

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Rate Recovery, Reporting, and Accounting)	
Treatment of Industry Association Dues)	
And Certain Civic, Political, and Related Expenses)	Docket No. RM22-5-000

Motion to Intervene and Comments of Michael Mabee

Submitted to FERC on January 18, 2022

I commend the Commission for opening this docket on this important issue.

I am a private citizen who conducts public interest research on the security of the electric grid. I investigate and report on grid security issues, as well as the lack of transparency in the current regulatory regime. I have been quoted by the Wall Street Journal, the Washington Post and other publications on grid security and have intervened and submitted testimony to the Commission, other executive branch agencies as well as Congress.

I move to intervene because I am an electric utility ratepayer and my interests are not represented by the electric utility industry. The electric utility industry is using money ratepayers pay each month for activities where “Rate Recovery” should not be allowed.

2.3 billion reasons for this rate recovery docket.

According to the Center for Responsive Politics, since the Great Northeast Blackout of 2003, the electric utility industry has spent an average of \$124 million per year lobbying the U.S. Congress.¹ In total since 2003, they have spent almost **\$2.3 billion** lobbying the U.S. Congress alone. The electric utility industry also spent \$231 million in political “contributions” to candidates for federal office during the same period.²

Also, since 2003 the electric utility industry has made “contributions” to members of the U.S. House and U.S Senate averaging \$22.8 million per election cycle (or approximately \$11.4 million per year). In the 2020 election cycle, the industry made \$28.5 million in political “contributions” to members of Congress. And many of the recipients of these “contributions” serve on committees with responsibility for electric grid regulation and security.³

Exhibit A lists “contributions” to members of Congress, by recipient, from the electric utility industry in the 2020 election cycle. Exhibit B lists lobbying amounts, by entity, in the electric utility industry in 2021. Exhibit C contains two charts showing the lobbying and contributions by the electric utility industry since

¹ See: <https://www.opensecrets.org/industries/lobbying.php?cycle=2018&ind=E08>

² See: <https://www.opensecrets.org/industries/totals.php?cycle=2020&ind=E08>

³ See: <https://www.opensecrets.org/industries/recips.php?cycle=2020&ind=E08>

the great Northeast Blackout of 2003 – the event that resulted in Congress adding Section 215 to the Federal Power Act in the Energy Policy Act of 2005. This created the present self-regulatory system which is overseen by the Federal Energy Regulatory Commission (FERC).

Notably, the above summation and the Exhibits *do not include* the substantial “lobbying” and “contributions” at the state level.

The Commission should not allow rate recovery for any lobbying or political “contributions.” This means that industry association dues should not be eligible for rate recovery since this is where the trade associations get their funding for lobbying and political “contributions.”

Moreover, there are several other subjects on rate recovery that the Commission should consider to protect the public interest.

Lobbying and political contributions by electric utility entities

Exhibit B shows that in addition to Industry Trade Associations, such as Edison Electric Institute, individual entities, such as PG&E Corporation, do their own lobbying and political contributing – funded by ratepayers. So, let’s take a look at PG&E Corporation for example.

Ratepayers of PG&E Corporation funded:⁴

- \$1,282,400 in political contributions to federal candidates made by PG&E itself.
- \$2,700,000 in federal lobbying by PG&E itself.
- Industry Association dues to Edison Electric Institute who spent:
 - \$6,871,491 in federal lobbying
 - \$787,637 in federal political contributions

The industry’s interests are often not aligned with ratepayers’ interests. In fact, the interests are often opposed. Therefore, none of this should be eligible for rate recovery.

Ratepayers fund secret penalties

Another unjust, unreasonable and unduly discriminatory rate recovery matter arises in 295 Notice of Penalty dockets at FERC involving over 1,500 regulatory violators of “Critical Infrastructure Protection” (CIP) standards. In these cases, companies have been charged with violating CIP standards. However, the names of all the violators have been permanently withheld from the public as demanded by electric utility trade associations, the North American Electric Reliability Corporation (NERC) and individual utility companies. The Commission has allowed this coverup to continue since 2010, allowing the electric utility industry to avoid public scrutiny and accountability.

⁴ According to PG&E’s latest Form 10-K Annual Report filed with the Securities and Exchange Commission on February 25, 2021: “PG&E Corporation, incorporated in California in 1995, is a holding company whose primary operating subsidiary is Pacific Gas and Electric Company, a public utility operating in northern and central California. The Utility was incorporated in California in 1905. PG&E Corporation became the holding company of the Utility and its subsidiaries in 1997. **The Utility generates revenues mainly through the sale and delivery of electricity and natural gas to customers.**” [Emphasis added.]

But worse, ratepayers have to foot the bill for the utilities' CIP violation penalties. In other words, ratepayers are kept in the dark about whether the utility they pay and depend on is obeying the CIP standards, but are forced to unknowingly pay the utility's regulatory penalties. This is repugnant to the public interest.

Here are some examples:

If you are a resident of 15 midwestern states including Arkansas, Indiana, Illinois, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Dakota, South Dakota, Texas, Wisconsin and Manitoba (Canada), you got swindled. Here's how:

On December 22, 2010 NERC filed a Notice of Penalty in Docket No. NP11-59-000 against an "Unidentified Registered Entity" (the industry euphemism for a CIP violator whose identity the industry is withholding from the public).⁵ The Notice of Penalty found that the "Unidentified Registered Entity" had violated a cybersecurity standard, CIP-004-1, and was assessed a \$7,000 penalty.

It is bad enough that the residents of the above 15 states (and a province of Canada) would have had no idea that the entity involved impacts them due to the coverup of the identity. But it gets worse when you see what happens next.

The Federal Register on Tuesday February 8, 2011 consisted of 417 pages.⁶ Somehow, if you are a resident of the above 15 states, you should have noticed this entry on page 6776:

*Docket Numbers: ER11-2798-000.
Applicants: Unidentified Registered
Entity.
Description: Request for Recovery of
Charges of Unidentified Registered
Entity.
Filed Date: 01/31/2011.
Accession Number: 20110131-4001.
Comment Date: 5 p.m. Eastern Time
on Tuesday, February 22, 2011.*

You'll first notice that it is a completely different docket number: ER11-2798-000. The second thing you will notice is there is no indication of the violator's identity or geographic area. There is no possible way for the public to know if they are impacted.

Buried deep in this obscure docket in FERC's complex and bureaucratic system, an entity called Midwest Independent Transmission System Operator, Inc. (now known as Midcontinent Independent System Operator, Inc. or "MISO") applied to FERC to pass the \$7,000 penalty from the Notice of Penalty in NP11-59-000 on to its customers.

⁵ See: https://elibrary.ferc.gov/eLibrary/filelist?document_id=13875725&optimized=false

⁶ See: <https://www.govinfo.gov/content/pkg/FR-2011-02-08/pdf/FR-2011-02-08.pdf>

FERC approved the application⁷ and thus, customers in 15 states and a province of Canada were victimized on May 6, 2011. The violator successfully passed their violation penalty to its unknowing customers.

