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Public Power Association, Inc.

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December 1, 2014

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Attention: Docket ID No. EPA-HQ-OAR-2013-0602

EPA Docket Center  
U.S. EPA  
Mail Code 28221T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Attention:** Air and Radiation Docket [EPA-HQ-OAR-2013-0602]

RE: TVPPA Comments on U.S. EPA's Proposed Rule: Carbon Pollution  
Emission Guidelines for Existing Stationary Sources: Electric Utility  
Generation Units

Dear Sir or Madame:

The Tennessee Valley Public Power Association, Inc. ("TVPPA") appreciates the opportunity to comment on the U.S. Environmental Protection Agency's ("EPA") proposal to establish emission guidelines for the States to use in regulating carbon emissions from electric utility generating units. *See* 79 Fed. Reg. 34,829 (June 18, 2014).

TVPPA is an association representing the interests of its 155 municipal and cooperatively owned members who are distributors of Tennessee Valley Authority ("TVA") generated electric power and energy – the power being transmitted through the TVA transmission system. These 155 distributors are located and serve communities throughout the State of Tennessee, and parts of the adjoining States of Alabama, Georgia, Kentucky, Mississippi, North Carolina and Virginia (the "TVA Service Area"). TVPPA is the only association of Local Power Companies ("LPCs") whose membership represents all of the distributors of TVA power from all states in the seven-state TVA region. Each TVPPA-member distributor purchases electric power and energy at wholesale rates from TVA. A list of the members of TVPPA is attached to these comments as Exhibit A.<sup>1</sup> A map of the TVA service area is attached as Exhibit B.

<sup>1</sup> The positions presented herein by TVPPA reflect, to the best of our knowledge, a composite of the views of the LPCs as presently known or learned through the TVPPA board and committee processes. Nevertheless, should any member of TVPPA differ in its views and file its own statement as part of these proceedings, that may, in part, conflict with the views stated here, then TVPPA's comments should not be deemed to represent that particular LPC's views to the extent of such inconsistency.

### **SUMMARY OF TVPPA'S INTERESTS**

TVPPA supports a cleaner energy future. Neither TVPPA nor its members own Electric Generation Units to supply their own needs.<sup>2</sup> TVPPA's LPC members receive from TVA their requirements for their supply of electric power and energy which they in turn distribute to the consumer end-users in the TVA region, composed of some 9 million people, local governments, schools, businesses and industries. Thus, the ratepayers they serve (and for whose benefit these comments are being filed) have a vital interest in this proceeding. For several years TVPPA and its members have been actively engaged in voluntary energy efficiency and demand response ("EEDR") programs by which significant progress has been made in the achievement of carbon emission reductions by TVA. With members who purchase at wholesale more than ninety percent (90%) of TVA's generation of electric power and energy, TVPPA is aware that TVA itself has been, and is, significantly reducing its carbon emissions by investing in new reduced carbon emission generation and transmission infrastructure, as well as supportive of EEDR programs.

### **EPA LACKS AUTHORITY TO PROMULGATE ITS PROPOSED "CLEAN POWER PLAN" RULE WITH RESPECT TO BLOCKS 2, 3 AND 4**

By including Blocks 2, 3 and 4 in the Best System of Emission Reduction ("BSER") in its clean power plan, TVPPA believes EPA is violating the principles of federalism within the United States Constitution. In none of the TVA seven-state service area do the states have legal authority to enact laws, rules or regulations with the effect to direct the shifting of generation among TVA's electric generation units; nor direct TVA or the local power companies to add more low- or zero-emitting generation; or to reach beyond the LPC's point of delivery to direct and control energy efficiency or demand reduction in the homes or businesses.

Notwithstanding TVPPA's belief of EPA's lack of legal authority, TVPPA has serious concerns about EPA's new proposed rule that even if lawfully promulgated as proposed, would result in several adverse effects in that it would:

- (1) have the unintended consequences to threaten or to disrupt the reliability of the Eastern interconnection transmission grid, thus inappropriately burden TVA's ability to supply the requirements of the Local Power

<sup>2</sup> LPCs have in recent years organized a Generation and Transmission Cooperative which owned a 90% interest in a combined-cycle gas-turbine electric generation plant in Southaven, MS which it in turn leased to TVA. TVA purchased the plant from the Cooperative in 2013. TVPPA members are not contractually allowed to directly purchase any of the output from generation sources other than TVA.

