UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Complaint of Michael Mabee)	
Related to Critical Infrastructure)	Docket No. EL20-46-000
Protection Reliability Standards)	

MOTION TO EXCLUDE EDISON ELECTRIC INSTITUTE FROM INTERVENING IN THIS DOCKET AND MOTION TO REQUIRE CERTIFICATION FOR ELECTRIC INDUSTRY AND TRADE ASSOCIATION INTERVENTION

Submitted to FERC on May 13, 2020

I am the Complainant in this docket. I file these two motions pursuant to 18 CFR § 385.212 (Rule 212).

Background

On May 4, 2020, the President of the United States declared a national emergency and issued Executive Order 13920: "Securing the United States Bulk-Power System." The order defines:

The term "foreign adversary" means any foreign government or foreign non-government person engaged in a long-term pattern or serious instances of conduct significantly adverse to the national security of the United States or its allies or the security and safety of United States persons.

The Government of the People's Republic of China has long been viewed as a foreign adversary of the United States. Specifically, in 2019 the Director of National Intelligence stated:²

Our adversaries and strategic competitors will increasingly use cyber capabilities—including cyber espionage, attack, and influence—to seek political, economic, and military advantage over the United States and its allies and partners. China, Russia, Iran, and North Korea increasingly use cyber operations to threaten both minds and machines in an expanding number of ways—to steal information, to influence our citizens, or to disrupt critical infrastructure.

The director of National Intelligence also stated:

¹ Available at: https://www.govinfo.gov/content/pkg/FR-2020-05-04/pdf/2020-09695.pdf (Accessed May 10, 2020).

² Coats, Daniel R. Director of National Intelligence (DNI) "Worldwide Threat Assessment of the U.S. Intelligence Community" Senate Select Committee on Intelligence. January 29, 2019. Available at: https://www.dni.gov/files/ODNI/documents/2019-ATA-SFR---SSCI.pdf (Accessed May 10, 2020).

China presents a persistent cyber espionage threat and a growing attack threat to our core military and critical infrastructure systems. China remains the most active strategic competitor responsible for cyber espionage against the US Government, corporations, and allies. It is improving its cyber attack capabilities and altering information online, shaping Chinese views and potentially the views of US citizens—an issue we discuss in greater detail in the Online Influence Operations and Election Interference section of this report.

- Beijing will authorize cyber espionage against key US technology sectors when doing so addresses a significant national security or economic goal not achievable through other means. We are also concerned about the potential for Chinese intelligence and security services to use Chinese information technology firms as routine and systemic espionage platforms against the United States and allies.
- China has the ability to launch cyber attacks that cause localized, temporary disruptive
 effects on critical infrastructure—such as disruption of a natural gas pipeline for days to
 weeks—in the United States.

Edison Electric Institute's Ties to a Foreign Adversary as Defined in Executive Order 13920.

Edison Electric Institute (EEI) is the trade organization that purports to represent "all U.S. investor-owned electric companies." EEI is a frequent intervenor and commenter in FERC dockets related to Critical Infrastructure Protection (CIP) standards and issues. EEI spends millions of dollars annually lobbying the U.S. Congress on matters pertaining to the U.S. Critical infrastructure. EEI also makes contributions to key members of Congress involved in critical infrastructure security legislation.

Attached as Exhibit A is EEI's member list, dated February 2020 which I downloaded from EEI's website on May 10, 2020.⁷ EEI counts among its members State Grid Corporation of China, which is a state-owned corporation, owned by the government of the People's Republic of China. EEI also counts as a member Power Assets Holdings, a company based in Hong Kong (which China calls "Hong Kong Special Administrative Region of the People's Republic of China").

Attached as Exhibit B is EEI's member list dated February 2020 which I downloaded from EEI's website on April 10, 2020. In this version, EEI counted among its members State Grid Corporation of China as well as China Southern Power Grid Co. Both of these are state-owned entities, owned by the government of the People's Republic of China. EEI also counts as a member Power Assets Holdings, a company based in Hong Kong (which China calls "Hong Kong Special Administrative Region of the People's Republic of China").

https://www.eei.org/about/members/uselectriccompanies/Documents/memberlist_print.pdf

³ See: https://www.eei.org/about/Pages/default.aspx (accessed May 10, 2020).

⁴ See, for example, FERC Dockets EL20-21-000, AD19-18-000, RM15-14-000 and NP19-4-000.

⁵ See: https://www.opensecrets.org/federal-lobbying/clients/summary?cycle=2018&id=D000000297 (accessed May 10, 2020).

⁶ See: https://www.opensecrets.org/pacs/pacgot.php?cycle=2018&cmte=C00095869 (accessed May 10, 2020).

⁷ Downloaded on May 10, 2020 from

Attached as Exhibit C is EEI's member list dated May 2019 which I downloaded from EEI's website on May 29, 2019. In this version, EEI counted among its members State Grid Corporation of China as well as China Southern Power Grid Co. Both of these are state-owned entities, owned by the government of the People's Republic of China. EEI also counts as a member Power Assets Holdings, a company based in Hong Kong (which China calls "Hong Kong Special Administrative Region of the People's Republic of China").

These three Chinese companies have an obligation under the 2017 Chinese National Intelligence Law to "support, assist and cooperate with the state intelligence work." Moreover, under China's 2014 Counter-Espionage Law⁸ a company may not refuse the Chinese government when asked for information. In fact, according Dr. Murray Scot Tanner's Lawfare Institute analysis:⁹

"The Intelligence Law, by contrast, repeatedly obliges individuals, organizations, and institutions to assist Public Security and State Security officials in carrying out a wide array of 'intelligence' work. Article Seven stipulates that 'any organization or citizen shall support, assist, and cooperate with state intelligence work according to law.' Article 14, in turn, grants intelligence agencies authority to insist on this support: 'state intelligence work organs, when legally carrying forth intelligence work, may demand that concerned organs, organizations, or citizens provide needed support, assistance, and cooperation.' Organizations and citizens must also protect the secrecy of 'any state intelligence work secrets of which they are aware'."

