

Office of Management and Budget 725 17th St NW, Washington, DC 20503 [Filed via Reginfo.gov]

November 12, 2024

Re: Notice: Agency Information Collection Proposed New Survey

To Whom It May Concern:

The American Public Power Association (APPA) appreciates this opportunity to comment on the Energy Information Administration's (EIA) Notice: Agency Information Collection Proposed New Survey. We urge the EIA and Office of Information and Regulatory Affairs to exclude small entities from this survey

APPA is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. Public power utilities serve over 54 million people in 49 states (all except Hawaii and five U.S. territories, and account for 15 percent of all sales of electric energy (kilowatthours) to end-use consumers. Public power utilities are load-serving entities, with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of the utilities with the long-term interests of the residents and businesses in their communities.

APPA, the American Public Gas Association (APGA), and National Rural Electric Cooperative Association (NRECA) filed joint comments in response to the June 20, 2024, notice and request for comments: Agency Information Collection Proposed New survey. A copy of the joint comments is provided as Appendix A. We urged EIA to forgo this proposed survey because the data requested is unnecessary, burdensome, and does not align with the Notice's stated purpose of informing federal and state energy assistance programs. In an email response to our

¹ Energy Information Administration, Notice: Agency Information Collection Proposed New Survey, 89 Fed. Reg. 198 (82,598 -- 82,599) (October 11, 2024).

comments, EIA largely rejected arguments raised against the survey and this most recent notice shows that the survey as described remains unchanged. As such, APPA's initial concerns remain.

In coordination with our members, we have a long history of advocating for Low Income Home Energy Assistance Program (LIHEAP) funding. We also support policymakers having data to inform energy assistance program funding decisions. However, LIHEAP allocations are largely determined by energy expenditures, and not the proposed data collection on electric service final notices, disconnections, and reconnections for bill non-payment across residential customers. Furthermore, the proposed data points do not correlate with a residential customer's ability to pay their electric bill nor the customer's need for aid. The utility level data reporting proposed by EIA is also unnecessary. Aggregated state level data is used to inform LIHEAP, not utility level data.

EIA states that the survey is intended to balance the burden on smaller electric utilities with the need to collect "comprehensive" data. Specifically, EIA says that data collection will be limited to "electric service providers that have annual sales of more than 200,000 megawatt hours annually." EIA's notice explains that there will be a periodic census for all electric utilities that complete the Form EIA-861, excluding the smaller utilities who are eligible to complete Form EIA-861S. For a utility to be eligible to complete the EIA-861S, they must meet the following criteria.

- 1. Report less than only 200,000 megawatt hours (MWh) on the last previous Form EIA-861
- 2. Provide only bundled service (generation and distribution)
- 3. Are not needed to ensure acceptable quality of statistical estimates
- 4. Are not part of the aggregate of Tennessee Valley Authority or WPPI Energy
- 5. Do not report on Form EIA-861M

There are 520 public power utilities with residential customers that submitted data for the 2023 EIA Form-861 dataset. Of the 520 public power utilities,104 had sales less than 200,000 MWh and 371 would be considered "small entities," i.e., serving a population of 50,000 or fewer, as provided under the Regulatory Flexibility Act.² APPA calculated population estimates using EIA's residential customer count and multiplying it by the Census America's Families and Living

² According to the Regulatory Flexibility Act (RFA; 5 U.S.C. §§601-612): (5) the term "small governmental jurisdiction" means governments of cities, counties, towns, townships, villages, school districts, or special districts, with a population of less than fifty thousand, unless an agency establishes, after opportunity for public comment, one or more definitions of such term which are appropriate to the activities of the agency and which are based on such factors as location in rural or sparsely populated areas or limited revenues due to the population of such jurisdiction, and publishes such definition(s) in the Federal Register

Arrangements average household size of 2.5 persons.³ This data set is provided as Table 1 Appendix B.

For years in between censuses, EIA plans to use cut-off samples from Form-861M, based on utility size and state coverage. Though this reduces the overall number of utilities impacted, this dataset is not well defined. APPA is unable to determine how many public power utilities, including small utilities, will be impacted. According to the 2023 final dataset, 92 public power utilities with residential customers submitted information for EIA Form-861M. As shown in Table 2, using January 2023 as an example, 13 of the 92 public power utilities had less than 200,000 MWh in sales. Calculating population estimates revealed that 39 of the 92 public power utilities serve populations of less than 50,000. This data is shown in Table 2 in Appendix B.

EIA does not define the frequency of census years. Some briefing materials imply that in the three-year clearance period sought, only the first year would be a census year, but nowhere does EIA state that explicitly. As a result, all three years could subject the full list of Form EIA-861 respondents to the new survey. Without clear parameters, APPA cannot determine what the burden will be for public power for each year of the proposed data collection.

Should EIA continue to pursue this new survey, **APPA strongly recommends increasing the** threshold for reporting to exclude small entities, or at the very least to exclude the utilities with less than 200,000 MWh in sales that EIA purports to intend to exclude.

Please reach out to APPA with any questions regarding our letter. We appreciate EIA's consideration of our comments.

Sincerely,

Desmarie M. Waterhouse
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³ https://www.census.gov/data/tables/2022/demo/families/cps-2022.html

Appendix A:







Marc Harnish
U.S. Energy Information Administration
1000 Independence Ave., SW
Washington, DC 20585
[Filed via email to EIA112@eia.gov]

August 16, 2024

Re: Notice and request for comments: Agency Information Collection Proposed New Survey

Mr. Harnish:

The undersigned associations appreciate this opportunity to comment on the Energy Information Administration's (EIA) Notice and Request for Comment: Agency Information Collection Proposed New Survey.⁴ The members of the American Public Gas Association (APGA), American Public Power Association (APPA), and National Rural Electric Cooperative Association (Joint Commenters) are community-owned, cost-based, not-for-profit utilities. Each is directly answerable to these communities and the Joint Commentors are taking the positions expressed here because we believe they are in the best interest of the communities our members serve.

We believe that EIA's proposed annual Residential Utility Disconnections Survey is flawed. As described, the proposed data collection is unnecessarily burdensome on those required to participate, will not paint an accurate picture of energy assistance need, and will do little to inform or support federal or state energy assistance programs. EIA does not need to conduct another survey to conclude that the Low Income Home Energy Assistance Program (LIHEAP) is dramatically underfunded. For example, in 2023, Congress provided \$6 billion for LIHEAP – \$2 billion more than the \$4 billion that would have been otherwise provided under the regular appropriation. As a result, LIHEAP in 2023 was able to reach an estimated 7 million households. However, that was still a fraction of the 33 million households eligible for LIHEAP. Likewise, we already know what will happen if funding returns in 2025 to \$4 billion:

⁴ Energy Information Administration, Notice and request for comments: Agency Information Collection Proposed New Survey, 89 Fed. Reg. 119 (51,182 -- 51,883) (June 20, 2024).

⁵ Testimony of Mark Wolfe, Executive Director, National Energy Assistance Directors Association, before the House Subcommittee on Labor, Health and Human Services and Education and Related Agencies in support of FY 2025 funding for the Low Income Home Energy Assistance Program (May 3, 2024).

⁶ Administration for Children & Families, "LIHEAP Income-Eligible Households Based on Federal Maximum Guidelines – All Grantees Summed",

- A reduction in crisis assistance to families to help with remaining winter heating bills;
- A cut back on weatherization assistance; and
- Either a reduction or elimination of cooling programs.⁷

APGA is the trade association for more than 730 communities across the U.S. that own and operate their retail natural gas distribution entities. They include not-for-profit gas distribution systems owned by municipalities and other local government entities, all locally accountable to the citizens they serve. Public gas systems focus on providing safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.8

APPA is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. Public power utilities serve over 54 million people in 49 states (all except Hawaii and five U.S. territories, and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use consumers. Public power utilities are load-serving entities, with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of the utilities with the long-term interests of the residents and businesses in their communities.

NRECA is the national trade association representing nearly 900 local electric cooperatives and other rural electric utilities. America's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. From suburbs to remote farming communities, electric cooperatives power 1 in 8 Americans and serve as engines of economic development for 42 million Americans across 56 percent of the nation's landscape. America's electric cooperatives serve 92% of all persistent poverty counties in the United States.

Industry's Long-Term Commitment to Providing Energy Assistance

Natural gas and electric providers (utilities) are obligated, in accordance with applicable state law and regulatory requirements, to provide uninterrupted, reliable, safe, and affordable service for human needs, such as home heating and cooling and hot water. Central to this obligation is providing our low-income customers with as many options as possible to help them pay their bills. Utilities understand it may be difficult for customers to cut back on energy usage, which is why many utilities offer customers a variety of flexible billing and payment support programs including, but not limited to:

https://liheappm.acf.hhs.gov/datawarehouse/custom_reports?years=2023|&grantees=AG&reportId=1_(last visited) Aug. 12, 2024).

⁷ Wolfe, supra note 1, at 1.

⁸ For more information, please visit www.apga.org.