Companies (“LPC”) who serve the ultimate electric end-users of TVA power;

- (2) fail to recognize that in economic fairness the ratepayers of the TVA area should receive the benefit a credit toward carbon emission reduction requirements for the voluntary strides TVA made with its voluntary, progressive energy efficiency programs by 2005 and thereafter rather than EPA using a 2012 baseline against which carbon emission reductions are measured;
- (3) fail to recognize the past achievements made by TVA by its 30 percent reduction of carbon emission levels between 2005 and 2013 in its generation and transmission of power and energy supplied to the LPCs; and which the TVPPA member LPCs helped achieve carbon emission reductions from TVA’s generation system through EEDR initiatives actively promoted by the LPCs to the separate individual ratepayers;
- (4) unless substantially modified, imposes an unrealistic goal for the TVA area and in the process also imposes a disparate economic burden on a section of the nation least able to afford it, a population which has already paid for major achievements in carbon emission reductions by its prior voluntary efforts upon its own initiative that were above and beyond the environmental requirements of existing law and regulation; and
- (5) be difficult to enforce EPA’s Block 4, Demand Side Energy Efficiency, on the end-use consumer, notwithstanding the difficulties of measuring and verifying the effectiveness of such efforts as it is not susceptible to being measured or verified. The LPCs deliver the energy to the end-use ratepayer where the in-house or in-business EEDR is controlled by the ratepayer. Neither TVA, a state government nor a LPC has any jurisdiction over the end-use consumer to require any EEDR activities. Nor when a homeowner does initiate EEDR actions, is there a method for the LPC to either know or be able to measure the reductions with any meaningful figures for reporting purposes and securing credit for the carbon emission reduction goals where the end-use ratepayer alters his or her usage for whatever reason.

**CONGRESS HAS RECOGNIZED THE  
TVA SERVICE AREA UNIQUELY QUALIFIES FOR TREATMENT  
ON A REGIONAL BASIS RATHER THAN STATE-BY-STATE**

When Congress enacted the National Energy Act of 1978, it recognized the uniqueness of the TVA region and a need for a distinct regulatory process to achieve the nation’s energy goals as recited in the National Energy Act within that discrete geographic territory comprised of Tennessee and parts of six surrounding states. In the Public Utility Regulatory Policies Act (“PURPA”)

portion of the National Energy Act, for regulatory purposes State Regulatory Authorities such as public utility commissions and public service commissioners were charged with the regulatory oversight of electric energy sale by utilities, with one exception: In the TVA service territory TVA was designated as the State Regulatory Authority for such purposes in its service territory to the exclusion of otherwise what could be or become State regulatory jurisdiction.<sup>3</sup> The apparent Congressional carve-out of the TVA region is obvious: No one state regulatory agency could as a matter of realistic practicability carry out federally directed responsibility over what in all practicality is a closed single utility system offering one planned and operated system composed of generation, transmission and distribution of a large electric utility operating in all or portions of seven contiguous states; and do so in a manageable, consistent and equitable way.

While TVA owns and operates the generation and transmission systems, members of TVPPA own no generation facilities that supply their own needs, and presently cannot supply their own electric power and energy under federal law, policy and the wholesale power supply contracts between TVA and the LPCs. Furthermore, under the U.S. Federal Power Act<sup>4</sup> the LPCs do not have access to transmission services to obtain a supply of electric power and energy from any source other than TVA.<sup>5</sup> Consequently, the municipal and cooperative electric utilities in the TVA region do not have access to transmission systems to import power generated by anyone other than TVA into the TVA territory. Because each LPC purchases its wholesale electric

<sup>3</sup> Public Utility Regulatory Policies Act of 1978, Section 3(17), provides: “(17) The term ‘State regulatory authority’ means any State agency which has ratemaking authority with respect to the sale of electric energy by any electric utility (other than such State agency), **and in the case of an electric utility with respect to which the Tennessee Valley Authority has ratemaking authority, such term means the Tennessee Valley Authority.**” (emphasis supplied.)