So, at least three members or former members of the Edison Electric Institute have an obligation to provide information and assistance to the government of the People's Republic of China.

In other words, the government of the People's Republic China—the very government that has been hacking the North American electric grid for years—is, a for all intents and purposes, a member of Edison Electric Institute through its state owned corporations and other entities that owe their allegiance and obligations to the PRC.

Moreover, Chinese companies have been "affiliates" of EEI since at least 2014, ¹⁰ and State Grid Corporation of China has been a member of EEI since at least 2016. ¹¹ Exhibit D is EEI's February 2016 Member List.

The relationship seems far from casual: Exhibit E is the EEI's press release on June 6, 2018 when EEI awarded State Grid Corporation of China "Edison Electric Institute's (EEI's) 2018 International Edison Award."¹²

⁸ https://www.reuters.com/article/us-china-lawmaking-spy-idUSKBN0IL2N520141101 (accessed May 10, 2020).

⁹ https://www.lawfareblog.com/beijings-new-national-intelligence-law-defense-offense (accessed May 10, 2020).

¹⁰ See EEI's website on February 14, 2014 archived at:

https://web.archive.org/web/20140214141920/http://www.eei.org/about/members/internationalaffiliates/Pages/interaffiliatelist.aspx (accessed May 10, 2020).

¹¹ See EEI's website on October 11, 2016 archived at:

https://web.archive.org/web/20161011162447/http:/www.eei.org/about/members/internationalaffiliates/Pages/interaffiliatelist.aspx (accessed May 10, 2020).

¹² Also available at: http://www.eei.org/resourcesandmedia/newsroom/Pages/Press Releases/State Grid Corporation of China Wins EEI's 2018 International Edison Award0606-2042.aspx (accessed May 10, 2020).

Exhibit F is a press release from the State-owned Assets Supervision and Administration Commission of the State Council (SASAC) announcing State Grid Corporation of China's receipt of the EEI "Edison Award." Note that the SASAC "is an ad-hoc ministerial-level organization directly subordinated to the State Council. The Party Committee of SASAC performs the responsibilities mandated by the Central Committee of the Chinese Communist Party." 14

Exhibit G is a press release from the China Electricity Council (CEC)¹⁵ announcing that EEI and the China Electricity Council (whose "President Member" is the State Grid Corporation of China¹⁶) entered into a formal "memorandum of understanding" (MOU).

Exhibit H is EEI's press release on this MOU between EEI and the China Electricity Council.¹⁷ This picture is included in EEI's press release:



Photo Source: Edison Electric Institute

https://www.eei.org/resourcesandmedia/energynews/Pages/EEI%20and%20China%20Electricity%20Council%20Sign%20MOU.aspx (accessed May 10, 2020).

¹³ Also available at: http://en.sasac.gov.cn/2018/06/07/c 98.htm (accessed May 11, 2020).

¹⁴ See: http://en.sasac.gov.cn/aboutus.html (accessed May 11, 2020).

¹⁵ Also available at: http://english.cec.org.cn/No.105.1619.htm (accessed May 10, 2020).

¹⁶ See: http://english.cec.org.cn/No.86.index.htm (accessed May 11, 2020).

¹⁷ Also available at:

While Edison Electric Institute may be free to have whomever it wishes as members, associates and awardees, it is not in the public interest for an organization with such ties to a foreign adversary, as defined in Executive Order 13920, to intervene in a docket involving issues of U.S. national security.

Motion to Exclude Edison Electric Institute from Intervening in this Docket

For the reasons above, FERC should EXCLUDE Edison Electric Institute from Intervention in this docket due to their membership including a foreign adversary as defined in Executive Order 13920 and their affiliations with entities controlled by a foreign adversary as defined in Executive Order 13920.

Motion to Require Certification for Electric Industry and Trade Association Intervention

For the reasons above, FERC should require that any trade organization or investor owned utility wishing to intervene in this docket certify that it has no affiliation, members, interests or shareholders who are entities or governments that are a foreign adversary as defined in Executive Order 13920.

Respectfully submitted,

Michael Mabee

Attachments: Exhibits A through H

Certification:

I certify that a copy of this document was served on the Electric Reliability Organization (ERO) and Edison Electric Institute (EEI) simultaneously with my filing with the Commission.

Michael Mabee

me_

Exhibit A To May 13, 2020 Motion In Docket No. EL20-46-000 Submitted by Michael Mabee



Power by Association*



U.S. Investor-Owned Electric Companies
International Members
Associate Members

The Edison Electric Institute, is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members. Organized in 1933, EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums.

U.S. Energy Companies

AES Corporation

Dayton Power & Light Company Indianapolis Power & Light Company

Alaska Power & Telephone Company

ALLETE

Minnesota Power

Superior Water, Light and Power Company

Alliant Energy
Ameren Corporation
Ameren Illinois
Ameren Missouri
American Electric Power

AEP Ohio AEP Texas

Appalachian Power Company Indiana Michigan Company Kentucky Power Company

Public Service Company of Oklahoma Southwestern Electric Power Company

American Transmission Company

AVANGRID

Central Maine Power

New York State Electric & Gas Rochester Gas & Electric The United Illuminating Company

Avista Corporation Avista Utilities

Alaska Electric Light and Power Company

Berkshire Hathaway Energy MidAmerican Energy Company

NV Energy
PacifiCorp
Pacific Power
Rocky Mountain Power

Black Hills Corporation Black Hills Energy CenterPoint Energy Vectren

Central Hudson Gas & Electric Corp.

Cleco Corporate Holdings

CMS Energy

Consumers Energy Consolidated Edison

Consolidated Edison Company of New York

Orange and Rockland Utilities Cross Texas Transmission Dominion Energy

DTE Energy

Duke Energy

Duquesne Light Company Edison International

Southern California Edison

El Paso Electric

Entergy Corporation

Entergy Arkansas Entergy Louisiana Entergy Mississippi Entergy New Orleans Entergy Texas

Evergy

Eversource Energy Exelon Corporation Atlantic City Electric

> BGE ComEd Delmarva Power PECO Pepco

FirstEnergy Corp.

