan together to make it happen.


The goal is not just leaving it better than we found it, but leaving the administration within the city the ability to continue to move forward. We want to figure out how to get the hardest part of it done so they don't hit roadblocks down the line.

## WHAT MAKES FOR A SUCCESSFUL LEADER FOR A PUBLIC POWER UTILITY?

The big thing is to be able to understand what your strengths are and utilize the people that have strengths in another area. I can't tell you exactly how our electric system works. I have people that do, and I listen to them.

It's important to keep your governing body informed so they understand what you're trying to accomplish. They can be good partners when everybody's moving in the same direction, but if you don't keep them informed, then that's more difficult to do.

One thing that was useful was really understanding our strengths as a community. You'll have people say we need to be a high-tech community... but if you don't have the attributes or characteristics to support that, it won't happen. Our big things are military, agriculture, and sports. We're building a world-class trap and skeet shooting facility, and it's something the community is really into.

I've had the opportunity to go to some bigger communities that make more money, but it's a lot more rewarding to work with a community with shared values and a shared vision, as opposed to chasing the dollars. As we work together to accomplish the vision... it's very rewarding. 

# WHERE PUBLIC POWER GETS ITS POWER

In 2022, public power generated 353,210,052 megawatt-hours of electricity. This represents about **9%** of all electricity generated in the U.S., but...

**Only 28% of public power utilities own any generating capacity**



**64% of public power utilities belong to a joint action agency, from which they often purchase power at wholesale**



Joint action agencies owned 22,481 megawatts of generating capacity on behalf of their members in 2022, or, about **18%** of public power's total owned capacity.

## Sources of Public Power Generating Capacity

Public power **owned 122,365 megawatts** of generating capacity, or 10% of nameplate capacity in the U.S., in 2022.

Public power **contracted for 30,416 MW** of power in 2023.

In 2022, the federal **power marketing administrations** allocated more than **13,000 MW** of clean energy capacity to public power.

Public power utilities also purchase power from the **Tennessee Valley Authority**, which owns **34,000 MW** of capacity.

Lastly, public power utilities also purchase power from the wholesale markets and from other utilities to fulfill their supply needs. The aggregate data on how much supply is encompassed in these purchases is not available.

## A Patchwork of Clean Energy

While approximately **40% of public power-owned utility generation was from clean energy sources in 2023**, that doesn't include:

- Over **70,500,000 MWh** of clean energy the federal power marketing administrations sold to public power.\*
- Over **47,000 MWh** of clean energy from TVA sold to public power utilities.
- The output from the more than **23,000 MW** of wind, solar, hydro, and other renewable capacity public power secured through power purchase agreements (usually with non-utility generators) in 2023.



# How Small Utilities with Grid Technology

BY BETSY LOEFF, CONTRIBUTING WRITER

**E**lectric utilities are building systems that allow for an increasingly resilient grid, and cost needn't leave any utility behind. Between the cost of various energy-related technologies coming down and a suite of federal funding opportunities, public power utilities serving smaller communities are exploring and deploying an array of technologies and system upgrades — without depleting community resources.

## Making Space for More Solar

While far outside of the Sun Belt, Massachusetts ranks among the states

producing the highest amounts of small-scale solar generation. In 2022, more than 3,400 gigawatt-hours of electricity were generated from small-scale solar, primarily residential rooftop panels. According to the Electricity Information Administration, small-scale systems accounted for more than three-fifths of the state's total solar capacity in 2022. Despite these numbers, residents continue to look to solar to fill the void that will be left by the more than 1.4 gigawatts of natural gas capacity planned to be retired in the state this year.

“We have quite a lot of solar, and the community wants even more. If we're



# Are Keeping Up gy

going to keep adding solar power, we need a battery to store some of that excess electricity,” said Jason Bulger, director of Concord Municipal Light Plant. The community is taking advantage of the elective payment mechanism, also known as direct payment, enacted as part of the Inflation Reduction Act, to help pay for several storage projects.

The elective payment mechanism is a way for nonprofit organizations, which do not file taxes, to directly benefit from the tax credits expanded in the 2022 law to stimulate economic and clean energy development. Prior to its enactment,

nonprofit utilities including public power and cooperatives were effectively excluded from the production tax credit and investment tax credit for wind and solar.

Projects breaking ground after 2023 must meet domestic content requirements to qualify for elective payment. The effect of failing to meet this requirement phases in over time, but Bulger added that CMLP will get a 25.5% credit on a 2-megawatt, 4-megawatt-hour solar-plus-storage battery installation at a local school because that project broke ground in 2024.



Photo courtesy Concord Municipal Light Plant

**“We’ll need to buy our own battery because we need a level of control that differs from how these cost-saving models work.”**

**JASON BULGER**, DIRECTOR,  
CONCORD MUNICIPAL LIGHT PLANT, MASSACHUSETTS

CMLP will be using the elective payment mechanism for multiple initiatives. Because the provision has complex requirements, the public power utility hired a consultant to study its situation and lay out the criteria to be met. For instance, there are domestic content requirements, Bulger said, which require using only U.S.-made structural steel and iron for a project, but allow up to 60% of equipment components to be manufactured outside the U.S.

Bulger said a larger storage project — a 5-MW, 15-MWh battery — probably won’t break ground until 2025. CMLP planned this second project to ensure that the community can continue absorbing solar production even if it exceeds demand. “We’ve seen other communities that have had to start saying no to new solar applications for rooftop solar because they are getting saturation issues,” Bulger said.

Without the battery, CMLP may reach a point where rooftop solar exceeds demand, and distribution system protective devices could kick in

and start cutting power to customers on some transformers. The town may also be forced to deny additional solar permits.

Still, directly owning battery storage isn’t the only solution CMLP managers have considered. At an April town meeting, residents asked the town to explore other options, so it did.

