

Filed Electronically Via Regulations.gov

June 27, 2022

Khem R. Sharma, Ph.D., Chief
Office of Size Standards
409 Third Street, SW
Mail Code 6530
Washington, DC 20416

RE: RIN 3245-AH09, Proposed Rule, Small Business Size Standards: Manufacturing and Industries with Employee-Based Size Standards in Other Sectors Except Wholesale Trade and Retail Trade

Dear Dr. Sharma:

The National Rural Electric Cooperative Association (NRECA) appreciates the opportunity to provide comments on the above-captioned Proposed Rule. 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 growing regions 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. Electric cooperatives operate at cost and without a profit incentive. NRECA's member cooperatives include 63 generation and transmission (G&T) cooperatives and 831 distribution cooperatives. The G&Ts generate and transmit power to distribution cooperatives that provide it to the end of line co-op consumer-members. Collectively cooperative G&Ts generate and transmit power to nearly 80 percent of the distribution cooperatives in the nation. The remaining distribution

cooperatives receive power directly from other generation sources within the electric utility sector. Both distribution and G&T cooperatives share an obligation to serve their members by providing safe, reliable, and affordable electric service.

NRECA supports the changes that the Small Business Administration proposes to entities in NAICS codes generally found in Section 22. NRECA members are involved in the following NAICS Industry titles:

<i>NAICS Code</i>	<i>NAICS Industry Title</i>
22111	Hydroelectric Power Generation
22112	Fossil Fuel Electric Power Generation
22113	Nuclear Electric Power Generation
22114	Solar Electric Power Generation
22115	Wind Electric Power Generation
22116	Geothermal Electric Power Generation
22117	Biomass Electric Power Generation
22118	Other Electric Power Generation
22121	Electric Bulk Power Transmission and Control
22122	Electric Power Distribution

We applaud SBA’s careful analysis of industry trends as well as the Agency’s sensitivity to the ongoing deleterious impacts of the COVID-19 pandemic and associated economic challenges. We agree with the SBA’s decision to either maintain the current size standards for our industry (NAICS Code 22116), set the standard higher than the current standard but lower than the calculation pursuant to analysis (NAICS Code 22114), or increase the size standard pursuant to the Agency’s calculations (NAICS Codes 22111,22112, 22113, 22115, 22116, 22117, 22118, and 22121).

Thank you for the opportunity to review and comment. Please contact me if you have any questions or concerns.

Respectfully submitted,

A handwritten signature in black ink, reading "Martha A. Duggan". The signature is written in a cursive style with a long horizontal flourish at the end.

Martha A. Duggan, CLCP
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