The Illuminating Company Jersey Central Power & Light

Met-Ed Mon Power Ohio Edison Penelec Penn Power Potomac Edison Toledo Edison West Penn Power Florida Public Utilities Green Mountain Power

Hawaiian Electric Industries
Hawaiian Electric Company
Hawaii Electric Light Company

Maui Electric Company

IDACORP
Idaho Power
ITC Holdings Corp.
ITC Great Plains
ITC Michigan
ITC Midwest
Liberty Utilities
Empire District

MDU Resources Group

Montana-Dakota Utilities Company

MGE Energy

Madison Gas and Electric Company
Mt. Carmel Public Utility Company

National Grid NextEra Energy

Florida Power & Light Company

Gulf Power NiSource

Northern Indiana Public Service Company

NorthWestern Energy OGE Energy Corporation

Oklahoma Gas & Electric Company

Ohio Valley Electric Corporation

Oncor

Otter Tail Corporation
Otter Tail Power Company

PG&E Corporation

Pacific Gas & Electric Company Pinnacle West Capital Corporation Arizona Public Service Company

PNM Resources PNM TNMP

Portland General Electric

PPL Corporation
PPL Electric Utilities
LG&E and KU Energy
Public Service Enterprise Group

Public Service Electric & Gas Company

PSEG Long Island Puget Sound Energy

San Diego Gas & Electric Company

Sharyland Utilities Southern Company

Alabama Power Company Georgia Power Company Mississippi Power Company Tampa Electric an Emera Company

Tennessee Valley Authority - EEI Strategic Partner

UGI Corporation
 UGI Utilities
Unitil Corporation
UNS Energy Corporation
 Tucson Electric Power
 UniSource Energy Services
Upper Peninsula Power Company
Vermont Electric Power Company

WEC Energy Group We Energies

Wisconsin Public Service

Upper Michigan Energy Resources

Xcel Energy

International Members

AES Corporation

Alectra - Canada Altalink - Canada

APR Energy - United States
ATCO Electric - Canada

Bahamas Power and Light - Bahamas

Belize Electricity - Belize

Bermuda Electric Light (BELCO) - Bermuda

Brookfield Renewables - Canada Capital Power Corp. - Canada Chubu Electric Power - Japan

Compagnie Ivoirienne d'Electricité (CIE) - Ivory

Companhia Energetica de Minas Gerais (CEMIG) - Brazil

EDF - France EDP - Portugal

Electricity Supply Board - Ireland

Emera, Inc. - Canada

Barbados Light & Power - Barbados Dominica Electricity Services Ltd. - Island of

Dominica

Nova Scotia Power Inc. - Canada

St. Lucia Electricity Services (LUCELEC) - West Indies

Endeavour Energy - Australia

Enel - Italy ENGIE - France ENMAX - Canada

Entegrus Powerlines - Canada

Electricity Generation Company Malawi - Malawi

Fortis, Inc. - Canada

Caribbean Utilities - Cayman Islands

FortisAlberta - Canada FortisBC Electric - Canada Maritime Electric - Canada

Gulf Cooperation Council Interconnection Authority (GCCIA) - Saudi Arabia Guyana Power and Light – Guyana

Hydro One - Canada Hydro Ottawa - Canada Hydro-Québec - Canada Iberdrola - Spain

Iberdrola - Spain Jemena - Australia J-Power - Japan

Kansai Electric Power - Japan Korea Electric Power (KEPCO) - Korea

Manitoba Hydro - Canada National Grid - United Kingdom

Ontario Power Generation (OPG) - Canada Orion New Zealand Ltd. - New Zealand PGE Polska Grupa Energetyczna S.A. - Poland

Power Assets Holdings - Hong Kong

Powerco Ltd. - New Zealand SaskPower - Canada

St. Vincent Electricity Services (VINLEC) - West Indies

State Grid Corporation of China (SGCC) - China

TasNetworks - Australia Tohoku Electric Power - Japan Tokyo Electric Power (TEPCO) - Japan

Toronto Hydro - Canada

Transpower New Zealand Ltd. - New Zealand

UK Power Networks - United Kingdom Unison Networks Ltd. - New Zealand

Vector Ltd. - New Zealand Wellington Electricity - New Zealand

Associates

Power-Plus Members

Black & Veatch General Electric Guidehouse Oracle PowerPlan Quanta Services

Power Members

Aclara
Deloitte
EY
Google
Pike Electric
Troutman Sanders

Uplight Uptake Urbint

Utilities International

Associate Members

ABB Inc. Accenture

AccuWeather Enterprise Solutions

Aclara

Advanced Microgrid Solutions

Adventech, LLC

AECOM

AEGIS Insurance Services, Inc

Aggreko

Akin Gump Strauss Hauer & Feld, LLP Allan Briteway Electrical Utility Contractors, Inc.

Alston & Bird LLP Altec Inc.

American Water

American Wholesale Lighting
American Wind Energy Association

Ampirical Anixter Inc. Anterix

Aon Global Power

APTIM
ARCOS LLC
Ardmore Roderick
Asplundh
Atlantica Yield

AutoGrid Systems

Atwell, LLC

Babcock & Wilcox Company, The

Bain & Company, Inc Baker Botts L.L.P. Balch & Bingham LLP

Bidgely Black & Veatch

Bosch Security and Safety Systems Boston Consulting Group, The

Bracewell LLP

Bright Investments, LLC
Bruce & Merrilees Electric Co

Burns & McDonnell Engineering Co. Inc.

Carmen L Gentile, PLLC

Caterpillar Inc.

CBRE Clarion Securities Chapman and Cutler LLP Charles River Associates Choate, Hall & Stewart LLP

Citi

CohnReznick

Commonwealth Associates, Inc. Concentric Energy Advisors, Inc. Corpfinance International Limited

Crowell & Moring LLP

CS Week

Cupertino Electric, Inc.