“We’ve had a lot of meetings with companies that do cost-saving models,” Bulger said. “You don’t have to put out upfront capital for a battery, and they split the proceeds of your transmission cost reductions, so you’re saving money as an entity. You’re also incurring very low risk because you don’t have to put in your own capital to buy the battery.”

Despite the attractiveness of these models, Bulger said his community is expecting to purchase its storage solution because CMLP has a primary need for the device: absorbing excess solar power. “These companies come in and say, ‘We’re putting in the battery, and we’re going to use it for peak shaving and transmission cost avoidance. We’ll charge it when we want,’”

he explained. “We assume we’ll need to buy our own battery because we need a level of control that differs from how these cost-saving models work.”

### Faster Finding and Fixing

Hurricane Helene’s windy, rainy edge wasn’t the first storm to knock out power for some customers in Gaffney, South Carolina, and it won’t be the last. That’s why the county’s Board of Public Works is welcoming a \$417,605 grant funded by the U.S. Department of Energy to help the public power utility shore up reliability for its 8,000 electricity customers in the town of Gaffney and beyond.

Gaffney and 17 other communities in the state received funding from the Grid Resilience Grant Program. Santee Cooper administered the \$10.8 million from the DOE, which primarily targets improvements in disadvantaged areas of the Palmetto State.

The project will pay for equipment to support fault location, isolation and service restoration, a.k.a. FLISR. Specifically, the board is installing automated switches on its already robust network. “We have our own fiber loop that incorporates our entire electrical system,” said Brad Wright, electrical superintendent for BPW. “Every site—four substations, 14 circuits—everything is connected via a direct BPW network and ties back into the central location here at the office in Gaffney.”

The BPW is taking a phased-in approach to FLISR. It starts with implementing the new communication-enabled switches to facilitate remote switching via the utility SCADA system. “If a large oak tree falls and takes out a circuit, and if you have multiple switches throughout the system, you can isolate that trouble area and get 90% of your customers back up quickly,” Wright explained.

Once these switches are installed, they will be controllable via the SCADA system and deliver the fault isolation part of FLISR. BPW also has an outage management system in place that gets outage notifications from its advanced metering system, so that supports fault location. Next,

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A solar array similar to the one proposed for Hillsboro. Photo by Priority Power.

**“These solar projects come at a crucial time for us because we’ll be able to add that capacity and take advantage of these loan and tax credit programs.”**

**MATT STILES**, CITY ADMINISTRATOR,  
**HILLSBORO, KANSAS**

BPW intends to implement an advanced distribution management system, or ADMS. “You have to get the hardware installed before you get to software,” Wright added. The ADMS will automate switching, so the finished system will be able to detect, locate, and isolate faults independently.

In looking at that software, he will be seeking a system that can be managed by operational employees, not information systems experts. “When you start getting into the smaller municipal world, you have to be careful,” Wright said. “Do I have a 40-hour-a-week employee that will need to manage this? Or is this manageable with our current staff?”

He added that workers on the electrical side must be able to use the system without a lot of support from the IT team because those electrical workers are the ones tasked with restoring the outages. “You look at a lot of software, and it’s not really self-managing. It requires someone to be sitting in front of that computer 24 hours a day. We’re looking for low-maintenance, self-sustaining systems,” Wright said.

Regardless of the department managing the technology, Wright added that it’s actually a customer-service enhancement. “BPW has been providing electric, water, and wastewater service to Gaffney and surrounding areas since 1907,” he said, adding that along with the lowest rates in the state, the public power utility also maintains better reliability than nearby utilities. “This is due to a comprehensive preventative maintenance program and year-round right-of-way maintenance. All these new technologies will help us continue providing a reliable distribution system for our customers and the best customer service we possibly can.”

## Generating Again

“We used to be a generating city back in the ‘60s and ‘70s,” said Matt Stiles, city administrator for Hillsboro, Kansas, a town with an electric department that supplies power to the 3,000 people who live there. “We

had diesel generators but decommissioned them before we joined KPP Energy. Now, we're going to be a generating city once again."

KPP Energy is a wholesale power agency serving two dozen member cities, including Hillsboro, and the agency recently secured a \$35 million partially forgivable loan from the U.S. Department of Agriculture's Powering Affordable Clean Energy, or PACE, program. Those dollars will help KPP build nine generating facilities to produce 18.5 MW of renewable energy across rural Kansas. Along with being able to get 25% of the loan forgiven, KPP will be able to take advantage of elective payment, like CMLP.

Among the solar projects ahead is a 1-MW solar farm in Hillsboro that will be placed on city property near a substation owned by Evergy, a nearby investor-owned utility that feeds power into the town.

The project is coming at an opportune time, as the Southwest Power Pool, the regional transmission operator for the area, recently changed its capacity requirements, and KPP was coming up short.

"KPP would have to add some capacity somewhere. We'd either have to buy it from somebody else or build some," Stiles said. "These solar projects

come at a crucial time for us because we'll be able to add that capacity and take advantage of these loan and tax credit programs."

Solar is a good fit, too, he added. "We don't have any in the KPP portfolio now. We have wind energy, but we have so much sunlight where we're placing these things, solar makes sense," Stiles said.

The installation is rated to last 30 years, it will be low-maintenance, and the panels track the sun, so they'll generate during the area's summer peak hours. "That's one of the advantages of solar," Stiles noted. "We found that it follows our load trajectory, whereas our wind energy isn't as reliable. We'll still need to purchase some load-following generation, but it will help with peaking."

Hillsboro will get leasing income from the solar facility, which will be situated on unused land with little commercial potential. That, along with the federal support KPP secured, means the new solar power will be cost-effective. Stiles said the project will help KPP and the city stabilize rates and avoid increases for the time being. 🇺🇸

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# Protecting Public Power *Keeping Your Community on Your Side*

**BY SUSAN PARTAIN**, DIRECTOR, CONTENT STRATEGY,  
AMERICAN PUBLIC POWER ASSOCIATION



Power Plant and Substation 3 in Gardner, Kansas. Photos courtesy Gardner Energy.



