



AppalachianVoices

AppalachianVoices.org
outreach@appvoices.org

BOONE

589 West King Street
Boone, NC 28607
828.262.1500

CHARLOTTESVILLE

244 East High Street
Charlottesville, VA 22902
434.293.6373

KNOXVILLE

865.291.0083

NORTON

816 Park Ave NW
Norton, VA 24273
276.679.1691

November 7, 2023

Dear Tennessee Valley Authority Board of Directors,

With the retirement of its coal plants, TVA is in a significant period of transition that will not come again. We are writing to urge you to meet the challenge and opportunity of this moment by replacing the retiring Kingston and Cumberland coal plants with a clean energy portfolio instead of gas.

Tennessee Valley ratepayers rely on the Board of Directors to develop goals, policies, and plans for TVA. Most electricity users in the U.S. are served by utilities that are subject to public utilities commission oversight, but there is no public utilities commission that regulates TVA. This makes the Board of Directors' responsibilities particularly important. Among these are ensuring that TVA's actions are compliant with the utility's legal obligations, and that public input on economic and environmental issues are taken into account. For TVA's governance to work as designed, the board must take these responsibilities seriously.

In doing so, the board should actively seek information from sources beyond only TVA staff. Numerous third party studies have demonstrated that replacing TVA's coal with clean energy would result in lower costs, more jobs, cleaner environments, and, importantly, *equally reliable power*.¹ At the same time, federal agencies like the EPA and NPS have

¹ Knight, P., Frost, J., Fitch, T., Sinclair, E., Taberner, J., Griot, O., Havumaki, B., Smith, J., Metz, L., & Chavin, S. (2023). *TVA's Clean Energy Future: Charting a course to decarbonization in the Tennessee Valley*. Synapse Energy Economics, Inc. <https://www.biologicaldiversity.org/programs/energy-justice/pdfs/TVAs-Clean-Energy-Future.pdf>; Knisley, B., Luke, N., McIlmoil, R., & Barrett, J. (2022). *Save Energy, Grow Jobs in the Tennessee Valley: How investments in renewable and efficient resources could bring thousands of jobs to the TVA region*. Appalachian Voices. https://appvoices.org/resources/reports/TVA_Jobs_Report_07_14_22.pdf; Wilson, R., Addleton, I., & Taberner, J. (2022). *Clean Portfolio Replacement at Tennessee Valley Authority: Economic and Emissions Benefits for TVA Customers*. Synapse Energy Economics, Inc. https://www.synapse-energy.com/sites/default/files/TVA_Clean_Portfolio_Modeling_21-097_0.pdf



raised serious concerns about the cost and climate impacts of TVA's gas plans.²

Equitable clean energy development can be complex, involving many sites and people. But it is because of this reach that the possibilities for our communities are enormous.

With its strong union partnerships, TVA is well-positioned to ensure unions in our communities benefit from the provisions in the Inflation Reduction Act. TVA has an opportunity to become a national model for meaningfully involving workers in the energy transition. A real commitment to a just transition that centers working people could reinvigorate local economies, provide new pathways for energy resilience, create thousands of long-term jobs, and decrease electricity bills, especially for those with the highest energy burdens.

Despite this potential, TVA's solar ambitions over the next few years lag well behind its peers in the region. TVA is projected to have just 658 watts per customer of solar installed by 2026, compared to an average of 1,217 watts per customer for the 14 largest utility systems in the southeast.³ Meanwhile, TVA's lack of net energy metering makes rooftop solar unaffordable for most.

Right now, TVA's plans for Kingston and Cumberland threaten to pollute the same communities that have long carried the burden of coal-fired power production. In Harriman, TVA has proposed a new gas plant at the site of the largest industrial spill in U.S. history,⁴ the 2008 Kingston Coal Ash Spill – an environmental catastrophe that the utility was responsible for.

² Tennessee Valley Authority. (2023). *Kingston Fossil Plant Retirement: Draft Environmental Impact Statement*. (Appendix P); U.S. Environmental Protection Agency. (2023). *Re: EPA Comments on the Draft Environmental Impact Statement for the Kingston Fossil Plant Retirement, Roane County, Tennessee; CEQ No: 20230067*; U.S. Environmental Protection Agency. (2022). *EPA Comments on the Draft Environmental Impact Statement for the Cumberland Fossil Plant Retirement, Stewart County, Tennessee; CEQ No: 20220059*.

³ Southern Alliance for Clean Energy. (2023). *Solar in the Southeast, Sixth Annual Report*, p. 6. <https://cleanenergy.org/wp-content/uploads/Solar-in-the-Southeast-Sixth-Annual-Report.pdf>

⁴ Gaffney, A. (2020, December 15). A Legacy of Contamination: How the Kingston coal ash spill unearthed a nuclear nightmare. *Grist*. <https://grist.org/justice/tva-kingston-coal-ash-spill-nuclear/>

We believe deeply in the promise of public power that TVA represents. But this promise rings hollow if TVA's leaders do not react to the thousands of public comments opposing these gas projects. If the board does not change course, its legacy could become overseeing the largest gas buildout of all major utilities in the U.S by 2030.⁵ What if, instead, TVA returned to its mission to make life better for people in the Tennessee Valley?

Organizations and agencies are ready to support TVA's just transition to clean energy. Please do not accept gas replacements for the Kingston and Cumberland Fossil Plants, and instead use your power to insist on a clean and equitable energy future.

Thank you for considering our comments.

Sincerely,



Gabrielle Lichtenstein
Tennessee Energy Democracy Field Coordinator
Appalachian Voices

⁵ Morrisroe, C. (2023, October 10). Dirty Truth Report: TVA Worst in the Nation for Planned Methane Gas. *Sierra Club*. <https://www.sierraclub.org/press-releases/2023/10/dirty-truth-report-tva-worst-nation-planned-methane-gas>