<sup>4</sup> U.S. Federal Power Act, Section 212(j).

<sup>5</sup> TVA Act of 1933, as amended, Section 15(d)(a), codified as 16 U.S.C. § Section 831n-4(a):

“Unless otherwise specifically authorized by Act of Congress the Corporation shall make no contracts for the sale or delivery of power which would have the effect of making the Corporation or its distributors, directly or indirectly, a source of power supply outside the area for which the Corporation or its distributors were the primary source of power supply on July 1, 1957, and such additional area extending not more than five miles around the periphery of such area as may be necessary to care for the growth of the Corporation and its distributors within said area: Provided, however, That such additional area shall not in any event increase by more than 2-1/2 per centum (or two thousand square miles, whichever is the lesser) the area for which the Corporation and its distributors were the primary source of power supply on July 1, 1957; And provided further, That no part of such additional area may be in a State now served by the Corporation or its distributors or in a municipality receiving electric service from another source on or after July 1, 1957, and no more than five hundred square miles of such additional area may be in any one State now served by the Corporation or its distributors. . . .”

power requirements to resell to schools, governments, businesses, hospitals, non-profit community organizations, and families in their respective local communities, an unrealistic and unduly expensive EPA rule upon TVA's carbon emissions will pass through directly to the LPC ratepayers. The citizens of the TVA region, a region with lower per capita income, higher poverty rates and higher percentage of elderly and Social Security recipients than most of the rest of the nation, would thus be obligated to fulfill the financial obligations that will be imposed as a result of EPA's proposed rule.

**SIGNIFICANT CONCERNS OF TVPPA FOR ITS MEMBER LOCAL POWER COMPANIES AND THE RATEPAYERS THEY SERVE**

*Investment In Nuclear Energy Electric Generation.* To meet its obligations to deliver power and energy to TVPPA member LPCs, TVA will have invested more than \$4 billion in Watts Bar Nuclear Unit 2. Generation from this plant would account for approximately one-third of Tennessee's emission rate reduction goal but for the methodology of EPA's proposed rule which accounts for an uncompleted nuclear unit in its carbon emission baseline. Because this investment was intended to replace fossil fuel generation and was construction-in-process when EPA proposed the rule which is the subject of this rulemaking proceeding, authority should be granted to the State to allow TVA the credit for carbon emission reductions gained at Watts Bar 2. Because of the long construction time that history demonstrates is required for completion of nuclear plants that plant was not complete and in operation by 2012. EPA's proposal, unless modified, significantly increases the baseline for Tennessee, resulting in penalties even though TVA's early actions will indeed cause a major reduction in carbon emissions as Watts Bar Unit 2 soon replaces fossil fuel generation facilities. It will in all likelihood be on-line generating clean power by late 2015. Therefore, EPA's proposal as published punishes the ratepayers of the TVA region who through long-term power contracts have been, and are, paying for this investment already in their rates and will continue to do so. Such environmental rules result in unfairness and are bad public policy.

*Impractical State-by-State Emission Goals.* EPA's proposal to establish state-by-state emission goals fails to recognize TVA's fleet of generation units include generating units throughout the seven-state TVA region operating as one integral generation and transmission system to supply the demand for energy and power required for the TVPPA member LPC distribution systems, serving the region's demands through a load that is most efficient wherever located while keeping the generation and transmission system in balance. State-by-state environmental control authority is not a feasible approach for TVA. It would impair reliability of electric power supply to end-users for each of the seven states to have an uncoordinated role with each state acting independently with respect to TVA setting limits on TVA's carbon emission outputs. Under such a scenario, TVA cannot keep its regional fleet of diverse

energy sources in balance as it must have the flexibility of direct control on a real time basis to meet the demand upon its generation and transmission system as a whole.