- Service Curtailment Moratoria: Curtailing service disconnections on low income and other vulnerable customers for the duration of the winter heating or summer cooling season.
- Flexible Billing, Payment Plans: Offering low-income customers a variety of billing adjustment programs, such as forgiving a portion of preexisting unpaid bills, bill assistance (percentage discounts, set dollar amounts, or percentage of income payment plans, etc.); allowing bill balances to be paid over a longer period of time; and allowing eligible customers the option to choose their billing date to help with their overall monthly budget.
- Increased Fuel Fund Support: Operating, partnering on, or contributing to "fuel funds," independent low-income home energy assistance programs that provide financial support to those experiencing energy poverty that supplement federal programs like LIHEAP and related state and local government assistance. In the case of utility-run fuel funds, it's common for utility employees and customers to contribute.
- Enhanced Community Outreach: Targeted advertising, online, television, radio, social media, print, direct-mail, text, email, and community outreach (food banks, churches, clinics, etc.) to low-income customers promoting company low income assistance programs, local fuel fund and charitable services, and LIHEAP sign up support.
- *Customer Targeting Research*. Using available market, income, and demographic data to define and better target vulnerable populations with better utility low income and emergency service programming.
- Low Income Self-Sufficiency Plans: Allows eligible households to keep up with energy bills via fixed payment plans. This allows customers to learn budgeting, bill payment, and energy efficiency skills.
- Weatherization and Home Assistance: Utilities, either on their own or in partnership with local charities, organize to distribute smart thermostats, perform home weatherization inspections aimed at improving home efficiency, and for eligible homes, make appropriate building envelop repairs and replace old and inefficient heating equipment, which saves in recurring energy use costs on utility bills.

Disconnecting customers is always the utilities' last resort for dealing with unpaid bills. Rigorous processes, determined by state and local regulations, are in place to provide customers with advance notice of potential service disconnection and to educate them on the variety of resources (as described above) to remediate.

Furthermore, numerous regulatory bodies across the nation have established and enforce billing rules that provide customers' extensive protections from shut offs in certain scenarios. According to the LIHEAP Clearinghouse, 40 states and the District of Columbia have cold weather protections, 21 states and the

District of Columbia have hot weather protections, two states have extreme weather protections, and 38 states and the District of Columbia have vulnerable population protections. An example of vulnerable populations includes customers who have medical conditions that require around the clock power to critical care equipment. Again, disconnects are a last resort after all other options are exercised.

Utility LIHEAP Support

The federal government provides energy-related assistance directly and through tax credits to households through a variety of ways, including hazard mitigation, weatherization, energy efficiency, and alternative energy generation. However, LIHEAP is the single largest source of energy assistance funding provided by the federal government to households for their electric and gas utility bills.¹⁰

LIHEAP is a block grant program administered by the Department of Health and Human Services (HHS) provided to states to assist low-income households, particularly those with the lowest incomes, and particularly those that pay a high proportion of household income for home energy. Under LIHEAP, states may set their own LIHEAP income-eligibility limits but must cap those limits at (1) no more than the greater of 150 percent of the Federal Poverty Guidelines (FPG) or 60 percent of the State Median Income, and (2) no less than 110 percent of FPG. They must also give higher benefits to households with the greatest home energy need in relation to household income and number of household members. Additionally, states must provide crisis energy assistance through at least March 15 and have the option to provide home cooling, weatherization, and/or low-cost home energy equipment repairs or replacements. LIHEAP administering agencies generally implement state LIHEAP programs through eligibility determination, application development and collection, energy affordability education, weatherization, crisis, and other programs.

Allocations to states of LIHEAP funds are set annually through the appropriations process, which in turn, relies on the underlying allocation mechanics of the authorizing statute. 12 These calculations rely on several factors, but primarily are intended to reflect estimates of expenditures for home energy by low-income households in the state. 13 The allocation to states as described in the statute and in annual appropriations does not rely on disconnection data.

⁹ U.S. Department of Health and Human Services, Administration for Children and Families. LIHEAP Clearinghouse, *Disconnect Policies* (July 2024)

¹⁰ With its focus on disconnections due to nonpayment of bills, the "various assistance programs across the United States" referenced in the Notice would appear to refer to LIHEAP as administered by the states alongside other state-provided utility bill assistance.

¹¹ 42 USC section 8621(a).

¹² Congressional Research Service, The LIHEAP Formula, (RL33275) (May 2, 2019) at 2.

¹³ Id.

Currently funded at \$4.1 billion, LIHEAP has been effective for more than 41 years in helping nearly 6 million households annually with energy affordability. The flexibility of a block grant helps states, tribes, and territory grantees craft energy assistance and efficiency programming that blends effectively with existing state and utility assistance resources to address vulnerable populations in energy crisis. All this said, while LIHEAP is a highly effective and critical tool in fighting energy poverty in America, it remains woefully underfunded, serving just one in five eligible households with current resources. 15

Utility support of LIHEAP is multifaceted and significant. Utility partnerships with local community action agencies, ¹⁶ low-income advocates, charities, and faith-based organizations, as well as state and local government low income, energy assistance, and affordable housing offices on energy assistance outreach programs designed to drive those in energy poverty to related financial assistance programs. Many of these partnerships span decades and utilities are committed to helping every customer manage through challenging times. The Joint Commenters, in coordination with their respective memberships, also have a long history of advocating for Congress to sufficiently fund LIHEAP.

Additionally, utilities also leverage multi-channel, multi-lingual communications (email, direct mail letters, bill inserts, website, educational videos, radio), virtual and in-person community outreach events, and other enrollment strategies to meet customers where they are and offer the most convenient way for them to understand their options and apply for LIHEAP. Increasingly, utilities have also invested in online portals and other data exchange methods to provide local LIHEAP grantee authorities and energy assistance entities secure access to customer bill information needed to complete LIHEAP applications.

Misalignment Between the Requested Data and Stated Purpose

Collecting national data on residential utility disconnections will not effectively advance the Administration's purpose of informing appropriate levels of budgetary support for energy assistance programs. In contrast to effective metrics that assess the energy use and cost for low-income Americans—which are already being collected and should be used to inform budgets for energy assistance programs—utility-level disconnections metrics are poor indicators of Americans' need for energy assistance because disconnections are not directly correlated with ability to pay.¹⁷

¹⁴ U.S. Department of Health and Human Services, Administration for Children and Families. LIHEAP Performance Management, <u>Custom Report, Number of LIHEAP Recipient Households by Type of Assistance - National - Fiscal Year 2021.</u>

¹⁵ National Energy and Utility Affordability Coalition. <u>Maximize LIHEAP Funding in 2024: United States by the Numbers.</u> (2023)

¹⁶ National Community Action Partnership.

¹⁷ While we recognize the Joint Statement of Managers for the Consolidated Appropriations Act, 2023, requested EIA to allocate \$3 million of its fiscal year 2023 appropriation to conduct a monthly survey of electric and heating service providers of final termination notices, the Notice does not reference that request and relies exclusively on the EIA's general statutory authority (codified at 15 USC 772(b) and 42 USC 7101 *et seq*) for this proposed data collection.

As noted above, LIHEAP is the program the federal government provides electric and gas utility assistance, and state allocations are based – generally – on estimates of energy expenditures and are not based on suspensions due to non-payment of bills. As a result, without a change to the underlying statute or to the usual method of providing ongoing annual appropriations, data from the proposed Residential Utility Disconnection Survey will not be used to decide LIHEAP allocations. More specifically, such state-level allocations do not under any circumstances need utility-level data – on disconnections or otherwise.

Instead, a more effective alternative to "inform appropriate levels of budgetary support for various assistance programs across the United States" would be to leverage the Low Income Home Energy Data that HHS already has available. ¹⁸ The combination of information from EIA's periodic Residential Energy Consumption Survey (RECS), which EIA is currently collecting for its next publication in early 2026, the Bureau of the Census's Current Population Survey Annual Social and Economic Supplement, and the LIHEAP Reports to Congress, are used in the creation of the Low Income Home Energy Data report. ¹⁹ This report presents data on residential household consumption, expenditures, and energy burden for low-income households by heating and cooling type. Metrics that assess the energy use and cost for low-income Americans is a far more direct and comparable metric to determine the need for assistance for programs such as LIHEAP than utility-level disconnection data, which does not correlate with nor express the degree to which support is needed.

Proposed Survey Is Unnecessary and Burdensome

In the Notice, EIA specifically requested comments on whether "the proposed collection of information is necessary for the proper performance of agency functions, including whether the information will have a practical utility." EIA plays a critical role as our nation's independent and impartial energy information agency. However, the proposed information request is not only unnecessary, but also burdensome.

The Notice explains that proposed Form EIA-112 would be "an annual survey that collects information on the number of monthly natural gas and electric service final notices, disconnections, and reconnections for bill nonpayment across residential customers." The Notice further explains that the data collected in the proposed form "aims to better inform state and federal policy makers on utility disconnections by providing reliable data that can help inform appropriate levels of budgetary support for various assistance programs across the United States." As discussed in detail above, this misalignment of the proposed data collection and stated purpose makes the newly proposed data collection form unnecessary.

While Joint Commenters are supportive of ensuring policymakers, including those implementing LIHEAP, are well-informed on how best to disperse energy assistance program funds, the proposed data

¹⁸ U.S. Department of Health and Human Services, "Low Income Home Energy Data" (September 2021), <u>FY 2020</u> LIHEAP Home Energy Notebook (hhs.gov)

¹⁹ Residential Energy Consumption Survey (RECS) - Energy Information Administration (eia.gov).

collection will not further that goal in any meaningful way. For this reason, Joint Commenters do not believe that the proposed information collection will have any practical application sufficiently distinct from other ongoing reporting, rendering it generally useless and therefore unnecessary.

Furthermore, in addition to publishing aggregated data at the national and state level, EIA states that it also intends to publish survey results at the utility level. However, public disclosure of this data with this amount of granularity does not provide demonstrable value in assessing assistance needs at the state and federal decision-making levels, similarly rendering the proposed data collection unnecessary. Congress does not allocate funding for LIHEAP based on disconnect data and even the income data that LIHEAP does leverage is not at the utility level. Funding decisions are instead supported by state level income data.

