

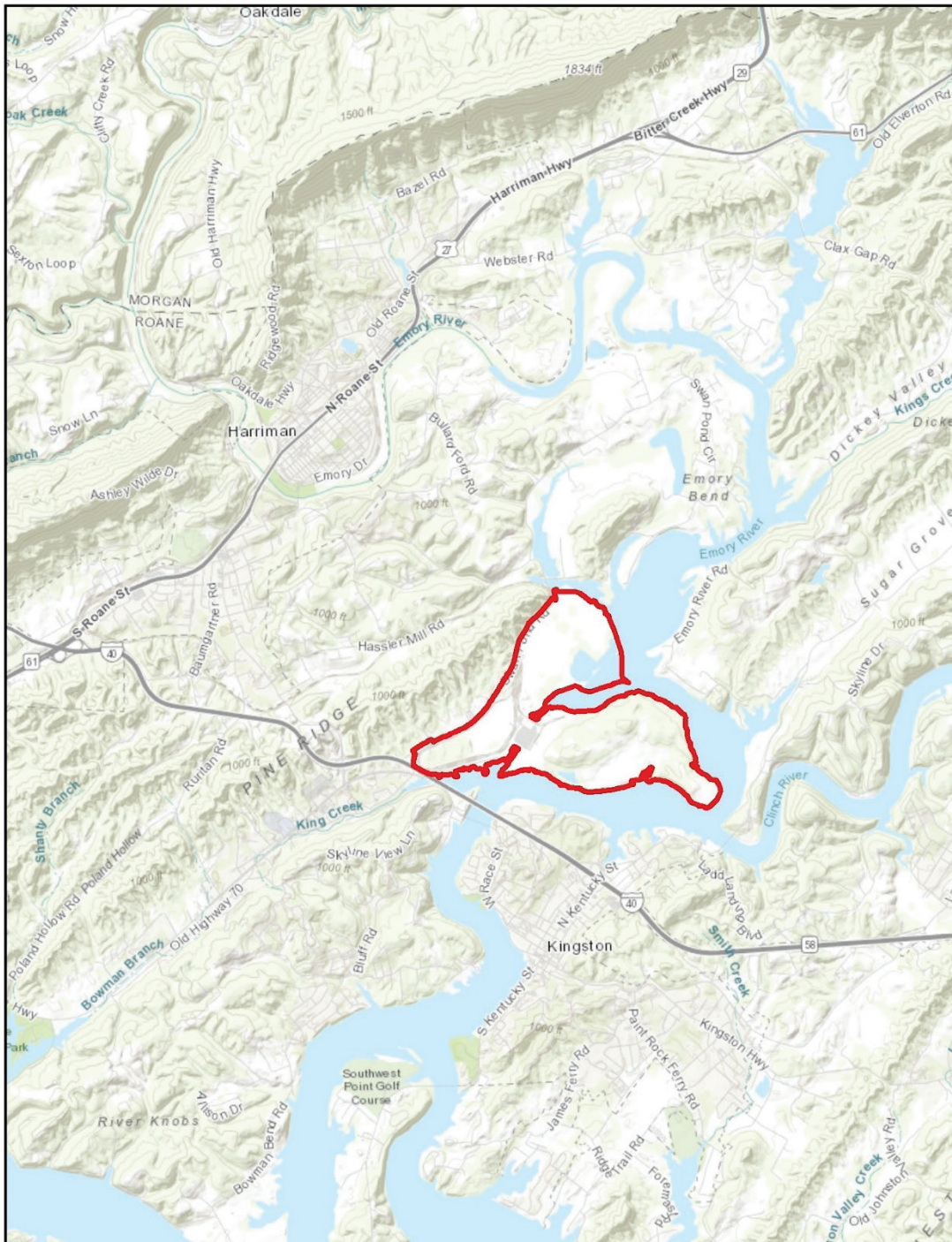
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KIF Retirement EIS  
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# Kingston Fossil Plant Retirement EIS

## SCOPING REPORT

OCTOBER 1, 2021



TENNESSEE VALLEY AUTHORITY



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## Scoping Report Executive Summary

The Tennessee Valley Authority (TVA) is preparing an environmental impact statement (EIS) on the proposed retirement and subsequent demolition of the nine coal-fired units at the Kingston Fossil Plant (KIF) in Harriman, Roane County, Tennessee and the construction and operation of facilities to replace the retired generation. The existing KIF plant is on a large reservation of approximately 1,255 acres situated on a peninsula formed by the confluence of the Clinch and Emory rivers.

In June 2019, TVA published the 2019 Integrated Resource Plan (IRP), which was developed with input from stakeholder groups and the general public. The 2019 IRP evaluated six scenarios (plausible futures) and five strategies (potential TVA responses to those futures) and identified a range of potential resource additions and retirements throughout the TVA power service area, which encompasses approximately 80,000 square miles covering most of Tennessee and parts of Alabama, Georgia, Kentucky, Mississippi, North Carolina, and Virginia. The target supply mix adopted by the TVA Board through the 2019 IRP included the potential retirement of 2,200 megawatts (MW) of coal-fired generation by 2038. The IRP acknowledged continued operational challenges for the aging coal fleet and included a recommendation to conduct end-of-life evaluations during the term of the IRP to determine whether retirements greater than 2,200 MW would be appropriate.

Following the publication of the IRP, TVA began conducting these evaluations to inform long-term planning. TVA's recent evaluation confirms that the aging coal fleet is among the oldest in the nation and is experiencing deterioration of material condition and performance challenges. The performance challenges are projected to increase because of the coal fleet's advancing age, the difficulty of adapting the fleet's generation within the changing generation profile, and, in general, because the coal fleet is contributing to environmental, economic, and reliability risks.

TVA anticipates that the scope of the EIS will include various alternatives in addition to the no action alternative (continuing to operate KIF with needed upgrades to meet regulatory requirements). TVA

plans to consider three action alternatives in the EIS: (A) Retirement of KIF and construction and operation of a Combined Cycle Combustion Turbine (CC) Gas Plant paired with a dual-fuel Simple Cycle Combustion Turbine (CT) Gas Plant at the same site; (B) Retirement of KIF, investment in local and regional transmission, and construction and operation of two Simple Cycle CT Gas Plants at alternate locations; (C) Retirement of KIF and construction and operation of Solar and Storage Facilities, primarily at alternate locations. Potential connected actions, such as the natural gas pipeline and transmission upgrades that are necessary for any particular alternative, will also be considered in this assessment. Whether these or other alternatives are reasonable warranting further consideration under the National Environmental Policy Act (NEPA) would be determined in the course of preparing the EIS.

NEPA requires federal agencies to consider the potential environmental consequences of proposed actions. The NEPA review process is intended to help federal agencies make decisions based on an understanding of a proposed action's impacts and, if necessary, to take steps that protect, restore, and enhance the environment. NEPA also requires that federal agencies provide opportunities for public involvement in decision making. One of those opportunities is through the public scoping process. TVA initiated a 30-day public scoping period on June 15, 2021, when it published a Notice of Intent (NOI) in the *Federal Register* announcing its plan to prepare an EIS. During the scoping period, June 15, 2021 to July 15, 2021, the public provided input to help TVA identify issues of concern and to help lay the foundation for development of the EIS. In particular, TVA requested comments on other reasonable alternatives that should be assessed in the EIS. This scoping report will be available to the public on the TVA project website and presents the public comments received, as well as information on how the EIS is being developed.

During the EIS scoping period, TVA received comments from three federal agencies, three state agencies, ten non-governmental organizations, and private individuals including local landowners. Comments about the EIS process were related to

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alternatives, land use, water resources, biological resources, greenhouse gas (GHG) emissions, cultural resources, socioeconomic and environmental justice impacts, and cumulative effects. This scoping report, prepared to identify the components specified in 18

CFR Section 1318.402(g), also includes information about NEPA, federal and local laws, and executive orders (EOs) that are relevant to the impacts assessed in this EIS.



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### List of Acronyms

ACM	Asbestos Containing Material
ARAP	Aquatic Resource Alteration Permits
BMP	Best Management Practice
CC	Combined Cycle Combustion Turbine
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
CT	Simple Cycle Combustion Turbine
DER	Distributed Energy Resources
EIS	Environmental Impact Statement
EO	Executive Order
FERC	Federal Energy Regulatory Commission
GHG	Greenhouse Gas
IRP	Integrated Resource Plan
KIF	Kingston Fossil Plant
MW	Megawatt
NEPA	National Environmental Policy Act
NHA	National Heritage Area
NHPA	National Historic Preservation Act
NHT	National Historic Trail
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NOI	Notice of Intent
OBED	Obed Wild and Scenic River
ROW	Right-of-Way
SELC	Southern Environmental Law Center
SOCM	Statewide Organizing for Community eMpowerment
TN	Tennessee
TDEC	Tennessee Department of Environment and Conservation
TIPL	Tennessee Interfaith Power and Light
TVA	Tennessee Valley Authority
U.S.	United States
USEPA	U.S. Environmental Protection Agency

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# Scoping Report

## 1 Introduction

The Tennessee Valley Authority (TVA) is a self-financed, wholly owned corporate agency of the United States (U.S.) that serves a region that consists of parts of seven southeastern states. As a public power entity, TVA has no shareholders and receives no tax dollars. Under the TVA Act of 1933, as amended, Congress charged TVA with advancing the social and economic well-being of the residents of the Tennessee (TN) Valley region.

TVA produces or obtains electricity from a diverse portfolio of energy sources, including solar, hydroelectric, wind, biomass, fossil fuel, and nuclear. In June 2019, TVA published the 2019 Integrated Resource Plan (IRP) and associated Environmental Impact Statement (EIS), which were developed with input from stakeholder groups and the public. The IRP evaluated six scenarios (plausible futures) and five strategies (potential TVA responses to those futures) and identified a range of potential resource additions and retirements throughout the TVA power service area, which encompasses approximately 80,000 square miles covering most of TN and parts of Alabama, Georgia, Kentucky, Mississippi, North Carolina, and Virginia. The target supply mix adopted by the TVA Board through the 2019 IRP included the potential retirement of 2,200 megawatts (MW) of coal-fired generation by 2038.

As recommended in the 2019 IRP, TVA conducted end-of-life evaluations for aging fossil units to inform long-term planning. The recent evaluations confirmed that the aging coal fleet is among the oldest in the nation and is experiencing deterioration of material condition and performance challenges. The performance challenges are projected to increase because of the coal fleet's advancing age and the difficulty of adapting the fleet's generation within the changing generation profile; and, in general, because the coal fleet is contributing to environmental, economic, and reliability risks.

The Kingston Fossil Plant (KIF) is located on 1,255 acres situated on a peninsula formed by the confluence of the Clinch and Emory Rivers at the Clinch River in Harriman, Roane County, Tennessee,

approximately 35 miles west of downtown Knoxville (Figure 1). Built between 1954 and 1955, the nine-unit, coal-fired steam generating plant has a summer net capability of 1,398 MW.

The intensive cycling of KIF units (or swinging of the generation load from high to low), reflected in start-up/shutdown events averaging greater than 85 times per year, is outside the intended design basis of the plant. Further, KIF has been dealing with significant material condition issues over the last five years. Lower boiler drum repairs at KIF are symptomatic of age-driven material condition failures that are difficult to proactively address. Based on this analysis, TVA has developed planning assumptions for KIF retirement. TVA proposes to retire three units as early as 2026, but no later than 2031, and the remaining six units as early as 2027, but no later than 2033, dependent on internal and external factors that could affect bringing replacement generation online. The timing of new gas generation must be coordinated with the retirement of the KIF coal units to meet system capacity needs, and in some cases avoid issues with air and other permitting as well as transmission limitations.

The Kingston EIS will assess the impact of retiring all KIF units and of replacing the generation of those units, as discussed in the Alternatives section below. To recover the generation capacity lost from retirement of the KIF units and to account for future load growth, TVA is proposing the addition of approximately 1,500 MW of replacement generation (approximately 50 MW greater than proposed in the NOI based on refinements made to the proposed alternatives). To maintain adequate reserves on the TVA system, this 1,500 MW of replacement generation would need to be in commercial operation prior to the retirement of KIF. Additionally, following the TVA Board-approved retirement of Bull Run Fossil Plant in 2023, KIF will have an increasingly vital role in ensuring transmission grid stability in northeast Tennessee. Transmission system upgrades and/or regional replacement generation must be in place prior to the retirement of the final six units at KIF.



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Additional tiered National Environmental Policy Act (NEPA) analysis will be completed as these future generation needs are identified.

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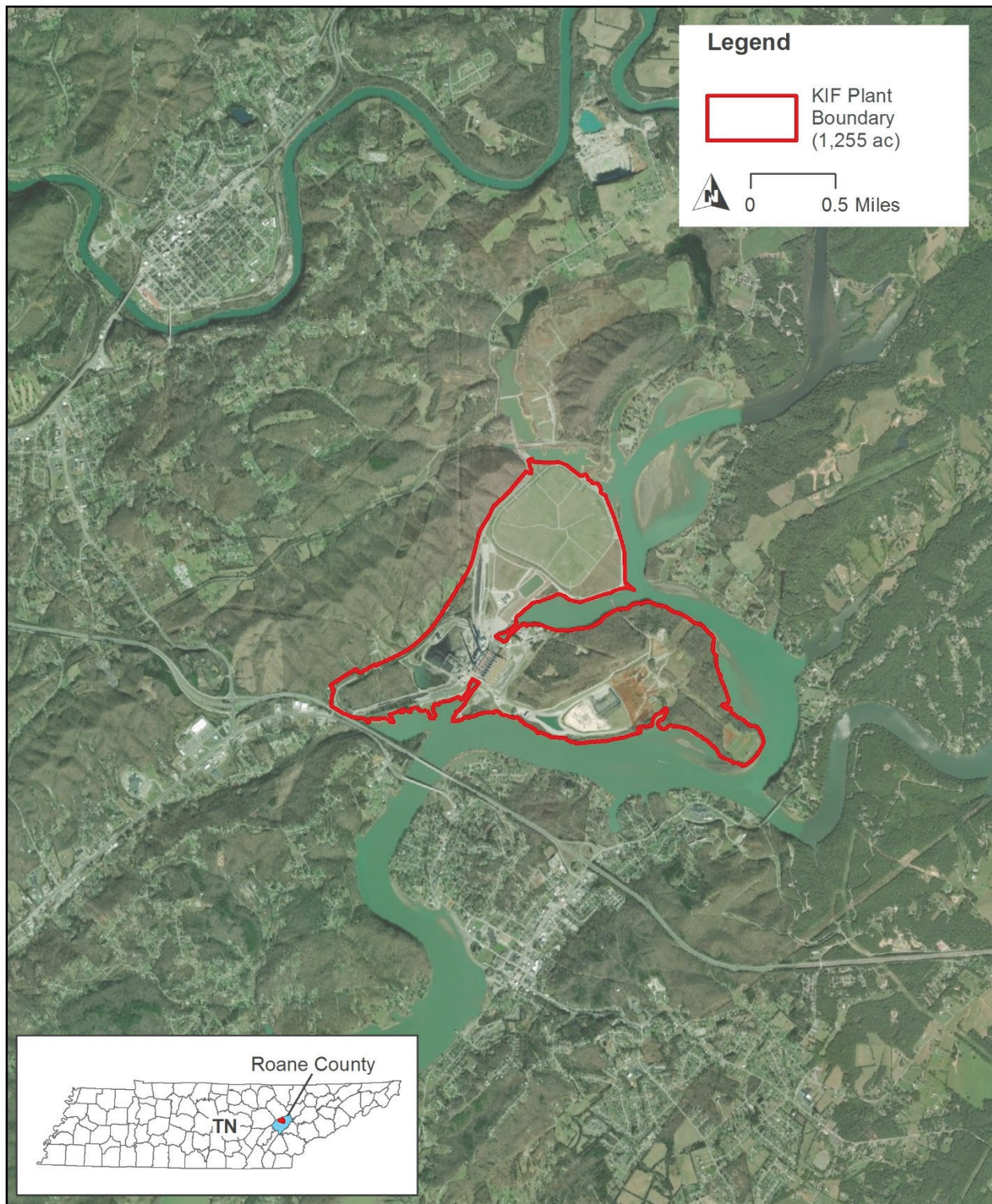


Figure 1. KIF Plant Location and Reservation Boundary

# Scoping Report

## 2 Purpose and Need

TVA's asset strategy incorporates the strategic direction from the 2019 Integrated Resource Plan and continues to support affordable, reliable, and cleaner energy for the customers we serve. Alternatives to be studied as part of this EIS are one piece of the overall asset strategy, which also includes:

- Maintaining the existing low-cost, carbon-free nuclear and hydro fleets
- Retiring aging coal units as they reach the end of their useful life, expected by 2035
- Adding 10,000 MW of solar by 2035 to meet customer and system needs, complemented with storage
- Using natural gas to enable needed coal retirements and solar expansion as other technologies develop
- Leveraging demand-side options, in partnership with local power companies
- Partnering to develop new carbon-free technologies for deeper decarbonization

TVA utilizes least-cost planning in the development of its asset strategy in order to provide electricity at the lowest feasible rate for our customers. As a result of resource changes outlined in the asset strategy, TVA has a plan for 70 percent carbon reductions by 2030, a path to ~80 percent carbon reductions by 2035 (based on a 2005 baseline), and an aspiration to achieve net-zero carbon emissions by 2050.

The target supply mix adopted by the TVA Board through the 2019 IRP included the potential retirement of 2,200 MW of coal-fired generation by 2038. TVA's 2019 IRP and associated EIS acknowledged continued operational challenges for the aging fossil units and included a recommendation to conduct end-of-life evaluations on TVA's remaining fossil plants during the term of the IRP to determine whether retirements greater than 2,200 MW would be appropriate. Based on the end-of-life evaluations, which indicated that the aging coal fleet, is contributing to environmental, economic, and reliability risks, TVA has established retirement planning assumptions for all remaining coal units.

TVA will perform further environmental reviews to evaluate the impact of retiring the balance of the coal fleet by 2035.

As discussed in the Introduction, the intensive cycling and material condition issues of the KIF units led TVA to develop planning assumptions for KIF retirement. The Proposed Action would provide cost-effective replacement generation consistent with the IRP and TVA goals. The purpose of the subject EIS is to address the potential environmental effects associated with the proposed retirement and demolition of nine KIF units and addition of replacement generation, versus taking no action.

## 3 Alternatives

TVA anticipates that the scope of the EIS will include various alternatives in addition to the No Action Alternative (continuing to operate KIF). For each of the action alternatives, the EIS will also analyze the demolition of the KIF plant. In addition to a No Action Alternative (continue to operate KIF in Harriman, TN) as described in Section 3.1, TVA plans to consider at least three action alternatives in the EIS, described in more detail in Sections 3.2 through 3.4. Whether these or other alternatives are reasonable, warranting further consideration under NEPA, would be determined while preparing the EIS. Connected actions, such as the natural gas pipeline and transmission upgrades, will also be considered in this assessment.

### 3.1 No Action Alternative

Under the No Action Alternative, the TVA would continue to operate KIF in Harriman, Roane County, TN. Existing conditions (land use, natural resources, visual resources, physical resources, and socioeconomics) on the Project Site, and in the vicinity, would remain unchanged. TVA would continue to operate the nine-unit, coal-fired steam-generating plant with no changes. TVA would continue to implement plant upgrades necessary to comply with Effluent Limitation Guidelines.



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### 3.2 Action Alternative A

Under Action Alternative A, TVA would retire KIF, demolish and restore the site, and construct and operate a Combined Cycle Combustion Turbine (CC) Gas Plant paired with a dual-fuel Simple Cycle Combustion Turbine (CT) Gas Plant at the same 1,255-acre site in Harriman, Roane County, TN.

Natural gas-fired CC plants are efficient intermediate units with large energy potential as well as the ability to provide grid support and follow load. CCs are composed of one or more natural gas-fired CT generating units which are paired with heat recovery steam generators and one or more steam turbines for increased efficiency and power output. Natural gas-fired simple cycle CT plants are peaking units with the ability to start and ramp quickly on short notice as well as the ability to provide grid support and follow load. Simple Cycle CT plants are composed of multiple natural gas-fired CT generating units.

Both CCs and CTs are fully dispatchable year-round with the ability to ramp up and down throughout the day. This ability to ramp up and down throughout the day is increasingly important as TVA works towards integrating about 10,000 MW of solar by 2035. CTs typically have the lowest installed capital cost per MW and offer flexibility to assist in the integration of renewable resources. Their high fuel efficiency, relatively low construction cost, and flexibility of CCs and CTs lend them to be good candidates for intermediate and baseload operations.

KIF plays a critical role in supporting the Knoxville and northeastern Tennessee transmission grid, especially with the planned retirement of the Bull Run Fossil Plant in 2023. During the scoping period, TVA performed additional risk assessments in light of recent extreme winter events and pipeline disruptions, given the critical role that generation at this site would play in ensuring regional grid reliability. As a result, TVA determined that the proposed CC replacement generation resulted in two key resiliency concerns. First, generation outage risk during extreme weather conditions would be increased due to the overall reduction in combustion units at the site (nine coal

units down to two gas combustion units as part of the CC). Second, fuel supply availability risk would be increased due to the CC plant's reliance on gas pipeline infrastructure for the instantaneous flow of gas to the site. Although low probability, if one of these high impact risks were to result in total loss of output from Kingston, then TVA could be at risk of firm load shed (load loss) in the region. As such, Alternative A has been adjusted to include a smaller CC plant paired with dual-fuel simple cycle CT units to increase resiliency and enhance regional reliability while maintaining approximately the same total site power output to meet system capacity requirements.

Replacing generation at the KIF location with a combined CC and CT gas plant would require the construction of an approximately 125-mile-long natural gas pipeline to bring gas supply to the KIF reservation, as well as the construction of on-site storage for Ultra Low Sulfur Distillate #2 fuel oil and a tanker truck unloading terminal. The EIS will include discussion and review of natural gas pipeline(s) proposed as a necessary component of the new proposed gas plant under Alternative A. The construction of the natural gas pipeline(s) would be subject to Federal Energy Regulatory Commission (FERC) jurisdiction and additional review will be undertaken by FERC in accordance with its own NEPA procedures.

All action alternatives may also require issuance of an Individual or Nationwide Permit under Section 404 of the Clean Water Act; Section 401 Water Quality Certification; conformance with Executive Orders (EOs) on Environmental Justice (12898), Wetlands (11990), Federal Flood Risk Management Standard (13690), Migratory Birds (13186), and Invasive Species (13112); and compliance with Section 106 of the National Historic Preservation Act, Section 7 of the Endangered Species Act, and other applicable local, federal and state regulations. Additional details on applicable laws and regulations are provided in Table 1.

### 3.3 Action Alternative B

Under Action Alternative B, TVA would retire the KIF, demolish and restore the site, and construct and

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operate two Simple Cycle Combustion Turbine (CT) gas plants at alternate locations. Preliminary locations include Kemper, MS; Southaven, MS; Lagoon Creek, TN; Gleason, TN; Johnsonville, TN; and Gallatin, TN. All preliminary locations are existing TVA sites.

As described in Alternative A, natural gas-fired simple cycle CT plants are peaking units with the ability to start and ramp quickly on short notice as well as the ability to provide grid support and follow load. CTs are fully dispatchable year-round with the ability to meet capacity needs during short periods. CTs typically have the lowest installed capital cost per MW and offer flexibility to assist in the integration of renewable resources, which is increasingly important as TVA works towards integrating about 10,000 MW of solar by 2035.

Alternative B would likely require upgrades to two plant sites and would also require extensive upgrades to regional transmission around the Knoxville and northeastern Tennessee region. For the purposes of the EIS, a high-level analysis will be performed of the impacts of this action, with site-specific NEPA reviews to be followed at a later date if this alternative is selected by TVA.

### 3.4 Action Alternative C

Under Action Alternative C, TVA would retire the KIF, demolish and restore the site, and construct and operate Solar and Storage Facilities, primarily at alternate locations.

Utility-scale solar costs have fallen substantially over the past 10 years, with forecasts indicating continued declines in real dollars throughout the balance of the decade. Depending on the configuration, technology employed, and other factors, in-Valley utility-scale solar farms can expect a 20-27% capacity factor. While relatively inexpensive on a cost per MWh basis, solar farms are not dispatchable and generation is intermittent in nature, varying by time of day, weather, and season. TVA's base asset strategy currently includes the addition of about 10,000 MW of solar by 2035; therefore, any solar additions tied to the replacement of KIF would be in addition to this base

assumption. In order to provide dependable peak capacity needs for the TVA system, solar generation must be paired with dispatchable resources, such as storage or gas. Battery energy storage systems (BESS) typically represent one of the lowest cost storage options today. While lithium-ion technology is most common, other technologies continue to be explored. BESS setups include a capacity output rating in MW along with an energy rating in MWh, which are customizable at each facility. Dividing the energy rating by the capacity rating provides the number of hours of duration that can be expected from the system at full output. Many utilities have found that four-hour BESS systems provide a good balance of price, output, and duration. The combination of utility-scale solar and battery storage would provide a carbon-free alternative to replacement of KIF.

Based on typical solar and storage configurations, it is anticipated that 20 or more of such facilities would be required to fulfill the required need resulting from the KIF retirement. During the EIS process, TVA will evaluate the amount of solar and storage required to meet reliably system capacity and energy needs. Under the proposed action, TVA would most likely issue a competitive request for proposal to procure and potentially operate the majority of the solar and storage facilities. It is anticipated that a portion of these 20 or more sites would need to be physically located in the northeast portion of TVA's service territory, in order to offset some of the required regional transmission system upgrades. For purposes of the EIS, an analysis of impacts of this action will be performed, with site-specific NEPA reviews to be followed at a later date if this alternative is selected by TVA.

The proposed action would likely require upgrades to all sites and also require extensive upgrades to transmission valley wide.

## 4 Environmental Review Process

NEPA requires federal agencies to consider and study the potential environmental consequences of



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proposed actions. Actions, in this context, can include new and continuing activities that are conducted, financed, assisted, regulated, or approved by federal agencies, as well as new or revised plans, policies or procedures. The NEPA review process is intended to help federal agencies understand a proposed action's impacts and thereby ensure informed decision making (40 Code of Federal Regulations [CFR] 1500.1). NEPA also requires that federal agencies provide opportunities for public involvement in the decision-making process.

TVA is initiating the preparation of an EIS to assess the environmental impacts of the Action Alternatives. TVA is using the input from the public scoping period, summarized below, in developing the Draft EIS. The Draft EIS will be distributed to interested individuals; groups; and federal, state, and local agencies for their review and comment. TVA also will send the Draft EIS to the U.S. Environmental Protection Agency (USEPA), which will publish a notice of its availability in the *Federal Register*. Following the 45-day public comment period for the Draft EIS, TVA will respond to the comments received and incorporate any necessary changes into the Final EIS. TVA will make a final decision regarding the Proposed Action after the Final EIS is published.

The completed Final EIS will be placed on TVA's website, and notices of its availability will be sent to those who received, or submitted comments on, the Draft EIS. TVA also will send the Final EIS to the USEPA, which will publish a notice of its availability in the *Federal Register*. TVA will then issue a Record of Decision, which will include (1) the decision; (2) the rationale for the decision; (3) alternatives that were considered; (4) the alternative that was considered environmentally preferable; and (5) associated mitigation measures and monitoring, and enforcement requirements. TVA expects to release the draft EIS in Summer of 2022. TVA anticipates issuing the Final EIS in Spring of 2023 and a Record of Decision at least 30 days after its release.

In accordance with 18 CFR Section 1318.402(g)(8), site-specific studies associated with the retirement and demolition of the KIF plant and alternatives will be delegated to TVA specialists and contractors. Detailed studies and analysis of the proposed 125-mile pipeline associated with Alternative A would be conducted by a separate contractor and additional review will be undertaken by FERC in accordance with its own NEPA procedures.

### 4.1 Applicable Federal Laws and Executive Orders

#### 4.1.1 National Environmental Policy Act

This EIS is being prepared by TVA in accordance with NEPA (42 U.S. Code §§ 4321 et seq.), regulations implementing NEPA analyses promulgated by the Council on Environmental Quality (40 CFR Parts 1500 to 1508), and TVA NEPA regulations and procedures (18 CFR Part 1318). For major federal actions with significant environmental impacts, NEPA requires that an EIS be prepared. This process must include public involvement and analysis of a reasonable range of alternatives.

#### 4.1.2 Other Laws and Executive Orders

Other laws and EOs that are relevant to the Action Alternatives as a federal action are shown in Table 1. These laws and orders may affect the environmental consequences resulting from the retirement of the KIF and the construction and operation of the replacement(s) generation, dependent on the alternative selected. They may also prescribe mitigation and minimization measures to implement during retirement and demolition, and for the construction and operation of the replacement generation. The Draft EIS will describe the regulatory setting for each resource in more detail.

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**Table 1. Laws and Executive Orders relevant to the Proposed Action.**

Environmental Resource Area	Law / Executive Order
Geology, Soils, and Prime Farmland	Farmland Protection Policy Act.
Water Resources	Administrative Code of Tennessee Department of Environment and Conservation (TDEC), Chapter 0400-04. Clean Water Act Sections 401, 402, and 404. EO 11988 – Floodplain Management. EO 13690 – Federal Flood Risk Management Standard EO 11990 – Protection of Wetlands. EO 13778 – Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the “Waters of the U.S.” Rule. Safe Drinking Water Act.
Biological Resources	Administrative Code of TDEC, Chapter 0400. Bald and Golden Eagle Protection Act. Endangered Species Act Section 7 (Consultation with U.S. Fish & Wildlife Service). EO 13112 – Invasive Species. EO 13186 – Responsibilities of Federal Agencies to Protect Migratory Birds. Migratory Bird Treaty Act.
Air Quality and Greenhouse Gas (GHG) Emissions	Clean Air Act. EO 14008 – Tackling the Climate Crisis at Home and Abroad.
Cultural Resources	Administrative Code of TDEC, Chapter 0400. National Historic Preservation Act Section 106 (Consultation with State Historic Preservation Office and tribes). Native American Graves Protection and Repatriation Act.
Waste Management	Administrative Code of TDEC, Chapter 0400. Comprehensive Environmental Response, Compensation, and Liability Act. Emergency Planning and Community Right-to-Know Act. Resource Conservation and Recovery Act. Solid Waste Disposal Act. Toxic Substances Control Act.
Public and Occupational Health and Safety	Occupational Safety and Health Act.
Environmental Justice	EO 12898 – Federal Actions to Address Environmental Justice in Minority and Low-Income Populations. EO 14008 – Tackling the Climate Crisis at Home and Abroad. EO 13166 - Improving Access to Services for Persons with Limited English Proficiency

## Scoping Report

### 4.2 Environmental Resources to Be Considered in EIS

Based on internal and public scoping, identification of applicable laws, regulations, EOs, and policies, TVA identified the resource areas listed below as requiring review in the EIS:

- Land use and recreation
- Geology, soils, and prime farmland
- Water resources, including groundwater, wetlands and surface water, and floodplains
- Biological resources, including natural areas, vegetation, wildlife, rare, threatened, and endangered species
- Visual resources
- Noise
- Air quality and climate change (emissions and GHGs)
- Cultural resources
- Utilities
- Waste management
- Public and occupational health and safety
- Transportation
- Socioeconomics
- Environmental Justice

No other environmental issues have been identified under 18 CFR Section 1318.402(g)(4) that should be mentioned but that will not be addressed in detail.

## 5 Public Outreach during Scoping Period

On June 15, 2021, TVA published a Notice of Intent (NOI) in the *Federal Register* announcing plans to prepare an EIS to assess the potential environmental effects associated with the proposed retirement of the nine coal-fired units at the KIF in Harriman, Roane County, TN and the construction and operation of facilities to replace the retired generation (Appendix A). The NOI initiated a 30-day public scoping period, which concluded on July 15, 2021. The NOI solicited public input on both the scope of the EIS and environmental issues that should be considered in the EIS. The purpose of the scoping period was to

present TVA's project objectives and initial alternatives for input from the public and interested stakeholders.

In addition to the NOI in the *Federal Register*, TVA invited members of the public as well as Federal, state, and local agencies and federally recognized Indian tribes to comment on the scope of the EIS. Information about this project was listed on TVA's web page at [www.tva.com/nepa](http://www.tva.com/nepa), which included a link to a virtual public meeting room and an online public comment page.

The virtual meeting room was hosted online for the duration of the scoping period and provided navigation to the following materials: welcome board and video, project purpose and need board, project alternatives map and detailed views, overview of NEPA and scoping board, a location to submit comments, information on the virtual scoping meeting, and links to other related websites. The virtual meeting room also contained text-accessible versions of the content.

TVA sent notification of the NOI via email to local and state government entities and federal agencies and posted flyers in local businesses. TVA published notices regarding the NOI in local newspapers (Appendix B), including the following cities and associated newspapers:

- Cookeville, TN – Cookeville Herald-Citizen
- Gainesboro, TN – Jackson County Sentinel
- Hartsville, TN – Hartsville Vidette
- Jamestown, TN – Fentress Courier
- Kingston, TN – Roane County News
- Knoxville, TN – Knoxville News-Sentinel
- Livingston, TN – Overton County News & Livingston Enterprise
- Wartburg, TN – Morgan County News

A virtual public scoping meeting was held on June 29, 2021 from 6:30pm to 8:00pm EDT via Adobe Connect. Fifty-one members of the public, agencies, and other organizations attended the meeting. TVA used comments submitted prior to and during the virtual public meeting to develop a list of Frequently Asked Questions, which has been posted onto the

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[TVA KIF Retirement EIS website](#). In accordance with 18 CFR Section 1318.402(h) of TVA's NEPA regulations, this scoping report will be available to the public on TVA's project website.

## 6 Summary of Public Scoping Comments

TVA received approximately 56 comments, a form letter from Sierra Club with 583 signatories, and a petition from Energy Alabama with 8 signatories. Comments were received from members of the general public, including potentially affected landowners, and from multiple organizations and agencies including:

- Appalachian Voices
- Center for Biological Diversity
- Energy Alabama
- Foundation for Global Sustainability
- National Parks Conservation Association
- National Park Service (NPS)
- Sierra Club
- Southern Alliance for Clean Energy
- Southern Environmental Law Center (SELC)
- Statewide Organizing for Community eMpowerment (SOCM)
- TN Citizens for Wilderness Planning
- TDEC
- Tennessee Interfaith Power and Light (TIPL)
- TN Senate Chamber
- U.S. Department of the Interior  
USEPA

Comment submissions are included in Appendix C and summarized in Section 6.1.

### 6.1 Scoping Commenters

#### 6.1.1 General Public

- Support for sustainable energy options.
- Support for specific alternatives and solutions for power generation replacement.
- Recommendation for an assessment of the environmental impacts related to additional hydraulic fracturing that would be needed to

- supply the incremental volume of gas required to operate a CC plant at KIF, including the subsequent release of methane into the atmosphere, impacts of flaring operations at gas wells, instability causing earthquakes and sinkholes; and impacts on water usage and wastewater discharges.
- Avoidance of pipeline leaks.
- Support for distributed infrastructure, focused on subsidizing homeowners and business owners to add solar panels and storage batteries and sell their excess electricity back to the TVA.
- Concern that the construction of a natural gas pipeline would attract protests from environmental groups, resulting in a negative image and attention to the city of Knoxville.
- Effects on historically disadvantaged communities and acquiring land through fair purchases instead of using eminent domain.
- EIS considerations should include potential changes to visual assets; air, water, and ground pollution; demolition, construction, and operation noise; and potential for major disaster affecting the public or the environment.
- Support for federal credits for clean energy development.
- Financial feasibility of incrementally replacing solar panels and storage equipment as innovations occur.
- Concerns about methane leaks associated with natural gas.
- Recommendation for TVA to explore the use of woody biomass or pellets to co-fire with coal.
- TVA should address and mitigate the effects of climate change in the project area through investments in clean energy.
- Concerns about the human health effects from coal byproducts.
- Inclusion of additional alternative energy sources such as wind power, geothermal, and methane gas capture from waste management facilities.
- Integration of solar into projects including a recommendation for TVA to consider how the

## Scoping Report

shade of solar panels has been leveraged for other uses.

- Recommendation for additional solar installations, using areas that are already cleared, such as under powerlines, as well as placing solar installations close to points of energy use to avoid losses in transport and storage.
- Incorporation of science-based carbon emission targets consistent with Executive Order 13990.
- The cost of carbon capture to CC or gas turbine plants and the impact to TVA customers.
- The costs associated with natural gas extraction and pipeline spills.
- The EIS should consider the potential impacts that would result if the KIF was not operable due to lack of gas supply from disruption, weather, threats, or malfunction.
- The EIS should evaluate the life-cycle analysis of solar panels
- EIS should discuss the disposal of wind turbines or solar panels after their use, regarding the contribution of heavy metals from solar materials, battery components, and subsequent landfill requirements.
- EIS should discuss the demolition of KIF and prevention of hazardous materials from being released to the waterways, the air, or the ground.
- The impact on fly ash currently stored on KIF site if a CC plant is built.
- Concern about the reliability of long-term fuel sources.
- Recommendation for TVA to slow natural gas deployment.
- Recommendation to use small modular reactors.

### 6.1.2 Potentially Affected Landowners

- Impact of continued operation of KIF on neighboring landowners, specifically, the air pollution from exhaust, and coal ash.
- Recommendation for TVA to remove all man-made structures from the plant area and

restore the site to the original natural condition for a public park or wildlife area.

### 6.1.3 Center for Biological Diversity

- The KIF EIS must fully and fairly consider alternatives providing for the rapid retirement of the plant and its replacement, to the extent necessary, with clean, renewable energy sources, including distributed energy resources (DER), storage and energy efficiency options, in order to comply with NEPA, 42 U.S.C. § 4321, et seq.
- TVA's existing alternatives for the KIF Retirement fail to achieve the rapid greenhouse gas reductions that are critical to addressing the climate crisis, and the EIS must fully address the GHG impacts of all reasonable alternatives.
- While TVA currently intends to consider one alternative prioritizing solar and storage facilities, the EIS must also account for the declining need for centralized TVA generation, including offsetting TVA generation with DER, storage, and energy efficiency improvements.
- TVA must consider renewable energy alternatives aligned with a "path to zero emissions" that would also reduce energy demand.
- TVA should look for opportunities to invest in the renewable energy technologies that will help reduce electricity prices and make those technologies even more cost-competitive in the coming years.
- TVA must consider a full range of renewable energy alternatives that would make replacement of TVA's coal power generation with other centralized energy systems, such as CC and CT gas plants, obsolete.
- TVA must compare the environmental impacts of investments that largely or completely rely on DER, storage and energy efficiency with the other options considered in the proposed EIS—including not only the cost of potential early retirement of fossil fuel resources and expansion of gas, but also the



## Scoping Report

social cost of carbon associated with keeping them running for many years to come.

- To meet its purpose of providing safe, clean, reliable, and affordable electricity to all its customers, TVA must add a critical action alternative accounting for declining demand for centralized TVA generation, including offsetting TVA generation with DER, storage, and energy efficiency improvements.
- TVA must meaningfully assess the impacts of GHG emissions by comparing impacts between the existing alternatives and one or more alternatives that chart a path to zero emissions.
- TVA must add the necessary alternative(s) discussed above that will advance its rapid transition to zero emissions, all the while considering—and informing the public about—the likely environmental outcomes under the different alternatives. In particular, under two of the currently considered alternatives, which propose gas replacements, TVA will continue to be one of the largest contributors to the GHGs that are fueling the climate crisis, and thus will continue to be responsible for the devastating impacts that are certain to come in the country and around the world as we continue to increase the concentrations of GHGs in the atmosphere.

### 6.1.4 Energy Alabama

- Submitted a petition with eight signatures of people who support TVA replacing KIF with clean energy instead of another gas plant and TVA investing in the future of the community and the workers who will be most impacted by this plant closure.

### 6.1.5 Foundation for Global Sustainability

- TVA should address the current climate change crisis through nimble management, focusing on cooperative, adaptive planning for more flexible, responsive operations.

- TVA should address a multitude of smaller investments that seek to attack problems from a diversity of facets.
- Support for distributed renewable energy generation and storage

### 6.1.6 National Park Service

- Request to be a Cooperating Agency on the EIS because there are areas under NPS jurisdiction or areas of expertise that are within the area of potential affect.

#### Resources of Interest

- *National Park System/Wild and Scenic Rivers*
  - Obed Wild and Scenic River (OBED) is a unit of the National Park System and the National Wild and Scenic River System. The NPS does not have authority to grant a right of way permit across OBED lands for the purpose of a natural gas pipeline. The pipeline would need to avoid federal lands within the OBED boundary as a result.
  - Section 7 of the Wild and Scenic Rivers Act could apply to stream crossings outside of the designated reaches of the Obed River, Emory River, Clear Creek, and Daddys Creek at OBED beyond its boundary, and a determination by the NPS under Section 7 may be required for this project.
  - The potential crossings of the Emory River and Campground Creek by the East Tennessee Natural Gas Pipeline in Alternative A are upstream and near the designated reach of the Emory River. The existing pipeline crossing of Susan Branch is similarly situated upstream and near Milligan Branch and the designated reach of the Obed River, and the same pipeline crosses many tributaries upstream and near the designated reach of Clear Creek,

## Scoping Report

- including Gut Branch, Little Clear Creek, Gordon Branch, Green Branch, Douglas Branch, White Creek, Little Creek, Four Mile Creek, and Bice Creek.
- *Land and Water Conservation Fund*
    - In a letter dated June 22, 2021, the TDEC Recreation Resource Division indicated to NPS that “with the limited local data from the information presented from TVA on all options, it cannot be determined exactly what [LWCF Act] Section 6(f)(3) protected land will be impacted. We do feel that based on the information from TVA, multiple Section 6(f)(3) protected parcels could be impacted by any of the options presented. Additional data on the local level will be needed to determine what, if any, Section 6(f)(3) protected land is impacted.”
    - Cummins Falls State Park is a LWCF-assisted site and could be affected by the natural gas pipeline that is part of Alternative A.
    - NPS also analyzed potential impacts to LWCF-assisted sites in the counties containing Alternative B potential locations in Tennessee and Mississippi.
      - In Tennessee, there are eighteen LWCF projects in Sumner County (Gallatin), eleven LWCF projects in Weakley County (Gleason), two LWCF projects in Humphreys County (Johnsonville), and one LWCF project in Haywood County (Lagoon Creek).
      - In Mississippi, there are three LWCF projects in Kemper County (Kemper) and none in De Soto County (Southaven). Impacts to any LWCF-assisted site(s) by any of the project alternatives would likely constitute an LWCF conversion that must be approved by the NPS.
  - *Nationwide Rivers Inventory*
    - Clear Creek, Crooked Fork Creek, the Emory River, White Creek, Spring Creek, the Blackburn Fork of the Roaring River, Flynn Creek, and Goose Creek are listed on the Nationwide Rivers Inventory administered by the NPS, and they could be crossed by the Tennessee Ridgeline pipeline that is part of Alternative A.
  - *National Historic Trails*
    - Alternative B Preliminary CT Site in Johnsonville, TN, is within one mile of the Water Route and within 1.5 miles of the Benge Route of the the Trails of Tears National Historic Trail (NHT).
    - The Reynoldsburg Ferry Site within the community of Johnsonville is a high potential site associated with the Trail of Tears NHT. A high potential site is defined in the National Trails System Act as, “those historic sites related to the route, or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use” (P.L. 90-543, as amended through P.L. 116-9, March 12, 2019).
  - *National Register of Historic Places*
    - The Officer Farmstead, Fort Blount-Williamsburg Site, and Averitt-Herod House are all National Register-listed properties that could be affected by the natural gas pipeline

# Scoping Report

- that is part of Alternative A. Many other NR-listed properties exist within the areas potentially affected by the project. TVA should complete the required steps under National Historic Preservation Act (NHPA) Section 106 in its analysis for the project, in particular, the identification of historic properties.
  - We also may find upon further review that it would be appropriate for the NPS to be a consulting party under NHPA.
- *National Heritage Areas*
  - The project is within the Tennessee Civil War National Heritage Area.

## 6.1.7 Sierra Club

Sierra Club submitted a form letter with 583 signatories, many of whom had personal comments advocating for solutions to replacement of the retired generation from KIF. The main content of the form letter is provided below:

- Thank you for taking comments on this important process that will impact how electricity in the Tennessee Valley is generated.
- I support TVA's decision to retire the polluting Kingston coal plant. Moving away from coal is a smart business decision that benefits our air, water, and climate. I also urge TVA to assist the communities that will be impacted by the plant's closure, including providing worker re-training and funding economic development initiatives.
- The same economics behind moving away from coal also support moving aggressively toward safe, cheap, abundant solar, increasing battery storage, and helping people lower their bills by making energy efficiency more accessible.
- Renewable energy is smarter and safer than fossil fuels, and it's known that it is the cheapest form of new electricity generation

across most of the U.S. That's why I oppose any plan that would trade coal for new gas plants and pipelines.

- New gas infrastructure would expose the people and businesses in the Tennessee Valley to another polluting fossil fuel that is risky for our health and environment, our climate, and for customers.

## 6.1.8 Southern Environmental Law Center

- Through a joint letter representing the SELC, Appalachian Voices, Energy Alabama, Sierra Club, Southern Alliance for Clean Energy, Tennessee Citizens for Wilderness Planning, National Parks Conservation Association, and Statewide Organizing for Community Empowerment, TVA was requested to:
  - Evaluate existing carbon-free distributed and utility-scale technologies, alone and in combination, as alternatives to KIF. These technologies include demand response, energy efficiency, distributed solar, utility-scale solar, onshore wind, and battery storage.
  - Accurately quantify the GHG emissions of any proposed gas plants using the Social Cost of Carbon.
  - Use appropriate tools to fairly identify environmental justice populations and must assess the disproportionate harm to specific communities.
  - Consider all site-specific impacts.

## 6.1.9 Tennessee Citizens for Wilderness Planning

- Specific pipeline routes for the proposed outlines should be stated in detail and marked on readable maps.

## 6.1.10 Tennessee Department of Environment and Conservation

- TDEC acknowledges that there is limited detail available in the NOI and plans to submit additional, detailed comments on planned activities upon release of a Draft EIS. TDEC also encourages the TVA to

# Scoping Report

consult with relevant local parties for actions which might be subject to local agency approval.

## Resources of Interest

- *Air Quality*
  - Asbestos removal and demolition notification.
  - Construction emissions.
  - Restrictions for construction equipment idling.
  - For any new air pollution sources that will be built as a result of this project, TDEC requires that an application for a construction permit be made not less than 90 days prior to the estimated start date of construction for minor new source review and not less than 120 days prior to the estimated start date of construction for new source review.
- *Cultural and Natural Resources*
  - Based on the information provided in the NOI, TDEC finds that no significant archaeological resources will be disturbed because of the planned activities, and the retirement of the KIF will not adversely affect cultural resources.
  - Any additional construction associated with potential alternatives could disturb archaeological resources and implementation of the proposed alternatives should be coordinated in consultation with the State Historic Preservation Office.
- *Water Resources*
  - TDEC notes that the TVA will need individual construction stormwater permits under the National Pollutant Discharge Elimination System (NPDES) permit program.
  - TDEC also notes that the TVA will need individual Aquatic Resource Alteration Permits (ARAP) for planned activities, including the possibility for multiple ARAPs depending on the alternative

selected and the number of construction sites.

