

EUCG **2015** ANNUAL **MEMBERSHIP** REPORT





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EUCG A global association of utility professionals and member companies which is recognized as the electric energy industry source for performance information.



EUCG 2015 ANNUAL MEMBERSHIP REPORT

It is with great pride that we write to you as the EUCG Board of Directors in this Annual Membership Report.

2015 marked EUCG's 42nd year since its inception in 1973. Since that time, the consortium of utility companies from around the world continues to contribute valuable insights and continues to gain tremendous value in the offerings of EUCG. These utilities are finding that EUCG aids them in not only managing costs, but in slowing the eroding margins many in the industry are facing. EUCG is actively aiding companies in building the future versus living in the past. In 2015 alone, this foundation was further strengthened and great strides were made in helping secure the world's power generation and delivery success in the decades to come.

We want to sincerely thank you, the membership of EUCG, for this success. EUCG, as a nonprofit, exists to serve you. Through your active participation, your voice creates the products, programs, and services offered through EUCG. We are amazed at the quantity and quality of work products that come from the successes of each and every EUCG committee represented. It is always fulfilling to see these products on display at our Spring and Fall Workshops. The presentations, expert panel discussions, and keynote speakers continue to add tremendous value to our members. Additionally, the networking that occurs among our members is as valuable as the information shared in the formal sessions. The power of networking with your peers who face similar issues from around the world is priceless. EUCG will continue to deliver these opportunities.

In 2015, our membership consisted of 106 member companies with a member retention rate of over 94%, including members lost due to industry consolidations. The high retention rate demonstrates the value members see in EUCG

once they are introduced to the value proposition we offer. In fact, EUCG had the largest attendance on record at not one, but both workshops since the financial crisis of 2008. In addition to providing quality workshops and programs for member companies, EUCG has recently delivered yet another valuable tool for member companies and their representatives. EUCG recently reached the final stages of adding a Resource Library to the EUCG website. This exciting new feature will serve as an easily accessible and searchable archive for members to view workshop, committee and EUCG documents.

Through careful budgeting and expense controls, EUCG continues to be financially sound and well-positioned to continue to deliver added value to our members. Our financial stability will allow us to continue to make prudent investments in member products, programs and services, and to provide the industry's best data and benchmarking studies which will aid our members in making strategic decisions within their own organizations.

Our commitment to you is to continue to improve upon the EUCG value proposition and to ensure every penny spent goes toward helping you run your businesses better than ever before. While many of our member companies belong to multiple committees at EUCG, not all do. We encourage you to take a look at the work products in all of our committees which are highlighted in this report. We are certain you will find value in them. We know your company stands to benefit from a broad membership in EUCG.

Thank you again for all that you do to help make our organization great!

Sincerely,

Your EUCG Board of Directors

George Sharp	Kathy Shoopman
Evelyn Grant	Stephanie Maggard
Stephen Thornton	Jesse Medlock
Chris Utracki	David Ward, Jr.
Ed Taylor	Waco Bankston
Jacque Fuller	

NUCLEAR POWER

NUCLEAR ENERGY is by far the largest clean-air energy source and also a reliable energy source which produces around 11% of the world's electricity. The average nuclear energy facility is on line 90 percent of the time, generating on-demand electricity around the clock. Nuclear energy is a secure electricity source that is not subject to changing weather or climate conditions, unpredictable fuel cost fluctuations or over-dependence on foreign suppliers.

Continued production of safe, reliable and cost effective nuclear energy is the cornerstone of the nuclear industry. The EUCG Nuclear Committee's Mission supports these efforts by providing members with timely, relevant and comprehensive cost data and the facility to network to resolve industry business and operations financial issues to enable sustainable performance improvements in nuclear power.

Message from the Chair:

The EUCG Nuclear Committee continues to deliver data and products to its members that provide information in a timely and accurate manner. In 2015 the EUCG Nuclear Committee accomplished the following initiatives as directed by the group's strategic plan.

1. Issue Resolution:

Implement process for issues identification, resolution and benchmarking initiatives according to the new EUCG Workshop format.

This was accomplished by identifying and prioritizing initiatives and focusing efforts on a couple of key initiatives each year. Further streamlining of task team initiatives keeps the focus and momentum moving forward after each workshop ends to compile an effective and timely deliverable.





2. Industry Network Engagement:

Build working relationships and strategic partnerships with related Industry associations.

This was accomplished by meeting with “Nuclear Supply Chain Strategic Leaders” (NSCSL) to form collaborative initiatives to use the strength & skills of our respective organizations in order to better understand and evaluate inventory to enhance the value of information for our member companies.

3. Data Access/Management:

Improve database products and services to ensure effective usage, credibility and enhanced benchmarking efforts for member companies.

This was accomplished by: 1) transitioning to the new EUCG Nuclear website with new professional look and enhanced tools; 2) enhancing data review and data provider training sessions to provide member value and integrity of the data; 3) developing required Data Provider training qualifications to ensure data consistency and creditability.