**C**hange of ownership of an electric utility is rare, but does happen. In the last 25 years, more than 30 public power utilities have been sold, and even more communities have faced the question of whether to sell the utility. While the utilities that have been sold have served communities of all sizes, most of the utilities sold were smaller — with some only serving a few hundred customers.

While the American Public Power Association doesn't have an official count of how many utilities have faced a threat to their community ownership, staff regularly hear from members facing emerging or potential threats — whether in the form of an actual sale proposal or grumbling from a community group or elected official.

In recent cases where the community rallied to maintain ownership, each community was able to show that the cost of losing a public power utility would be far greater than the potential “fast cash” gained from a sale. Years after the threat experience, these utilities shared how they continue to showcase the value of public power and stay connected to the community.




## Spreading the Message

Princeton, Minnesota, a town of over 5,000 people about 50 miles north of Minneapolis, has operated its utility commission since 1911. But in 2018, a mayor was elected on a platform that included dismantling the commission. While Keith Butcher, general manager for Princeton Public Utilities Commission, doesn't believe there was ever a firm offer to buy the utility, he thought a sellout was the ultimate aim of the mayor, so that the city would then have funds to pay for other projects.

Butcher was hired in 2019, in the middle of the tense political situation for the utility. He saw that there had been very little employee turnover at the utility, which meant he had a team that was comfortable with all the various systems and had deep historical knowledge on various aspects of utility operations. However, he also saw how that stasis translated to very little updating in the technology or processes used, and not much communication with customers.

“The mayor took advantage of a vacuum where the utility hadn't been communicating effectively,” he said. “I have always told people that if you don't tell your story, someone else will.”



**“It’s really easy when you are at a small utility to think you are alone. It’s important people understand that we have a shared experience.”**

**KEITH BUTCHER**, GENERAL MANAGER,  
**PRINCETON PUBLIC UTILITIES COMMISSION,**  
MINNESOTA

Despite the near-term threat, Butcher took a long-term view in strategizing how to improve community outreach. He heard from the various ‘critics’ of the utility, found the local champions for community ownership, and learned who didn’t seem to know much about the utility one way or another. Butcher said the utility made efforts to promote more transparency, including by setting up a YouTube channel for commission meeting recordings, posting more often on Facebook, and becoming more involved with community groups. Princeton Public Utilities expanded its public education efforts by creating a series of virtual tours during the COVID-19 pandemic. The video series included interviews with current and former staff and commissioners. The flow of information helped assuage the critics and raise awareness of the local, accountable facets of public power.

Butcher noticed that older residents were supportive of the public power utility, but that younger residents were not aware that the utility was nonprofit and locally run. He saw the utility’s messages getting shared on community boards and via word of mouth but found it difficult to find a way to reach the younger generation.

“It’s easy for all of us to get in our bubbles and think that everyone is going to our website or knows what we’re doing because [we have] public meetings,” explained Butcher. He stressed that utility leaders should be thinking about how to reach out to all demographics in the community,

from the young adults who are paying their first utility bill to the older adults on Social Security income. “It’s a struggle ... I know how I consume news, but, sometimes I ask my wife or my sons... ‘If I wanted to get something out to you and your friends, how would I do that?’”

The question of dissolving the commission was put up as a ballot measure in 2020.

Butcher credited a citizen, Lee Steinbrecher, with taking the lead in supporting a robust grassroots effort to keep the commission. For his commitment to public power and lifetime of service to the Princeton community, Lee won the Minnesota Municipal Utilities Association’s 2024 Community Service Award, which was bestowed soon before he passed away in August.

In that election, residents voted overwhelmingly in favor of keeping the commission — and elected a new mayor. Butcher said there hasn’t been talk of a sale since, and the relationship between the utilities commission and the city council has mended.

“What we went through was purely political,” said Butcher. “The concerns raised were based on personal perceptions and feelings, so we shared facts — about what we offer and what it would mean to be under a different structure. If it had started with a more data-driven purpose, it wouldn’t have gotten as far.”

Still, the reason Princeton has a separate commission in the first place is a credit to its founders, who, Butcher said, recognized the need for the

utility to make decisions about what is good for the community over the long term, not just through the next election.

Looking ahead, he credits the field and office staff with helping to share utility messages and answer customer questions while out in public. “All of those little interactions matter. We tend to focus on price and reliability, but we must remember that customers are comparing our services with others.”

He advised utilities to keep an eye on what kind of programs their neighboring utilities offer, whether that’s the ability to pay online, choose between rate structures, see their real-time data, or sign up for outage text notifications with estimated recovery times.

“It’s really easy when you are at a small utility to think you are alone. It’s important people understand that we have a shared experience,” said Butcher. He encouraged utility leaders to reach out to their peers, whether through shared membership in a state or regional association, joint action agency, or via APPA.

## Value to Neighbors

In 2016, Mount Pleasant City Power in Utah received a buyout offer from investor-owned utility Rocky Mountain Power.


Shane Ward, power superintendent at Mount Pleasant, said that the offer stemmed from the city’s then-mayor not understanding the value of public power to Mt. Pleasant residents and the greater area. Ward said that the mayor at the time had been looking for a quick way to get the city out of debt following the development of a water treatment plant. Prior to the offer, he said the mayor had been meeting with representatives from the IOU outside of council meetings and unbeknown to the utility. The mayor had been asking Ward for details about some of the utility’s assets that were then used to inform the IOU’s offer, which was for \$8 million.

“I didn’t know it at the time, but I was giving information to Rocky Mountain on the number of poles, wires, etc. ... That’s how they came up with that figure,” he said.