*Inappropriate Base Year for Measuring Carbon Emission Reduction.* EPA's proposed rule does not allow TVA to receive any credit for early actions before 2012. Because TVA upon its own initiative reduced its carbon emissions by than thirty percent (30%) between 2005 and 2013, then the proposed rule consequently requires an excessive and burdensome over-investment by TVA to reach EPA's newly proposed required goals even if reaching those goals was reasonably possible. That financially penalizes the ratepayers of the TVA region served by TVPPA member LPCs.

*Unrealistic Emission Rate Goals.* The emission rate goals in the proposed rule are unreasonably aggressive in the early years for TVA (and the TVPPA-member LPCs) to reasonably achieve. Because there are numerous state planning actions that must be both established and then implemented by 2020 under the proposed rule, the reduction required for TVA to meet EPA's initial 2020 compliance date is an overly ambitious and unachievable goal.

**THE TVA REGION SHOULD NOT BE TREATED INEQUITABLY BY IMPOSING ENVIRONMENTAL COSTS DISPROPORTIONATE TO THE REST OF THE NATION**

For several years, TVA has been taking actions directly to gain greater efficiencies on its own generation assets to achieve cleaner air goals. The TVPPA member LPCs have been progressive, together with TVA's support, in a variety of renewable energy programs, energy conservation, energy efficiency and demand response programs. All of these have contributed to carbon emission reductions in the TVA region. These actions should not be ignored by the EPA in the setting of goals and baselines. TVPPA member LPCs, in cooperation with TVA, have collectively made considerable progress over a period of many years in the facilitation of EEDR programs at the local level that have contributed to the TVA system's reduction of carbon emissions. These efforts have been carried out in an economically sensible way that does not threaten the collective mission of TVA and the LPCs to continue to provide affordable and reliable electricity to the end-use ratepayer. However, the EPA's proposed rule fails to allow TVA to receive credit for those activities, but instead uses them to, in effect, raise the bar higher for TVA area ratepayers to achieve carbon reduction emissions than for other parts of the country. This is an unnecessary and unfair increase in the cost impact on the LPCs' end-use ratepayers, a significant number of which are the least able to pay.

In the operation of their respective electric distribution systems, each LPC member of TVPPA receives all of its revenues from the residents, businesses, educational institutions, nonprofit organizations and governments in their respective service areas of the TVA Region who purchase from the LPCs the

TVA-generated electric power and energy transmitted to the LPCs by TVA at wholesale. That electric power and energy is then distributed to the end-user consumer through electric distribution systems composed of substations, transformers, poles, underground facilities, and lines of wire. The electric power and energy is distributed and sold by the TVPPA member municipal and cooperative distribution systems to the ultimate end-users *without profit but based upon cost of service*. Therefore, it is of vital interest to the municipal and cooperative LPCs who are members of TVPPA where, as appears here, EPA proposes to promulgate new or revised regulations that impose a disproportionate cost of the nation's clean air achievements upon a subset of the nation's population that has already contributed a fair share, if not a greater share, of that cost.

From TVA's municipal and cooperative LPC customers, the TVPPA member LPCs, who are responsible for more than ninety percent (90%) of the operating revenue received by TVA through its sale of power and energy to the citizens, governments, health and educational institutions and businesses; with less than ten percent (10%) remaining revenues received by TVA being from approximately 50 large directly served customers and other federal agencies. To all of these customers, TVA has federal statutory obligations to provide power at rates that are as low as feasible, taking into consideration the economic, social, or physical well-being of people in the TVA service area; to act for the benefit of these citizens as a whole; and to act without discrimination as between consumers or users of the power it produces.

TVA's bond covenants require it to set rates for the sale of TVA power to the municipal and cooperative LPCs and directly served customers in amounts to recover TVA's costs. There are no private stockholder investors to absorb any part of these costs – only the end-use ratepayers served by the TVPPA member LPCs. TVA's wholesale power contracts with its municipal and cooperatively owned LPCs (TVPPA members) require TVPPA-member LPCs of TVA power to likewise and in turn charge rates sufficient to recover their costs, the primary part of which is TVA power which alone typically ranges between 80% and 85% of a LPC's total costs in most instances, with the remaining 15% to 20% for their own distribution and operating costs. Consequently, the real ultimate costs of any EPA-promulgated rule that results in new compliance costs are passed through directly by the LPCs to the end-use ratepayers of the TVA region. TVPPA member LPCs are the only entities and organizations which have the direct relationship with the ultimate end-use ratepayers who will pay the compliance costs required of TVA by an EPA or State requirement to implement any new EPA promulgated standards.

