

CCEC Staff Plan for 2021 PURPA Compliance

Two new PURPA 111(d) standards were enacted in 2021 via the Infrastructure Investment and Jobs Act ("IIJA") (Public Law 117-58). They require non-regulated cooperatives to consider adopting standards on promoting greater transportation electrification (Sec. 40431) and utility demand response (Sec. 40104).

Cass County Electric Cooperative (CCEC) already has policies consistent with, supporting, and implementing the new PURPA standards being considered, as discussed herein. As such, CCEC staff does not request the addition of new or amended policies relative to the new PURPA standards. That said, CCEC staff welcomes the public's comments and recommendations of the Board regarding improvements to the current CCEC policies for compliance with these new PURPA standards that are codified at 16 U.S.C. 2621(20) and (21). The standards, and CCEC's current policies and activities supporting each standard, are identified below.

1. Utility Demand Response (Sec. 40104) **(20) Demand-response practices**

(A) In general – Each electric utility shall promote the use of demand-response and demand-flexibility practices by commercial, residential, and industrial consumers to reduce electricity consumption during periods of unusually high demand.

Cass County Electric Cooperative's Commitment to Demand Response:

In partnership with its power supplier, Minnkota Power Cooperative ("Minnkota"), CCEC helped pioneer its demand response program. The program began in 1977, and now nearly 55,000 consumers participate. The demand response program is a strategic tool to strengthen the grid's reliability while saving member-consumers millions of dollars.

Electricity consumers in the region voluntarily sign up for the program, which allows Minnkota the flexibility to temporarily turn off electric heating, water heaters, vehicle charges, grain drying, and commercial load with on-site backup generation. About 350 megawatts, or about 1/3 of Minnkota's peak load, can be temporarily interrupted from Minnkota's control center in Grand Forks, North Dakota.

CCEC has more than 10,000 members that participate in its demand response program. CCEC continues to promote the advantages of reducing peak demand and saving its members money on their electric bills by participating in the program. The following information highlights CCEC's current promotions with regard to its demand response program:

Promotions – Demand Response:

Website

<https://casscountyelectric.com/energy-management>

<https://casscountyelectric.com/timedayrate>

Brochures

Contractor Guide

<https://casscountyelectric.com/contractor-information>

Business Accounts Guide

<https://casscountyelectric.com/BusinessAccounts>

Monthly Mailed & Emailed Co-op Publication

Highline Notes February 2022 Page 6, Page 9
<https://issuu.com/casscountyelectriccooperative/docs/2022-february-hln>

Highline Notes March 2022 Page 6
<https://issuu.com/casscountyelectriccooperative/docs/2022-march-hln>

Highline Notes April 2022 Page 10
<https://issuu.com/casscountyelectriccooperative/docs/2022-april-hln>

Highline Notes May 2022 Page 7, Page 12
<https://issuu.com/casscountyelectriccooperative/docs/2022-may-hln>

Highline Notes June 2022 Page 4/5
https://issuu.com/casscountyelectriccooperative/docs/2022_june_hln

Highline Notes October 2022 Page 7/8
https://issuu.com/casscountyelectriccooperative/docs/2022_october_hln

Highline Notes January 2023 Page 11
https://issuu.com/casscountyelectriccooperative/docs/2023_january_hln

Highline Notes February 2023 Page 14
https://issuu.com/casscountyelectriccooperative/docs/2023_february_hln

Highline Notes March 2023 Page 10/11
https://issuu.com/casscountyelectriccooperative/docs/2023_march_hln_final_edit

Highline Notes April 2023 Page 8, Page 10
https://issuu.com/casscountyelectriccooperative/docs/2023_hln_april_annual_report

Radio Advertisements

WDAY 970 AM and The Flag AM 1100

"There's a lot of talk about inflation out there, but you know what hasn't risen? Cass County Electric Cooperative's energy rates! And we're looking to save you even more!

Next to heating and cooling your home, water heating is the largest energy user. If you are looking for ways to save money, we may be able to help through our off-peak program. We offer a reduced rate in exchange for the ability to interrupt water heaters.

If you plan to replace heating and cooling equipment in your home – or you're simply building new – call us to hear how you can save with innovative electric technologies on our off-peak program.

Big rebates and an even LOWER electric rate? There's nothing inflated about that. Call Cass County Electric Cooperative or visit CassCountyElectric.Com to save today!"

Questline Residential Digital Newsletter	May 2023
Questline Business Accounts	
CCEC 2021 Recap	February 2022
5 Steps to Lower Peak Demand	June 2022
Sounding the Alarm on Grid Reliability	June 2022
Nation's Electric Grid Could Face Winter Challenges	January 2023
2022 Annual Report	April 2023

(B) Rate Recovery - . . . (ii) Nonregulated electric utilities – A nonregulated electric utility may establish rate mechanisms for the timely recovery of the costs of promoting demand-response and demand flexibility practices in accordance with subparagraph (A).

CCEC's Commitment to Establish Demand Response Rates:

CCEC's rates are set by its Board of Directors, with input from CCEC staff. To ensure its rates are fair and equitable, CCEC hires a national rate consultant every four years to perform a comprehensive cost-of-service study. The rate of return on rate base for demand response rates includes administrative and promotion expenses.