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**“The biggest thing you can do as a utility is let your customers see you ... Let them see that you are doing your job.”**

**SHANE WARD, POWER SUPERINTENDENT,  
MOUNT PLEASANT CITY POWER, UTAH**

The secretive nature of the data requests led to an incomplete picture of the utility’s assets and completely excluded other aspects of the value of community ownership. Ward said that a lot of infrastructure was not included in the IOU’s evaluation, including all of the system serving a gated community in a mountainous area of the territory. A utility-backed valuation put the utility’s worth at \$33 million.

Mount Pleasant residents rallied to shut down the sale.

“The citizens realized we did a lot more,” added Ward. “For instance, we’re working on our lights right now, and that would have had to be contracted out. We’re doing a lot of work for the community... I don’t know how you put a cost on that.”

Still, the incident spurred on the utility to increase its public outreach efforts.

“After this whole situation happened, we branded ourselves,” said Ward. Branding activities included creating a logo, strategic plan, and a capital facilities plan. “It’s important that you know your worth... have a strategic plan, a mission, and a vision. You aren’t going to meet all those goals, but you are doing the best you can.”

In the eight years since, Ward said the utility has made a point to be involved in activities for and with the community, including everything from safety presentations to taking part in a Fourth of July rodeo. The utility also has grown its relationship with a resort subdivision outside of the city limits that has a lot of seasonal residents. This outreach, said Ward,

has helped bridge a divide that had previously been felt between that community and city residents, and helped raise awareness about public power.

“The biggest thing you can do as a utility is let your customers see you ... Let them see that you are doing your job,” he said, noting how residents often mention in council meetings that they see “the power guys out working all the time.” With two other public power utilities nearby, this visibility extends beyond the city limits and into those communities when there is a bigger project that requires additional help.

The utility also has focused on improving and maintaining communication with city leadership.

“Mayors, council members come and go, they don’t stick around like your employees do. Communication is key.”

Ward and other utility leaders have a monthly sit-down with council members to go over what projects are going on, including any concerns about project progress or from employees, so that the council is well aware of what is going on within the department. Between these monthly meetings, council members receive a weekly run down of highlights and activities in the department.

One area of focus is in diversifying the power supply to reduce the risk from market volatility.

Ward also stressed the importance of making sure your employees feel valued. Mount Pleasant has been involved in a multi-year effort to help

crew members progress in their careers and in keeping pay up to par for the region.

Part of the value is tapping into the difference between working for a corporation versus a community entity. He reflected how the working environment at the time of the proposed sale didn't include a lot of trust. For example, there had been a proposal to put cameras in utility trucks, which was not well received.

Ward recalled how a colleague who left to work for an IOU lamented how "your freedoms being in public power are amazing compared to what [it's like working at] an IOU. They have to meet their quota. The biggest thing for public power is that we provide a service for our customers."

## Staying Reliable

In Kansas, private companies had been looking at acquiring some smaller utilities in the early 2000s. Gardner Energy, which is the public power

utility that serves the growing community to the southwest of the Kansas City metropolitan area, was one of the utilities targeted to be bought.

Gonzalo Garcia, utilities director at Gardner Energy, said that the city council was a little concerned about the city's finances after a particularly hot summer in 2005, when it needed to buy excess energy at a premium price. Garcia didn't see evidence that the utility was in any financial trouble but noted that the reduced revenue could have been a trigger for even considering a sale.

His predecessor focused on educating the council about the benefits of owning the utility, which meant "we can control our rates, our system is a lot more efficient, and our response time is very quick — usually under 10 minutes during regular working hours."

Instead of selling, the city council voted in 2008 to retain the utility and form an electric utility board to run it as more of an independent business unit from the city. The move was part of a host of changes geared toward bringing additional revenues and services to the city. The council at the time of the vote saw the value the utility brought to the community

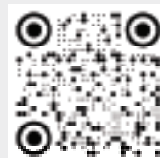


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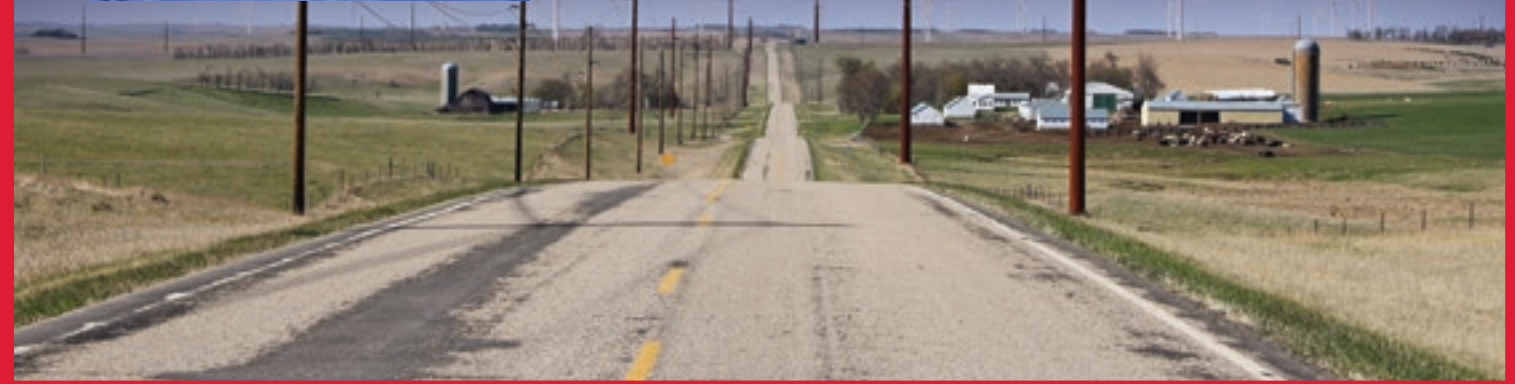
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**“We can control our rates, our system is a lot more efficient, and our response time is very quick.”**

**GONZALO GARCIA**, UTILITIES DIRECTOR,  
**GARDNER ENERGY, KANSAS**



through its reliability, rates, and response times.