This abhorrent situation was best summed up in a filing by Norris Electric Cooperative⁸ in Illinois:

“NERC fined MISO a. penalty of \$7,000. That is a small penalty and its payment would typically have little impact on an entity the size of MISO if MISO was not a not-for-profit. Due to the not-for-profit status, when NERC penalized MISO, they did not really penalize MISO, they penalized the members of MISO who have no governing control over MISO. A penalty should have the same result as disciplining a child. You spank them in hopes they do not repeat the offense. This penalty has no affect on MISO since the origin of the penalty dollars will come from the unwilling market participants. In our case it will be passed on to our own residential and commercial members. So, in my opinion, the penalty will have no affect on future behavior!

In this process, MISO is paying a law firm, Hunton & Williams, to file for the ability to recover the penalty from the MISO members. The cost of the law firm probably exceeds the cost of the penalty. When you couple that with MISO’s approved budget containing line items for attorney fees, it appears to me that it would be a far better use of the line budget item to pay the penalty!”

Kudos to Norris Electric Cooperative for standing up for their customers. We have occasionally seen heroes among the state agencies and some electric industry companies who believe that the system needs more transparency and that the public has a right to know.⁹

Unfortunately, this was not an isolated incident. I have found several FERC orders in which the CIP violation penalties were approved to be passed on to the unsuspecting customers:

- FERC Docket ER11-2798-000¹⁰
- FERC Docket ER12-1112-000¹¹
- FERC Docket ER15-764-000¹²
- FERC Docket ER19-2362-000¹³

In each instance, the identity of the violator was withheld from the public when the Notice of Penalty was issued. In each instance, a separate docket was opened with an obscure “public notice” in the Federal Register which, in all four cases, did not give the public adequate information to determine if they were impacted. And in each case, FERC approved the penalty being passed on to the public.

⁷ See: 135 FERC ¶ 61,118, issued May 6, 2011.

⁸ See: https://elibrary.ferc.gov/eLibrary/filelist?document_id=13929694&optimized=false

⁹ Several examples, such as the New Mexico Public Regulation Commission, the Louisiana Public Service Commission and multiple elected and appointed officials in New Hampshire can be found Here: <https://michaelmabee.info/multiple-states-to-ferc-the-public-has-a-right-to-know/>

¹⁰ See: 135 FERC ¶ 61,118, issued May 6, 2011.

¹¹ See: 139 FERC ¶ 61,038, issued April 16, 2012

¹² See Letter Order, dated February 27, 2015.

https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20150227-3065&optimized=false

¹³ See Letter Order, dated August 27, 2019.

https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190827-3028&optimized=false

There are likely many more. These are difficult to find and took a bit of “docket archeology” to root these examples out. Unfortunately, without access to the names of the violators, the public has no hope of seeing how many times FERC has approved secret violation penalties being passed on to the electric customers. In fact, these instances are all not-for-profit companies. In the case of a for profit company, the utility doesn’t even have to ask. They just decide themselves whether the ratepayers or the shareholders eat the penalties. The CEOs are certainly not going to eat them.

Let me give you an example of a for profit company: PG&E Corporation (NYSE: PCG).

PG&E endangered the grid – who paid for it?

On February 28, 2018, NERC filed a Notice of Penalty with FERC in Docket Number NP18-7-000 against an “Unidentified Registered Entity” for cybersecurity violations. The Notice of Penalty assessed a \$2.7 million dollar fine. I filed a Freedom of Information Act request for the name of the entity. After a great deal of effort, I was able to determine that the “Unidentified Registered Entity” was PG&E Corporation and this was reported in the Wall Street Journal.¹⁴

In addition to the \$2.7 million dollar penalty, PG&E presumably also had to spend an unknown amount (but likely a substantial amount) of money on mitigating the vulnerability created by their cyber security violations. Somebody had to pay for all of this. Because I could find no disclosure of the event or its costs in PG&E’s filings with the Securities and Exchange Commission, it is impossible for the public to know whether the shareholders or the ratepayers ate these costs—I am sure both groups would like to know.

- Does it make a difference in who should pay if a company is a repeat CIP violator? (Which PG&E is.)¹⁵
- Does it make a difference in who should pay if the company is negligent? (Which PG&E was.)¹⁶

One thing is for sure: PG&E’s then CEO Geisha Williams didn’t suffer. In 2018 she was paid \$9.3 million¹⁷ – an increase from the previous year. In fact, for a chart on just how obscene PG&E’s executive compensation was for the time period when this CIP violation occurred, one need to look no further than page 74 of PG&E’s 2019 Proxy Statement filed with the SEC.¹⁸ No, the PG&E executives didn’t suffer.

The *last* one who should be deciding who pays *is the regulatory violator*. This decision should be made by the appropriate regulator (FERC or the PUC) with full transparency to the two possible victims: the ratepayers and the shareholders.

¹⁴ Smith, Rebecca. Wall Street Journal. “PG&E Identified as Utility That Lost Control of Confidential Information.” August 24, 2018. <https://www.wsj.com/articles/pg-e-identified-as-utility-that-lost-control-of-confidential-information-1535145850>

¹⁵ Smith, Rebecca. Wall Street Journal. “PG&E Among Utilities Cited for Failing to Protect Against Cyber and Physical Attacks.” April 9, 2019. <https://www.wsj.com/articles/pg-e-among-utilities-cited-for-failing-to-protect-against-cyber-and-physical-attacks-11554821337>

¹⁶ See: <https://michaelmabee.info/pge-endangered-the-grid/>

¹⁷ Avalos, George. Bay Area News Group. “Former PG&E CEO got pay increases, stock sale windfalls, during years of lethal wildfires.” April 26, 2019. <https://www.mercurynews.com/2019/04/26/former-pge-ceo-got-pay-increases-stock-sale-windfalls-during-years-of-lethal-wildfires/>

¹⁸ Available at: https://www.sec.gov/Archives/edgar/data/0001004980/000130817919000192/lpcg2019_pre14a.htm

But this is not how the system presently works.

Lack of transparency makes rate recovery unfair to the public

In sum, ratepayers should not be forced to pay for the electric utility industry's political agenda, which is not always aligned with the public interest. Moreover, by passing the costs of penalties on to the ratepayers, the utilities lose incentive to follow mandatory standards and the public is unknowingly harmed for corporate misbehavior that in many instances is not transparent to the public in their first place.

Therefore, I recommend that the Commission consider adopting the following policies:

1. No funds used for lobbying or political contributions should be eligible for rate recovery. This means that industry association dues should not be recoverable. Moreover, no funds used for lobbying or political contributions by an individual utility should be eligible for rate recovery.
2. Utilities should not be allowed to recover penalty amounts for violations of any mandatory reliability standards and this must be made crystal clear to the regulated industry.