Joint Commenters are also concerned about the burden that such reporting would place on impacted utilities. In fact, the proposed survey is especially burdensome for smaller utilities that have limited staff and resources. EIA estimates that 1,130 entities will have to complete the survey. EIA intends for the proposed form to be completed by those residential-serving utilities that also file Form EIA-176 (Annual Report of Natural and Supplemental Gas Supply and Disposition) and Form EIA-861 (Annual Electric Power Industry Report). EIA argues that its proposed form will minimize the burden of reporting by only requiring completion of Form EIA-112 for utilities "above a certain size threshold," such as exempting small electric utilities that receive Form EIA-861S (the short form of EIA-861). However, every single natural gas utility in the U.S. is required to complete Form EIA-176, meaning that no matter the size of the gas utility, including the hundreds of small, often community-owned utilities with 10 or less employees, all would be burdened with completing Form EIA-112. Similarly, some smaller public power and electric cooperative systems complete the Form EIA-861M and Form EIA-861 and would be impacted by this survey in both census and non-census years. The same applies for the hundreds of utilities impacted by this Notice that would be considered "small businesses" by size.

Survey Data Will Present Inaccurate Picture of Energy Assistance Need

In the proposed Form 112 survey, EIA seeks to collect final notices, disconnections, and reconnections for bill nonpayment across residential customers. However, the experience of the Joint Commenters' members highlights that EIA (and others seeking to utilize the data such as policymakers or the public) will face significant challenges in interpreting and analyzing the data to make reasonable determinations regarding assistance need and appropriate policies to address that need. Additional pieces of data would be needed to add context to the data points sought by EIA in this proposed survey, if it decides to continue collecting this data, before any meaningful analysis can be done – to include household income level and other economic data. Such additional data would need to be used in conjunction with the data collected as part of this proposed survey before sound conclusions about assistance need could be drawn as it pertains to utility final notices, disconnections and reconnections for bill nonpayment.

Simply put, there are a variety of non-utility and non-consumer variables that impact the on-time nature of bill payments and therefore the necessary data points for policymakers to potentially assess assistance need that EIA should thoughtfully consider as it determines the purpose and need of this survey. In our members' experience, final notices before a disconnection do not necessarily mean a consumer needs assistance. For example, the Joint Commenters' members highlight the following examples of non-utility and non-consumer variables that impact bill payments:

- There has been a notable uptick in recent months of U.S. Postal Service (USPS) delivery streams being interrupted, leading to delays in utilities receiving bill payments from consumers and in some cases, consumers are receiving their "final notices" <u>before</u> their original monthly bills arrive in their mailboxes. This trend has increased recently but historically has been observed by the utilities annually during the heightened holiday shopping season in November and December when mail delivery systems are inundated. These occurrences are outside the utilities' control, though they work diligently with USPS and their business vendors to investigate and correct these issues as quickly as possible.
- Some utilities serve territories with disproportionately high segments of transitory populations, which could include college campuses, military installations, and other facilities that yield high account turnovers. Disconnections and then subsequent reconnections of these accounts do not in and of themselves reflect assistance need.
- Similarly, some utilities may serve areas with a high percentage of vacation homes or residences only used on a seasonal basis. Our members' experience reflects that at the end of a season some of these consumers choose to simply let their accounts be disconnected rather than informing the utility ahead of time that they will not be utilizing service for a period. In these cases, disconnections (followed by reconnections the next season) do not reflect assistance need.

As these examples illustrate, there are a variety of factors that contribute to the reasons that consumers receive final notices, disconnections and reconnections and several of these are not related to financial need, which is a pre-requisite for LIHEAP and other energy assistance programs (as discussed in an earlier section).

On the other hand, states and utilities have a variety of seasonal disconnect policies, including moratoria during certain seasons for disconnections and protections for consumers with specific medical needs, and these policies can mask the growing needs for assistance.²⁰ For example, utility customers in Arizona are protected from disconnection between June 1 and October 15 and when the temperature exceeds 95 degrees Fahrenheit. New York, on the other hand, does not have any warm weather protections, but has

²⁰ U.S. Department of Health and Human Services, Administration for Children and Families. LIHEAP Clearinghouse, <u>Disconnect Policies</u> (July 2024)

cold weather protections from November 1 – April 15. This example illustrates the complexity of using the data as EIA proposes to inform assistance need.

Conclusion

In summary, we urge EIA to forgo the proposed survey because the data requested is unnecessary, burdensome, and does not align with the Notice's stated purpose of informing federal and state energy assistance programs. LIHEAP is a critical program for utility customers in need of bill assistance that is not adequately funded. The federal government has all the information it needs to assess energy assistance needs. The real issue is sufficient appropriations for LIHEAP.

Please reach out to the Joint Commenters with any questions you may have regarding our letter. We appreciate EIA's thoughtful consideration of our comments.

Sincerely,

The American Public Gas Association
The American Public Power Association
The National Rural Electric Cooperative Association

Contacts:

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Appendix B:

Table 1: Public Power Utilities Subject to Form 861

Utilities with under 200,000 MWh in sales are highlighted in yellow.

Utilities with serving an estimated population of under 50,000 are highlighted in blue.

EIA Utility Number	Utility Name	State	Residential Customers	Total Customers	Total Sales (MWh)	Estimated Population
66058	Ticaboo Electric Improvement District	UT	50	54	521	125
66062	Shelter Cove Resort Improvement Dist No. 1	CA	595	640	4,065	1,488
66052	Kirkwood Meadows PUD	CA	631	755	7,122	1,578
15349	City of Preston	IA	454	598	7,199	1,135
10508	Village of L'Anse - (MI)	MI	946	1,133	11,269	2,365
6424	Florence Utility Comm	WI	1,390	1,596	15,344	3,475
8548	City of Hickman	KY	837	1,063	15,637	2,093
10596	City of Lake Crystal - (MN)	MN	1,064	1,241	16,627	2,660
4604	City of Crystal Falls	MI	1,392	1,691	16,770	3,480
4607	City of Cuba City	WI	973	1,122	17,109	2,433
1196	Village of Baraga - (MI)	MI	550	786	17,645	1,375
9124	Hustisford Utilities	WI	1,319	1,599	18,309	3,298
13352	City of Negaunee	MI	1,964	2,248	21,053	4,910
40364	City of Courtland	AL	547	760	21,540	1,368
13826	City of Norway	MI	1,853	2,096	22,149	4,633
11458	City of Macon - (MS)	MS	899	1,181	22,832	2,248
13438	Village of New Glarus - (WI)	WI	1,090	1,306	22,923	2,725
3475	City of Chickamauga	GA	828	969	23,449	2,070
20434	City of Westby	WI	1,033	1,251	24,270	2,583
13965	Oconto Falls Water & Light Comm	WI	1,363	1,671	25,556	3,408
11125	City of Lodi - (WI)	WI	1,486	1,788	27,531	3,715
5551	City of Eagle River - (WI)	WI	1,046	1,578	29,393	2,615
7265	City of Gladstone	MI	2,539	2,883	31,392	6,348
20583	Whitehall Electric Utility	WI	781	971	32,244	1,953
20182	Waterloo Light & Water Comm	WI	1,636	1,957	32,932	4,090
307	Algoma Utility Comm	WI	1,656	2,039	33,413	4,140
2273	Brodhead Water & Lighting Comm	WI	1,556	1,870	33,615	3,890
25866	Ak-Chin Electric Utility Authority	AZ	319	466	39,656	798

13448	City of New Holstein - (WI)	WI	2,252	2,715	40,073	5,630
1997	City of Boscobel - (WI)	WI	1,425	1,762	41,510	3,563
17324	Slinger Utilities	WI	2,521	2,968	42,275	6,303
9936	Juneau Utility Comm	WI	941	1,141	43,598	2,353
6840	City of Fulton - (KY)	KY	1,184	1,608	47,639	2,960
15312	Village of Prairie Du Sac - (WI)	WI	1,909	2,210	49,724	4,773
1776	City of Black River Falls	WI	2,255	2,811	53,323	5,638
14537	Pascoag Utility District	RI	4,361	4,964	53,748	10,903
13145	Village of Muscoda - (WI)	WI	933	1,143	56,589	2,333
13036	Village of Mt. Horeb - (WI)	WI	3,667	4,192	57,485	9,168
19149	City of Trenton - (TN)	TN	1,945	2,447	61,135	4,863
20176	City of Water Valley - (MS)	MS	1,534	2,079	61,324	3,835
18472	City of Tarrant	AL	2,100	2,731	62,778	5,250
18206	Strawberry Electric Serv Dist	UT	3,592	4,070	63,192	8,980
19896	City of Volga - (SD)	SD	1,058	1,250	63,791	2,645
18087	Town of Sterling - (MA)	MA	3,600	4,077	64,882	9,000
1582	City of Benton - (KY)	KY	1,874	2,558	66,311	4,685
10605	Lake Mills Light & Water	WI	4,040	4,517	66,577	10,100
11611	City of Maquoketa - (IA)	ΙA	2,811	3,428	66,778	7,028
6043	City of Evansville	WI	3,937	4,596	68,417	9,843
4073	City of Columbus - (WI)	WI	2,453	2,895	73,023	6,133
9230	City of Independence - (IA)	IA	2,717	3,196	76,334	6,793
11477		ME	2,384.0	2,633.0	77,455.0	5,960
19324	Two Rivers Water & Light	WI	5,591	6,311	80,906	13,978
14078	City of Okolona	MS	4,237	5,383	84,196	10,593
19307	City of Tuscumbia	AL	4,086	4,981	91,061	10,215
9690	Jefferson Utilities	WI	3,720	4,298	94,834	9,300
13437	City of Newbern	TN	1,502	1,841	102,316	3,755
14947	City of Philadelphia - (MS)	MS	2,685	3,843	102,694	6,713
3208	Cedarburg Light & Water Comm	WI	5,914	6,857	104,409	14,785
11475	City of Madison - (SD)	SD	2,793	3,298	104,925	6,983
571	City of Amory	MS	2,754	3,929	105,611	6,885
20213	Waupun Utilities	WI	3,913	4,504	106,366	9,783
13481	City of New Richmond	WI	4,855	5,584	109,718	12,138
15978	City of Richland Center - (WI)	WI	2,430	2,944	109,938	6,075
20394	City of West Point - (MS)	MS	2,981	3,861	111,236	7,453