The new structure and utility leadership focused on undergrounding a large portion of the system, started a new tree trimming program, and developed a standard for electric infrastructure and fees for interconnecting to the system. The latter helped bolster revenue, and the former led to a system that is now about 70% underground, Garcia said.

In 2014, the council voted again, this time to combine management of the city’s water, wastewater, and electric services under one department. That move dissolved the electric utility board and formed a utility advisory committee, which provides recommendations to the city council.

Members of the public can attend the monthly advisory committee meetings, which allow customers to ask questions in a dedicated open forum time in addition to the items on the agenda. The utility also makes more of an effort to connect with the community, such as through informational presentations.

“We have a yearly Gardner U, where each department will present what we do, what the utility is all about, show them what we do, what projects we have for the next couple of years, so they can learn more,” said Garcia.

Mostly, though, the focus has been on initiatives that bolster the values

that kept the utility city owned.

The utility completed installing smart meters in 2022, and, more recently, installed an automatic transfer switch to tie different circuits and remote devices to aid in more seamless restoration and maintenance. Crews are currently focused on replacing old feeders, which Garcia hopes will allow for an even more flexible system in the coming years.

The utility conducts a yearly rate study to examine how it can continue to offer some of the lowest rates in the state. In 2023, the utility focused on reducing the electric fund balance and did away with power cost adjustment charges to residential customers. Garcia said Gardner Energy also lowered its monthly service charge by about half.

Gardner’s population has more than doubled since the early 2000s, and Garcia said the utility is planning for continued residential load growth, including building a fourth substation and upgrading another. He proudly noted how the utility structure has allowed crew members to develop the skills to take on projects and do installation on their own, without relying on contractors.

“We have a very hardworking, professional crew, and residents know about it,” said Garcia. To further recognize his crew’s efforts, the utility



# Congratulations 2024 Winners of the Public Power Customer Satisfaction Award!

This award is a testament to your commitment to providing your customers with top-notch service and recognition of the value you provide to your community.

## **GOLD**

Braintree Electric Light Department,  
Massachusetts

Lowell Light and Power, Michigan

## **SILVER**

Concord Municipal Light Plant, Massachusetts

Grand Haven Board of Light & Power, Michigan

Holland Board of Public Works, Michigan

Kerrville Public Utility Board, Texas

Littleton Electric Light and Water  
Departments, Massachusetts

Merrimac Municipal Light Department,  
Massachusetts

Shrewsbury Electric & Cable Operations,  
Massachusetts

Taunton Municipal Lighting Plant, Massachusetts

Zeeland Board of Public Works, Michigan

## **BRONZE**

Danvers Electric Division, Massachusetts

Grant PUD, Washington

Kaukauna Utilities, Wisconsin

Kissimmee Utility Authority, Florida

Knoxville Utilities Board, Tennessee

Los Alamos County Department  
of Public Utilities, New Mexico

Snohomish County PUD, Washington

Stoughton Utilities, Wisconsin

Sun Prairie Utilities, Wisconsin

**Contact [Membership@PublicPower.org](mailto:Membership@PublicPower.org)  
to learn how your utility can qualify for  
this award in 2025.**