CyberCon Power & Utilities Cybersecurity

Conference D&D Power Inc Danella Companies, Inc Darcy Partners

David Evans and Associates Davis H. Elliot Company, Inc. Davis Wright Tremaine LLP

Day Pitney LLP Deloitte

Disaster Resource Group

Distributed Energy Financial Group
DNV GL Energy Services USA

Dorsey & Whitney LLP

E Source Eaton Corporation e-Hazard.com EHS Partners, LLC

Electric Conduit Construction Electrical Consultants, Inc. EN Engineering, LLC Enchanted Rock LLC

Energy Management Collaborative (EMC)

EnergyHub Inc

Environmental Consultants, Inc.

Ephektiv EQ by Equiniti Essential Utilities ESTA International, LLC

EVBox Evercore

Eversheds Sutherland

ΕY

Faegre Baker Daniels, LLP FDH Infrastructure Services, LLC

Ferreira Power West First Solar, Inc.

Flagger Force Traffic Control Services

Fortress Information Security Frost Brown Todd LLC FTI Consulting, Inc. Gap International General Electric Gibson Dunn & Crutcher

Google

Grid Capital Advisors Guidehouse Associate Members (cont'd)

HDR

Heidrick & Struggles
Hemma Lighting Solutions
Henkels & McCoy Group
Hogan Lovells US LLP
Holland & Knight LLP
Hunton Andrews Kurth LLP
Huron Consulting Group

IBM Corp

IHS Global Inc.

Infratech Corporation
Innogy Consulting Americas

International Technology and Trade Associates,

Inc. (ITTA) ISC2, Inc. ITRON, Inc.

Japan Electric Power Information Center, USA

Jenner & Block LLP Jones Day K&L Gates LLP Kiewit Corporation Kinetics Consulting LLC

KORE Power KPMG LLP Landis+Gyr Inc. Latham & Watkins

Leidos

Lignite Energy Council Lindsey Manufacturing Co.

Loeb & Loeb LLP Logisticus Group Lucasys Lytx

M&S Engineering, LLC Magesco, Inc.

MaintenX International Marison Energy Systems maslansky + partners

MasTec Transmission - Substation Group

McCarter & English, LLP McGuireWoods LLP McKinsey & Co

Michael Best & Friedrich LLP MICHELS Corporation Microsoft Corporation

Midwest Energy Efficiency Alliance Midwest Energy Emissions Corp Milbank, Tweed, Hadley & McCloy LLP

Miller & Chevalier Chartered

Milwaukee Tool

Mitsubishi Electric Power Products, Inc. Mitsubishi Hitachi Power Systems Americas, Inc.

Modus Strategic Solutions Moelis & Company

Moran Environmental Recovery, LLC Morgan, Lewis & Bockius LLP Mortenson Construction

MOSAIC

Munger, Tolles & Olson LLP

MYR Group Inc New Context Services

Novinium

Nuclear Electric Insurance Limited

Oliver Wyman

OMICRON electronics Corp. USA

Oracle Corporation
Orbital Engineering
Osborn Maledon P.A.

Osmose Utilities Services, Inc.

Pace Global

Parker Poe Adams & Bernstein, LLP Peak Load Management Alliance Pegasus Global Holdings, Inc.

Perkins Coie LLP Pierce Atwood LLP Pike Electric, LLC

Pillsbury Winthrop Shaw Pittman LLP

PLH Group, Inc.
POWER Engineers, Inc.
PowerAdvocate, Inc.

PowerGrid Services, Collective Storm Response

PowerPlan, Inc.

PwC

Quanta Services Quarles & Brady LLP Recurrent Energy Reed Smith LLP

Regulated Capital Consultants Rexel Energy Solutions RHR International LLP Roland Berger, LLC S&C Electric Company

Sagewell, Inc. Sargent & Lundy, LLC Schiff Hardin LLP Schneider Electric

Schweitzer Engineering Laboratories, Inc. (SEL)

ScottMadden, Inc.

Sensus
Sentient Energy
Sharper Shape Inc
Shelton Group
Sidley Austin LLP
Siemens Energy, Inc.
Sierra Nevada Corporation

Skadden, Arps, Slate, Meagher & Flom LLP

Smart Electric Power Alliance

Sparks Energy Inc.
SPE Utility Contractors
Spencer Stuart
SSP Innovations
Stanley Consultants, Inc.
Stantec Consulting Services, Inc.

Stem, Inc.

Steptoe & Johnson, LLP

Sterling Site Access Solutions, LLC

Stikeman Elliott LLP Stinson LLP

Stoll Keenon Ogden PLLC Storm Services, LLC

Strategic Cyber Holdings (CyberGym NYC)

Taft Stettinius & Hollister LLP Technical Consumer Products

Tempest Energy, LLC Tenaska Marketing Ventures

Terex Utilities

Terra Drone Corporation

Terracon
The Desoto Group
TPC Training
Transventure Energy
TRC Companies

Trilliant

Trinity Cyber, Inc. Troutman Sanders LLP

Ulteig

United States Energy Association

Uplight
Uptake
Urbint
USIC
Utegration

UtiliCon Solutions, Ltd.
Utilities International, Inc.

Utilligent LLC

Van Ness Feldman, LLP

Vestas - American Wind Technology

Veteran Power, Inc. Viking Mat Company Vinson & Elkins LLP

Virtuoso Sourcing Group, LLC

Volkert, Inc.

Wartsila North America, Inc.
Waste Management, Inc.
West Monroe Partners
White & Case LLP
Wilson Construction Co.

Wood

Wright & Talisman, P.C.



Exhibit B To May 13, 2020 Motion In Docket No. EL20-46-000 Submitted by Michael Mabee



Power by Association*



U.S. Investor-Owned Electric Companies
International Members
Associate Members

EEI The Edison Electric Institute, is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members. Organized in 1933, EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums.