17452	City of Smithville - (TN)	TN	2,369	2,991	111,452	5,923
11871	City of Mayfield Plant Board	KY	4,327	5,186	112,777	10,818
8883	Houlton Water Company	ME	3,907.0	5,496.0	116,074.0	9,768
16459	City of Russellville - (KY)	KY	3,129	4,162	118,315	7,823
17740	City of Sparta	TN	2,250	3,081	118,441	5,625
49998	City of Berea Municipal Utility	KY	4,669	5,309	119,680	11,673
11247	Louisville Electric System	MS	2,454	3,456	128,403	6,135
16458	City of Russellville - (AL)	AL	3,965	5,105	129,098	9,913
16082	City of River Falls	WI	6,552	7,339	130,192	16,380
20211	Village of Waunakee - (WI)	WI	6,497	7,354	133,138	16,243
4390	City of Corona - (CA)	CA	1,286	2,773	133,745	3,215
18181	City of Stoughton - (WI)	WI	8,177	9,232	137,230	20,443
13039	City of Mt Pleasant - (TN)	TN	3,495	4,255	139,098	8,738
8226	City of Hartselle	AL	4,519	5,713	145,128	11,298
2008	City of Boulder City - (NV)	NV	7,124	8,056	145,874	17,810
18249	City of Sturgeon Bay - (WI)	WI	7,612	9,446	146,339	19,030
20077	City of Wapakoneta - (OH)	ОН	4,955	5,594	152,408	12,388
40429	American Samoa Power Authority	AS	10,903	12,496	156,231	27,258
9697	City of Jellico	Multi- State	3,391.0	4,416.0	156,288.0	8,478
27222	City of Ripley - (TN)	TN	5,109	6,620	157,123	12,773
6008	City of Etowah	TN	4,408	5,303	158,657	11,020
1456	Town of Bedford - (VA)	VA	5,944	6,918	165,468	14,860
12186	McMinnville Electric System	TN	6,565	8,219	166,258	16,413
15040	City of Pierre - (SD)	SD	6,145	7,343	167,998	15,363
20793	City of Winchester - (TN)	TN	5,232	6,770	170,464	13,080
13523	City of Newberry - (SC)	SC	4,506	5,457	171,542	11,265
13467	New London Electric&Water Util	WI	3,504	4,078	174,658	8,760
12532	City of Milan - (TN)	TN	6,814	8,390	175,076	17,035
17891	City of St Marys - (OH)	OH	3,758	4,264	176,034	9,395
123	City of Adel- (GA)	GA	2,296	2,865	176,598	5,740
8748	City of Holly Springs	MS	9,193	11,897	177,654	22,983
10210	Ketchikan Public Utilities	AK	6,559	7,949	178,130	16,398

690	City of Bardstown - (KY)	KY	3,447	4,811	178,320	8,618
2411	City of Brownsville	TN	4,104	5,403	180,789	10,260
55	City of Aberdeen - (MS)	MS	2,571	3,303	181,860	6,428
10370	City of Kirkwood - (MO)	MO	9,077	10,324	183,329	22,693
6205	City of Farmington - (MO)	МО	7,025	8,159	188,298	17,563
1578	Benton County	TN	8,648	10,519	191,666	21,620
5336	City of Dover - (OH)	ОН	5,850	6,868	195,091	14,625
5961	Town of Erwin - (TN)	TN	7,677	9,091	195,099	19,193
6718	City of Franklin - (KY)	KY	4,497	5,742	200,665	11,243
3824	Clyde Light & Power	OH	2,768	3,126	200,737	6,920
9023	City of Humboldt	TN	3,488	4,549	201,894	8,720
18252	City of Sturgis - (MI)	MI	6,063	7,121	201,900	15,158
416	City of Altus - (OK)	OK	9,138	10,284	202,230	22,845
13482	New River Light & Power Co	NC	7,186	8,973	204,986	17,965
2089	Bozrah Light & Power Company	СТ	2,427	2,819	205,481	6,068
14381	City of Painesville	ОН	10,818	12,655	208,422	27,045
2487	City of Buford	GA	2,939	3,959	210,611	7,348
2643	Butler Public Power District - (NE)	NE	4,745	6,482	211,699	11,863
18466	Town of Tarboro - (NC)	NC	5,477	6,442	211,746	13,693
11811	Town of Massena - (NY)	NY	8,174	9,341	212,060	20,435
13679	Town of North Attleborough - (MA)	MA	12,576	13,850	212,213	31,440
7270	City of Glasgow - (KY)	KY	5,684	7,562	212,247	14,210
11586	Town of Mansfield - (MA)	MA	9,385	10,553	212,739	23,463
17692	Southwest Public Power Dist	NE	2,169	6,326	213,262	5,423
8973	Town of Hudson - (MA)	MA	11,405	13,421	213,662	28,513
3705	Clarksville Connected Utilities	AR	3,798	4,549	213,761	9,495
12782	City of Monett - (MO)	MO	4,003	4,761	214,376	10,008
1936	Bolivar Energy Authority	TN	8,921	11,361	215,289	22,303
8840	City of Hope - (AR)	AR	5,814	6,901	215,377	14,535
17896	City of Shasta Lake - (CA)	CA	4,272	4,605	215,741	10,680
14275	City of Oxford - (MS)	MS	8,355	10,300	216,465	20,888
17577	City of South Sioux City	NE	5,125	6,373	220,878	12,813
11085	Town of Littleton - (MA)	MA	6,695	7,540	221,307	16,738
13963	Oconomowoc Utilities	WI	9,796	11,188	221,437	24,490
6149	City of Ellensburg - (WA)	WA	9,011	10,582	221,650	22,528
4437	City of Covington - (TN)	TN	3,671	4,632	222,278	9,178

21013	City of Worthington - (MN)	MN	4,654	5,531	223,063	11,635
6894	City of Gaffney - (SC)	SC	6,285	7,637	223,720	15,713
55787	City of Moreno Valley - (CA)	CA	6,946	7,955	223,766	17,365
14839	City of Peru - (IN)	IN	9,169	10,751	225,079	22,923
8055	City of Hannibal - (MO)	МО	7,567	8,821	225,574	18,918
6638	City of Fountain	CO	16,882	17,893	225,613	42,205
12540	City of Milford - (DE)	DE	6,954	8,433	228,636	17,385
13602	City of Niles - (OH)	OH	12,119	13,056	229,893	30,298
15804	Reedsburg Utility Comm	WI	4,716	5,432	233,118	11,790
5625	Easton Utilities Comm	MD	8,602	11,002	234,176	21,505
14840	City of Peru - (IL)	IL	4,719	5,906	234,339	11,798
11318	City of Lumberton - (NC)	NC	9,516	11,568	235,448	23,790
20813	City of Winfield - (KS)	KS	6,303	7,589	235,733	15,758
4671	Custer Public Power District	NE	4,707	11,040	237,662	11,768
20310	Town of Wellesley - (MA)	MA	9,372	10,596	238,467	23,430
10967	City of Lexington - (NE)	NE	3,711	4,591	238,830	9,278
19784	Vera Irrigation District #15	WA	12,154	13,509	239,014	30,385
18384	City of Sweetwater	TN	7,455	9,700	239,769	18,638
1050	City of Azusa	CA	14,935	16,917	241,341	37,338
9613	City of Lebanon - (IN)	IN	7,892	9,134	241,462	19,730
3216	City of Celina - (OH)	OH	7,205	8,113	243,245	18,013
6775	Village of Freeport - (NY)	NY	13,322	15,175	243,560	33,305
7827	Guntersville Electric Board	AL	4,799	6,798	243,871	11,998
13138	City of Murray - (KY)	KY	6,185	7,959	245,060	15,463
7651	Greenwood Utilities Comm	MS	7,343	9,065	251,735	18,358
8147	City of Harriman - (TN)	TN	9,277	11,218	251,825	23,193
11488	Madisonville Municipal Utils	KY	6,895	8,410	252,026	17,238
10832	City of Lebanon - (MO)	МО	5,988	7,400	253,458	14,970
12478	Town of Middletown - (DE)	DE	8,962	10,013	253,892	22,405
20862	Wisconsin Rapids W W & L Comm	WI	12,402	14,530	253,968	31,005
6610	City of Fort Morgan	CO	5,853	7,005	256,794	14,633
20142	City of Washington - (NC)	NC	11,486	14,178	257,522	28,715
11701	City of Marquette - (MI)	MI	15,001	17,128	260,130	37,503
15048	Electrical Dist No2 Pinal County	AZ	5,123	6,124	260,397	12,808