The EUCG Nuclear Committee is the most complete, accurate, and timely industry source for business operations cost data in the world. Data is provided directly by the operating company members and then reviewed and verified by industry peers before final release. The EUCG Nuclear Committee continues to provide the following nuclear industry cost information to our members:

- **Nuclear Operating Cost** which includes outage refuel details
- **Nuclear Capital Cost** which includes major projects
- **Nuclear Staffing** which includes regular employees and contractors
- **Nuclear Industry Benchmark** data which includes the annual Chief Nuclear Officer and Standard Benchmarking reports

The initial release of previous year’s reported data is available to the members in February and the comprehensive/detailed data is available in May. Members also have the ability to request ad-hoc data requests for special situations that may arise during the year.

The EUCG Nuclear Committee continues to provide networking opportunities for members to interface with their peers and discuss emerging nuclear business operations issues or items. These issues are presented before an audience that consists of representatives from all the nuclear operating companies in the United States and also from nuclear operating companies in France, Japan, Romania, Spain, China, and Brazil.

Nuclear Committee Members

Ameren Missouri | USA
American Electric Power | USA
Arizona Public Service Company | USA
Asociacion Nuclear Asco-Vandellos | Spain
Bonneville Power Administration | USA
Bruce Power | Canada
Centrales Nucleares Almaraz-Trillo AIE | Spain
CNNC Nuclear Power Operations Management Co. | China
Comision Federal de Electricidad | Spain
CRIEPI | Japan
Daya Bay Nuclear Power Operations and Management Co. | China
Dominion Generation | USA
DTE Energy | USA
Duke Energy | USA
Electricite de France | France
Eletronuclear | Brazil
El Paso Electric | USA
Energy Northwest | USA
Entergy Nuclear | USA
Exelon | USA
FirstEnergy Nuclear Operating Corp. | USA
Institute of Nuclear Power Operations | USA
Luminant | USA
Nebraska Public Power District | USA
NextEra Energy | USA
Nuclear Energy Institute | USA
Omaha Public Power District | USA
Ontario Power Generation | Canada
PG&E | USA
PPL Susquehanna | USA
PSEG | USA
SCANA (South Carolina Electric & Gas) | USA
Southern Company | USA
STP Nuclear Operating Co. | USA
Tennessee Valley Authority | USA
Wolf Creek Nuclear Operating | USA
Xcel Energy | USA

HYDROPOWER harnesses the gravitational force of falling water. It is the simplest and the most benign mode of electric power generation. Its full life cycle greenhouse gas emissions (GHG) are as low as wind or nuclear power while the cost efficiency and power quality are unsurpassed by any other mode of generation. Water stored in a reservoir behind a dam acts like a battery, and can be used to generate at optimum times (or when needed most).

LOOKING BACK ON 2015

In 2015, the three strategic focus areas remained very much unchanged:

- 1. To improve HPC Cost and Performance database**
- 2. To provide effective products and forums that focus on optimizing members' operating performance, and**
- 3. To grow EUCG HPC coverage of hydropower sector in terms of both, installed capacity and number of member utilities.**

Energy can be released quickly when required and, at times of excess energy on the market, the process can be reversed by pumping units placing water back behind the dam. Among all generating technologies, Hydro units are the quickest to move up and down the load curve. As a result, hydropower is the key contributor ensuring the reliability of the electric systems. In general, hydropower is characterized by high value and low production costs. Hydropower creates economic growth and contributes to the wealth of the nations.

Hydroelectric Productivity Committee's (HPC's) goal is to assist member companies in achieving operational excellence by providing relevant, accurate, and timely benchmark information on cost, performance, and best practices. The Committee currently comprises of representatives from 20 international organizations from which 18 are utilities (see list on page 7). The Committee strongly benefits from the diversity of associated professionals spanning engineering, operations, accounting and management disciplines. Total capacity of plants operated by EUCG HPC associated utilities is now well over 100,000 MW from which about 70,000 MW (455 plants) are reported in the HPC database.

BENEFITS OF MEMBERSHIP:

Benchmarking is the main activity of the Committee.

It is accomplished through:

- Annual cost and performance reports
- Web based access to database for standard and custom reports
- Staffing and safety survey reports
- Ad hoc surveys run in response to member needs
- Discussions, presentations and networking opportunities at the spring and fall workshops.

Cost and Performance data is collected in the HPC Database accessible to members on the web. Significant effort is given to maintaining high data quality. Peer data audits are conducted each year which results not only in better data quality but also builds better understanding of the reporting methodologies different utilities use.