Respectfully submitted,



Michael Mabee

Exhibit A – Contributions to Members of Congress by the Electric Utility Industry

Exhibit B – Congressional Lobbying and Contributions by the Electric Utility Industry

Exhibit C – Total Yearly Contributions & Lobbying to Congress by the Electric Utility Industry

Exhibit A

Motion to Intervene and Comments of Michael Mabee

In Docket No. RM22-5-000

Information for 2020 election cycle from OpenSecrets.org (as of January 2, 2022)

All Senators

Candidate	Amount
Sanders, Bernie (I-VT)	\$356,418
Perdue, David (R-GA)	\$300,491
McConnell, Mitch (R-KY)	\$237,606
Loeffler, Kelly (R-GA)	\$210,677
Peters, Gary (D-MI)	\$189,409
Gardner, Cory (R-CO)	\$188,582
Ossoff, Jon (D-GA)	\$167,790
McSally, Martha (R-AZ)	\$157,995
Cornyn, John (R-TX)	\$146,828
Warnock, Raphael (D-GA)	\$146,756
Graham, Lindsey (R-SC)	\$144,502
Daines, Steven (R-MT)	\$144,167
Capito, Shelley Moore (R-WV)	\$138,865

Candidate	Amount
Warren, Elizabeth (D-MA)	\$133,079
Ernst, Joni (R-IA)	\$128,577
Kelly, Mark (D-AZ)	\$117,906
Risch, James E (R-ID)	\$104,895
Tillis, Thom (R-NC)	\$101,151
Inhofe, James M (R-OK)	\$99,945
Murkowski, Lisa (R-AK)	\$96,500
Warner, Mark (D-VA)	\$80,717
Collins, Susan M (R-ME)	\$78,399
Rounds, Mike (R-SD)	\$66,785
Sullivan, Dan (R-AK)	\$66,461
Smith, Tina (D-MN)	\$64,307
Jones, Doug (D-AL)	\$63,287
Sinema, Kyrsten (D-AZ)	\$61,445

Candidate	Amount
Shaheen, Jeanne (D-NH)	\$59,863
Booker, Cory (D-NJ)	\$58,967
Lujan, Ben Ray (D-NM)	\$56,883
Marshall, Roger (R-KS)	\$55,295
Klobuchar, Amy (D-MN)	\$54,220
Cassidy, Bill (R-LA)	\$52,045
Barrasso, John A (R-WY)	\$47,115
Manchin, Joe (D-WV)	\$45,600
Portman, Rob (R-OH)	\$44,654
Hagerty, Bill (R-TN)	\$42,085
Harris, Kamala (D-CA)	\$41,592
Toomey, Pat (R-PA)	\$39,860
Sasse, Ben (R-NE)	\$39,738
Coons, Chris (D-DE)	\$39,418

Candidate	Amount
Wyden, Ron (D-OR)	\$38,264
Hickenlooper, John (D-CO)	\$36,993
Hyde-Smith, Cindy (R-MS)	\$36,797
Durbin, Dick (D-IL)	\$35,625
Lummis, Cynthia (R-WY)	\$34,618
Wicker, Roger (R-MS)	\$33,005
Scott, Tim (R-SC)	\$32,790
Carper, Tom (D-DE)	\$32,083
Menendez, Robert (D-NJ)	\$31,140
Fischer, Deb (R-NE)	\$29,178
Duckworth, Tammy (D-IL)	\$28,075
Thune, John (R-SD)	\$24,105
Schumer, Charles E (D-NY)	\$23,976
Stabenow, Debbie (D-MI)	\$23,439

Candidate	Amount
Young, Todd (R-IN)	\$20,483
Heinrich, Martin (D-NM)	\$19,050
Reed, Jack (D-RI)	\$18,000
Lankford, James (R-OK)	\$16,020
Kennedy, John (R-LA)	\$15,783
Schatz, Brian (D-HI)	\$15,085
Tuberville, Tommy (R-AL)	\$14,870
Rubio, Marco (R-FL)	\$14,603
Moran, Jerry (R-KS)	\$14,000
Hawley, Josh (R-MO)	\$13,870
Padilla, Alex (D-CA)	\$13,750
Cruz, Ted (R-TX)	\$13,700
Scott, Rick (R-FL)	\$13,695
Brown, Sherrod (D-OH)	\$13,577

Candidate	Amount
Crapo, Mike (R-ID)	\$13,500
Cramer, Kevin (R-ND)	\$13,255
Burr, Richard (R-NC)	\$12,000
Grassley, Chuck (R-IA)	\$11,680
Blunt, Roy (R-MO)	\$11,183
Cotton, Tom (R-AR)	\$10,824
Murray, Patty (D-WA)	\$10,627
Blumenthal, Richard (D-CT)	\$10,206
Hoeven, John (R-ND)	\$10,000
Masto, Catherine Cortez (D-NV)	\$9,980
Merkley, Jeff (D-OR)	\$9,674
Baldwin, Tammy (D-WI)	\$9,101
Blackburn, Marsha (R-TN)	\$9,095
Hirono, Mazie K (D-HI)	\$8,745

Candidate	Amount
Casey, Bob (D-PA)	\$8,345
Romney, Mitt (R-UT)	\$7,575
Boozman, John (R-AR)	\$7,500
Rosen, Jacky (D-NV)	\$7,363
Tester, Jon (D-MT)	\$7,075
Enzi, Mike (R-WY)	\$6,000
King, Angus (I-ME)	\$6,000
Van Hollen, Chris (D-MD)	\$5,505
Hassan, Maggie (D-NH)	\$3,867
Johnson, Ron (R-WI)	\$3,565
Gillibrand, Kirsten (D-NY)	\$3,540
Markey, Ed (D-MA)	\$2,140
Kaine, Tim (D-VA)	\$2,093
Braun, Mike (R-IN)	\$1,555

Candidate	Amount
Paul, Rand (R-KY)	\$1,103
Cantwell, Maria (D-WA)	\$1,020
Isakson, Johnny (R-GA)	\$1,000
Murphy, Christopher S (D-CT)	\$617
Leahy, Patrick (D-VT)	\$33

All Members of the House

Candidate	Amount
McCarthy, Kevin (R-CA)	\$272,493
Hoyer, Steny H (D-MD)	\$220,750
Neal, Richard E (D-MA)	\$201,750
Pallone, Frank Jr (D-NJ)	\$177,500
Upton, Fred (R-MI)	\$157,007
Scalise, Steve (R-LA)	\$142,981
Tonko, Paul (D-NY)	\$141,861
Clyburn, James E (D-SC)	\$130,927
Bustos, Cheri (D-IL)	\$110,447
Walberg, Tim (R-MI)	\$106,275
Johnson, Bill (R-OH)	\$100,741
Rodgers, Cathy McMorris (R-WA)	\$91,976
Reed, Tom (R-NY)	\$91,831
Simpson, Mike (R-ID)	\$89,850