U.S. Energy Companies

AES Corporation

Dayton Power & Light Company Indianapolis Power & Light Company

ALLETE

Minnesota Power

Superior Water, Light and Power Company

Alliant Energy Ameren Corporation Ameren Illinois Ameren Missouri American Electric Power

> AEP Ohio **AEP Texas**

Appalachian Power Company Indiana Michigan Company Kentucky Power Company

Public Service Company of Oklahoma Southwestern Electric Power Company

American Transmission Company

AVANGRID

Central Maine Power New York State Electric & Gas Rochester Gas & Electric The United Illuminating Company

Avista Corporation Avista Utilities

Alaska Electric Light and Power Company

Berkshire Hathaway Energy MidAmerican Energy Company

NV Energy PacifiCorp Pacific Power Rocky Mountain Power Black Hills Corporation Black Hills Energy CenterPoint Energy

Vectren

Central Hudson Gas & Electric Corp.

Cleco Corporate Holdings

CMS Energy

Consumers Energy Consolidated Edison

Consolidated Edison Company of New York

Orange and Rockland Utilities Cross Texas Transmission Dominion Energy

DTE Energy Duke Energy

Duquesne Light Company Edison International

Southern California Edison

El Paso Electric

Entergy Corporation

Entergy Arkansas Entergy Louisiana Entergy Mississippi **Entergy New Orleans**

Evergy

Eversource Energy Exelon Corporation Atlantic City Electric

Entergy Texas

BGE ComEd Delmarva Power **PECO** Pepco

FirstEnergy Corp. The Illuminating Company

Jersey Central Power & Light

Met-Ed Mon Power Ohio Edison Penelec Penn Power Potomac Edison Toledo Edison West Penn Power Florida Public Utilities Green Mountain Power Hawaiian Electric Industries

> Hawaiian Electric Company Hawaii Electric Light Company Maui Electric Company

IDACORP Idaho Power ITC Holdings Corp. ITC Great Plains ITC Michigan **ITC Midwest** Liberty Utilities **Empire District** MDU Resources Group

Montana-Dakota Utilities Company

MGE Energy

Madison Gas and Electric Company Mt. Carmel Public Utility Company

National Grid NextEra Energy

Florida Power & Light Company

Gulf Power **NiSource**

Northern Indiana Public Service Company

NorthWestern Energy **OGE Energy Corporation**

Oklahoma Gas & Electric Company

Ohio Valley Electric Corporation

Oncor

Otter Tail Corporation Otter Tail Power Company

PG&E Corporation

Pacific Gas & Electric Company Pinnacle West Capital Corporation Arizona Public Service Company

PNM Resources PNM TNMP

Portland General Electric

PPL Corporation PPL Electric Utilities LG&E and KU Energy

Public Service Enterprise Group

Public Service Electric & Gas Company

PSEG Long Island Puget Sound Energy

San Diego Gas & Electric Company

Sharyland Utilities Southern Company

Alabama Power Company Georgia Power Company Mississippi Power Company Tampa Electric an Emera Company

Tennessee Valley Authority - EEI Strategic Partner

UGI Corporation **UGI** Utilities **Unitil Corporation UNS Energy Corporation** Tucson Electric Power UniSource Energy Services Upper Peninsula Power Company

Vermont Electric Power Company WEC Energy Group We Energies

Wisconsin Public Service

Upper Michigan Energy Resources

Xcel Energy

International Members

AES Corporation

Alectra - Canada Altalink - Canada

APR Energy - United States ATCO Electric - Canada

Bahamas Power and Light - Bahamas

Belize Electricity - Belize

Bermuda Electric Light (BELCO) - Bermuda

Brookfield Renewables - Canada Capital Power Corp. - Canada

China Southern Power Grid Co. - China

Chubu Electric Power - Japan

Compagnie Ivoirienne d'Electricité (CIE) - Ivory

Companhia Energetica de Minas Gerais (CEMIG)

- Brazil EDF - France EDP - Portugal

Electricity Supply Board - Ireland

Emera, Inc. - Canada

Barbados Light & Power - Barbados Dominica Electricity Services Ltd. - Island of Dominica

Nova Scotia Power Inc. - Canada

St. Lucia Electricity Services (LUCELEC) - West

Endeavour Energy - Australia

ENMAX - Canada

Entegrus Powerlines - Canada

Fortis, Inc. - Canada

Caribbean Utilities - Cayman Islands

FortisAlberta - Canada FortisBC Electric - Canada Maritime Electric - Canada

Gulf Cooperation Council Interconnection Authority (GCCIA) - Saudi Arabia Guyana Power and Light - Guyana

Hydro One - Canada Hydro Ottawa - Canada Hydro-Québec - Canada

Iberdrola - Spain Jemena - Australia J-Power - Japan

Kansai Electric Power - Japan

Korea Electric Power (KEPCO) - Korea

Manitoba Hydro - Canada National Grid - United Kingdom

Ontario Power Generation (OPG) - Canada Orion New Zealand Ltd. - New Zealand PGE Polska Grupa Energetyczna S.A. - Poland

Power Assets Holdings - Hong Kong

Powerco Ltd. - New Zealand SaskPower - Canada

St. Vincent Electricity Services (VINLEC) - West

State Grid Corporation of China (SGCC) - China

TasNetworks - Australia Tohoku Electric Power - Japan Tokyo Electric Power (TEPCO) - Japan

Toronto Hydro - Canada

Transpower New Zealand Ltd. - New Zealand

UK Power Networks - United Kingdom Unison Networks Ltd. - New Zealand

Vector Ltd. - New Zealand Wellington Electricity - New Zealand

Associates

Power-Plus Members

Black & Veatch General Electric Guidehouse Oracle PowerPlan Quanta Services

Power Members

Aclara Deloitte ΕY Google Pike Electric Troutman Sanders

Uplight Uptake Urbint

Utilities International

Associate Members

ABB Inc. Accenture

AccuWeather Enterprise Solutions

Aclara

Advanced Microgrid Solutions

Adventech, LLC

AECOM

AEGIS Insurance Services, Inc.