Data quality is achieved through:

- Automatic data validity checks
- Peer data audit meetings
- Educated users (data audit meetings are the best learning experience)
- Continuous improvement of reporting standards
- Web access with quick turnaround time
- Centrally controlled web site and data security
- User-friendly interface that evolves with users' needs
- Very, very low cost of service

Two semi-annual workshops, held in spring and fall, provide the opportunities to discuss issues and practices with peers. One of the key competitive advantages of HPC membership is the committee's flexibility to address different topics and the speed with which one can obtain information directly from the source. Another,

FIGURE 1 — Plant Cost Performance

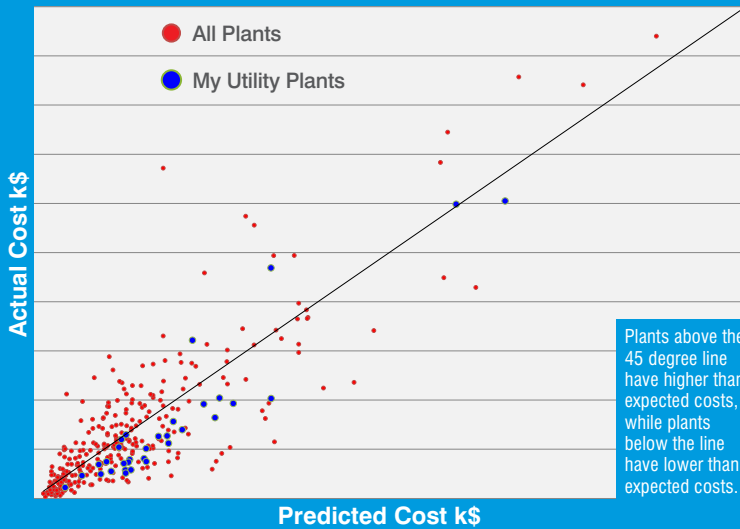
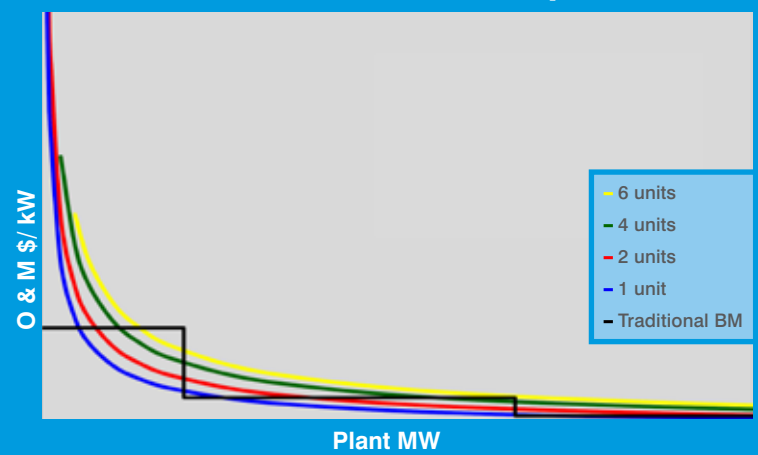


FIGURE 2 — Reference Cost per kW



perhaps not immediately apparent advantage, is the fact that by being involved in production and audit of the information, committee members get a much better feel for what the performance numbers really mean and what the trends and sensitivities to other parameters (*e.g. scale of operations*) are. The Committee endorses give-to-get principles by which one has to contribute in order to receive corresponding information from other members.

The Committee made significant accomplishments in all three of its focus areas.

To mention a few:

- **Database content increased from 378 to 455 plants** reported for 2014. The additions were made mostly in the small plants category. With Enel Green Power joining the Committee in 2015, further increase in the reported plants number is expected next year.
- **Peer Data review was carried out in July 2015.** It was a successful meeting that set a new standard for data quality and also resulted in improvements to data definitions.
- **Earlier in 2015, the first HPC Annual Report containing most recent statistics and findings was published.**
- **Continuous benchmarking methodology was established in close collaboration with ORNL’s Energy-Water Resources Systems Group.** Individual hydropower plants can be evaluated against their cost predicted by an economy of scale-adjusted continuous benchmark. Actual costs can then be compared to predicted costs (*Figure 1*). The methodology allows quantifying impacts from the scale of operations without step changes in benchmarks introduced by peer group boundaries (*Figure 2*). In addition, it quantifies the tradeoffs between plant MW size and the number of units. Simply put, the methodology eliminates two factors that are not under plant management control, leaving cost performance measures more directly linked to what management can in fact be held accountable for.
- **An HPC-sponsored paper titled “Assessing the Impact of Economies of Scale on Hydropower Plant O&M” was presented at the 2015 HydroVision International Conference.**
- **Spring and Fall workshops delivered several interesting papers.** Worth mentioning are papers that sum up industry experience such as “A review of multi skilled trades implementation” or “A review of Outage Evaluation Techniques and Strategies”.

The Year Ahead

The Committee has an ambitious agenda for 2016. It will continue on the path of data quality improvement and at the same time enhance value-added analyses. The plan is to further explore the synergy of collaboration with Oak Ridge National Laboratory. One area targeted for such development is ability to evaluate impact from locational labor or material price indices (which similarly to economies of scale are not under management control). Another topic the Committee will pursue in 2016 is the ever growing issue of integration of intermittent renewables and their impact on hydro plant operations and costs. This is all in addition to the routine tasks such as documenting industry performance in the HPC Annual Report.