# PUBLIC POWER COMMUNITIES WASHINGTON CITY, UTAH

POPULATION: **32,700**

ELECTRIC CUSTOMERS: **13,000**

UTILITY FORMED: **1988**

UTILITY EMPLOYEES: **13**

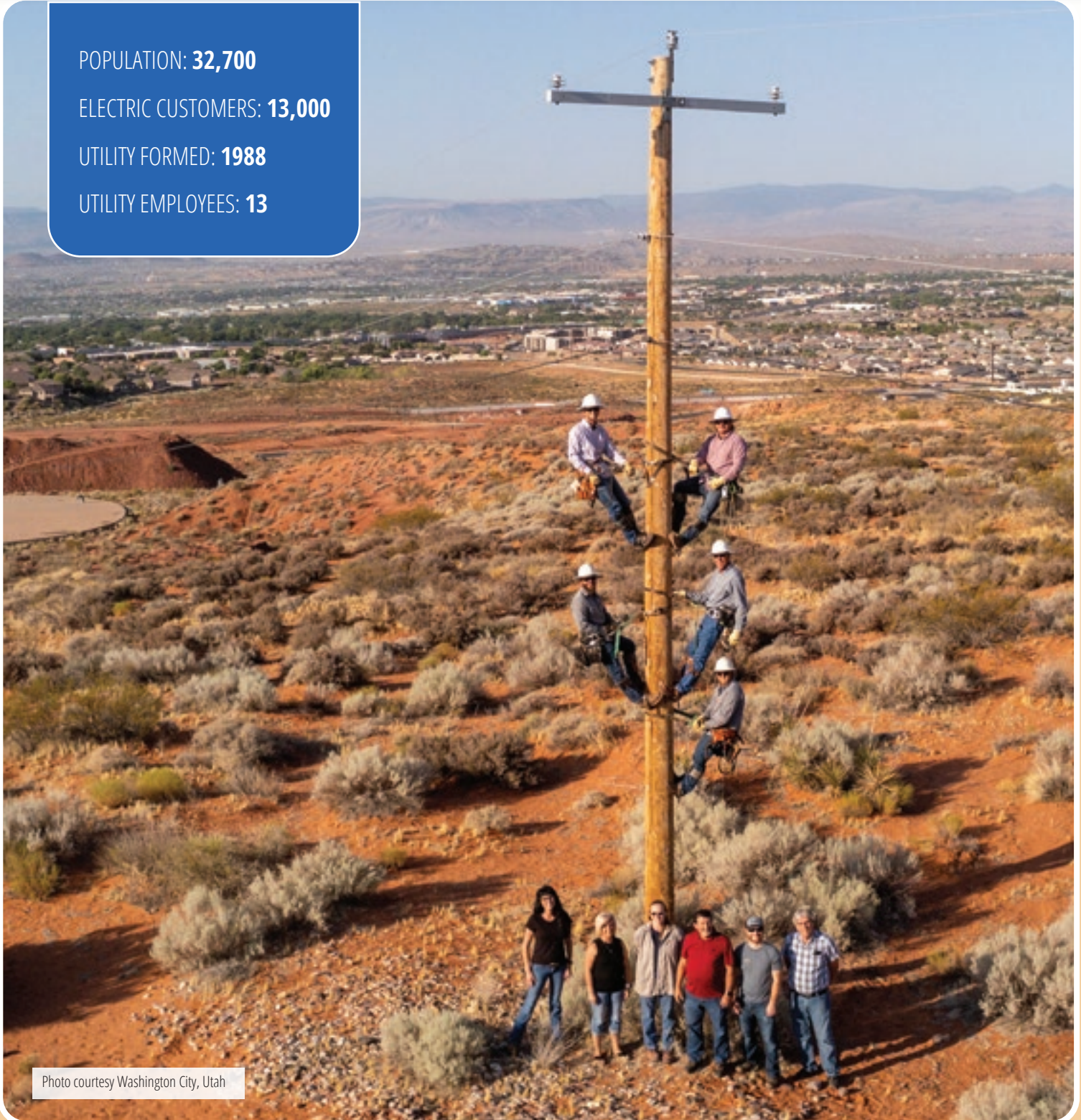



Photo courtesy Washington City, Utah



**S**ince acquiring its electric utility from an investor-owned utility four decades ago, Washington City, Utah has experienced significant growth. The community, which sits outside the city of St. George near the state's southern border, is one of a handful that opted for public power when the IOU in the area was acquired by Utah Power in the late 1980s.

At the time, the electric service hadn't been perceived in a favorable light, and the city's load was about 3,600 kilowatts, said Rick Hansen, electric director for Washington City. He said the system has grown steadily, and while some years saw flat load, the utility has had some years of substantial load growth of 12% or more. The city's demand is now just under 55 megawatts.

Hansen said that the city's growth has been fueled by people choosing to retire to the community, which is not far from major national parks and monuments. He came to work in Washington City from a consulting firm about seven years ago, and agrees it is a nice place to retire. The desert climate means residents don't see much snow and can enjoy hiking and a variety of outdoor activities year-round.

"It's just a good place to work with good people, a good area with lots of things to do," he said.

While people increasingly find the area attractive, the growth does present challenges. Hansen noted how the traffic has worsened, and cost of living has increased, and his team has had its share of work in keeping up by adding substations and securing sufficient power supply.

For the latter, he said Washington City works closely with Utah Associated Municipal Power Systems, a wholesale joint action agency, to ensure the city has a sufficient and diverse supply mix. He said the city is currently looking into securing additional supply from "wind, solar, geothermal, natural gas — all of the above."

Washington City also works closely with the other utilities within the broader area and county, which he said includes four public power utilities, two cooperatives, and an IOU.


"We work well with the other municipalities. If we have a bigger project and we need help, or vice versa, we'll send a crew, share equipment and expertise where we can," said Hansen.

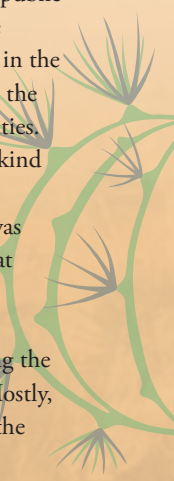
Residents north of the river that bisects the city are served by the public power utility, and residents to the south are served by a coop. So, the utility's 13,000 customers represent about half of everyone who lives in the city. Still, Hansen said the utility works well with the coop, although the sharing of resources isn't as common as among the public power utilities.

"It's really good for this area, we have a lot of non-IOUs, and we kind of stick together and help each other out."

Perhaps this togetherness stems from the city's founding, which was established by pioneers looking to grow cotton in the late 1800s. That history stays alive in the city's annual Cotton Days, which includes a parade, tractor pull, and a variety of other family-friendly events.