Aggreko

Akin Gump Strauss Hauer & Feld, LLP Allan Briteway Electrical Utility Contractors, Inc.

Alston & Bird LLP

Altec Inc. American Water

American Wholesale Lighting American Wind Energy Association

Ampirical Anixter Inc. Anterix

Aon Global Power **APTIM** ARCOS LLC Ardmore Roderick Asplundh

Atlantica Yield Atwell, LLC AutoGrid Systems

Babcock & Wilcox Company, The

Bain & Company, Inc. Baker Botts L.L.P. Balch & Bingham LLP

Bidgely Black & Veatch

Bosch Security and Safety Systems Boston Consulting Group, The

Bracewell LLP

Bright Investments, LLC Bruce & Merrilees Electric Co

Burns & McDonnell Engineering Co. Inc.

Carmen L Gentile, PLLC

Caterpillar Inc.

CBRE Clarion Securities Chapman and Cutler LLP Charles River Associates Choate, Hall & Stewart LLP

Citi

CohnReznick

Commonwealth Associates, Inc. Concentric Energy Advisors, Inc. Corpfinance International Limited

Crowell & Moring LLP

CS Week

Cupertino Electric, Inc.

CyberCon Power & Utilities Cybersecurity

Conference D&D Power Inc Danella Companies, Inc. Darcy Partners

David Evans and Associates Davis H. Elliot Company, Inc. Davis Wright Tremaine LLP

Day Pitney LLP Deloitte

Disaster Resource Group

Distributed Energy Financial Group DNV GL Energy Services USA Dorsey & Whitney LLP

E Source Eaton Corporation e-Hazard.com EHS Partners, LLC

Electric Conduit Construction Electrical Consultants, Inc. EN Engineering, LLC **Enchanted Rock LLC**

Energy Management Collaborative (EMC)

EnergyHub Inc

Environmental Consultants, Inc.

Ephektiv EQ by Equiniti **Essential Utilities** ESTA International, LLC

EVBox Evercore

Eversheds Sutherland

Faegre Baker Daniels, LLP FDH Infrastructure Services, LLC

Ferreira Power West First Solar, Inc.

Flagger Force Traffic Control Services

Fortress Information Security Frost Brown Todd LLC FTI Consulting, Inc. Gap International General Electric Gibson Dunn & Crutcher

Google

Grid Capital Advisors

Guidehouse

Associate Members (cont'd)

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POWER Engineers, Inc.
PowerAdvocate, Inc.

PowerGrid Services, Collective Storm Response

PowerPlan, Inc.

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Regulated Capital Consultants
Rexel Energy Solutions
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Exhibit C To May 13, 2020 Motion In Docket No. EL20-46-000 Submitted by Michael Mabee



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The Edison Electric Institute, is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members. Organized in 1933, EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums.

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ALLETE

Minnesota Power

Superior Water, Light and Power Company

Alliant Energy
Ameren Corporation
Ameren Illinois
Ameren Missouri
American Electric Power

AEP Ohio AEP Texas

Appalachian Power Company Indiana Michigan Company Kentucky Power Company

Public Service Company of Oklahoma Southwestern Electric Power Company

American Transmission Company

AVANGRID

Central Maine Power New York State Electric & Gas Rochester Gas & Electric The United Illuminating Company

Avista Corporation Avista Utilities

Alaska Electric Light and Power Company

Berkshire Hathaway Energy MidAmerican Energy Company

NV Energy PacifiCorp Pacific Power Rocky Mountain Power Black Hills Corporation

Black Hills Energy CenterPoint Energy

Central Hudson Gas & Electric Corp.

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Consumers Energy
Consolidated Edison

Cleco Power

Consolidated Edison Company of New York

Orange and Rockland Utilities Rockland Electric Company Cross Texas Transmission

Dominion Energy

Dominion Energy Virginia Dominion Energy North Carolina South Carolina Electric & Gas

DTE Energy Duke Energy

Duquesne Light Company

Edison International

Southern California Edison

El Paso Electric
Entergy Corporation
Entergy Arkansas
Entergy Louisiana
Entergy Mississippi
Entergy New Orleans
Entergy Texas

verav

Kansas City Power & Light Company

Westar Energy Eversource Energy Exelon Corporation Atlantic City Electric

Baltimore Gas and Electric Company

ComEd Delmarva Power PECO

Pepco FirstEnergy Corp.

Met-Ed

The Illuminating Company
Jersey Central Power & Light

Mon Power
Ohio Edison
Penelec
Penn Power
Potomac Edison
Toledo Edison
West Penn Power
Florida Public Utilities
Green Mountain Power
Hawaiian Electric Industries
Hawaiian Electric Company
Hawaii Electric Light Company
Maui Electric Company

Idaho Power
ITC Holdings Corp.
ITC Great Plains
ITC Michigan
ITC Midwest
Liberty Utilities
Empire District
MDU Resources Group

IDACORP

Montana-Dakota Utilities Company

MGE Energy

Madison Gas and Electric Company Mt. Carmel Public Utility Company

National Grid NextEra Energy

Florida Power & Light Company

Gulf Power

NiSource

Northern Indiana Public Service Company

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Oklahoma Gas & Electric Company
Ohio Valley Electric Corporation

Oncor

Otter Tail Corporation
Otter Tail Power Company

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Pacific Gas & Electric Company Pinnacle West Capital Corporation Arizona Public Service Company

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WEC Energy Group
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Altalink - Canada

APR Energy - United States ATCO Electric - Canada

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Bermuda Electric Light (BELCO) - Bermuda

Brookfield Renewables - Canada Capital Power Corp. - Canada

CEMIG - Brazil CESC Ltd. - India

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Chubu Electric Power - Japan

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Compagnie Ivoirienne d'Electricité (CIE) - Ivory

