June 11, 2015

The Honorable Rob Bishop  
Chairman, House Committee on Natural Resources  
1324 Longworth House Office Building  
Washington, DC 20515

Dear Chairman Bishop:

On behalf of the Large Public Power Council (LPPC), I am writing in support of H.R. 2358, the proposed “Electricity Reliability and Protection Act.” LPPC is appreciative of the efforts you have made to take this proposed legislation quickly to hearing as well as your intent to advance H.R. 2358 to a floor vote sometime this year. This bill is very important to our members.

LPPC represents 25 of the largest locally governed and operated not-for-profit electric systems in the United States. Our member utilities are located in 13 states and Puerto Rico and own and operate more than 71,000 megawatts of generation capacity and more than 30,000 circuit miles of high voltage transmission lines. LPPC member utilities supply electricity to some of the largest cities in the country including Los Angeles, Seattle, Omaha, Phoenix, Sacramento, Jacksonville, San Antonio, Orlando and Austin. Importantly, LPPC’s member utilities must strictly comply with the Reliability Standards established by the North American Electric Reliability Corporation under the authority of Section 215 of the Federal Power Act, including those standards relating to vegetation management on transmission line rights-of-way. Violations of Reliability Standards may lead to penalties or sanctions up to $1 million per day per violation.

As you know, H.R. 2358 would amend the Federal Land Policy and Management Act of 1976 by adding a new Section 512. Among other things, Section 512 would make it incrementally less difficult for our member utilities to comply with the important requirements of NERC Standard FAC-003-3 (Transmission Vegetation Management). FAC-003-3 establishes requirements on managing vegetation located on transmission line rights of way as well as minimizing encroachments from ‘hazard trees’ located adjacent to the rights of way, all with the important purpose of minimizing vegetation-related outages. Our member utilities are committed to complying with the requirements of the Federal Land Policy and Management Act as well as with the applicable Reliability Standards established by NERC, all while providing affordable, reliable electric energy to our customers. H.R. 2358 strikes the right balance among these important, competing goals.

Again, thank you for all of your good effort and LPPC looks forward to working with you to move H.R. 2358 through the legislative process and toward enactment.

Sincerely,

John Di Stasio, President  
Large Public Power Council