## 6.1.11 Tennessee Interfaith Power and Light

- TVA should evaluate environmental issues such as the emissions of greenhouse gases, fuel consumption, air quality, water quality and quantity, waste generation and disposal, land use, ecological, cultural resources, transportation, visual and noise, and socioeconomic impacts and environmental justice.
- TIPL requests that the assessment of greenhouse gas emissions considers how those emissions will impact climate change in the 21st century, and how those emissions will impact the nation's goal of reducing our carbon emissions by 50 percent by 2050.
- Requests consideration of "socioeconomic impacts and environmental justice," including an assessment of impacts on jobs, and equitable access to clean renewable energy. The solar energy power sector is one of the fastest growing energy sectors in the United States and will continue to grow as solar energy projects become a normal way of generating.
- TVA should address concerns that the alternative to replace the KIF with a natural gas facility and pipeline will do little to reduce GHG emissions, will result in increased emissions of methane from pipeline leaks, will have adverse socioeconomic impacts, especially on vulnerable populations, and will not lead to an improved quality of life for the region's residents.
- TVA should investigate solar energy systems from other successful utilities, and re-commit itself to providing the region's customers with clean, renewable energy, which will save costs for energy consumers, provide jobs, improve our quality of life, reduce emissions, and provide a strong and demonstrable answer to the challenges of climate change in the 21st century.

## Scoping Report

### 6.1.12 Tennessee State Senator Ken Yager

- TVA should consider continued operation of KIF through regulatory updates.
- TVA should address how storage facilities can sustain service territory over a period of at least five days during a snowstorm or other transformational weather event.
- Expressed support for natural gas pipelines and investment in transmission upgrades.

### 6.1.13 United States Environmental Protection Agency

#### Resources of Interest

- *NEPA*
  - Alternatives are reasonable; however, some alternatives may warrant further consideration under NEPA and should be determined in the preparation of this EIS.
  - Please use the NEPAAssist tool (<https://www.epa.gov/nepa/nepassist>) and other more localized information when conducting the NEPA analysis. NEPAAssist combines multiple Geographic Information System and internet databases to help screen for environmental concerns.
- *Water Quality*
  - This proposed action has the potential to disturb a considerable amount of soil.
  - A state or county construction stormwater permit will be required before construction can begin.
  - Construction may impact nearby Clinch River or other surface water bodies and best management practices (BMPs) should be applied to protect these water bodies before and after construction.
  - Outfall monitoring and sampling should be analyzed alongside the impairment status of water bodies since base outfalls contribute to impairments.
- *Air Quality*
  - Project is within an air quality attainment area; however localized air quality impacts could occur during demolition and construction due to equipment exhaust and fugitive dust. The EPA recommends:
    - Implementing measures that reduce dust (by watering or application of other methods) and diesel emissions (such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies).
- *Environmental Justice*
  - Consistent with EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, the USEPA encourages TVA to ensure protected populations are not disproportionately or adversely impacted by the project.
  - The USEPA also encourages compliance with EO 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable.
  - The USEPA encourages the use of the EJSCREEN tool.
- *Energy and Recycling*
  - Efforts should be made to divert any recyclable materials such as concrete, steel and asphalt away from landfills and repurpose the material instead.
  - The appropriate NEPA document should also address potential environmental impacts to construction workers, to include the hazards of demolishing the older structures, such as from lead and asbestos latent materials.
  - Project management should consider sustainable building practices that utilize variable forms of proven renewable energy for the proposed project, for example, solar power for supplemental electricity and lighting for the, parking lots, or special buildings that may be proposed in the various projects.



# Scoping Report

## 6.1.14 United States Geological Survey

- No comment at this time.

## 7 Relevant Environmental Documents and Reviews

Several environmental documents and reviews are relevant to the proposed Project and are briefly discussed in the sections below.

### 7.1 Programs, Plans, and Policies

#### **TVA Integrated Resources Plan and EIS (July 2019)**

This programmatic EIS evaluated the potential impacts of TVA's long-term IRP which provides direction on how TVA can best meet future electricity demand. The 2019 IRP evaluated six scenarios (plausible futures) and five strategies (potential TVA responses to those futures) and identified a range of potential resource additions and retirements throughout the TVA power service area.

#### **TVA Natural Resource Plan (February 2020)**

This Supplemental EIS assessed the potential environmental, social, and economic impacts associated with implementing an updated Natural Resource Plan.

#### **TVA Aging Coal Fleet Evaluation (May 2021)**

This evaluation was performed to recommend near-term retirement planning assumptions to reflect practical timelines for replacement generation. The first draft of the evaluation was completed during Fiscal Year 2020, with refinements made in May 2021.

### 7.2 Power Generation – Coal and Gas

#### **KIF Borrow Site EA (January 2020)**

This EA evaluated TVA's proposal to construct a 62-acre borrow site on existing TVA property at KIF in order to cost effectively and efficiently support routine operations, as well as upcoming construction projects.

#### **Ash Impoundment Closure (June 2016)**

This programmatic EIS evaluated the closure of ash impoundments containing coal combustion residuals (CCR) at fossil fuel plants across the Tennessee Valley to support the implementation of TVA's goal to eliminate all wet CCR storage at its coal plants.

#### **Bottom Ash Dewatering Facility EA (March 2016)**

This EA evaluated the proposed design of a dewatering facility for the conversion of wet bottom ash generated at KIF to a dry CCR product in accordance with TVA's recommendation to convert the wet bottom ash management system at KIF to a dry storage system.

#### **Installation of Flue Gas Desulfurization System at Kingston Fossil Plant EA (April 2006)**

This EA evaluated a proposal to reduce sulfur dioxide emissions at KIF by installing flue gas desulfurization equipment that employs the wet limestone forced oxidation technology in response to the 1990 Clean Air Act requirements.

#### **Kingston Fossil Plant Alternative Coal Receiving Systems New Rail Spur Construction near the Cities of Kingston and Harriman, Roane County, TN (April 1999)**

This EIS evaluated the elimination of two heavily used railroad-highway intersections and receive coal deliveries via the existing rail line with minor upgrades. In addition, this EIS evaluated the construction of a new high-speed coal unloading/loading system in its existing coal yard at KIF.

## Scoping Report

### 8 Potential Mitigation Measures

Most comments received during the scoping period did not identify specific mitigation measures for the Proposed Action. Minimization and mitigation measures were provided by TDEC and the USEPA as recommendations regarding demolition materials in lieu of open burning, diversion of recyclable materials to beneficial uses, and general permitting and BMP guidance regarding cultural, air, and water resources with potential to be impacted by the project.

TVA's siting processes for generation and transmission facilities, as well as practices for modifying these facilities, are designed to avoid and/or minimize potential adverse environmental impacts. Potential impacts also are reduced through pollution prevention measures and environmental controls such as air pollution control systems, wastewater treatment systems, and thermal generating plant cooling systems. Other potentially adverse impacts can be mitigated by measures such as compensatory wetlands mitigation, payments in lieu stream mitigation programs and related conservation initiatives, enhanced management of other properties, documentation and recovery of cultural resources, and infrastructure improvement assistance to local communities.

TVA would implement minimization and mitigation measures in relation to resources potentially affected by the Project. These would be developed with consideration to BMPs, permit requirements, and adherence to erosion and sediment control plans. TVA would utilize standard BMPs to minimize erosion during construction, operation, and maintenance activities. These BMPs are described in *A Guide for Environmental Protection and BMPS for TVA Construction and Maintenance Activities – Revision 3* (TVA's BMP Manual), the *Tennessee Erosion and Sediment Control Handbook*; and the Mississippi Handbook for Erosion Control, Sediment Control and Stormwater Management.

In association with the potential construction of an action alternative, TVA would employ standard

practices and specific routine measures to avoid and minimize impacts to resources. During development of the EIS, TVA would consider implementation of the following minimization and mitigation measures in relation to potentially affected resources:

#### Soils

Install silt fence along the perimeter of vegetation-cleared areas, implement other soil stabilization and vegetation management measures to reduce the potential for soil erosion during site operations, and try to balance cut-and-fill quantities to alleviate the transportation of soils offsite during construction.

#### Water Resources

Comply with the terms of the erosion and sediment control plans prepared as part of the NPDES permitting process; use BMPs for controlling soil erosion and runoff, such as the use of buffer zones surrounding perennial and intermittent streams and wetlands and the installation of erosion control silt fences and sediment traps; and implement other routine BMPs as necessary, such as non-mechanical tree removal within surface water buffers, placement of silt fence and sediment traps along buffer edges, selective herbicide treatment to restrict application near receiving water features, and proper vehicle maintenance to reduce the potential for adverse impacts to groundwater.

#### Biological Resources

Revegetate with native and/or noninvasive vegetation, including pollinator species, to reintroduce habitat, reduce erosion, and limit the spread of invasive species. Follow U.S. Fish and Wildlife recommendations regarding biological resources and pollinator species: use of timer- and/or motion-activated downward facing lighting to limit attracting wildlife, particularly migratory birds and bats; instruct personnel on wildlife resource protection measures, including applicable federal and state laws such as those that prohibit animal disturbance, collection, or removal, the importance of protecting wildlife resources, and avoiding plant disturbance; and avoid direct impacts to migratory birds and federally listed tree roosting bats by clearing trees and shrubs, as practicable, in winter months outside of nesting season and summer roosting season, respectively.

# Scoping Report

## Waste Management

Develop and implement a variety of plans and programs to ensure safe handling, storage, and use of hazardous materials.

## Public and Occupational Health and Safety

Implement BMPs for site safety management to minimize potential risks to workers.

## Transportation

Implement staggered work shifts during daylight hours and a flag person during the heavy commute periods to manage construction traffic flow near the Project Site(s).

## Noise

Limit construction activities primarily to daytime hours and ensure that heavy equipment, machinery, and vehicles utilized at the Project Site meet all federal, state, and local noise requirements.

## Air Quality and GHG Emissions

Comply with local ordinances or burn permits if burning of vegetative debris is required and use BMPs such as periodic watering, covering open-body trucks, and establishing a speed limit to mitigate fugitive dust.

TVA employs standard practices when constructing, operating, and maintaining transmission lines, structures, and the associated right-of-way (ROW) and access roads. Some of the more specific routine measures that would be taken to reduce the potential for adverse environmental effects during the proposed retirement of the KIF and construction, maintenance, and operation of facilities to replace part of the retired plant are as follows:

- To minimize the introduction and spread of invasive species in the ROW, access roads, and adjacent areas, TVA would follow standard operating procedures consistent with EO 13112 (Invasive Species) for revegetating the areas with noninvasive plant species as defined by TVA.
- Streams that could be affected by the proposed construction would be protected by implementing standard BMPs as identified in

TVA's BMP manual and the *Tennessee Erosion and Sediment Control Handbook*.

- In areas requiring chemical treatment, only USEPA-registered and TVA approved herbicides would be used in accordance with label directions designed, in part, to restrict applications near receiving waters and to prevent unacceptable aquatic impacts.
- To minimize adverse impacts on natural and beneficial floodplain values, the following mitigation measures would be implemented:
  - BMPs would be used during construction activities; and
  - Construction activities would adhere to the TVA subclass review criteria for transmission line location in floodplains.

TVA will assess reduction in GHG emissions as a result of retirement of KIF coal units and evaluate the best methods to reduce GHG emissions from any replacement generation.

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## Appendices

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# A

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## Appendix A – *Federal Register* Notice of Intent

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400 West Summit Hill Drive, Knoxville, Tennessee 37902

June 8, 2021

Office of the Federal Register  
7 G Street, NW, Suite A-734  
Washington, DC 20401

Dear Sir or Madam:

**NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT –  
KINGSTON FOSSIL PLANT RETIREMENT**

Enclosed are three signed originals of the subject Notice by the Tennessee Valley Authority which we request to be published in the Federal Register as soon as possible. This is to certify that the Final KIF Retirement NOI 06\_02\_21.docx file furnished with the enclosed notice is a true copy of the original signed document.

If you have any questions, please contact me at [REDACTED] or [cwilliams1@tva.gov](mailto:cwilliams1@tva.gov).

Sincerely,

Chevales Williams  
NEPA Specialist

Enclosures



- *Form Number:* DS-261.
  - *Respondents:* Beneficiaries of approved immigrant visa petitions.
  - *Estimated Number of Respondents:* 11,000.
  - *Estimated Number of Responses:* 11,000.
  - *Average Time per Response:* 10 minutes.
  - *Total Estimated Burden Time:* 1,833 hours.
  - *Frequency:* On Occasion.
  - *Obligation to Respond:* Required to Obtain or Retain a Benefit.
- We are soliciting public comments to permit the Department to:
- Evaluate whether the proposed information collection is necessary for the proper functions of the Department.
  - Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.
  - Enhance the quality, utility, and clarity of the information to be collected.
  - Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

Please note that comments submitted in response to this Notice are public record. Before including any detailed personal information, you should be aware that your comments as submitted, including your personal information, will be available for public review.

#### Abstract of Proposed Collection

The DS-261 allows the beneficiary of an approved and current immigrant visa petition to provide the Department with his or her preferred email address, which will be used for communications with the beneficiary. The DS-261 also allows the beneficiary to appoint an agent to receive mailings from the National Visa Center (NVC) and assist in the filing of various application forms and/or paying the required fees. The beneficiary is not required to appoint an agent but must provide current contact information. All cases will be held at NVC until the DS-261 is electronically submitted to the Department.

#### Methodology

Applicants will complete the form online and submit it electronically to the Department.

**Kevin E. Bryant,**

*Deputy Director, Office of Directives Management, Department of State.*

[FR Doc. 2021-12422 Filed 6-14-21; 8:45 am]

**BILLING CODE 4710-06-P**

## TENNESSEE VALLEY AUTHORITY

### Environmental Impact Statement for Kingston Fossil Plant Retirement

**AGENCY:** Tennessee Valley Authority.

**ACTION:** Notice of intent.

**SUMMARY:** The Tennessee Valley Authority (TVA) intends to prepare an Environmental Impact Statement (EIS) to assess the impacts associated with the proposed retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF) and the construction and operation of facilities to replace the retired generation. TVA will use the EIS process to elicit and prioritize the values and concerns of stakeholders; formulate, evaluate and compare alternatives; provide opportunities for public review and comment; and ensure that TVA's evaluation of potential retirement and replacement energy generation reflects a full range of stakeholder input. Public comment is invited concerning the scope of the EIS, alternatives being considered, and environmental issues that should be addressed as a part of this EIS. TVA is also requesting data, information and analysis relevant to the proposed action from the public; affected Federal, State, tribal, and local governments, agencies, and offices; the scientific community; industry; or any other interested party.

**DATES:** To ensure consideration, comments on the scope and environmental issues must be postmarked, emailed or submitted online no later than July 15, 2021. To facilitate the scoping process, TVA will hold a public scoping meeting; see <http://www.tva.gov/nepa> for more information on the meeting.

**ADDRESSES:** Written comments should be sent to Chevales Williams, NEPA Compliance Specialist, 1101 Market Street, BRC 2C, Chattanooga, TN 37402. Comments may also be submitted online at: [www.tva.gov/nepa](http://www.tva.gov/nepa), or by email at [nepa@tva.gov](mailto:nepa@tva.gov). Please note that, due to current TVA requirements for many employees to work remotely, TVA recommends the public submit comments electronically to ensure their timely review and consideration.

**FOR FURTHER INFORMATION CONTACT:** Please contact Chevales Williams at the address above, by phone at (423) 751-7316 or email at [cwilliams1@tva.gov](mailto:cwilliams1@tva.gov).

**SUPPLEMENTARY INFORMATION:** This notice is provided in accordance with the regulations promulgated by Council on Environmental Quality at 40 CFR parts 1500 to 1508 (84 FR 43304, July 16, 2020) and TVA's procedures implementing the National

Environmental Policy Act at 18 CFR part 1318. TVA is an agency and instrumentality of the United States, established by an act of Congress in 1933, to foster the social and economic welfare of the people of the Tennessee Valley region and to promote the proper use and conservation of the region's natural resources. One component of this mission is the generation, transmission, and sale of reliable and affordable electric energy.

#### Background

In June 2019, TVA published the 2019 Integrated Resource Plan (IRP), which was developed with input from stakeholder groups and the general public. The 2019 IRP evaluated six scenarios (plausible futures) and five strategies (potential TVA responses to those futures) and identified a range of potential resource additions and retirements throughout the TVA power service area, which encompasses approximately 80,000 square miles covering most of Tennessee and parts of Alabama, Georgia, Kentucky, Mississippi, North Carolina, and Virginia. The target supply mix adopted by the TVA Board through the 2019 IRP included the potential retirement of 2,200 MW of coal-fired generation by 2038. The IRP acknowledged continued operational challenges for the aging coal fleet and included a recommendation to conduct end-of-life evaluations during the term of the IRP to determine whether retirements greater than 2,200 MW would be appropriate. Following the publication of the IRP, TVA began conducting these evaluations to inform long-term planning. TVA's recent evaluation confirms that the aging coal fleet is among the oldest in the nation and is experiencing deterioration of material condition and performance challenges. The performance challenges are projected to increase because of the coal fleet's advancing age and the difficulty of adapting the fleet's generation profile; and, in general, because the coal fleet is contributing to environmental, economic, and reliability risks.

KIF is located in Harriman, Roane County, Tennessee, approximately 35 miles west of downtown Knoxville. The plant is on a large reservation of approximately 1,255 acres situated on a peninsula formed by the confluence of the Clinch and Emory Rivers at the Clinch River. Built between 1954 and 1955, the nine-unit, coal-fired steam-generating plant has a summer net capability of 1,398 megawatts (MW). The intensive cycling of the KIF units, reflected in start-up/shutdown events

averaging greater than 85 times per year, is outside the intended design basis of the plant. Additionally, KIF has been dealing with significant material condition issues over the last five years. Lower boiler drum repairs at KIF are symptomatic of age-driven material condition failures that are difficult to proactively address. Based on this analysis, TVA has developed planning assumptions for KIF retirement. TVA proposes to retire three units as early as 2026, but no later than 2031, and the remaining six units as early as 2027, but no later than 2033, dependent on internal and external factors that could affect bringing replacement generation online.

The Kingston EIS will assess the impact of retiring all KIF units and of replacing the generation of those units, as discussed in the Alternatives section below. To recover the generation capacity lost from retirement of the KIF units and to account for future load growth, TVA is proposing the addition of approximately 1,450 MW of replacement generation. To maintain adequate reserves on the TVA system, this 1,450 MW of replacement generation would need to be in commercial operation prior to the retirement of KIF.

#### Alternatives

TVA anticipates that the scope of the EIS will include various alternatives in addition to the no action alternative (continuing to operate KIF with needed regulatory updates). TVA plans to evaluate three action alternatives in the EIS: (A) Retirement of KIF and construction and operation of a Combined Cycle Combustion Turbine (CC) Gas Plant at the same site; (B) Retirement of KIF, investment in local and regional transmission, and construction and operation of Simple Cycle Combustion Turbine (CT) Gas Plants at alternate locations; (C) Retirement of KIF and construction and operation of Solar and Storage Facilities, primarily at alternate locations. Potential connected actions, such as the natural gas pipeline and transmission upgrades as necessary for any particular alternative, will also be considered in this assessment.

#### Issues To Be Addressed in EIS

The EIS will address the effects of each alternative on the environment, including

- Emissions of greenhouse gases,
- fuel consumption,
- air quality,
- water quality and quantity,
- waste generation and disposal,
- land use,

- ecological,
- cultural resources,
- transportation,
- visual and noise,
- socioeconomic impacts and environmental justice.

The EIS will include discussion and review of any proposed natural gas pipeline(s) that would be a necessary component of a new proposed CC or CT plants under Alternatives A or B. Currently under Alternative A, TVA is considering replacing generation at the KIF location, which would require approximately 125 miles of natural gas pipeline facilities that will, to the extent practicable, be located within or adjacent to an existing pipeline right of way, to bring gas supply to the KIF reservation. The construction of the natural gas pipeline(s) would be subject to Federal Energy Regulatory Commission (FERC) jurisdiction and additional review will be undertaken by FERC in accordance with its own NEPA procedures. TVA's proposed action may also require issuance of an Individual or Nationwide Permit under Section 404 of the Clean Water Act; Section 401 Water Quality Certification; conformance with Executive Orders on Environmental Justice (12898), Wetlands (11990), Floodplain Management (11988), Migratory Birds (13186), and Invasive Species (13112); and compliance with Section 106 of the National Historic Preservation Act, Section 7 of the Endangered Species Act, and other applicable Local, Federal and State regulations.

#### Scoping Process

Scoping, which is integral to the process for implementing NEPA, provides an early and open process to ensure that (1) issues are identified early and properly studied; (2) issues of little significance do not consume substantial time and effort; (3) the draft EIS is thorough and balanced; and (4) delays caused by an inadequate EIS are avoided. TVA invites members of the public as well as Federal, state, and local agencies and federally recognized Indian tribes to comment on the scope of the EIS. Information about this project is available on the TVA web page at [www.tva.gov/nepa](http://www.tva.gov/nepa), including a link to a virtual public meeting room and an online public comment page. Comments on the scope of this EIS should be submitted no later than the date given under the **DATES** section of this notice. Any comments received, including names and addresses, will become part of the administrative record and will be available for public inspection.

After consideration of the comments received during this scoping period, TVA will summarize public and agency comments, identify the issues and alternatives to be addressed in the draft EIS, and identify the schedule for completing the EIS process. Following analysis of the issues, TVA will prepare a draft EIS for public review and comment. Notice of availability of the draft EIS will be published by the U.S. Environmental Protection Agency in the **Federal Register**. TVA will solicit written comments on the draft EIS and also hold a public open house, which may be virtual, for this purpose. TVA expects to release the draft EIS in Summer of 2022. TVA anticipates issuing the final EIS in Spring of 2023 and a record of decision at least 30 days after its release.

**Rebecca Tolene,**

*Vice President, Environment.*

[FR Doc. 2021–12693 Filed 6–14–21; 8:45 am]

**BILLING CODE 8120–08–P**

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## DEPARTMENT OF TRANSPORTATION

### Federal Aviation Administration

#### Noise Exposure Map Notice, Sikorsky Memorial Airport, Stratford, Connecticut

**AGENCY:** Federal Aviation Administration, DOT.

**ACTION:** Notice.

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**SUMMARY:** The Federal Aviation Administration (FAA) announces its determination that the noise exposure maps for Sikorsky Memorial Airport, as submitted by the City of Bridgeport, Connecticut.

**DATES:** *Applicable Date:* The applicable date of the FAA's determination on the noise exposure maps is June 8, 2021.

**FOR FURTHER INFORMATION CONTACT:** Richard Doucette, Federal Aviation Administration, New England Region, Airports Division, 1200 District Avenue, Burlington, Massachusetts 01803. Office: 781–238–7613.

**SUPPLEMENTARY INFORMATION:** This notice announces that the FAA finds that the noise exposure maps submitted for Sikorsky Memorial Airport are in compliance with applicable requirements of Part 150, effective June 8, 2021.

Under Section 103 of Title I of the Aviation Safety and Noise Abatement Act of 1979 (hereinafter referred to as “the Act”), an airport operator may submit to the FAA noise exposure maps that meet applicable regulations and that depict non-compatible land uses as

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## Appendices

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# B

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## Appendix B – Notice of Intent Advertisement

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## **TVA Notice of Intent Advertisement Information for the Kingston Fossil Plant Retirement EIS Scoping**

Cookeville – Cookeville Herald-Citizen  
Published Wednesday, Friday, Saturday/weekend  
Insert: June 16  
Deadline – EOD June 11

Wartburg – Morgan County News  
Published Wednesday  
Insert: June 16  
Deadlines – EOD June 10

Livingston – Overton County News  
Published Tuesday  
Insert: June 15  
Deadline – EOD June 10

Hartsville – Hartsville Vidette  
Published Thursday  
Insert: June 17  
Deadline – EOD June 10

Gainesboro – Jackson County Sentinel  
Published Tuesday  
Insert: June 15  
Deadline – EOD June 10

Jamestown – Fentress Courier  
Published Wednesday  
Insert: June 16  
Deadline – EOD June 10

Including Overton County's Livingston Enterprise, which is a sister paper to the Jackson County Sentinel.

Livingston – Livingston Enterprise  
Published Tuesday  
Insert: June 15  
Deadline – EOD June 10

Kingston – Roane County News  
Published Wednesday, Friday  
Insert: June 16  
Deadlines – EOD June 11

Knoxville – Knoxville News-Sentinel  
Published daily  
Insert: June 16  
Deadlines – EOD June 10

TVA also did additional outreach for during the scoping period by handing out flyers for distribution in the KIF area:

Kinston Community Center  
Kingston City Hall  
Kingston Public Library  
Roane County Heritage Center  
Food City  
USDA  
USPS Breakroom  
Roane Tourism



## Appendices

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# C

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## Appendix C – Public and Agency Scoping Comments

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July 15, 2021

*Via Submission to TVANepaComments.com and Electronic Mail.*

Ms. Chevales Williams  
NEPA Specialist  
Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville TN 37902  
[nepa@tva.com](mailto:nepa@tva.com)  
[cwilliams1@tva.gov](mailto:cwilliams1@tva.gov)

**Re: Scoping Comments for 2021 Environmental Impact Statement on Kingston Fossil Plant Retirement**

Dear Ms. Williams,

On behalf of the Center for Biological Diversity (“Center”), we submit these scoping comments on the Tennessee Valley Authority’s (“TVA”) Notice of Intent to prepare an Environmental Impact Statement (“EIS”) for the retirement of the Kingston Fossil Plant (“Kingston Plant”). We appreciate the opportunity to provide these comments on issues including the need for TVA to include a project alternative for the safe retirement of all Kingston Plant facilities much sooner than the proposed 2033 timeline without complete replacement by another energy source. Under the proposed scoping and its most recent Integrated Resource Plan (“IRP”), TVA assumes a high-growth forecast that would necessitate a complete replacement of Kingston’s lost energy generation. However, given ongoing and already planned energy development, we are concerned that TVA is overcompensating for the agency’s assumed energy demand.

Even more, with priority on new gas development, TVA is not only locking in fossil fuels for decades to come but contributing to even higher emissions through unnecessary additional fossil energy development. Indeed, a recent decision by the South Carolina Public Service Commission rejecting Duke Energy’s proposed IRP is instructive regarding the analysis TVA must undertake here.<sup>1</sup> In that proceeding, South Carolina regulators emphasized the importance and value of evaluating future energy demand rather than assuming consistently high-growth forecasts. In particular, Duke’s proposed IRP forecasted a more than 1% annual growth rate through 2035,<sup>2</sup> and Duke relied on this forecast to justify new generation resources with priority on Combined

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<sup>1</sup> S.C. Public Service Commission, Docket Nos. 2019-224-E & 2019-225-E, Order of June 17, 2021, available at <https://dms.psc.sc.gov/Attachments/Matter/23971ba9-8352-440d-8516-cfc8d5a1ce93>.

<sup>2</sup> Dennis Wamsted, *Key Shortcomings in Duke’s North Carolina IRPs: Part 2*, Institute for Energy Economics and Financial Analysis (Feb. 2021), [http://ieefa.org/wp-content/uploads/2021/02/Key-Shortcomings-in-Duke-North-Carolina-IRPs\\_Part-2\\_February-2021.pdf](http://ieefa.org/wp-content/uploads/2021/02/Key-Shortcomings-in-Duke-North-Carolina-IRPs_Part-2_February-2021.pdf).

Cycle Combustion Turbine (“CC”) and Simple Cycle Combustion Turbine (“CT”) gas plants.<sup>3</sup> However, within the last decade residential demand has instead remained stagnant, calling into question the need to develop new generation resources.<sup>4</sup>

Applying that reasoning here, it is apparent that TVA cannot proceed with its EIS on the assumption that the generation lost from closing the Kingston Plant needs to be replaced. Rather, TVA needs to consider the extent to which – either as a result of affirmative TVA actions, changes in demands and markets, or some combination of both – demand for centralized TVA power may decline in coming years, making replacement of this generation unnecessary, in whole or in part.

We applaud TVA’s decision to retire the Kingston Plant and encourage TVA to rapidly pursue retiring its other remaining coal plants. In doing so, TVA may not assume high-growth forecasts warrant centralized generation project alternatives. Thus, in all these analyses TVA must add a critical action alternative: accounting for declining demand, including offsetting TVA generation with distributed energy resources (“DER”), storage, and energy efficiency improvements.

At present TVA only intends to consider three action alternatives for the Kingston Plant’s retirement, only one of which would replace the coal plant with renewable energy. The other two alternatives prioritize CC and CT gas plants. Both of these energy options fail to address the most pressing issue today: the urgent need for a rapid transition away from all fossil fuels toward a renewable and just energy economy in order to avoid the worst impacts of the climate emergency and address the disproportionate harm experienced by environmental justice communities from the fossil fuel economy. Given the most recent climate change science and the significant climate change harms already occurring in TVA’s territory, TVA must consider alternatives that would have the agency do its requisite part to advance this necessary energy transition.<sup>5</sup>

Furthermore, given the Kingston Plant’s legacy as the site of the country’s largest industrial spill, TVA must also prioritize immediate remediation and adequate clean-up of the Kingston site. Retiring the Kingston Plant cannot be divorced from comprehensive action to address the harms done to communities in the Tennessee Valley – especially the Kingston coal ash workers – and the environment as a result of the 2008 coal ash spill. TVA must therefore also address its plans for expeditious remediation of the site in its upcoming EIS.

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<sup>3</sup> See Final 2020 Duke Energy Progress IRP, <https://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=7f4b3176-95d8-425d-a36b-390e1e57a175>.

<sup>4</sup> Wamsted, *Key Shortcomings in Duke’s North Carolina IRPs: Part 2*.

<sup>5</sup> See Center for Biological Diversity “Scoping Comments for 2021 Environmental Impact Statement on Cumberland Fossil Plant Retirement,” (June 10, 2021), <https://biologicaldiversity.org/programs/energy-justice/pdfs/2021-06-10-Center-Cumberland-Closure-Scoping-Comments-NEPA.pdf>.

Moreover, earlier this year President Biden issued an Executive Order to transform the entire U.S. electricity sector to be carbon-free by 2035.<sup>6</sup> He emphasized the Administration’s policy “to organize and deploy the *full capacity of its agencies* to combat the climate crisis.”<sup>7</sup> As a federal agency and the country’s largest public power provider, TVA must advance carbon-free electricity on a timeline consistent with climate science and the President’s goal. The Kingston Plant EIS must therefore fully and fairly consider alternatives providing for the rapid retirement of the Plant and its replacement, to the extent necessary, with clean, renewable energy sources, including DER, storage and energy efficiency options, in order to comply with the National Environmental Policy Act (“NEPA”), 42 U.S.C. § 4321, *et seq.*

## DISCUSSION

### **A. TVA’s Existing Alternatives For The Kingston Plant Retirement Fail To Achieve The Rapid Greenhouse Gas Reductions That Are Critical To Addressing The Climate Crisis, And The EIS Must Fully Address The GHG Impacts Of All Reasonable Alternatives.**

Given the climate crisis and the important role TVA plays as the nation’s largest power provider, with massive GHG emissions, the Kingston EIS must center the replacement of the Kingston Plant with non-fossil fuel resources, including renewable energy and energy efficiency, to the extent replacement is necessary. At the moment, two of the three project alternatives consider CC and CT gas plants that would potentially contribute to, instead of reducing, TVA’s already alarming GHG emissions through 2038. With increased reliance on gas as a replacement for coal, *TVA would still generate more than 34 million tons of CO<sub>2</sub> each year in 2038.*<sup>8</sup> This current emphasis on further gas expansion is simply unacceptable from the standpoint of what climate science and equity demand.

In addition, while TVA currently intends to consider one alternative prioritizing solar and storage facilities, the EIS must also account for the declining need for centralized TVA generation, including offsetting TVA generation with distributed energy resources (“DER”), storage, and energy efficiency improvements.

#### ***1. TVA must consider renewable energy alternatives aligned with a “path to zero emissions” that would also reduce energy demand.***

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<sup>6</sup> See President Biden Executive Order on Tackling the Climate Crisis at Home and Abroad, Sections 201 and 205(b)(i) (“Biden Order”) (Jan. 27, 2021), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>.

<sup>7</sup> *Id.* (emphasis added).

<sup>8</sup> TVA 2019 Environmental Impact Statement, Final EIS at 5-27.

The purpose of NEPA is to identify reasonable alternatives to an agency's proposed action, and then expose and discuss the multitude of public health, environmental, socio-economic, wildlife, and other impacts of those alternatives. However, regardless of the ultimate decisions made, NEPA does not permit an agency to refuse to even *consider* reasonable alternatives.<sup>9</sup> Accordingly, here TVA may not rely on contract terms or simple economic considerations to refuse to consider alternative scenarios for its power mix in the coming decades, including DER and storage alternatives.

This is particularly true given that TVA acknowledges that its statutory mandate under the TVA Act requires that it be a "leader in technology innovation, low-cost power and environmental stewardship."<sup>10</sup> TVA therefore should be looking for opportunities to invest in the renewable energy technologies that will help reduce electricity prices and make those technologies even more cost-competitive in the coming years.

Recent research demonstrates that replacing fossil fuel resources with DER, storage, and energy efficiency could provide significant financial benefits. One analysis in particular modeled the cost-effectiveness and impact of DERs and other clean energy resources on the electricity system. Under the examined scenarios, significant investment in DER would result in cumulative system-wide savings of \$301 billion by 2050 compared to a business-as-usual energy system.<sup>11</sup> The same study showed that a clean electricity standard reducing emissions by 95 percent from 1990 levels by mid-century could save \$473 billion.<sup>12</sup>

In addition to cost savings, DERs bring several additional benefits including grid management, demand response, and transmission benefits.<sup>13</sup> TVA has expressed concern that alternatives prioritizing renewables like solar as replacements to Kingston are incapable of addressing peak demand. But as the Vibrant Clean Energy report demonstrates, DER can actually *minimize peak demand by about 17 percent* and also effectively shift demand to meet variable supply rather than forcing supply to meet demand.<sup>14</sup>

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<sup>9</sup> See, e.g., *Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv.*, 235 F. Supp. 2d 1143, 1154 (W.D. Wash. 2002) ("An agency may not reject a reasonable alternative because it is not within the jurisdiction of the lead agency").

<sup>10</sup> See Final 2019 TVA IRP at 5-1

<sup>11</sup> Clack et al., *Technical Report: Why Local Solar For All Costs Less- A New Roadmap for the Lowest Cost Grid*, Vibrant Clean Energy (2020), [https://www.vibrantcleanenergy.com/wp-content/uploads/2020/12/WhyDERs\\_TR\\_Final.pdf](https://www.vibrantcleanenergy.com/wp-content/uploads/2020/12/WhyDERs_TR_Final.pdf)

<sup>12</sup> *Id.* at 3.

<sup>13</sup> Armstrong et. al., *Techno-Ecological Synergies of Solar Energy for Global Sustainability*, 2 *Nature Sustainability* 560 (July 2019).

<sup>14</sup> Vibrant Clean Energy Technical Report (2020) at 48 (emphasis added).



Additionally, distributed solar generation can provide benefits to communities and ecosystems including reduced water use, reduced land use, and even improved wildlife habitat, which are critically important to TVA's customers.<sup>15</sup>

Thus, TVA must consider a full range of renewable energy alternatives that would make replacement of TVA's coal power generation with other centralized energy systems, such as CC and CT gas plants, obsolete. TVA must compare the environmental impacts of investments that largely or completely rely on DER, storage and energy efficiency with the other options considered in the proposed EIS—including not only the cost of potential early retirement of fossil fuel resources and expansion of gas, but also the social cost of carbon associated with keeping them running for many years to come.

Instead of investing in risky alternatives based on an assumption of increasing energy demand, TVA should lead the way in investing in climate-friendly and just energy solutions, like distributed solar generation, that would both reduce consumption and TVA's GHG emissions. Renewable energy and energy efficiency alternatives are proven technologies that not only make financial sense, and can lower power bills for TVA customers, but will advance TVA's path to decarbonization.

In short, to meet its purpose of providing safe, clean, reliable, and affordable electricity to all its customers, TVA must add a critical action alternative accounting for declining demand for centralized TVA generation, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.

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<sup>15</sup> Techno-Ecological Synergies of Solar energy for Global Sustainability (2019) at 563.

2. *TVA must meaningfully assess the impacts of greenhouse gas emissions by comparing impacts between the existing alternatives and one or more alternatives that chart a path to zero emissions.*

In other environmental reviews, TVA has refused to meaningfully consider its contributions to GHG emissions on the grounds that they are small relative to global emissions.<sup>16</sup> This approach violates NEPA.

It is well-established that NEPA requires a robust consideration of the impacts of a project's GHG emissions in terms of its relationship to climate change. Thus, although some “speculation is . . . implicit in NEPA,” agencies may not “shirk their responsibilities under NEPA by labeling any and all discussion of future environmental effects as crystal ball inquiry.”<sup>17</sup>

Thus, TVA must add the necessary alternative(s) discussed above that will advance its rapid transition to zero emissions, all the while considering—and informing the public about—the likely environmental outcomes under the different alternatives. In particular, under two of the currently considered alternatives, which propose gas replacements, TVA will continue to be one of the largest contributors to the GHGs that are fueling the climate crisis, and thus will continue to be responsible for the devastating impacts that are certain to come in the country and around the world as we continue to increase the concentrations of GHGs in the atmosphere.

Alternatively, under a renewable energy alternative that maximizes DER, storage, and energy efficiency, and which would reduce demand for centralized and fossil fuel TVA power, TVA would not only carry out its requisite part in phasing out fossil fuels and lowering GHG emissions, but also in addressing environmental justice concerns associated with a reliance on false solutions like fossil gas.

\* \* \*

The urgency of the climate and energy crises demand that large utilities, especially TVA, step up and meet the moment. It is now on power providers to not only rapidly phase out their fossil fuel fleets but to replace that energy with genuinely renewable energy sources and energy efficiency. With the Kingston Plant retirement, TVA has an opportunity to be a model this country needs for what a just and truly renewable energy transition should look like. TVA can and should lay the groundwork for the very technological solutions that other utilities can deploy to meet President Biden's decarbonization goal.

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<sup>16</sup> TVA 2019 Environmental Impact Statement, Final EIS at 5-28.

<sup>17</sup> *N. Plains Res. Council, Inc. v. Surface Transp. Bd.*, 668 F.3d 1067, 1079 (9th Cir. 2011) (citation omitted).

We look forward to commenting on a Draft EIS for the Kingston Plant that fully addresses these concerns. In the meantime, please contact us should there be any further information we can provide.

Sincerely yours,

**CENTER FOR BIOLOGICAL DIVERSITY**

/s/ Gaby Sarri-Tobar

Gaby Sarri-Tobar

Energy Justice Campaigner

1411 K Street NW, Suite 1300

Washington, DC 20005

[gsarritobar@biologicaldiversity.org](mailto:gsarritobar@biologicaldiversity.org)

(202) 594-7271

/s/ Howard Crystal

Howard Crystal

Energy Justice Program Legal Director

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Washington, DC 20005

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(202) 809-6926

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**Your Message**

Decision makers need to know why these decisions matter. Add a personal message about why this issue matters to you.

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O'Kelley	Celia	celiaand@hotmail.com	2055555555
Kennedy	Tom	kennedyt765@gmail.com	
Detter	Kay	HSVgreen@gmail.com	2563376566
DiBiasi	Nick	dibiasin@yahoo.com	2565032851
Swanson	Elizabeth	annswanson320@hotmail.com	2565138069
Williams	David	williams_jc_dr@yahoo.com	2567324834





## Tell TVA to replace the Kingston coal plant with clean energy solutions!

Goal

500

Supporters

59

### Deadline for public comments is July 15

TVA is beginning the process to determine how it will replace the Kingston coal plant. During this scoping process, TVA is designing a study to evaluate the impacts of different energy options, including solar and battery storage technologies. Together we can make sure that TVA not only replaces Kingston with clean energy instead of another gas plant, but we can also **ensure that TVA invests in the future of the community**, and the workers who will be most impacted by this decision. TVA is accepting public comments during this period and we need to make our voices heard.

It's up to us to make sure that this closure is a move towards a transition to clean, sustainable energy that benefits local workers and customers. **This closure will make little sense if it is just replaced by yet another expensive gas power plant.**

**If you support a clean energy future for the Tennessee Valley**, please join us in telling the TVA that renewable energy and better energy efficiency are the solutions. These solutions will prevent air and water pollution, create jobs, and lower bills for TVA customers.

**Tell TVA you appreciate their choice to move beyond coal, and that you want them to continue moving beyond fossil fuels!** *Remember to add a personal message saying why this issue is important to you!*

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### Contact Information

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By submitting your cell phone number you are agreeing to receive periodic text messages from this organization. Message and data rates may apply. Text HELP for more information. Text STOP to stop receiving messages.



# United States Department of the Interior

## NATIONAL PARK SERVICE

Atlanta Federal Center  
1924 Building  
100 Alabama Street, SW  
Atlanta, GA 30303



IN REPLY REFER TO:

1.A.2 (SERO-PC)

Chevales Williams  
NEPA Compliance Specialist  
1101 Market Street, BRC 2C  
Chattanooga, TN 37402

Dear Ms. Williams:

The National Park Service (NPS) has reviewed the Tennessee Valley Authority (TVA) notice of intent (NOI) to prepare an environmental impact statement (EIS) in accordance with the National Environmental Policy Act (NEPA) to assess the impacts associated with the proposed retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF) located in Harriman, Roane County, Tennessee, and the construction and operation of facilities to replace part of the retired KIF generation.

The NOI requests comments concerning the scope of the EIS, alternatives being considered, and environmental issues that should be addressed in the EIS and any data, information, and analysis relevant to the proposed action from federal agencies, including the NPS. In addition to the no action alternative (continuing to operate KIF), TVA plans to consider three action alternatives in the EIS:

- A. Retirement of KIF and construction and operation of a combined cycle combustion turbine (CC) gas plant at the KIF reservation, which would require construction of a roughly 125 mile long natural gas pipeline, that would, to the extent practicable, be located within or adjacent to the existing East Tennessee Natural Gas Pipeline right of way;
- B. Retirement of KIF and construction and operation of simple cycle combustion turbine (CT) gas plants at alternate locations in Gallatin, Johnsonville, Gleason, or Lagoon Creek, Tennessee, and/or Southaven or Kemper, Mississippi; and
- C. Retirement of KIF and construction and operation of solar and storage facilities, primarily at alternate locations to be determined in Northeast Tennessee.

Connected actions, such as the natural gas pipeline associated with the CC plant and transmission upgrades, will also be considered in the EIS. However, it is difficult to understand the full scope of the proposed project areas from the project location descriptions provided in the NOI and other information on TVA's project website. Additional information regarding associated infrastructure development, such as transmission upgrades and roads, was not

included in the NOI or the project website. Finally, the distributed nature of Alternative C, which includes many (20+) solar and storage facilities within Northeast Tennessee at locations to be determined, makes it difficult to understand the potential effects of these facilities.

We request cooperating agency status under NEPA for this proposal because there are areas under NPS jurisdiction or areas of expertise that are within the area of potential affect. Potential impacts to these resources and potential mitigation, as necessary, will need to be addressed in the EIS. Designation as a cooperating agency does not preclude NPS' independent review and comment responsibilities, or preclude our responsibilities for any other environmental consultations required by law. Similarly, our being a cooperating agency would not imply that the NPS would necessarily concur with all aspects of TVA's findings. We offer the following scoping comments for consideration in the EIS:

#### *National Park System/Wild and Scenic Rivers*

Obed Wild and Scenic River (OBED) is a unit of the National Park System and the National Wild and Scenic River System. The NPS does not have authority to grant a right of way permit across OBED lands for the purpose of a natural gas pipeline. The pipeline would need to avoid federal lands within the OBED boundary as a result.

However, Section 7 of the Wild and Scenic Rivers Act could apply to stream crossings outside of the designated reaches of the Obed River, Emory River, Clear Creek, and Daddys Creek at OBED beyond its boundary, and a determination by the NPS under Section 7 may be required for this project. Section 7 requires NPS to evaluate federally-assisted water resource developments "below or above a wild, scenic or recreational river area or on any stream tributary" that have the potential to "invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values."

The potential crossings of the Emory River and Campground Creek by the East Tennessee Natural Gas Pipeline in Alternative A are upstream and near the designated reach of the Emory River. The existing pipeline crossing of Susan Branch is similarly situated upstream and near Milligan Branch and the designated reach of the Obed River, and the same pipeline crosses many tributaries upstream and near the designated reach of Clear Creek, including Gut Branch, Little Clear Creek, Gordon Branch, Green Branch, Douglas Branch, White Creek, Little Creek, Four Mile Creek, and Bice Creek.

Geospatial data for the administrative boundaries of National Park System Units can be located at the following link: <https://irma.nps.gov/DataStore/Reference/Profile/2225713>

More information and geospatial data for Obed Wild and Scenic River can be located at the following link: <https://rivers.gov/rivers/Obed.php>

#### *Land and Water Conservation Fund*

NPS' Land and Water Conservation Fund (LWCF) State and Local Assistance Program provides matching grants to states and local governments for the acquisition and development of public outdoor recreation areas and facilities. In a letter dated June 22, 2021, the Tennessee Department of Environment and Conservation Recreation Resource Division indicated to NPS that "with the

limited local data from the information presented from TVA on all options, it cannot be determined exactly what [LWCF Act] Section 6(f)(3) protected land will be impacted. We do feel that based on the information from TVA, multiple Section 6(f)(3) protected parcels could be impacted by any of the options presented. Additional data on the local level will be needed to determine what, if any, Section 6(f)(3) protected land is impacted.”

Cummins Falls State Park could be affected by the natural gas pipeline that is part of Alternative A and is a LWCF-assisted site. NPS also analyzed potential impacts to LWCF-assisted sites in the counties containing Alternative B potential locations in Tennessee and Mississippi. In Tennessee, there are eighteen LWCF projects in Sumner County (Gallatin), eleven LWCF projects in Weakley County (Gleason), two LWCF projects in Humphreys County (Johnsonville), and one LWCF project in Haywood County (Lagoon Creek). In Mississippi, there are three LWCF projects in Kemper County (Kemper) and none in De Soto County (Southaven).

Impacts to any LWCF-assisted site(s) by any of the project alternatives would likely constitute an LWCF conversion that must be approved by the NPS. “No property acquired or developed with assistance under this section shall, without the approval of the Secretary, be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location.” LWCF Manual, Chapter 8 (36 C.F.R. 59.3)

#### *Nationwide Rivers Inventory*

Clear Creek, Crooked Fork Creek, the Emory River, White Creek, Spring Creek, the Blackburn Fork of the Roaring River, Flynn Creek, and Goose Creek are listed on the Nationwide Rivers Inventory (NRI) administered by the NPS, and they could be crossed by the Tennessee Ridgeline pipeline that is part of Alternative A. NRI river segments are potential candidates for inclusion in the National Wild and Scenic River System. Under the Wild and Scenic Rivers Act section 5(d)(1) and related guidance, all federal agencies must seek to avoid or mitigate actions that would adversely affect one or more NRI segments.

Geospatial data for the NRI can be located at the following link:

<https://irma.nps.gov/DataStore/Reference/Profile/2233706>.

#### *National Historic Trails*

Johnsonville, TN, one of the Alternative B Preliminary CT Sites, is within one mile of the Water Route of the Trails of Tears National Historic Trail (NHT) and within 1.5 miles of the Benge Route of the Trail of Tears NHT. The Reynoldsburg Ferry Site within the community of Johnsonville is a high potential site associated with the Trail of Tears NHT. A high potential site is defined in the National Trails System Act as, “those historic sites related to the route, or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use” (P.L. 90-543, as amended through P.L. 116-9, March 12, 2019).

The geospatial data for the designated alignment of the Trail of Tears National Historic Trail can be located at the following link:

<https://irma.nps.gov/DataStore/Reference/Profile/2238914>.

*National Register of Historic Places*

The Officer Farmstead, Fort Blount-Williamsburg Site, and Averitt-Herod House are all National Register (NR)-listed properties that could be affected by the natural gas pipeline that is part of Alternative A. Many other NR-listed properties exist within the areas potentially affected by the project. TVA should complete the required steps under National Historic Preservation Act (NHPA) Section 106 in its analysis for the project, in particular, the identification of historic properties. We also may find upon further review that it would be appropriate for the NPS to be a consulting party under NHPA.