9130	Hutchinson Utilities Comm	MN	6,615	7,619	260,465	16,538
15159	City of Plymouth - (WI)	WI	7,211	8,544	260,598	18,028
4617	Cullman Power Board	AL	6,944	8,958	260,979	17,360
57105	Commonwealth Utility Corporation - (MP)	MP	13,027	17,283	261,974	32,568
19951	City of Wadsworth - (OH)	ОН	12,198	13,820	263,697	30,495
1640	City of Bessemer Utilities	AL	9,439	11,223	263,965	23,598
3295	City of Centralia - (WA)	WA	9,015	10,701	265,359	22,538
9087	Town of Huntersville - (NC)	NC	7,651	8,413	265,514	19,128
21048	Wyandotte Municipal Serv Comm	MI	11,675	12,775	267,164	29,188
20737	Willmar Municipal Utilities	MN	8,658	10,164	267,193	21,645
691	City of Anoka	MN	11,546	12,878	268,801	28,865
232	City of Albemarle - (NC)	NC	10,713	13,039	271,488	26,783
19266	Tullahoma Board-Public Utils	TN	9,190	11,180	271,988	22,975
3113	City of Carthage - (MO)	MO	6,983	8,122	272,630	17,458
6582	City of Forest Grove	OR	10,278	11,226	272,697	25,695
17011	Shawano Municipal Utilities	WI	4,920	6,044	273,320	12,300
17127	Town of Shrewsbury - (MA)	MA	15,089	16,445	273,566	37,723
13228	City of Natchitoches	LA	7,327	8,501	273,866	18,318
3205	Cedar-Knox Public Power Dist	NE	5,537	7,646	274,066	13,843
9667	City of Jasper - (IN)	IN	6,436	7,765	274,691	16,090
13831	City of Norwich - (CT)	CT	18,748	20,808	276,305	46,870
1896	City of Bluffton - (IN)	IN	4,946	5,978	277,488	12,365
7483	City of Grand Haven - (MI)	MI	13,073	14,955	278,213	32,683
15095	City of Piqua - (OH)	ОН	9,707	10,803	278,430	24,268
2194	City of Brenham - (TX)	TX	5,974	7,349	279,399	14,935
7646	Greenwood CPW	SC	11,670	14,653	279,617	29,175
16223	City of Rockwood - (TN)	TN	11,964	15,303	280,478	29,910
2010	City of Bountiful	UT	15,652	17,300	280,482	39,130
1581	City of Benton - (AR)	AR	12,947	14,751	280,819	32,368
3647	City of Claremore	OK	11,655	13,128	282,630	29,138
17184	City of Siloam Springs - (AR)	AR	8,048	9,234	286,562	20,120
295	City of Alexandria - (MN)	MN	8,682	10,613	286,769	21,705
17829	City of Springfield - (TN)	TN	7,490	8,952	286,899	18,725
5480	Town of Danvers	MA	11,509	13,395	287,208	28,773

8212	Hartford Electric	WI	6,922	7,907	287,790	17,305
16463	City of Ruston - (LA)	LA	9,690	11,618	288,152	24,225
14194	City of Orrville - (OH)	НО	6,310	7,116	288,840	15,775
17845	City of Springville - (UT)	UT	10,701	12,179	288,906	26,753
17732	Spanish Fork City Corporation	UT	13,228	15,268	289,314	33,070
3355	City of Chanute	KS	4,583	5,598	289,883	11,458
5760	City of Elizabeth City - (NC)	NC	11,242	13,374	290,043	28,105
13725	City of North Platte	NE	11,799	13,973	290,046	29,498
4920	City of Dayton - (TN)	TN	8,922	11,223	290,703	22,305
18312	Sun Prairie Utilities	WI	16,436	18,263	291,977	41,090
6709	Easley Combined Utility System	SC	15,381	17,011	293,208	38,453
12473	Town of Middleborough - (MA)	MA	15,269	17,911	300,989	38,173
7908	Hagerstown Light Department	MD	15,054	17,682	301,558	37,635
1366	City of Bay City - (MI)	MI	17,982	20,343	302,593	44,955
6612	Fort Payne Improvement Authority	AL	6,880	8,937	303,086	17,200
6941	City of Garden City	KS	10,348	11,867	306,172	25,870
12944	City of Morganton - (NC)	NC	7,029	8,841	306,730	17,573
16259	City of Rolla - (MO)	МО	8,050	9,588	307,109	20,125
19430	City of Union City	TN	5,194	6,462	307,355	12,985
13839	City of Norwood - (MA)	MA	13,599	15,779	307,994	33,998
13144	City of Muscle Shoals	AL	7,057	8,883	308,783	17,643
1300	City of Bartow - (FL)	FL	11,044	12,849	310,054	27,610
604	City of Andalusia	AL	3,616	4,683	310,402	9,040
10960	City of Lewisburg - (TN)	TN	4,909	6,503	312,538	12,273
3329	Borough of Chambersburg	PA	9,798	11,639	313,435	24,495
2144	Town of Braintree - (MA)	MA	14,027	16,752	313,791	35,068
16829	City of Scottsboro - (AL)	AL	7,012	8,665	314,180	17,530
14324	PUD No 2 of Pacific County	WA	16,294	18,338	315,430	40,735
19125	City of Traverse City - (MI)	МІ	9,798	13,139	316,718	24,495
5325	City of Douglas	GA	4,103	5,892	316,876	10,258
2548	City of Burlington Electric - (VT)	VT	17,620	21,586	318,319	44,050
13412	City of New Albany - (MS)	MS	8,086	11,250	318,651	20,215
19882	Virginia Tech Electric Service	VA	5,738	6,913	319,717	14,345
8884	Terrebonne Parish Consol Gov't	LA	11,009	13,826	322,643	27,523

12351	City of Mesa - (AZ)	AZ	15,020	17,787	323,639	37,550
10800	City of Lawrenceville - (GA)	GA	10,351	12,175	324,018	25,878
994	City of Auburn - (IN)	IN	6,761	7,839	324,580	16,903
2285	City of Brookings - (SD)	SD	10,227	11,954	326,271	25,568
15229	City of Poplar Bluff - (MO)	МО	7,751	9,608	326,340	19,378
5780	Elkhorn Rural Public Pwr Dist	NE	6,120	10,124	327,485	15,300
4003	City of Colton - (CA)	CA	17,135	19,509	328,423	42,838
1009	City of Austin - (MN)	MN	10,775	11,994	328,525	26,938
5773	City of Elk River	MN	11,558	13,232	329,773	28,895
16558	City of Salem - (VA)	VA	11,268	13,426	330,792	28,170
8846	City of Hopkinsville	KY	9,809	12,878	330,798	24,523
4068	City of Columbus - (MS)	MS	8,943	12,664	332,127	22,358
7222	City of Gillette - (WY)	WY	13,933	16,646	335,368	34,833
10830	City of Lebanon - (OH)	ОН	8,683	9,796	336,284	21,708
15202	City of Ponca City - (OK)	OK	13,803	15,891	337,295	34,508
16900	City of Seguin - (TX)	TX	8,127	9,526	340,571	20,318
17047	City of Shelbyville - (TN)	TN	9,560	11,417	342,089	23,900
13739	Northeast Power	NE	6,798	8,550	345,558	16,995
17177	City of Sikeston - (MO)	MO	7,048	8,747	345,634	17,620
20481	City of Westfield - (MA)	MA	16,207	18,311	347,408	40,518
207	Alameda Municipal Power	CA	32,803	37,050	349,667	82,008
2812	City of Calhoun - (GA)	GA	4,444	5,695	349,995	11,110
7627	City of Greenfield - (IN)	IN	11,580	12,644	350,501	28,950
20382	City of West Memphis - (AR)	AR	10,139	11,843	352,663	25,348
7096	City of Geneva- (IL)	IL	8,630	10,215	357,514	21,575
13547	Newnan Wtr, Sewer & Light Comm	GA	8,995	10,830	358,386	22,488
6707	City of Frankfort - (IN)	IN	7,785	9,430	359,390	19,463
11740	City of Marshfield - (WI)	WI	11,924	13,946	363,252	29,810
4508	Crawfordsville Elec, Lgt & Pwr	IN	8,568	10,175	363,405	21,420
5509	City of Dyersburg	TN	9,498	12,084	370,972	23,745
8774	City of Holyoke - (MA)	MA	14,092	17,012	374,081	35,230
10966	City of Lexington - (NC)	NC	17,769	20,031	377,723	44,423
16179	Rochelle Municipal Utilities	IL	6,298	7,443	378,547	15,745
11560	City of Manassas - (VA)	VA	14,405	16,611	381,856	36,013
10579	City of LaFollette	TN	19,844	23,160	382,660	49,610
4683	City of Cuyahoga Falls - (OH)	ОН	24,241	26,707	382,759	60,603
21111	Perennial Public Power Dist	NE	4,119	7,658	382,851	10,298

719	Town of Apex- (NC)	NC	26,550	28,431	385,106	66,375
4538	Crisp County Power Comm	GA	9,286	12,189	385,175	23,215
13137	City of Murray - (UT)	UT	16,667	19,913	387,680	41,668
59013	PUD No 1 of Jefferson County	WA	18,127	20,873	391,951	45,318
6427	City of Floresville	TX	15,487	17,573	391,996	38,718
20187	Watertown Municipal Utilities	SD	11,339	13,993	394,101	28,348
15231	City of Port Angeles - (WA)	WA	9,306	11,018	396,839	23,265
7679	City of Griffin - (GA)	GA	13,685	16,081	400,203	34,213
7716	Groton Dept of Utilities - (CT)	СТ	12,240	13,850	400,661	30,600
1325	City of Batavia - (IL)	IL	9,944	11,317	402,329	24,860
9645	Jamestown Board of Public Util	NY	16,088	18,875	402,379	40,220
14246	City of Owatonna - (MN)	MN	11,182	12,235	402,683	27,955
14245	Overton Power District No 5	NV	15,228	18,084	403,363	38,070
10968	City of Lexington - (TN)	TN	17,826	23,249	411,112	44,565
13519	City of Newark - (DE)	DE	11,845	13,377	411,986	29,613
3400	City of Chaska - (MN)	MN	10,151	11,259	413,498	25,378
5930	Village of Fairport - (NY)	NY	16,341	17,990	414,515	40,853
10345	City of Kinston - (NC)	NC	9,934	11,874	416,597	24,835
8245	City of Hastings - (NE)	NE	11,409	13,858	417,397	28,523
18022	City of Statesville - (NC)	NC	12,857	15,459	418,139	32,143
7654	Greer Commission of Public Wks	SC	21,216	32,896	420,036	53,040
15507	City of Pulaski - (TN)	TN	12,360	15,217	420,479	30,900
11135	City of Logan - (UT)	UT	19,239	21,541	424,797	48,098
21158	City of Zeeland - (MI)	MI	5,963	6,954	427,027	14,908
18006	City of Starkville	MS	12,678	14,480	427,878	31,695
4373	Cornhusker Public Power Dist	NE	7,362	10,356	427,971	18,405
3477	City of Chicopee - (MA)	MA	23,470	26,438	429,091	58,675
12894	City of Moorhead - (MN)	MN	18,024	20,286	429,144	45,060
58124	City of Winter Park - (FL)	FL	12,096	14,632	429,922	30,240
11142	City of Logansport - (IN)	IN	11,175	12,596	431,791	27,938
5582	City of East Point - (GA)	GA	16,142	17,670	431,877	40,355
18125	Stillwater Utilities Authority	OK	19,616	22,150	433,930	49,040
2248	Bristol Virginia Utilities	VA	13,566	16,401	434,673	33,915
20230	Weatherford Mun Utility System	TX	13,875	16,331	435,305	34,688