#### CONCLUSION

In conclusion, TVPPA is not insensitive to the need to be environmentally conscious. The LPC members of TVPPA have been progressive and effective

in their advocacy and encouragement of in-home and in-business EEDR programs. TVA's enormous progress in the reduction of its power plant emissions in recent years has been achieved through mostly voluntary, though costly, efforts. The expense of which these efforts were paid directly by the end-use ratepayers served by TVPPA member LPCs.

TVPPA appreciates EPA's interest in soliciting public comments. TVPPA hopes that EPA will consider both the inequitable impacts the proposed rule would, if unchanged, impose upon the TVA Area and on the LPCs' efforts to provide clean, yet affordable and reliable, electric power and energy distributed by the LPCs to the end-use consumer ratepayers of TVA-generated power. For the foregoing reasons and in fairness, TVPPA urges EPA to (1) consider modifying the Proposed Rule taking into consideration the areas of concern as requested above; (2) defer the effective date of any Proposed Rule as revised to further allow consideration by the end-use ratepayers; and (3) take into favorable consideration these comments, as well as any supplemental comments filed by TVPPA hereafter or by any of its members.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack W. Simmons". The signature is written in a cursive, flowing style with a prominent initial "J".

Jack W. Simmons, President & CEO  
Tennessee Valley Public Power Association, Inc.



## EXHIBIT A

### Members of Tennessee Valley Public Power Association, Inc. Municipalities – Rural Electric Cooperatives

- 1 Aberdeen (MS) Electric Department
- 2 Albertville (AL) Municipal Utilities Board
- 3 Alcoa (TN) (City of) Electric Department
- 4 Alcorn County (MS) Electric Power Association
- 5 Amory (MS) Water & Electric
- 6 Appalachian (TN) Electric Cooperative
- 7 Arab (AL) Electric Cooperative, Inc.
- 8 Athens (AL) Electric Department
- 9 Athens (TN) Utilities Board
  
- 10 Benton County (TN) Electric System
- 11 Benton (KY) Electric System
- 12 Bessemer (AL) Electric Service
- 13 Blue Ridge Mountain (GA) Electric Membership Corporation
- 14 Bolivar (TN) Energy Authority
- 15 Bowling Green (KY) Municipal Utilities
- 16 Bristol Tennessee Essential Services
- 17 Bristol Virginia Utilities
- 18 Brownsville (TN) Utility Department
  
- 19 Caney Fork (TN) Electric Cooperative, Inc.
- 20 Carroll County (TN) Electric Department
- 21 Central (MS) Electric Power Association
- 22 Chattanooga (TN) Electric Power Board
- 23 Cherokee (AL) Electric Cooperative
- 24 Chickamauga (GA) Electric System
- 25 Chickasaw (TN) Electric Cooperative
- 26 Clarksville (TN) Department of Electricity (d/b/a CDE Lightband)
- 27 Cleveland (TN) Utilities
- 28 Clinton (TN) Utilities Board
- 29 Columbia (TN) Power & Water Systems
- 30 Columbus (MS) Light & Water
- 31 Cookeville (TN) Electric Department
- 32 Courtland (AL) Electric Department
- 33 Covington (TN) Electric System
- 34 Cullman (AL) Electric Cooperative
- 35 Cullman (AL) Power Board
- 36 Cumberland (TN) Electric Membership Corporation
  
- 37 Dayton (TN) (City of) Electric Department
- 38 Decatur (AL) Utilities
- 39 Dickson (TN) Electric Department
- 40 Duck River (TN) Electric Membership Corporation
- 41 Dyersburg (TN) Electric System
  
- 42 East Mississippi Electric Power Association
- 43 Elizabethton (TN) (City of) Electric Department