*National Heritage Areas*

The project is within the Tennessee Civil War National Heritage Area.

We look forward to continued collaboration with TVA on this project. Please let us know if we can supply you with copies of the congressionally-designated alignment of the NHT, or any other information for use in your analysis. Please direct questions to Dusty Pate, Energy Specialist, at 404-772-0637, or [haigler\\_pate@nps.gov](mailto:haigler_pate@nps.gov)

Sincerely,

A handwritten signature in dark ink, appearing to read 'Pedro M. Ramos', with a stylized, overlapping loop at the end.

Pedro M. Ramos  
Acting Regional Director

cc: Niki Nicholas, Superintendent, Obed Wild and Scenic River  
Ms. Katherine Blount, Mississippi Department of Archives & History  
Mr. Patrick McIntyre, Jr., Tennessee Historical Commission  
Dr. Carrol Van West, Center for Historic Preservation, Middle Tennessee State University



## Tennessee Valley Resident Comments on Kingston Scoping

*Submitted via Sierra Club*

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The following document contains 583 signatures, more than half of which are accompanied by additional personal messages. These signatures indicate broad and diverse support for TVA to assist communities impacted by the closure of the Kingston plant while moving aggressively to increase solar energy, battery storage, and energy efficiency -- instead of trading coal for new gas plants and pipelines.

***The following spreadsheet contains names and contact information of people who signed the letter below:***

Thank you for taking comments on this important process that will impact how electricity in the Tennessee Valley is generated.

I support TVA's decision to retire the polluting Kingston coal plant. Moving away from coal is a smart business decision that benefits our air, water, and climate. I also urge TVA to assist the communities that will be impacted by the plant's closure, including providing worker re-training and funding economic development initiatives.

The same economics behind moving away from coal also support moving aggressively toward safe, cheap, abundant solar, increasing battery storage, and helping people lower their bills by making energy efficiency more accessible.

Renewable energy is smarter and safer than fossil fuels, and it's known that it is the cheapest form of new electricity generation across most of the U.S. That's why I oppose any plan that would trade coal for new gas plants and pipelines.

New gas infrastructure would expose the people and businesses in the Tennessee Valley to another polluting fossil fuel that is risky for our health and environment, our climate, and for customers.

Thank you for your consideration of these comments.

Name	Email	Address	City	State	Zip	Personal Message
Emily Freeman	katfree01@gmail.com	1450 Roper School Rd	Hickman	KY	42050	Solar panels in our yard feed into your grid. Your larger grid needs many more solar collectors.
Joe Franklin	jgfranklin2010@gmail.com	401 Orleans St	Johnson City	TN	37601	Dear TVA administration: Please phase out dirty coal power plants such as Kingston and shift to solar and clean renewable energy sources which will provide economic support to the community. Thank you for your consideration.  Joe Franklin
Betsy Sutherland	betsy@xmission.com	PO Box 124	Woodburn	KY	42170	As a person who is soon to have their first grandchild in southeastern Kentucky, I want the future to look bright. By using renewable energy, as opposed to fossil fuels, you would be making not only a good long term business decision, but keeping the area environmentally sound for the next generation. This geographic area also needs workers trained in working with renewable energy, which could be provided by TVA, giving a boost to the economics of an region in need, and again, a good long term business decision. Thank you.
Cherie Martinez	flygirl01@att.net	1098 Constitution Dr	Chattanooga	TN	37405	Tennessee we are 2nd to bottom only to Alabama for clean and renewable energy. Shame on TVA
Sonja Hunter	sgschmidt@hotmail.com	1745 Palmer Rd	Lebanon	TN	37090	It's great that you are closing some coal-fired power plants, but we need to move to clean energy like wind and solar.
Chris Dacus	chriscat2014@hotmail.com	3353 Fairfield Pike	Bell Buckle	TN	37020	As a resident of Tennessee it is very important to me for our state to remain beautiful and breathe-able with clean water. I am a longtime residential Green Power supporter on my electric bill so you know this is important to me.
Drue Zaharis	amodernbergeron@gmail.com	7 Ridgeside Rd	Chattanooga	TN	37411	Clean energy choices that are based on renewable, non-fossil fuels are extremely important to me and the future of my children. We cannot continue to make the wrong choices based on shortsighted monetary expediency. Ford motor company and many others are committed to cleaning up the environment and we cannot support their efforts with backward thinking technology. We must have clean cars using clean energy to tackle one aspect of the Climate Emergency.
Anna Blair	annablairlaw@yahoo.com	1227 Rison Ave NE	Huntsville	AL	35801	I have lived most of my life in TVA land and my dad's dad helped build one of its dams in North Alabama. I expect TVA to do what's right and clean up its act when and where it needs it. This time in Kingston! Thank you.
Geneva Andrews	geneva.andrews@icloud.com	240 Rattan Rd	Dayton	TN	37321	Because I live downriver from the Kingston coal plant I am greatly relieved to hear that you will retire it.
Sarah E Hurd	radiofreeknoxville@gmail.com	145 Olga Ln	Johnson City	TN	37604	Looking to the past for solutions to tomorrow's problems by replacing coal with another fossil fuel doesn't honor the lives lost and destroyed by disasters like the one at Kingston in 2008 - and it only postpones and makes more difficult the inevitable and necessary transition to clean, renewable energy. Invest in the future of our shared home!
Hans-Willi Honegger	hwhonegger842@gmail.com	6522 Rolling Fork Dr	Nashville	TN	37205	Please use modern state of the art technology instead of re-building coal power plants. We can do better.
Barbara Mott	barbara@highlandercenter.org	313 Greenwood Ave	Knoxville	TN	37920	Dear TVA Board of Directors, THANK YOU for moving to retire the Kingston coal plant by 2030! As you well know, these Kingston plant workers and employees can continue their employment through retraining and repurposing their valuable service by investing in clean, sustainable energy. Since the early 1930s, TVA has been a powerful leader in East Tennessee and the Southeast, bringing enormous economic development and technological and educational resources. We need this critical leadership to continue for the future of our region, for the many coming generations of this growing population, and for the future of our planet. We urgently need to develop clean and sustainable energy! Never has your leadership been more critical. Please do not fail us now!
DAVID RIAL	drial1@yahoo.com	1314 S Seminole Dr	Chattanooga	TN	37412	Thank you for moving be you coal and to a cleaner and better future -
Carla Gregg	carlawoodfin@aol.com	21443 Little Tom Rd	Athens	AL	35614	This is a major opportunity for TVA to move forward to clean energy.
Cristina Vazquez	altacy@yahoo.com	50 Compass Park Dr	Weaverville	NC	28786	We must protect nature!!
William Perrine	paulprn0@gmail.com	4310 Crestview Dr	Chattanooga	TN	37415	You have been lagging in development of renewable energy sources for years now, while you should be a leader in solar & wind installations. It's time to pick it up!



Name	Email	Address	City	State	Zip	Personal Message
Betty Anderson	bwabg@bellsouth.net	1043 Nutwood St	Bowling Green	KY	42103	We need to move into the future, and coal is not a part of that picture. Clean, renewable energy is what we need to save the planet.
Nat Harker	nvharker@yahoo.com	1407 Holly St	Nashville	TN	37206	Please, for the love of God and our children, do not continue with fossil fuels. It is so past time to move in to clean, renewable energy!!! Pleeeeaassee.
James Marziotti	jimmarz@fastmail.fm	201 Dark Hollow Rd N	Andersonville	TN	37705	14 years ago I moved to this area for it's natural beauty. I am asking the TVA to help preserve what is here and help to keep it clean by switching to renewable energy sources. Pipelines and fossil fuels are not the answer to our clean energy future. Gas will only serve to intensify our climate change problems. The history of the TVA is to help this area into the future. Clean, renewable energy must be that future.
Suzanne Senn Burke	sennbsc@att.net	1600 Margaret Rachael Cir	Knoxville	TN	37931	As one of the major TN cities, Knoxville should have a nearby power source, particularly given its location near the National Lab at Oakridge. A solar plant could provide this while at the time providing a clean energy source.
Kristi Maisha	kristi.maisha@gmail.com	405 Carters Glen Dr	Nashville	TN	37221	As a Tennessee resident and a researcher in energy efficiency it hurts to know to think about the negative environmental and community impacts that investing in and developing fossil fuel plants can cause. We have the ability and potential to make positive change for our community, state, and country by choosing renewable power. Please, TVA, work with local communities and invest in renewable energy.
Tina Vazquez	altacv@yahoo.com	50 Compass Park Dr	Weaverville	NC	28786	We must protect nature!!
Steve Riches	sparkedcat@gmail.com	541 Laurel Rd	Crossville	TN	38555	Solar is the future.
Joyce Coombs	jcoombs@utk.edu	8236 Wood Rd	Corryton	TN	37721	We need clean energy so we can breathe clean air!!
Donald Keyser	keyserdonald@yahoo.com	1 Hastings Ct	Johnson City	TN	37604	I am one of many with serious COPD, I need clean air and I would appreciate a clean environment
Lisa Kidd	lisakidd1970@hotmail.com	512 Page Dr	Mount Juliet	TN	37122	I was born and raised in this area and the hard working folks there have been abused for generations with pollutants and dangerous jobs. From my Grandfather dying from black lung to my father loosing his foot in the coal mines. The Manhattan project and the coal ash spill. We own a generational family home on Wattsbar lake and even now 13 yrs later I can tell the water isn't clean. For once rather than destroying the beauty of East TN and the health of the people please go clean energy. Thank you
Berta Bergia	n2brains@aol.com	9749 Franklin Hill Blvd	Knoxville	TN	37922	Our beautiful East TN area needs to be preserved, for our children and grandchildren. Please help preserve it by moving from coal and fossil fuel to renewable energy sources, now, before it's too late.
Patricia Post	postpa@gmail.com	6511 Grayson Ct	Nashville	TN	37205	I strongly urge you to replace coal and natural gas as sources of energy for the generation of electricity in the Tennessee Valley with solar energy and increased battery storage technologies. No new coal plants and no new gas plants and pipelines. Our survival depends on it.
Gordon Gibson	ggibson@uuma.org	523 N Bertrand St Unit 201	Knoxville	TN	37917	Installing solar panels in areas affected by the coal ash of the existing plant seems to me to be a sensible, sustainable, and ethical move in the needed direction.
Jeanne LeDoux-Hickman	themoockingbirdfarm@gmail.com	843 Keener Rd	Seymour	TN	37865	East TN is a beautiful area. We need clean energy!! Let's lead our Nation on this. Stop coal and let's build a future we can all rely on!!
Mary Lou Matteson	maryloumatteson@yahoo.com	86 Highland Dr	Crossville	TN	38572	Please at this crucial time in history make a choice for humanity and all of creation. Now is the time for clean, renewable energy.
Charles Baldwin	cbaldwinchem1@gmail.com	7 Saint Andrews Dr	Jackson	TN	38305	I have been a solar system installer for a small company in the 1970's that designed and installed hot water heating systems. We installed more systems for TVA than any other customer. I installed a 3-panel solar array on my residence that paid for itself in savings over a period of 6 years due to the increase in coal prices that TVA was experiencing at that time. I am getting ready to install a ~15 kW PV system on my present residence in Jackson, Tennessee. Please support the citizens of "the Valley" by making clean, safe, economical solar energy the energy source that replaces the toxic, polluting coal plants that TVA is retiring from service. We are ready to partner with you in cost-sharing for a higher quality of life.

Name	Email	Address	City	State	Zip	Personal Message
Nancy Munro	munronb@comcast.net	1351 Tuskegee Dr	Oak Ridge	TN	37830	I live downwind from the Kingston fossil plant in the west end of Oak Ridge,TN. Please replace this plant with clean energy! You could even use a combination of solar and nuclear, especially the small modular nuclear reactors being considered for the old Clinch River Breeder Reactor site.
Pamela Andrews	pandrews@utk.edu	5713 Blossom Rd	Knoxville	TN	37912	Fracked gas is a limited fossil fuel Please replace the coal with a renewable Energy for health and safety of our children and for our one beautiful blue Planet earth. Fracking harms the earth Our water and our air It cannot be our future.
Raymond Murray	n8929u@aol.com	607 Dogwood Dr	Harriman	TN	37748	Move from fossil fuels to renewable energy
Richard Phelps	rickphelps420@gmail.com	1127 Potter Blvd	Tulahoma	TN	37388	Thank you for mothballing the coal-fired Kingston plant. Unfortunately, this plant will live in infamy as the site of the greatest man made environmental disaster EPA has seen. I am very concerned that TVA now plans to replace the Coal-fired boilers to natural gas..another carbon-based fuel . You plan to simply ignore the great advances in renewable energy : solar, wind, hydrogen and others. In contrast, you plan to use NG from heavily polluting hydrofracking wells which release vast quantities of methane and other pollutants into the air and ground water, The composition of the extraction fluids pumped underground are not revealed !  The future is renewable energy. Continuing C-based fuel use will result in great stranded costs as the fracked NG becomes economically replaced by clean renewals . Additionally, TVA must protect the economic well being of their employees by using their skills and labor in these renewable energy resoure development and use at Kingston.
Anne Curtis	annecurtis0290@gmail.com	4 Brookwood Dr	Chattanooga	TN	37411	Clean energy is of utmost importance as we attempt to deal with the climate crisis
Constance Barnes	cbarnes1978@yahoo.com	3387 Highway 39 W	Athens	TN	37303	Put Tennessee at the forefront of clean energy, a major step in restoring it to its original natural beauty.
Scott Sheaffer	white.rider@mail.com	2711 Valley View Dr	Knoxville	TN	37917	you've poisoned the environment for years, now is the time to change
Shirley Murphy	besamurphy@gmail.com	1300 Lakeway Ln	Savannah	TN	38372	Keep Tennessee beautiful and healthy and contribute to green energy development. This will also bring good jobs.
Linda Inness	xotikanml@aol.com	477 Pattie Gap Rd	Philadelphia	TN	37846	I live 12 miles from the site of the coal ash disaster. Many friends were impacted by this. I am in total agreement with moving away from polluting energies and toward renewables. After reading SACE's "Solar in the Southeast" report, I am disappointed in how far TVA falls behind other major utilities in solar adoption. Please make this a priority for your customers and our planet.
Jim Steitz	jimsteitz@icloud.com	849 Glades Rd Apt 1203	Gatlinburg	TN	37738	While the closure of the Kingston plant is correct, it must be replaced with solar and wind energy, because the timetable of our climate crisis will not accommodate the more gradual emissions reductions embodied in your current trajectory, and TVA's trend toward gas-fired generation as replacement of choice. Our current understanding of methane leakage in the natural gas industry also indicates that gas-fired generation carries a greater climate impact, nearer to that of coal-fired power, than previously supposed.
Patricia Glenn	pdglenn@juno.com	1319 Duntreath Cir	Florence	AL	35630	I live in the Tennessee Valley and depend on TVA to supply my power. I also have to depend on TVA to maintain clean water and air.
Robin Peeler	peelerrobin@yahoo.com	4915 Oakview Rd	Knoxville	TN	37918	Thanks for closing the coal plant. Now, please implement clean energy and not fossil fuels.
Mary Lasater	marylasater61@gmail.com	104 Ravenwood Ct	Franklin	TN	37064	I have driven by the coal plant most of my life. It would be great to see it replaced by solar panels and it would help the community.
Monette Rebecca	monetter@comcast.net	320 54th Ave N	Nashville	TN	37209	should and needs to occur before 2030 (asap)

Name	Email	Address	City	State	Zip	Personal Message
David Ownby	downby1@gmail.com	2206 Ridgefield Dr	Johnson City	TN	37601	<p>I am a life-long resident of the Tennessee Valley and the area impacted by both the Kingston and Bull Run coal plants. I strongly encourage TVA to move toward clean, renewable power building on the reputation established with the Windrock wind farm and the forthcoming Advanced Nuclear Solutions micro/modular project. It will foster our state as a leader in energy production and infrastructure.</p> <p>Additionally, I strongly encourage TVA to view cleanup and environmentally sound retirement of these facilities a more important part of its overall plan. If the facilities are completely retired, this must be paired with a necessary project to ensure as cleanup of potentially harmful waste products and preserve the Valley's unique environmental heritage.</p>
Dane Free	df@tennessee.edu	2348 Robinson Rd	Knoxville	TN	37923	Thank-you for your time; your grandchildren will thank-you as well!!
Mary Martin	marymartin@epbf.com	1021 Englewood Ave	Chattanooga	TN	37405	As a TN resident, I am pleased to know this plant is retired! Please support the local economy by creating clean energy jobs!
Kendall Wimberley	krwimberley@gmail.com	1700 Clinch Ave Apt 314	Knoxville	TN	37916	Replacing coal plants with fossil gas plants will only prove to be more costly and polluting for the valley. We need cost effective clean energy with existing technology today!
Daveyenne Mcevers	damcevers@icloud.com	65 Summit St	Burnsville	NC	28714	It is critical for the health of our planet! Renewable energy is the way going forward, get us off fossil fuels!!
Wilbert Griffith	gla4797@embarqmail.com	5908 Highway 421 S	Mountain City	TN	37683	Clean energy is the solution.
Adam Scott	adamscott1996@gmail.com	156 Brockton Dr	Madison	AL	35756	<p>I grew up near a coal plant in Arizona and within the span of 8 years the surrounding horizon went from a clean blue color to a light blue tinged with yellow, green and brown. Yuck!</p> <p>Coal is a dirty, wasteful form of electricity generation and should be phased out with renewables like solar as soon as possible. We don't have any time to delay this transition!</p>
Anna Cole	colam-22@rhodes.edu	899 N Barksdale St	Memphis	TN	38107	As a young person, reducing climate change is very important to me. I will live on this planet for many years to come, and I want myself and the people after me to experience an earth that is not hostile or unlivable.
Doug Kalmer	dougalmer@gmail.com	6655 Pinhook Pike	Collinwood	TN	38450	Retire the Kingston coal plant and choose clean, renewable power, not gas!
Brian Paddock	bpaddock@twlakes.net	218 Mirandy Rd	Cookeville	TN	38506	Solar is cheaper than gas and fuel cost free. No fuel cost charges from end users! Buffalo Mountain still has lots of wind and abandoned strip mine sites for generators. TVA has only about 100 kW installed solar per end user - one light bulb worth. please lead the nation as our public utility.
Cheryl Bennett	cherylwbennett@gmail.com	318 Woodland Rd	Florence	AL	35630	We must stop burning fossil fuels as soon as possible, or global heating will continue.
Gwendolyn Blanton	gwen@madstop.com	218 Hillcrest Rd Ste 102	Kingston Springs	TN	37082	Tennessee should lead the transition-we volunteers always jump up when it's time!
Janet Watt	wattknoxville@aol.com	7113 Bonny Kate Dr	Knoxville	TN	37920	Solutions need to be long term. Methane is as bad as CO2 and is not a good solution.
Ron Shrieves	ronshrieves@gmail.com	3228 Whispering Oaks Dr	Knoxville	TN	37938	TVA should be more proactive, generally, on replacing polluting fuel facilities with solar and wind, and in introducing rooftop solar for business and home owners. The science is clear - it's a matter of making it work, which I know presents some big problems. But the benefits are huge if we can do it.
Shirley Brown	shirleyb109@gmail.com	109 Willard St	Maryville	TN	37803	Long-term economic growth is increasingly dependent on clean energy.
Linda Pearce	lindalpearce@gmail.com	604 Spring House Ct	Brentwood	TN	37027	We must have clean energy to save us. Otherwise the human race is doomed!
Andrew Irvine	andrew_b_irvine@yahoo.com	208 S Ruth St	Maryville	TN	37803	I am raising my kids in the Tennessee Valley. I want to do what I can here to make their future at least a little bit brighter.
Julie Ryan	jryan@alcse.org	6275 University Dr NW Ste	Huntsville	AL	35806	It's time to choose clean energy options! Please consider solar and battery back-up as an option for replacing the Kingston coal plants that should have been retired following the spill in 2008 (or earlier).
Dennis Lynch	dmlynch1@gmail.com	347 N McLean Blvd	Memphis	TN	38112	TVA needs to stop burning fossil fuels, and stop generating CO2 and other pollutants. "Clean, Renewable Energy" must be TVA's way forward. I also ask, why would TVA build a new plant which will be stranded by 2035? Finally, do you believe in Climate Change, the "Climate Crisis"? Would you like to live in any of the growing number of places in the USA which are experiencing more and more days with temperatures over 100 degrees F? I think not!

Name	Email	Address	City	State	Zip	Personal Message
Axel Ringe	onyxfarm@bellsouth.net	1840 Lafayette Rd	New Market	TN	37820	I will repeat what I said for the scoping hearing for Cumberland Fossil Plant: 1. Do an objective study that analyzes the full cost/benefits of generation alternatives for replacing the capacity at Kingston. 2. Ask the local community what they want the post-closure use of the site to be. 3. Study the environmental, social, and health impacts of permanent disposition of the coal ash, including health and safety impacts on workers.
Molly Morales	padbluetbird@yahoo.com	650 College Ave	Paducah	KY	42001	I vote to go Solar Energy if it's possible! We have to change our ways of producing energy as a world and the US is still a leader & respected! Colonizing Mars or whatever planet couldn't be easier than just cleaning this one up and respecting nature!
Kathleen Campbell-Smi	kathleenmassage@gmail.com	2524 McGinnis Dr	Nashville	TN	37216	As we watch the incredible changes in our environment and the negative impact of fossil fuels to all of us and all eco systems; please help to make my granddaughter's life healthier and indeed even possible. Thank you so much.
Chris Milfred	groovelabmastering@gmail.com	7132 Holt Run Dr	Nashville	TN	37211	Solar is a no brainer here.
Sheila Mcinnes	sheilamcinnnes7@gmail.com	508 Creekstone Ct	Dickson	TN	37055	Please. Make the right decision for our future. Solar is the way!
Steve George	egeorge423@yahoo.com	375 E College Ave	Holly Springs	MS	38635	Sola
Nancy O'Dell	nodell22@gmail.com	61 Redmond Rd	Murphy	NC	28906	We must start working towards completely renewal clean energy now! Anything that requires fracking or drilling should be shut down now! If we are going to save this planet for the future generations and possibly slow down the damage that has already been done. No more Gas, Oil, or Coal!!
Jeanette Emmons	jeanette.emmons@bellsouth.net	1129 County Road 681	Saltillo	MS	38866	Please
Linda Utley	lindautility48@gmail.com	628 Rockport Rd	Camden	TN	38320	I worked at TVA for years and I have confidence that you will do the right thing and choose Solar energy.
Beth Denney	granny.denney@gmail.com	1139 Rebecca Dr	Burns	TN	37029	We must take care of the environment. Or we won't have air to breathe or water to drink
Matt Powers	powersm@gmail.com	4405 Curtiswood Cir	Nashville	TN	37204	Save humanity
Jacob Prince	jd325@msstate.edu	928 Lynn Cir	Tupelo	MS	38804	Please choose solar!
Jerry & Debbie Brown	okjerry123@gmail.com	1845 McBride Rd	Lewisburg	TN	37091	Solar
Sam Dornan	sdornan@gmail.com	84 Truman Rd E	Franklin	TN	37064	Climate change is a huge issue that affects us all. We cannot afford to lock ourselves into more fossil fuel infrastructure.
Charlie Morgan	manicdrums@gmail.com	873 Kipling Dr	Nashville	TN	37217	More now than ever, it is imperative to switch to re-usable energy. We're staring irreversible climate change in the face.
Michella Pace	mcpac01@bellsouth.net	9330 Clovercroft Rd	Franklin	TN	37067	Please! Save the planet for your children! Use solar! Do your part! Please
Theodore Dickert	teddickert1109@gmail.com	1109 E Erwin Rd	Erwin	TN	37650	Choose clean energy Thanks
Nancy Caldwell	nancycaldwell1958@outlook.com	405 Brady Point Rd	Signal Mountain	TN	37377	The proof is in the pudding; today it is hotter in the Pacific Northwest than it has ever been in Las Vegas. It is TIME TO DO SOMETHING!!!!
R.T. Williams	titantowntom@icloud.com	1020 Saint Andrews Pl	Nashville	TN	37204	We may not be able to fix all aspects of climate change but it would be immoral not to try. Pick solar please. Thank you
Ashlyn Hall	hallsa1222@gmail.com	2818 Jones Ave	Nashville	TN	37207	I grew up in Anderson county and would really like for the TVA to lead on clean energy as we all make the necessary transition to cleaner fuels.
Susan Hanye	suehanye@gmail.com	427 Sweet Briar Dr	Maryville	TN	37804	Use solar.
Grace Olson	hiregraceolson@gmail.com	895 General George Patton	Nashville	TN	37221	I want my children to be able to have a somewhat clean atmosphere!
Joanne Rhodes	tn1stplace_stephanie@msn.com	7904 Ashbrook Cv	Germantown	TN	38138	Solar and wind are our future. Embrace it.
Kathryn Coil	krcoil@yahoo.com	230 Pepper Ridge Cir	Antioch	TN	37013	Solar power is the future for Tennessee. It will bring better jobs, cleaner energy, and a host of other benefits to our state.
gary earl	gle@comcast.net	1005 Blythe Ct W	Nashville	TN	37221	solar
Linda Utley	lindautility48@gmail.com	628 Rockport Rd	Camden	TN	38320	I worked at TVA for years and I have confidence that you will do the right thing and choose Solar energy.
Diane Lowe	drhea11@hotmail.com	4646 Ball Camp Pike	Knoxville	TN	37921	We need solar energy to counteract global warming. It's time for TVA to get this right.
Cherie Marcom-Gatlin	cheriekatlin@gmail.com	1604 Shumaker Rd	Knoxville	TN	37924	We have to move away from all fossil fuels. We have to try to undo all the damage that has already been done to our environment.
Maggie Longmire	maggielongmire@gmail.com	1502 Cliffside Ln	Knoxville	TN	37914	I want to buy solar energy !!!

Name	Email	Address	City	State	Zip	Personal Message
Lea Alexander	leaalexander@bellsouth.net	2732 Sunrise Blvd	Kodak	TN	37764	Thank you for moving beyond coal. But we're still living with the global climate change consequences not to mention the personal losses. I know someone who is dying from the cleanup of the Kingston coal ash spill. TVA governance needs to do right by these workers instead of shirking responsibility AND redeem itself through choosing solar for the health of the planet and all its people. The majority of us voted in favor of a green future to fight climate change. Show accountability to the people!
Stephen Best	scbest@tds.net	537 McJunkin Rd	Tellico Plains	TN	37385	We must move forward to renewable clean energy, the kigston.plant can be a major star in the hat of TVA paving the way for the need to be sustainable clean energy. Why wait to 2030? Now do it now!
Kathy Mcclung	girlfriend35768@gmail.com	274 Wilson Mountain Rd	Falkville	AL	35622	Thank you for moving in the right direction. Please, consider solar energy. The future of our environment is counting on you.
Susan Hochanadel	shochanadel@hotmail.com	275 Autumn Ln	La Follette	TN	37766	It matters to me that we convert to renewable energy because I have grandchildren who will impacted by the decisions we make !
Elizabeth Hunley	genrop@aol.com	7120 Wellington Dr	Knoxville	TN	37919	I was born and reared in EastTennessee, and It is a privilege to live in this beautiful environment. I want my grandchildren to live and breathe clean air. I am so happy that TVA is no longer gong to burn coal. We now have the opportunity to use clean energy in our Tennessee Valley, and TVA can make an impact on climate change. Elizabeth Carroll Hunley
Jennifer Sheridan Pecor	jenny@pecoraro.org	6949 Sunnywood Dr	Nashville	TN	37211	I've lived in Tennessee for most of my life, and I want my children to know that their futures can be in Tennessee too, if we protect our precious air and water and climate.
Jill Empey	caltnjem@icloud.com	2226 Brighton Farms Blvd	Knoxville	TN	37932	Clean energy jobs are the way to take Tennessee into the future with GREAT success! Think about it? Solar power T!!!
Jared Bendt	jaredbendt@aol.com	728 Frawley Rd Apt 306	Chattanooga	TN	37412	Let's make TN a model for the future! Power from sources that can't destroy lives. Renewable, sustainable, and most importantly, SAFE. Choose solar!
Anne Laura B Reviere	annelaura.reviere@gmail.com	9232 Coxboro Ct	Brentwood	TN	37027	We need solar and sustainable environmental options for energy use. It's time!
Chris Miles	chris.miles7831@gmail.com	2011 Highland Ave Apt 4	Knoxville	TN	37830	Solar panels are so much cheaper now. Don't invest in more another co2 producer with gas.
Debra Kaufman	wellspgs@bellsouth.net	156 County Road 303	Iuka	MS	38852	Thank you TVA for moving away from coal. It will be important for the Kingston coal plant electrical energy capacity output to be replaced with primarily clean energy solutions in order to reduce and minimize CO2 emissions. Large organizations, like TVA, are making plans for changes to address global climate change now.
Garrett Rowcliffe	garretthrowcliffe@gmail.com	1216 Rain Tree Rd	Knoxville	TN	37923	Choose solar
Kelly Johnson	fielddiamond@aol.com	530 Pleasant Hill Rd	Bulls Gap	TN	37711	It is important that at this critical time in the future of our planet we choose sustainable sources of power that will not pollute our environment any further. Now is the time to act and help preserve our wonderful home from a terrible future if we don't preset global warming from increasing further.
Sarah Moss	sarah_rimer@hotmail.com	311 E Scott Ave	Knoxville	TN	37917	My kids and I are counting on you to do the right thing.
Christine Garcia	bonomax@pacbell.net	1017 Stonebrook Dr	Dickson	TN	37055	We must always opt for clean renewable energy going forward. There is too much at stake for us and the planet. Climate change is real and a dangerous threat to everything.
L Neal	meemawof2@comcast.net	4703 Delia Dr	Antioch	TN	37013	Please start using Solar it is better for all of us.
Derek Guy	derekguy13@gmail.com	107 Wendover Cir	Oak Ridge	TN	37830	As a member of IBEW Local 270 in Oak Ridge I have worked at Kingston fossil plant and was working there when the ash spill happened. I have also worked at ORNL building a solar array and would love to see another solar array provide clean power from TVA.
Judy Powell	jbpowell_463@hotmail.com	2942 Folts Cir	Chattanooga	TN	37415	Solar is the answer. Please use it and not gas when the Kingston coal plant is retired.
Noel Marshall	noel@noelmarshall.com	PO Box 543	Blountville	TN	37617	The Next Seven Generations are watching our EVERY decision. CHOOSE SOLAR!
Sharon Vaughn	chviiisnv@gmail.com	1106 Turner Rd	Sale Creek	TN	37373	For the future of our planet, for our children and grandchildren, please choose clean power to replace Kingston Steam Plant, not gas.
Leon Givens	marvingivens56@gmail.com	406 Hospital Rd Apt 16	Winchester	TN	37398	This will have a major impact on the economy and ecology for many generations to come, so I hope and pray that you make the right decision on which way you want to go with this one
Tonya Spann	thollyspann@gmail.com	4018 Silverleaf Rd	Memphis	TN	38115	Clean, renewable power is what we need to ensure a better, healthier future. Tennessee could be a leader in this bright future. Let's get out of the dark ages of fossil fuels for the sake of our children.
Greg Wilson	gregnw1995@yahoo.com	104 Dogwood Ln	Dickson	TN	37055	Choose solar

Name	Email	Address	City	State	Zip	Personal Message
Margaret Brunson	brunsonmg298@yahoo.com	311 N Norris St	Jamestown	TN	38556	Can this change be made without people losing their jobs, providing whatever assistance is needed for retraining??!!
Rosalind McDermott	rozmcdermott@yahoo.com	2602 Bonita Cir SW	Huntsville	AL	35801	We need to move as far as possible from polluting energy technologies. Gas is next door to coal in pollution generation so it is the wrong choice. Go straight to non- polluting solar now.
Debra Lee	debralee116@gmail.com	550 McCrory Creek Rd Apt	Nashville	TN	37214	Clean energy is the way to go. The USA is decades behind other countries especially China.
Sheila Kurtz	skurtz44@yahoo.com	404 Ascot Ct	Knoxville	TN	37923	As a Tennessean, I want our state to remain the beautiful place it has been without the rapidly increasing effects of global warming. Please choose solar power over the Kingston coal plant or gas. East Tennessee needs clean renewable energy!
Steven Phillippy	steve_phillippy@yahoo.com	210 Ace Gap Rd	Townsend	TN	37882	Long term thinking is important.
Libby Gaffney	ewgaffneybaggett@gmail.com	338 Peninsula Rd	Harriman	TN	37748	I live right across the lake from the Kingston Steam Plant and would love to see you switch to clean solar over the future!
Sandra Gray	sunflower8422@gmail.com	500 Minton Hollow Rd	Elizabethton	TN	37643	Please consider using solar energy that is renewable energy not gas. Climate change is here. Let's not make it worse.
Derek Gaumer	derek.gaumer@gmail.com	1055 Franklin Rd	Gallatin	TN	37066	Solar is the best for the planet and people! Please consider retiring the coal plant and choose clean energy!
Joanna Davis	joannad55@icloud.com	2134 Stewart Creek Rd	Murfreesboro	TN	37129	Take a stand for humanity and eliminate coal and fossil fuels. Make the investment in solar technology for all our future.
Peggy Maher	mamaher1@earthlink.net	4152 Heron Hill Dr	Louisville	TN	37777	Seriously fully switch to planet and environmentally sustainable energy sources.
Susan Shann	righteousrebel2@gmail.com	5476 Old Hickory Blvd	Ashland City	TN	37015	Please invest in clean energy NOW for the good of all.
Austin Ray	austinelrodray@gmail.com	4311 Westlawn Dr	Nashville	TN	37212	Please think about my 2 year old little girl Marigold when you make this decision for her.
Shirley Bryant	bcanoe5@bellsouth.net	9946 Humphrey Rd	Cordova	TN	38018	Please choose solar energy. It is what our country needs. Thank you.
Jane Mayer	mayerjane@ymail.com	1865 Enclave Hollow Ln W	Germantown	TN	38139	I've lived in Memphis all of my life! I'm proud of my state and pray that TVA will find a good solution to use renewable energy!!
Christine Mullins	cmsoulson@gmail.com	6800 Pemmbrooke Shire L	Knoxville	TN	37909	Think solar, think smart! ?
Ann Cover	alenoregc@gmail.com	2804 W Linden Ave	Nashville	TN	37212	Please retire this coal plant. We can not hold off the worsening effects of climate change without ceasing the amount of carbon emissions we put into our air. I beg you on behalf of my children and grandchildren!!
Dorothy Pugh	dorothy@balletmemphis.org	1904 Harbert Ave	Memphis	TN	38104	Please go solar!
Julian Saninocencio	juliansaninocencio@gmail.com	724 George Branch Dr	Monterey	TN	38574	Solar energy is a more profitable business model for TVA. Renewable energy technology results in less stranded assets. Please go solar!
Laura Edwards	growwellness@gmail.com	403 Wauford Dr	Nashville	TN	37211	Please be a leader! Use solar.
Russell Kennedy	disnaematter@yahoo.com	5901 Stoneleigh Rd	Knoxville	TN	37912	Our future depends on clean renewable energy. What an amazing turnaround it would be to move away from fossil fuels to clean renewable energy. We could improve the air we breath by cutting out toxic emissions and providing new energy jobs for the local community. Let's embrace the future and make a change for our lives and the lives of generations to come.
Susan Pearce	smpearce.sp@gmail.com	1184 W Crestwood Dr	Memphis	TN	38119	I own 2 electric cars, and it is important to me to be able to charge them at home each night with the cleanest electricity possible.
Mark Smith	mhamil8@comcast.net	3805 Abbott Martin Rd	Nashville	TN	37215	Let's do all we can to slow climate change. We need to use solar or other clean energy sources.
Dona Koehler	sunlithrs@att.net	100 Bintree Ct	Hendersonville	TN	37075	SOLAR! Please!! Choose it today for all the Southern Oregon folks who are experiencing temperatures they've never had to cope with before now.
Christy Mathis	crmathis70@gmail.com	208 Hallford Pl	Hermitage	TN	37076	Solar. Make the plant better. For future generations to survive!!!
Lezlie Oliver	viewovernashville@gmail.com	916 Warren St	Nashville	TN	37208	Clean Energy is essential to the environment! to the future of our young people, generations to come and the health of our planet. We must demonstrat we are the World Leader in planetary health... Clean, Efficient and Sustainable energy that's affordable for everyone.
Nathan Campbell	nvc983@gmail.com	103 Breckenridge Rd	Tulahoma	TN	37388	I'm from Oak Ridge and spent many summers on Watts Bar Lake, and worked for TVA early in my career. Kingston should be converted to a Solar Power Facility!
Maggie Coyle	mattcoyle5@yahoo.com	213 Fall St	Nashville	TN	37206	NOT gas, which is NOT clean energy! Tennesseans deserve clean air and a safe future. Replace the coal plant with SOLAR! Thank you.
Johann Gregory	johanngregory225@gmail.com	2710 Angela Dr	Sevierville	TN	37876	Go Solar, this day and age coal and the coal ash are major pollutants. Do it for the grandkids of your grandkids.

Name	Email	Address	City	State	Zip	Personal Message
Patricia Allen	nikki.allen@comcast.net	1900 Richard Jones Rd Apt	Nashville	TN	37215	SOLAR please!!!!
Bc Walker	bclappwalker@yahoo.com	8317 Tazewell Pike	Corryton	TN	37721	Solar power is a free source of energy and we need to use our brains to figure out how to use this source effectively and safely!and freely to benefit all!
Mary Linn	mll615@bellsouth.net	960 Percy Warner Blvd	Nashville	TN	37205	The change to solar is the only responsible decision to make.
Barbara Walker	bclappwalker@yahoo.com	8317 Tazewell Pike	Corryton	TN	37721	Use solar power
Susan Dodd	doddbiz@charter.net	112 Barberry Rd Apt J42	Johnson City	TN	37604	TVA should be a leader in green power. It's time to reduce CO2 emissions. Thanks
Nakita Blackmon	nakitablackmon43@gmail.com	226 Noble St	Batesville	MS	38606	Curtis Watters
Lyn Govette	lgovette@icloud.com	602 Hoover St	Johnson City	TN	37604	It's way past time to do this. If you care at all about future generations stop using fossil fuels.
Gloria Clark	gloriac Clark938@gmail.com	102 Poplar St	Bolivar	TN	38008	Replace with cleaner environments like solar not gas.
Gregory Waldrop	hggregorywaldrop@gmail.com	159 Heron Pt	Cadiz	KY	42211	TVA was on the leading edge in the 60s and 70s regarding solar energy and o the renewable energy sources when I visited the LBL when it was operated by the TVA. Return to renewable sources and leadership in the development of future serving problem solving!
Randy Geiser	froglevelfolkart@yahoo.com	117 Shepard Way	Burnsville	NC	28714	Please choose solar!! Be a frontrunner!!
Coree Entwistle	coreekaleseed@yahoo.com	581 Woodside Ln	Lafayette	TN	37083	Solar power technology is a rapidly evolving field and it would be so exciting for the TVA to move in that good direction.
Cheryl Pyle	im4rsty@gmail.com	8866 Flame Leaf Cv	Cordova	TN	38018	Solar just makes since, especially in the south! Thanks ?
Noah Carrigan	noahcarrigan@icloud.com	1406 Northshore Woods D	Knoxville	TN	37919	:) Plz use renewable energy!
Betty Lynne Pond	bettylynne@icloud.com	254 Sycamore Dr	Bluff City	TN	37618	I am a coal miner's daughter from Wise County VA. now living in TN. Coal gave me a good life growing up, I am thankful. Now that I know the terrible health and environmental issues produced by coal I am sad and happy to be against the pollution produced by coal fired plants. Please retire any and all unclean coal fired plants.
Patricia Outland	patriciaoutland@bellsouth.net	54 Blink Bonny Dr	Waynesville	NC	28786	This is the right thing to do
Jenna Palk	jennapalk@gmail.com	5043 Timber Trail Dr	Mount Juliet	TN	37122	Please choose solar to replace the coal plant.
Diane Mccluskey	dianemc50@gmail.com	1608 Mitchell Ave	Chattanooga	TN	37408	You can help save our planet with this decision.
Delanna Reed	delanna.reed@gmail.com	703 E Unaka Ave Apt 1	Johnson City	TN	37601	Now is the time to switch to clean renewable energy. Please think to the future and to our descendants so they have a beautiful, unique planet on which to live and play. Thank you, Dr. Delanna Reed
Holly Horsfall	hhorsfal@samford.edu	415 Church St	Nashville	TN	37219	We have to make our planet last for future generations! Our future DEPENDS on how we treat our planet, for ourselves and the other species we share it with!!!
Pat Papachriston	ppapachr@cbyu.edu	389 Holmes Cir	Memphis	TN	38111	I would love to see TVA come into the 21 st century as a leader in Solar energy and storage. We could demonstrate in the East that our solar power with molten salt for storage is the cheapest and cleanest energy available less than 3 cents per kilowatt hour. Many countries including Saudi Arabia, United Arab Emirates, and Spain. Google buys their power from one of these solar plants in California.
Margaret Brooks Taylor	maggiestfrancis7@yahoo.com	1528 Maddox Rd	Centerville	TN	37033	Tennessee has been suffering the effects of climate change. Solar power is an excellent solution in our southern location. This is an opportunity to make great strides in clean energy. Please no gas! Go solar!
Leatrice Burgess	b.leaftrice@gmail.com	900 N Avalon St	Memphis	TN	38107	Choose Solar power for Tennesseans health, Tennessee land, water, and air.
Katie Torrence	katiatorrence12170@gmail.com	2506 Pine Dr NE	Cleveland	TN	37312	I own a lot near the plant and because of the spill the value has gone down considerably. I will soon be 70 years old and was counting on that lot as a nest egg.
Mary Ellen Lothamer	urmelu0616@gmail.com	1721 Linden Ave	Nashville	TN	37212	The survival of humans and life as we know it on this amazing planet depends on our moving away from fossil fuel energy sources. You have the power to move us towards a bright and sustainable future. Thank you for making that a reality!
Max Blake	maxblake3@gmail.com	9025 Anderton Springs Dr	Bartlett	TN	38133	Gas power is a non renewable resource, and once gas is gone, it is gone forever. If we support development of renewable energy resources, like solar, we have a safety net to fall into once our non renewable resources run out, and we won't have to scramble to develop renewable energy all at once.
Cynthia Bernard	meade.bernard@att.net	8100 Bonnafair Dr	Hermitage	TN	37076	Tennessee is rapidly becoming one of the dwindling remaining places in the country not subject to weather extremes - please help keep our beautiful state clean!



Name	Email	Address	City	State	Zip	Personal Message
Prof. dr. donal Huisingh	donaldhuisingh@comcast.net	2232 Delta Way	Knoxville	TN	37919	Dear Colleagues at TVA: Thank you for planning to phase out coal-fired power plants!! Congratulations!! Based upon the rate of climate related increases in frequency and severity of multiple Billion \$ storms & other ominous symptoms, for sure we must speed up our transition to a post-fossil carbon Society as soon as possible! As a climate scientist I urge you to speed up the process of change! Thank you. Prof Donald Huisingh
Lea VanMerkestyn	leavjackson@gmail.com	118 Wilson St	Collierville	TN	38017	Please use Solar!!!  Please also begin training workers who are in the coal industry for work that provides a healthy physical and economical future for both themselves and their children.
Mayme Siders	emyam76@gmail.com	225 Cherokee Trl	Clarksville	TN	37043	The record shattering heat waves tell us we are so so late to this change- but we MUST do what we can, with what we have, in this moment. This vote is what TVA can do PLEASE invest in the future of this planet . Please
Terry Holley	tholleyrow@gmail.com	4301 Holston Hills Rd	Knoxville	TN	37914	Retire the Kingaton coal plant. People don't need to die to clean up spills. It's time to move forward with renewable power, like solar, not gas. Thanks, Terry
Cynthia Stannard	cyn919geo@live.com	1205 Stratton Ave	Nashville	TN	37206	Please choose clean energy options.
Bob Bates	bbates13@lighttube.net	501 Marbury Rd	Tulahoma	TN	37388	A natural gas plant will not get us to zero carbon dioxide emissions. Go with renewables to achieve zero carbon dioxide emissions.
Christopher Morse	christopher_morse@yahoo.com	631 Mountain Dr	Gatlinburg	TN	37738	Make the change.
Edward Garner	mindbridgepress@gmail.com	810 Meridian St	Florence	AL	35630	We're so far behind on fixing the environmental problems we've created, atmospheric pollution and global warming being two of the huge problems we face, retiring coal plants in favor of solar power is an obvious and responsible choice. Please use your authority to close Kingston as you did Colbert.  Sincerely,  Ed Garner
John Todd Waterman	jtoddw@gmail.com	418 Orchard Knob Rd	Clinton	TN	37716	Replacing Kingston's generation with cheap solar, wind, storage, and energy efficiency would be far cheaper than first building a gas plant that would then very soon need to be replaced by cheap solar, wind, storage, and energy efficiency to meet urgent international GHG-reduction goals, for which already-majority public and political domestic support is rapidly building. And the direct cost of new gas wouldn't include the exorbitant prices we would pay for air pollution, methane leakage which supercharges climate-warming feedback loops, and CO2 which would persist for centuries to progressively and irreversibly worsen climate change. Just by 2100, peer-reviewed economic cost-benefit analysis finds that climate change is on track to knock out 30% of annual world GDP, even without factoring in disasters like the loss of our great coastal cities to sea level rise, desperation-driven warfare, and the incalculable humanitarian cost for billions of homeless, starving and thirsting people.
Emily Newton	newtonemilyr@gmail.com	560 Neelys Bend Rd	Madison	TN	37115	Cleaner energy for our future is important!
Melody Piercy	piercy.melody@gmail.com	173 Lasalle Rd	Oak Ridge	TN	37830	As an East Tennessee resident and someone who lives only 20 min from Kingston, I strongly encourage you to chose clean and renewable power as a replacement when retiring the coal plant.  I have lived between two coal plants for most of my life and know the damage coal can do- to our health, wild life and our environment. I know the damage it can do when there's a spill. My family vacations on Watts Bar. I have friends that live on Watts Bar. I myself lived on Watts Bar for a time. The spill wreaked havoc on everyone and everything around it. Lives were lost, the environment destroyed. Please do not replace Kingston's coal plant with something else, like gas, that would once again have the potential to damage the environment again. Please choose the safest, and the cleanest option. Chose us over profit.