Candidate	Amount
Pelosi, Nancy (D-CA)	\$89,154
Stivers, Steve (R-OH)	\$88,700
Doyle, Mike (D-PA)	\$86,500
Nunes, Devin (R-CA)	\$84,979
Rush, Bobby L (D-IL)	\$83,501
Latta, Bob (R-OH)	\$83,256
Kinzinger, Adam (R-IL)	\$82,461
Wagner, Ann (R-MO)	\$80,705
Brady, Kevin (R-TX)	\$80,000
Dingell, Debbie (D-MI)	\$78,850
Davis, Rodney (R-IL)	\$78,735
Cheney, Liz (R-WY)	\$77,748
Arrington, Jodey (R-TX)	\$76,000
McNerney, Jerry (D-CA)	\$74,950

Candidate	Amount
Peters, Scott (D-CA)	\$72,755
Hudson, Richard (R-NC)	\$71,556
Kind, Ron (D-WI)	\$71,235
LaHood, Darin (R-IL)	\$68,925
Walden, Greg (R-OR)	\$67,500
Gottheimer, Josh (D-NJ)	\$67,185
Katko, John (R-NY)	\$66,053
Graves, Sam (R-MO)	\$63,500
O'Halleran, Tom (D-AZ)	\$63,028
Kildee, Dan (D-MI)	\$62,885
Richmond, Cedric (D-LA)	\$60,025
Kaptur, Marcy (D-OH)	\$60,000
Thompson, Mike (D-CA)	\$59,463
Bacon, Donald John (R-NE)	\$59,455

Candidate	Amount
Mullin, Markwayne (R-OK)	\$59,000
Schrader, Kurt (D-OR)	\$58,585
Buchanan, Vernon (R-FL)	\$58,350
Kelly, Robin (D-IL)	\$57,751
Duncan, Jeff (R-SC)	\$57,600
Cole, Tom (R-OK)	\$57,500
Veasey, Marc (D-TX)	\$57,000
Thompson, Bennie G (D-MS)	\$56,750
Norcross, Don (D-NJ)	\$56,625
Shimkus, John (R-IL)	\$56,500
Costa, Jim (D-CA)	\$54,000
Cardenas, Tony (D-CA)	\$53,005
Graves, Garret (R-LA)	\$52,000
Fitzpatrick, Brian (R-PA)	\$51,238

Candidate	Amount
Fletcher, Lizzie (D-TX)	\$51,188
Rice, Tom (R-SC)	\$49,500
Crenshaw, Dan (R-TX)	\$49,007
Wilson, Joe (R-SC)	\$48,910
Fleischmann, Chuck (R-TN)	\$48,650
Rose, Max (D-NY)	\$47,760
Bergman, John (R-MI)	\$47,378
Balderson, Troy (R-OH)	\$47,006
Joyce, David P (R-OH)	\$46,986
Gabbard, Tulsi (D)	\$46,749
Long, Billy (R-MO)	\$46,500
McEachin, Donald (D-VA)	\$45,750
Griffith, Morgan (R-VA)	\$44,750
Perry, Scott (R-PA)	\$44,695

Candidate	Amount
Kelly, Mike (R-PA)	\$44,550
McKinley, David (R-WV)	\$44,050
Stefanik, Elise (R-NY)	\$43,795
Luetkemeyer, Blaine (R-MO)	\$43,500
Panetta, Jimmy (D-CA)	\$43,350
Gallagher, Mike (R-WI)	\$43,275
Johnson, Dusty (R-SD)	\$42,060
Smith, Jason (R-MO)	\$41,515
Butterfield, G K (D-NC)	\$40,750
Gonzalez, Anthony (R-OH)	\$40,341
Granger, Kay (R-TX)	\$39,293
Moolenaar, John (R-MI)	\$38,025
Sherrill, Mikie (D-NJ)	\$37,903
Horsford, Steven (D-NV)	\$37,752

Candidate	Amount
Newhouse, Dan (R-WA)	\$37,684
Beutler, Jaime Herrera (R-WA)	\$36,701
Wittman, Rob (R-VA)	\$36,590
Aguilar, Pete (D-CA)	\$36,588
Fortenberry, Jeff (R-NE)	\$36,175
Brown, Anthony (D-MD)	\$36,000
Cuellar, Henry (D-TX)	\$36,000
Miller, Carol (R-WV)	\$35,793
Finkenauer, Abby (D-IA)	\$35,669
Beatty, Joyce (D-OH)	\$35,560
Smucker, Lloyd (R-PA)	\$35,235
Stauber, Pete (R-MN)	\$35,106
Bost, Mike (R-IL)	\$34,850
Murphy, Stephanie (D-FL)	\$34,500

Candidate	Amount
Aderholt, Robert B (R-AL)	\$34,309
Suozzi, Tom (D-NY)	\$34,035
Clarke, Yvette D (D-NY)	\$33,501
Fulcher, Russ (R-ID)	\$33,500
Schiff, Adam (D-CA)	\$33,433
Stevens, Haley (D-MI)	\$33,428
Kirkpatrick, Ann (D-AZ)	\$33,139
Huizenga, Bill (R-MI)	\$33,050
Sewell, Terri (D-AL)	\$33,050
Curtis, John (R-UT)	\$33,000
Soto, Darren (D-FL)	\$33,000
Pascrell, Bill Jr (D-NJ)	\$32,600
Ruiz, Raul (D-CA)	\$32,565
Ryan, Tim (D-OH)	\$32,509

Candidate	Amount
Calvert, Ken (R-CA)	\$32,500
Wenstrup, Brad (R-OH)	\$32,266
Timmons, William (R-SC)	\$32,250
Lowenthal, Alan (D-CA)	\$32,000
Gimenez, Carlos (R-FL)	\$31,966
Carbajal, Salud (D-CA)	\$31,750
Reschenthaler, Guy (R-PA)	\$31,635
Krishnamoorthi, Raja (D-IL)	\$31,297
Schultz, Debbie Wasserman (D-FL)	\$30,645
Rochester, Lisa Blunt (D-DE)	\$30,630
Walorski, Jackie (R-IN)	\$30,504
Bucshon, Larry (R-IN)	\$30,500
Gibbs, Bob (R-OH)	\$29,506
Grothman, Glenn S (R-WI)	\$29,300

Candidate	Amount
Ocasio-Cortez, Alexandria (D-NY)	\$28,892
McAdams, Ben (D-UT)	\$28,498
Ferguson, Drew (R-GA)	\$28,420
Bass, Karen (D-CA)	\$28,250
Kelly, Trent (R-MS)	\$28,000
Thompson, Glenn (R-PA)	\$27,735
Burgess, Michael (R-TX)	\$27,500
Smith, Adrian (R-NE)	\$27,500
Banks, Jim (R-IN)	\$27,260
Olson, Pete (R-TX)	\$27,250
Davis, Danny K (D-IL)	\$27,001
Armstrong, Kelly (R-ND)	\$27,000
Carter, Buddy (R-GA)	\$26,700
Bishop, Dan (R-NC)	\$26,659