11124	City of Lodi - (CA)	CA	23,449	25,637	435,990	58,623
14146	City of Opelika - (AL)	AL	12,965	15,284	438,376	32,413
10393	PUD No 1 of Klickitat County	WA	11,803	14,111	441,885	29,508
16971	Shakopee Public Utilities Comm	MN	17,736	19,706	442,969	44,340
13416	City of New Bern - (NC)	NC	20,864	24,527	443,589	52,160
20477	City of Westerville - (OH)	ОН	15,711	17,942	447,081	39,278
10879	Lehi City Corporation	UT	26,342	28,924	448,504	65,855
6234	City of Fayetteville	TN	16,546	19,268	449,024	41,365
20228	Weakley County Mun Elec Sys	TN	15,380	20,751	449,131	38,450
19225	City of Troy - (AL)	AL	7,828	9,458	449,166	19,570
13485	New Smyrna Beach City of	FL	27,453	31,035	452,177	68,633
4433	City of Covington - (GA)	GA	11,846	13,822	453,223	29,615
14605	City of Peabody - (MA)	MA	22,369	26,874	465,645	55,923
3075	Carroll County - (TN)	TN	12,280	15,486	466,930	30,700
17860	City of St Charles - (IL)	IL	14,070	16,346	471,666	35,175
3915	Coldwater Board of Public Util	MI	6,189	7,701	472,776	15,473
10799	City of Lawrenceburg	TN	17,940	21,652	475,034	44,850
13933	City of Oak Ridge	TN	15,155	17,459	479,788	37,888
11204	Los Alamos County	NM	8,367	9,275	480,239	20,918
18917	Tillamook Peoples Utility Dist	OR	19,940	22,230	485,975	49,850
2054	City of Bowling Green - (OH)	ОН	12,947	14,752	493,325	32,368
40438	Columbia River Peoples Ut Dist	OR	16,122	17,226	494,786	40,305
18848	City of Thomasville - (GA)	GA	14,129	16,640	496,160	35,323
5763	City of Elizabethton - (TN)	TN	23,254	26,937	498,614	58,135
10620	City of Lake Worth Beach - (FL)	FL	24,417	27,735	498,655	61,043
40437	Emerald People's Utility Dist	OR	19,583	22,503	501,002	48,958
10868	City of Leesburg - (FL)	FL	23,802	28,973	501,973	59,505
8449	Henderson City Utility Comm	KY	10,320	11,965	503,939	25,800
40441	Town of Murphy - (NC)	NC	3,656	5,355	505,159	9,140
12312	Merced Irrigation District	CA	11,089	12,816	505,763	27,723
6779	City of Fremont - (NE)	NE	13,845	16,355	508,841	34,613
12298	City of Menasha - (WI)	WI	8,568	9,430	509,377	21,420
28604	Kerrville Public Utility Board	TX	20,070	24,105	509,727	50,175

11571	Manitowoc Public Utilities	WI	16,117	18,499	514,574	40,293
15145	City of Plattsburgh - (NY)	NY	8,834	10,197	515,462	22,085
11731	City of Marshall - (MN)	MN	5,842	6,901	517,612	14,605
13550	City of Newport - (TN)	TN	19,810	23,350	517,879	49,525
14371	City of Paducah - (KY)	KY	18,885	22,736	518,735	47,213
10585	City of La Grange - (GA)	GA	11,917	13,823	519,003	29,793
14455	City of Paris - (TN)	TN	16,119	22,476	519,601	40,298
12674	City of Mishawaka	IN	24,834	28,629	532,343	62,085
4294	City of Cookeville - (TN)	TN	15,579	19,410	533,080	38,948
7634	City of Greenville - (TX)	TX	14,508	16,730	539,455	36,270
20038	Town of Wallingford - (CT)	СТ	21,370	25,048	540,590	53,425
17512	Village of Solvay - (NY)	NY	4,711	5,212	541,613	11,778
20140	City of Washington - (GA)	GA	1,860	2,232	562,105	4,650
14446	Paragould Light & Water Comm	AR	12,422	14,317	564,143	31,055
19273	City of Tupelo - (MS)	MS	10,549	15,683	565,408	26,373
18397	City of Sylvania - (GA)	GA	1,818	2,250	565,882	4,545
3939	City of College Park - (GA)	GA	7,673	8,684	566,774	19,183
11222	Loudon Utilities Board	TN	12,315	14,221	571,698	30,788
3108	City of Cartersville - (GA)	GA	6,622	8,080	573,963	16,555
10056	City of Kaukauna	WI	14,255	16,226	583,469	35,638
6616	Fort Pierce Utilities Authority	FL	23,905	29,233	592,809	59,763
3203	Cedar Falls Utilities	ΙA	17,568	20,017	593,487	43,920
4911	Dawson Power District	NE	16,023	23,408	600,681	40,058
8795	City of Homestead - (FL)	FL	23,540	26,257	606,588	58,850
7977	City of Hamilton - (OH)	ОН	26,823	29,735	614,860	67,058
577	City of Alcoa Utilities	TN	27,394	31,956	619,089	68,485
947	Athens Utility Board	TN	11,553	14,012	624,806	28,883
18488	City of Taunton	MA	34,979	40,152	627,545	87,448
6708	City of Frankfort - (KY)	KY	16,752	21,362	631,055	41,880
241	Albertville Municipal Utilities Board	AL	8,218	10,602	631,869	20,545
14055	PUD No 1 of Okanogan County	WA	18,015	22,018	633,607	45,038
15748	Town of Reading - (MA)	MA	27,217	30,483	635,289	68,043
298	City of Alexandria - (LA)	LA	19,883	23,728	647,066	49,708
19879	Virgin Islands Water & Power Authority	VI	44,216	54,432	648,916	110,540
28978	City of San Marcos - (TX)	TX	22,014	25,723	652,265	55,035

3644	PUD No 1 of Clallam County	WA	30,390	33,931	665,293	75,975
19856	City of Vineland - (NJ)	NJ	22,676	25,947	669,315	56,690
17874	City of St George	UT	28,025	33,138	670,251	70,063
554	City of Ames - (IA)	ΙA	24,832	27,940	670,904	62,080
12801	City of Monroe - (NC)	NC	9,896	12,193	678,583	24,740
8198	City of Harrisonburg - (VA)	VA	18,037	21,651	683,258	45,093
9616	Beaches Energy Services	FL	30,377	35,978	692,651	75,943
16226	City of Rocky Mount - (NC)	NC	25,217	29,196	692,941	63,043
1586	City of Bentonville - (AR)	AR	24,169	27,802	693,216	60,423
17033	Sheffield Utilities	AL	15,577	19,433	694,528	38,943
14653	PUD No 1 of Pend Oreille County	WA	9,064	10,008	695,193	22,660
15419	PUD No 3 of Mason County	WA	33,576	35,985	695,379	83,940
5335	City of Dover - (DE)	DE	21,406	24,900	702,260	53,515
11256	City of Loveland - (CO)	CO	35,990	41,268	703,605	89,975
7027	City of Gastonia - (NC)	NC	26,404	30,722	706,593	66,010
16637	City of Sandersville - (GA)	GA	2,231	2,806	714,617	5,578
15783	City of Redding - (CA)	CA	38,200	44,536	715,207	95,500
3855	Columbia Power System - (TN)	TN	30,374	35,567	716,953	75,935
12187	City of McMinnville - (OR)	OR	16,614	19,436	718,012	41,535
40606	City of Grand Island - (NE)	NE	22,093	26,744	726,695	55,233
14164	City of Orangeburg - (SC)	SC	20,597	24,524	743,985	51,493
10226	Utility Board of the City of Key West, F	FL	27,180	31,780	756,529	67,950
17839	City of Springfield - (OR)	OR	29,457	32,655	760,466	73,643
14268	City of Owensboro - (KY)	KY	23,236	26,630	762,417	58,090
15444	Provo City Corp	UT	36,258	40,894	768,557	90,645
6923	City of Gallatin - (TN)	TN	21,790	25,326	770,673	54,475
11789	Maryville Utilities	TN	19,826	22,947	771,912	49,565
9187	City of Idaho Falls - (ID)	ID	27,097	31,688	782,638	67,743
3812	City of Clinton - (TN)	TN	25,968	30,946	782,985	64,920
7129	City of Georgetown - (TX)	TX	29,677	32,823	789,274	74,193
3892	City of Coffeyville - (KS)	KS	4,736	5,755	806,282	11,840
5148	City of Dickson	TN	30,379	38,376	812,058	75,948
11187	City of Longmont	CO	40,386	43,268	816,005	100,965