Hydro Committee Members

- Bonneville Power Administration** | USA
- Electricity Supply Board** | Ireland
- Enel Green Power** | Italy
- Eugene Water & Electric Board** | USA
- Exelon Power** | USA
- Hydro Québec** | Canada
- New Brunswick Power** | Canada
- Eagle Creek Renewable Energy** | USA
- Oak Ridge National Laboratory** | USA
- Ontario Power Generation** | Canada
- Pacific Gas & Electric Company** | USA
- Seattle City Light Company** | USA
- Southern California Edison** | USA
- Southern Company** | USA
- Statkraft Energi AS** | Norway
- Tacoma Power** | USA
- Tennessee Valley Authority** | USA
- U.S. Army Corps of Engineers** | USA
- United States Bureau of Reclamation** | USA
- Volta River Authority** | Ghana

FOSSIL POWER

FOSSIL POWER generation challenges continued to increase in 2015. The Clean Power Plan, the Coal Combustion Residuals Rule, the update of the Steam Electric Effluent Limitation Guidelines and the implementation of the 316(b) rule and MATS have created new uncertainty in the fossil generation market. These regulations, the increasing influence of renewables and low natural gas prices are leading electric utilities to evaluate the long term value of coal and nuclear generation in the electric generation marketplace.

The opportunity to discuss these issues with other professionals in fossil generation and to share best practices is an important tool to have available when confronting these and other challenges facing the fossil industry. The EUCG Fossil Productivity committee provides regular chances to meet with other industry professionals to learn best practices and to participate in benchmarking which provide members with opportunities to learn ways to improve from other professionals who are experiencing the same challenges.

The EUCG Fossil Productivity Committee provides several different types of opportunities to learn best practices and in all areas of fossil plant operations and maintenance.

Each year, the committee performs annual surveys for standard operating metrics as well as specialized surveys which are of interest to our members. The annual surveys are used to identify best performers who are then invited to share their methods with committee members at the semi-annual EUCG conferences.

Best Performers for 2015 *(5-Year Overall)*

Plant Gadsden
Southern Company

Labadie Energy
Ameren Missouri

Fayette Power Project
Lower Colorado River Authority

Annual Winner

Fayette Power Project | Lower Colorado River Authority



In addition to benchmarking opportunities, the EUCG Fossil Productivity Committee provides several different types of opportunities to learn best practices. The Spring and Fall EUCG Conferences in 2015 saw member-led panels discuss many topics of member interest such as plant safety case studies, strategies for improving the safety culture, maintenance procedures and job plans, heat rate improvement, tracking and improving productivity, new environmental rule compliance strategies and cycling costs associated with combined cycle plants. The annual Outage Forum brings together outage managers and planners from member utilities to discuss outage best practices. The 2015 Outage Forum saw panels and presentations on topics dealing with issues such as outage staffing plans, outage readiness assessments, outage scope control and outage case studies. The presentations from the EUCG conferences and the Outage Forum are available on the EUCG website in the member area.

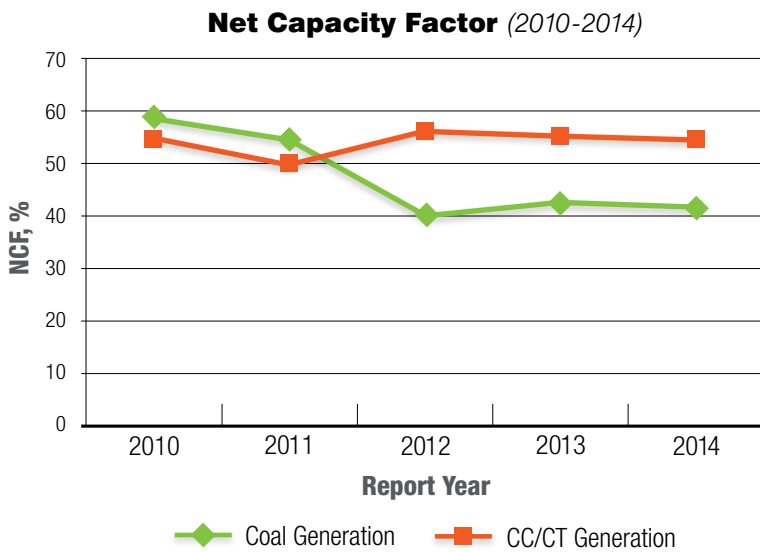
Finally, the EUCG Fossil Productivity Committee continues to look for ways to provide additional value to our members. Webcasts provide opportunities for committee members to share best practices without waiting for conferences. The committee plans to offer a webcast related to CC/CT equipment maintenance in early 2016. The committee will be launching an upgrade to our on-line metrics database. The upgrade will provide our members with CC/CT units to enter their data into the on-line database and to be able to use the database to develop needed CC/CT benchmarking data.

The Impact of Renewables and Natural Gas on Net Capacity Factor

The chart below indicates that the Net Capacity Factor (NCF) of coal generation has fallen by 14% since 2011 while the NCF of CC/CT generation rose by 6%. This comparison highlights the impact that lower natural gas prices on the generation market place. It should also be noted that the increase in CC/CT generation NCF was significantly less than the loss in coal generation NCF. This is an indication of the impact that renewables has had on the generation marketplace.