## EXHIBIT A

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- 44 Erwin (TN) Utilities
- 45 Etowah (TN) Utilities
  
- 46 Fayetteville (TN) Public Utilities
- 47 Florence (AL) (City of) Utilities
- 48 Forked Deer (TN) Electric Cooperative
- 49 Fort Loudoun (TN) Electric Cooperative
- 50 Fort Payne (AL) Improvement Authority
- 51 4-County (MS) Electric Power Association
- 52 Franklin (AL) Electric Cooperative
- 53 Franklin (KY) Electric Plant Board
- 54 Fulton (KY) Electric System
  
- 55 Gallatin (TN) Department of Electricity
- 56 Gibson (TN) Electric Membership Corporation
- 57 Glasgow (KY) Electric Plant Board
- 58 Greeneville (TN) Light & Power System
- 59 Guntersville (AL) Electric Board
  
- 60 Harriman (TN) Utility Board
- 61 Hartselle (AL) Utilities
- 62 Hickman (KY) Electric Plant Board
- 63 Hickman-Fulton County (KY) Rural Electric Cooperative Corporation
- 64 Holly Springs (MS) Electric Department
- 65 Holston (TN) Electric Cooperative
- 66 Hopkinsville (KY) Electric System
- 67 Humboldt (TN) Utilities
- 68 Huntsville (AL) Utilities
  
- 69 Jackson (TN) Energy Authority
- 70 Jellico (TN) Electric & Water Systems
- 71 Joe Wheeler (AL) Electric Membership Corporation
- 72 Johnson City (TN) Power Board
  
- 73 Knoxville (TN) Utilities Board
  
- 74 LaFollette (TN) Utilities Board
- 75 Lawrenceburg (TN) Utility Systems
- 76 Lenoir City (TN) Utilities Board
- 77 Lewisburg (TN) Electric System
- 78 Lexington (TN) Electric System
- 79 Loudon (TN) Utilities
- 80 Louisville (MS) Utilities
  
- 81 Macon (MS) (City of) Electric Department
- 82 Marshall-DeKalb (AL) Electric Cooperative
- 83 Maryville (TN) (City of) Electric Department
- 84 Mayfield (KY) Electric & Water System

## EXHIBIT A

Page 3

- 85 McMinnville (TN) Electric System
- 86 Memphis (TN) Light, Gas & Water Division
- 87 Meriwether Lewis (TN) Electric Cooperative
- 88 Middle Tennessee Electric Membership Corporation
- 89 Milan (TN) Department of Public Utilities
- 90 Monroe County (MS) Electric Power Association
- 91 Morristown (TN) Utilities Commission
- 92 Mount Pleasant (TN) Power System
- 93 Mountain (TN) Electric Cooperative
- 94 Murfreesboro (TN) Electric Department
- 95 Murphy (NC) Power Board
- 96 Murray (KY) Electric System
- 97 Muscle Shoals (AL) Electric Board
  
- 98 Nashville (TN) Electric Power Board (d/b/a Nashville Electric Service)
- 99 Natchez Trace (MS) Electric Power Association
- 100 New Albany (MS) Light, Gas & Water
- 101 Newbern (TN) Electric, Water & Gas
- 102 Newport (TN) Utilities Board
- 103 North Alabama Electric Cooperative
- 104 North East Mississippi Electric Power Association
- 105 North Georgia Electric Membership Corporation
- 106 Northcentral Mississippi Electric Power Association
  
- 107 Oak Ridge (TN) Electric Department
- 108 Okolona (MS) (City of) Electric Department
- 109 Oxford (MS) (City of) Electric Department
  
- 110 Paducah (KY) Power System <sup>1</sup>
- 111 Paris (TN) Board of Public Utilities
- 112 Pennyrile (KY) Rural Electric Cooperative Corporation
- 113 Philadelphia (MS) Utilities
- 114 Pickwick (TN) Electric Cooperative
- 115 Plateau (TN) Electric Cooperative
- 116 Pontotoc (MS) Electric Power Association
- 117 Powell Valley (TN) Electric Cooperative
- 118 Prentiss County (MS) Electric Power Association
- 119 Princeton (KY) Electric Plant Board <sup>1</sup>
- 120 Pulaski (TN) Electric System (d/b/a PES Energize)
  
- 121 Ripley (TN) Power and Light
- 122 Rockwood (TN) Electric Utility
- 123 Russellville (AL) Electric Board
- 124 Russellville (KY) Electric Plant Board

<sup>1</sup> Presently an Affiliate Member not presently having a wholesale power contract with TVA but eligible to enter into such a contract as being located within the geographic TVA service territory described in 16 USC 831.