Name	Email	Address	City	State	Zip	Personal Message
Tommi Stephenson	tommi.stephenson@comcast.net	1716 River Dr	Nashville	TN	37218	We are killing out planet. Stop making decisions based on fossil fuels as even an option. Go Green and go big!
Brenda Mercier	mercier_brenda@yahoo.com	1614 Little Marrowbone R	Ashland City	TN	37015	Natural resources are limited. Worldometer web site notes that there is 57,270 days left of gas and of course, if it is used more that number will dwindle to nothing,swiftly like currently there is only 57 years of oil left, then no more worldwide. It only makes sense to use solar that will not run out as long as our sun exists.. we have to make the appropriate decisions for our future and with the current invention of these new longer lasting power storage, people can actually create a long term solution, without the pollution. Please make the better choice of solar to replace the coal plant in Kingston, TN. For our children's nd children's children.
Sara Cooper	drsaracooper@gmail.com	1919 Ransom Dr	Murfreesboro	TN	37130	I have lived in East TN all my life until moving to middle TN recently. My home is beautiful and full of very resourceful people who would be supportive of solar power. How proud we would be if we were able to be known for such a forward-thinking move toward clean energy! Please do not replace fossil fuel with fossil fuel. It isn't sustainable and it's short-sighted, passing the buck to my daughter and her future children. Be brave and community minded enough to make the choice for a sustainable future.
Sarah Bolton	eventonemedia@gmail.com	2497 Hale Ave	memphis	TN	38112	It's time to stop dragging our feet and tap into that giant thermonuclear reactor called the Sun. Watching this process get hobbled by politics over the last 30 years has been maddening.
Rhea Jackson	rheajackson02@gmail.com	142 Hurt Rd	Hendersonville	TN	37075	We need to move forward, not backward Renewables are the only way to move forward in a smarter manner
Ginny Ayers	gkayers@charter.net	810 Knights Bridge Rd	Maryville	TN	37803	The right choice could not be more clear: fossil fuel or clean, renewable energy. In other words, choose to be guided by ignorance and callousness, or choose to be sensible, as if you care about the world or anyone in it. It's a no-brainer.
Elizabeth Barger	loveliz77@yahoo.com	130 Huckleberry Rd	Summertown	TN	38483	Our lives depend on the choices we make for energy. Please choose life and sustainable energy of solar and wind instead of the deadly fracted gas then continues the March of climate crisis distruction.
Claire Lovelace	clairejlovelace@hotmail.com	100 Netherland Ln	Kingsport	TN	37660	Please decide 2 go with no fossil fuel. Clean energy is essential to combat the existential threat of climate change.
Diantha Hodges	dianthah@yahoo.com	98 Van Dyck Ct Apt 2	Sparta	TN	38583	Please help our environment by giving us clean energy with solar. TVA has such a large impact compared to what I can do as an individual. Please
Christine Romeo	momromeo59@gmail.com	1700 Villa Pl	Nashville	TN	37212	Please choose clean solar energy. Tennessee has already begun using solar for a portion of Nashville's power.
Helmut Steinberg	holsteinbe@me.com	432 N Highland St	Memphis	TN	38122	renewable energy - looking forward to have my roof solar and fuel my electric car with renewable energy
Robert Gilbert	bobgilb@aol.com	1102 Old Englewood Rd	Athens	TN	37303	solar, water, or wind. Your choice.
Dianne Bowen	dbdolphn@hmail.com	475 N Highland St	Memphis	TN	38122	Please use renewable power in order to reduce global warming and preserve this earth for future generations.
Deborah Narrigan	deborahnarrigan@mac.com	4003 Auburn Ln	Nashville	TN	37215	Hooray! Closing the Kingston coal plant is an excellent decision. The next logical step is replacing it with solar power. Why do anything else?
Lynda Best	ladyart4u@yahoo.com	537 McJunkin Rd	Tellico Plains	TN	37385	Tennessee is a beautiful environment that people specifically visit and choose to live. We must be leaders in renewable, clean energy since we are knwe for our beautiful environment.
Jesse Gore	jessegore@yahoo.com	2411 Chapel Ave	Nashville	TN	37206	Renewable energy is less expensive than fossil and does not kill all life of earth. Please quit poisoning people.
Nicole Deasy	ndeasy@me.com	3742 Ivy Ave	Knoxville	TN	37914	As a country and in this region specifically we have got to start migrating towards renewable energy!!!
Barbara Gay	barbara.b.gay@gmail.com	3910 General Bate Dr	Nashville	TN	37204	Please help us save our environment and planet!
SARAH SPECTOR	sarahrealart@gmail.com	185 Schoolhouse Rd	Summertown	TN	38483	Please build a CLEAN ENERGY power plant! For us, for our children, for our children's children, for the animals and our earth! Thank you!
Mary Kay Christopherse	mycbrswims@gmail.com	605 Redstone Dr Apt 30	Bristol	TN	37620	We can't continue to use finite resources that risks the health of the planet and all inhabitants. Please consider clean renewable energy for this project.

Name	Email	Address	City	State	Zip	Personal Message
Amanda Bissett	amanda_kincaid@hotmail.com	1009 Ault Dr	Chattanooga	TN	37404	Make the RIGHT decision for the future. No coal, no ?natural? gas. So the RIGHT thing for the people and environment of TN.
Donald Keyser	keyserdonald@yahoo.com	1 Hastings Ct	Johnson City	TN	37604	We need a clean, sustainable energy source, not more pollution
Mary Charles Lasater	marylasater61@gmail.com	104 Ravenwood Ct	Franklin	TN	37064	I hope to see TVA invest in more renewable energy with battery back up.
Carol Hoch	hoch_carol@yahoo.com	83 Hot Rock Hollow Rd	Fayetteville	TN	37334	Clean energy is the solution. Lives, including the lives of all living beings whether flora or fauna, are at stake. It is time to take responsibility and man- or woman-up to meet the challenges of global warming. I thank you for the electrical power you have generated for countless lives in the TVA area, but it is time to act in a more planet-friendly manner. The days of coal are done. Move on and take your place of leadership in the renewable energy field. Thank you.
Carol Hoch	hoch_carol@yahoo.com	83 Hot Rock Hollow Rd	Fayetteville	TN	37334	Please be a leader and not a dinosaur of the past.
William Thrasher	billthrasher@bellsouth.net	1214 Forest Xing	Joelton	TN	37080	Go clean, please.
Helen DeBuse	hdebuse@bellsouth.net	105 W Lake Ct	Franklin	TN	37067	Please use clean energy for the future of TVA's Kingston location. Please don not consider fracking fossil fuels as your answer. The US is ready to move to a cleaner environment and brighter future. We can't do it without TVA leading the way!
Charity Siebert	charityn9@gmail.com	8167 Green Belt Dr	Memphis	TN	38125	Let's do this, TVA! Might as well spend the money now and make make a good name for yourself as a leader, because you'll have to convert in the future anyway. Please make it happen now so we can all move forward. Then please come do good stuff in West Tennessee!
Christina Norris	cxnorris24@aol.com	3823 Richland Ave	Nashville	TN	37205	I have lived in TN for 50 years. TVA needs to move toward clean energy to protect the environment.
Teresa Iovino	tmi_darktower@yahoo.com	2206 Cornwall St	Germantown	TN	38138	As a Tennessean, this effects my family specifically, but it also will help everyone as a whole as we move away from dirty energy.
Horst Stollberg	walnutopa77@gmail.com	425 Ethel Beard Rd	Blountville	TN	37617	There is no need to generate electricity using fossil fuels.
Sharon Hart	pisces2129@msn.com	224 Cable Hollow Rd	Butler	TN	37640	It's high time to take Tennessee green. The majority of Tennesseans have had it with coal ash, gas, and other old-fashioned fuels from polluting our beautiful state. We get far more income from tourism than we would have to pay to clean up the mess these fuels cost us.
diane keeney	chickasawplum@outlook.com	1603 Stokes Ln	Nashville	TN	37215	It is well past time to phase out fossil energy sources. Our planet is in crisis and people are dying from water/air pollution, wildfires, shifting heat/rain patterns. Renewable energy NOW.
Nicki Wood	woodnash2@yahoo.com	4035 Sneed Rd	Nashville	TN	37215	Let's use this rebuilding opportunity to move into the future of cleaner energy that is less damaging to the environment and the people around it.
Kara DuLac	kara_dulac@mac.com	1708 Wagon Tongue Ln	Knoxville	TN	37931	It is more than time for us as a nation to consciously switch to renewable energy sources and stop destroying our ecological resources.
Pam Siegler	pamsiegler@gmail.com	135 Cooper Branch Rd	Mulberry	TN	37359	I signed up for green switch. Please stay a leader in using clean energy
Mary Furtney	altanana@epbf.com	4236 Howardsville Rd	Apison	TN	37302	Lets find clean energy its a no brainer!!!!
Michelle Lewis	ellemelle@comcast.net	114 Fern Ridge Rd	Tupelo	MS	38804	Enough already! Can you not see the weather changes on this earth? GO. SOLAR and be heros for saving the earth, our only home.
Donna Hicks	dhicks_1@comcast.net	103 County Road 572	Englewood	TN	37329	After the 2008 coal ash disaster, don't you think this is a no-brainer to replace, not only the Kingston plant, but, start transitioning all other plants, to accommodate clean energy electricity production.
Lisa Schaeffer	6schaeffer4@gmail.com	1475 Petty Rd	White Bluff	TN	37187	Please make the best choice for Tennessee citizens. Learn from our past mistakes and pursue clean energy from solar. We've had enough of the polluting fossil fuels. Money can be made without harming our health and the environment.
Gregory Liebermann	glieber1@comcast.net	1479 Faxon Ave	Memphis	TN	38104	It is your responsibility to protect the planet and the human race!
Grant Mincy	gmincy@gmail.com	6311 Dephine Ln	Knoxville	TN	37920	I love in TN, the ash spill was a huge disaster. Further, we are seeing the dangerous effects if climate change. It's 109 degrees in Portland right now. It's been over 130 degrees in Baghdad several times. What else is there to say? We are in trouble and need clean technologies.
Guerry Mcconnell	aguerryjmj@gmail.com	PO Box 978	Jonesborough	TN	37659	Divesting ourselves of all harmful fuel resources, is a giant step in making a positive difference in our lives and in the world! Please choose solar for your new plant in Kingston; and encourage your clients to invest in solar, as well.

Name	Email	Address	City	State	Zip	Personal Message
Mountaine Jonas	mountaine@gmail.com	174 Woody Ln	Liberty	TN	37095	This is not the time to invest further in fossil fuel technologies.
Chris Dacus	chriscat2014@hotmail.com	3353 Fairfield Pike	Bell Buckle	TN	37020	The climate crisis is already obviously affecting the northwest and western states with deadly heat. So far we in Tennessee are fortunate to not have to undergo that damage. But it will happen unless we take action now to mitigate it. No more coal! No more fracking! No more new drilling. Renewables are our best chance of saving the planet and ourselves.
Susan Johnston	susan.johnston2011@gmail.com	1325 5th Ave N Apt 23	Nashville	TN	37208	Clearly, clean and renewable energy is the way of ... not the future, but the PRESENT! We have no more time to dilly dally. Just look at what is happening out west.
Anne Curtis	annecurtis0290@gmail.com	4 Brookwood Dr	Chattanooga	TN	37411	It's the moral and sustainable thing to do. I don't want to contribute to planet extinction.
Cynthia Willett	cwillit@gmail.com	103 Sanford Ct	Smyrna	TN	37167	Your grandchildren will thank you, maybe not until you're gone, but they will thank you.
Lara Barnes	nimornam@aol.com	3762 Allandale Ln	Memphis	TN	38111	Please go green and spark a change that others will follow. Create new and more stable jobs for our state. You can do the right thing.
Sandra Abel	sandy@abelstructures.com	1014 Ellejoy Crossing Way	Walland	TN	37886	TVA should be a leader in moving to clean energy. Now is the time and opportunity to retire the Kingston coal-fired plant and replace it with clean non-carbon emitting power. Jobs will be created and there will be no future threat of ash contamination to local waters. Go clean green now!
Emily Cohen	emilyrscohen@gmail.com	513 Leonora Dr	Memphis	TN	38117	I have children and they only have a future in a clean energy world.
Stephanie Fox	sfox3599@gmail.com	909 Fairwin Ave	Nashville	TN	37216	It is hard to believe that we even have to ask that you use clean energy rather than fossil fuels. Even if climate change did not exist it would be the right thing to do - who wants more pollution?
Allison Bogisich	ally.bogisich@yahoo.com	1872 Poplar Ave Apt 7	Memphis	TN	38104	Steps to move away from coal plants need to have happened already, it's time to catch up on creating jobs and companies managing renewable energy sources for local communities.
Robert McKeegan	rsmckeegan5@gmail.com	4033 Hiawatha Dr # 6691	Knoxville	TN	37919	We have a great opportunity here to replace this large greenhouse gas emitting source with clean energy. Lead the way like your TVA Acts meant for you to do!
Hunter Oppenheimer	hunteropp@gmail.com	2038 Carr Ave	Memphis	TN	38104	Go for clean energy: solar, wind. No nuclear
David Henderson	dhenderson2@unl.edu	66 S Front St Apt 32	Memphis	TN	38103	In view of the competitive character of clean renewable energy, it seems important to make the shift to clean energy.
Karin Beuerlein	kbeuerlein@bellsouth.net	5535 Meadow Wells Dr	Knoxville	TN	37924	I can't believe, with the western half of the United States baking in record heat and smoldering in flames, that renewable energy is not *the* top priority for every utility in this nation. I am extremely concerned about the intensifying pace of climate change, and my contribution to it every time I use power. Please do the right thing here and move aggressively toward renewables.
Maryanne McFalls	mwmcfalls@aol.com	2266 Durban Point Dr	Soddy Daisy	TN	37379	I have seen no butterflies in my BBB (birds, bees, butterflies) garden this year! Not one! I'm getting pests from the Deep South, like pickle worms, to contend with. Pollution from fossil fuels, and it's resultant global warming, is accelerating at a frightening pace! Please desist burning fossil fuels for energy!
Kent Minault	kminault@gmail.com	311 W Glenwood Ave	Knoxville	TN	37917	I'm deeply concerned about TVA's option to replace Kingston with natural gas. Bring more fossil fuel online is horribly misguided when other options like solar plus storage are available and much less costly.
Christie Walters	skelt1943@gmail.com	6009 Post Rd	Nashville	TN	37205	I don't want any more coal or fossil fuel projects in my state. TVA must conform to green energy.
Rick Merial	rickmerical@yahoo.com	5072 Serenity Dr	Mooresburg	TN	37811	As a participating member I am requesting your efforts and decisions emphasize and prioritize renewable energy choices rather than fossil fuels.
Betty Dudley	equality4peace@yahoo.com	32 White Bridge Pike Apt 4	Nashville	TN	37205	Thanks TVA for moving beyond coal, makes most sense to move away from all outdated fossil fuels. I live here am impacted. Make sure what you plan to do is in the interest first for those of us living here, that in the long haul benefits all.
Tom Smedley	nashvilletrain49@yahoo.com	452 Siena Dr	Nashville	TN	37205	TVA can take the lead in changing to clean and renewable energy sources instead of converting coal plants to natural gas plants. Natural gas is still a fossil fuel!! Fossil fuels are the main cause of Climate Change. Come on TVA, do what you know is Right!!
Betty C Dudley	equality4peace@yahoo.com	32 White Bridge Pike Apt 4	Nashville	TN	37205	DO NOT SUPPORT INEQUALITY WHERE-EVER POSSIBLE. To be able to avoid so near WWII. This time disaster for all. Thank You for all your doing with the Coal thing, here in our beloved state of Tennessee. C plan by far the best for us and all in the long run.

Name	Email	Address	City	State	Zip	Personal Message
Heidemarie Weidner	hzweidner@gmail.com	1622 Edgefield Ct	Cookeville	TN	38506	This matters to me as I live relatively close to the Kingston coal plant. You, TVA, need to meet the needs of workers, the local environment, and the climate, and you must not replace the coal plant with more fossil fuels like methane-leaking, CO2-emitting fracked gas. We want you to know clean energy is the solution. Thanks for moving beyond coal. Now let's move beyond all fossil fuels!
Linda Newkirk	linda@newkirk-al.com	103 Spring Meadow Dr SW	Huntsville	AL	35824	Coal is not environmentally safe.
Horst Stollberg	walnutopa77@gmail.com	425 Ethel Beard Rd	Blountville	TN	37617	Dear TVA to retire the Kingston coal plant is a very good idea. It will help reduce the amount of carbon dioxide that goes into atmosphere. Solar panels do not emit anything. Solar panels convert sunlight into electricity.
Cynthia Biddle	cynthiabiddle@aol.com	3614 Kesterwood Dr	Knoxville	TN	37918	This is Tennessee's chance to lead the charge and change to clean energy for our future and the future of our children and grandchildren! This is the right step forward. Let's back it up with even more right steps. Clean, green and renewable energy! Let's save our great state and the world! Thanks
Robert Stanley	robert-stanley@mocs.utc.edu	1414 Continental Dr Apt 10	Chattanooga	TN	37405	It is my very sincere hope that the Kingston coal power plant will be retired, and that some source of clean energy will be used instead. We must never forget the terrible environmental disaster that occurred in December 2008, when thousands of pounds of coal ash escaped from its holding pit and rushed into surrounding rivers and streams, killing wildlife and upending people's lives. We need a break from the fossil fuels of the past. Please consider something other than and better than more fossil fuels. Thank you for considering my comments.
Wesley Hennessee	wesleyhennessee@gmail.com	1012 Gregory Mills Dr	Smyrna	TN	37167	We need to shift to renewables to help mitigate the damage of climate change. Tennessee can help lead in that shift! Please consider closing the coal plant and invest in cleaner and safer forms of energy
Robert Montgomery	rhmont4@gmail.com	2527 Highway 64	Lewisburg	TN	37091	Please, please, choose a plan best for the planet. TVA has the power to be a leader for a clean future for all your customers?and the earth itself. Please use that power in choosing the source of power at Kingston and beyond.
Sharon Boyce	seboyce24@gmail.com	9520 Westland Dr	Knoxville	TN	37922	I hope that TVA will use this coal plant closure as an opportunity to move beyond coal and gas to a cleaner form of energy and to lead East Tennessee towards a better future. With climate change, we have so little time left to try and make a difference.
Caroline Duley	cvduley@yahoo.com	900 Waldkirch Ave	Nashville	TN	37204	Invest in clean energy for future generations.
Walt George	wggsoil@aol.com	841 Blissfield Ct	Chattanooga	TN	37419	Dear TVA Board members, Please shut down the Kingston coal plant, and focus on decentralized solar. I was dismayed to find out that the purchase price from residential solar production has dropped from \$.13 to \$11, to \$09, and now down to less than \$.02 /watt. You refer to this price as the wholesale price of electricity, but can you really produce electricity at \$.02? Your price reduction is having a detrimental effect on distributed electricity production.... please raise your rates.  Thank you,  Walt George
Luanne Buchanan	luanne.buchanan@gmail.com	309 Garner St	Oxford	MS	38655	We need to make the world a cleaner place for upcoming generations, and let residents have a say about what works where they live.
Ede Pyle	edpyletaxlaw@gmail.com	333 Commerce St	Nashville	TN	37201	More coal should remain in the ground. Please help clean up the past transgressions.
Luca Bombelli	bombelli@olemiss.edu	120 Cedar Hill Dr	Oxford	MS	38655	I am writing this because it is now more important than ever to make sure we switch to renewable energy sources and take the climate into consideration in our choices.
Marita Hardesty	itahm@aol.com	1235 Lonesome Pine Rd	Kingston Springs	TN	37082	I know TVA has been moving away from coal. I hope TVA continues to do all in its power and decision power to provide clean renewable energy to all TVA customers. I hope TVA makes the efforts to do soon in the near future.

Name	Email	Address	City	State	Zip	Personal Message
Rhonda Tinsley	rhonda_tinsley@yahoo.com	711 Hilltop Cir	Spring City	TN	37381	Tennessee generates a lot of income from it's wild natural areas and tourism. These areas help defend our state from some of the effects of climate change that decimate other states routinely. We should protect our natural resources by continuing to reduce carbon pollutants. I for 1 would love to VOLUNTEER to switch to solar if the state made it accessible and affordable.
Martha Wilson	wgm8218@bellsouth.net	8218 White Chapel Ct	Brentwood	TN	37027	I already donate each month to solar and wind and I think that if you made these benefits more widely known you would get more contributors! The only way to save our planet and prevent cancer is to convert to clean energy plus it would create jobs! We cannot sustain a healthy planet unless we leave coal and other CO2 emitting agents far behind.
Cynthia McWilliams	mcwilliamsynthia@gmail.com	1884 Hamlet Dr	Clarksville	TN	37040	Thank you for asking us what we Tennesseans want for our energy sources. We need renewable sources of energy that won't pollute our air, water, or soil. We need sources of energy that won't harm us as they are produced or afterwards. I realize many of our senators and representatives love fossil fuels, but I worry that they do not see the complete picture of how fossil fuels hurt us, wildlife, and the planet. We are in a climate crisis, and every decision you all make will determine if our children will have a healthy environment that contains wildlife and drinkable water, clean air, and uncontaminated soil. Please think of all of us as you decide the future.
Janice Molloy	janice.molloy@ymail.com	1335 Jenkins Rd	Bowling Green	KY	42101	Look to the future TVA! Move entirely away from fossil fuels. Be bold and take the steps toward renewable energy like solar and wind power. I believe that this is everyone's world to protect and to care about.
James Stockwell	jstockwell125@gmail.com	125 Morning Glory Ln	Burnsville	NC	28714	You can do the right thing on this 10 square mile of wasteland you created by allowing the Kingston coal ash spill to occur. Turn it into a solar and wind farm. Thankyou.
Rodney Lynch	rodneylynch@gmail.com	410 Dotson Creek Rd	Washburn	TN	37888	We need to invest in clean energy solutions to protect the beauty of Tennessee, keep our waters clean and improve air quality. Solar, winds, new forms of hydroelectric like wave generated and using river currents with many small generators are just a couple of examples of emerging tech. Solar and Wind are already hard proven in the real world, all over the globe and are the most OBVIOUS choices to replace a dirty & polluting old coal plant.
Tam Salter	saltertam@outlook.com	401 Forest Ave	Chattanooga	TN	37405	I am worried that my grandson and future generations will not be able to live a long healthy life if we continue to disregard the health of the environment.
Jeanie Bell	jeaniebell0104@gmail.com	3708 Decatur Dr	Knoxville	TN	37920	Please think about our children and grandchildren and the future of generations!!!
Clayton Bell	mtndoc4@gmail.com	3708 Decatur Dr	Knoxville	TN	37920	Poor air quality is one of the leading causes of disease. Prevention through sustainable solutions!
Belinda Sellari	belindasellari@bellsouth.net	1604 Key Corner Rd	Brownsville	TN	38012	It is important we protect our home, Earth. Thank you
Lynne Hatler	lynnesframing@yahoo.com	1957 Muddy Branch Rd	Clarksville	TN	37043	Please choose clean and renewable power to replace Kingston's coal fired power plant. The sooner the better!
Velma Bearup	vbearup@gmail.com	4385 University Dr	College Dale	TN	37363	Cleaner air means safer breathing for all living things. Cleaner air protects everyone!
Martha Steele	martha.a.steele@gmail.com	109 Arrow Lands Trl	Meridianville	AL	35759	I have attended a planning meeting, and attendees overwhelming want solar. I was so disappointed to find that in the end pur comments and wishes seemed to be ignored. Please work to add solar and/or wind. The small Huntsville company, American Wind, uses small towers of micro turbines that are easy to maintain.
Anelisse Westmeyer	litachibi123@hotmail.com	103 Pitts Griffin Dr	Madison	AL	35756	I would very much appreciate Alabama businesses to find ways to keep stuff cheap and provide better air to breathe! Please consider the pros of renewables and help Keep Alabama Green! Thank you!
Kristin Wagner	anygnashville@gmail.com	895 General George Patton	Nashville	TN	37221	I grew up in Kingston. Lives were changed for forever from the spill!!! We had to switch to bottled water and we were afraid to bathe. We couldn't swim in the lake or even play in the park. Our childhoods were robbed. Most importantly people died from cancer. It's time to think in a cleaner way. Let's get w the times and bring revenue into the city BC you all were open to being a volunteer and paving the way for our children & grandchildren who will benefit from this change. He?!! make it a university!! A for profit college on how to pace the way!!
Grace OLSON	hiregraceolson@gmail.com	895 General George Patton	Nashville	TN	37221	Please make a healthy change for the better!!

Name	Email	Address	City	State	Zip	Personal Message
Jennifer Sams	weddingflorist76@yahoo.com	405 Cross Rd	Bean Station	TN	37708	Do something good for all of us... And the planet we live on... Please.
Tabatha Fox	tabfox2@gmail.com	710 Saint James Rd	Greeneville	TN	37743	This has to stop!!
Tim Blake	timblakelaw@gmail.com	949 Old Kedron Rd	Spring Hill	TN	37174	The Sun is bright. We should follow the World leaders. Take advantage of future technological advances. The future will be even brighter.
Abbie Hyché	abbie.hyché@gmail.com	608 E Reeder St	Florence	AL	35630	Please move away from fossil fuels. The environment and economics are intrinsically linked. The choice is simple: renewable energy is just that, renewable. Fossil fuels are not. Please join the leaders of the world and invest in renewable energy.
Jon Slaughter	jcslaughter@gmail.com	401 William Wallace Dr	Franklin	TN	37064	It's time to make a change! Help guide Tennessee to a clean energy future.
Margaret Mann	mannmcm9@gmail.com	3921 Ashland City Rd	Clarksville	TN	37043	We live close to Cumberland Plant, own land in Houston County. It is sad that more land has been bought and prepared for ash storage in our hom
Katy Orrick	katyor@aol.com	136 Kentucky Ave	Oak Ridge	TN	37830	Now is the time to move away from dirty fossil fuels. TVA can be a leader in innovation. Work with the scientists and resources in East Tennessee to turn around energy production to safe, clean and renewable sources.
Kathleen Sims	jennyshourek@hotmail.com	164 Park St	Milledgeville	TN	38359	Thanks for making our children's future better thanks for not ? burning coal. Thank you for retiring the Kingston coal plant. Making everyone's life better and more livable
Michelle Harris	michelleharris.lmsw@gmail.com	171 Hendrix Dr	Oak Ridge	TN	37830	I urge you to select renewable energy sources to replace the Kingston coal plant. I do NOT support any new gas plants or pipelines. We really need you to look to the future of the planet and CHOOSE RENEWABLE ENERGY! Thank you so much.
Barbara Migliara	bmigliara@gmail.com	4867 Barfield Rd	Memphis	TN	38117	I care about all the communities in TN. You can do this!
Sandy Watters	sandeehaneline1@yahoo.com	212 24th St	Old Hickory	TN	37138	We as American have learned coal is the dirtiest form of energy. Pls invest in cleaner greener energy! We are only borrowing this planet from our young?
Marcia Gray				TN	37075	A clean energy future that lowers bills and protects the environment sounds like a win win to me!!! Vote for this and you'll be a hero!! Thanks - Marcia Gray
Timothy Nelson	tsnelson7312@aol.com	2014 Middle Tennessee Bl	Murfreesboro	TN	37130	Please consider renewable energy as an important advancement that our nation needs in order to reduce the many harmful effects of fossil fuels. While I am aware that jobs depend on coal, jobs can be created in the renewable energy industry and I do encourage you to invest these in the communities that will be affected to the greatest degree possible.
Holly Krohne	dkrohne@twlakes.net	1031 Meister Hills Rd	Deer Lodge	TN	37726	It is time we used cleaner sources for power. Solar and wind could at least provide some of the power.
Lynn Vanderhoff	lynn.vanderhoff@gmail.com	3532 County Road 255	Fort Payne	AL	35967	Climate change is creating disastrous weather, dangerous health issues and impacting wildlife on a horrendous scale. It is past the time to make the shift to clean energy. Help make that a reality!
Bonita Moore	bonjlad@gmail.com	4923 Masters Dr	Maryville	TN	37801	I moved to TN from FL to be close to my daughter and granddaughters. I want them to have a clean healthy environment for their future.
Brian Hallgren	brianh107@yahoo.com	1114 Patterson Dr	Kingston Springs	TN	37082	We need clean, renewable energy. Shut down the Kingston coal plant.
Nancy Stetten	nstetten@me.com	4306 Nebraska Ave	Nashville	TN	37209	Please do the right thing and bring in clean renewable energy. We have no more time to waste
cas bell	cas.b.1400@outlook.com	4590 Whiteoaks Ln	Bartlett	TN	38002	It matters because when option ms are clearly more sustainable and substantial, you are still attempting to go with the old ways when we have PROVEN SCIENTIFICALLY that it would be a detrimental role in our society of we continued in this direction! carcinogens ! We can do better and are prepared to do so!!!!
Sonja Hunter	biogeek92@yahoo.com	1745 Palmer Rd	Lebanon	TN	37090	We need to move to renewable energy and away from planet-destroying and health-harming energy sources.
Tom Grose	rivynut@gmail.com	1609 Sharpe Ave	Nashville	TN	37206	I am a residential solar owner & in the now defunct GPP program. TVA has a vague and inadequate substitute. I have watched TVA roll back incentives for solar production over the last decade and find there rationale absurd and lacking a vision of decentralized power generation. Please rethink your plans for support of solar generation like other U.S. states who have moved into the current century or else be viewed as a relic of failed power management.
Paul Bienhoff	paul.bienhoff@gmail.com	221 Lochridge Bnd	Kingsport	TN	37663	TVA - it's time for you to stop being part of the climate change problem.
						And, by the way, why not stop trying to kill your customers?

Name	Email	Address	City	State	Zip	Personal Message
Deborah Milewski	dmhollilwood8@gmail.com	3414 Luna Ct	Nashville	TN	37211	Stop polluting and stop killing people stop just stop there cleaner more efficient better ways to get what you need get a grip with reality you're killing our planet greed
Kim Young	kimsings3@yahoo.com	1040 Big Tom Rd	Kingston Springs	TN	37082	As a citizen of Tennessee, I STRONGLY SUPPORT THE CLOSING OF THE KINGSTON COAL PLANT!! It's actually way past time in my humble opinion. What is sorely needed at this time is a HUGE push for clean, renewable energy and to completely move away from fossil fuels, now NOT later. This is what Tennessee, our nation and the world needs to see happen! Thanks very much.
Lordy Smith	ldsmith2@fedex.co.com	3108 Emerald St	Memphis	TN	38115	People need clean air!
Claire Slaughter				TN	37064	Coal is such an outdated form of energy. We know better, we now need to SO better!! Choose clean energy!!
Mary Swafford-Stone	mary.swafford.stone@gmail.com	120 Old Liberty Pike	Franklin	TN	37064	Stop fracking! Use solar and not coal. Thanks, Mary S Stone
Curtis Tomlin	mtomlin@epbfi.com	6626 Gary Ln	Chattanooga	TN	37421	GO GREEN NOW! FOR OUR FUTURE!
Lecil Mcglocklin	isabellemlr722@gmail.com	116 Hillview St Lot 14	Bluff City	TN	37618	Use only renewable Energy
Patrick Conley	pconleyc@gmail.com	7527 Lone Eagle Dr	Murfreesboro	TN	37128	A billion sea creatures just died off the coast of British Columbia due to the massive heat wave. Nature just hit us in the head with a frying pan. Are we smart enough to realize that and do SOMETHING INTELLIGENT FOR SURVIVAL? Try green energy!
Harold Waddle	hscswad@hotmail.com	106 Indian Ln	Oak Ridge	TN	37830	TVA should take the lead in renewable energy & next generation nuclear power because climate change is wrecking havoc on our environment!
Richard Gillaspie	richwilljr@outlook.com	6376 Ivy St	Nashville	TN	37209	We need move to clean energy if we want a future for our descendants.
Jo Tilley Dortch	nat.jo.dortch@gmail.com	4205 Buckner Ln	Paducah	KY	42001	This is imperative for a viable future!
Geri Forkner	geriforkner@gmail.com	566 Randolph Fridley Rd	Sweetwater	TN	37874	Think outside the box and long term. Become the TVA I grew up believing in.
Erica Scott	northdixiechik@yahoo.com	3066 Bayshore Dr	Cookeville	TN	38506	Please change to clean energy for our children!!
Bonnie Swinford	bonnie.swinford@sierraclub.org	2521 Buffat Mill Rd	Knoxville	TN	37917	
April Garland	agarland3536@gmail.com	80 Margerum Rd	Cherokee	AL	35616	
William Resetarits	wresetarits@gmail.com	PO Box 2506	Oxford	MS	38655	
Donna Dupree	donnadupree44@yahoo.com	158B Jb Ivey Ln	Lake Junaluska	NC	28745	
Maureen May	maureenlindamay@gmail.com	1716 Sweetbriar Ave	Nashville	TN	37212	
Michael Costello	bluska@aol.com	8513 Carl Valentine Cir	Knoxville	TN	37931	
Randal Roper	rrenard@aol.com	27729 Laura Ln	Harvest	AL	35749	
Lynn Robinson Ellis	wiseturtle17@gmail.com	1100 W Pine St	Lodi	TN	37918	
Clarice Rankins	clarice.rankins@gmail.com	2837 Buena Vista Pike	Nashville	TN	37218	
Michael Martin	mikemmartin@gmail.com	552 Rainbow Dr	Madison	AL	35758	
Jackie Edmondson	ann.ericson@yahoo.com	800 Swadley Rd	Johnson City	TN	37601	
Greg Loflin	gloflin@ameresco.com	5612 Lake Shore Dr	Knoxville	TN	37920	
Rebecca Silvaggi	iluvk9s@hotmail.com	200 Cedar Pond Dr	Madison	AL	35757	
Linda Carlough	skimmer144@localnet.com	799 Stansberry Rd	Butler	TN	37640	
Monica Brewer	monica.red@gmail.com	888 Lakemont Dr	Nashville	TN	37220	
Shelby Hood	slh2l@hotmail.com	1405 Kinnard Dr	Franklin	TN	37064	
Lucinda Gerlitz	lucinda.gerlitz@gmail.com	160 Big Falls Cir	Manchester	TN	37355	
Kristy Workman	kgworkman@aol.com	3017 Maitland Dr	Greenbrier	TN	37073	
Lorie Buford	loriebuford@charter.net	1725 Heathrow Dr	Cookeville	TN	38506	
Chris Drumright	astrohoops@aol.com	1434 E Main St Apt 26	Murfreesboro	TN	37130	
Jason Nichols	jasonn29tn14@yahoo.com	734 Walker School Rd	Maryville	TN	37803	
Charles Mace	charles.maceiii@gmail.com	2933 Rich Acres Dr	Nashville	TN	37207	
Dianne Doochin	deedoochin@gmail.com	52 Concord Park E	Nashville	TN	37205	
Eddie Owsley	2sweetpedro@gmail.com	828 Snow Farm Rd	Newbern	TN	38059	
Marianne Bentley	m.s.bentley@comcast.net	6522 Rolling Fork Dr	Nashville	TN	37205	
Helen Buckley	helenbuckleylsw@yahoo.com	6574 E Brainerd Rd Apt 81	Chattanooga	TN	37421	
Judy Matheny	hike109@gmail.com	PO Box 55	Lake Junaluska	NC	28745	
Miguel Ossorio	ossorim@aol.com	1113 Southwest Ave	Johnson City	TN	37604	



Name	Email	Address	City	State	Zip	Personal Message
Melonee Oatsvall	poodlegal1119@gmail.com	2541 Blanton School Rd	Woodbury	TN	37190	
Catherine Gonzales	eileengonzales12@gmail.com	435 Horton Rd SE	Cleveland	TN	37323	
James Thoman	jorthoman4047@gmail.com	4047 Mill Rd	Hermitage	TN	37076	
Robert Pittman	rfpittman@aol.com	974 Parkview Pl	Alcoa	TN	37701	
Meleah Bach	mebach@gmail.com	2100 Happy Creek Rd	Seymour	TN	37865	
Sandra Jakimas	sissimarie2017@gmail.com	1773 Highway 116	Caryville	TN	37714	
Christine Pritchard	gardenlily@worldnet.att.net	108 Deer Haven Ct	Harriman	TN	37748	
Peter Evans	pjembl@hotmail.com	26751 449th Ave	Monroe	AL	35630	
Marilyn Lee	mblee1@una.edu	2355 Parc Pl	Florence	AL	35630	
Jena Miller	jmiller2705@gmail.com	2705 Easy St	Sevierville	TN	37862	
Nancy Beavers	highsmith@charter.net	3988 Moore Hollow Rd	Woodlawn	TN	37191	
Sandra Rucker	ruckersandra@bellsouth.net	3249 Masonwood Dr	Nashville	TN	37207	
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**VIA EMAIL TO:**

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**Re: Scoping Comments, TVA's Proposed Environmental  
Impact Statement, Kingston Fossil Plant Retirement**

Dear Ms. Williams:

Southern Environmental Law Center, Appalachian Voices, Energy Alabama, Sierra Club, Southern Alliance for Clean Energy, National Parks Conservation Association, Statewide Organizing for Community eMpowerment (SOCM), and Tennessee Citizens for Wilderness Planning submit these comments on TVA's notice of intent to prepare an EIS to assess the impacts of retiring and replacing the coal-fired units at the Kingston Fossil Plant.<sup>1</sup>

As a federal agency, the largest public utility in the nation, and a major source of greenhouse gas emissions, TVA is well positioned to lead the national response to the climate crisis. President Biden has made achieving “a carbon pollution-free electricity sector no later than 2035” an urgent national priority and has ordered all federal agencies “to *immediately* commence work to confront the climate crisis.”<sup>2</sup> The Kingston Fossil Plant is one of the oldest and dirtiest coal-fired power plants in the country,

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<sup>1</sup> Notice of Intent, Environmental Impact Statement for Kingston Fossil Plant Retirement, 86 Fed. Reg. 31780 (June 15, 2021).

<sup>2</sup> Exec. Order No. 14008, 86 Fed. Reg. 7619, 7624 (Feb. 1, 2021); Exec. Order 13990, 86 Fed. Reg. 7037, 7037 (Jan. 25, 2021) (emphasis added).

responsible for millions of tons of greenhouse gas emissions annually. TVA must retire it.

But TVA must not replace these retired coal units with gas-fired generation and make yet another multi-decade commitment to a carbon-polluting fossil fuel. If it did, TVA—a federal agency—would derail the president’s climate objectives and contribute to the climate-related harm already affecting public health, biodiversity, and economic productivity across the Southeast. Therefore, we urge the utility to use the proposed environmental analysis to:

- Evaluate existing carbon-free distributed and utility-scale technologies, *alone and in combination*, as alternatives to the Kingston Plant. These technologies include demand response, energy efficiency, distributed solar, utility-scale solar, onshore wind, and battery storage; and
- Evaluate the environmental impacts of all alternatives by: (a) quantifying greenhouse gas emissions and assessing climate harm using the Social Cost of Carbon, (b) using appropriate tools to fairly identify environmental justice populations and assessing the disproportionate harm to specific communities, and (c) considering all site-specific impacts.

Congress has instructed TVA to be a “national leader in technological innovation, low-cost power, and environmental stewardship.”<sup>3</sup> TVA must seize this moment.

Thank you for your consideration of our comments. Please contact us if we can answer any questions.

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<sup>3</sup> 16 U.S.C. § 831a(b)(5).

Sincerely,

s/ Amanda Garcia

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## COMMENTS

### I. INTRODUCTION

The climate crisis is causing immediate, devastating harms to public health, biodiversity, and economic productivity.<sup>1</sup> In order to stave off the worst effects of climate change, greenhouse gas emissions must reach zero as quickly as possible. Communities in the Tennessee Valley and the Southeast are especially vulnerable to climate change,<sup>2</sup> and low-wealth individuals and Black, indigenous, and other people of color are disproportionately harmed.<sup>3</sup>

In January, faced with the realities of the climate crisis, President Biden ordered the entire federal government to take decisive, bold action—including swiftly decarbonizing the electricity sector. In Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, President Biden establishes the goals of “net-zero emissions, economy-wide, by no later than 2050” and “a carbon pollution-free electricity sector no later than 2035.”<sup>4</sup> The president emphasized the urgency of the moment: “The United States and the world face a profound climate crisis. We have a narrow moment to pursue action at home and abroad in order to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents.”<sup>5</sup> The Executive Order calls for a “government-wide approach,” as

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<sup>1</sup> U.S. Global Change Research Program, Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II (Reidmiller, D.R. et al. eds), U.S. Global Change Research Program, Washington, DC (2018), <https://nca2018.globalchange.gov/>, at Summary Findings, at 25–32.

<sup>2</sup> *Id.* at 743.

<sup>3</sup> Kristie S. Gutierrez and Catherine E. LePrevost, *Climate Justice in Rural Southeastern United States: A Review of Climate Change Impacts and Effects on Human Health*, Int. J. Environ. Res. Public Health, 13(2): 189 (Feb. 2016).

<sup>4</sup> Exec. Order No. 14008, 86 Fed. Reg. 7619, 7622, 7624 (Feb. 1, 2021); *see also* Exec. Order 13990, 86 Fed. Reg. 7037, 7037 (Jan. 25, 2021) (directing federal agencies “to immediately commence work to confront the climate crisis”).

<sup>5</sup> 86 Fed. Reg. at 7619.

the “Federal Government must drive assessment, disclosure, and mitigation of climate pollution and climate-related risks in every sector of our economy, marshaling the creativity, courage, and capital necessary to make our Nation resilient in the face of this threat.”<sup>6</sup>

The Tennessee Valley Authority is a federal agency, the largest public utility in the nation, and a major source of greenhouse gas emissions. TVA is now considering whether to retire the Kingston Fossil Plant, in Roane County, Tennessee—a sixty-six-year-old coal-fired power plant that, in 2008, was the site of the largest industrial spill in United States history.<sup>7</sup> To meet the goals of Executive Order 14008, TVA *must* close this facility. Doing so will cut dangerous emissions that worsen climate change and pollute the air and water of East Tennessee. These are urgent priorities, and the utility should pursue them apace.

But TVA will fail to take the bold, decisive action required by the president if it replaces the Kingston Plant with new gas-fired generation. New gas plants are not minor additions that TVA can easily walk away from whenever it pleases. They represent major investments—often lasting more than forty years—that will generate avoidable and dangerous greenhouse gas emissions for decades to come.<sup>8</sup> Unchecked, TVA—a federal agency—would derail President Biden’s climate objectives.

TVA’s decision to prepare an environmental analysis for the retirement of the Kingston Plant (the Kingston EIS) comes at a critical moment when substantial reductions in greenhouse gas emissions are both necessary and

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<sup>6</sup> *Id.* at 7622.

<sup>7</sup> Notice of Intent, Environmental Impact Statement for Kingston Fossil Plant Retirement, 86 Fed. Reg. 31780 (June 15, 2021); Austyn Gaffney, *‘They Deserve to Be Heard’: Sick and Dying Coal Ash Cleanup Workers Fight for Their Lives*, The Guardian (Aug. 17, 2020), <https://bit.ly/3xIvoHT>.

<sup>8</sup> *E.g.*, TVA, Paradise and Colbert Combustion Turbine Plants Draft Environmental Assessment 1–2 (Feb. 2021) (describing TVA’s active combustion turbine units, which range from approximately twenty years to more than forty years in age).

feasible. The utility must seize this opportunity to carefully and thoroughly consider the climate crisis in every aspect of the Kingston EIS. Specifically, TVA must:

- Evaluate existing carbon-free distributed and utility-scale technologies, *alone and in combination*, as alternatives to the Kingston Plant. These technologies include demand response, energy efficiency, distributed solar, utility-scale solar, onshore wind, and battery storage.
- Evaluate the environmental impacts of all alternatives by: (a) quantifying greenhouse gas emissions and assessing climate harm using the Social Cost of Carbon, (b) using appropriate tools to fairly identify environmental justice populations and assessing the disproportionate harm to specific communities, and (c) considering all site-specific impacts.

TVA should replace the Kingston Plant with carbon-free alternatives to align with President Biden’s 2035 decarbonization mandate and to do its part to address the climate crisis, achieve environmental justice, and fulfill its statutory mission to be “a national leader in technological innovation, low-cost power, and environmental stewardship.”<sup>9</sup> The proposed Kingston EIS offers TVA an opportunity to show the nation that it has the zeal, foresight, and ability to lead the nation’s energy transition at this critical moment.

## **II. TVA MUST RETIRE THE KINGSTON PLANT, THE SOURCE OF DANGEROUS POLLUTION FOR OVER SIXTY YEARS.**

TVA must retire the Kingston Plant, the source of pollution that has tragically harmed East Tennessee for decades. On December 22, 2008, over a billion gallons of coal ash slurry broke through a six-story dam at the Kingston Plant, covering 300 acres, including homes and waterways, in hazardous waste.<sup>10</sup> Roughly 900 workers spent five years of their lives

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<sup>9</sup> 16 U.S.C. § 831a(b)(5).

<sup>10</sup> Austyn Gaffney, *supra* n. 7.

cleaning up TVA's mess.<sup>11</sup> Today, over fifty of those workers have died and more than 400 are sick because TVA's contractor misled them and failed to protect them from the hazards of toxic and radioactive coal ash.<sup>12</sup> The accident remains the largest industrial spill in United States history, five times larger than BP's Deepwater Horizon oil spill.<sup>13</sup> The Environmental Protection Agency wrote, "The TVA Kingston impoundment failure ignited a nation-wide concern over the safety of coal ash impoundments,"<sup>14</sup> leading the agency to issue the first nation-wide regulations governing the storage and disposal of coal ash.<sup>15</sup>

Over a decade after the catastrophic coal ash spill, the 66-year-old Kingston Plant remains a major source of harmful pollution. Opting for a "monitored natural recovery" of the coal ash spill, TVA left 170,000 cubic yards of contaminated material in the Emory River.<sup>16</sup> To this day, Kingston's on-site coal ash remains subject to a state order, requiring TVA to investigate and remedy any unacceptable risks.<sup>17</sup> The coal ash has contaminated groundwater with levels of pollution—including arsenic, lithium, molybdenum, and cobalt—that exceed groundwater protection standards.<sup>18</sup>

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<sup>11</sup> *Id.*

<sup>12</sup> Jamie Satterfield, *Another Widow Mourns as Death Toll Hits 50 Among Kingston Coal Ash Workers*, Knoxville News Sentinel (Sept. 3, 2020), <https://bit.ly/3xPnyws>.

<sup>13</sup> Gaffney, *supra* n. 7.

<sup>14</sup> EPA, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 80 Fed. Reg. 21301, 21313 (2015).

<sup>15</sup> *Id.*

<sup>16</sup> Austyn Gaffney, *A Legacy of Contamination*, Grist (Dec. 15, 2020), <https://bit.ly/3wJaOpx>.

<sup>17</sup> TDEC Commissioner's Order OGC15-0177 (Aug. 6, 2015).

<sup>18</sup> TVA, Annual Groundwater Monitoring and Corrective Action Report, Kingston Fossil Plant Sluice Trench and Area East of Sluice Trench 6–7 (July 31, 2020), available at <https://bit.ly/3hHyXIT>; TVA, Annual Groundwater

Kingston continuously harms aquatic life in the Emory and Clinch Rivers, where TVA discharges approximately one billion gallons of cooling water every day.<sup>19</sup> During a two-year study, over 400,000 fish were impinged (trapped against steel bars or vertical traveling screens) by Kingston's cooling water intake system, and most died.<sup>20</sup> Smaller species that are entrained (passing through the intake system) swim in water that has been warmed by, on average, 14.4° Fahrenheit before being discharged into the Clinch River.<sup>21</sup> Because temperature is critically important for many species, this heated discharge can wreak havoc on entrained and downstream aquatic life.<sup>22</sup>

With nine coal-fired boilers, the 1700 MW facility is a significant source of air pollution, including sulfur dioxide, nitrogen oxides, particulate matter of various sizes, and numerous hazardous air pollutants.<sup>23</sup> Kingston is the fourth largest source of air pollution in the Great Smoky Mountains National Park, where its emissions impair visibility.<sup>24</sup> A major source of greenhouse gas emissions since 1955, the Kingston Plant has worsened the climate crisis.

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Monitoring and Corrective Action Report, Kingston Fossil Plant Stilling Pond 6–7 (July 31, 2020), available at <https://bit.ly/3iib6hU>.

<sup>19</sup> TVA, Kingston Fossil Plant NPDES Permit No. TN0005452 R-3 (2018).

<sup>20</sup> TVA, Kingston Fossil Plant NPDES Permit No. TN0005452 316(b) Monitoring Program: Fish Impingement at Kingston Fossil Plant During 2004 through 2006 8 (2007).

<sup>21</sup> TVA, Kingston Steam Plant Water Temperature Surveys 1 (Nov. 1974).

<sup>22</sup> Federal Water Pollution Control Admin., *Temperature and Aquatic Life* iv (1967); TDEC, *2014 305(b) Report: The Status of Water Quality in Tennessee* 56 (Dec. 2014), <https://bit.ly/3B7pCll>.