CCEC's demand response rates are 25-50% lower than standard rates because the loads are controlled during coincidental peak demand periods in the winter and summer.

The following information provides examples of the demand response rates CCEC offers to its members:

Demand Response Policy:

1. Energy Innovation - Policy 323
<https://casscountyelectric.com/policy-323-energy-innovation>
2. Rate Schedules - Policy 314
<https://casscountyelectric.com/policy-314>
3. Demand response (off-peak) rates for:
 - Grain drying (rates 6, 8, 628, 658, and 660)
 - Irrigation (rates 400, 401, 410, and 411)
 - Off-peak heating (rates 600, 610, 630, 635, 922, 923, 934, 925, 936, 927, 932, 934, and 936)
 - Water heating
 - Commercial time of use (rate 310)

2. Promoting Transportation Electrification (Sec. 40431)

(21) Electric vehicle charging programs

Each State shall consider measures to promote greater electrification of the transportation sector, including the establishment of rates that—

(A) promote affordable and equitable electric vehicle charging options for residential, commercial, and public electric vehicle charging infrastructure.

CCEC currently has a PILOT Time-of-Day (TOD) rate. The TOD rate allows members to reduce energy costs by shifting their usage times to off-peak hours. Electric vehicle ("EV") chargers are a load that will fit this rate perfectly. Members can charge their EVs during low-demand hours with discounted electric rates. CCEC also has a fixed off-peak electric rate available for members with EVs and a rebate for EV chargers installed on the program. CCEC performs cost-of-service studies to ensure all members' rates are fair and equitable.

TOD pilot rate

<https://casscountyelectric.com/timedayrate>

EV (Off-peak rates)

<https://casscountyelectric.com/electric-vehicles>

Promotions – Electric vehicle charging programs

CCEC promotes EVs and EV charging on its website with YouTube videos highlighting the first EV school bus in North Dakota and the first EV motorcycle in North Dakota. The EV motorcycle is part of the Fargo Police Department's fleet, and the EV school bus is in the West Fargo Public School's fleet, both of which were promoted and sponsored by CCEC. Also promoted on the CCEC website is general information on EVs, charging options and locations, and CCEC programs, including off-peak rates, rebates, and the TOD pilot rate. CCEC sends information regarding EVs and EV charging to the membership via CCEC's newsletter (Highline Notes), the Contractor Guide, Business Accounts and Residential newsletters, and bill-stuffers. See the links below.

Website

<https://casscountyelectric.com/electric-vehicles>

Monthly Mailed & Emailed CCEC Publication

Highline Notes	February 2022	Page 8, Page 13
		https://issuu.com/casscountyelectriccooperative/docs/2022-february-hln
Highline Notes	August 2022	Page 4/5, Page 10
		https://issuu.com/casscountyelectriccooperative/docs/2022_august_hln
Highline Notes	September 2022	Page 12
		https://issuu.com/casscountyelectriccooperative/docs/2022_september_hln
hln		
Highline Notes	October 2022	Page 7
		https://issuu.com/casscountyelectriccooperative/docs/2022_october_hln

Contractor Guide

<https://casscountyelectric.com/contractor-information>

Business Accounts Guide

<https://casscountyelectric.com/BusinessAccounts>

Questline Business Accounts

Charge Up Your Forklifts: 5 Reasons to Go Electric	February 2022
Do's and Don'ts: Transitioning Your Fleet to Electric	April 2022
5 Steps to Switching to Electric Fleets	July 2022
3 Energy Trends to Watch in 2023	January 2023
Getting Your Building Ready for Electric Vehicles	April 2023

(B) improve the customer experience associated with electric vehicle charging, including by reducing charging times for light-, medium-, and heavy-duty vehicles.

CCEC promoted the installation of three Level-3 EV chargers in the Fargo area through the Volkswagen settlement funds. CCEC has also sponsored four Level-2 chargers at various businesses and CCEC service centers in Arthur, Kindred, Lisbon, Valley City, and Fargo, North Dakota.

CCEC-Sponsored EV Charging

<https://casscountyelectric.com/electric-vehicles>

Level 2 Chargers

- West Acres Mall
- Hornbacher's Grocery store
- CCEC service center
- Sanford Hospital

Level 3 Chargers

- Fargo Convention and Visitor Center
- West Acres Mall
- Hornbacher's Grocery store

(C) accelerate third-party investment in electric vehicle charging for light-, medium-, and heavy-duty vehicles; and

CCEC's Business Accounts team incorporated educational and informational material regarding EVs and EV charging into the materials used for in-person member visits. This information is included in direct mailings via the Business Accounts Newsletter. CCEC also works with City and State Governments to educate on electrifying main traffic corridors and preparing for EVs.

(D) appropriately recover the marginal costs of delivering electricity to electric vehicles and electric vehicle charging infrastructure.

CCEC currently has a PILOT TOD rate. The TOD rate allows members to reduce energy costs by shifting their usage times to off-peak hours. EV chargers are a load that will fit this rate perfectly. Members can charge their EVs during low-demand hours with discounted electric rates. CCEC also has a fixed off-peak electric rate available for members with EVs and a rebate for EV chargers installed on the program. CCEC performs cost-of-service studies to ensure all members' rates are fair and equitable.