Candidate	Amount
Emmer, Tom (R-MN)	\$26,601
Ruppersberger, Dutch (D-MD)	\$26,500
Foster, Bill (D-IL)	\$26,311
Demings, Val (D-FL)	\$26,050
Rouzer, David (R-NC)	\$26,050
Hartzler, Vicky (R-MO)	\$26,043
Stewart, Chris (R-UT)	\$26,010
Zeldin, Lee (R-NY)	\$26,001
McClain, Lisa (R-MI)	\$26,000
Palazzo, Steven (R-MS)	\$26,000
Casten, Sean (D-IL)	\$25,795
Schneider, Brad (D-IL)	\$25,605
Lawrence, Brenda (D-MI)	\$25,550
Kilmer, Derek (D-WA)	\$25,500

Candidate	Amount
Meuser, Dan (R-PA)	\$24,535
Bilirakis, Gus (R-FL)	\$24,500
Joyce, John (R-PA)	\$24,300
Feenstra, Randy (R-IA)	\$24,225
Larson, John (D-CT)	\$24,200
Van Drew, Jeff (R-NJ)	\$24,136
Guest, Michael (R-MS)	\$24,012
Small, Xochitl Torres (D-NM)	\$23,943
Jordan, Jim (R-OH)	\$23,791
Bentz, Cliff (R-OR)	\$23,750
Guthrie, Brett (R-KY)	\$23,500
Peterson, Collin (D-MN)	\$23,250
Meijer, Peter (R-MI)	\$22,916
Tiffany, Tom (R-WI)	\$22,550

Candidate	Amount
Gomez, Jimmy (D-CA)	\$22,500
Barr, Andy (R-KY)	\$22,407
Houlahan, Chrissy (D-PA)	\$22,354
Adams, Alma (D-NC)	\$22,000
Mooney, Alex (R-WV)	\$22,000
Payne, Donald M Jr (D-NJ)	\$22,000
Byrne, Bradley (R-AL)	\$21,850
Fudge, Marcia (D-OH)	\$21,500
Matsui, Doris (D-CA)	\$21,450
Hollingsworth, Trey (R-IN)	\$21,000
Napolitano, Grace (D-CA)	\$21,000
Gallego, Ruben (D-AZ)	\$20,946
Spanberger, Abigail (D-VA)	\$20,889
Riggleman, Denver (R-VA)	\$20,605

Candidate	Amount
McCaul, Michael (R-TX)	\$20,580
Brindisi, Anthony (D-NY)	\$20,525
McHenry, Patrick (R-NC)	\$20,525
Evans, Dwight (D-PA)	\$20,500
Chabot, Steve (R-OH)	\$20,426
Lieu, Ted (D-CA)	\$20,115
Waltz, Michael (R-FL)	\$20,015
Swalwell, Eric (D-CA)	\$19,632
Lesko, Debbie (R-AZ)	\$19,593
Estes, Ron (R-KS)	\$19,500
Lawson, Al (D-FL)	\$19,500
Moore, Barry (R-AL)	\$19,500
DelBene, Suzan (D-WA)	\$19,398
Cline, Ben (R-VA)	\$19,000

Candidate	Amount
Vela, Filemon (D-TX)	\$19,000
Burchett, Tim (R-TN)	\$18,825
Biggs, Andy (R-AZ)	\$18,750
Diaz-Balart, Mario (R-FL)	\$18,750
Scott, Bobby (D-VA)	\$18,750
Mast, Brian (R-FL)	\$18,655
Norman, Ralph (R-SC)	\$18,625
Comer, James (R-KY)	\$18,500
Womack, Steve (R-AR)	\$18,500
Keller, Fred (R-PA)	\$18,300
Wright, Ron (R-TX)	\$18,200
LaMalfa, Doug (R-CA)	\$18,000
Rogers, Mike D (R-AL)	\$18,000
Smith, Adam (D-WA)	\$18,000

Candidate	Amount
Kuster, Ann (D-NH)	\$17,960
Steil, Bryan (R-WI)	\$17,615
Levin, Andy (D-MI)	\$17,540
Dunn, Neal (R-FL)	\$17,500
Lucas, Frank D (R-OK)	\$17,500
Hinson, Ashley (R-IA)	\$17,440
Brownley, Julia (D-CA)	\$17,003
Barragan, Nanette (D-CA)	\$17,000
Coleman, Bonnie Watson (D-NJ)	\$17,000
Gooden, Lance (R-TX)	\$17,000
Rutherford, John (R-FL)	\$17,000
Yarmuth, John (D-KY)	\$17,000
Holding, George (R-NC)	\$16,750
Welch, Peter (D-VT)	\$16,595

Candidate	Amount
Fitzgerald, Scott (R-WI)	\$16,550
Carl, Jerry (R-AL)	\$16,510
Schweikert, David (R-AZ)	\$16,510
Bishop, Sanford (D-GA)	\$16,500
Gosar, Paul (R-AZ)	\$16,500
Westerman, Bruce (R-AR)	\$16,500
Bonamici, Suzanne (D-OR)	\$16,010
Boyle, Brendan (D-PA)	\$16,000
Courtney, Joe (D-CT)	\$16,000
Crawford, Rick (R-AR)	\$16,000
Meeks, Gregory W (D-NY)	\$16,000
Price, David (D-NC)	\$16,000
Lynch, Stephen F (D-MA)	\$15,950
Beyer, Don (D-VA)	\$15,800

Candidate	Amount
Hagedorn, Jim (R-MN)	\$15,603
Cooper, Jim (D-TN)	\$15,525
Morelle, Joseph D (D-NY)	\$15,525
Steube, Greg (R-FL)	\$15,500
Vargas, Juan (D-CA)	\$15,500
Rose, John (R-TN)	\$15,400
Lee, Susie (D-NV)	\$15,325
Cartwright, Matt (D-PA)	\$15,144
Amodei, Mark (R-NV)	\$15,035
Scott, David (D-GA)	\$15,025
DeGette, Diana (D-CO)	\$15,000
Hastings, Alcee (D-FL)	\$15,000
Mitchell, Paul (R-MI)	\$15,000
Craig, Angie (D-MN)	\$14,874

Candidate	Amount
Gonzalez, Vicente (D-TX)	\$14,735
Correa, Lou (D-CA)	\$14,600
Slotkin, Elissa (D-MI)	\$14,534
Hill, French (R-AR)	\$14,425
Graves, Tom (R-GA)	\$14,250
Brooks, Mo (R-AL)	\$14,000
Connolly, Gerry (D-VA)	\$14,000
Lamborn, Douglas L (R-CO)	\$14,000
Larsen, Rick (D-WA)	\$13,500
Scanlon, Mary Gay (D-PA)	\$13,375
Axne, Cindy (D-IA)	\$13,279
Delgado, Antonio (D-NY)	\$13,173
Lamb, Conor (D-PA)	\$13,066
Moore, Gwen (D-WI)	\$13,005

Candidate	Amount
Budd, Ted (R-NC)	\$13,000
Johnson, Eddie Bernice (D-TX)	\$13,000
Palmer, Gary (R-AL)	\$13,000
Wild, Susan (D-PA)	\$12,909
Donalds, Byron (R-FL)	\$12,817
Collins, Doug (R-GA)	\$12,810
Chu, Judy (D-CA)	\$12,750
Keating, Bill (D-MA)	\$12,750
Turner, Michael R (R-OH)	\$12,606
Davidson, Warren (R-OH)	\$12,506
Lipinski, Daniel (D-IL)	\$12,501
Harris, Andy (R-MD)	\$12,500
Johnson, Mike (R-LA)	\$12,500
Lewis, John (D-GA)	\$12,455