<sup>23</sup> TVA, Kingston Fossil Plant—Application for Renewal of Title V Operating Permit No. 560775, 1-1, 2-6, 2-20 (October 2016) (“Application”).

<sup>24</sup> See National Parks & Conservation Association, Sources of Visibility Impairing Pollution, <https://bit.ly/36Fkua8> (last visited July 15, 2021).

In 2018, Kingston emitted almost four million tons of CO<sub>2</sub>, over seven percent of TVA's total CO<sub>2</sub> emissions and four percent of Tennessee's.<sup>25</sup>

It is time for TVA to put an end to pollution from the Kingston Plant, but it must ensure that it does not replace one dirty fossil fuel with another.

### **III. TVA MUST EVALUATE A FULL RANGE OF CARBON-FREE ALTERNATIVES TO THE KINGSTON PLANT.**

#### **A. NEPA and a presidential mandate require TVA to evaluate carbon-free alternatives.**

To comply with the National Environmental Policy Act and President Biden's Executive Orders concerning the climate crisis, the Kingston EIS must evaluate a full range of carbon-free alternatives. TVA's proposed set of three alternatives—two that would require new gas plants and only one based on carbon-free energy<sup>26</sup>—is far too restricted to satisfy the agency's legal requirements and meet the urgency of the climate crisis head-on.

The evaluation of all reasonable alternatives is a bedrock requirement of NEPA. The statute requires that every EIS include a "detailed statement" on "alternatives to the proposed action."<sup>27</sup> The Council on Environmental Quality's NEPA implementing regulations explain further that agencies must "[e]valuate reasonable alternatives to the proposed action" and [d]iscuss each alternative considered in detail."<sup>28</sup> Moreover, federal agencies must "study, develop, and describe appropriate alternatives" for "any proposal which involves unresolved conflicts concerning alternative uses of available

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<sup>25</sup> See TVA, Kingston Fossil Plant Emissions, <https://bit.ly/3koYQif>; TVA, Carbon Dioxide, <https://bit.ly/3knCDRR>; Table 1, State Energy-Related Carbon Dioxide Emissions by Year, Unadjusted, Energy Info. Admin., available at <https://www.eia.gov/environment/emissions/state/> (Tennessee's total energy-related CO<sub>2</sub> output for 2018 was 94.7 million metric tons).

<sup>26</sup> Notice of Intent, 86 Fed. Reg. at 31781.

<sup>27</sup> 42 U.S.C. § 4332(C).

<sup>28</sup> 40 C.F.R. § 1502.14(a), (b) (2021).

resources.”<sup>29</sup> Few environmental conflicts are more immediate than the conflict between new gas-fired power plants and the urgent need to end all greenhouse gas emissions to combat the climate crisis.

President Biden’s Executive Orders make clear that carbon-free alternatives are both “reasonable” and “appropriate” for the Kingston EIS. Executive Order 13990 directs all executive departments and agencies “to *immediately* commence work to confront the climate crisis,”<sup>30</sup> and Executive Order 14008 makes achieving “a carbon pollution-free electricity sector no later than 2035” a national priority.<sup>31</sup> The president has deployed TVA and all other federal agencies as part of a “Government-wide approach that reduces climate pollution in every sector of the economy . . . and spurs well-paying union jobs and economic growth, *especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure.*”<sup>32</sup> In short, TVA must do its part to achieve dramatic reductions in greenhouse gas emissions.

A robust analysis of carbon-free alternatives is also consistent with TVA’s 2019 Integrated Resource Plan (IRP). The 2019 IRP emphasizes that the utility must have flexibility: it does not select a preferred scenario for energy development, instead opting to recognize that “a variety of future scenarios are possible and each strategy has positive aspects.”<sup>33</sup> TVA selected *all* of the 2019 IRP results for its final recommendation “to provide flexibility for how the future evolves.”<sup>34</sup> In other words, the 2019 IRP deferred until

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<sup>29</sup> 42 U.S.C. § 4332(E); *Trinity Episcopal School Corp. v. Romney*, 523 F.2d 88, 93 (2d Cir. 1975) (“[W]here (as here) the objective of a major federal project can be achieved in one of two or more ways that will have differing impacts on the environment, the responsible agent is required to study, develop and describe each alternative for appropriate consideration.”).

<sup>30</sup> 86 Fed. Reg. at 7037 (emphasis added).

<sup>31</sup> 86 Fed. Reg. at 7624.

<sup>32</sup> *Id.* at 7622 (emphasis added).

<sup>33</sup> TVA, 2019 Integrated Resource Plan at ES-1(2019) (the “2019 IRP”).

<sup>34</sup> *Id.*



later analysis at the individual project stage to gauge the pace, scope, and cost of changes to the energy landscape of the Tennessee Valley and to determine the best manner and resources to address them. In the absence of a comprehensive evaluation to optimize the retirement and replacement of all coal plants at once, like through an updated IRP, the Kingston EIS is the right venue for TVA to undertake the analysis of carbon-free alternatives.

Finally, TVA is myopic in its belief that gas is a “bridging” fuel needed to bring carbon-free energy online. In a recent proceeding, TVA’s sister utility, Alabama Power, sought approval for 400 MW of solar generation paired with batteries (solar/storage projects) specifically to increase reliability and flexibility in the utility’s system. The company told the Commission that the utility chose battery storage because it “will serve a specific reliability function in the Company’s generating fleet,” would help during peak periods, and would be as effective as other projects in extreme weather events.<sup>35</sup> Furthermore, the proposed solar/storage systems were cost-effective: Alabama Power described them as “economically attractive” compared to other existing resources and as “the most cost-effective options in [the Company’s] evaluation” that would “provide excellent value for customers.”<sup>36</sup>

Alabama Power’s expectations for the function and cost of solar/storage projects are consistent with those of other power providers in the region. In its September 2020 Investor Presentation, NextEra Energy reported an

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<sup>35</sup> Rebuttal Testimony of M. Brandon Looney on behalf of Alabama Power Co. at 7:3-5, *Ala. Power Co. Petition for a Certificate of Convenience and Necessity*, Docket No. 32953 (Ala. P.S.C. Jan. 27, 2020); Hr’g Tr. at 832:16–833:2, *Ala. Power Co. Petition for a Certificate of Convenience and Necessity*, Docket No. 32953 (Ala. P.S.C. Mar. 10, 2020).

<sup>36</sup> Direct Testimony of John B. Kelley on behalf of Alabama Power Co. at 19:5-7, *Ala. Power Co. Petition for a Certificate of Convenience and Necessity*, Docket No. 32953 (Ala. P.S.C. Sept. 6, 2020); Rebuttal Testimony of M. Brandon Looney on behalf of Ala. Power Co. at 4:3-5, 7:3-4, *Ala. Power Co. Petition for a Certificate of Convenience and Necessity*, Docket No. 32953 (Ala. P.S.C. Jan. 27, 2020).

expectation that solar/storage facilities would be cost-competitive with new gas post-2023/2024 without subsidies.<sup>37</sup> According to analysts at the Institute for Energy Economics and Financial Analysis, solar/storage projects are cost-competitive with gas now and the costs “are almost certain to decline in the years ahead.”<sup>38</sup> NextEra itself reported to investors that “[c]ontinued declines in battery costs are expected to result” in low costs for solar/storage “even after tax credits phase down.”<sup>39</sup> The company will invest more than \$1 billion in battery storage projects in 2021.<sup>40</sup> As other utilities have recognized, there is no need to wait to bring renewables online: economically and technologically, carbon-free sources like solar/storage are ready now.

**B. TVA must evaluate an alternative which retires, but does not replace, the Kingston Fossil Plant.**

One factor identified in the 2019 IRP—changes in the “demand for electricity”<sup>41</sup>—raises significant questions about the need to replace the generating capacity of the Kingston Plant. In its Notice, TVA assumes that it will need to replace 1450 MW of generating capacity for the first Kingston coal units.<sup>42</sup> But it is far from clear that TVA must replace this retiring capacity *at all*, let alone with another 1450 MW of combined-cycle or combustion-turbine gas generation that will pollute for decades into the future. Indeed, during the recent extreme weather event in February 2021, TVA touted the fact that it was not only able to meet its own three-year high

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<sup>37</sup> NextEra Energy, Inc., September 2020 Investor Presentation 10 (Sept. 2020), <https://bit.ly/2TcEUnH>; Dennis Wamstead, Seth Feaster & David Schlissel, Institute for Energy Economics and Financial Analysis, U.S. Power Sector Outlook 2021 (Mar. 2021), <https://bit.ly/3xDIdDo>.

<sup>38</sup> IEEFA, U.S. Power Sector Outlook, *supra* n. 37, at 10-12.

<sup>39</sup> NextEra Energy, Inc., September 2020 Investor Presentation, *supra* n. 37, at 27.

<sup>40</sup> *Id.* at 28.

<sup>41</sup> *Id.* at ES-4.

<sup>42</sup> Notice of Intent, 86 Fed. Reg. at 31781.

of demand, but was also able to send excess electricity outside of the region to assist neighboring utilities who were suffering grid outages.<sup>43</sup> TVA also maintains a large reserve margin, one that is substantially larger than that recommended by the North American Electric Reliability Corporation to maintain reliability,<sup>44</sup> and expects demand “to be flat, or even declining slightly, over the next 10 years.”<sup>45</sup>

In addition, demand for TVA power may decline further because several customers may terminate their power supply contracts with the utility. These customers include four local utilities that filed a petition with the Federal Energy Regulatory Commission for unbundled access to TVA’s transmission grid.<sup>46</sup> These four utilities represent roughly three to four percent of TVA’s overall load. TVA’s largest customer, Memphis Light, Gas & Water, representing another 10 percent of TVA’s load, is actively considering other power supply options.<sup>47</sup> TVA is of course well aware that it may serve

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<sup>43</sup> Dave Flessner, *Winter Weather Pushes TVA Power Demand to 3-year High for Winter Peak*, Chattanooga Times Free Press (Feb. 17, 2021), <https://bit.ly/3bzZN2x>; Dave Flessner, *TVA Is More Prepared for Winter Weather than Texas Utilities*, Chattanooga Times Free Press (Feb. 26, 2021), <https://bit.ly/3esgvTv>; Samuel Hardiman, Daniella Medina & Brittany Crocker, *Why the Power in Tennessee Stayed on While Texas, Arkansas Had Rolling Blackouts*, Tennessean (Feb. 17, 2021), <https://bit.ly/3l5Rqiv> (“TVA expected to hit peak demand for the week on Tuesday morning with an estimated 28,500 megawatts, but that morning it reached only about 28,141 megawatts, the company said. TVA had 36,000 megawatts of capacity in anticipation of the spike.”).

<sup>44</sup> N. Am. Electric Reliability Corp., *2020 Long-Term Reliability Assessment* 117 (Dec. 2020), <https://bit.ly/3qFPBdh>.

<sup>45</sup> 2019 IRP 1-4.

<sup>46</sup> Compl. and Pet. for Order Under Federal Power Act Sections 210 and 211A Against TVA., *Athens Util. Bd. v. TVA*, Nos. EL21-40-000 & TX21-1-000 (FERC Jan. 21, 2021).

<sup>47</sup> Samuel Hardiman, *With Council Vote, Memphis Decides to Get Bids on Its Electricity Supply, a Key Step to Leaving TVA*, Memphis Commercial Appeal (April 6, 2021), <https://bit.ly/3w8pTl4>.

fewer distribution utility customers in the future and accordingly may have significantly lower demand. Indeed, TVA has been so concerned about the defection of its distribution utility customers and the corresponding load loss that, in 2019, it made a significant change in its power supply contracts in an attempt to permanently lock in as much of its load as possible.<sup>48</sup>

Yet another development potentially affecting demand that TVA must evaluate is the proposed Southeast Energy Exchange Market (SEEM), currently under consideration at the Federal Energy Regulatory Commission.<sup>49</sup> The SEEM was not part of TVA's 2019 IRP. The Kingston EIS must analyze whether SEEM could provide an alternative to building new generation to replace Kingston Plant retirements.

These developments, and their implication that TVA has and may continue to have excess generating capacity, are specifically the types of changes in the energy landscape that TVA pledged to evaluate in its 2019 IRP.<sup>50</sup> They raise serious questions about whether there is even a need to replace 1450 MW of coal generation at the Kingston Plant. TVA must address an alternative that retires, but does not replace, the Kingston Plant in the Kingston EIS.

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<sup>48</sup> Several of the signatories to these comments have filed litigation against TVA for adopting illegal perpetual contracts in violation of the TVA Act and NEPA. Compl., *Protect Our Aquifer v. Tenn. Valley Auth.*, No. 2:20-cv-02615 (W.D. Tenn. Aug. 17, 2020).

<sup>49</sup> Revisions to Joint Open Access Transmission Tariff to Implement Non-Firm Energy Exchange Transmission Service, *Duke Energy Carolinas, LLC and Duke Energy Progress, LLC*, FERC Docket No. ER21-1115-000, (Feb. 12, 2021).

<sup>50</sup> 2019 IRP ES-3.

**C. TVA must evaluate the use of carbon-free technologies, *alone and in combination*, as alternatives to the Kingston Plant.**

TVA must expand its proposed alternatives analysis beyond a single carbon-free option to include all carbon-free technologies *alone and in combination*. First, TVA cannot lawfully ignore energy efficiency and demand response technologies in its analysis. The TVA Act requires the utility to consider energy efficiency and “to treat demand and supply resources on a consistent and integrated basis.”<sup>51</sup> TVA knows how cost-effective these resources are. In its own sensitivity analysis in the 2019 IRP, when artificial caps are removed, the planning model picks energy efficiency and demand response instead of new gas generation.<sup>52</sup> Specifically, the sensitivity analysis revealed that 1900 MW of energy efficiency and demand response displaces the need for new gas-fired combustion turbines like the plants proposed in TVA’s Alternative B.<sup>53</sup> The 2019 IRP also identifies demand response as a technology with the potential to provide the same reliability and flexibility as gas plants generally.<sup>54</sup> Second, TVA must evaluate carbon-free technologies in reasonable combinations as replacements for the Kingston Plant.

Specifically, in addition to proposed Alternative C, utility-scale solar and battery storage, the Kingston EIS must include these distinct alternatives:

- Distributed solar;
- Onshore wind;
- Demand response and energy efficiency;

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<sup>51</sup> 16 U.S.C. § 831m-1(2).

<sup>52</sup> TVA, 2019 IRP Working Group Presentation 52-57 (May 13, 2019).

<sup>53</sup> *Id.* at 55.

<sup>54</sup> 2019 IRP ES-1 (“Gas, storage and demand response additions provide reliability and/or flexibility.”).

- Solar (distributed and utility-scale), onshore wind, energy efficiency, demand response, and battery storage; and
- Purchased carbon-free power.

Lagging in each of these carbon-free resources,<sup>55</sup> TVA has tremendous room for growth. President Biden has ordered TVA to do its part to address the climate crisis, and the utility's alternatives analysis in the Kingston EIS must reflect the urgency of the moment. In short, the Kingston EIS should be dominated by the review of carbon-free options, and the methods and assumptions TVA uses to evaluate them, rather than the gas options proposed in TVA's Notice.

Further, TVA has committed to electrifying the transportation sector, with a goal to put 200,000 electric vehicles on the road by 2028,<sup>56</sup> and that figure is likely to expand exponentially from there. It is critical that TVA invest in low-cost, energy-saving resources like energy efficiency and demand response to make space for electric vehicles without increasing greenhouse gas emissions. Building gas-fired power generation would waste the carbon gains of electric transportation, trading one fossil fuel for another.

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<sup>55</sup> Solar and wind provide only three percent of TVA generation. TVA, Our Power System, <https://www.tva.com/energy/our-power-system> (last visited June 10, 2021). TVA's energy efficiency savings in 2019 were less than three percent of the U.S. average in 2019. Southern Alliance for Clean Energy, *Energy Efficiency in the Southeast* (Jan. 26, 2021), <https://bit.ly/3gcFMBC>. TVA's demand response programming could increase dramatically. In 2017, demand response provided peak savings of about three percent of the proposed summer peak. Price signals with enabling technology have the ability to function as automated demand response programming and provide median peak demand savings up to 35 percent. U.S. Dep't of Energy, *Final Report on Customer Acceptance, Retention, and Response to Time-Based Rates from the Consumer Behavior Studies* viii (Nov. 2016), <https://bit.ly/3zl6xuX>; see also Ahmad Faruqui, et al., *Time-Varying and Dynamic Rate Design*, Regulatory Assistance Project 31-31 (2012), <https://bit.ly/3iy3eee>.

<sup>56</sup> TVA, *Electric Vehicles*, <https://bit.ly/3kiBmLU> (last visited July 15, 2021).

Finally, even if replacing the Kingston Plant with carbon-free alternatives were inconsistent with the 2019 IRP—which it is not—the IRP is a broad planning document and “does not dictate a specific series of actions . . . at particular plants.”<sup>57</sup> The IRP “sets nothing in stone about the particular amount, or even the particular range” of a given generation source across TVA’s system, much less at specific facilities.<sup>58</sup> TVA must now evaluate a full range of carbon-free alternatives, alone or in combination, for meeting the purported capacity need created by the retirement of the Kingston Plant.

#### **IV. TVA MUST FULLY ASSESS THE IMPACTS OF THE PROPOSED ACTION AND ALL ALTERNATIVES ON THE ENVIRONMENT.**

##### **A. TVA must quantify greenhouse gas emissions and disclose the climate impacts of new gas plants.**

Because “[t]he harms associated with climate change are serious and well recognized,”<sup>59</sup> carefully considering a project’s climate impacts is critical to any NEPA review—particularly when the project may involve combusting

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<sup>57</sup> *Ky. Coal Ass’n, Inc. v. Tenn. Valley Auth.*, 804 F.3d 799, 803 (6th Cir. 2015) (quoting from TVA’s 2011 IRP and holding that TVA acted reasonably when exceeding the IRP’s range of projected coal retirements).

<sup>58</sup> *Id.* While significantly increasing distributed energy resources (DER) is consistent with the 2019 IRP, TVA must revisit its analysis of such an increase. The 2019 IRP’s use of a “total resource cost” metric disproportionately inflates TVA’s costs of DER by adding third-party costs. That analysis—which uniquely penalizes carbon-free sources without accounting for their climate benefits—is inconsistent with Executive Order 13990’s requirement that agencies “accurately determine the social benefits of reducing greenhouse gas emissions when conducting cost-benefit analyses of regulatory and other actions.” 86 Fed. Reg. at 7040.

<sup>59</sup> *Massachusetts v. EPA*, 549 U.S. 497, 521 (2007).

gas in power plants,<sup>60</sup> thereby emitting CO<sub>2</sub> and other greenhouse gases that drive climate change. In Alternatives A and B, TVA proposes to build new gas plants.<sup>61</sup> These plants will burn fossil fuels for decades, jeopardizing the dwindling opportunity to ward off the worst effects of climate change. The Kingston EIS must provide an accurate quantification of the greenhouse gas emissions of any proposed gas plants using the Social Cost of Carbon and discuss their environmental effects.

**1. TVA must accurately quantify the greenhouse gas emissions of any proposed gas plants using the Social Cost of Carbon.**

There is no action that contributes more significantly to climate change than building major fossil-fuel infrastructure like a new gas-fired power plant. TVA must accurately quantify and consider the greenhouse gas emissions associated with any gas plants proposed to replace the Kingston Plant. Associated emissions must account for burning gas and leaking methane, whether onsite or upstream.<sup>62</sup> TVA should quantify those impacts using the Social Cost of Carbon. Developed in 2010 and updated in 2016, the Social Cost of Carbon is a scientifically derived metric to “provide a consistent approach for agencies to quantify [climate change] damage in dollars.”<sup>63</sup> The Social Cost of Carbon translates a one-ton increase in CO<sub>2</sub> emissions into changes in atmospheric greenhouse gas concentrations, consequent changes in temperature, and resulting economic damages.<sup>64</sup> Those harms include

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<sup>60</sup> See *Sierra Club v. FERC*, 867 F.3d 1357, 1374 (D.C. Cir. 2017) (holding that FERC must analyze the climate change effects for a project whose purpose is to burn gas in power plants).

<sup>61</sup> Notice of Intent, 86 Fed. Reg. at 31781.

<sup>62</sup> Benjamin Storrow, Methane Leaks Erase Some of the Climate Benefits of Natural Gas, *Scientific American* (May 5, 2020), <https://bit.ly/3ixdumX>.

<sup>63</sup> *Fla. Se. Connection, LLC*, 162 FERC ¶ 61,233, at P 45 (Mar. 14, 2018).

<sup>64</sup> See Interagency Working Group on the Social Cost of Carbon, *Technical Support Document* at 2, 5 (Feb. 2010), available at <https://bit.ly/2TRF185>.



“changes in net agricultural productivity, human health, property damages from increased flood risk, and the value of ecosystem services.”<sup>65</sup> The current values, which adjust the 2016 values for inflation, estimate that every additional ton of CO<sub>2</sub> released from anywhere on Earth will cause an approximately \$51 in climate damages.<sup>66</sup> Not only will the Social Cost of Carbon convey the harms of new gas plants, but it allows TVA “to incorporate the social benefits of reducing carbon dioxide (CO<sub>2</sub>) emissions”<sup>67</sup> for evaluating carbon-free alternatives.

Executive Order 13990 instructed federal agencies to use the Social Cost of Carbon,<sup>68</sup> which has been widely endorsed by economists and scientists.<sup>69</sup> The Social Cost of Carbon is useful and appropriate here to meaningfully convey the impacts of building new gas plants—and thereby adding decades of greenhouse gas emissions—in comparison to carbon-free alternatives like energy efficiency, demand response, renewable energy, or battery storage.

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<sup>65</sup> *Id.* at 2.

<sup>66</sup> Interagency Working Group on Social Cost of Greenhouse Gases, Technical Support Document: Social Cost of Carbon, Methan, and Nitrous Oxide Interim Estimates under Executive Order 13990 at 5 (2021), <https://bit.ly/3xedCvG>; Jean Chemnick, *Cost of Carbon Pollution Pegged at \$51 a Ton*, Scientific American (Mar. 1, 2021), <https://bit.ly/35cDPys>.

<sup>67</sup> Interagency Working Group on the Social Cost of Carbon, *Technical Support Document*, *supra* n. 64, at 1.

<sup>68</sup> 86 Fed. Reg. at 7040.

<sup>69</sup> See Nat’l Acads. Sci., Eng’g & Med., *Valuing Climate Damages: Updating Estimates of the Social Cost of Carbon Dioxide* 3, 10–17 (2017), <https://bit.ly/3xenxBq>; Nat’l Acads. Sci., Eng’g & Med., *Assessment of Approaches to Updating the Social Cost of Carbon: Phase 1 Report on a Near-Term Update* 1 (2016), <https://bit.ly/3gt3AQz>; Richard L. Revesz et al., *Best Cost Estimate of Greenhouse Gas*, 357 Science 655 (2017).

## **2. TVA must disclose the climate impacts of building new gas plants to replace the Kingston Plant.**

Under NEPA, TVA must “quantify *and consider*” a project’s downstream greenhouse gas emissions, or explain why it cannot.<sup>70</sup> “The key requirement of NEPA . . . is that the agency consider and disclose the *actual environmental effects* in a manner that . . . brings those effects to bear on decisions to take particular actions that significantly affect the environment.”<sup>71</sup> Therefore, in the context of greenhouse gas emissions, NEPA review must “include a discussion of the ‘significance’ of this indirect effect . . . as well as ‘the incremental impact of the action.’”<sup>72</sup>

For the Kingston EIS, TVA should include a “qualitative summary discussion of the impacts of [greenhouse gas] emissions based on authoritative reports.”<sup>73</sup> Those effects include “more frequent and intense heat waves, longer fire seasons and more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, greater sea-level rise, more intense storms, harm to water resources, harm to agriculture, ocean acidification, and harm to wildlife and ecosystems.”<sup>74</sup>

These impacts are not theoretical, and burning fossil fuels is the problem, not the answer. Historically cold weather swept across the United States in February 2021,<sup>75</sup> devastating many Texans who were left without

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<sup>70</sup> *Sierra Club v. FERC*, 867 F.3d at 1375 (emphasis added).

<sup>71</sup> *Balt. Gas & Elec. Co. v. NRDC*, 462 U.S. 87, 96 (1983) (emphasis added). See 40 C.F.R. § 1502.16(a), (b) (2021) (requiring examination of effects and their significance).

<sup>72</sup> *Sierra Club v. FERC*, 867 F.3d at 1374.

<sup>73</sup> Council On Environmental Quality, Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews 10 (Aug. 1, 2016).

<sup>74</sup> *Id.* at 9.

<sup>75</sup> Oliver Milman, *Heating Arctic May Be to Blame for Snowstorms in Texas, Scientists Argue*, The Guardian (Feb. 17, 2021), <https://bit.ly/3vij9kC>.

power due in large part to failing gas facilities.<sup>76</sup> The same historic weather deprived many TVA-area residents of clean, reliable water for days, as freezing temperatures wreaked havoc on the water infrastructure of Memphis Light, Gas & Water, TVA's largest customer.<sup>77</sup> For TVA, the past three years have been the wettest years in 131 years of record keeping, and 2020 set the single-year record with rainfall 139 percent above normal.<sup>78</sup> These climate impacts should be top of mind for TVA, given its mission to manage the Tennessee River watershed and control flooding in the Valley. A robust discussion of actual and worsening climate effects like these is essential for NEPA review of TVA's generation decisions.

Considering reasonable alternatives, disclosing their greenhouse gas emissions, and discussing their environmental impacts, including through the Social Cost of Carbon, will ensure that TVA and the public have the information necessary to make a reasoned decision.

**B. TVA must use appropriate tools to fairly identify environmental justice populations and must assess the disproportionate harm to specific communities.**

People of color and low-wealth communities often bear a disproportionate burden of the pollution caused by power plants, compressor stations, and other industrial facilities.<sup>79</sup> Confronting this legacy is a priority

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<sup>76</sup> Erin Douglas, *Texas Largely Relies on Natural Gas for Power. It Wasn't Ready for the Extreme Cold*, Texas Tribune (Feb. 16, 2021), <https://bit.ly/3rWZgxD>.

<sup>77</sup> Samuel Hardiman, *Why Was Memphis' Water Infrastructure in Such Bad Shape? Politics Didn't Help*, Memphis Commercial Appeal (Feb. 22, 2021), <https://bit.ly/30FynCa>.

<sup>78</sup> *TVA Calls 2020 the Wettest Year on Record for Tennessee Valley Authority*, WBIR (Jan. 5, 2021), <https://bit.ly/3tg5xo5>.

<sup>79</sup> *Friends of Buckingham v. State Air Pollution Control Bd.*, 947 F.3d 68, 87 (4th Cir. 2020) (quoting Nicky Sheats, *Achieving Emissions Reductions for Environmental Justice Communities Through Climate Change Mitigation Policy*, 41 Wm. & Mary Env'tl. L. & Pol'y Rev. 377, 382 (2017) ("There is

of the federal government.<sup>80</sup> In January, President Biden declared that the federal government “must deliver environmental justice in communities all across America” and that federal agencies “shall make achieving environmental justice part of their missions.”<sup>81</sup> NEPA review is an important opportunity for agencies to implement these environmental justice goals, and it is critical that TVA do this analysis in the Kingston EIS. In doing so, TVA must be mindful to use appropriate tools to fairly identify environmental justice populations and must assess the disproportionate harm to specific communities.

“The purpose of an environmental justice analysis is to determine whether a project will have a disproportionately adverse effect on minority and low-income populations.”<sup>82</sup> Broadly speaking, this requires two steps. First, an agency must correctly identify the environmental justice communities in the vicinity of the proposed action.<sup>83</sup> But it should be circumspect when relying solely on desktop demographic tools like EPA’s EJSCREEN and census data. The analysis provided by these tools can often

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evidence that a disproportionate number of environmental hazards, polluting facilities, and other unwanted land uses are located in communities of color and low-income communities.”)).

<sup>80</sup> 86 Fed. Reg. at 7629 (“To secure an equitable economic future, the United States must ensure that environmental and economic justice are key considerations in how we govern.”).

<sup>81</sup> *Id.* at 7622, 7629.

<sup>82</sup> *Friends of Buckingham*, 947 F.3d at 87 (quoting *Mid States Coal. for Progress v. Surface Transp. Bd.*, 345 F.3d 520, 541 (8th Cir. 2003)).

<sup>83</sup> *Standing Rock Sioux Tribe v. U.S. Army Corps of Eng’rs*, 255 F.Supp.3d 101, 136-37 (D.D.C. 2017) (citing Council on Environmental Quality, Environmental Justice Guidance Under the National Environmental Policy Act (Dec. 10, 1997)); *Friends of Buckingham*, 947 F.3d at 88 (“The minority EJ community designation is important because, if Union Hill is considered a minority EJ community, then information about African American populations having a greater prevalence of asthma and other health issues is an important consideration.” (internal quotation marks and brackets omitted)).

be too coarse to detect the presence of environmental justice communities concentrated in a small area.<sup>84</sup> As EPA itself has cautioned, “[t]he fact that census data can only be disaggregated to certain prescribed levels (*e.g.*, census tracts, census blocks) suggests that pockets of minority or low-income communities, including those that may be experiencing disproportionately high and adverse effects, may be missed in a traditional census tract-based analysis.”<sup>85</sup> Outreach in potentially impacted areas to identify people of color and low-wealth communities is critical.<sup>86</sup> EPA recommends supplementing census data with local demographic data and research,<sup>87</sup> and specifically notes that EPA staff does not use EJSCREEN “[a]s a means to identify or label an area as an ‘EJ community’” or “[a]s a basis for agency decision-making or making a determination regarding the existence or absence of EJ concerns.”<sup>88</sup>

Second, once the agency has identified environmental justice communities, it must assess the disproportionate impacts of the project on the people in those specific communities. In the air quality context, the Fourth Circuit Court of Appeals held in *Friends of Buckingham v. State Air Pollution Control Board* that “blindly relying on ambient air standards is not a sufficiently searching analysis of air quality standards for an EJ

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<sup>84</sup> *Friends of Buckingham*, 947 F.3d at 88-89; *cf. Standing Rock Sioux Tribe*, 255 F.Supp.3d at 137 (“the ‘unit of geographic analysis’ for the environmental-justice assessment should ‘be chosen so as not to artificially dilute or inflate the affected minority population.’”) (quoting CEQ, Environmental Justice Guidance, *supra*, at 26).

<sup>85</sup> EPA, Final Guidance for Incorporating Environmental Justice Concerns in EPA’s NEPA Compliance Analyses § 2.1.1 (April 1998), *available at* <https://bit.ly/3r7w7zj>.

<sup>86</sup> CEQ, Environmental Justice Guidance, *supra* n. 83, 4, 9-13.

<sup>87</sup> *See* Federal Interagency Working Group on Environmental Justice, Promising Practices for EJ Methodologies in NEPA Reviews 21 (Mar. 2016), *available at* <https://bit.ly/306MZdi>.

<sup>88</sup> EPA, How Does EPA Use EJSCREEN?, <https://bit.ly/3wDhzJH> (last visited July 15, 2021).

community.”<sup>89</sup> The Fourth Circuit had good reason to dismiss the notion that mere compliance with NAAQS means there will be no disproportionate adverse health risks. Whether a facility would allow an area to comply with air quality standards is distinct from whether it would have a disproportionately high and adverse effect on environmental justice populations. Otherwise, consideration of disproportionate harm would be required only for facilities that would contribute to a violation of such air quality standards—and thus could not lawfully be built.<sup>90</sup> Instead, the agency must examine the impacts of the pollutants from the proposed facility with an analysis “tailored to [the] specific EJ community.”<sup>91</sup> Some air pollutants, like fine particulates, have harmful effects even when air quality standards are not violated.<sup>92</sup> TVA violates NEPA when it falls back on compliance with Clean Air Act permits limits as its sole justification for a “not significant” finding.

TVA must heed these guidelines in conducting its environmental justice analysis for the Kingston EIS.

**C. TVA must perform site-specific analyses for all proposed generation facilities.**

TVA must perform site-specific analyses to determine proposed generation facilities’ potential impacts on each community. Under Alternative B, TVA would construct combustion-turbine gas plants “at

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<sup>89</sup> *Friends of Buckingham*, 947 F.3d at 93.

<sup>90</sup> EPA, Final Guidance for Incorporating Environmental Justice Concerns in EPA’s NEPA Compliance Analysis, *supra* n. 85, at § 3.2.2 (explaining that even harms that are not “significant” in NEPA context may disproportionately or severely harm environmental justice communities).

<sup>91</sup> *Friends of Buckingham*, 947 F.3d at 90-92.

<sup>92</sup> *Id.* at 92 (“[E]ven when NAAQS are not violated as to this particulate matter, the record reflects that exposure to PM<sub>2.5</sub> will increase the risk of asthma, heart attacks, and death.”); *Am. Trucking Ass’n v. EPA*, 283 F.3d 355, 360 (D.C. Cir. 2002) (recognizing the “lack of a threshold concentration below which [particulate matter and ozone] are known to be harmless”).

alternate locations.”<sup>93</sup> Under Alternative C, TVA would construct and operate solar and storage facilities “at alternate locations.”<sup>94</sup> TVA’s scoping notice does not indicate where these “alternate locations” might be or how the agency will analyze impacts to those communities.

NEPA requires TVA to consider the full scope of site-specific impacts for its decision to build new generation. Agencies must “[d]iscuss each alternative considered in detail,” disclosing and analyzing the reasonably foreseeable effects of proposed actions.<sup>95</sup> To the extent the agency proposes to “tier” its analysis from a broader programmatic EIS to subsequent NEPA review that is narrower in scope, such tiering should not allow the agency to obscure the extent of site-specific environmental impacts or to artificially narrow the alternatives available during site-specific analysis.<sup>96</sup> NEPA “emphasizes the importance of coherent and comprehensive up-front environmental analysis to ensure informed decision making to the end that ‘the agency will not act on incomplete information, only to regret its decision after it is too late to correct.’”<sup>97</sup>

To fully inform itself and the public before making its decision, TVA must consider the site-specific impacts of the proposed renewable and gas facilities, including any related infrastructure, such as transmission lines, compressor stations, and gas pipelines. It is impossible to meaningfully

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<sup>93</sup> Notice of Intent, 86 Fed. Reg. at 31781.

<sup>94</sup> *Id.*

<sup>95</sup> 40 C.F.R. § 1502.14, 1508.1(g).

<sup>96</sup> *California v. Block*, 690 F.2d 753, 761 (9th Cir. 1982) (“The critical inquiry in considering the adequacy of an EIS prepared for a large scale, multi-step project is not whether the project’s site-specific impact should be evaluated in detail, but when such detailed evaluation should occur.”); *id.* at 763 (“[T]he promise of site-specific EIS’s [sic] in the future is meaningless if later analysis cannot consider wilderness preservation as an alternative to development.”).

<sup>97</sup> *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1216 (9th Cir. 1998) (quoting *Marsh v. Or. Nat. Res. Council*, 490 U.S. 360, 371 (1989)).

analyze local pollution and land use in the abstract, and TVA cannot analyze environmental justice impacts at all without considering the unique histories and burdens of real communities. NEPA’s “twin aims” require TVA to consider “every significant aspect of the environmental impact of a proposed action”<sup>98</sup> and to “inform the public” that it has fully considered those impacts during the decision-making process.<sup>99</sup> To comply with NEPA, TVA must disclose and consider site-specific impacts before selecting or ruling out an alternative in the Kingston EIS.

**D. TVA must consider impacts to the region’s protected lands and waterways.**

TVA must disclose and analyze potential adverse impacts to the protected lands and waterways near the Kingston Plant. East Tennessee is home to some of the country’s most beautiful forests, parks, and rivers. The Great Smoky Mountains National Park is one of the most visited national parks, world-renowned for its biodiversity and breathtaking views. The Kingston Plant’s air emissions impair visibility in many of the region’s pristine Class I areas, primarily in the Great Smoky Mountains National Park, where Kingston has been the fourth-largest source of regional haze.<sup>100</sup> TVA must disclose and analyze the air quality impacts of the proposed Kingston retirement, as well as any replacement infrastructure, on the public lands of East Tennessee and regional Class I areas, including the Great Smoky Mountains National Park.

TVA must also ensure that any potential infrastructure projects, such as pipelines or transmission lines, do not impair the nearby Obed Wild and Scenic River. Designated a “wild river area,” the Obed’s shorelines are

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<sup>98</sup> *Baltimore Gas & Elec. Co.*, 462 U.S. at 97 (quoting *Vermont Yankee Nuclear Power Corp. v. NRDC*, 435 U.S. 519, 553 (1978)) (emphasis added).

<sup>99</sup> *Id.* (citing *Weinberger v. Catholic Action of Haw.*, 454 U.S. 139, 143 (1981)).

<sup>100</sup> See National Parks & Conservation Association, Sources of Visibility Impairing Pollution, *supra* n. 24.



“essentially primitive” and its “waters unpolluted.”<sup>101</sup> The Wild and Scenic Rivers Act requires that the Obed remain essentially primitive and unpolluted.<sup>102</sup> Therefore, TVA must disclose, analyze, and prevent any harms to the Obed Wild and Scenic River.

## **CONCLUSION**

For these reasons, we urge TVA to prepare a draft EIS for the retirement of the Kingston Fossil Plant that embraces President Biden’s 2035 decarbonization mandate and TVA’s critical role in addressing the climate crisis.

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<sup>101</sup> *See* 16 U.S.C. § 1273(b)(3).

<sup>102</sup> *See id.* § 1281(a).



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-0435

DAVID W. SALYERS, P.E.  
COMMISSIONER

BILL LEE  
GOVERNOR

July 14, 2021

**Via Electronic Mail to [nepa@tva.gov](mailto:nepa@tva.gov)**

Attn: Chevales Williams, NEPA Specialist  
1101 Market Street, BRC 2C  
Chattanooga, TN 37402  
Tel: 423-751-7316  
Email: [cwilliams1@tva.gov](mailto:cwilliams1@tva.gov)

Dear Ms. Williams:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority's (TVA) Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF). The NOI also describes planned construction and operation activities for facilities to replace the retired generation from KIF of approximately 1,450 MW. There are three alternatives described in the NOI: 1) Retirement of KIF and construction of a Combined Cycle Combustion Turbine Gas Plant at the same location; 2) Retirement of KIF, investment in local and regional transmission, and construction and operation of Simple Cycle Combustion Turbine (CT) Gas Plants at different locations; and 3) Retirement of KIF and construction and operation of Solar and Storage Facilities, mostly at other locations. TDEC has reviewed the NOI and offers the following comments regarding activities subject to its purview or related to its subject matter expertise. TDEC acknowledges that there is limited detail available in the NOI and plans to submit additional, detailed comments on planned activities upon release of a Draft EIS. TDEC also encourages the TVA to consult with relevant local parties for actions which might be subject to local agency approval.

**Air Pollution Control**

Activities described in the NOI include demolition and renovation of structures. There are federal and state regulations in place regarding asbestos renovation and demolition activity that are enforced by the U.S. Environmental Protection Agency and TDEC's Division of Air Pollution Control, respectively. These regulations apply to any building or structure known to contain asbestos or to any buildings proposed to be renovated or demolished. When any structures are proposed to be renovated or demolished, an asbestos demolition notification must be provided in advance and proper pre-demolition surveys must be conducted to identify any regulated asbestos containing material (ACM) present. Prior to any demolition or renovation, all facilities must be examined for ACM and all potential ACM in the buildings proposed for renovation or demolition must be handled and disposed of according to the applicable federal, state, and local regulations. TDEC requests that these considerations be reflected in the Draft EIS.

Dust emissions generated by demolition and renovation activities can vary substantially depending on the levels of activity, specific operations, and prevailing meteorological conditions. These emissions are likely to be short term and temporary in nature. TDEC recommends that ordinary dust control measures be employed to mitigate any dust emissions generated. These measures may include using water spray to wet areas likely to generate fugitive dust during on-site construction activities as needed. TDEC also notes that fugitive dust may be generated by activities described in the NOI and points the TVA to review specific requirements<sup>1</sup> to prevent fugitive dust, including use, where possible, of asphalt, water, or suitable chemicals to limit its creation. TDEC requests that these considerations be reflected in the Draft EIS.

For any site-clearing activities that occur, TDEC recommends disposal methods other than open burning if found to be practical. TDEC notes that no expressly prohibited materials<sup>2</sup> may be burned. Additionally, TDEC recommends employment of good smoke management practice if any open burning activities occur. TDEC requests that these considerations be reflected in the Draft EIS.

TDEC suggests that the TVA consider the use of idle restrictions for heavy construction equipment and dump trucks in use on-site to minimize emissions from these activities. TDEC also recommends that all construction equipment employed on-site be well maintained and equipped with the latest emissions control equipment. TDEC requests that these considerations be reflected in the Draft EIS.

For any new air pollution sources that will be built as a result of these activities, TVA is required<sup>3</sup> to submit an application for a construction permit not less than 90 days prior to the estimated start date of construction for minor new source review and not less than 120 days prior to the estimated start date of construction for a new source review. TDEC requests that these considerations be reflected in the Draft EIS.

### **Cultural and Natural Resources**

Based on the information provided in the NOI, TDEC finds that no significant archaeological resources will be disturbed because of the planned activities. The retirement of the KIF will not adversely affect cultural resources. However, any additional construction associated with potential alternatives could disturb archaeological resources and implementation of the proposed alternatives should be coordinated in consultation with the State Historic Preservation Office (SHPO). TDEC requests that these considerations be reflected in the Draft EIS.

### **Water Resources**

TDEC notes that the TVA will need individual construction stormwater permits under the National Pollutant Discharge Elimination System (NPDES) permit program. TDEC also notes that the TVA will need individual Aquatic Resource Alteration Permits (ARAP) for planned activities, including the possibility for multiple ARAPs depending on the alternative selected and the number of construction sites. TDEC requests that these considerations be reflected in the Draft EIS.

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<sup>1</sup> TAPCR 1200-03-08, <https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm>

<sup>2</sup> TAPCR 1200-03-04-.03, <https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm>

<sup>3</sup> TACR 1200-03-09.01(1)(b), <https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm>

## General

TDEC is pleased to see the inclusion of solar and storage in the alternative actions planned for the Draft EIS.

TDEC would also like the TVA to include additional information about how existing and future coal combustion residuals (CCRs) will be handled at the Kingston site as part of the retirement.

TDEC appreciates the opportunity to comment on this NOI. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication of future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Jennifer Tribble, PhD

Senior Policy Analyst, Office of Policy and Sustainable Practices

Tennessee Department of Environment and Conservation

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**SENATOR KEN YAGER**

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**Senate Chamber  
State of Tennessee**  
NASHVILLE

**SENATE REPUBLICAN  
CAUCUS CHAIR**

COMMITTEE MEMBER  
FINANCE, WAYS AND MEANS  
STATE AND LOCAL GOVERNMENT  
JOINT FISCAL REVIEW  
ETHICS  
TACIR

July 8, 2021

Mr. Chevales Williams  
NEPA Compliance Specialist  
Tennessee Valley Authority  
1101 Market Street  
BRC 2C  
Chattanooga, Tennessee 37402

RE: Proposed Retirement of Kingston Fossil Plant Comments

Dear Mr. Williams:

I am writing to you today as a member of the Tennessee State Senate representing Roane county and six counties located adjacent to or nearby the Kingston Fossil Plant. The Kingston Plant has served the citizens of this region well by providing responsible service since 1955 and has received commendations for its efficiency over the years.

The notice of intent suggests three alternative actions. Most important is that whatever alternative is chosen, it must provide uninterruptible electrical service for twenty-four hours a day, 365 days a year. Many of the new technologies on the market today are fraught with intermittency; that is, they do not operate if certain weather conditions are not present. If these technologies are chosen to power our future electric system, we also must pay to have extensive battery back-up systems or other plants in place to deal with the intermittency issues. While battery systems are gaining efficiency and effectiveness, they are not yet ready to provide lasting support to a community in the event of a major, and extensive, long-term outage.

The scope of TVA's environmental impact statement (EIS) includes an acceptable option to continue to operate the Kingston Plant with regulatory updates. It is unfortunate that these regulatory updates as well of the addition of the scrubber system in 2008 could not have been made earlier so that the plant, and the jobs associated with it, could continue operation at the same location in the future. Please seriously consider continued operation.

If the Kingston Plant cannot be updated and continue operation, an acceptable solution is alternative "A", the development and operation of a Combined Cycle Combustion Turbine Gas Plant at the same site. Regarding option "B", it is important for our citizens to have affordable, reliable, resilient, sustainable energy technologies that are close to the people who rely on them.



Importing energy from other states and long distances is less reliable and not an option that we will support.

Option "C," the retirement of Kingston replaced by solar and storage facilities at alternate locations is acceptable only if the storage facilities can sustain our service territory over a period of at least five days during a snowstorm or other transformational weather event. Under some of these options it may prove necessary to build natural gas pipelines and invest in transmission upgrades. We will support those measures if required.

We appreciate that the scoping process, integral to implementing the National Environmental Policy Act, will provide for a thorough and balanced Environmental Impact Statement, fair and just in its record of decision. We welcome the opportunity to comment on the draft EIS when it is made available, since we are the parties most at risk in this decision-making process. Thank you for the opportunity to provide these comments.

Sincerely,

Ken Yager  
Senator

KY: jrr

**From:** [Gissentanna, Larry](#)  
**To:** [Williams, A Chevales](#)  
**Cc:** [Kajumba, Ntale](#)  
**Subject:** Scoping comments for the TVA's Kingston Retirement of Nine Coal Fired Units EIS  
**Date:** Sunday, July 18, 2021 3:23:19 PM

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**This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the "Report Phishing" button located on the Outlook Toolbar at the top of your screen.**

Chevales Williams  
NEPA Specialists  
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Chattanooga, TN 37402

Dear Mr. Williams,

The U. S. Environmental Protection Agency (EPA) is in receipt of and has reviewed the subject document in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. We understand that Tennessee Valley Authority's recent evaluation confirms that the aging coal fleet is among the oldest in the nation and is experiencing deterioration of material condition and performance. Therefore, TVA intends to prepare an Environmental Impact Statement (EIS) to assess the impacts associated with the proposed retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF) and the construction and operation of facilities to replace the retired generation. We also understand TVA's goal is to recover the generation capacity lost from retirement of the KIF units and to account for future load growth. TVA is proposing the addition of approximately 1,450 MW of replacement generation.

Based on our review of the scoping documents and participation in the virtual scoping public meeting on June 29, 2021, it appears that the proposed improvements are reasonably consistent with the current land use of the KIF.

Alternatives Considered: Under this action TVA plans to consider three action alternatives in the proposed EIS:

- (A) Retirement of KIF and construction and operation of a Combined Cycle Combustion Turbine (CC) Gas Plant on the KIF reservation
- (B) Retirement of KIF, investment in local and regional transmission, and construction and operation of Simple Cycle Combustion Turbine (CT) Gas Plants at alternate locations
- (C) Retirement of KIF and construction and operation of Solar and Storage Facilities primarily at alternate locations

The EPA has the following comments:

Although these or other alternatives are reasonable, some alternatives may warrant further consideration under NEPA and should be determined in the preparation of this EIS. Please use the

NEPAssist tool (<https://www.epa.gov/nepa/nepassist>) and other more localized information when conducting the NEPA analysis. NEPAssist combines multiple Geographic Information System (GIS) and internet databases to help screen for environmental concerns.

**Water Quality:** This proposed action has the potential to disturb a considerable amount soil. A state or county construction stormwater permit will be required before construction can begin. Construction may impact nearby Clinch-Lower River or other surface water bodies and best management practices should be applied to protect these water bodies before and after construction. Outfall monitoring and sampling should be analyzed alongside the impairment status of water bodies since base outfalls contribute to impairments.