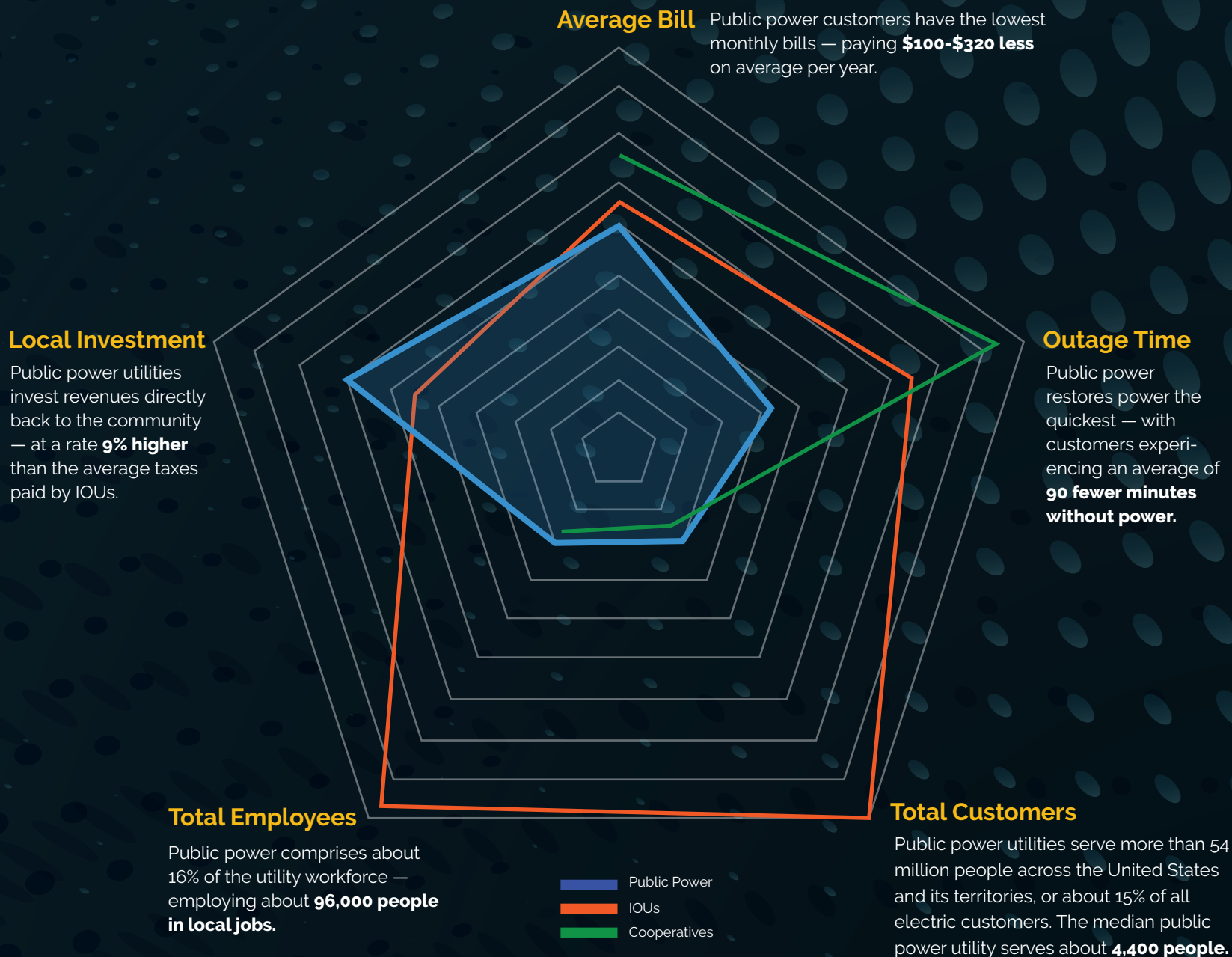
Hansen said the utility employees mainly stay focused on "keeping the lights on," but do some outreach including safety demonstrations. Mostly, it's the crews that are a visible reminder of how the utility works for the city.

"Overall, to help the community have a stable electric supply is what everybody strives to do. We have a great crew that responds quickly to any problems," added Hansen. 



# How **Public Power** Compares to Other Electric Utilities

Public power utilities, which are not-for-profit and community-owned, deliver more than just electricity to their communities. Compared to privately owned utilities, including investor-owned utilities and rural cooperatives, public power utilities have several advantages—customers pay less, have fewer outages, and are governed locally. Public power utilities invest more in their communities, including providing secure, local skilled jobs.



Sources: Energy Information Administration Form EIA-861, 2022; 2024 Public Power Statistical Report; Center for Energy Workforce Development; Public Power Pays Back, 2022

# CONGRATULATIONS

## TO THE 2024 SMART ENERGY PROVIDER DESIGNEES

# W

e salute your commitment to and accomplishments in smart energy planning, efficiency and distributed energy source, environmental and sustainability programs, and customer experience and communication as you provide affordable and reliable electric service to your communities.