Candidate	Amount
Frankel, Lois J (D-FL)	\$12,105
Perlmutter, Ed (D-CO)	\$12,015
Langevin, Jim (D-RI)	\$12,000
Visclosky, Pete (D-IN)	\$12,000
Weber, Randy (R-TX)	\$12,000
Allen, Richard W (R-GA)	\$11,850
Garcia, Mike (R-CA)	\$11,777
Scott, Austin (R-GA)	\$11,750
Roy, Chip (R-TX)	\$11,360
Miller, Mary (R-IL)	\$11,200
Horn, Kendra (D-OK)	\$11,187
Cleaver, Emanuel (D-MO)	\$11,125
Young, Don (R-AK)	\$11,039
Tipton, Scott (R-CO)	\$11,025

Candidate	Amount
Buck, Ken (R-CO)	\$11,000
Loudermilk, Barry (R-GA)	\$11,000
Levin, Mike (D-CA)	\$10,896
Engel, Eliot (D-NY)	\$10,850
Huffman, Jared (D-CA)	\$10,750
Laturner, Jake (R-KS)	\$10,750
McClintock, Tom (R-CA)	\$10,570
Pocan, Mark (D-WI)	\$10,529
Murphy, Greg (R-NC)	\$10,500
Porter, Katie (D-CA)	\$10,380
Deutch, Ted (D-FL)	\$10,040
Quigley, Mike (D-IL)	\$10,001
Baird, Jim (R-IN)	\$10,000
Cammack, Kat (R-FL)	\$10,000

Candidate	Amount
Clay, William L Jr (D-MO)	\$10,000
Eshoo, Anna (D-CA)	\$10,000
Himes, Jim (D-CT)	\$9,825
Kennedy, Joe III (D-MA)	\$9,790
Roybal-Allard, Lucille (D-CA)	\$9,750
Higgins, Brian M (D-NY)	\$9,525
Johnson, Hank (D-GA)	\$9,525
Hice, Jody (R-GA)	\$9,500
Harder, Josh (D-CA)	\$9,448
Luria, Elaine (D-VA)	\$9,381
Hurd, Will (R-TX)	\$9,250
Cox, TJ (D-CA)	\$9,094
Carter, John (R-TX)	\$9,078
Tenney, Claudia (R-NY)	\$9,069

Candidate	Amount
Spano, Ross (R-FL)	\$9,052
Higgins, Clay (R-LA)	\$9,030
Babin, Brian (R-TX)	\$9,010
Mrvan, Frank J (D-IN)	\$9,005
Cook, Paul (R-CA)	\$9,000
Garamendi, John (D-CA)	\$9,000
Gianforte, Greg (R-MT)	\$9,000
Williams, Roger (R-TX)	\$9,000
Takano, Mark (D-CA)	\$8,700
McCollum, Betty (D-MN)	\$8,600
Case, Ed (D-HI)	\$8,550
Moore, Blake (R-UT)	\$8,550
Torres, Norma (D-CA)	\$8,516
Rice, Kathleen (D-NY)	\$8,500

Candidate	Amount
Webster, Daniel (R-FL)	\$8,500
Williams, Nikema Natassha (D-GA)	\$8,475
Salazar, Maria (R-FL)	\$8,419
Watkins, Steve (R-KS)	\$8,360
Rosendale, Matt (R-MT)	\$8,330
Ratcliffe, John (R-TX)	\$8,250
Cummings, Elijah E (D-MD)	\$8,056
Desaulnier, Mark (D-CA)	\$8,005
Wilson, Frederica (D-FL)	\$8,005
Garcia, Jesus (D-IL)	\$8,001
Posey, Bill (R-FL)	\$8,000
Jeffries, Hakeem (D-NY)	\$7,646
Davids, Sharice (D-KS)	\$7,626
Gohmert, Louis B Jr (R-TX)	\$7,600

Candidate	Amount
Foxx, Virginia (R-NC)	\$7,543
Crist, Charlie (D-FL)	\$7,520
Sanchez, Linda (D-CA)	\$7,505
Brooks, Susan (R-IN)	\$7,500
Kustoff, David (R-TN)	\$7,500
Kim, Young (R-CA)	\$7,431
Van Duyne, Beth (R-TX)	\$7,338
Bera, Ami (D-CA)	\$7,225
Strickland, Marilyn (D-WA)	\$7,181
Boebert, Lauren (R-CO)	\$7,049
Garcia, Sylvia (D-TX)	\$7,000
Taylor, Van (R-TX)	\$7,000
Cunningham, Joe (D-SC)	\$6,960
Nadler, Jerrold (D-NY)	\$6,638

Candidate	Amount
Kim, Andy (D-NJ)	\$6,624
Jackson, Ronny (R-TX)	\$6,620
Mucarsel-Powell, Debbie (D-FL)	\$6,526
DeLauro, Rosa L (D-CT)	\$6,500
Pence, Greg (R-IN)	\$6,500
Sires, Albio (D-NJ)	\$6,500
Malinowski, Tom (D-NJ)	\$6,392
Wexton, Jennifer (D-VA)	\$6,367
Khanna, Ro (D-CA)	\$6,346
Issa, Darrell (R-CA)	\$6,343
Clark, Katherine (D-MA)	\$6,300
Kahele, Kai (D-HI)	\$6,251
Rouda, Harley (D-CA)	\$6,088
Carson, Andre (D-IN)	\$6,000

Candidate	Amount
Franklin, Scott (R-FL)	\$6,000
Heck, Dennis (D-WA)	\$6,000
Jackson Lee, Sheila (D-TX)	\$6,000
Marchant, Kenny (R-TX)	\$6,000
Plaskett, Stacey (D-VI)	\$6,000
Velazquez, Nydia (D-NY)	\$6,000
Escobar, Veronica (D-TX)	\$5,750
Gaetz, Matt (R-FL)	\$5,650
Walker, Mark (R-NC)	\$5,590
Dean, Madeleine (D-PA)	\$5,510
Duffy, Sean P (R-WI)	\$5,500
Lowey, Nita M (D-NY)	\$5,500
Roby, Martha (R-AL)	\$5,500
Blumenauer, Earl (D-OR)	\$5,400

Candidate	Amount
Massie, Thomas (R-KY)	\$5,370
Bice, Stephanie (R-OK)	\$5,345
Stanton, Greg (D-AZ)	\$5,309
Pfluger, August (R-TX)	\$5,252
Omar, Ilhan (D-MN)	\$5,059
Mfume, Kweisi (D-MD)	\$5,020
Abraham, Ralph (R-LA)	\$5,000
McBath, Lucy (D-GA)	\$4,902
Newman, Marie (D-IL)	\$4,713
Doggett, Lloyd (D-TX)	\$4,500
Cloud, Michael (R-TX)	\$4,350
Green, Mark (R-TN)	\$4,250
Cawthorn, Madison (R-NC)	\$4,100
Haaland, Debra (D-NM)	\$4,100