**Air Quality:** This project site is within an attainment area for air quality standards, however localized impacts to air quality could occur during demolition and construction due to equipment exhaust emissions and fugitive dust. The EPA recommends implementing measures to reduce dust, diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies. We also encourage controlling fugitive dust by watering or the application of other engineered controlled methods.

**Environmental Justice:** Consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (<https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actionsaddressenvironmental-justice>), please ensure protected populations are not disproportionately or adversely impacted by the project. We also promote compliance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable. Please consider using the EJSCREEN tool (<https://www.epa.gov/ejscreen>) as part of the NEPA analysis. EJSCREEN combines environmental and demographic data to help determine environmental justice concerns that are integral to the NEPA process.

**Energy and Recycling:** Efforts should be made to divert any recyclable materials such as concrete, steel and asphalt away from landfills and repurpose the material instead. The appropriate NEPA document should also address potential environmental impacts to construction workers, to include the hazards of demolishing the older structures, such as from lead and asbestos latent materials. Project management should consider sustainable building practices that utilize variable forms of proven renewable energy for the proposed project, for example, solar power for supplemental electricity and lighting for the, parking lots, or special buildings that may be proposed in the various projects. Please see the following link for additional information:  
[http://www.wbdg.org/references/federal\\_mandates.php](http://www.wbdg.org/references/federal_mandates.php).

Thank you for the opportunity to provide comments on the proposed project at Kingston Fossil Plant. Please provide [Kajumba.Ntale@EPA.GOV](mailto:Kajumba.Ntale@EPA.GOV) Chief, NEPA Section, with an electronic version of the draft EIS for further review. In addition to your NEPA documents. please remember to keep the local community informed and involved throughout the project process through community meetings and through local and social media outlets. If you have any questions, feel free to contact me via the information provided below.



Sincerely,

*Larry O. Gissentanna*

Project Manager, DoD & Federal Facilities

U.S. Environmental Protection Agency/ Region 4

Strategic Programs Office, NEPA Section

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### TVA Kingston Scoping Period Comment Report

Comment Date	Subject	Comment	Comment Tone	Project Phase	First Name (Person)	Last Name (Person)	Zipcode
Jun 16, 2021	Kingston	I would prefer solar energy storage over gas powered turbines.	mixed	scoping	Nichole	Proctor	37748
Jun 21, 2021	KIF Retirement & Replacement Opinions	<p>1. I prefer solar for KIF replacement generation, provided solar can be done without a major increase in electricity rate or reduction in reliability. If this isn't possible, I prefer the simple cycle natural gas alternative.</p> <p>2. EIS considerations should potential changes to visual assets; air, water, and ground pollution; demolition, construction, and operation noise; and potential for major disaster affecting the public or the environment.</p> <p>3. Demolition of KIF must certainly insure that hazardous materials are not released to the waterways, the air, or the ground to the extent that they can't be completely removed.</p> <p>4. What will happen to the fly ash that is already stored on the site if a combined cycle plant is built in Kingston? Is there room to build the CC plant before the coal plant is dismantled? The public and the environment must be protected from hazardous materials in the fly ash forever.</p> <p>5. Combined and simple cycle natural gas plants don't solve the environmental carbon problem, so please don't pretend they do. Carbon dioxide is the same regardless of whether it comes from burning coal or natural gas.</p>	mixed	scoping	Joseph	Kintz	37748
Jun 28, 2021	Retiring Kingston coal plant	I appreciate this opportunity to comment, as well as your public open house on June 29. I understand that COVID protocol prevented an in-person meeting, but am hoping that, as COVID restrictions are relaxing, TVA will provide an in-person open house before the EIS scoping period ends. I am concerned about replacing a coal plant with gas. There is much to be considered in this EIS, not the least of which is the necessity of phasing out fossil fuels as quickly as possible in order to achieve net-zero GGH emissions. Any perceived upfront cost difference between renewable energy sources as compared to fossil fuels is a short-sighted basis for choosing the latter. Please evaluate your proposed alternatives as an investment in your customers' futures. Thank you.	mixed	scoping	JoAnn	McIntosh	37043
Jun 29, 2021	Kingston Coal Plant	When the Kingston coal plant is retired, it can not be replaced by more fossil fuels. This area has already been buried in coal ash once. Meanwhile, we're facing a global catastrophe and simply can't afford to release more carbon into the atmosphere. Besides that, the costs of solar power generation and storage have fallen dramatically to the point where multiple studies conclude it's now less expensive to build new solar capacity than continue operating fossil plants. It makes neither environmental or economic sense to continue with fossil fuels.	mixed	scoping	Charlie	Cantrell	37763
Jun 29, 2021	Kingston Steam Plant	I support TVA's efforts to stop using coal to produce electricity. I hope TVA will continue to operate electricity production using some other non polluting method at the Kingston site.	positive	scoping	Celia	Simon	37763
Jun 29, 2021	Solar Alternative	I like solar as an adjunct to gas generation.	positive	scoping	Hugh	Willet	37763
Jul 1, 2021	KIF Retirement Solution	<p>Regarding the replacement of KIF, why is a fossil fuel being considered at all when the economic efficiency of solar and batteries is expected to be better than gas by the late 2020s at the latest (if not already)? It's already 2021, this project will take multiple years, and we don't need to build pipes or major infrastructure for services that will only be the most efficient for a couple of years. Infrastructure should always be shaped with the LONG TERM in mind.</p> <p>Additionally, though fields of solar panels certainly can be used, why is there not a greater push to make a truly distributed infrastructure by subsidizing home owners and business owners to add solar panels and storage batteries and sell their excess electricity back to the TVA? If affordable AND able to earn the cost back in a few years, many more home owners would not only be empowered but excited by this opportunity -- MYSELF INCLUDED. The home owners and business owners could ensure their own consistent, reliable, free (after installation) energy source AND earn money back WHILE contributing to the energy available to their own community.</p> <p>For many, many reasons -- beyond the also important considerations of public safety and environmental preservation -- I look forward to hearing that solar will be used to replace KIF. And I eagerly await a clear, public push to subsidize a truly distributed power grid throughout TVA's coverage area.</p>	mixed	scoping	Anna	Matsen Cantrell	37763-2005
Jun 23, 2021	no subject	<p>Seems crazy to un-needlessly punish your customers with higher electricity prices. The logical and safe choice is to have both coal &amp; nat gas capabilities. Install best available technology (proven &amp; reasonable) on say 5 of the units, and convert 4 units to gas. We dont want to be a political football in the church of climatology. Look no further than brownouts and blackouts in California and Texas. We want affordable and non-weather dependent electricity!</p> <p>C.Hopkins</p>	mixed	scoping	C	Hopkins	
Jun 17, 2021	Comment on possible closure of Kingston Fossil Plant	<p>I propose an alternative to existing proposals for replacement of existing plant.</p> <p>As plant is demolished replace with Small Modular Reactor (SMR) using the same site. Demolish only the units necessary to house a SMR. Once first SMR is complete, continue cycle of demolishing additional units and replacing them with a SMR until all 9 coal units are demolished.</p> <p>Existing coal units can continue operation until demolition begins on that unit.</p> <p>Consider use of a Korean EPC firm with proven nuclear experience.</p>	neutral	scoping	Jack	Keeling	
Jun 22, 2021	ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0237 - NOI TVA to Prepare an EIS for Kingston Fossil Plant Retirement Project, Tennessee	The USGS has no comment at this time. Thank you.	neutral	scoping	Brett	Kopec	

Jun 18, 2021	Retiring the Kingston Coal Plant	<p>Jeff Lyash, CEO Tennessee Valley Authority 400 West Summit Hill Drive Knoxville TN 37902 (865) 632-2101 jefflyash@tva.com</p> <p>Chairman Ryder &amp; Members of the Board Tennessee Valley Authority 400 West Summit Hill Drive Knoxville TN 37902 tvainfo@tva.com</p> <p>Re: Retiring the Kingston Coal Plant</p> <p>Dear Gentlemen:</p> <p>This week, the Tennessee Valley Authority (TVA) announced its intent to prepare an Environmental Impact Statement (EIS) for the retirement of the Kingston Fossil Plant in Roane County, Tennessee. Through the upcoming EIS process, TVA will identify the timeline to retire the plant's nine coal units and options for replacement generation.</p> <p>More than 12 years after one of the worst environmental disasters in U.S. history, the effects of the Kingston coal ash spill continue to have a lasting impact on the community. Those who have remained have focused on building a safe and thriving community, reclaiming their legacy through perseverance and resilience.</p> <p>TVA has a great opportunity with the closure of Kingston to be a leader in clean energy technologies, in re-establishing strong unions, and improving air and water quality for my children and future generations.</p> <p>TVA is currently considering replacing the Kingston and Cumberland coal burning plants with new fracked gas plants or solar and storage technologies.</p> <p>Kingston's history of operational, safety, and environmental problems, as well as the ongoing risk of coal ash contamination to local water resources, have long cast a shadow on the plant. The growing interest by TVA's customers in reliable, cost-effective clean energy investments means that Roane County and the surrounding region is better positioned today than ever to achieve climate and clean energy goals without risky coal or gas plants. TVA must ensure this decision protects public health and our environment, and pays special focus to</p>	neutral	scoping	Robert	Rutkowski	
		<p>the communities and workers at the plant, making sure they receive support in the transition to a future without coal in the Tennessee Valley.</p> <p>Making plans to retire the Kingston coal plant is an opportunity for TVA to transform a troubled relationship by eliminating a cause of deep residual pain while engaging with a community eager for the benefits of clean energy investment.</p> <p>Yours sincerely, Robert E. Rutkowski</p> <p>cc: Legislative Correspondence Team Longworth House Office Building Washington DC 20515 keith.abouchar@mail.house.gov</p> <p>2527 Faxon Court Topeka, Kansas 66605-2086 P/F: 1 785 379-9671 E-mail: r_e_rutkowski@att.net</p>					
Jun 16, 2021	Kingston coal plant	<p>Now's just not inappropriate time to be considering such a drastic and desperate move with the economy and the lack of proper representation this country is facing at this time it's poses too much risk to the communities into the people who work very hard every day to try to sustain their families we're just coming out of a oppression in the last thing that we the people need is another oppression and people losing their jobs and putting Tennessee unemployment benefits at risk , family welfare at risk the increase in welfare benefits that it's going to cause in a lack of financial Independence that people are just not trying to recover from please reconsider just now is not a good time.</p>	negative	scoping	Julia	Clark	

Jun 16, 2021	Public comment regarding retirement of TVA Kingston Fossil plant	<p>Hi,</p> <p>I read an article today June 16, 2021 which said that TVA was requesting public input about the future of the Kingston Fossil plant.  <a href="https://www.wate.com/news/local-news/tva-calling-for-public-input-on-kingston-fossil-plant-retirement/">https://www.wate.com/news/local-news/tva-calling-for-public-input-on-kingston-fossil-plant-retirement/</a></p> <p>My family and I live on a farm a few miles away from the Kingston Fossil plant.          If the wind is blowing a certain direction we can smell the exhaust from the Kingston coal power plant on our farm, even though the plant is using the newer "clean" scrubber smoke stacks.          We know people whose health has been negatively affected by the TV Kingston coal plant.          Coal ash storage remains an ongoing problem.          Yes, it is time to retire the TVA Kingston Fossil plant.</p> <p>I would go further and suggest that retiring the Kingston Fossil plant would be a good first step but the long term plan for the site should be to remove all of the man-made "improvements" and restore the site to it's original natural condition and make the site into a public park or wildlife area.</p> <p>Regards,</p> <p>Chip Piller          Oakdale, TN</p>	neutral	scoping	Chip	Piller	
Jun 16, 2021	Tennessee Kingston Power Plant ~ public input	<p>Tennessee Valley Authority</p> <p>The article I just read stated that you were looking for comments about the proposed closing of the Kingston Fossil Plant.          Why is this coal fired power plant being shut down? Is it because of CO2 emissions? If so then lets deal with the CO2 emissions.          How many families livelihood are dependent on this power plant and industry? If this coal fired power plant were to operate with less CO2 emissions going into the atmosphere than what a natural gas power plant puts out, would this power plant then continue to operate?          America needs to be Energy Wise. We have over 500 years of good quality coal that needs to be used to provide 24/7/365 reliable electricity. America has more Btu's in our coal than we have in our natural gas and oil combined.          We would be very pleased to show TVA how the Sidel Carbon Capture Utilization System can affordably keep Tennessee's coal fired power plants operating ~ Profitably.  <a href="https://youtu.be/RQRQ7S92_lo">https://youtu.be/RQRQ7S92_lo</a></p> <p>Looking forward to your reply.</p> <p>Have A Fantastic Day!          Sid Abma CEO, Sidel Global Environmental</p> <p>Phone: (805) 462-1250          Email: Sid@SidelGlobal.com          Website: www.SidelGlobal.com</p>	neutral	scoping	Sid	Abma	
Jul 3, 2021	The need for a rapid draw down in natural gas use.	<p>In watching and reading TVA's analysis of the three options for replacing the energy from the Kingston Fossil Plant, I saw no mention of the urgency of pulling back on natural gas deployment - urgency expressed in two different reports released back in April. A United Nations report warned that the world needs to start drawing down methane emissions far more rapidly than it's been doing to avert critical levels of warming. A few days later new research published in the journal Environmental Research Letters revealed that if world leaders put their all into reducing methane pollution, it could slow the planet's rate of warming by up to 30% in the near term. By putting far more emphasis and detail into the natural gas alternatives than into the solar one, TVA shows little indication that they've kept up to date on these reports, especially when those gas alternatives include hundreds of miles of new gas pipelines. Pipeline ruptures are not uncommon, and a recent drastic rupture of a gas pipeline in the Gulf of Mexico is a stunning reminder of the danger of continuing this method of energy production. TVA needs to use its considerable engineering expertise to rapidly cut back on natural gas use and make up the difference with aggressive renewable deployment and equally aggressive energy efficiency measures. Both are capable of making a substantial difference in our climate prospects. Let's show some concern for our descendants and drop the gas plans.</p>	neutral	scoping	Kent	Minault	37917
Jun 29, 2021	Kingston Steam Plant Closure	<p>TVA's recent decisions to consider closing its coal-fired steam plants, including Kingston, is a welcome, though overdo, change of position. However, it seems TVA favors replacing these coal-fired plants with natural gas plants. TVA talks of implementing lower carbon emission technologies; however, to achieve net zero carbon (even by 2050) TVA needs to be implementing zero emissions technologies. The current scientific consensus is that carbon emissions must end this decade, not three decades from now. President Biden's climate policies acknowledge this scientific consensus and seek to eliminate carbon emissions by 2035. Thus, the TVA's goals of achieving net zero emissions by 2050 are a decade and a half insufficient. The TVA cannot achieve net zero emissions, even by 2050, by building new carbon emitting natural gas plants today. Currently 15 electric utilities have committed to producing 100% carbon free electricity and the majority of those have adopted more aggressive schedules than the TVA (<a href="https://files.wri.org/d8/s3fs-public/styles/1260_wide/s3/uploads/clean-energy-02_2.png?VersionId=Ram0LyR8XtgvG1SaZUaTBPPDLz1lFIC1&amp;tok=8ayEPOQ_">https://files.wri.org/d8/s3fs-public/styles/1260_wide/s3/uploads/clean-energy-02_2.png?VersionId=Ram0LyR8XtgvG1SaZUaTBPPDLz1lFIC1&amp;tok=8ayEPOQ_</a>)</p> <p>TVA falsely asserts that new technologies must be developed to achieve net zero emissions by 2050. There is broad consensus that all the necessary technology for accomplishing net zero emissions by 2035 exists. Yes, there will be better, more efficient, and less expensive technology developed as our existing technology is being deployed, but this is no excuse to not deploy what we know will accomplish the task now. Those better solutions that will emerge during the journey are no reason to postpone our departure down this necessary path. Solar and wind combined with storage are already less expensive than coal and nuclear, at least on par with natural gas, and still declining in cost. There is no cost penalty for implementing them on a larger and more ambitious schedule than what TVA outlines in its current plans. To the contrary, the cost risks reside in TVA's current insistence upon holding onto coal longer than needed and replacing it mostly with new natural gas and SMR nuclear plant. Recent analysis by the Union of Concerned Scientists show that proceeding to 100% renewable electricity by 2035 is the least cost option for the USA.</p> <p>Other electric utility industry leaders</p>	mixed	scoping	Joe	Schiller	

		<p>share the urgency of the scientists and the Biden administration. A recent report by the Carbon Free Technology Institute (Pages - default (carbonfreetech.org) outlines a pathway to carbon free electricity production by the early 2030s. The report is endorsed by The Edison Electric Institute, an investor- owned utility organization, The Clean Air Task Force, and many other corporate, environmental, and think tank organizations. Like the TVA they acknowledge the need for technological innovation to facilitate decarbonization, however, unlike the TVA they do not view this as an impediment to expeditious action now.</p> <p>People who have studied climate change and truly comprehend its implications want action, not distant promises. Global climate change is here now and getting worse by the day. Recent Heat waves and fires in the west are tangible illustrations that TVA dithers while the earth burns. The recent Southern Alliance for Clean Energy Solar in the Southeast Report documents explicitly how badly TVA lags all but two of its regional peer utilities in the implementation of renewable energy. Parents and grandparents want to be able to sleep at night secure in the knowledge that TVA is implementing effective actions necessary to provide their children and grandchildren a livable planet. They want to look their children and grandchildren in the eye and honestly assure them "Their future will be alright." TVA keeps talking about its need to provide stable, low-cost power. Please start talking about how TVA is leading the region and the country in taking the necessary steps to provide our children and grandchildren a safe planet with a stable climate.</p> <p>Joe Schiller, Emeritus Professor of Biology</p> <p>Sent from Mail for Windows 10</p>					
Jul 2, 2021	Public comment: Kingston Fossil Plant Closure, FR Doc. 2021-12693	<p>Dear Mr. Williams:</p> <p>I strongly agree with the TVA decision to close the Kingston Fossil Plant, given its age, the challenge of so many shutdown events every year and, especially, the large environmental damage from coal combustion. The toxic legacy from coal ash, for which, sadly, this plant became a symbol with the spill in 2008, is with us still, endangering our health through air and land and groundwater pollution.</p> <p>I am very glad that TVA will be closing these coal units, though the indicated maximum time frame for the planned closure – by 2033 – is too long.</p> <p>We are currently seeing, starkly again, in the heat-wave effects and deaths in the Pacific Northwest, the enormous damage which fossil-fuel burning is wrecking on the climate, thus imperiling our future. The TVA must use the coal-units-closure opportunity to adjust its electricity-generation system in direction of energy efficiency and lessening use, and future electricity generation from renewable, clean-energy sources.</p> <p>A month or so ago, the International Energy Agency declared that nations must stop approving new fossil projects immediately if we are to avoid the worst impacts of climate change.</p> <p>The TVA should not, therefore, as now suggested in the capacity-replacement alternatives (A) and (B), in the forthcoming Environmental Impact Statement, build natural-gas plants with associated pipelines. I urge, instead, maximum employment of solar-energy technology as in alternative (C), and/or wind-energy expansion or wind-power purchase, along with demand management, conservation and efficiency-relevant measures, and increased storage capability.</p> <p>TVA should lead the nation in transforming our energy system, as the urgent need to reign in climate change demands.</p> <p>As well, in accordance with President Biden's goal of a fully clean-energy electricity system by 2035, the EIS alternatives should be re-prioritized to not include new fossil fuels.</p> <p>Thank you for considering my comments.</p> <p>Sincerely,  <a href="#">Frances Lamberts, 113 Ridge Lane, Jonesborough, TN 37659</a></p>	mixed	scoping	Frances	Lamberts	37659
Jul 8, 2021	Now's the time to invest in solar	<p>We have the opportunity to invest in more sustainable energy options like solar power and potentially start to slow the effects of climate change. We're already seeing more powerful storms, higher wildfire risks, and heat domes. Choosing to invest in anything but the most sustainable option doesn't feel like much of a choice right now. I'm thrilled you're considering replacing the Kingston plant with more solar options, even if they aren't in our local area.</p>	neutral	scoping	Lena	Elizer	37830

Jul 10, 2021	Notice of Intent - Environmental Impact Statement for Kingston Fossil Plant Retirement	<p>July 10, 2021</p> <p>Chevales Williams, NEPA Compliance Specialist 1101 Market Street BRC 2C Chattanooga, TN. 37402</p> <p>RE: Notice of Intent - Environmental Impact Statement for Kingston Fossil Plant Retirement</p> <p>Dear Ms. Williams:</p> <p>Tennessee Interfaith Power &amp; Light (TIPL) is the state affiliate of a network of faith communities working across the United States, offering a spiritual response to climate change. Our mutual efforts will protect our climate through upholding the sacredness of life, defending those most vulnerable to the many impacts of climate change, and advocating for effective climate protection policies. Our mission is to spiritually respond to the challenges of the climate crisis through upholding the sacredness of all life, protecting vulnerable communities, and caring for the Earth. We manifest our spiritual values by reducing our carbon footprint within our daily lives, releasing the spiritual power of our faith communities, and advocating for transformative climate protection and justice policies.</p> <p>TIPL offers the following comments on the Notice of Intent - Environmental Impact Statement for Kingston Fossil Plant Retirement:</p> <p>1. We support TVA's intent to retire the Kingston Fossil Plant and to replace it with an alternative solution to generate power for the Kingston service area. We believe that this decision offers TVA an excellent opportunity to become a leader in the southeastern region in developing and promoting clean and renewable energy, especially solar generated power. The most recent report by Southern Alliance for Clean Energy on solar power in the southeast shows that TVA, while making some progress, continues to lag behind most of the southeast in terms of solar generation in 2020, and will continue to be below the southeast average in 2024. TVA can and should become a leader in the development of alternative clean energy. TVA's failure to provide this leadership makes our region less competitive in a world that is quickly taking on the challenges of climate change and establishing ambitious goals of dramatic reductions of carbon emissions. As the primary energy producer for the state of Tennessee, TVA must recognize its responsibility in helping the nation to reduce its carbon emissions.</p>	neutral	scoping	Greg	Wathen	37076
		<p>2. We appreciate the list of environmental issues that will be addressed in the EIS: emissions of greenhouse gases, fuel consumption, air quality, water quality and quantity, waste generation and disposal, land use, ecological, cultural resources, transportation, visual and noise, and socioeconomic impacts and environmental justice. These appear to be a comprehensive list of environmental issues to evaluate, and we support a thorough assessment of these issues. We also recommend that the assessment of greenhouse gas emissions consider how those emissions will impact climate change in the 21st century, and how those emissions will impact the nation's goal of reducing our carbon emissions by 50% by 2050.</p> <p>3. We also recommend that the EIS consideration of "socioeconomic impacts and environmental justice" include an assessment of impacts on jobs, and equitable access to clean renewable energy. It is our understanding that the solar energy power sector is one of the fastest growing energy sectors in the United States, and will continue to grow as solar energy projects become a normal way of generating clean renewable energy.</p> <p>4. We are concerned that the alternative to replace the Kingston Fossil Plant with a natural gas facility and pipeline will do little to reduce greenhouse gas emissions, will result in increased emissions of methane from pipeline leaks, will have adverse socioeconomic impacts, especially on vulnerable populations, and will not lead to an improved quality of life for the region's residents. Recent news events from other regions suggest that pipelines are becoming more and more unpopular with the American people, and litigation to get approval for a new or expanded pipeline service is likely to prove a long and expensive prospect. Also, a new or expanded pipeline will require approval by the Federal Energy Regulatory Commission (FERC), which could prove difficult during these times when pipelines have become so controversial.</p> <p>5. TVA in the past has suggested that increased distributed solar energy in the region would make it more difficult for TVA to maintain its electrical grid for the region's customers. We suggest, however, that other utilities have successfully been able to provide more opportunities for distributed solar energy while maintaining their grid systems. We recommend that TVA investigate solar energy systems from other successful utilities, and re-commit itself to providing the region's customers with clean, renewable energy, which will save costs for energy consumers, provide jobs, improve our quality of life, reduce emissions, and provide a strong and demonstrable answer to the challenges of climate change in the 21st century.</p> <p>Thank you for the opportunity to comment on this Notice of Intent.</p> <p>Sincerely, Greg Wathen on behalf of Tennessee Interfaith Power &amp; Light</p>					
Jul 11, 2021	Option C - Solar	TVA has an opportunity to lead the transition away from fossil fuels and toward 100% clean energy. Retiring the Kingston plant with its historic significant provides the opportunity to demonstrate to the public TVA's commitment by investing only in renewable energy and not in a bridge technology like natural gas. TVA has multiple existing natural gas plants and has a very small portion of its portfolio in solar. It would be a mistake to miss the opportunity to invest in solar.	neutral	scoping	Matthew	Semler	37209
Jul 11, 2021	Kingston Retirement--Solar and storage	<p>This is a wonderful opportunity for TVA to lead the transition away from fossil fuels.</p> <p>Replace with solar and storage (TVA has been a storage pioneer, and the options are expanding exponentially). If TVA chooses to replace this large-scale coal plant with gas, it will look laughably flatfooted and behind the times 10-15 years from now. The prices of renewable energy sources and storage continue to drop (and will be even lower by the time this construction takes place). Climate change is a real and present danger to everyone and everything on earth, and the weather of the last five years is just a hint of what is coming. TVA is large and powerful enough to make an impact on total CO2 output, and, more importantly, can help cause a wave of transition among utilities across the U.S. and beyond. This isn't political. It is about doing the right thing for our children and grandchildren as well as our natural environment. TVA has been a leader in the past. TVA should be a leader now.</p> <p>Lead!</p>	neutral	scoping	Jay	Montgomery	37027
Jul 12, 2021	Project Alternatives	I vote for Option C: Retirement of KIF and construction and operation of Solar and Storage Facilities primarily at alternate locations	neutral	scoping	Josh	Stewart	37027

Jul 12, 2021	Replace Kingston coal plant with a renewable energy plant	I strongly support replacing the Kingston coal plant with a renewable energy plant, such as solar power. TN already has many natural gas plants, and is well positioned to invest in the future, with renewable energy. As a physician, I know that this would be the best investment in the health of our citizens, as well as our planet.	neutral	scoping	Jessica	Rosen	37209
Jul 12, 2021	Solar	Now that we have the ability to obtain cost-competitive energy (getting cheaper every day) from the sun without CO2 emissions, it seems backwards-looking to build another natural gas plant (we already have a lot). I (and many of my friends) do not want our energy source to be contributing to a huge problem for ourselves and our children now that there are viable alternatives. We need solar. Not more gas.	neutral	scoping	Kelly	Montgomery	37027
Jul 12, 2021	Solar	Solar!	neutral	scoping	Owen	Montgomery	37027
Jul 12, 2021	Solar	We need solar. Not gas. Thank you.	neutral	scoping	Clara	Montgomery	37027
Jul 12, 2021	We want solar	Solar	neutral	scoping	Porter	Montgomery	37027
Jul 12, 2021	A clean replacement.	Move to clean energy and protect people in the process. The time of building new polluting infrastructure is over. As a lifelong Tennessee resident, I support only renewable energy, and no new fossil fuels. Thank you.	neutral	scoping	Jamie	Vessell	37923
Jul 13, 2021	Replace Kingston Fossil Plant with Solar	TVA should replace their coal plants with the best option for the health and future of the residents of the Tennessee Valley, solar energy. My father worked for the TVA for years and looks forward to TVA's complete abandonment of fossil fuels. Renewable options should be embraced now to reduce pollution, create jobs, and ensure a better future for Tennesseans. Become a leading example of America's switch to renewable energy for not only Tennessee, but the rest of the American people.	positive	scoping	Destiny	Matheson	37770
Jul 13, 2021	Kingston Fossil Plant Replacement	Please do not replace the Kingston Fossil Plant with natural gas or nuclear. East Tennessee needs cleaning energy and clean energy jobs to ensure a healthy future for everyone.	neutral	scoping	Lisa	Curtin	37921
Jul 14, 2021	Kingston Fossil Plant Retirement	We own waterfront property in Ladd Landing and thus were impacted by the coal ash spill. While we received compensation we were not made whole as our property is worth 1/2 of what we paid for it. We have come to accept that for what it is; however, as options are considered for replacement we would encourage strong consideration for the most environmentally friendly options. It also may be a nice fresh start to build any new facility in a different location. That might be a good PR move and help TVA move away from the stigma of the ash spill.  Thank you for the opportunity to give this small amount of input.  Sincerely,  Bill Pritchard	negative	scoping	William	Pritchard	37934
Jul 14, 2021	strongly support Alternative C	I strongly support Alternative C and switching to solar power.	neutral	scoping	Kelsey	McNew	37206
Jul 14, 2021	Comments for Kingston NEPA	The NEPA for the closure of the Kingston Fossil Plant must consider science-based carbon emission targets consistent with Executive Order 13990. Aspirational targets such as TVA currently uses are no longer acceptable and do not ensure TVA will achieve the required carbon emissions necessary to prevent environmental and social harm. TVA must consider that carbon emissions produced by TVA contribute to global carbon dioxide levels in the atmosphere resulting in global impacts that are already being observed. A cost of carbon, such as the Biden administration's value of \$51 per ton, including effects outside of the US must be used. These global impacts are much greater than local impacts currently considered. TVA's selected option must achieve net zero carbon emissions the hard deadline of by 2035.  TVA should consider that the addition of carbon capture to any implemented combined cycle or gas turbine plants can only increase the costs of these plants and as a result increase the cost to customers receiving TVA power. Carbon capture requires capital spending on each plant and construction of infrastructure for the sequestration of any captured carbon. Operation of carbon capture requires the consumption of additional energy that must then be produced in addition, the operation requires significant labor costs. Utilization of captured carbon for enhanced oil extraction or other analogous use should not count toward carbon reductions. In the context of decreasing solar and storage costs, investments in and implementation of gas generating assets is not cost effective and will be stranded as renewable costs continue to decline. Implementation of gas with or without carbon capture will saddle valley customers, residential and commercial, with additional costs resulting in loss of competitiveness. Now is the time to figure out how to implement storage to ensure a robust and reliable electrical delivery system. This system should include significant distributed energy resources.	neutral	scoping	Dan	Firth	37664
Jul 14, 2021	Replace Kingston Coal Plant with Solar and Energy Storage	I support TVA's decision to retire the Kingston Coal Plant. However, replacing the plant with natural gas will in the long run create a stranded asset for TVA ratepayers. This is because the plant would have to be retired shortly in order to meet a goal of carbon free energy by 2050. And this would assume that further government regulation does not pass. Additionally, the proposal for natural gas requires construction of new natural gas pipelines. Over the years, opposition to pipelines has ended the Keystone Pipeline and Atlantic Coast Pipelines. This will pose an additional risk to supply of natural gas. It should also be noted that natural gas prices are unlikely to become cheaper over time while solar and energy storage continue to become more cost effective each year. Therefore, option C and/or consideration of a 100% replacement with renewables will continue to become a more attractive option as well as less likely to create a stranded asset.  It should also further be noted that the climate effect of switching from coal to natural gas is not nearly as beneficial as switching to solar and energy. This is due to methane leakage throughout the process of producing and transporting natural gas added to the CO2 emissions. Methane is considered by the EPA to be 25 times more heat trapping than CO2. Therefore, the Kingston coal plant should not be replaced with natural gas but rather renewables.	neutral	scoping	Hirak	Pati	29369

Jul 15, 2021	Scoping Comments for 2021 Environmental Impact Statement on Kingston Fossil Plant Retirement	<p>On behalf of the Center for Biological Diversity ("Center"), we submit these scoping comments on the Tennessee Valley Authority's ("TVA") Notice of Intent to prepare an Environmental Impact Statement ("EIS") for the retirement of the Kingston Fossil Plant ("Kingston Plant"). We appreciate the opportunity to provide these comments on issues including the need for TVA to include a project alternative for the safe retirement of all Kingston Plant facilities much sooner than the proposed 2033 timeline without complete replacement by another energy source. Under the proposed scoping and its most recent Integrated Resource Plan ("IRP"), TVA assumes a high-growth forecast that would necessitate a complete replacement of Kingston's lost energy generation. However, given ongoing and already planned energy development, we are concerned that TVA is overcompensating for the agency's assumed energy demand.</p> <p>Even more, with priority on new gas development, TVA is not only locking in fossil fuels for decades to come but contributing to even higher emissions through unnecessary additional fossil energy development. Indeed, a recent decision by the South Carolina Public Service Commission rejecting Duke Energy's proposed IRP is instructive regarding the analysis TVA must undertake here. In that proceeding, South Carolina regulators emphasized the importance and value of evaluating future energy demand rather than assuming consistently high-growth forecasts. In particular, Duke's proposed IRP forecasted a more than 1% annual growth rate through 2035, and Duke relied on this forecast to justify new generation resources with priority on Combined Cycle Combustion Turbine ("CC") and Simple Cycle Combustion Turbine ("CT") gas plants. However, within the last decade residential demand has instead remained stagnant, calling into question the need to develop new generation resources.</p> <p>Applying that reasoning here, it is apparent that TVA cannot proceed with its EIS on the assumption that the generation lost from closing the Kingston Plant needs to be replaced. Rather, TVA needs to consider the extent to which – either as a result of affirmative TVA actions, changes in demands and markets, or some combination of both – demand for centralized TVA power may decline in coming years, making replacement of this generation unnecessary, in whole or in part.</p> <p>We applaud TVA's decision to retire the Kingston Plant and encourage TVA to rapidly pursue retiring its other remaining coal plants. In doing so, TVA may not assume high-growth forecasts warrant centralized generation project alternatives. Thus, in all these analyses TVA must add a critical action alternative: accounting for declining demand, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.</p> <p>At present TVA only intends to consider three action alternatives for the Kingston Plant's retirement, only one of which would replace the coal plant with renewable energy. The other two alternatives prioritize CC and CT gas plants. Both of these energy options fail to address the most pressing issue today: the urgent need for a rapid transition away from all fossil fuels toward a renewable and just energy economy in order to avoid the worst impacts of the climate emergency and address the disproportionate harm experienced by environmental justice communities from the fossil fuel economy. Given the most recent climate change science and the significant climate change harms already occurring in TVA's territory, TVA must consider alternatives that would have the agency do its requisite part to advance this necessary energy transition.</p> <p>Furthermore, given the Kingston Plant's legacy as the site of the country's largest industrial spill, TVA must also prioritize immediate remediation and adequate clean-up of the Kingston site. Retiring the Kingston Plant cannot be divorced from comprehensive action to address the harms done to communities in the Tennessee Valley – especially the Kingston coal ash workers – and the environment as a result of the 2008 coal ash spill. TVA must</p>	neutral	scoping	Gaby	Sarri-Tobar	
		<p>Moreover, earlier this year President Biden issued an Executive Order to transform the entire U.S. electricity sector to be carbon-free by 2035. He emphasized the Administration's policy "to organize and deploy the full capacity of its agencies to combat the climate crisis." As a federal agency and the country's largest public power provider, TVA must advance carbon-free electricity on a timeline consistent with climate science and the President's goal. The Kingston Plant EIS must therefore fully and fairly consider alternatives providing for the rapid retirement of the Plant and its replacement, to the extent necessary, with clean, renewable energy sources, including DER, storage and energy efficiency options, in order to comply with the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321, et seq.</p> <p>DISCUSSION</p> <p>A.TVA's Existing Alternatives For The Kingston Plant Retirement Fail To Achieve The Rapid Greenhouse Gas Reductions That Are Critical To Addressing The Climate Crisis, And The EIS Must Fully Address The GHG Impacts Of All Reasonable Alternatives.</p> <p>Given the climate crisis and the important role TVA plays as the nation's largest power provider, with massive GHG emissions, the Kingston EIS must center the replacement of the Kingston Plant with non-fossil fuel resources, including renewable energy and energy efficiency, to the extent replacement is necessary. At the moment, two of the three project alternatives consider CC and CT gas plants that would potentially contribute to, instead of reducing, TVA's already alarming GHG emissions through 2038. With increased reliance on gas as a replacement for coal, TVA would still generate more than 34 million tons of CO2 each year in 2038. This current emphasis on further gas expansion is simply unacceptable from the standpoint of what climate science and equity demand.</p> <p>In addition, while TVA currently intends to consider one alternative prioritizing solar and storage facilities, the EIS must also account for the declining need for centralized TVA generation, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.</p> <p>1.TVA must consider renewable energy alternatives aligned with a "path to zero emissions" that would also reduce energy demand.</p> <p>The purpose of NEPA is to identify reasonable alternatives to an agency's proposed action, and then expose and discuss the multitude of public health, environmental, socio-economic, wildlife, and other impacts of those alternatives. However, regardless of the ultimate decisions made, NEPA does not permit an agency to refuse to even consider reasonable alternatives. Accordingly, here TVA may not rely on contract terms or simple economic considerations to refuse to consider alternative scenarios for its power mix in the coming decades, including DER and storage alternatives.</p> <p>This is particularly true given that TVA acknowledges that its statutory mandate under the TVA Act requires that it be a "leader in technology innovation, low-cost power and environmental stewardship." TVA therefore should be looking for opportunities to invest in the renewable energy technologies that will help reduce electricity prices and make those technologies even more cost-competitive in the coming years.</p> <p>Recent research demonstrates that replacing fossil fuel resources with DER, storage, and energy efficiency could provide significant financial benefits. One analysis in particular modeled the cost-effectiveness and impact of DERs and other clean energy resources on the electricity system. Under the examined scenarios, significant investment in DER would result in cumulative system-wide savings of \$301 billion by 2050 compared to a business-as-</p>					



		<p>In addition to cost savings, DERs bring several additional benefits including grid management, demand response, and transmission benefits. TVA has expressed concern that alternatives prioritizing renewables like solar as replacements to Kingston are incapable of addressing peak demand. But as the Vibrant Clean Energy report demonstrates, DER can actually minimize peak demand by about 17 percent and also effectively shift demand to meet variable supply rather than forcing supply to meet demand.</p> <p>Additionally, distributed solar generation can provide benefits to communities and ecosystems including reduced water use, reduced land use, and even improved wildlife habitat, which are critically important to TVA's customers.</p> <p>Thus, TVA must consider a full range of renewable energy alternatives that would make replacement of TVA's coal power generation with other centralized energy systems, such as CC and CT gas plants, obsolete. TVA must compare the environmental impacts of investments that largely or completely rely on DER, storage and energy efficiency with the other options considered in the proposed EIS—including not only the cost of potential early retirement of fossil fuel resources and expansion of gas, but also the social cost of carbon associated with keeping them running for many years to come. Instead of investing in risky alternatives based on an assumption of increasing energy demand, TVA should lead the way in investing in climate-friendly and just energy solutions, like distributed solar generation, that would both reduce consumption and TVA's GHG emissions. Renewable energy and energy efficiency alternatives are proven technologies that not only make financial sense, and can lower power bills for TVA customers, but will advance TVA's path to decarbonization.</p> <p>In short, to meet its purpose of providing safe, clean, reliable, and affordable electricity to all its customers, TVA must add a critical action alternative accounting for declining demand for centralized TVA generation, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.</p> <p>2. TVA must meaningfully assess the impacts of greenhouse gas emissions by comparing impacts between the existing alternatives and one or more alternatives that chart a path to zero emissions.</p> <p>In other environmental reviews, TVA has refused to meaningfully consider its contributions to GHG emissions on the grounds that they are small relative to global emissions. This approach violates NEPA.</p> <p>It is well-established that NEPA requires a robust consideration of the impacts of a project's GHG emissions in terms of its relationship to climate change. Thus, although some "speculation is . . . implicit in NEPA," agencies may not "shirk their responsibilities under NEPA by labeling any and all discussion of future environmental effects as crystal ball inquiry."</p> <p>Thus, TVA must add the necessary alternative(s) discussed above that will advance its rapid transition to zero emissions, all the while considering—and informing the public about—the likely environmental outcomes under the different alternatives. In particular, under two of the currently considered alternatives, which propose gas replacements, TVA will continue to be one of the largest contributors to the GHGs that are fueling the climate crisis, and thus will continue to be responsible for the devastating impacts that are certain to come in the country and around the world as we continue to increase the concentrations of GHGs in the atmosphere.</p>					
		<p>Alternatively, under a renewable energy alternative that maximizes DER, storage, and energy efficiency, and which would reduce demand for centralized and fossil fuel TVA power, TVA would not only carry out its requisite part in phasing out fossil fuels and lowering GHG emissions, but also in addressing environmental justice concerns associated with a reliance on false solutions like fossil gas.</p> <p>***</p> <p>The urgency of the climate and energy crises demand that large utilities, especially TVA, step up and meet the moment. It is now on power providers to not only rapidly phase out their fossil fuel fleets but to replace that energy with genuinely renewable energy sources and energy efficiency. With the Kingston Plant retirement, TVA has an opportunity to be a model this country needs for what a just and truly renewable energy transition should look like. TVA can and should lay the groundwork for the very technological solutions that other utilities can deploy to meet President Biden's decarbonization goal. We look forward to commenting on a Draft EIS for the Kingston Plant that fully addresses these concerns. In the meantime, please contact us should there be any further information we can provide.</p> <p>□</p> <p>Sincerely yours,</p> <p>CENTER FOR BIOLOGICAL DIVERSITY</p>					
Jul 15, 2021	Kingston Fossil Plant and the construction and operation of facilities to replace the retired generation	<p>I write on behalf of Tennessee Citizens for Wilderness Planning, an Oak Ridge-based, not-for profit, environmental advocacy organization with members across the state. Since 1966, TCWP has taken a protective stance regarding the Obed River watershed. Portions of the watershed are protected by inclusion in the Obed National Wild and Scenic River, a designation TCWP worked toward decades ago.</p> <p>As the alternatives for the proposed retirement of the nine coal-fired units at the Kingston Fossil Plant and the construction and operation of facilities to replace the retired generation are developed, great care must be taken with the placement of any pipelines. The specific routes for the proposed outlines should be stated in detail and marked on readable maps.</p> <p>Thanks for this opportunity to comment</p>	neutral	scoping	Sandra	Goss	37919-8225

Jul 15, 2021	Kingston Coal Plant Closure	<p>These comments are a follow up to my previously submitted comments. TVA's recent decisions to consider closing its coal-fired steam plants, including Kingston, is a welcome, though overdo, change of position. However, it seems TVA favors replacing these coal-fired plants with natural gas plants. The TVA's environmental assessment (EA) of the Kingston Coal plant includes 3 alternatives, two of which are gas fired power plants, and one that is a combination of solar and storage. The TVA published NEPA timeline indicates the NEPA process will not be completed before late 2023. Thus, the start of two of the alternative projects, alternative A, a combined cycle combustion turbine (CC) gas plant on the KIF reservation or alternative B, a simple combustion turbine at a yet to be determined location, would likely not begin before early 2024. Since alternative A requires construction of a new natural gas pipeline, which in turn requires completion of another NEPA process along with FERC approval which could only begin after a decision to proceed with alternative A is chosen, this alternative would not begin operation at least a couple years subsequent to 2024. This raises many questions.</p> <p>First, given that solar and storage is already cost effective and still decreasing relative to gas, why does TVA keep pursuing costly natural gas options that cannot come online for several years, while deferring solar deployments which could begin immediately and proceed in stages as needed. Second, why pursue fossil fuel technologies that slow the TVA's stated goal to decarbonize their power generating system. Current science indicates life cycle emissions of gas plants are close to that of coal when methane leaks from drilling and transporting are considered. It is widely assumed, FERC is likely going to incorporate greenhouse gas emissions into their deliberations regarding pipeline approvals, and alternative A will require a new pipeline approval. Similarly, numerous federal court rulings have mandated that cumulative climate impacts be included in NEPA processes. This means both alternative A and alternative B must include climate change impacts. TVA does not seem to think it must include the drilling and transport methane emissions in this process because it will not own and operate the new proposed gas pipeline of alternative A but there is no reason to construct the proposed pipeline but to serve a CC gas plant on the KIF.</p> <p>A possible answer to these questions may be indicated by statements made by Scott Brooks with TVA's office of Public Relations in an interview with the Clarksville Leaf Chronicle reporter Jimmy Settle on 6 July 2021 regard to the closure of the Cumberland Steam Plant. The EA for the Cumberland steam plant includes the same three alternatives as the EA for the Kingston steam plant. In that interview Mr. Brooks indicated that TVA considers TVA a less expensive alternative to coal and that it allows more renewable energy to be deployed later. However, he also indicated that constructing natural gas plants now will allow time for better carbon capture technology to be developed. Thus, TVA's reasoning seems to be "we will emit more greenhouse gasses until the mid-2030's so that we can begin capturing them and sequestering them with a yet to be proven technology that will increase the cost of electricity generation with gas to even more than it will cost above that of current solar plus storage." Needless to say, this is an absurd position.</p>	negative	scoping	Joe	Schiller	37040
		<p>Other public statements by TVA Director Jeff Lyash indicate TVA views inverter based technology options insufficient to provide grid stability. This position is contradicted by several facts. One fact is that several utilities in the USA already have much higher penetrations of inverter-based power on their systems without these alleged instability issues. Also, TVA has several nuclear plants and a number of hydro turbines that can provide this function. Further, TVA is not projecting closure of any additional coal plants for at least a couple years. While TVA has no problem counting on technology developments in the case of carbon capture and sequestration, they refuse to admit that technology advances in storage and grid stabilization will occur over the same time frame. Lastly, there are already several such technologies commercially available, but TVA seems reluctant to acknowledge their existence. Some of these technologies could be deployed at the KIF, utilizing existing plant infrastructure while providing some employment opportunities to current TVA employees that will otherwise disappear.</p> <p>TVA talks of implementing lower carbon emission technologies; however, to achieve net zero carbon (even by 2050) TVA needs to be implementing zero emissions technologies now. The current scientific consensus is that carbon emissions must end this decade, not three decades from now. President Biden's climate policies acknowledge this scientific consensus and seek to eliminate carbon emissions by 2035. Thus, the TVA's goals of achieving net zero emissions by 2050 are a decade and a half insufficient. The TVA cannot achieve net zero emissions, even by 2050, by building new carbon emitting natural gas plants today. Currently 15 electric utilities have committed to producing 100% carbon free electricity and the majority of those have adopted more aggressive schedules than the TVA (<a href="https://files.wri.org/d8/s3fs-public/styles/1260_wide/s3/uploads/clean-energy-02_2.png?VersionId=Ram0LyR8XtgvG1SaZUaTBPPDLz1F1C1&amp;itok=8ayEPOQ_">https://files.wri.org/d8/s3fs-public/styles/1260_wide/s3/uploads/clean-energy-02_2.png?VersionId=Ram0LyR8XtgvG1SaZUaTBPPDLz1F1C1&amp;itok=8ayEPOQ_</a>)</p>					
		<p>TVA falsely asserts that new technologies must be developed to achieve net zero emissions by 2050. There is broad consensus that all the necessary technology for accomplishing net zero emissions by 2035 exists. Yes, there will be better, more efficient, and less expensive technology developed as our existing technology is being deployed, but this is no excuse to not deploy what we know will accomplish the task now. Those better solutions that will emerge during the journey are no reason to postpone our departure down this necessary path. Solar and wind combined with storage are already less expensive than coal and nuclear, at least on par with natural gas, and still declining in cost. There is no cost penalty for implementing them on a larger and more ambitious schedule than what TVA outlines in its current plans. To the contrary, the cost risks reside in TVA's current insistence upon holding onto coal longer than needed and replacing it mostly with new natural gas and SMR nuclear plant. Recent analysis by the Union of Concerned Scientists show that proceeding to 100% renewable electricity by 2035 is the least cost option for the USA.</p> <p>Other electric utility industry leaders share the urgency of the scientists and the Biden administration. A recent report by the Carbon Free Technology Institute (Pages - default (carbonfreetech.org) outlines a pathway to carbon free electricity production by the early 2030s. The report is endorsed by The Edison Electric Institute, an investor- owned utility organization, The Clean Air Task Force, and many other corporate,</p>					
		<p>environmental, and think tank organizations. Like the TVA they acknowledge the need for technological innovation to facilitate decarbonization, however, unlike the TVA they do not view this as an impediment to expeditious action now.</p> <p>People who have studied climate change and truly comprehend its implications want action, not distant promises. Global climate change is here now and getting worse by the day. Recent Heat waves and fires in the west are tangible illustrations that TVA dithers while the earth burns. The recent Southern Alliance for Clean Energy Solar in the Southeast Report documents explicitly how badly TVA lags all but two of its regional peer utilities in the implementation of renewable energy. Parents and grandparents want to be able to sleep at night secure in the knowledge that TVA is implementing effective actions necessary to provide their children and grandchildren a livable planet. They want to look their children and grandchildren in the eye and honestly assure them "Their future will be alright." TVA keeps talking about its need to provide stable, low-cost power. Please start talking about how TVA is leading the region and the country in taking the necessary steps to provide our children and grandchildren a safe planet with a stable climate.</p>					