Fossil Committee Members

- Ameren Missouri** | USA
- Austin Energy** | USA
- Consumers Energy** | USA
- CPS Energy** | USA
- DTE Energy** | USA
- Exelon Generation** | USA
- Israel Electric Corporation** | Israel
- Korea East-West Power** | Korea
- Lower Colorado River Authority** | USA
- NB Power** | Canada
- Ohio Valley Electric Corp.** | USA
- Omaha Public Power District** | USA
- Owensboro Municipal Utilities** | USA
- PG&E** | USA
- PSEG** | USA
- Salt River Project** | USA
- Southern California Edison** | USA
- Southern Company** | USA
- Tampa Electric Power** | USA
- Tennessee Valley Authority** | USA
- Volta River Authority** | Ghana



TRANSMISSION & DISTRIBUTION

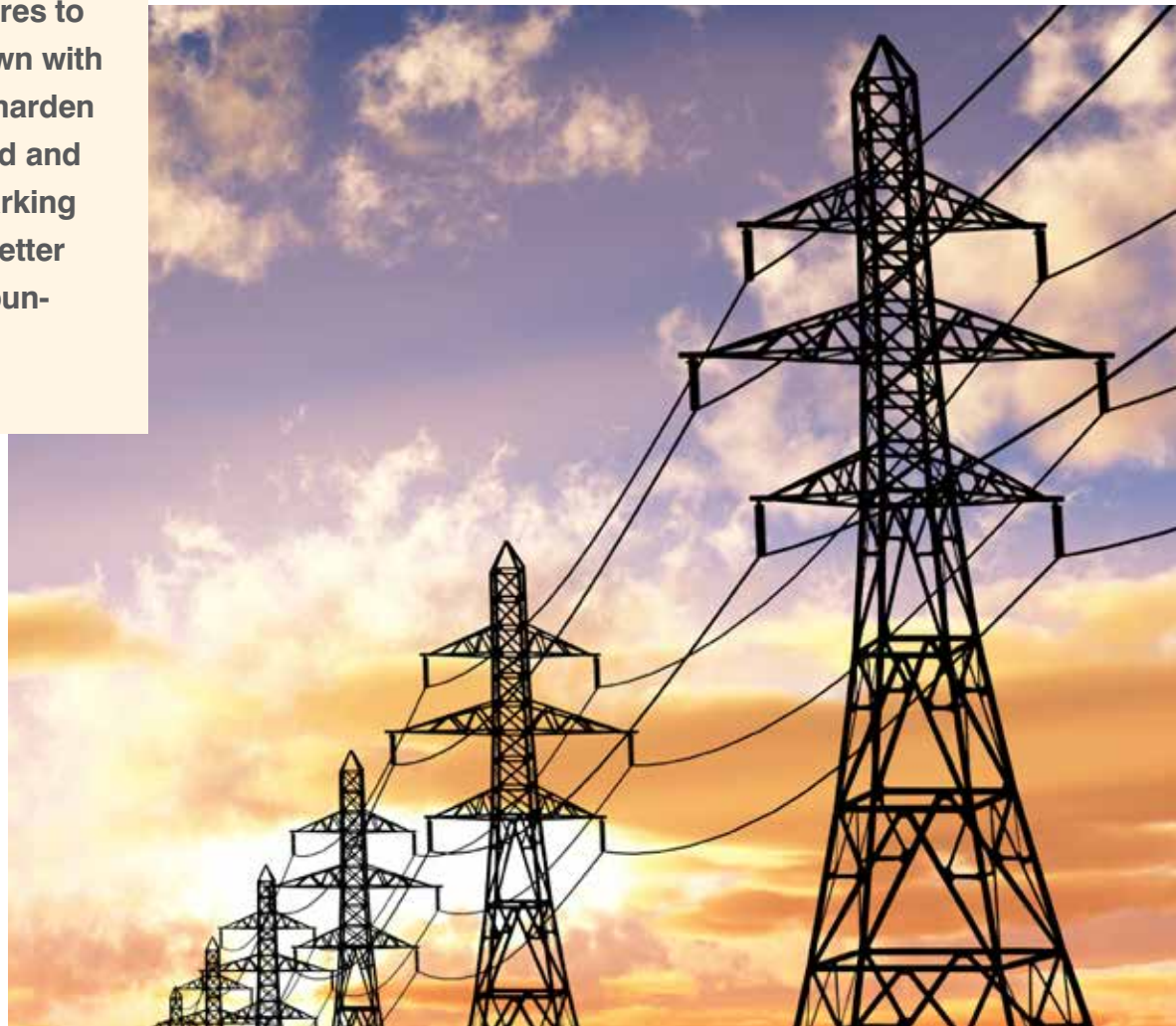
However and wherever the power is generated, it still must be delivered to your customers. For many, this will be over hundreds of miles across the Bulk Power System to local Distribution Systems. The technical challenges of keeping the grid up and providing high power quality at a low price are significant. As the mix of generation changes and supply becomes more distant relative to load in some instances, the challenges can only grow. Add to this the pressures to keep overall costs down with counter pressures to harden and modernize the grid and the need for Benchmarking and identification of Better Practices becomes abundantly clear.

