



AppalachianVoices

1

August 19, 2022

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Opposition to Tennessee Gas Pipeline Company's application and request for an extension of the comment and intervention period for docket number CP22-493-000.

Dear Secretary Bose,

On behalf of Appalachian Voices and the signatories below, please find the enclosed comment, signed by 475 individuals, including 174 personalized messages, in response to Tennessee Gas Pipeline Company's application for the Cumberland Project.

Thank you for time and consideration of our comments.

Sincerely,

Brianna Knisley
Tennessee Campaign Manager
brianna@appvoices.org

Dear Secretary Bose,

I am writing to express my opposition to Tennessee Gas Pipeline Company's application for constructing a 32-mile pipeline across Dickson, Houston and Stewart counties in Tennessee, under docket number CP22-493-000.

The proposed pipeline poses a major threat to public safety and local habitat in communities that have already been overburdened with fossil fuel infrastructure. For instance, the Cumberland Pipeline would cross over 130 streams and 6 wetlands, threatening to destroy habitat for plants and wildlife. The land through which the pipeline would cross is also full of karsts, which increases the risks of water pollution and reduced air quality associated with methane gas leaks. People along the proposed pipeline route were confronted with the dangers of methane gas in 1992 when a pipeline in Dickson, owned by Kinder Morgan, Inc., exploded and burned hundreds of acres and injured multiple people. Closer to Cumberland City, community members have endured decades of coal ash pollution in their air and water from one of the dirtiest coal plants in the country.

Historic cultural centers in the path of the proposed pipeline also make this project a major threat to environmental justice. For instance, the pipeline would cut through land that was established and settled by former slaves during the Reconstruction Period (1870-1875) in what is known as the Promise Land community in Charlotte, Tennessee. This site still contains a historic church and schoolhouse that could be threatened by the pipeline, which would also cross the road that provides access to the community.

Importantly, landowners along the 32-mile route are also at risk of major property loss and damage because of this proposal. For some landowners, this pipeline will cut through the middle of farms more than a century old, or be placed as close as thirty feet next to their houses.

Ultimately, this pipeline is unnecessary. If TVA does not invest ratepayer funds in a new gas-burning power plant the pipeline won't be built. The final decision for how to replace the Cumberland City Fossil Plant has not been made. In fact, the Environmental Protection Agency reviewed TVA's draft Environmental Impact Statement for replacing the Cumberland plant and found the analysis inadequate. In that 19-page comment, EPA also recommended that TVA NOT choose its current preferred gas option at all or without making modifications to the option. EPA pointed out that there are cleaner alternatives like energy efficiency, wind, solar, and battery storage that are not subject to the same price volatility as gas and that TVA should consider thoroughly for replacing the plant. The gas buildout would also leave rate payers subject to volatile gas prices. Replacing the Cumberland with a gas-burning plant would only create 25-30 permanent jobs. A recent study showed that investing in renewable energy and energy efficiency would create 739 long-term jobs and more than 4,000 temporary jobs.

Given the risks to the community and local environment posed by this project, FERC should issue a Notice of Schedule for Environmental Review and also conduct a full Environmental Impact Statement. I also request that FERC extend the intervention and comment period by at least 30 days for this project so that more impacted residents have a chance to preserve their rights and provide input.

Thank you for considering my comments.