Algoma Utilities, Wisconsin

Austin Utilities, Minnesota

Bryan Texas Utilities, Texas

Burbank Water and Power, California

Coldwater Board of Public Utilities, Michigan

City of Colton Electric Utility, California

City of Columbia Utilities, Missouri

City of Eagle River Light & Water Utility, Wisconsin

City Utilities of Springfield, Missouri

City Water, Light & Power, Illinois

City of Negaunee Electric Department, Michigan

City of New Bern, North Carolina

City of Loveland, Colorado

City of Palo Alto Utilities, California

Cuba City Light and Water, Wisconsin

Denton Municipal Electric, Texas

Electrical District No. 3, Arizona

Glendale Water & Power, California

Grand Haven Board of Light & Power, Michigan

Greenville Utilities Commission, North Carolina

Hartford Utilities, Wisconsin

Hingham Municipal Lighting Plant, Massachusetts

Ipswich Electric Light Department, Massachusetts

Juneau Utilities, Wisconsin

Kerrville Public Utility Board, Texas

Knoxville Utilities Board, Tennessee

Nashville Electric Service, Tennessee

New River Light and Power, North Carolina

Northern Wasco County PUD, Oregon

Oberlin Municipal Light & Power System, Ohio

Omaha Public Power District, Nebraska

Owatonna Public Utilities, Minnesota

Pasadena Water & Power, California

PUD No. 1 of Clallam County, Washington

Rochester Public Utilities, Minnesota

Roseville Electric Utility, California

Saint Peter Municipal Utilities, Minnesota

Shrewsbury Electric & Cable Operations, Massachusetts

Slinger Utilities, Wisconsin

Sturgeon Bay Utilities, Wisconsin

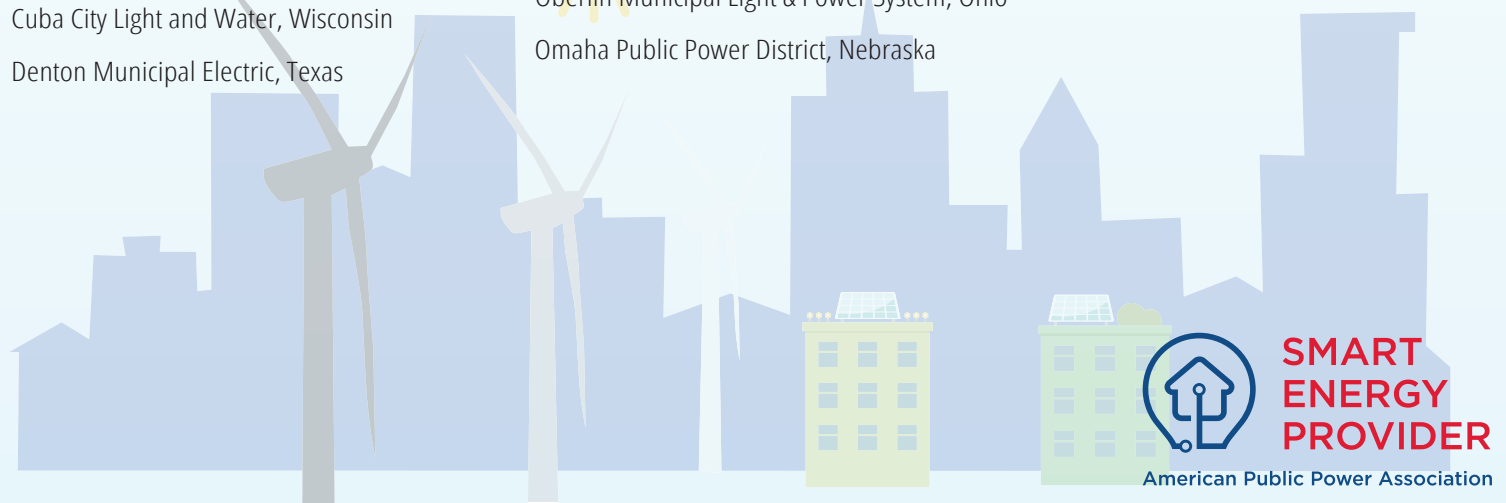
Traverse City Light and Power, Michigan

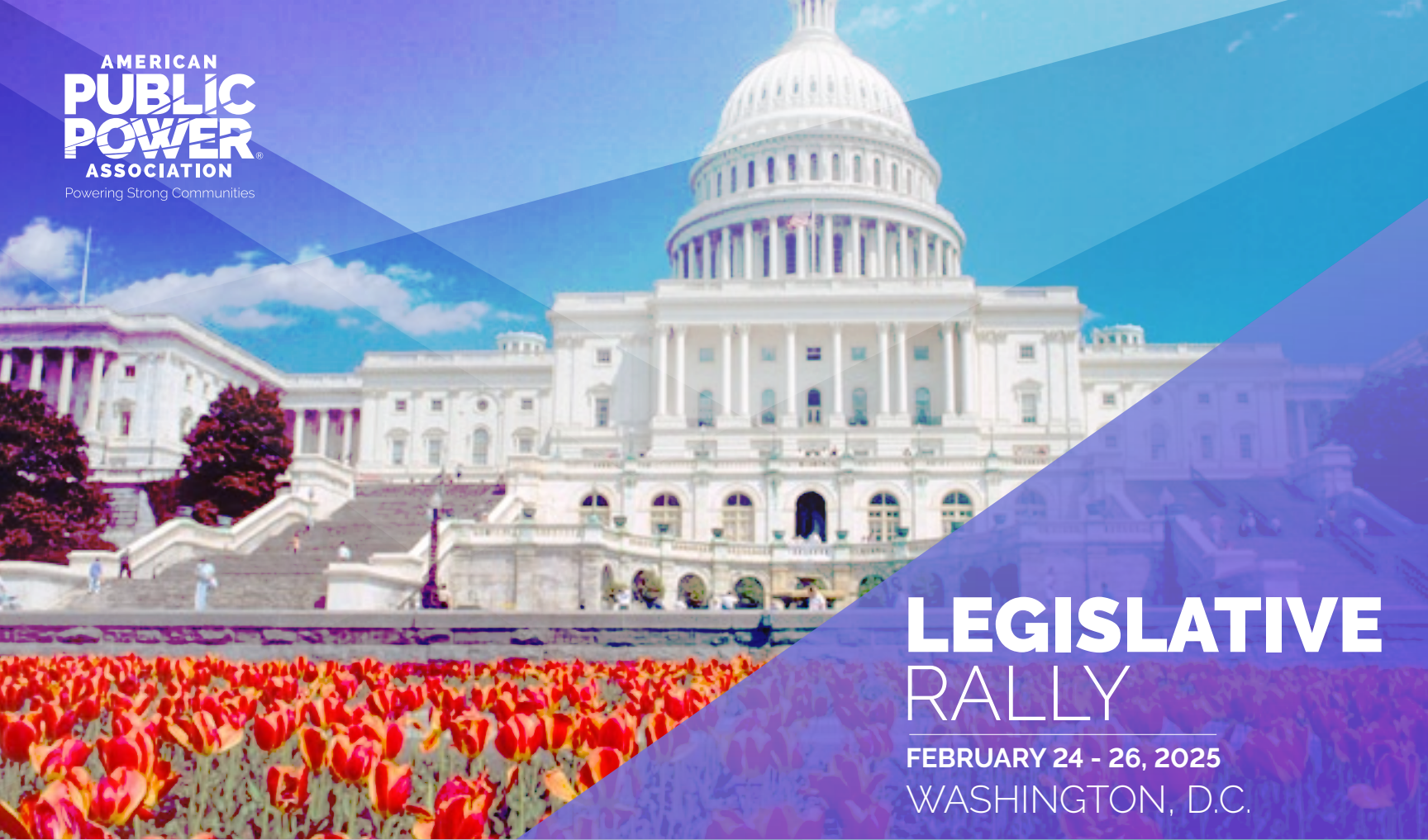
Turlock Irrigation District, California

Village of Jackson Center, Ohio

Waupun Utilities, Wisconsin

Zeeland Board of Public Works, Michigan





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