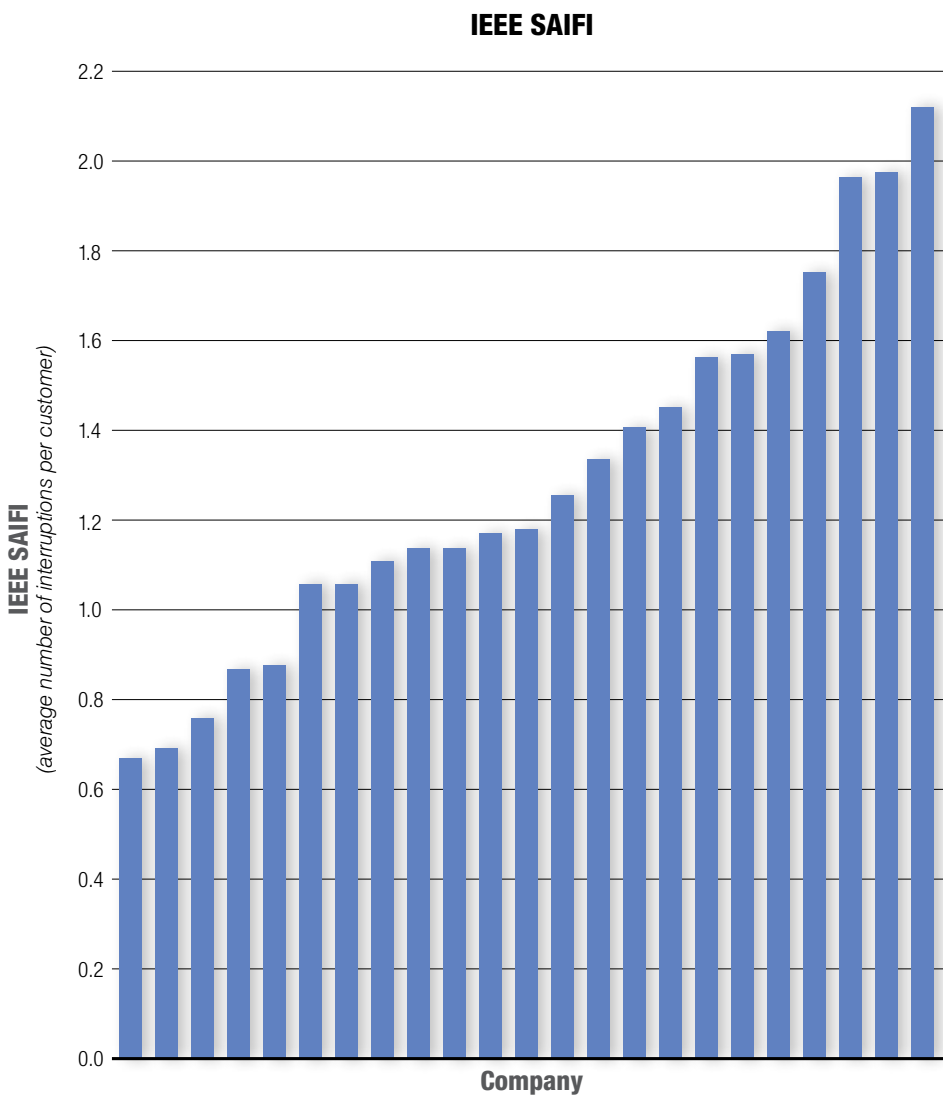
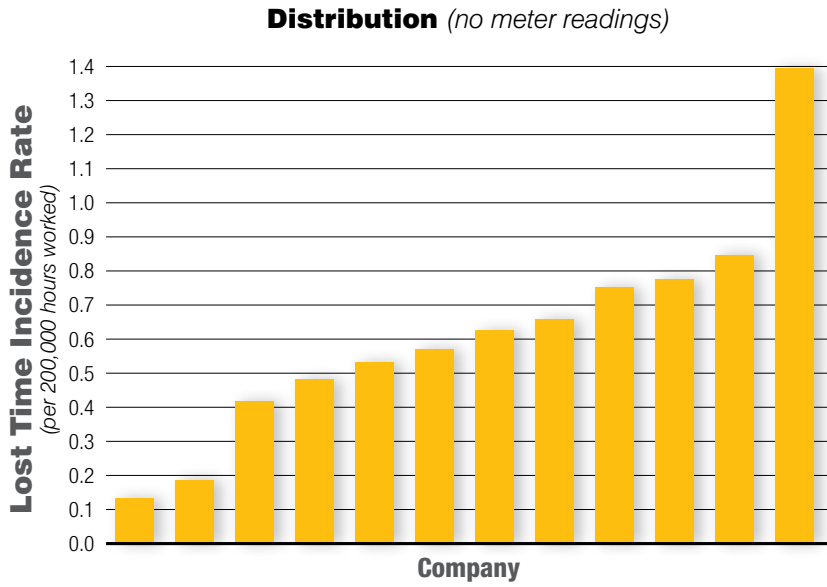
T&D Benchmarking is vital to both to our industry and the individual participating utilities. Our ability to partner and collaborate to identify better practices presents unique opportunities for us all as compared to participants in other industries. To the extent that we can acknowledge and leverage this advantage, our companies, our employees and the customers we serve will all realize benefits.