Coast

EDF - France

EDP - Portugal

EGE Haina - Dominican Republic

Emera, Inc. - Canada

Barbados Light & Power - Barbados Nova Scotia Power Inc. - Canada

Dominica Electricity Services Ltd. - Island of

Dominica

St. Lucia Electricity Services (LUCELEC) - West

Energy Queensland - Australia

ENMAX - Canada

Entegrus Powerlines - Canada

ESB - Ireland

Fortis, Inc. - Canada

Caribbean Utilities - Cayman Islands

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J-Power - Japan Jemena - Australia

Kansai Electric Power - Japan

Korea Electric Power (KEPCO) - Korea

National Grid - United Kingdom

Ontario Power Generation (OPG) - Canada Orion New Zealand Ltd. - New Zealand

Power Assets Holdings - Hong Kong

Powerco Ltd. - New Zealand SA Power Networks - Australia

SaskPower - Canada

St. Lucia Electricity Services (LUCELEC) - West Indies

St. Vincent Electricity Services (VINLEC) - West Indies

State Grid Corporation of China (SGCC) - China

TasNetworks - Australia
Tohoku Electric Power - Japan

Tokyo Electric Power (TEPCO) - Japan

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MOSAIC Motive Power Inc.

Munger, Tolles & Olson LLP

MYR Group Inc

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Novar Novinium

Nuclear Electric Insurance Limited

Oliver Wyman

OMICRON electronics Corp. USA

Oracle Corporation
Orbital Engineering
Osborn Maledon P.A.

Osmose Utilities Services, Inc.

Pace Global

Parker Poe Adams & Bernstein, LLP Peak Load Management Alliance Pegasus Global Holdings, Inc.

Perkins Coie LLP Pike Electric, LLC Pike Engineering, LLC

Pillsbury Winthrop Shaw Pittman LLP

PLH Group, Inc.
POWER Engineers, Inc.

PowerAdvocate, Inc.

PowerGrid Services, Collective Storm Response

PowerPlan, Inc.
Preng & Associates
PricewaterhouseCoopers LLP

Quanta Services
Quarles & Brady LLP

Recurrent Energy Reed Smith LLP

Regulated Capital Consultants RHR International LLP

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S&C Electric Company Sagewell, Inc. Sargent & Lundy, LLC Saulsbury Industries

Saulsbury Industries
Schiff Hardin LLP
Schneider Electric

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Scott Madden, Inc.

Sensus

Sharper Shape Inc Shelton Group Sidley Austin LLP Siemens Energy, Inc.

Skadden, Arps, Slate, Meagher & Flom LLP

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Stantec Consulting Services, Inc. Stem, Inc.

Stikeman Elliott LLP

Steptoe & Johnson, LLP

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Tendril
Terracon
The Desoto Group
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The Faraday Grid
Transventure Energy
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Troutman Sanders LLP

Ulteig

United States Energy Association

Uptake Utegration

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Utilities International, Inc.
Van Ness Feldman, LLP
Veteran Power, Inc.
Vinson & Elkins LLP

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Water Integrated Treatment Systems, LLC

West Monroe Partners White & Case LLP Wilson Construction Co Winston & Strawn LLP Witt OBriens LLC

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Exhibit D To May 13, 2020 Motion In Docket No. EL20-46-000 Submitted by Michael Mabee



Power by Association*



U.S. Investor-Owned Electric Companies
International Members
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EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for 220 million Americans, operate in all 50 states and the District of Columbia, and directly employ more than 500,000 workers. With more than \$90 billion in annual capital expenditures, the electric power industry is responsible for millions of additional jobs. Reliable, affordable, and sustainable electricity powers the economy and enhances the lives of all Americans. Organized in 1933, EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums.

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Dayton Power & Light Company Indianapolis Power & Light Company

ALLETE

Minnesota Power

Superior Water, Light and Power Company

Alliant Energy Corporation

Ameren Corporation

Ameren Illinois

Ameren Missouri

American Electric Power

AFP Ohio

AEP Texas

Appalachian Power

Indiana Michigan Power

Kentucky Power

Public Service Company of Oklahoma

Southwestern Electric Power Company

American Transmission Company

AVANGRID

Central Maine Power Company

New York State Electric & Gas Corporation

Rochester Gas & Electric Corporation

The United Illuminating Company

Avista Corporation Avista Utilities

Alaska Electric Light and Power Company

Berkshire Hathaway Energy

MidAmerican Energy Company

NV Energy

PacifiCorp

Pacific Power

Rocky Mountain Power

Black Hills Corporation

Black Hills Energy

CenterPoint Energy

Central Hudson Gas & Electric Corporation

Cleco Corporation

Cleco Power

CMS Energy Corporation

Consumers Energy

Consolidated Edison

Consolidated Edison Company of New York

Orange and Rockland Utilities

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Rockland Electric Company

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Dominion

Dominion Virginia Power

Dominion North Carolina Power

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Duke Energy Corporation

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Duquesne Light Company

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Southern California Edison

El Paso Electric Company

Emera Maine

Empire District Electric Company

Energy Future Holdings Corporation

Oncor

Entergy Corporation

Entergy Arkansas

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Entergy Mississippi

Entergy New Orleans

Entergy Texas

Eversource Energy

Exelon Corporation

Baltimore Gas & Electric Company

Commonwealth Edison Company

PECO Energy Company

FirstEnergy Corporation

The Illuminating Company

Jersey Central Power & Light

Met-Ed Mon Power

Ohio Edison

Penelec

Penn Power Potomac Edison

Toledo Edison

West Penn Power

Florida Public Utilities Company

Great Plains Energy

Kansas City Power & Light Company

Green Mountain Power Corporation

Hawaiian Electric Industries

Hawaiian Electric Company

Hawaii Electric Light Company

Maui Electric Company

IDACORP

Idaho Power Company

InfraREIT

ITC Holdings Corporation

ITC Great Plains

ITC Michigan

ITC Midwest

Liberty Utilities

MDU Resources Group

Montana-Dakota Utilities Company

MGE Energy

Madison Gas and Electric Company

Mt. Carmel Public Utility Company

National Grid

NextEra Energy

Florida Power & Light Company

NiSource

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NorthWestern Energy

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Otter Tail Corporation

Otter Tail Power Company

Pepco Holdings

Pepco

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PG&E Corporation

Pacific Gas & Electric Company

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Arizona Public Service Company

