



AppalachianVoices

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March 29, 2023

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

Re: Public comments in response to FERC's Draft EIS for Tennessee Gas Pipeline Company, LLC's Cumberland Project; docket number CP22-493-000.

Dear Secretary Bose,

On behalf of Appalachian Voices and eleven individual signatories, please see the comment below in response to FERC's Draft Environmental Impact Statement for Tennessee Gas Pipeline Company, LLC's Cumberland Project; docket number CP22-493-000.

This comment was signed by **11 individuals**, including **10 Tennessee residents**. In addition, **3 signers added personalized messages**. These signatures and personalized messages can be found on a separate spreadsheet attached to this comment submission.

Thank you for your time and consideration.

Sincerely,

Angie Mummaw
Middle Tennessee Organizer
Appalachian Voices
angie.mummaw@appvoices.org



To: Kimberly D. Bose, Secretary Federal Energy Regulatory Commission; the Tennessee Valley Authority

Thank you for receiving my comment on the Draft Environmental Impact Statement for Tennessee Gas Pipeline Company's Cumberland Project under Docket No. CP22-493-000.

Middle Tennessee does not need a new gas pipeline, and FERC's failure at this stage to evaluate whether there is a need for the proposed project renders this draft environmental impact statement incomplete. A new, 32-mile gas pipeline in Middle Tennessee would destroy private property, streams, wetlands, and prime farmland. The project threatens our drinking sources and streams with pollution and hydro morphology impacts during construction, and there are risks of gas leaks and explosions from pipeline operations. The use of eminent domain for the purpose of advancing the interests of private gas corporations like Kinder Morgan, especially without an assessment of need, is wrong.

In the Draft Environmental Impact Statement, FERC compares greenhouse gas emission calculations from the Tennessee Valley Authority's proposed combined cycle methane gas plant and 32-mile gas pipeline to TVA's "no action" alternative (or the continued operation of the Cumberland Fossil Plant). In this comparison, FERC relies on TVA's calculations of GHG emissions from the utility's self-conducted NEPA review to demonstrate that the pipeline project in question would reduce emissions, but then fails to compare the pipeline (and associated gas plant) project to renewable power alternatives. If FERC finds comparisons of TVA's gas and coal plant alternatives to be within the scope of this environmental review, the Commission should also include a GHG analysis and comparison of renewable energy alternatives to the Cumberland (pipeline) Project and associated combined cycle plant.

In addition, because the Environmental Protection Agency found TVA's greenhouse gas calculations to be insufficient, FERC should produce its own calculations for evaluating GHG emissions for all Cumberland plant alternatives.

As an impacted citizen, I am concerned that the National Environmental Policy Act review processes for both this pipeline project and associated combined cycle plant do not sufficiently quantify the impacts of the entire project. The deficiencies in this DEIS could result in significant harm to our climate and to the local environment, economy, and public health.

Thank you.