Candidate	Amount
Conaway, Mike (R-TX)	\$4,000
Schrier, Kim (D-WA)	\$3,673
Harshbarger, Diana (R-TN)	\$3,625
Herrell, Yvette (R-NM)	\$3,611
Mace, Nancy (R-SC)	\$3,600
Golden, Jared (D-ME)	\$3,595
Meadows, Mark (R-NC)	\$3,500
Meng, Grace (D-NY)	\$3,500
Malliotakis, Nicole (R-NY)	\$3,390
Hayes, Jahana (D-CT)	\$3,307
Moulton, Seth (D-MA)	\$3,127
Castor, Kathy (D-FL)	\$3,014
Smith, Chris (R-NJ)	\$3,010
Rogers, Hal (R-KY)	\$3,000

Candidate	Amount
Sherman, Brad (D-CA)	\$3,000
Underwood, Lauren A (D-IL)	\$2,984
Valadao, David (R-CA)	\$2,874
Pappas, Chris (D-NH)	\$2,696
Maloney, Sean Patrick (D-NY)	\$2,678
Lee, Barbara (D-CA)	\$2,615
Green, Al (D-TX)	\$2,500
Titus, Dina (D-NV)	\$2,500
Yoho, Ted (R-FL)	\$2,500
Gonzales, Tony (R-TX)	\$2,489
Thornberry, Mac (R-TX)	\$2,400
Tlaib, Rashida (D-MI)	\$2,356
Allred, Colin (D-TX)	\$2,191
Bowman, Jamaal (D-NY)	\$2,161

Candidate	Amount
Gonzalez, Jenniffer (3-PR)	\$2,080
Spartz, Victoria (R-IN)	\$2,039
Owens, Burgess (R-UT)	\$2,034
Lofgren, Zoe (D-CA)	\$2,015
Hern, Kevin (R-OK)	\$2,000
King, Pete (R-NY)	\$2,000
Sensenbrenner, Jim (R-WI)	\$2,000
Sessions, Pete (R-TX)	\$2,000
Waters, Maxine (D-CA)	\$2,000
Phillips, Dean (D-MN)	\$1,954
Ross, Deborah (D-NC)	\$1,886
Fischbach, Michelle (R-MN)	\$1,879
Crow, Jason (D-CO)	\$1,716
Hill, Katie (D-CA)	\$1,692

Candidate	Amount
Greene, Marjorie Taylor (R-GA)	\$1,592
Maloney, Carolyn B (D-NY)	\$1,512
Mann, Tracey (R-KS)	\$1,500
Trahan, Lori (D-MA)	\$1,275
Good, Bob (R-VA)	\$1,267
Pressley, Ayanna (D-MA)	\$1,246
Stansbury, Melanie (D-NM)	\$1,100
Shalala, Donna (D-FL)	\$1,057
Jayapal, Pramila (D-WA)	\$1,050
Jacobs, Chris (R-NY)	\$1,030
Manning, Kathy (D-NC)	\$1,030
Carter, Troy (D-LA)	\$1,000
Cohen, Steve (D-TN)	\$1,000
Davis, Susan (D-CA)	\$1,000

Candidate	Amount
Desjarlais, Scott (R-TN)	\$1,000
Flores, Bill (R-TX)	\$1,000
Loebsack, David (D-IA)	\$1,000
Serrano, Jose E (D-NY)	\$1,000
Castro, Joaquin (D-TX)	\$855
McGovern, James P (D-MA)	\$847
Bourdeaux, Carolyn (D-GA)	\$844
Jones, Mondaire (D-NY)	\$764
Cisneros, Gil (D-CA)	\$738
Torres, Ritchie (D-NY)	\$720
Steel, Michelle (R-CA)	\$711
Bush, Cori (D-MO)	\$669
Neguse, Joseph (D-CO)	\$655
Garbarino, Andrew (R-NY)	\$539

Candidate	Amount
Clyde, Andrew (R-GA)	\$500
Nehls, Troy (R-TX)	\$439
Miller-Meeks, Mariannette (R-IA)	\$364
Auchincloss, Jake (D-MA)	\$300
Amash, Justin (L)	\$250
King, Steven A (R-IA)	\$250
Roe, Phil (R-TN)	\$250
Grijalva, Raul M (D-AZ)	\$118
Fernandez, Teresa Leger (D-NM)	\$117
Schakowsky, Jan (D-IL)	\$101
Trone, David (D-MD)	\$25
Sarbanes, John (D-MD)	\$15
Raskin, Jamie (D-MD)	\$10
Cicilline, David (D-RI)	\$6

Exhibit B

Motion to Intervene and Comments of Michael Mabee

In Docket No. RM22-5-000

Information for 2020 Election Cycle from OpenSecrets.org (as of January 7, 2022)

Table 1: Total Amount of Top 20 Electric Utility Companies' Contributions:¹

Rank	Contributor	Total Contributions
1	Exelon Corp	\$2,173,240
2	National Rural Electric Cooperative Assn	\$2,140,278
3	NextEra Energy	\$1,905,877
4	Southern Co	\$1,421,335
5	PG&E Corp	\$1,282,400
6	Duke Energy	\$1,212,008
7	Freepoint Commodities	\$1,126,453
8	Dominion Energy	\$886,376
9	Pinnacle West Capital	\$835,598
10	Edison Electric Institute	\$787,637
11	Sempra Energy	\$726,551
12	Xcel Energy	\$673,054
13	DTE Energy	\$661,885
14	Entergy Corp	\$641,776
15	Edison International	\$628,513
16	FirstEnergy Corp	\$586,517
17	NiSource Inc	\$567,627
18	Fortis Inc	\$502,011
19	American Electric Power	\$485,367
20	Berkshire Hathaway	\$459,633

¹ Source: <https://www.opensecrets.org/industries/contrib.php?ind=E08&Bkdn=DemRep&cycle=2020>

Information for 2021 from OpenSecrets.org (as of January 7, 2022)

Table 2: Lobbying by Entity:²

Client/Parent	Total
Edison Electric Institute	\$6,871,491
Southern Co	\$5,760,000
American Electric Power	\$5,162,039
NextEra Energy	\$3,975,000
Exelon Corp	\$3,795,000
Duke Energy	\$3,090,000
PG&E Corp	\$2,700,000
Energy Capital Partners	\$2,480,000
Dominion Energy	\$2,100,000
National Rural Electric Cooperative Assn	\$1,930,000
Sempra Energy	\$1,890,000
Xcel Energy	\$1,780,000
Entergy Corp	\$1,682,000
Public Service Enterprise Group	\$1,670,000
Ameren Corp	\$1,570,000
FirstEnergy Corp	\$1,528,360
Nuclear Energy Institute	\$1,510,000
Edison International	\$1,480,000
Berkshire Hathaway	\$1,130,000
CMS Energy	\$880,000
American Public Power Assn	\$820,000
Pinnacle West Capital	\$750,000
Brookfield Business Partners	\$730,000
Iberdrola SA	\$710,000
Vistra Corp	\$700,000
WEC Energy Group	\$684,000
Salt River Project	\$660,000
DTE Energy	\$640,000
Fortis Inc	\$620,000
Covanta Holding	\$590,000
Emera Inc	\$570,987