PNM Resources

PNM

TNMP

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Bahamas Electricity Corporation - Bahamas

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Brookfield Renewable Power Inc. (formerly

Brascan Power) - Canada

Calcutta Electric Supply Corporation - India

Capital Power Corporation - Canada

Caribbean Utilities Company, Ltd. - Cayman

Islands, British West Indies

CEMIG - Brazil

Chubu Electric Power Co., Inc. - Japan

Comisión Federal de Electricidad (CFE) - Mexico

EDF, S.A.. - France

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Energias de Portugal (EdP) - Portugal

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Entegrus Powerlines

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Irbid District Electricity Company - Jordan

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KPMG LLP

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MasTec Transmission - Substation Group

Matrix NAC

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Merjent Inc.

Michael Best & Friedrich LLP

Michels Corporation
Microsoft Corporation

Midwest Energy Efficiency Alliance Milbank, Tweed, Hadley & McCloy LLP

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Pike Corporation

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PLH Group, Inc.

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Exhibit E To May 13, 2020 Motion In Docket No. EL20-46-000 Submitted by Michael Mabee



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STATE GRID CORPORATION OF CHINA WINS EEI'S 2018 INTERNATIONAL EDISON AWARD

SAN DIEGO (June 6, 2018) - State Grid Corporation of China (SGCC) today received the Edison Electric Institute's (EEI's) 2018 International Edison Award, the U.S. electric power industry's most prestigious honor. A panel of former energy company chief executives selected SGCC for the annual award from a group of distinguished finalists.

A robust, integrated, and flexible charging network is essential for electric vehicle (EV) growth and deployment in China. SGCC developed the Smart Internet of Vehicles EV Charging Network, which allows the company to expand its EV capacity. In the process, SGCC overcame significant barriers to success, including a lack of standards for manufacturers, to build the largest EV charging network in the world.

"State Grid Corporation of China's exemplary effort to build smarter energy infrastructure that supports the expansion of electric vehicles demonstrates our industry's commitment to customers and to accelerating transportation electrification throughout the world," said EEI President Tom Kuhn. "The reduction of transportation pollution is a global challenge, and the electric power industry is taking significant steps to reduce greenhouse gas emissions throughout the world by building the charging infrastructure that is needed to advance electric vehicle

SGCC has established, maintained, and continuously expanded the world's largest EV charging network and EV service platform. It has constructed 6,286 stations (last updated April 2018) and 56,000 charging piles throughout China. The "9 East-West Highways, 9 North-South Highways, 2 Beltways" covers almost 20,000 miles (last updated April 2018) of distance in more than 150 cities. The EV charging platform also has enabled access of 183,000 charging pile (last updated April 2018) from other service operators, which effectively promotes the reliability of EV charging as well as the development of the EV industry in China.

"Congratulations to the SGCC team for winning the 2018 International Edison Award," said Kuhn.

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EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for more than 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies, with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

Exhibit F To May 13, 2020 Motion In Docket No. EL20-46-000 Submitted by Michael Mabee



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SGCC wins the 2018 International Edison Award

Updated: 2018-06-07

The Edison Electric Institute, an association representing all the investor-owned electric companies in the United States, recently announced that State Grid Corporation of China (SGCC) won the 2018 International Edison Award for its exemplary effort of building a smart energy infrastructure that supports the expansion of the electric vehicle industry.



State Grid Corporation of China (SGCC) wins the 2018 International Edison Award on June 6. [Photo/sasac.gov.cn]

State Grid is the first Chinese company in the sector to receive the most prestigious honor in the US electric power industry.

It has developed a Smart Internet of Electric Vehicles Charging Network, the largest EV charging network in the world, which reflects SGCC's development goal of becoming a top world energy internet company, and also showcases the company's growing international influence.

As of April, the company had established 6,286 charging stations and 56,000 charging piles throughout China. The plan of "9 East-West Highways, 9 North-South Highways, 2 Beltways" covers almost 31,000 kilometers of distance in more than 150 cities. The EV charging platform also has enabled access of 183,000 charging piles from other service operators, which effectively promotes the development of China's EV industry.



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CEC signed MOU with EEI

On June 3, 2016, Mr. Liu Zhenya, President of China Electricity Council(CEC), met Mr. Thomas R. Kuhn, President of Edison Electric Institute (EEI)in Beijing. CEC and EEI signed a memorandum of understanding (MOU) to deepen cooperative partnership and promote mutual development between the two organizations and their member companies.

President Liu Zhenya reviewed recent discussions between the two organizations and vowed to cooperate with EEI to serve as a bridge between power industries of both countries. President Kuhn further introduced recent activities and future plans of EEI, and agreed on the positive role of the two associations in the future Sino-US power industry cooperation. EEI Vice President of International Programs Lawrence Jones and CEC Executive Vice President Yang Kun signed the MOU.

EEI is an industry association for power sector of the US with domestic members of power utilities and international members across Europe and Asia.

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EEI AND CHINA ELECTRICITY COUNCIL SIGN MOU

In early June, EEI and the China Electricity Council (CEC) signed a memorandum of understanding (MOU) to deepen cooperative partnership and promote mutual development between the two organizations and their member companies. EEI President Tom Kuhn and CEC President Liu Zhenya, who is also the former Chairman of State Grid Corporation of China (SGCC), attended the signing ceremony held June 3 in Beijing. SGCC is an International Member of the Institute.

EEI Vice President of International Programs Lawrence Jones and CEC Executive Vice President Yang Kun signed the MOU, which will serve as a strong foundation for deeper cooperation in the areas of innovation, clean energy,

Founded in 1988, CEC is a joint organization of China's power enterprises and institutions with 939 members engaged in all aspect of the power industry, including power generation, transmission, distribution, engineering, construction, and R&D.