## EXHIBIT A

Page 4

- 125 Sand Mountain (AL) Electric Cooperative
- 126 Scottsboro (AL) Electric Power Board
- 127 Sequachee Valley (TN) Electric Cooperative
- 128 Sevier County (TN) Electric System
- 129 Sheffield (AL) Utilities
- 130 Shelbyville (TN) Power System
- 131 Smithville (TN) Electric System
- 132 Southwest Tennessee Electric Membership Corporation
- 133 Sparta (TN) Electric & Public Works
- 134 Springfield (TN) Department of Electricity
- 135 Starkville (MS) Electric System
- 136 Sweetwater (TN) Utilities Board
  
- 137 Tallahatchie Valley (MS) Electric Power Association
- 138 Tarrant (AL) Electric Department
- 139 Tennessee Valley (TN) Electric Cooperative
- 140 Tippah (MS) Electric Power Association
- 141 Tishomingo County (MS) Electric Power Association
- 142 Tombigbee (MS) Electric Power Association
- 143 Trenton (TN) Light & Water Department
- 144 Tri-County (TN) Electric Membership Corporation
- 145 Tri-State (GA) Electric Membership Corporation
- 146 Tullahoma (TN) Board of Public Utilities
- 147 Tupelo (MS) (City of) Light & Water
- 148 Tuscumbia (AL) Electricity Department
  
- 149 Union City (TN) Electric System
- 150 Upper Cumberland (TN) Electric Membership Corporation
  
- 151 Volunteer (TN) Energy Cooperative
  
- 152 Warren (KY) Rural Electric Cooperative Corporation
- 153 Water Valley (MS) (City of) Electric Department
- 154 Weakley County (TN) Municipal Electric System
- 155 West Kentucky Rural Electric Cooperative Corporation
- 156 West Point (MS) (City of) Electric System
- 157 Winchester (TN) Utilities

CENTRAL DISTRICT MANAGERS ASSOCIATION

Municipal Systems: CDE Lightband, Columbia Power & Water Syst., Cookeville Electric Department, Dickson Electric Department, Fayetteville Public Utilities, Gallatin Department of Electricity, Lawrenceburg Utility Systems, Mount Pleasant Power System, Murfreesboro Electric Department, Nashville Electric Service, Pulaski Electric System, Shelbyville Power System, Smithville Electric System, Sparta Electric System, Springfield DOE, Tullahoma Board of Public Util., Winchester Utility Systems

Electric Cooperatives: Caney Fork EC, Cumberland EMC, Duck River EMC, Meriwether Lewis EC, Middle Tennessee EMC, Tri-County EMC, Upper Cumberland EMC, Municipals 19, Cooperatives 7, Total Distributors 26

KENTUCKY PUBLIC POWER ASSOCIATION

Municipal Systems: Benton Electric System, Bowling Green Municipal Utilities, Franklin Electric Plant Board, Fulton Electric System, Glasgow Electric Plant Board, Hickman Electric Plant Board, Hopkinsville Electric System, Mayfield Electric & Water System, Murray Electric System, Russellville Electric Plant Board

Electric Cooperatives: Hickman-Fulton Co. RECC, Pennyrile RECC, Tri-County EMC, Warren RECC, West Kentucky RECC, Municipals 10, Cooperatives 5, Total Distributors 15