The efficiencies and discipline required to control costs, maximize reliability and maintain employee and public safety mandate that we collaborate and work together to identify and propagate that next “great idea” that will transform some aspect, however small, of our business practices such that the next incremental improvement is realized.

It is the leveraging of data, networking and sharing of ideas that make the EUCG T&D Committee so valuable to its members. As a member, you do not just have access to current members and practices; you will have access to more than a decade of practices presentations. Data is available on a give-to-get basis.

Our Safety and System Reliability data sets continue to evolve and improve as conditions warrant. We have recently re-opened our Transmission Cost Study. If we can grow this panel, it will be the best in class. All databases are and will continue to be professionally managed.





T&D Committee Members

- American Electric** | USA
- American Transmission Company** | USA
- Baltimore Gas & Electric** | USA
- CenterPoint Energy** | USA
- ComEd** | USA
- Duke Energy** | USA
- Georgia Transmission Corp.** | USA
- Ghana Grid Company** | Ghana
- Oncor Electric Delivery** | USA
- PG&E** | USA
- PSE&G** | USA
- Salt River Project** | USA
- Tennessee Valley Authority** | USA

Data Base Services
provided by
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INFORMATION TECHNOLOGY

With the growing demand for technological business solutions in a rapidly changing and ever more competitive electrical industry, the importance of Information Technology (IT), both as a business partner and a key enabler, cannot be overstated. Moreover, these solutions have to be delivered cost-effectively and efficiently to maintain a competitive advantage in the markets. This is why the collaboration of IT committee members from all walks of life facing similar challenges is so valuable. Compared to other leading benchmarking organizations, EUCG is the cost effective solution.

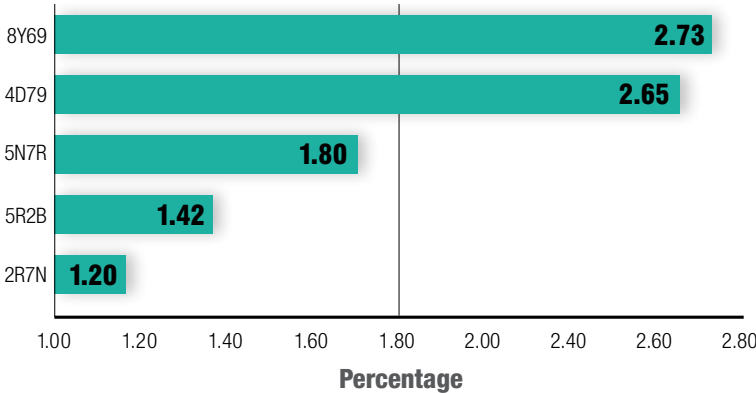
The EUCG IT Committee has been in existence for nine years with representatives from both U.S. and Canadian utilities in the areas of nuclear, fossil, hydroelectric power generation as well as transmission and distribution companies. Typically, members work either in the IT or the Finance function and have a well-rounded understanding of their respective businesses and the opportunities / challenges they face which tend to be common across all the participants. For example, the growing threat from cyber security and the need to better track the associated costs and investments in this area led to the IT Committee establishing a separate reporting tower to capture this data beginning in 2013 and the results are now incorporated as part of the annual survey report. Also, recognizing the growth in use of tablets and BYODs within the work environment, this metric has been added to the non-monetary dataset that the members collect and report out on annually. With cloud computing on the rise, Committee members using this technology shared their perspective at the last conference on the challenges and benefits encountered. In addition, trend data provides a useful year-over-year comparison of IT costs and spend. More importantly, the granularity of the data capture provides members with key insights into the various towers and their year-over-year change.

One of the more innovative changes that the IT committee has implemented since 2012 is inviting key CIOs from leading utilities located in the vicinity of the bi-annual conferences. They share their unique insight and perspective on the ever-changing IT landscape and 'what keeps them awake at night'. The IT committee is fortunate to have had CIOs from Energy Northwest,

South Texas Project, Ontario Power Generation, Wolf Creek and Entergy attend and provide very interesting and contemporary outlooks on technological thought leadership which they believe is paving the way for future changes in our industry. Mini-surveys also offer a quick and simple way to canvass the members to obtain a relevant pulse-check on key initiatives or programs (three to date in 2015 on Records & Doc Mgm't, Cellular & Pager Mgm't, and Non-Standard Electronic Records). For 2016, one of the focus areas is Operational Technology and how this growing platform is beginning to integrate with the traditional world of Information Technology. Through open and interactive sessions during the bi-annual conferences, the IT committee has built a cohesive support network of knowledgeable, engaged representatives and is well-positioned to continue to improve the accuracy and value of annual benchmarking data which our members have found extremely valuable back at their home locations.