Jul 7, 2021	Comments re : Kingston Coal Fired Plant EIS Options; 6/29/21 Hearing	<p>I appreciate the opportunity to comment on the TVA Kingston Coal Fired Plant retirement EIS.</p> <p>I am a retired environmental analytical chemist and am very familiar with coal combustion residue ( CCR) concerns , emissions , ambient air quality parameters and control measures at CF IndustrialPP. My employer, Eastman Chemical, has burned about 10 million lbs of SWVA coal daily.</p> <p>CCR is a toxic material. EPA failed to properly designate it as such , However, it clearly is hazardous and the drastic environmental and human results from the Kingston spill clearly demonstrated that.</p> <p>Therefore, to even consider to operate Kngston on coal is unacceptable as it continues to produce CCR and impound it on site; thus compounding the situation. Additionally, the uncontrolled CO/CO2 and NOX emissions would be counter to the Biden emission reduction goals, These Goals are important parts of remediation of the Climate Crisis.</p> <p>The two NG fired options are stated to reduce present CF CO2 emissions up to 50%. I note that the third, Solar option provides 100% . Further, the NG options fail to include the massive external environmental impacts related to the extraction ( hydrofracking ), transport and the continued CO2 emissions from NG combustion.</p> <p>The NG fueled options simply create stranded cost as NG will ultimately become replaced by sustainable energy sources, TVA, conversely should be forward- focused and support renewable SOLAR at Kingston and the other dispersed locations, Why not lead in renewables ?</p> <p>TVA further states that the Kingston site will be converted to a developable " brown site ". This will involve stabilizing or removal of the millions of tons of CCR ! How this is to be accomplished is unknown and unstated. The work necessary to create a developable site will provide needed jobs for local displaced TVA employees, HOWEVER, they MUST be properly protected and compensated.</p> <p>In conclusion : I support the immediate retirement of the coal fired Kingston Plant and the transition to non carbon means of power generation.</p>	neutral	scoping	Rick	Phelps	
		<p>TVA must support remediation of the Global Climate Crisis by moving to Solar-storage non-carbon combustion energy.</p> <p>Finally, the retirement of the Kingston plant must recognize and remediate the economic impacts created on its workers !</p> <p>Richard C Phelps 1127 Potter Blvd Tullahoma, Tn 37388 931 222 0367 Citizens Climate Lobby, Sierra Club Consulting Chemist</p>					
Jul 8, 2021	For Kingston Fossil Plant replacement, consider more options through Kairos Power perfect location & local SME support team	<p>Marty Gamble, PSP Project Controls Analyst DOE Office: 865-241-1122 Cell: 865-806-0834 Email: marty.gamble@orem.doe.gov Email: gamblem@p2s.com</p>	neutral	scoping	Marty	Gamble	
Jul 8, 2021	Kingston coal Ash plant	<p>My response and opinion to this is leave it alone!!! stop messing with things that aren't broken. People are working they're making a living in an earning a paycheck they're supporting their families. Why would you want to disrupt that unless you have a private agenda of your own. Don't cross and burn Bridges with people in today's society it's dysfunctional enough. The last thing we need is more people depressed, angry, kids needing food stamps because there's no food in the house, because the parents can't earn a paycheck. Its ridiculous to even think of. It's selfish. Quit acting like a Biden lover and a Hillary lover and just stop.</p> <p>Life is hard enough we don't need you to add to it.</p>	negative	scoping	Julia	Clark	

Jul 8, 2021	RE: Kingston Fossil Plant Retirement	<p>I am writing to you today as a member of the Tennessee State Senate representing Roane county and six counties located adjacent to or nearby the Kingston Fossil Plant. The Kingston Plant has served the citizens of this region well by providing responsible service since 1955 and has received commendations for its efficiency over the years. The notice of intent suggests three alternative actions. Most important is that whatever alternative is chosen, it must provide uninterruptible electrical service for twenty-four hours a day, 365 days a year. Many of the new technologies on the market today are fraught with intermittency; that is, they do not operate if certain weather conditions are not present. If these technologies are chosen to power our future electric system, we also must pay to have extensive battery back-up systems or other plants in place to deal with the intermittency issues. While battery systems are gaining efficiency and effectiveness, they are not yet ready to provide lasting support to a community in the event of a major, and extensive, long-term outage. The scope of TVA's environmental impact statement (EIS) includes an acceptable option to continue to operate the Kingston Plant with regulatory updates. It is unfortunate that those regulatory updates as well of the addition of the scrubber system in 2008 could not have been made earlier so that the plant, and the jobs associated with it, could continue operation at the same location in the future. Please seriously consider continued operation. If the Kingston Plant cannot be updated and continue operation, an acceptable solution is alternative "A", the development and operation of a Combined Cycle Combustion Turbine Gas Plant at the same site. Regarding option "B", it is important for our citizens to have affordable, reliable, resilient, sustainable energy technologies that are close to the people who rely on them.</p> <p>Importing energy from other states and long distances is less reliable and not an option that we will support. Option "C," the retirement of Kingston replaced by solar and storage facilities at alternate locations is acceptable only if the storage facilities can sustain our service territory over a period of at least five days during a snowstorm or other transformational weather event. Under some of these options it may prove necessary to build natural gas pipelines and invest in transmission upgrades. We will support those measures if required. We appreciate that the scoping process, integral to implementing the National Environmental Policy Act, will provide for a thorough and balanced Environmental Impact Statement, fair and just in its record of decision. We welcome the opportunity to comment on the draft EIS when it is made available, since we are the parties most at risk in this decision-making process. Thank you for the opportunity to provide these comments. Sincerely,</p> <p>Ken Yager Senator</p>	neutral	scoping	Ken	Yager	
Jul 13, 2021	NPS Comments, ER-21/0237: Kingston Fossil Plant Retirement Project	<p>Interior Region 2 • South Atlantic–Gulf Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands Chevales Williams NEPA Compliance Specialist 1101 Market Street, BRC 2C Chattanooga, TN 37402 Dear Ms. Williams:</p> <p>The National Park Service (NPS) has reviewed the Tennessee Valley Authority (TVA) notice of intent (NOI) to prepare an environmental impact statement (EIS) in accordance with the National Environmental Policy Act (NEPA) to assess the impacts associated with the proposed retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF) located in Harriman, Roane County, Tennessee, and the construction and operation of facilities to replace part of the retired KIF generation.</p> <p>The NOI requests comments concerning the scope of the EIS, alternatives being considered, and environmental issues that should be addressed in the EIS and any data, information, and analysis relevant to the proposed action from federal agencies, including the NPS. In addition to the no action alternative (continuing to operate KIF), TVA plans to consider three action alternatives in the EIS:</p> <p>A. Retirement of KIF and construction and operation of a combined cycle combustion turbine (CC) gas plant at the KIF reservation, which would require construction of a roughly 125 mile long natural gas pipeline, that would, to the extent practicable, be located within or adjacent to the existing East Tennessee Natural Gas Pipeline right of way;</p> <p>B. Retirement of KIF and construction and operation of simple cycle combustion turbine (CT) gas plants at alternate locations in Gallatin, Johnsonville, Gleason, or Lagoon Creek, Tennessee, and/or Southaven or Kemper, Mississippi; and</p> <p>C. Retirement of KIF and construction and operation of solar and storage facilities, primarily at alternate locations to be determined in Northeast Tennessee.</p> <p>Connected actions, such as the natural gas pipeline associated with the CC</p>	neutral	scoping	Haigler	Pate	

		<p>plant and transmission upgrades, will also be considered in the EIS. However, it is difficult to understand the full scope of the proposed project areas from the project location descriptions provided in the NOI and other information on TVA's project website. Additional information regarding associated infrastructure development, such as transmission upgrades and roads, was not</p> <p>United States Department of the Interior NATIONAL PARK SERVICE Atlanta Federal Center 1924 Building 100 Alabama Street, SW Atlanta, GA 30303 IN REPLY REFER TO: 1.A.2 (SERO-PC) 2</p> <p>included in the NOI or the project website. Finally, the distributed nature of Alternative C, which includes many (20+) solar and storage facilities within Northeast Tennessee at locations to be determined, makes it difficult to understand the potential effects of these facilities.</p> <p>We request cooperating agency status under NEPA for this proposal because there are areas under NPS jurisdiction or areas of expertise that are within the area of potential affect. Potential impacts to these resources and potential mitigation, as necessary, will need to be addressed in the EIS. Designation as a cooperating agency does not preclude NPS' independent review and comment responsibilities, or preclude our responsibilities for any other environmental consultations required by law. Similarly, our being a cooperating agency would not imply that the NPS would necessarily concur with all aspects of TVA's findings. We offer the following scoping comments for consideration in the EIS:</p> <p>National Park System/Wild and Scenic Rivers Obed Wild and Scenic River (OBED) is a unit of the National Park System and the National Wild and Scenic River System. The NPS does not have authority to grant a right of way permit across OBED lands for the purpose of a natural gas pipeline. The pipeline would need to avoid federal lands within the OBED</p>					
		<p>boundary as a result.</p> <p>However, Section 7 of the Wild and Scenic Rivers Act could apply to stream crossings outside of the designated reaches of the Obed River, Emory River, Clear Creek, and Daddys Creek at OBED beyond its boundary, and a determination by the NPS under Section 7 may be required for this project. Section 7 requires NPS to evaluate federally-assisted water resource developments "below or above a wild, scenic or recreational river area or on any stream tributary" that have the potential to "invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values."</p> <p>The potential crossings of the Emory River and Campground Creek by the East Tennessee Natural Gas Pipeline in Alternative A are upstream and near the designated reach of the Emory River. The existing pipeline crossing of Susan Branch is similarly situated upstream and near Milligan Branch and the designated reach of the Obed River, and the same pipeline crosses many tributaries upstream and near the designated reach of Clear Creek, including Gut Branch, Little Clear Creek, Gordon Branch, Green Branch, Douglas Branch, White Creek, Little Creek, Four Mile Creek, and Bice Creek.</p> <p>Geospatial data for the administrative boundaries of National Park System Units can be located at the following link: <a href="https://irma.nps.gov/DataStore/Reference/Profile/2225713">https://irma.nps.gov/DataStore/Reference/Profile/2225713</a> More information and geospatial data for Obed Wild and Scenic River can be located at the following link: <a href="https://rivers.gov/rivers/Obed.php">https://rivers.gov/rivers/Obed.php</a> Land and Water Conservation Fund NPS' Land and Water Conservation Fund (LWCF) State and Local Assistance Program provides matching grants to states and local governments for the acquisition and development of public outdoor recreation areas and facilities. In a letter dated June 22, 2021, the Tennessee Department of Environment and Conservation Recreation Resource Division indicated to NPS that "with the</p> <p>3</p> <p>limited local data from the information presented from TVA on all options, it</p>					

		<p>cannot be determined exactly what [LWCF Act] Section 6(f)(3) protected land will be impacted. We do feel that based on the information from TVA, multiple Section 6(f)(3) protected parcels could be impacted by any of the options presented. Additional data on the local level will be needed to determine what, if any, Section 6(f)(3) protected land is impacted."</p> <p>Cummins Falls State Park could be affected by the natural gas pipeline that is part of Alternative A and is a LWCF-assisted site. NPS also analyzed potential impacts to LWCF-assisted sites in the counties containing Alternative B potential locations in Tennessee and Mississippi. In Tennessee, there are eighteen LWCF projects in Sumner County (Gallatin), eleven LWCF projects in Weakley County (Gleason), two LWCF projects in Humphreys County (Johnsonville), and one LWCF project in Haywood County (Lagoon Creek). In Mississippi, there are three LWCF projects in Kemper County (Kemper) and none in De Soto County (Southaven).</p> <p>Impacts to any LWCF-assisted site(s) by any of the project alternatives would likely constitute an LWCF conversion that must be approved by the NPS. "No property acquired or developed with assistance under this section shall, without the approval of the Secretary, be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location." LWCF Manual, Chapter 8 (36 C.F.R. 59.3)</p> <p>Nationwide Rivers Inventory</p> <p>Clear Creek, Crooked Fork Creek, the Emory River, White Creek, Spring Creek, the Blackburn Fork of the Roaring River, Flynn Creek, and Goose Creek are listed on the Nationwide Rivers Inventory (NRI) administered by the NPS, and they could be crossed by the Tennessee Ridgeline</p>					
		<p>pipeline that is part of Alternative A. NRI river segments are potential candidates for inclusion in the National Wild and Scenic River System. Under the Wild and Scenic Rivers Act section 5(d)(1) and related guidance, all federal agencies must seek to avoid or mitigate actions that would adversely affect one or more NRI segments.</p> <p>Geospatial data for the NRI can be located at the following link:  <a href="https://irma.nps.gov/DataStore/Reference/Profile/2233706">https://irma.nps.gov/DataStore/Reference/Profile/2233706</a>.</p> <p>National Historic Trails</p> <p>Johnsonville, TN, one of the Alternative B Preliminary CT Sites, is within one mile of the Water Route of the Trails of Tears National Historic Trail (NHT) and within 1.5 miles of the Bengé Route of the Trail of Tears NHT. The Reynoldsburg Ferry Site within the community of Johnsonville is a high potential site associated with the Trail of Tears NHT. A high potential site is defined in the National Trails System Act as, "those historic sites related to the route, or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use" (P.L. 90-543, as amended through P.L. 116-9, March 12, 2019).</p> <p>4</p> <p>The geospatial data for the designated alignment of the Trail of Tears National Historic Trail can be located at the following link:  <a href="https://irma.nps.gov/DataStore/Reference/Profile/2238914">https://irma.nps.gov/DataStore/Reference/Profile/2238914</a>.</p> <p>National Register of Historic Places</p> <p>The Officer Farmstead, Fort Blount-Williamsburg Site, and Averitt-Herod House are all National Register (NR)-listed properties that could be affected by the natural gas pipeline that is part of Alternative A. Many other NR-listed properties exist within the areas potentially affected by the project. TVA should complete the required steps under National Historic Preservation Act (NHPA) Section 106 in its analysis for the project, in particular, the identification of historic properties. We also may find upon further review that it would be appropriate for the NPS to be a consulting party under NHPA.</p>					
		<p>National Heritage Areas</p> <p>The project is within the Tennessee Civil War National Heritage Area.</p> <p>We look forward to continued collaboration with TVA on this project. Please let us know if we can supply you with copies of the congressionally-designated alignment of the NHT, or any other information for use in your analysis. Please direct questions to Dusty Pate, Energy Specialist, at 404-772-0637, or <a href="mailto:haigler_pate@nps.gov">haigler_pate@nps.gov</a></p> <p>Sincerely,  Pedro M. Ramos  Acting Regional Director</p> <p>cc: Niki Nicholas, Superintendent, Obed Wild and Scenic River  Ms. Katherine Blount, Mississippi Department of Archives &amp; History  Mr. Patrick McIntyre, Jr., Tennessee Historical Commission  Dr. Carrol Van West, Center for Historic Preservation, Middle Tennessee State University</p>					

Jul 15, 2021	TVA	<p>To TVA: NEPA Compliance Specialist, Chevales Williams, Chattanooga, Reference : FR 2021-12693. I was glad to learn that TVA decided to lower its emission of CO2 by replacing the Kingston plants coal with natural gas. It would be even better if TVA used more renewable resources like Solar and wind power, especially considering the likelihood of climate disasters. Because avoiding carbon emissions for my electricity was very important to me I installed a solar panels system on my house many years ago. This is what TVA should do, now that the aged Kingston plants operation has become uneconomical. We are in severe climate crisis and TVA should not plan to continue the use of fossil-fuel based electricity generation.</p> <p>I urge you to change the announced plan. Please use this opportunity to emphasize renewables and energy-saving approaches.</p> <p>Ignacy Fonberg 316 S. Cherokee St. Jonesborough TN 423-753-5677</p>	neutral	scoping	Ignacy	Fonberg	
Jul 14, 2021	TDEC Comment on TVA's NOI to Prepare an EIS for the Retirement of the KIF	<p>July 14, 2021 Via Electronic Mail to nepa@tva.gov Attn: Chevales Williams, NEPA Specialist 1101 Market Street, BRC 2C Chattanooga, TN 37402 Tel: 423-751-7316 Email: cwilliams1@tva.gov Dear Ms. Williams:</p> <p>The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority's (TVA) Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF). The NOI also describes planned construction and operation activities for facilities to replace the retired generation from KIF of approximately 1,450 MW. There are three alternatives described in the NOI: 1) Retirement of KIF and construction of a Combined Cycle Combustion Turbine Gas Plant at the same location; 2) Retirement of KIF, investment in local and regional transmission, and construction and operation of Simple Cycle Combustion Turbine (CT) Gas Plants at different locations; and 3) Retirement of KIF and construction and operation of Solar and Storage Facilities, mostly at other locations. TDEC has reviewed the NOI and offers the following comments regarding activities subject to its purview or related to its subject matter expertise. TDEC acknowledges that there is limited detail available in the NOI and plans to submit additional, detailed comments on planned activities upon release of a Draft EIS. TDEC also encourages the TVA to consult with relevant local parties for actions which might be subject to local agency approval.</p> <p>Air Pollution Control</p> <p>Activities described in the NOI include demolition and renovation of structures. There are federal and state regulations in place regarding asbestos renovation and demolition activity that are enforced by the U.S. Environmental Protection Agency and TDEC's Division of Air Pollution Control, respectively. These regulations apply to any building or structure known to contain asbestos or to any buildings proposed to be renovated or demolished. When any structures are proposed to be renovated or demolished, an asbestos demolition notification must be provided in advance and proper pre-demolition surveys must be conducted to identify any regulated asbestos containing material (ACM) present.</p>	neutral	scoping	Jennifer	Tribble	
		<p>Prior to any demolition or renovation, all facilities must be examined for ACM and all potential ACM in the buildings proposed for renovation or demolition must be handled and disposed of according to the applicable federal, state, and local regulations. TDEC requests that these considerations be reflected in the Draft EIS.</p> <p>Dust emissions generated by demolition and renovation activities can vary substantially depending on the levels of activity, specific operations, and prevailing meteorological conditions. These emissions are likely to be short term and temporary in nature. TDEC recommends that ordinary dust control measures be employed to mitigate any dust emissions generated. These measures may include using water spray to wet areas likely to generate fugitive dust during on-site construction activities as needed. TDEC also notes that fugitive dust may be generated by activities described in the NOI and points the TVA to review specific requirements<sup>1</sup> to prevent fugitive dust, including use, where possible, of asphalt, water, or suitable chemicals to limit its creation. TDEC requests that these considerations be reflected in the Draft EIS.</p> <p>For any site-clearing activities that occur, TDEC recommends disposal methods other than open burning if found to be practical. TDEC notes that no expressly prohibited materials<sup>2</sup> may be burned. Additionally, TDEC recommends employment of good smoke management practice if any open burning activities occur. TDEC requests that these considerations be reflected in the Draft EIS.</p> <p>TDEC suggests that the TVA consider the use of idle restrictions for heavy construction equipment and dump trucks in use on-site to minimize emissions from these activities. TDEC also recommends that all construction equipment employed on-site be well maintained and equipped with the latest emissions control equipment. TDEC requests that these considerations be reflected in the Draft EIS.</p> <p>For any new air pollution sources that will be built as a result of these activities, TVA is required<sup>3</sup> to submit an application for a construction permit not less than 90 days prior to the estimated start date of construction for minor new source review and not less than 120 days prior to the estimated start date of construction for a new source review. TDEC requests that these considerations be reflected in the</p>					

		<p>Draft EIS.</p> <p>Cultural and Natural Resources</p> <p>Based on the information provided in the NOI, TDEC finds that no significant archaeological resources will be disturbed because of the planned activities. The retirement of the KIF will not adversely affect cultural resources. However, any additional construction associated with potential alternatives could disturb archaeological resources and implementation of the proposed alternatives should be coordinated in consultation with the State Historic Preservation Office (SHPO). TDEC requests that these considerations be reflected in the Draft EIS.</p> <p>Water Resources</p> <p>TDEC notes that the TVA will need individual construction stormwater permits under the National Pollutant Discharge Elimination System (NPDES) permit program. TDEC also notes that the TVA will need individual Aquatic Resource Alteration Permits (ARAP) for planned activities, including the possibility for multiple ARAPs depending on the alternative selected and the number of construction sites. TDEC requests that these considerations be reflected in the Draft EIS.</p> <p>1 TAPCR 1200-03-08, <a href="https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm">https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm</a></p> <p>2 TAPCR 1200-03-04-.03, <a href="https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm">https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm</a></p> <p>3 TACR 1200-03-09.01(1)(b), <a href="https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm">https://publications.tnsosfiles.com/rules/1200/1200-03/1200-03.htm</a></p> <p>General</p> <p>TDEC is pleased to see the inclusion of solar and storage in the alternative actions planned for the Draft EIS.</p> <p>TDEC would also like the TVA to include additional information about how existing and future coal combustion residuals (CCRs) will be handled at the Kingston site as part of the retirement.</p> <p>TDEC appreciates the opportunity to comment on this NOI. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication of future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.</p> <p>Sincerely,</p> <p>Jennifer Tribble, PhD Senior Policy Analyst, Office of Policy and Sustainable Practices Tennessee Department of Environment and Conservation <a href="mailto:Jennifer.Tribble@tn.gov">Jennifer.Tribble@tn.gov</a></p>					
		<p>(615) 532-5043</p> <p>cc: Kendra Abkowitz, PhD, TDEC, OPSP</p> <p>Ben Bolton, TDEC, OEP</p> <p>Daniel Brock, TDEC, DA</p> <p>Lacey Hardin, TDEC, APC</p> <p>Tom Moss, TDEC, DWR</p> <p>E. Joseph Sanders, TDEC, OGC</p> <p>Matthew Taylor, TDEC, OPSP</p>					
Jul 15, 2021	Scoping Comments for 2021 Environmental Impact Statement on Kingston Fossil Plant Retirement	<p>July 15, 2021</p> <p>Via Submission to TVANepaComments.com and Electronic Mail.</p> <p>Ms. Chevailes Williams NEPA Specialist Tennessee Valley Authority 400 West Summit Hill Drive Knoxville TN 37902 <a href="mailto:nepa@tnva.com">nepa@tnva.com</a> <a href="mailto:cwilliams1@tnva.gov">cwilliams1@tnva.gov</a></p> <p>Re: Scoping Comments for 2021 Environmental Impact Statement on Kingston Fossil Plant Retirement</p> <p>Dear Ms. Williams,</p> <p>On behalf of the Center for Biological Diversity ("Center"), we submit these scoping comments on the Tennessee Valley Authority's ("TVA") Notice of Intent to prepare an Environmental Impact Statement ("EIS") for the retirement of the Kingston Fossil Plant ("Kingston Plant"). We appreciate the opportunity to provide these comments on issues including the need for TVA to include a project alternative for the safe retirement of all Kingston Plant facilities much sooner than the proposed 2033 timeline without complete replacement by another energy source. Under the proposed scoping and its most recent Integrated Resource Plan ("IRP"), TVA assumes a high-growth forecast that would necessitate a complete replacement of Kingston's lost energy generation. However, given ongoing and already planned energy development, we are concerned that TVA is overcompensating for the agency's assumed energy demand.</p> <p>Even more, with priority on new gas development, TVA is not only locking in fossil fuels for decades to come but contributing to even higher emissions through unnecessary additional fossil energy development. Indeed, a recent decision by the South Carolina Public Service Commission rejecting Duke Energy's proposed IRP is instructive regarding the analysis TVA must undertake here.<sup>1</sup> In that proceeding, South Carolina regulators emphasized the importance and value of evaluating future energy demand rather than assuming consistently high-growth forecasts. In particular, Duke's proposed IRP forecasted a more than 1% annual growth rate through 2035, and Duke relied on this forecast to justify new generation resources with priority on Combined</p> <p>1 S.C. Public Service Commission, Docket Nos. 2019-224-E &amp; 2019-225-E, Order of June 17, 2021, available at <a href="https://dms.psc.sc.gov/Attachments/Matter/23971ba9-8352-440d-8516-cfc8d5a1ce93">https://dms.psc.sc.gov/Attachments/Matter/23971ba9-8352-440d-8516-cfc8d5a1ce93</a>.</p> <p>2 Dennis Wamsted, Key Shortcomings in Duke's North Carolina IRPs: Part 2,</p>	neutral	scoping	Gaby	Sarri-Tobar	



		<p>Institute for Energy Economics and Financial Analysis (Feb. 2021), <a href="http://ieefa.org/wp-content/uploads/2021/02/Key-Shortcomings-in-Duke-North-Carolina-IRPs_Part-2_February-2021.pdf">http://ieefa.org/wp-content/uploads/2021/02/Key-Shortcomings-in-Duke-North-Carolina-IRPs_Part-2_February-2021.pdf</a>.</p> <p>Cycle Combustion Turbine ("CC") and Simple Cycle Combustion Turbine ("CT") gas plants.<sup>3</sup> However, within the last decade residential demand has instead remained stagnant, calling into question the need to develop new generation resources.<sup>4</sup></p> <p>Applying that reasoning here, it is apparent that TVA cannot proceed with its EIS on the assumption that the generation lost from closing the Kingston Plant needs to be replaced. Rather, TVA needs to consider the extent to which – either as a result of affirmative TVA actions, changes in demands and markets, or some combination of both – demand for centralized TVA power may decline in coming years, making replacement of this generation unnecessary, in whole or in part.</p> <p>We applaud TVA's decision to retire the Kingston Plant and encourage TVA to rapidly pursue retiring its other remaining coal plants. In doing so, TVA may not assume high-growth forecasts warrant centralized generation project alternatives. Thus, in all these analyses TVA must add a critical action alternative: accounting for declining demand, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.</p> <p>At present TVA only intends to consider three action alternatives for the Kingston Plant's retirement, only one of which would replace the coal plant with renewable energy. The other two alternatives prioritize CC and CT gas plants. Both of these energy options fail to address the most pressing issue today: the urgent need for a rapid transition away from all fossil fuels toward a renewable and just energy economy in order to avoid the worst impacts of the climate emergency and address the disproportionate harm experienced by environmental justice communities from the fossil fuel economy. Given the most recent climate change science and the significant climate change harms already occurring in TVA's territory, TVA must consider alternatives that would have the agency do its requisite part to advance this necessary energy transition.<sup>5</sup></p> <p>Furthermore, given the Kingston Plant's legacy as the site of the country's largest industrial spill, TVA must also</p>					
		<p>prioritize immediate remediation and adequate clean-up of the Kingston site. Retiring the Kingston Plant cannot be divorced from comprehensive action to address the harms done to communities in the Tennessee Valley – especially the Kingston coal ash workers – and the environment as a result of the 2008 coal ash spill. TVA must therefore also address its plans for expeditious remediation of the site in its upcoming EIS.</p> <p>3 See Final 2020 Duke Energy Progress IRP, <a href="https://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=7f4b3176-95d8-425d-a36b-390e1e57a175">https://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=7f4b3176-95d8-425d-a36b-390e1e57a175</a>.</p> <p>4 Wamsted, Key Shortcomings in Duke's North Carolina IRPs: Part 2.</p> <p>5 See Center for Biological Diversity "Scoping Comments for 2021 Environmental Impact Statement on Cumberland Fossil Plant Retirement," (June 10, 2021), <a href="https://biologicaldiversity.org/programs/energy-justice/pdfs/2021-06-10-Center-Cumberland-Closure-Scoping-Comments-NEPA.pdf">https://biologicaldiversity.org/programs/energy-justice/pdfs/2021-06-10-Center-Cumberland-Closure-Scoping-Comments-NEPA.pdf</a>.</p> <p>Moreover, earlier this year President Biden issued an Executive Order to transform the entire U.S. electricity sector to be carbon-free by 2035.<sup>6</sup> He emphasized the Administration's policy "to organize and deploy the full capacity of its agencies to combat the climate crisis."<sup>7</sup> As a federal agency and the country's largest public power provider, TVA must advance carbon-free electricity on a timeline consistent with climate science and the President's goal. The Kingston Plant EIS must therefore fully and fairly consider alternatives providing for the rapid retirement of the Plant and its replacement, to the extent necessary, with clean, renewable energy sources, including DER, storage and energy efficiency options, in order to comply with the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321, et seq.</p> <p>DISCUSSION</p> <p>A. TVA's Existing Alternatives For The Kingston Plant Retirement Fail To Achieve The Rapid Greenhouse Gas Reductions That Are Critical To Addressing The Climate Crisis, And The EIS Must Fully Address The GHG Impacts Of All Reasonable Alternatives.</p> <p>Given the climate crisis and the important role TVA plays as the nation's largest power provider, with massive GHG emissions, the Kingston EIS must center the replacement of the Kingston Plant with non-fossil fuel resources, including renewable energy and energy efficiency, to the extent replacement is necessary. At the moment, two of the three project alternatives consider CC</p>					
		<p>and CT gas plants that would potentially contribute to, instead of reducing, TVA's already alarming GHG emissions through 2038. With increased reliance on gas as a replacement for coal, TVA would still generate more than 34 million tons of CO<sub>2</sub> each year in 2038.<sup>8</sup> This current emphasis on further gas expansion is simply unacceptable from the standpoint of what climate science and equity demand.</p> <p>In addition, while TVA currently intends to consider one alternative prioritizing solar and storage facilities, the EIS must also account for the declining need for centralized TVA generation, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.</p> <p>1. TVA must consider renewable energy alternatives aligned with a "path to zero emissions" that would also reduce energy demand.</p> <p>6 See President Biden Executive Order on Tackling the Climate Crisis at Home and Abroad, Sections 201 and 205(b)(i) ("Biden Order") (Jan. 27, 2021), <a href="https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/">https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/</a>.</p> <p>7 Id. (emphasis added).</p> <p>8 TVA 2019 Environmental Impact Statement, Final EIS at 5-27.</p> <p>The purpose of NEPA is to identify reasonable alternatives to an agency's proposed action, and then expose and discuss the multitude of public health, environmental, socio-economic, wildlife, and other impacts of those alternatives. However, regardless of the ultimate decisions made, NEPA does not permit an agency to refuse to even consider reasonable alternatives.<sup>9</sup> Accordingly, here TVA may not rely on contract terms or simple economic considerations to refuse to consider alternative scenarios for its power mix in the coming decades, including DER and storage alternatives. This is particularly true given that TVA acknowledges that its statutory mandate under the TVA Act requires that it be a "leader in technology innovation, low-cost power and environmental stewardship."<sup>10</sup> TVA therefore should be looking for opportunities to invest in the renewable energy technologies that will help reduce electricity prices and make those technologies even more cost-competitive in the coming years.</p> <p>Recent research demonstrates that replacing fossil fuel resources with</p>					

		<p>DER, storage, and energy efficiency could provide significant financial benefits. One analysis in particular modeled the cost-effectiveness and impact of DERs and other clean energy resources on the electricity system. Under the examined scenarios, significant investment in DER would result in cumulative system-wide savings of \$301 billion by 2050 compared to a business-as-usual energy system.<sup>11</sup> The same study showed that a clean electricity standard reducing emissions by 95 percent from 1990 levels by mid-century could save \$473 billion.<sup>12</sup></p> <p>In addition to cost savings, DERs bring several additional benefits including grid management, demand response, and transmission benefits.<sup>13</sup> TVA has expressed concern that alternatives prioritizing renewables like solar as replacements to Kingston are incapable of addressing peak demand. But as the Vibrant Clean Energy report demonstrates, DER can actually minimize peak demand by about 17 percent and also effectively shift demand to meet variable supply rather than forcing supply to meet demand.<sup>14</sup></p> <p>9 See, e.g., Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv., 235 F. Supp. 2d 1143, 1154 (W.D. Wash. 2002) ("An agency may not reject a reasonable alternative because it is not within the jurisdiction of the lead agency").</p> <p>10 See Final 2019 TVA IRP at 5-1</p> <p>11 Clack et al., Technical Report: Why Local Solar For All Costs Less- A New Roadmap for the Lowest Cost Grid, Vibrant Clean Energy (2020), <a href="https://www.vibrantcleanenergy.com/wp-content/uploads/2020/12/WhyDERs_TR_Final.pdf">https://www.vibrantcleanenergy.com/wp-content/uploads/2020/12/WhyDERs_TR_Final.pdf</a></p> <p>12 Id. at 3.</p> <p>13 Armstrong et. al., Techno-Ecological Synergies of Solar Energy for Global Sustainability, 2 Nature Sustainability 560 (July 2019).</p> <p>14 Vibrant Clean Energy Technical Report (2020) at 48 (emphasis added).</p> <p>Additionally, distributed solar generation can provide benefits to communities and ecosystems including reduced water use, reduced land use, and even improved wildlife habitat, which are critically important to TVA's customers.<sup>15</sup></p> <p>Thus, TVA must consider a full range of renewable energy alternatives that would make replacement of TVA's coal power generation with other centralized energy systems, such as CC and CT gas plants, obsolete. TVA must compare the environmental impacts of investments that largely or completely rely on DER, storage and energy efficiency with the other options considered in the proposed EIS—including not only the cost of potential early retirement of fossil fuel resources and expansion of gas, but also the social cost of carbon associated with keeping them running for many years to come.</p> <p>Instead of investing in risky alternatives based on an assumption of increasing energy demand, TVA should lead the way in investing in climate-friendly and just energy solutions, like distributed solar generation, that would both reduce consumption and TVA's GHG emissions. Renewable energy and energy efficiency alternatives are proven technologies that not only make financial sense, and can lower power bills for TVA customers, but will advance TVA's path to decarbonization.</p> <p>In short, to meet its purpose of providing safe, clean, reliable, and affordable electricity to all its customers, TVA must add a critical action alternative accounting for declining demand for centralized TVA generation, including offsetting TVA generation with distributed energy resources ("DER"), storage, and energy efficiency improvements.</p> <p>15 Techno-Ecological Synergies of Solar energy for Global Sustainability (2019) at 563.</p> <p>2. TVA must meaningfully assess the impacts of greenhouse gas emissions by comparing impacts between the existing alternatives and one or more alternatives that chart a path to zero emissions.</p> <p>In other environmental reviews, TVA has refused to meaningfully consider its contributions to GHG emissions on the grounds that they are small relative to global emissions.<sup>16</sup> This approach violates NEPA.</p> <p>It is well-established that NEPA requires a robust consideration of the impacts of a project's GHG emissions in terms of its relationship to climate change. Thus, although some "speculation is . . . implicit in NEPA," agencies may not "shirk their responsibilities under NEPA by labeling any and all discussion of future environmental effects as crystal ball inquiry."<sup>17</sup></p> <p>Thus, TVA must add the necessary alternative(s) discussed above that will advance its rapid transition to zero emissions, all the while considering—and informing the public about—the likely environmental outcomes under the different alternatives. In particular, under two of the currently considered alternatives, which propose gas replacements, TVA will continue to be one of the largest contributors to the</p>					
		<p>GHGs that are fueling the climate crisis, and thus will continue to be responsible for the devastating impacts that are certain to come in the country and around the world as we continue to increase the concentrations of GHGs in the atmosphere.</p> <p>Alternatively, under a renewable energy alternative that maximizes DER, storage, and energy efficiency, and which would reduce demand for centralized and fossil fuel TVA power, TVA would not only carry out its requisite part in phasing out fossil fuels and lowering GHG emissions, but also in addressing environmental justice concerns associated with a reliance on false solutions like fossil gas.</p> <p>***</p> <p>The urgency of the climate and energy crises demand that large utilities, especially TVA, step up and meet the moment. It is now on power providers to not only rapidly phase out their fossil fuel fleets but to replace that energy with genuinely renewable energy sources and energy efficiency. With the Kingston Plant retirement, TVA has an opportunity to be a model this country needs for what a just and truly renewable energy transition should look like. TVA can and should lay the groundwork for the very technological solutions that other utilities can deploy to meet President Biden's decarbonization goal.</p> <p>16 TVA 2019 Environmental Impact Statement, Final EIS at 5-28.</p> <p>17 N. Plains Res. Council, Inc. v. Surface Transp. Bd., 668 F.3d 1067, 1079 (9th Cir. 2011) (citation omitted).</p> <p>We look forward to commenting on a Draft EIS for the Kingston Plant that fully addresses these concerns. In the meantime, please contact us should there be any further information we can provide.</p> <p>Sincerely yours,  CENTER FOR BIOLOGICAL DIVERSITY  /s/ Gaby Sarri-Tobar  Gaby Sarri-Tobar  Energy Justice Campaigner  1411 K Street NW, Suite 1300  Washington, DC 20005  gsarritobar@biologicaldiversity.org  (202) 594-7271  /s/ Howard Crystal  Howard Crystal  Energy Justice Program Legal Director  1411 K Street NW, Suite 1300  Washington, DC 20005  hcrystal@biologicaldiversity.org  (202) 809-6926</p>					

Jul 15, 2021	No new fossil gas, invest in renewables	<p>Today, Sunrise Knoxville and the people of the Tennessee Valley stand outside TVA's headquarters because we are not allowed to voice our comments during board meetings. Nine board members decide the future of TVA's power system as opposed to uplifting the voices of their nearly 10 million customers. Sunrise Knoxville supports the Tennessee Valley Authority's intent to retire its five remaining coal plants--including the Kingston plant--by 2035. In fact, it is our belief that TVA can achieve 100% clean electricity by 2030, in line with what climate science deems possible. We believe that it is imperative for the nation's largest public power entity to be a leader in the clean energy transformation.</p> <p>Unfortunately, to replace its coal plants, TVA is instead planning on building new fossil fuel power plants that burn natural gas. In addition, TVA plans to invest in the risky pipelines needed to supply natural gas, and we know that these pipelines will devastate both people's health and the planet. TVA CEO Jeff Lyash has been a proponent of new nuclear technologies like small modular reactors as well, which are unproven, potentially dangerous, and highly expensive.</p> <p>Additionally, building these new natural gas plants are also out of touch with TVA's own stated goals of attaining net-zero carbon emissions by 2050. We are calling upon TVA, as the nation's largest public power entity, to be a leader in the clean energy transition.</p> <p>Renewable energy such as wind, geothermal, and solar power provide much better alternatives that can meet the energy needs of the Valley for generations to come without further polluting our air, water, soil.</p> <p>We believe that TVA must work to bring clean, renewable energy for the people of Tennessee Valley. Clean energy is better for the health of people, the Earth, and the economy. In this transition to clean energy, TVA must also focus on creating good-paying union jobs for people across the Tennessee Valley. We hope that TVA will listen to and implement our demands as customers, residents, and community members of the Tennessee Valley. We strongly believe in the potential for the Tennessee Valley Authority to adopt an authentic public power model, under which a just transition away from hazardous fossil fuels, as well as public input in TVA's decision-making, are of the utmost importance.</p>	negative	scoping	Brady	Watson	37920
Jul 15, 2021	Public comment on Kingston Fossil Plant Retirement	<p>To Whom It May Concern</p> <p>I appreciate the opportunity on commenting on the direction of energy policy for Eastern Tennessee. I have been a living in Knoxville for 21 years. This is home to me. I have the privilege to witness many of my friends welcoming their first born and building their family in this wonderful city. I would like to take to opportunity to speak on their behalf and hoping the direction that we are choosing will ensure the propensity of the city, as well as taking care of it future residents.</p> <p>I think it is obvious that solar is the cleanest energy source among all the options, and that our collective effort to invest in renewable energy is important to our long-term growth in economic. While I understand that natural gases are possibly the cleanest fossil fuel option, and it is a quick and dirty way to get away from coal. The recent cold snaps that happened across the state has exposed vulnerability of natural gas supply. Investment in option A or B is less desirable considering additional costs and stipulation in winterizing the system against increasing climate fluctuations I see that solar energy is the wisest investment to our future.</p> <p>The decision in choosing the expansion and deployment of a power system that relies on questionable extraction method of finite resources versus investment in harvesting energy of a seemingly infinite power source seems obvious. Solar is currently our best investment for ourselves and our children.</p> <p>Lastly, the construction of natural gas pipelines are expected to receive resistances and attracts protests from environmental groups, resulting in a negative image and attention to the city.</p> <p>I strongly support the decision for option C. Thank you for your attention. Regards, Gary To, Ph.D.</p>	neutral	scoping	Gary	To	37801
Jul 15, 2021	Energy Alabama Petition for Kingston Scoping EIS	<p>TVA is beginning the process to determine how it will replace the Kingston coal plant. During this scoping process, TVA is designing a study to evaluate the impacts of different energy options, including solar and battery storage technologies. Together we can make sure that TVA not only replaces Kingston with clean energy instead of another gas plant, but we can also ensure that TVA invests in the future of the community, and the workers who will be most impacted by this decision. TVA is accepting public comments during this period and we need to make our voices heard. It's up to us to make sure that this closure is a move towards a transition to clean, sustainable energy that benefits local workers and customers. This closure will make little sense if it is just replaced by yet another expensive gas power plant. If you support a clean energy future for the Tennessee Valley, please join us in telling the TVA that renewable energy and better energy efficiency are the solutions. These solutions will prevent air and water pollution, create jobs, and lower bills for TVA customers. Tell TVA you appreciate their choice to move beyond coal, and that you want them to continue moving beyond fossil fuels! Remember to add a personal message saying why this issue is important to you!</p>	neutral	scoping	Daniel	Tait	

Jul 16, 2021	Power Reliability	<p>Ms. Pilakowski:</p> <p>Rather than force working Americans to pay for the environmental dreams of the coastal elites, producers of unreliable renewable power should be required to guarantee reliability and price that into their costs.</p> <p>Electric grid reliability and affordability matters. Wind and solar are not capable of being both reliable and affordable - as consumers in California and Texas are beginning to learn the hard way.</p> <p>Written by Chuck DeVore - June 25, 2021</p> <p>Please continue with your fossil fuel plans, as they are reliable and affordable. Most people in Knoxville know that TVA is trustworthy and can respond to the public's needs in an emergency.</p> <p>Darrell L. Thomas Knoxville, TN</p>	neutral	scoping	Darrell	Thomas	
Jul 16, 2021	Kingston EIS Scoping Comments	<p>When it was finished in 1955, Kingston was the largest coal plant in the world. Yet history will remember it for sickening and killing the unprotected workers who cleaned up the largest toxic spill in U.S. history. If you simply help those suffering workers and their families, without admitting legal guilt, you could win back much of that lost public trust.</p> <p>If you stop burning fossil fuels - condemning your children and their children to irreversibly-worsening climate change - you can again fulfill the lofty, historic mandate which lifted the Tennessee Valley from poverty: to provide affordable, reliable power while protecting our environment and building economic development.</p> <p>We now understand too well the terrible price we paid for Kingston and Bull Run's transformative electricity. Statistics say their air pollution killed hundreds or thousands of us, people we loved, though we never knew when coal was their killer. Their now-scrubbed fly ash has and will kill yet more of us. Our next transformation can be to energy that's safe and healthy for both us and our world.</p> <p>We now understand also the horrific and irreversibly escalating climate price we would pay for continuing to burn carbon: unprecedented human desperation, starvation, and thirst; environmental degradation; ever more horrific wildfires, heat waves, superstorms, and droughts; and the submerging of the world's great coastal cities. A thorough cost benefit of climate mitigation in the journal Nature found meeting the UNFCCC's 1.5° warming target would cost 1/67th the cost of business as usual: a projected annual loss of up to 30% of world per capita GDP, even without considering such costs as sea level rise or human suffering. Do your crucial part in saving us and your children from all that, and we and they will honor you as heroes.</p> <p>To be honest, natural gas is not a "bridge fuel" to renewable energy, it's a detour from it. We simply don't need a bridge to cheap, clean renewable energy. It's already come to us. So has cheap storage to level the load. And energy efficiency has always been here, the cheapest of all, ripe for the plucking.</p> <p>TVA's plans for new CO2- and methane-spewing gas plants in 2030 are clearly incompatible with the U.N.'s crucial 1.5° global warming limit, and with the Biden administration's goals of</p>	negative	scoping	John Todd	Waterman	
		<p>80% renewable energy use by 2030 and 100% renewable electricity generation by 2035. If TVA presciently extrapolates from current instead of outdated data, it will be as starkly clear to you as it is to scientists and economists worldwide that we can squander no time or money on new natural gas plants. Added up, destructive gas fracking, vast leakage of natural gas' primary component methane (which is 84 times worse for the climate than CO2 over 20 years), and gas plants' air pollution and CO2 make gas just as harmful as coal. And as domestic public and thus political support for carbon regulation (already 75%) and carbon pricing (already 68%) become overwhelming, gas fuel costs will likely rise. We customers shouldn't be stuck paying for stranded-asset gas plants long after they must be replaced with clean energy when we could have simply had clean energy to start with. Nor should we be left paying the actual costs of rosily-lowballed pie-in-the-sky carbon capture or experimental small nuclear reactors.</p> <p>You have an historic opportunity to instead invest directly in ultimately far cheaper solar and storage - which come with none of carbon and nuclear's vexing and largely irreversible economic, toxic, and climate nightmares.</p> <p>Thank You!</p>					

Jul 16, 2021	Kingston Fossil Plant Retirement (FR Doc. 2021-12693)	<p>Dear Mr. Williams:</p> <p>The Foundation for Global Sustainability urges TVA to truly step up to the challenges of climate change NOW!</p> <p>The action alternatives in the dockets for the replacement of TVA's coal fired power plants are shortsighted and most disappointing.</p> <p>As a quasi-federal entity with a de-facto monopoly over a vast area of our nation, the Tennessee Valley Authority should strive to spearhead, exemplify, and not only meet -- but exceed -- most of the Federal goals for decarbonization.</p> <p>By basing plans primarily on data of historic trends -- unquestioningly projected into the future -- TVA is apt to commit yet another horrendous miscalculation; it is prone to saddle itself with even more stranded assets!</p> <p>Addressing the climate change crisis</p> <p>Rarely a month passes without scientific discoveries of natural feedback mechanisms that aggravate the consequences of climate change. Signs that Earth's natural life-support systems are approaching tipping points are multiplying.</p> <p>At the same time that uncertainty about prevailing conditions over the lifetime of infrastructure investments is growing, technologies are evolving at an increasing pace. Many private-sector corporations have already realized that time-proven business practices are no survival strategy.</p> <p>What's called for today, is more nimble management. It needs to focus on cooperative, adaptive planning for more flexible, responsive operations.</p> <p>A multitude of smaller investments that seek to attack problems from a diversity of facets will have greater probability of success than monolithic huge investments that are hard to revert, abandon, or repurpose.</p> <p>We encourage TVA to take a step back, to first look at what it can do to help improve the sustainability and resilience of our regional and local economies and of its large, small, and individual customers, WITHOUT investments that lock in carbon emissions for decades!</p>	neutral	scoping	Wolf	Naegeli	
		<p>Although we welcomed, appreciated, and supported TVA initiatives such as "Energy Right," "Green Power Switch" and "Generation Partners" one has to admit that in the larger context they amounted to little more than public relations band-aids.</p> <p>Distributed renewable energy generation and storage</p> <p>It is high time for TVA to stop stonewalling renewable energies.</p> <p>The promising potential of widely distributed renewable energy generation and storage to minimize transmission losses and to boost community resilience is still largely untapped. It lends itself to easily manageable, quick turn-around, incremental projects that can readily be evolved and fine-tuned as new conditions, greater insights, and better technologies emerge.</p> <p>People in TVA's service areas are no less likely to welcome and personally invest in solar energy and storage than the people of Germany have done, despite getting far less sunlight in their northern latitudes than we enjoy here; if only TVA relaxes its severe restrictions and abandons its adversarial stance.</p> <p>We call upon TVA to embrace, as major planning objectives, environmental sustainability and efficiency from energy generation all the way through end use.</p> <p>Sincerely,</p> <p>Wolf Naegeli, PhD President Foundation for Global Sustainability P.O. Box 1101 Knoxville TN 37901-1101</p>					