WDMA

WESTERN DISTRICT MANAGERS ASSOCIATION

Municipal Systems: Benton County Electric System, Bolivar Energy Authority, Brownsville Utility Department, Carroll County Electric Dept., Covington Electric System, Dyersburg Electric System, Humboldt Utilities, Jackson Energy Authority, Lexington Electric System, Memphis LG&W, Milan Department of Public Utilities, Newbern Electric Water & Gas, Paris BPU, Ripley Power and Light, Somerville Utility Department, Trenton Light & Water Dept., Union City Electric System, Weakley County MES, Electric Cooperatives: Chickasaw Electric Cooperative, Forked Deer Electric Cooperative, Gibson EMC, Pickwick EC, Southwest TN EMC, Tennessee Valley Electric Cooperative, Municipals 18, Cooperatives 6, Total Distributors 24

NMPPA

NORTHEAST MISSISSIPPI PUBLIC POWER ASSOCIATION

Municipal Systems: Aberdeen Electric Department, Amory Water & Electric, Columbus Light & Water, Holly Springs Electric Dept., Louisville Utilities, Macon Electric Department, New Albany Light, Gas & Water, Okolona Electric Department, Oxford Electric Dept., Philadelphia Utilities, Starkville Electric System, Tupelo Light & Water, Water Valley Elec. Dept., West Point Electric System

Electric Cooperatives: Alcorn County EPA, Central Electric Power Association, East Mississippi EPA, 4-County Electric Power Association, Monroe County EPA, Natchez Trace EPA, North East Mississippi EPA, Northcentral Mississippi EPA, Pontotoc EPA, Prentiss County EPA, Tallahatchie Valley EPA, Tippah EPA, Tishomingo County EPA, Tombigbee EPA, Municipals 14, Cooperatives 14, Total Distributors 28

NAPPA

NORTH ALABAMA PUBLIC POWER ASSOCIATION

Municipal Systems: Albertville Municipal Utilities Board, Athens Utilities, Bessemer Electric Service, Courtland Electric Department, Cullman Power Board, Decatur Utilities, Florence Utilities, Fort Payne Improvement Auth., Guntersville Electric Board, Hartselle Utilities, Huntsville Utilities, Muscle Shoals Electric Board, Russellville Electric Board, Scottsboro EPB, Sheffield Utilities

Tarrant Electric Department, Tuscumbia Electricity Department, Electric Cooperatives: Arab Electric Cooperative, Inc., Cherokee Electric Cooperative, Cullman Electric Cooperative, Franklin Electric Cooperative, Joe Wheeler EMC, Marshall-DeKalb Electric Co-op, North Alabama Electric Cooperative, Sand Mountain Electric Co-op, Municipals 17, Cooperatives 8, Total Distributors 25

KPPA

ADPDA

CDMA

SDPDA

SOUTHEASTERN DISTRICT POWER DISTRIBUTORS ASSOC.

Municipal Systems: Athens Utilities Board, Chattanooga Electric Power Board, Chickamauga Electric System, Cleveland Utilities, Dayton Electric Department, Etowah Utilities Department, Loudon Utilities, Murphy Power Board, Rockwood Electric Utility, Sweetwater Utilities Board, Electric Cooperatives: Blue Ridge Mountain EMC, Fort Loudoun Electric Cooperative, North Georgia EMC, Sequachee Valley EC, Tri-State EMC, Volunteer EC, Municipals 10, Cooperatives 6, Total Distributors 16

APPALACHIAN DISTRICT POWER DISTRIBUTORS ASSOC.

Municipal Systems: Alcoa Electric Department, Bristol Tennessee Essential Services, Bristol Virginia Utilities, City of Maryville Electric Department, Clinton Utilities Board, Elizabethton Electric System, Erwin Utilities, Greenville L&P, Harriman Utility Board, Jellico Electric and Water Systems, Johnson City Power Board, Knoxville Utilities Board, LaFollette Utilities Board, Lenoir City Utilities Board, Morristown Power System, Newport Utilities Board, Oak Ridge Electric Department, Sevier County Electric System, Electric Cooperatives: Appalachian EC, Holston Electric Cooperative, Mountain EC, Plateau EC, Powell Valley Electric Cooperative, Municipals 18, Cooperatives 5, Total Distributors 23

TPPPA Districts and Member Service Areas 2014