² Source: <https://www.opensecrets.org/industries/lobbying.php?cycle=2020&ind=E08>

AES Corp	\$570,000
Idacorp Inc	\$540,000
National Grid plc	\$530,000
Consolidated Edison Inc	\$530,000
Large Public Power Council	\$525,000
Energy Forward	\$520,000
BWX Technologies	\$520,000
Alliant Energy	\$506,000
CenterPoint Energy	\$480,000
Eversource Energy	\$450,000
Puget Equico	\$420,000
Cameco Corp	\$410,000
Cleco Corp	\$370,000
Centrus Energy	\$340,000
NiSource Inc	\$330,000
NRG Energy	\$330,000
Northern California Power Agency	\$316,869
Urenco Group	\$310,000
Portland General Electric	\$300,000
PPL Corp	\$280,000
Nuclear Development LLC	\$255,000
OGE Energy	\$250,000
LG&E & KU Energy LLC	\$250,000
Mainspring Energy	\$240,000
Orano Group	\$240,000
PJM Interconnection	\$240,000
City of Sacramento, CA	\$240,000
TerraPower LLC	\$240,000
Puerto Rico Electric Power Authority	\$230,000
Piedmont Municipal Power Agency	\$226,500
Tenaska Energy	\$215,000
Talen Energy	\$200,000
CTC Global	\$200,000
Tri-State Generation & Transmission Assn	\$190,000
LS Power	\$180,000
Great Basin Transmission	\$180,000
Commonwealth Fusion Systems	\$170,000

Transmission Access Policy Study Group	\$170,000
Uranium Producers of America	\$150,000
Columbia River Treaty Power Group	\$150,000
Evergy Inc	\$150,000
Midcontinent Indep Transmission Sys Operator	\$150,000
Nuclear Energy Systems of Ukraine	\$140,000
Chelan County, WA	\$135,000
ENGIE	\$130,000
Heartland Consumers Power District	\$130,000
Freepoint Commodities	\$120,000
Overton LLC	\$120,000
Electric Power Supply Assn	\$120,000
Canadian Electricity Assn	\$120,000
Avista Corp	\$120,000
Tennessee Valley Public Power Assn	\$120,000
Voith Hydro	\$120,000
Public Power Council	\$116,775
Oglethorpe Power	\$116,263
American Municipal Power Inc	\$110,687
Brookfield Asset Management	\$110,000
Advanced Energy Management Alliance	\$100,000
EDF Group	\$100,000
Fedn of Electric Power Cos of Japan	\$100,000
Decommissioning Plant Coalition	\$100,000
East Kentucky Power Cooperative	\$100,000
City of Los Angeles, CA	\$95,000
City Public Service	\$90,000
Brownsville Public Utilities Board	\$90,000
American Transmission	\$90,000
Electricities of North Carolina	\$90,000
Energy Harbor	\$90,000
Northwest Public Power Assn	\$90,000
Nuclear Care Partners	\$90,000
PNM Resources	\$90,000
PowerSouth Energy Cooperative	\$90,000
Hudson Yards Gen-Par	\$90,000
IP3 International	\$90,000

ISO New England	\$90,000
Southern California Public Power Auth	\$90,000
Omaha Public Power District	\$89,968
City of Seattle, WA	\$82,758
NorthWestern Corp	\$80,000
Snohomish County, WA	\$80,000
Hydro-Quebec	\$80,000
Gridwise Alliance	\$80,000
Colorado Springs Utilities	\$70,000
City Light & Power Inc	\$60,000
Atkins Nuclear Secured	\$60,000
ALLETE Inc	\$60,000
Energy Northwest	\$60,000
El Paso Electric	\$60,000
Greenville Utilities Commission	\$60,000
Grant County, WA	\$60,000
NC Assn of Electric Cooperatives	\$60,000
Municipal Electric Authority of Georgia	\$60,000
Northeast Public Power Assn	\$60,000
Southwestern Power Group	\$60,000
UGI Corp	\$60,000
SunZia Southwest Transmission Project	\$52,020
Missouri River Energy Services	\$50,636
Hawaiian Electric Industries	\$50,000
National Assn of Energy Service Companies	\$45,391
Copper Valley Electric Assn	\$42,500
Energy Storage Assn	\$40,000
Flibe Energy	\$40,000
PSEG Power	\$40,000
Symbion Power	\$40,000
Alaska Electric Light & Power	\$35,000
Alaska Village Electric Cooperative	\$30,000
American Nuclear Society	\$30,000
Grand Canyon State Electric Cooperative Assn	\$30,000
Jacksonville Electric Authority	\$30,000
Mohave Electric Cooperative	\$30,000
Naknek Electric Assn	\$30,000

Veolia Environnement	\$30,000
Dairyland Power Cooperative	\$26,000
Electric Reliability Coordinating Council	\$20,000
Fall River Rural Electric Cooperative	\$20,000
Basin Electric Power Cooperative	\$20,000
New York Assn of Public Power	\$20,000
Lightbridge Corp	\$20,000
S Utah Valley Electric Spec Serv Dist	\$20,000
Alaska Power & Telephone	\$18,000
Ketchikan Public Utilities	\$13,500
PNGC Power	\$10,523
Southeastern Federal Power Customer Grp	\$10,000
Inside Passage Electric Cooperative	\$10,000
Minnkota Power Cooperative	\$10,000
Black Hills Corp	\$10,000
Unitil Corp	\$10,000
Thorium Energy Alliance	\$7,000

Exhibit C

Motion to Intervene and Comments of Michael Mabee

In Docket No. RM22-5-000

Information from OpenSecrets.org (as of January 8, 2022)

Electric Utility Industry's Congressional Contributions by Year

Year	Total Contributions
2020	\$28,999,572
2018	\$25,336,981
2016	\$32,201,989
2014	\$22,104,177
2012	\$23,715,334
2010	\$20,800,656
2008	\$21,951,401
2006	\$16,690,995
2004	\$16,248,944
2002	\$21,557,402

Electric Utility Industry's Congressional Lobbying by Year

Year	Total Lobbying
2021	\$79.32 Million
2020	\$109.67 Million
2019	\$120.09 Million
2018	\$123.84 Million
2017	\$116.58 Million
2016	\$116.26 Million
2015	\$117.81 Million
2014	\$122.81 Million
2013	\$129.6 Million
2012	\$147.46 Million
2011	\$147.07 Million
2010	\$193.02 Million
2009	\$147.17 Million
2008	\$161.93 Million
2007	\$112.25 Million
2006	\$111.57 Million
2005	\$98.46 Million
2004	\$93.7 Million
2003	\$92.59 Million