14401	City of Palo Alto - (CA)	CA	26,220	29,854	822,107	65,550
16195	City of Rock Hill - (SC)	SC	36,837	40,767	828,610	92,093
230	Albany Utility Board	GA	28,612	33,109	832,046	71,530
2056	City of Bowling Green - (KY)	KY	26,746	32,045	840,935	66,865
2247	City of Bristol - (TN)	TN	29,384	34,211	842,447	73,460
636	City of Anderson - (IN)	IN	30,466	34,785	846,822	76,165
4065	City of Columbus - (OH)	OH	15,038	18,607	848,217	37,595
13143	Board of Water Electric & Communications	IA	10,122	11,695	853,667	25,305
15989	City of Richmond - (IN)	IN	16,373	21,355	856,011	40,933
30518	Electrical Dist No3 Pinal County	AZ	28,126	30,420	870,847	70,315
12988	City of Morristown - (TN)	TN	13,321	16,321	882,504	33,303
4280	Conway Corporation	AR	30,307	33,522	885,038	75,768
4794	City of Danville - (VA)	VA	37,583	42,745	887,268	93,958
13718	City of North Little Rock - (AR)	AR	34,724	39,873	888,186	86,810
4150	City of Concord - (NC)	NC	29,058	33,425	889,196	72,645
13314	Navajo Tribal Utility Authority	Multi- State	39,087	43,762	896,184	97,718
6204	City of Farmington - (NM)	NM	35,824	44,935	909,139	89,560
5309	City of Dothan - (AL)	AL	26,503	31,893	923,679	66,258
7548	PUD No 1 of Grays Harbor County	WA	39,541	45,223	930,270	98,853
16612	City & County of San Francisco	CA	1,924	2,292	937,341	4,810
11646	City of Marietta - (GA)	GA	36,045	42,330	944,004	90,113
5661	City of Edmond - (OK)	OK	38,067	43,320	948,235	95,168
3940	City of College Station - (TX)	TX	41,879	45,496	948,395	104,698
10944	PUD No 1 of Lewis County	WA	29,752	34,809	964,301	74,380
9231	City of Independence - (MO)	МО	53,611	58,694	971,599	134,028
7294	City of Glendale - (CA)	CA	77,188	90,578	973,267	192,970
3758	City of Cleveland - (TN)	TN	28,727	33,722	984,597	71,818
28541	Clatskanie Peoples Util Dist	OR	3,761	4,314	987,145	9,403
2507	City of Burbank Water and Power	CA	46,688	53,729	992,871	116,720
15979	City of Richland - (WA)	WA	25,233	27,048	997,726	63,083
14534	City of Pasadena - (CA)	CA	58,128	66,719	1,038,201	145,320
19798	City of Vernon	CA	73	1,791	1,048,795	183
7625	City of Greeneville - (TN)	TN	32,244	40,349	1,066,041	80,610

13664	Norris Public Power District	NE	17,802	26,973	1,074,936	44,505
17642	Southern Public Power District	NE	15,238	27,933	1,082,766	38,095
12208	City of McPherson - (KS)	KS	7,401	8,954	1,087,050	18,503
11251	Loup River Public Power Dist	NE	16,102	20,547	1,092,638	40,255
6716	PUD No 1 of Franklin County	WA	27,081	29,428	1,103,231	67,703
6422	City of Florence - (AL)	AL	41,542	51,865	1,118,450	103,855
4958	Decatur Utilities	AL	22,787	26,904	1,126,746	56,968
8571	Town of High Point	NC	37,642	43,822	1,145,786	94,105
16181	Rochester Public Utilities	MN	53,932	59,088	1,147,712	134,830
8723	City of Holland	MI	26,100	30,855	1,159,321	65,250
16295	City of Roseville - (CA)	CA	61,048	68,351	1,159,434	152,620
4045	City of Columbia - (MO)	МО	44,483	52,016	1,166,380	111,208
20785	City of Wilson - (NC)	NC	31,530	36,199	1,168,581	78,825
6491	Foley Board of Utilities	AL	49,138	56,193	1,206,044	122,845
3264	Central Lincoln People's Ut Dt	OR	35,736	41,350	1,207,511	89,340
13208	City of Naperville - (IL)	IL	55,563	62,556	1,208,353	138,908
2409	Brownsville Public Utilities Board	TX	47,548	54,080	1,298,127	118,870
13788	Northern Wasco County PUD	OR	9,781	10,466	1,324,066	24,453
13955	City of Ocala	FL	45,245	57,113	1,337,330	113,113
5326	PUD No 1 of Douglas County	WA	16,513	17,364	1,345,707	41,283
9879	City Water and Light Plant	AR	34,591	40,224	1,366,894	86,478
40428	Guam Power Authority	GU	45,302	53,010	1,447,602	113,255
6604	City of Fort Collins - (CO)	СО	70,098	79,036	1,447,914	175,245
17828	City of Springfield - (IL)	L	59,023	70,331	1,465,629	147,558
944	City of Athens - (AL)	AL	48,040	55,923	1,508,594	120,100
3762	City of Cleveland - (OH)	ОН	64,034	72,917	1,513,494	160,085
16949	Sevier County Electric System	TN	35,133	61,951	1,550,786	87,833
3704	City of Clarksville - (TN)	TN	74,287	83,495	1,585,322	185,718
9612	City of Jackson - (TN)	TN	31,060	37,991	1,630,232	77,650
2442	City of Bryan - (TX)	TX	56,480	66,702	1,711,024	141,200
7639	Greenville Utilities Comm	NC	64,801	72,994	1,720,970	162,003
13418	City of New Braunfels - (TX)	TX	47,850	54,124	1,769,228	119,625
10376	Kissimmee Utility Authority	FL	75,776	87,457	1,777,444	189,440

	Lenoir - (TN) sville Regional					
	3	FL	92,308	103,864	1,812,090	230,770
PUD N	lo 1 of Benton		02,000	100,001	1,012,000	200,770
County	1	WA	49,607	57,263	1,838,441	124,018
9777 Johnso	on City - (TN)	TN	71,459	83,278	1,846,288	178,648
	lo 1 of Chelan					
County		WA	41,572	49,579	1,876,426	103,930
6/35	eville Public					
VVORKS	Commission	NC	75,939	85,387	1,915,389	189,848
	Lansing - (MI)	MI	87,001	99,449	1,990,972	217,503
	Riverside - (CA)	CA	100,056	112,764	2,046,191	250,140
	Lafayette - (LA)	LA	59,209	71,521	2,047,184	148,023
	Garland - (TX)	TX	68,034	74,889	2,058,212	170,085
	Anaheim - (CA)	CA	105,422	123,212	2,111,118	263,555
uuun i	Kansas City -	I/C	60 407	67.740	0.450.470	454.000
(KS)	Irrigation	KS	60,437	67,713	2,159,472	151,093
19281 District	•	CA	79,748	95,053	2,162,324	199,370
	Eugene - (OR)	OR	88,435	98,716	2,313,408	221,088
	Lubbock - (TX)	TX	95,273	110,848	2,532,272	238,183
Modes	to Irrigation	17	55,275	110,040	2,002,212	200,100
12745 District	•	CA	102,862	132,803	2,583,074	257,155
	Denton - (TX)	TX	56,448	62,556	2,591,221	141,120
City of	Tallahassee -	171	00,110	02,000	2,001,221	,
18445 (FL)		FL	101,063	113,300	2,674,525	252,658
City LIt	ilities of		,	,	, ,	,
1/833	field - (MO)	MO	104,020	120,554	3,085,980	260,050
4744 Dalton	Utilities	GA	12,972	17,421	3,138,604	32,430
10623 City of	Lakeland - (FL)	FL	118,281	134,647	3,232,733	295,703
11018 Lincoln	Electric System	NE	132,338	150,322	3,295,473	330,845
9216 Imperia	al Irrigation					
District		CA	140,906	163,579	3,403,891	352,265
1333/	ska Public Power	Multi-				
DISTRICT		State	74,046.0	93,830.0	3,825,812.0	185,115
4447	lo 1 of Cowlitz					440 450
County		WA	47,781	53,155	4,104,045	119,453
Thhan '	Santa Clara -	0.4	40.000	57.044	4 404 400	400 450
(CA)	0-1	CA	49,383	57,011	4,481,136	123,458
3080 1	Colorado	CO	214 707	252 402	4 496 070	E20 460
Spring	s - (CO)	CO	211,787	253,193	4,486,079	529,468
	Tacoma - (WA) lo 1 of Clark	WA	174,342	196,833	4,552,573	435,855
36611	/ - (WA)	WA	215,343	235,481	4,785,718	538,358
	Huntsville - (AL)	AL	175,492	196,014	5,063,802	438,730
	Chattanooga -	Multi-	110,434	130,014	3,003,002	700,130
Cit\/ Ot		IVIUILI-		I	1	
3408 City of (TN)	or all and organ	State	170,650.0	196,376.0	5,499,112.0	426,625

14624	PUD No 2 of Grant					
14024	County	WA	41,776	55,012	5,958,946	104,440
17470	PUD No 1 of					
17470	Snohomish County	WA	342,016	377,261	6,794,876	855,040
14610	Orlando Utilities Comm	FL	242,200	275,338	7,182,989	605,500
16868	City of Seattle - (WA)	WA	451,055	503,221	9,228,431	1,127,638
17543	South Carolina Public					
17343	Service Authority	SC	177,342	209,311	9,923,901	443,355
16534	Sacramento Municipal					
10004	Util Dist	CA	583,291	656,481	10,104,362	1,458,228
13216	Nashville Electric					
13210	Service	TN	405,896	451,476	11,552,367	1,014,740
9617	JEA	FL	455,609	515,515	12,294,646	1,139,023
14127	Omaha Public Power					
14121	District	NE	357,527	407,443	12,371,954	893,818
12293	City of Memphis - (TN)	TN	372,070	414,530	12,631,568	930,175
1015	Austin Energy	TX	490,069	544,400	14,396,991	1,225,173
15497	Puerto Rico Electric					
15497	Pwr Authority	PR	1,379,341	1,507,713	16,653,903	3,448,353
11171	Long Island Power					
11171	Authority	NY	1,028,015	1,155,211	18,007,106	2,570,038
	Los Angeles					
11208	Department of Water &					
	Power	CA	1,400,054	1,500,208	20,935,284	3,500,135
16604	City of San Antonio -					
10004	(TX)	TX	843,521	938,628	24,865,980	2,108,803
16572	Salt River Project	AZ	1,030,788	1,141,630	31,839,865	2,576,970

Residential customers, total customers, and total sales data were obtained from 2023 Form 861.