The sample bar graphs below show two of the key metrics that the IT Committee tracks and reports out annually on and there are many more including Total IT Costs per Company Employee, per Customer, per End User and IT Staff as % of Total Employees. The full dataset and reports package is available to all members.

Tower Total IT Cost (% of Revenue)



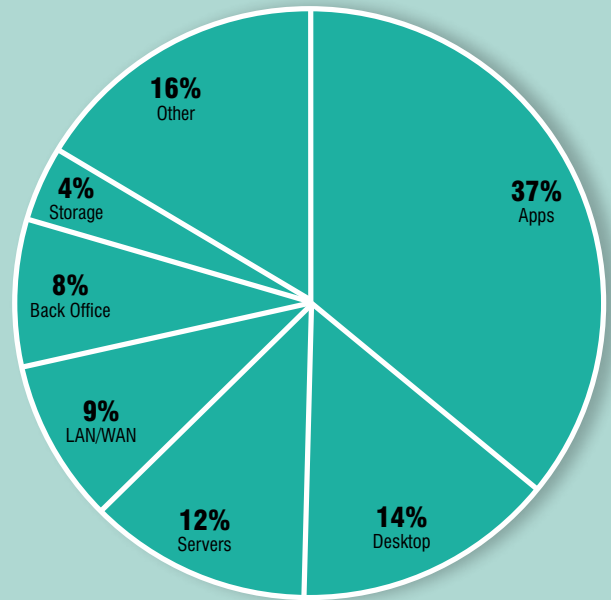
Tower Total IT Costs (Per Mwh)



2014 Total IT Cost Expenditure

(Percent by Tower)

The pie-chart below shows the combined 2014 IT spend of all the survey participants by tower with the Applications tower accounting for more than a third of the spend. 'Other' includes towers with smaller annual spends including Help Desk, Security, Voice and Mainframe.



IT Committee Members

- Bruce Power** | Canada
- Energy Northwest** | USA
- NB Power** | Canada
- Omaha Public Power District** | USA
- Oncor Electric Delivery** | USA
- Ontario Power Generation** | Canada
- PSEG** | USA
- STP Nuclear Operating Company** | USA

CONFERENCE & WORKSHOPS

In 2015, EUCG had two wonderful workshops for member companies. Our workshops have become “can’t miss” member events that deliver significant educational, training, and networking opportunities. While other associations have been severely impacted in recent years by the financial crisis and company-imposed travel restrictions, EUCG’s workshops have continued to grow in size and quality. In fact, the workshops in 2015 were the most highly attended in the past seven years. Why is this? Based on surveys, we learn every year of the significant benefits our member companies receive from our workshops which directly help them run their departments and organizations more efficiently. Additionally, while we have always scored high on conference evaluations from our attendees, 2015 saw the highest scores, in aggregate, that we have seen in many years.

We listen to our membership and have continued to select desirable locations for the workshops. Our Spring workshop was held in April in Nashville at the Hilton Nashville Downtown. The vibrant and exciting Music City was a well-loved location for the workshop attendees. The committee sessions and presentations were top-notch and the networking and best practice sharing were second to none. Many attendees had tangible actions which they planned to take back to their companies. We want to thank Tennessee Valley Authority for their role as the host utility.

In September, we traveled to San Diego for the Fall Workshop and Conference which was our first west coast workshop in many years. The historic US Grant Hotel was a great site for the workshop, as it was conveniently located in the heart of the city. We would like to extend our thanks to Southern California Edison for being the host utility. Attendees were able to tour the USS Midway, one of San Diego’s treasures, and learn about the details of some of our Nation’s history by some of the very people who played a part in that history.

Attendees again learned from each other and the benchmarking studies conducted by EUCG. While great fun was had by all, every person went back to their jobs and companies with increased knowledge and information to help drive added value and success in each of their companies.

EUCG FALL 2015 CONFERENCE & WORKSHOP

Shining a Light on Performance



THE POWER OF PERFORMANCE

EUCG Spring 2015
Conference & Workshop

April 12-15

Hilton Nashville Downtown
Nashville, Tennessee





2016

Future Events

In 2016, we will continue to raise the bar on our workshops to ensure they deliver content you desire and can act upon to improve your company's strategies and results. We will also continue to enhance our execution of all of the operational aspects of the meetings. In April 2016, we will be heading south to the Hilton St. Petersburg Bayfront in sunny Florida for our Spring Workshop. We will then return to the Hilton New Orleans Riverside for the Fall workshop in September. These two popular destinations always draw large crowds and opportunities to network with your colleagues from around the world. So, please join us in 2016 to learn, network, and better prepare for success in the future.



SPRING Conference & Workshop

APRIL 17-20

**St. Petersburg, FL
Hilton St. Petersburg Bayfront**



FALL Conference & Workshop

SEPTEMBER 18-21

**New Orleans, LA
Hilton New Orleans Riverside**



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Vision & Mission

EUCG, Inc. A global association of utility professionals and member companies which is recognized as the electric energy industry source for performance information.

To assist member companies in achieving excellence by providing relevant, accurate and timely benchmark information on cost, performance and best practices.