

S030  
dx. 2-3A-1

## 1. DESCRIPTION OF THE AMERICAN PUBLIC POWER ASSOCIATION

The American Public Power Association (APPA) is the national service organization representing the interests of not-for-profit, publicly owned electric utilities throughout the United States. APPA member utilities serve some of the nation's largest cities, such as Los Angeles, Sacramento, Seattle, Phoenix (Salt River Project), Jacksonville, San Antonio, Nashville, Memphis, Cleveland, Omaha, Orlando, and cities and towns on Long Island (Long Island Power Authority). Several state public power agencies, such as New York Power Authority, South Carolina Public Service Authority, and Lower Colorado River Authority in Texas, provide electric power to many communities within their states. In addition, APPA members include joint action power supply agencies and public power distributors. The majority of APPA member utilities are located in small- and medium-sized communities in every state except Hawaii.

More than 2,000 public power systems provide over 15 percent of all kilowatt-hour (kWh) sales to ultimate customers in the United States. Approximately 1,870 of these systems are cities and municipal governments that currently own and control the day-to-day operation of their electric utility systems. They purchase nearly 70 percent of the power used to serve their ultimate customers. Public power systems own about 8 percent of the nation's high voltage transmission lines.

## 2. APPA'S INTERESTS IN THIS PROCEEDING

APPA requests representation on the negotiated rulemaking committee to process an update to OSHA's standard on cranes and derricks. (Published in the Federal

Register July 16, 2002. 67 FR 46612) Throughout the 2000+ communities that APPA represents, crane and derrick operation is a daily operation, one that extends beyond the typical electric utility. Many within the APPA membership operate additional utilities and services such as Water, Waste Water (Sewer), Gas distribution, Telecommunications, and other community specific services ranging from streets and transportation to parks and recreation. As imagined, the idea of mandated certification could have a major impact on these smaller communities since they are currently limited by resources, both staff and finances. Burdens such as increased spending for certification, testing requirements, travel, and education needs are just some of the applicable concerns APPA has for its membership. At the same time, many in APPA's membership have developed the expertise and knowledge of cranes and derricks by operating and maintaining their citywide services for over a century. As the unified voice of the more than 2000 municipalities owning and operating their own electric systems, APPA requests the opportunity to participate in this negotiated process by securing a seat at the table to be used by APPA staff, or when applicable, a representative of the APPA membership.

### **3. APPA CONTACT INFORMATION**

Mr. Michael J. Hyland, PE  
Director of Engineering Services  
American Public Power Association  
2301 M Street NW  
Washington, DC 20037  
(202) 467-2986  
(202) 467-2992 Fax  
mhyland@appanet.org