The estimated population was calculated based on the Census average of 2.5 persons per household and the residential customer count.

Table 2: Public Power Utilities Subject to Form 861M

Utilities with under 200,000 MWh in sales are highlighted in yellow.
Utilities with serving an estimated population of under 50,000 are highlighted in blue.

Utility Number	Utility Name	State	Residential Customers	Total Customers	Total Sales (MWh)	Estimated Population
10596	City of Lake Crystal - (MN)	MN	1,064	1,241	16,627	2,660
25866	Ak-Chin Electric Utility Authority	AZ	319	466	39,656	798
14537	Pascoag Utility District	RI	4,361	4,964	53,748	10,903
18206	Strawberry Electric Serv Dist	UT	3,592	4,070	63,192	8,980
19896	City of Volga - (SD)	SD	1,058	1,250	63,791	2,645
11477	Town of Madison - (ME)	ME	2,384	2,633	77,455	5,960
11475	City of Madison - (SD)	SD	2,793	3,298	104,925	6,983
8883	Houlton Water Company	ME	3,907	5,496	116,074	9,768
49998	City of Berea Municipal Utility	KY	4,669	5,309	119,680	11,673
4390	City of Corona - (CA)	CA	1,286	2,773	133,745	3,215
2008	City of Boulder City - (NV)	NV	7,124	8,056	145,874	17,810
15040	City of Pierre - (SD)	SD	6,145	7,343	167,998	15,363
10210	Ketchikan Public Utilities	AK	6,559	7,949	178,130	16,398
20310	Town of Wellesley - (MA)	MA	9,372	10,596	238,467	23,430
2010	City of Bountiful	UT	15,652	17,300	280,482	39,130
17845	City of Springville - (UT)	UT	10,701	12,179	288,906	26,753
2548	City of Burlington Electric - (VT)	VT	17,620	21,586	318,319	44,050
19882	Virginia Tech Electric Service	VA	5,738	6,913	319,717	14,345
2285	City of Brookings - (SD)	SD	10,227	11,954	326,271	25,568
7222	City of Gillette - (WY)	WY	13,933	16,646	335,368	34,833
8774	City of Holyoke - (MA)	MA	14,092	17,012	374,081	35,230
20187	Watertown Municipal Utilities	SD	11,339	13,993	394,101	28,348

7716	Groton Dept of Utilities - (CT)	СТ	12,240	13,850	400,661	30,600
9645	Jamestown Board of Public Util	NY	16,088	18,875	402,379	40,220
13519	City of Newark - (DE)	DE	11,845	13,377	411,986	29,613
8245	City of Hastings - (NE)	NE	11,409	13,858	417,397	28,523
11135	City of Logan - (UT)	UT	19,239	21,541	424,797	48,098
4373	Cornhusker Public Power Dist	NE	7,362	10,356	427,971	18,405
11204	Los Alamos County	NM	8,367	9,275	480,239	20,918
40437	Emerald People's Utility Dist	OR	19,583	22,503	501,002	48,958
6779	City of Fremont - (NE)	NE	13,845	16,355	508,841	34,613
20038	Town of Wallingford - (CT)	СТ	21,370	25,048	540,590	53,425
19273	City of Tupelo - (MS)	MS	10,549	15,683	565,408	26,373
4911	Dawson Power District	NE	16,023	23,408	600,681	40,058
15748	Town of Reading - (MA)	MA	27,217	30,483	635,289	68,043
17874	City of St George	UT	28,025	33,138	670,251	70,063
5335	City of Dover - (DE)	DE	21,406	24,900	702,260	53,515
40606	City of Grand Island - (NE)	NE	22,093	26,744	726,695	55,233
15444	Provo City Corp	UT	36,258	40,894	768,557	90,645
9187	City of Idaho Falls - (ID)	ID	27,097	31,688	782,638	67,743
3812	City of Clinton - (TN)	TN	25,968	30,946	782,985	64,920
3892	City of Coffeyville - (KS)	KS	4,736	5,755	806,282	11,840
2247	City of Bristol - (TN)	TN	29,384	34,211	842,447	73,460
13718	City of North Little Rock - (AR)	AR	34,724	39,873	888,186	86,810
13314	Navajo Tribal Utility Authority	AZ	39,087	43,762	896,184	97,718
6204	City of Farmington - (NM)	NM	35,824	44,935	909,139	89,560
16612	City & County of San Francisco	CA	1,924	2,292	937,341	4,810
9231	City of Independence - (MO)	МО	53,611	58,694	971,599	134,028
3758	City of Cleveland - (TN)	TN	28,727	33,722	984,597	71,818
28541	Clatskanie Peoples Util Dist	OR	3,761	4,314	987,145	9,403
14534	City of Pasadena - (CA)	CA	58,128	66,719	1,038,201	145,320

7625	City of Greeneville - (TN)	TN	32,244	40,349	1,066,041	80,610
13664	Norris Public Power District	NE	17,802	26,973	1,074,936	44,505
17642	Southern Public Power District	NE	15,238	27,933	1,082,766	38,095
11251	Loup River Public Power Dist	NE	16,102	20,547	1,092,638	40,255
6422	City of Florence - (AL)	AL	41,542	51,865	1,118,450	103,855
4958	Decatur Utilities	AL	22,787	26,904	1,126,746	56,968
16181	Rochester Public Utilities	MN	53,932	59,088	1,147,712	134,830
6604	City of Fort Collins - (CO)	СО	70,098	79,036	1,447,914	175,245
3704	City of Clarksville - (TN)	TN	74,287	83,495	1,585,322	185,718
10906	City of Lenoir - (TN)	TN	60,693	74,767	1,784,466	151,733
9777	Johnson City - (TN)	TN	71,459	83,278	1,846,288	178,648
6235	Fayetteville Public Works Commission	NC	75,939	85,387	1,915,389	189,848
10704	City of Lansing - (MI)	MI	87,001	99,449	1,990,972	217,503
9996	City of Kansas City - (KS)	KS	60,437	67,713	2,159,472	151,093
19281	Turlock Irrigation District	CA	79,748	95,053	2,162,324	199,370
6022	City of Eugene - (OR)	OR	88,435	98,716	2,313,408	221,088
12745	Modesto Irrigation District	CA	102,862	132,803	2,583,074	257,155
17833	City Utilities of Springfield - (MO)	МО	104,020	120,554	3,085,980	260,050
11018	Lincoln Electric System	NE	132,338	150,322	3,295,473	330,845
9216	Imperial Irrigation District	CA	140,906	163,579	3,403,891	352,265
13337	Nebraska Public Power District	SD	74,046	93,830	3,825,812	185,115
4442	PUD No 1 of Cowlitz County	WA	47,781	53,155	4,104,045	119,453
16655	City of Santa Clara - (CA)	CA	49,383	57,011	4,481,136	123,458
3989	City of Colorado Springs - (CO)	СО	211,787	253,193	4,486,079	529,468
18429	City of Tacoma - (WA)	WA	174,342	196,833	4,552,573	435,855
3660	PUD No 1 of Clark County - (WA)	WA	215,343	235,481	4,785,718	538,358
9094	City of Huntsville - (AL)	AL	175,492	196,014	5,063,802	438,730

3408	City of Chattanooga - (TN)	GA	170,650	196,376	5,499,112	426,625
10421	Knoxville Utilities Board	TN	190,846	216,175	5,684,642	477,115
17470	PUD No 1 of Snohomish County	WA	342,016	377,261	6,794,876	855,040
16868	City of Seattle - (WA)	WA	451,055	503,221	9,228,431	1,127,638
17543	South Carolina Public Service Authority	SC	177,342	209,311	9,923,901	443,355
16534	Sacramento Municipal Util Dist	CA	583,291	656,481	10,104,362	1,458,228
13216	Nashville Electric Service	TN	405,896	451,476	11,552,367	1,014,740
9617	JEA	FL	455,609	515,515	12,294,646	1,139,023
14127	Omaha Public Power District	NE	357,527	407,443	12,371,954	893,818
12293	City of Memphis - (TN)	TN	372,070	414,530	12,631,568	930,175
11171	Long Island Power Authority	NY	1,028,015	1,155,211	18,007,106	2,570,038
11208	Los Angeles Department of Water & Power	CA	1,400,054	1,500,208	20,935,284	3,500,135
16604	City of San Antonio - (TX)	TX	843,521	938,628	24,865,980	2,108,803
16572	Salt River Project	ΑZ	1,030,788	1,141,630	31,839,865	2,576,970

The list of public power utilities was obtained using 861M data for January 2023.

Residential customers, total customers, and total sales data were obtained from 2023 Form 861.

The estimated population was calculated based on the Census average of 2.5 persons per household and the residential customer count.