Jul 16, 2021	NEPA Comment, KIF EIS Proposal, FR notice 86-113	<p>The TVA should upgrade its KIF unit to continue to operate it as a coal-fired electric generating facility, and explore the use of woody pellets to co-fire with coal.</p> <p>If the KIF unit is changed to a natural-gas fired unit, then it would be beholden to 1 or 2 pipelines, and thus would not be able to provide the same level of service redundancy and continuity of operations that coal-fired operations provide. As we've recently seen, our nation's economy and infrastructure cannot rely solely on pipelines to provide reliable, continuous service; especially when there are only a handful of them in place, and the construction of new pipeline capacity has been curtailed due to regulatory burdens and/or litigation liability.</p> <p>Electric generation, fuel delivery, and energy production must come from 'all of the above' options. It is short-sighted to abandon a ready-available, proven and reliable fuel source as coal, which can provide consistent baseload electric generating capacity. A coal-fired operation can be supported by multiple coal mines located in diverse locations, in multiple states and regions; thus negating localized impacts from weather or other factors that may shut-down 1 or 2 mines. In that scenario, coal can be supplied by another mine. Similarly, coal can be delivered via multiple alternative rail routings or barge routes, should 1 rail line or barge route be flooded or otherwise go out-of-service for some reason.</p> <p>The EIS should include an assessment of the environmental suite of impacts related to additional hydraulic fracturing that would be needed to supply the incremental volume of gas required to operate the KIF, the subsequent release of methane into the atmosphere, impacts of flaring operations at gas wells, and impacts on water usage and wastewater discharges. The EIS should also consider the potential impacts that would result if the KIF was not operable due to lack of gas supply from disruption, weather, threats, or malfunction; in other words, what environmental consequences would result because of a lack of electricity to wastewater treatment plants, and other environmental pollution control systems of TVA's customers.</p> <p>The EIS should also evaluate the life-cycle analysis of solar panels that are likely produced in other regions of the world that do not have the same high standards of environmental protection as in the U.S. In addition, the disposal of wind turbines or solar panels after their use should be included in the EIS, regarding the contribution of heavy metals from solar materials, battery components, and subsequent landfill requirements.</p>	neutral	scoping	Tom	Gerow, Jr.	
		<p>The EIS should also include options of incorporating renewable woody-biomass fuel as a co-firing option with coal. There is an abundance of forest in the TVA service area that are in desperate need of thinning and regeneration harvest, to sustain healthy forest conditions. Fuel biomass wood pellets provide an incremental and sustained market for timber that would allow private forest landowners to keep their lands in forests, and in a well managed condition. Using timber as a co-firing fuel with coal would also help to support job retention in the TVA's service area, as opposed to importing natural gas from outside the region, or subsidizing offshore manufacturing of wind turbines or solar panels.</p> <p>These comments are entirely my own and do not reflect nor represent any organization to which I may be affiliated.  Tom Gerow, Jr.  101 Chatfield Ct.  Cary, NC 27513  Email: one4ster@yahoo.com</p>					
Jul 16, 2021	Public comment - Kingston Fossil Plant Retirement - EIS scoping	<p>Good morning. Thank you for the opportunity to comment!</p> <p>I strongly support option C, the distributed solar panel and storage systems (20+ facilities serving Eastern TN and the TVA system). This is an extremely exciting and positive move away from fossil fuel dependence and heavy carbon emissions, which is so needed and helpful because our region is already experiencing climate change repercussions and their costs to human life and the economy.</p> <p>I am particularly concerned about the climate impacts of options A and B (natural gas/methane). Option C (solar) is a much cleaner energy source and better long term infrastructure investment which does more to mitigate future climate change costs and protect public safety and quality of life.</p> <p>While living in Eastern TN, I've seen people pay for climate change effects out of pocket in the form of mitigation infrastructure and rebuilding. We've had to deal with increased flooding and changing rainfall patterns that have caused neighbors to have to reseal and alter basements and foundations of houses that were fine and dry for the decades before. I've lived in a redone cimento unit which had uninsulated pipes for forty years that were suddenly frozen in an unusual cold spell, and which had to be replaced and insulated in the middle of winter; bursting pipes were a problem across my whole neighborhood. Not to mention a rare hailstorm destroying cars years ago because people didn't use to have protective garages in this region to guard against such previously infrequent events. Then there was the extraordinary drought and high wind conditions causing the Gatlinburg fire that killed 13 people and caused a lot of older retired folks with limited mobility to have to flee and lose homes. We're living in the world we made primarily by burning fossil fuels, and this new weather that we created has expensive and severe consequences. We need to avoid digging ourselves any deeper by committing for more fossil fuel systems that we'll have to replace anyway with cleaner tech.</p> <p>Solar writes us a check anytime the sun shines – and when it rains, TVA has an diversified investment in hydropower that can ensure consistent provision of electricity. Solar is more reliable than the limited and fluctuating natural gas prices, which is of particular concern for low-income equity and public safety in times of</p>	neutral	scoping	Megan	Maloney	

		<p>heat waves and cold snaps.</p> <p>Solar energy is a great investment - I have no doubts about the benefits because I've seen solar in action. My parents have 32 panels on their house and for the past 3 months have paid no electric bill other than a connect fee, even with trees shading the panels at times. My church has 147 panels which pay 1/3 of their energy costs (even though we keep forgetting and leaving the AC on high overnight). My partner and I are about to put solar panels on our home and are looking forward to taking advantage of the federal and state credits. It's very exciting to know TVA is also looking into solar investment; it will be a great investment. TVA's C option is a no-brainer that will have reliable, consistent, and continuing benefits for clean, safe, low-cost power. I would love to see Tennessee and TVA leading in clean energy and setting a good proactive example that protects people in and beyond this region. We have a chance to do what is good for us and the country – and the world.</p> <p>We've seen catastrophic grid failure in Texas as they get "unexpected" weather that 99% of climate scientists told us to expect. We've seen fire season and drought expand and require more intense management and equipment. Even well supported cities like NYC have had to ration power to avoid brownouts. We've seen massive wildlife die-off events due to climate change effects and human pollution, often from pipelines, and are witnessing ecosystem collapse that will affect our ecological heritage and the fisheries, pollination, agriculture, and provision of rich soil and clean water. We're already deep into the effects of climate change – we don't like it, don't want it to get worse, and have an opportunity in our hands right now to change that by investing in clean solar energy.</p> <p>Option C will serve us and the NEPA purpose of protecting, restoring, and enhancing the environment and quality of life of people in and beyond our region.</p> <p>Please allow the EIS scoping to consider the following environmental resources and potential impacts.</p> <p>1) Please consider the immense human benefit of reducing extreme weather by investing in clean energy to mitigate future climate change damage. Solar will do this; natural gas will not. Natural gas infrastructure investment locks us into the wrong direction. Failing to invest in clean energy, which we'll need to do</p>					
		<p>inevitably, is an unnecessary opportunity cost that fails us in the long term. Option A and B will cost us three times: now for infrastructure, again in increasing climate change damages, and again when that will ultimately need to be replaced with clean energy. With increasing support for greenhouse gas restrictions on emissions, natural gas infrastructure might not even be allowed to operate long enough to pay itself off. Please consider the limited and damaging future of natural gas and decreasing value of that infrastructure.</p> <p>2) Please consider the costs associated with natural gas extraction and pipeline spills:</p> <ul style="list-style-type: none"> <li>- harmful leaks of methane , a potent greenhouse gas with more than 80 times the climate warming impact of carbon dioxide;</li> <li>- instability causing earthquakes and sinkholes;</li> <li>- human health effects from byproducts.</li> </ul> <p>3) Please locate the solar installations well. This could mean using areas that are already cleared such as under power lines and not clearing forest that provides habitat, as well as placing solar installations close to points of energy use to avoid losses in transport and storage. Please consider effects of investments on historically disadvantaged communities and acquiring land through fair purchases and not using eminent domain.</p> <p>4) Please consider integrating solar into projects where they would be advantageous. There have been interesting projects in the news where the shade of these panels has been leveraged for other uses – primarily to prevent evaporation in reservoirs or provide shade to cars in parking lots, but also to cool water going in and out of power plants to increase compliance to wastewater regulation and improve cooling of the facility; in agricultural settings to provide cover for shade crops or rest and protection for cattle and poultry. Please consider if there might be secondary benefits from siting solar panel installations with additional purpose.</p> <p>5) Please consider taking advantage of federal credits for clean energy development.</p> <p>6) Please consider the benefits of avoiding pipeline leaks, as well as the associated development controversy. Solar increases property values and allows the region to advertise for green tourism and carbon-free power. People want to live next to solar panels. No</p>					
		<p>one wants to live near something like a pipeline that is statistically likely to leak and rupture and poison the air and water around their home, threatening their family's health. Solar panels are good neighbors: modern looking, harmless to neighbors' health, safe in operation, and beneficial to providing cheap and responsible power.</p> <p>7) Please consider the reliability of long term fuel sources. Natural gas is limited in supply and has a fluctuating price that can surge in stressful times when affordable power is most needed. Sunlight is free, regular, and plentiful. When properly stored and balanced with hydropower and other renewables, solar is a more reliable fuel in the long run and during crisis.</p> <p>8) Please consider that it's financially easier to incrementally replace solar panels and storage equipment as innovations occur, while it's difficult update a natural gas plant.</p> <p>9) Please consider inclusion of additional alternate energy sources such as wind power, geothermal, and methane gas capture from waste management facilities.</p> <p>Thank you for all the effort TVA has put into the public comment website! It's beautiful and easy to navigate, and honestly so much easier than going in person and trying to make notes. It's great work and I appreciate the transparency and clear language. It's been easy to share that site and info with neighbors and friends for discussion. Thank you for all the work that goes into prepping for the EIS and adhering to NEPA compliance; I can see it's an immense amount of work to incorporate public outreach – and we really appreciate you!</p> <p>Best wishes.</p>					

Jul 16, 2021	Scoping Comments of SELC et al. re Kingston Fossil Plant EIS	<p>Dear Ms. Williams:</p> <p>In response to TVA's Notice of Intent to Prepare an EIS for the Kingston Fossil Plant, Southern Environmental Law Center, Appalachian Voices, Energy Alabama, Sierra Club, Southern Alliance for Clean Energy, Tennessee Citizens for Wilderness Planning, National Parks Conservation Association, and Statewide Organizing for Community eMpowerment submit the attached scoping comments.</p> <p>Thank you in advance for your consideration. Please contact me with any questions concerning these comments.</p> <p>Best regards, Greg Buppert</p> <p>Gregory Buppert Senior Attorney Southern Environmental Law Center 201 West Main St., Ste.14 Charlottesville, VA 22902-5065 Phone: (434) 977-4090 Fax: (434) 977-1483 www.SouthernEnvironment.org</p>	neutral	scoping	Gregory	Buppert	
Jul 15, 2021	Sierra Club Comments on Kingston Fossil Plant Retirement Scoping	538 signatures - Approximately 260 comments.	mixed	scoping	Amy	Kelly	
Jul 16, 2021	Scoping comments for the TVA's Kingston Retirement of Nine Coal Fired Units EIS	<p>Dear Mr. Williams,</p> <p>The U. S. Environmental Protection Agency (EPA) is in receipt of and has reviewed the subject document in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. We understand that Tennessee Valley Authority's recent evaluation confirms that the aging coal fleet is among the oldest in the nation and is experiencing deterioration of material condition and performance. Therefore, TVA intends to prepare an Environmental Impact Statement (EIS) to assess the impacts associated with the proposed retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF) and the construction and operation of facilities to replace the retired generation. We also understand TVA's goal is to recover the generation capacity lost from retirement of the KIF units and to account for future load growth. TVA is proposing the addition of approximately 1,450 MW of replacement generation.</p> <p>Based on our review of the scoping documents and participation in the virtual scoping public meeting on June 29, 2021, it appears that the proposed improvements are reasonably consistent with the current land use of the KIF.</p> <p>Alternatives Considered: Under this action TVA plans to consider three action alternatives in the proposed EIS: (A) Retirement of KIF and construction and operation of a Combined Cycle Combustion Turbine (CC) Gas Plant on the KIF reservation (B) Retirement of KIF, investment in local and regional transmission, and construction and operation of Simple Cycle Combustion Turbine (CT) Gas Plants at alternate locations (C) Retirement of KIF and construction and operation of Solar and Storage Facilities primarily at alternate locations</p> <p>The EPA has the following comments:</p> <p>Although these or other alternatives are reasonable, some alternatives may warrant further consideration under NEPA and should be determined in the preparation of this EIS. Please use the NEPAassist tool (<a href="https://www.epa.gov/nepa/nepassist">https://www.epa.gov/nepa/nepassist</a>) and other more localized information when conducting the NEPA analysis. NEPAassist combines multiple Geographic Information System (GIS) and internet databases to help screen for environmental concerns.</p> <p>Water Quality: This proposed action has the potential to disturb a considerable amount soil. A state or county construction stormwater permit will be required before construction can begin. Construction may impact nearby Clinch-Lower River or other surface water bodies and best management practices should be applied to protect these water bodies before and after construction. Outfall monitoring and sampling should be analyzed alongside the impairment status of water bodies since base outfalls contribute to impairments.</p>	neutral	scoping	Larry	Gissentanna	



		<p>Air Quality: This project site is within an attainment area for air quality standards, however localized impacts to air quality could occur during demolition and construction due to equipment exhaust emissions and fugitive dust. The EPA recommends implementing measures to reduce dust, diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies. We also encourage controlling fugitive dust by watering or the application of other engineered controlled methods.</p> <p>Environmental Justice: Consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (<a href="https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice">https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice</a>), please ensure protected populations are not disproportionately or adversely impacted by the project. We also promote compliance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable. Please consider using the EJSCREEN tool (<a href="https://www.epa.gov/ejscreen">https://www.epa.gov/ejscreen</a>) as part of the NEPA analysis. EJSCREEN combines environmental and demographic data to help determine environmental justice concerns that are integral to the NEPA process.</p> <p>Energy and Recycling: Efforts should be made to divert any recyclable materials such as concrete, steel and asphalt away from landfills and repurpose the material instead. The appropriate NEPA document should also address potential environmental impacts to construction workers, to include the hazards of demolishing the older structures, such as from lead and asbestos latent materials. Project management should consider sustainable building practices that utilize variable forms of proven renewable energy for the proposed project, for example, solar power for supplemental electricity and lighting for the, parking lots, or special buildings that may be proposed in the various projects. Please see the following link for additional information: <a href="http://www.wbdg.org/references/federal_mandates.php">http://www.wbdg.org/references/federal_mandates.php</a>.</p> <p>Thank you for the opportunity to provide comments on the proposed project at Kingston Fossil Plant. Please provide Kajumba.Ntale@EPA.GOV Chief, NEPA Section, with an electronic version of the draft EIS for further review. In addition to your NEPA documents, please remember to keep the local community informed and involved throughout the project process through community meetings and through local and social media outlets. If you have any questions, feel free to contact me via the information provided below.</p> <p>Sincerely,</p> <p>Larry O. Gissentanna Project Manager, DoD &amp; Federal Facilities</p>					
		<p>U.S. Environmental Protection Agency/ Region 4 Strategic Programs Office, NEPA Section 61 Forsyth Street, SW Atlanta, GA 30303-8960 Office: 404-562-8248 <a href="mailto:gissentanna.larry@epa.gov">gissentanna.larry@epa.gov</a></p>					
TVA Virtual							
Jul 21, 2021							
04:01 AM							

**From:** [Gabriela Sarri-Tobar](#)  
**To:** [nepa](#)  
**Subject:** Scoping Comments for 2021 Environmental Impact Statement on Kingston Fossil Plant Retirement  
**Date:** Thursday, July 15, 2021 8:32:11 AM  
**Attachments:** [2021.07.15 Center for Biological Diversity Kingston Plant Public Comment.pdf](#)

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Dear Ms. Williams,

On behalf of the Center for Biological Diversity we submit these scoping comments (attached) on TVA's Notice of Intent to prepare an EIS for the retirement of the Kingston Fossil Plant.

Thank you for your consideration,  
Gaby Sarri-Tobar

**Gaby Sarri-Tobar**  
(she/ her/ hers)  
*Campaigner, Energy Justice Program*  
Center for Biological Diversity  
1411 K Street. NW, Suite 1300  
Washington, D.C. 20005  
Cell: (202) 594-7271  
Twitter: @GabySarriTobar

**From:** [Tait, Daniel](#)  
**To:** [nepa](#)  
**Subject:** Energy Alabama Petition for Kingston Scoping EIS  
**Date:** Thursday, July 15, 2021 10:54:10 AM  
**Attachments:** [TVA Kingston EIS Petition.pdf](#)  
[TVA Kingston EIS Petition Signatories.xls](#)

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Dear TVA NEPA Team,

On behalf of Energy Alabama, please find the attached petition and signatories related to the currently open request for scoping comments on the Kingston Fossil Plant.

Please confirm receipt of this email.

Respectfully,  
Daniel

**Daniel Tait**

Chief Operating Officer  
Energy Alabama  
p: (256) 812-1431  
m: (256) 303-7773  
a: PO Box 1381, Huntsville, AL 35807  
w: [energyalabama.org](http://energyalabama.org)  
e: [dtait@alcse.org](mailto:dtait@alcse.org)

[Join Energy Alabama! Memberships start at just \\$5.](#)

**From:** [Amy Kelly](#)  
**To:** [Williams, A Chevales](#); [nepa](#); [Amy Kelly](#)  
**Cc:** [Levenshus, Jonathan](#)  
**Subject:** Sierra Club Comments on Kingston Fossil Plant Retirement Scoping  
**Date:** Thursday, July 15, 2021 1:31:27 PM  
**Attachments:** [TVA - Kingston Scoping Comments Cover Letter - 2021-07-15.pdf](#)  
[TVA - Kingston Scoping Comments to Submit - 2021-07-15.pdf](#)

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Please find the attached comments from Sierra Club.

The following document (attached) contains 583 signatures, over half of which are accompanied by additional personal messages. Thank you for considering their input.

We will also be submitting joint technical comments in a separate email.

---

Amy Kelly  
Tennessee Representative  
Sierra Club Beyond Coal Campaign  
[amy.kelly@sierraclub.org](mailto:amy.kelly@sierraclub.org)  
(423) 398-3506 (office)  
(514) 623-3878 (cell)

**From:** [Greg Buppert](#)  
**To:** [nepa](#); [Williams, A Chevales](#)  
**Cc:** [Trey Bussey](#); [Amanda Garcia](#); [nepa](#)  
**Subject:** Scoping Comments of SELC et al. re Kingston Fossil Plant EIS  
**Date:** Thursday, July 15, 2021 4:54:11 PM  
**Attachments:** [2021 07 15 SELC et al. Scoping Comments - Kingston Fossil Plant EIS.PDF](#)

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Dear Ms. Williams:

In response to TVA's Notice of Intent to Prepare an EIS for the Kingston Fossil Plant, Southern Environmental Law Center, Appalachian Voices, Energy Alabama, Sierra Club, Southern Alliance for Clean Energy, Tennessee Citizens for Wilderness Planning, National Parks Conservation Association, and Statewide Organizing for Community eMpowerment submit the attached scoping comments.

Thank you in advance for your consideration. Please contact me with any questions concerning these comments.

Best regards,

Greg Buppert

**Gregory Buppert**

**Senior Attorney**

Southern Environmental Law Center

201 West Main St., Ste.14

Charlottesville, VA 22902-5065

Phone: (434) 977-4090

Fax: (434) 977-1483

[www.SouthernEnvironment.org](http://www.SouthernEnvironment.org)

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**From:** [Jennifer Tribble](#)  
**To:** [nepa](#)  
**Cc:** [Kendra Abkowitz](#); [Matthew K. Taylor](#)  
**Subject:** TDEC Comment on TVA's NOI to Prepare an EIS for the Retirement of the KIF  
**Date:** Wednesday, July 14, 2021 2:30:31 PM  
**Attachments:** [image001.png](#)  
[2021-7-1--TDEC Comments TVA KIF NOI.pdf](#)

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Dear Ms. Williams:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority's (TVA) Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the retirement of the nine coal-fired units at the Kingston Fossil Plant (KIF). TDEC acknowledges that there is limited detail available in the NOI and plans to submit additional, detailed comments on planned activities upon release of a Draft EIS. TDEC also encourages the TVA to consult with relevant local parties for actions which might be subject to local agency approval.

TDEC appreciates the opportunity to comment on this NOI. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication of future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Best,



**Jennifer Tribble, PhD** | Senior Policy Analyst  
Office of Policy and Sustainable Practices  
Tennessee Tower, Second Floor  
312 Rosa L. Parks Ave., Nashville, TN 37243  
p. 615-532-5043

[jennifer.tribble@tn.gov](mailto:jennifer.tribble@tn.gov)

We value your feedback! Please complete our [customer satisfaction survey](#).

**From:** [J.R. Russell](#)  
**To:** [Williams, A Chevales](#)  
**Cc:** [nepa](#)  
**Subject:** RE: Kingston Fossil Plant Retirement  
**Date:** Thursday, July 8, 2021 1:40:35 PM  
**Attachments:** [20210708124341271.pdf](#)

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Mr. Williams –

Attached is a letter containing comments from Senator Ken Yager (Kingston) regarding the Notice of Intent to prepare an environmental impact statement for the retirement of the Kingston Fossil Plant. A physical copy is also in the mail. If you have any questions or concerns, please do not hesitate to reach out to the office.

Regards,

**J.R. Russell**

*Executive Legislative Assistant*  
The Office of Senator Ken Yager,  
Chairman for the Republican Caucus  
425 Rep. John Lewis Way N, Suite 704  
Nashville, TN 37243  
O: (615) 741-1449

**From:** [Kopec, Brett A](#)  
**To:** [nepa](#)  
**Cc:** [Janowicz, Jon A](#)  
**Subject:** Fw: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0237 - NOI TVA to Prepare an EIS for Kingston Fossil Plant Retirement Project, Tennessee  
**Date:** Tuesday, June 22, 2021 7:37:04 AM

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Brett Kopec  
USGS  
Administrative Operations Assistant

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**From:** Gordon, Alison D <agordon@usgs.gov>  
**Sent:** Monday, June 21, 2021 5:18 PM  
**To:** Kopec, Brett A <bkopec@usgs.gov>  
**Cc:** Janowicz, Jon A <jjanowicz@usgs.gov>  
**Subject:** Fw: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0237 - NOI TVA to Prepare an EIS for Kingston Fossil Plant Retirement Project, Tennessee

The USGS has no comment at this time. Thank you.

---

**From:** oepchq@ios.doi.gov <oepchq@ios.doi.gov>  
**Sent:** Tuesday, June 15, 2021 10:39 AM  
**To:** Reddick, Virginia <Virginia\_Reddick@ios.doi.gov>; Treichel, Lisa C <Lisa\_Treichel@ios.doi.gov>; Alam, Shawn K <Shawn\_Alam@ios.doi.gov>; Braegelmann, Carol <carol\_braegelmann@ios.doi.gov>; Kelly, Cheryl L <cheryl\_kelly@ios.doi.gov>; ERs, FWS HQ <FWS\_HQ\_ERs@fws.gov>; Runkel, Roxanne <Roxanne\_Runkel@nps.gov>; Stedeford, Melissa <Melissa\_Stedeford@nps.gov>; Hamlett, Stephanie R <shamlett@osmre.gov>; Janowicz, Jon A <jjanowicz@usgs.gov>; Gordon, Alison D <agordon@usgs.gov>; oepchq@ios.doi.gov <oepchq@ios.doi.gov>; Stanley, Joyce A <Joyce\_St Stanley@ios.doi.gov>  
**Subject:** ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0237 - NOI TVA to Prepare an EIS for Kingston Fossil Plant Retirement Project, Tennessee

This e-mail alerts you to a Environmental Review (ER) request from the Office of Environmental Policy and Compliance (OEPC). This ER can be accessed [here](#). To access electronic ERs visit the Environmental Assignments website: <https://ecl.doi.gov/ERs.cfm>. For assistance, please contact the Environmental Review Team at 202-208-5464.

Comments due to Agency by: 07/15/21



**From:** [Rick Phelps](#)  
**To:** [nepa](#)  
**Subject:** Comments re : Kingston Coal Fired Plant EIS Options; 6/29/21 Hearing  
**Date:** Wednesday, July 7, 2021 9:58:16 AM

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I appreciate the opportunity to comment on the TVA Kingston Coal Fired Plant retirement EIS.

I am a retired environmental analytical chemist and am very familiar with coal combustion residue ( CCR) concerns , emissions , ambient air quality parameters and control measures at CF IndustrialPP. My employer, Eastman Chemical, has burned about 10 million lbs of SWVA coal daily.

CCR is a toxic material. EPA failed to properly designate it as such , However, it clearly is hazardous and the drastic environmental and human results from the Kingston spill clearly demonstrated that.

Therefore, to even consider to operate Kingston on coal is unacceptable as it continues to produce CCR and impound it on site; thus compounding the situation. Additionally, the uncontrolled CO/CO<sub>2</sub> and NOX emissions would be counter to the Biden emission reduction goals, These Goals are important parts of remediation of the Climate Crisis.

The two NG fired options are stated to reduce present CF CO<sub>2</sub> emissions up to 50%. I note that the third, Solar option provides 100% . Further, the NG options fail to include the massive external environmental impacts related to the extraction ( hydrofracking ), transport and the continued CO<sub>2</sub> emissions from NG combustion.

The NG fueled options simply create stranded cost as NG will ultimately become replaced by sustainable energy sources, TVA, conversely should be forward- focused and support renewable SOLAR at Kingston and the other dispersed locations, Why not lead in renewables ?

TVA further states that the Kingston site will be converted to a developable " brown site ". This will involve stabilizing or removal of the millions of tons of CCR ! How this is to be accomplished is unknown and unstated. The work necessary to create a developable site will provide needed jobs for local displaced TVA employees, HOWEVER, they MUST be properly protected and compensated.

In conclusion :

I support the immediate retirement of the coal fired Kingston Plant and the transition to non carbon means of power generation.

TVA must support remediation of the Global Climate Crisis by moving to Solar-storage non-carbon combustion energy.

Finally, the retirement of the Kingston plant must recognize and remediate the economic

impacts created on its workers !

Richard C Phelps  
1127 Potter Blvd  
Tullahoma, Tn 37388  
931 222 0367  
Citizens Climate Lobby, Sierra Club  
Consulting Chemist

**From:** [Gamble, Marty \(CONTR\)](#)  
**To:** [nepa](#)  
**Subject:** For Kingston Fossil Plant replacement, consider more options through Kairos Power - perfect location & local SME support team  
**Date:** Thursday, July 8, 2021 1:21:46 PM

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**Marty Gamble, PSP**

Project Controls Analyst

DOE Office: 865-241-1122

Cell: 865-806-0834

Email: [marty.gamble@orem.doe.gov](mailto:marty.gamble@orem.doe.gov)

Email: [gamblem@p2s.com](mailto:gamblem@p2s.com)

**From:** [Julia Clark](#)  
**To:** [nepa](#)  
**Subject:** Kingston coal Ash plant  
**Date:** Thursday, July 8, 2021 5:40:28 PM

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My response and opinion to this is leave it alone!!! stop messing with things that aren't broken. People are working they're making a living in an earning a paycheck they're supporting their families. Why would you want to disrupt that unless you have a private agenda of your own. Don't cross and burn Bridges with people in today's society it's dysfunctional enough. The last thing we need is more people depressed, angry, kids needing food stamps because there's no food in the house, because the parents can't earn a paycheck. Its ridiculous to even think of. It's selfish. Quit acting like a Biden lover and a Hillary lover and just stop. Life is hard enough we don't need you to add to it.

**From:** [Ignacy Fonberg](#)  
**To:** [nepa](#)  
**Subject:** TVA  
**Date:** Thursday, July 15, 2021 12:05:26 AM

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## TVA

To TVA: NEPA Compliance Specialist, Chevales Wiliams, Chattanooga, Reference : FR 2021-12693. I was glad to learn that TVA decided to lower its emission of CO2 by replacing the Kingston plants coal with natural gas. It would be even better if TVA used more renewable resources like Solar and wind power, especially considering the likelihood of climate disasters. Because avoiding carbon emissions for my electricity was very important to me I installed a solar panels system on my house many years ago. This is what TVA should do, now that the aged Kingston plants operation has become uneconomical. We are in severe climate crisis and TVA should not plan to continue the use of fossil-fuel based electricity generation.

I urge you to change the announced plan. Please use this opportunity to emphasize renewables and energy-saving approaches.

Ignacy Fonberg  
316 S. Cherokee St.  
Jonesborough TN  
423-753-5677

Sent from my iPad

**From:** [Pilakowski, Ashley Anne](#)  
**To:** [Williams, A Chevales](#); [Wade, Blair](#); [Palacios, Ameerah](#)  
**Subject:** FW: Power Reliability  
**Date:** Friday, July 16, 2021 6:13:17 AM

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**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

FYI – I think this was meant for a KIF comment.

Thanks,  
Ashley

---

**From:** DARRELL THOMAS <thomas253409@bellsouth.net>  
**Sent:** Thursday, July 15, 2021 7:46 PM  
**To:** Pilakowski, Ashley Anne <aapilakowski@tva.gov>  
**Subject:** Power Reliability

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Ms. Pilakowski:

Rather than force working Americans to pay for the environmental dreams of the coastal elites, producers of unreliable renewable power should be required to guarantee reliability and price that into their costs.

Electric grid reliability and affordability matters. Wind and solar are not capable of being both reliable and affordable - as consumers in California and Texas are beginning to learn the hard way.

Written by Chuck DeVore - June 25, 2021

Please continue with your fossil fuel plans, as they are reliable and affordable. Most people in Knoxville know that TVA is trustworthy and can respond to the public's needs in an emergency.

Darrell L. Thomas  
Knoxville, TN

**From:** [John Todd Waterman](#)  
**To:** [nepa](#); [Williams, A Chevales](#)  
**Subject:** Kingston EIS Scoping Comments  
**Date:** Thursday, July 15, 2021 10:55:03 PM

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Kingston EIS Scoping Comments submitted by

John Todd Waterman

When it was finished in 1955, Kingston was the largest coal plant in the world. Yet history will remember it for sickening and killing the unprotected workers who cleaned up the largest toxic spill in U.S. history. If you simply help those suffering workers and their families, without admitting legal guilt, you could win back much of that lost public trust.

If you stop burning fossil fuels - condemning your children and their children to irreversibly-worsening climate change - you can again fulfill the lofty, historic mandate which lifted the Tennessee Valley from poverty: to provide affordable, reliable power while protecting our environment and building economic development.

We now understand too well the terrible price we paid for Kingston and Bull Run’s transformative electricity. Statistics say their air pollution killed hundreds or thousands of us, people we loved, though we never knew when coal was their killer. Their now-scrubbed fly ash has and will kill yet more of us. Our next transformation can be to energy that’s safe and healthy for both us and our world.

We now understand also the horrific and irreversibly escalating climate price we would pay for continuing to burn carbon: unprecedented human desperation, starvation, and thirst; environmental degradation; ever more horrific wildfires, heat waves, superstorms, and droughts; and the submerging of the world's great coastal cities. A thorough cost benefit of climate mitigation in the journal Nature found meeting the

UNFCCC's 1.5 °C warming target would cost 1/67th the cost of business as usual: a projected annual loss of up to 30% of world per capita GDP, even without considering such costs as sea level rise or human suffering. Do your crucial part in saving us and your children from all that, and we and they will honor you as heroes.

To be honest, natural gas is not a “bridge fuel” to renewable energy, it's a detour from it. We simply don't need a bridge to cheap, clean renewable energy. It's already come to us. So has cheap storage to level the load. And energy efficiency has always been here, the cheapest of all, ripe for the plucking.

TVA's plans for new CO<sub>2</sub>- and methane-spewing gas plants in 2030 are clearly incompatible with the U.N.'s crucial 1.5 °C global warming limit, and with the Biden administration's goals of 80% renewable energy use by 2030 and 100% renewable electricity generation by 2035. If TVA presciently extrapolates from current instead of outdated data, it will be as starkly clear to you as it is to scientists and economists worldwide that we can squander no time or money on new natural gas plants. Added up, destructive gas fracking, vast leakage of natural gas' primary component methane (which is 84 times worse for the climate than CO<sub>2</sub> over 20 years), and gas plants' air pollution and CO<sub>2</sub> make gas just as harmful as coal. And as domestic public and thus political support for carbon regulation (already 75%) and carbon pricing (already 68%) become overwhelming, gas fuel costs will likely rise. We customers shouldn't be stuck paying for stranded-asset gas plants long after they must be replaced with clean energy when we could have simply had clean energy to start with. Nor should we be left paying the actual costs of rosily-lowballed pie-in-the-sky carbon capture or experimental small nuclear reactors.

You have an historic opportunity to instead invest directly in ultimately far cheaper solar and storage - which come with none of carbon and nuclear's vexing and largely irreversible economic, toxic, and climate nightmares.

Thank You!



**From:** [Wolf Naegeli](#)  
**To:** [nepa](#)  
**Subject:** Kingston Fossil Plant Retirement (FR Doc. 2021-12693)  
**Date:** Thursday, July 15, 2021 10:44:17 PM  
**Importance:** High

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**This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the "Report Phishing" button located on the Outlook Toolbar at the top of your screen.**

Dear Mr. Williams:

**The Foundation for Global Sustainability urges TVA to truly step up to the challenges of climate change NOW!**

The action alternatives in the dockets for the replacement of TVA's coal fired power plants are shortsighted and most disappointing.

As a quasi-federal entity with a de-facto monopoly over a vast area of our nation, the Tennessee Valley Authority should strive to spearhead, exemplify, and not only meet -- but exceed -- most of the Federal goals for decarbonization.

By basing plans primarily on data of historic trends -- unquestioningly projected into the future -- TVA is apt to commit yet another horrendous miscalculation; it is prone to saddle itself with even more stranded assets!

### **Addressing the climate change crisis**

Rarely a month passes without scientific discoveries of natural feedback mechanisms that aggravate the consequences of climate change. Signs that Earth's natural life-support systems are approaching tipping points are multiplying.

At the same time that uncertainty about prevailing conditions over the lifetime of infrastructure investments is growing, technologies are evolving at an increasing pace. Many private-sector corporations have already realized that time-proven business practices are no survival strategy.

What's called for today, is more nimble management. It needs to focus on cooperative, adaptive planning for more flexible, responsive operations.

A multitude of smaller investments that seek to attack problems from a diversity of facets will have greater probability of success than monolithic huge investments that are hard to revert, abandon, or repurpose.

**We encourage TVA to take a step back, to first look at what it can do to help improve the sustainability and resilience of our regional and local economies and of its large, small, and individual customers, WITHOUT investments that lock in carbon emissions for decades!**

Although we welcomed, appreciated, and supported TVA initiatives such as "Energy Right,"

"Green Power Switch" and "Generation Partners" one has to admit that in the larger context they amounted to little more than public relations band-aids.

**Distributed renewable energy generation and storage**

**It is high time for TVA to stop stonewalling renewable energies.**

The promising potential of widely distributed renewable energy generation and storage to minimize transmission losses and to boost community resilience is still largely untapped. It lends itself to easily manageable, quick turn-around, incremental projects that can readily be evolved and fine-tuned as new conditions, greater insights, and better technologies emerge.

People in TVA's service areas are no less likely to welcome and personally invest in solar energy and storage than the people of Germany have done, despite getting far less sunlight in their northern latitudes than we enjoy here; if only TVA relaxes its severe restrictions and abandons its adversarial stance.

**We call upon TVA to embrace, as major planning objectives, environmental sustainability and efficiency from energy generation all the way through end use.**

Sincerely,

Wolf Naegeli, PhD  
President  
Foundation for Global Sustainability  
P.O. Box 1101  
Knoxville TN 37901-1101

**From:** [Tom Gerow, Jr.](#)  
**To:** [nepa](#)  
**Subject:** NEPA Comment, KIF EIS Proposal, FR notice 86-113  
**Date:** Thursday, July 15, 2021 6:27:40 PM

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The TVA should upgrade its KIF unit to continue to operate it as a coal-fired electric generating facility, and explore the use of woody pellets to co-fire with coal.

If the KIF unit is changed to a natural-gas fired unit, then it would be beholden to 1 or 2 pipelines, and thus would not be able to provide the same level of service redundancy and continuity of operations that coal-fired operations provide. As we've recently seen, our nation's economy and infrastructure cannot rely solely on pipelines to provide reliable, continuous service; especially when there are only a handful of them in place, and the construction of new pipeline capacity has been curtailed due to regulatory burdens and/or litigation liability.

Electric generation, fuel delivery, and energy production must come from 'all of the above' options. It is short-sighted to abandon a ready-available, proven and reliable fuel source as coal, which can provide consistent baseload electric generating capacity. A coal-fired operation can be supported by multiple coal mines located in diverse locations, in multiple states and regions; thus negating localized impacts from weather or other factors that may shut-down 1 or 2 mines. In that scenario, coal can be supplied by another mine. Similarly, coal can be delivered via multiple alternative rail routings or barge routes, should 1 rail line or barge route be flooded or otherwise go out-of-service for some reason.

The EIS should include an assessment of the environmental suite of impacts related to additional hydraulic fracturing that would be needed to supply the incremental volume of gas required to operate the KIF, the subsequent release of methane into the atmosphere, impacts of flaring operations at gas wells, and impacts on water usage and wastewater discharges. The EIS should also consider the potential impacts that would result if the KIF was not operable due to lack of gas supply from disruption, weather, threats, or malfunction; in other words, what environmental consequences would result because of a lack of electricity to wastewater treatment plants, and other environmental pollution control systems of TVA's customers.

The EIS should also evaluate the life-cycle analysis of solar panels that are likely produced in other regions of the world that do not have the same high standards of environmental protection as in the U.S. In addition, the disposal of wind turbines or solar panels after their use should be included in the EIS, regarding the contribution of heavy metals from solar materials, battery components, and subsequent landfill requirements.

The EIS should also include options of incorporating renewable woody-biomass fuel as a co-firing option with coal. There is an abundance of forest in the TVA service area that are in desperate need of thinning and regeneration harvest, to sustain healthy forest conditions. Fuel biomass wood pellets provide an incremental and sustained market for timber that would allow private forest landowners to keep their lands in forests, and in a well managed condition. Using timber as a co-firing fuel with coal would also help to support job retention in the TVA's service area, as opposed to importing natural gas from outside the region, or subsidizing offshore manufacturing of wind turbines or solar panels.

These comments are entirely my own and do not reflect nor represent any organization to

which I may be affiliated.

Tom Gerow, Jr.  
101 Chatfield Ct.  
Cary, NC 27513  
Email: [one4ster@yahoo.com](mailto:one4ster@yahoo.com)

**From:** [Megan Maloney](#)  
**To:** [nepa](#)  
**Subject:** Public comment - Kingston Fossil Plant Retirement - EIS scoping  
**Date:** Thursday, July 15, 2021 7:31:38 PM  
**Attachments:** [Maloney\\_Public\\_Comment\\_EISscopingKingstonReplacement.docx](#)

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Good morning!

I am writing to submit the attached public comment regarding the EIS scoping for the Kingston Fossil Plant Retirement.

Thank you very much for your work. I understand the EIS research is extremely involved and we appreciate what you do.

Best wishes,

Megan Maloney

828.231.3205

Megan Maloney  
341 Dawn Hill Lane  
Maryville TN 37801  
828.231.3205  
[megmalon@gmail.com](mailto:megmalon@gmail.com)

Chevales Williams  
NEPA Specialist  
[cwilliams1@tva.gov](mailto:cwilliams1@tva.gov)  
[423-751-7316](tel:423-751-7316)  
1101 Market Street, BRC 2C  
Chattanooga, TN 37402

**Good morning. Thank you for the opportunity to comment!**

**I strongly support option C, the distributed solar panel and storage systems (20+ facilities serving Eastern TN and the TVA system). This is an extremely exciting and positive move away from fossil fuel dependence and heavy carbon emissions, which is so needed and helpful because our region is already experiencing climate change repercussions and their costs to human life and the economy.**

**I am particularly concerned about the climate impacts of options A and B (natural gas/methane). Option C (solar) is a much cleaner energy source and better long term infrastructure investment which does more to mitigate future climate change costs and protect public safety and quality of life.**

While living in Eastern TN, I've seen people pay for climate change effects out of pocket in the form of mitigation infrastructure and rebuilding. We've had to deal with increased flooding and changing rainfall patterns that have caused neighbors to have to reseal and alter basements and foundations of houses that were fine and dry for the decades before. I've lived in a redone cements unit which had uninsulated pipes for forty years that were suddenly frozen in an unusual cold spell, and which had to be replaced and insulated in the middle of winter; bursting pipes were a problem across my whole neighborhood. Not to mention a rare hailstorm destroying cars years ago because people didn't use to have protective garages in this region to guard against such previously infrequent events. Then there was the extraordinary drought and high wind conditions causing the Gatlinburg fire that killed 13 people and caused a lot of older retired folks with limited mobility to have to flee and lose homes. **We're living in the world we made primarily by burning fossil fuels, and this new weather that we created has expensive and severe consequences. We need to avoid digging ourselves any deeper by committing for more fossil fuel systems that we'll have to replace anyway with cleaner tech.**

**Solar writes us a check anytime the sun shines** – and when it rains, TVA has an diversified investment in hydropower that can ensure consistent provision of electricity. Solar is more reliable than the limited and fluctuating natural gas prices, which is of particular concern for low-income equity and public safety in times of heat waves and cold snaps.

**Solar energy is a great investment** - I have no doubts about the benefits because I've seen solar in action. My parents have 32 panels on their house and for the past 3 months have paid no electric bill other than a connect fee, even with trees shading the panels at times. My church has 147 panels which pay 1/3 of their energy costs (even though we keep forgetting and leaving the AC on high overnight). My partner and I are about to put solar panels on our home and are looking forward to taking advantage of the federal and state credits. It's very exciting to know TVA is also looking into solar investment; it will

be a great investment. **TVA's Coption is a no-brainer that will have reliable, consistent, and continuing benefits for clean, safe, low-cost power.**

**I would love to see Tennessee and TVA leading in clean energy and setting a good proactive example that protects people in and beyond this region.** We have a chance to do what is good for us and the country – and the world.

We've seen catastrophic grid failure in Texas as they get "unexpected" weather that 99% of climate scientists told us to expect. We've seen fire season and drought expand and require more intense management and equipment. Even well supported cities like NYC have had to ration power to avoid brownouts. We've seen massive wildlife die-off events due to climate change effects and human pollution, often from pipelines, and are witnessing ecosystem collapse that will affect our ecological heritage and the fisheries, pollination, agriculture, and provision of rich soil and clean water. We're already deep into the effects of climate change – we don't like it, don't want it to get worse, and have an opportunity in our hands right now to change that by investing in clean solar energy.

**Option C will serve us and the NEPA purpose of protecting, restoring, and enhancing the environment and quality of life of people in and beyond our region.**

Please allow the EIS scoping to consider the following environmental resources and potential impacts.

- 1) Please consider the immense human benefit of reducing extreme weather by investing in clean energy to mitigate future climate change damage. Solar will do this; natural gas will not. Natural gas infrastructure investment locks us into the wrong direction. Failing to invest in clean energy, which we'll need to do inevitably, is an unnecessary opportunity cost that fails us in the long term. Option A and B will cost us three times: now for infrastructure, again in increasing climate change damages, and again when that will ultimately need to be replaced with clean energy. With increasing support for greenhouse gas restrictions on emissions, natural gas infrastructure might not even be allowed to operate long enough to pay itself off. Please consider the limited and damaging future of natural gas and decreasing value of that infrastructure.
- 2) **Please consider the costs associated with natural gas extraction and pipeline spills:**
  - harmful leaks of methane, a potent greenhouse gas with more than 80 times the climate warming impact of carbon dioxide;
  - instability causing earthquakes and sinkholes;
  - human health effects from byproducts.
- 3) **Please locate the solar installations well.** This could mean using areas that are already cleared such as under power lines and not clearing forest that provides habitat, as well as placing solar installations close to points of energy use to avoid losses in transport and storage. Please consider effects of investments on historically disadvantaged communities and acquiring land through fair purchases and not using eminent domain.
- 4) **Please consider integrating solar into projects where they would be advantageous.** There have been interesting projects in the news where the shade of these panels has been leveraged for other uses – primarily to prevent evaporation in reservoirs or provide shade to cars in parking lots, but also to cool water going in and out of power plants to increase compliance to wastewater regulation and improve cooling of the facility; in agricultural settings to provide cover for shade crops or rest and protection for cattle and poultry. Please consider if there might be secondary benefits from siting solar panel installations with additional purpose.
- 5) **Please consider taking advantage of federal credits for clean energy development.**

**6) Please consider the benefits of avoiding pipeline leaks, as well as the associated development controversy. Solar increases property values and allows the region to advertise for green tourism and carbon-free power. People want to live next to solar panels. No one wants to live near something like a pipeline that is statistically likely to leak and rupture and poison the air and water around their home, threatening their family's health. Solar panels are good neighbors: modern looking, harmless to neighbors' health, safe in operation, and beneficial to providing cheap and responsible power.**

**7) Please consider the reliability of long term fuel sources.** Natural gas is limited in supply and has a fluctuating price that can surge in stressful times when affordable power is most needed. Sunlight is free, regular, and plentiful. When properly stored and balanced with hydropower and other renewables, solar is a more reliable fuel in the long run and during crisis.

**8) Please consider that it's financially easier to incrementally replace solar panels and storage equipment as innovations occur, while it's difficult update a natural gas plant.**

**9) Please consider inclusion of additional alternate energy sources** such as wind power, geothermal, and methane gas capture from waste management facilities.

Thank you for all the effort TVA has put into the public comment website! It's beautiful and easy to navigate, and honestly so much easier than going in person and trying to make notes. It's great work and I appreciate the transparency and clear language. It's been easy to share that site and info with neighbors and friends for discussion. Thank you for all the work that goes into prepping for the EIS and adhering to NEPA compliance; I can see it's an immense amount of work to incorporate public outreach – and we really appreciate you!

Best wishes.



**From:** [Pilakowski, Ashley Anne](#)  
**To:** [Williams, A Chevales](#); [Wade, Blair](#); [Palacios, Ameerah](#)  
**Subject:** FW: Power Reliability  
**Date:** Friday, July 16, 2021 6:13:17 AM

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**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

FYI – I think this was meant for a KIF comment.

Thanks,  
Ashley

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**From:** DARRELL THOMAS <thomas253409@bellsouth.net>  
**Sent:** Thursday, July 15, 2021 7:46 PM  
**To:** Pilakowski, Ashley Anne <aapilakowski@tva.gov>  
**Subject:** Power Reliability

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Ms. Pilakowski:

Rather than force working Americans to pay for the environmental dreams of the coastal elites, producers of unreliable renewable power should be required to guarantee reliability and price that into their costs.

Electric grid reliability and affordability matters. Wind and solar are not capable of being both reliable and affordable - as consumers in California and Texas are beginning to learn the hard way.

Written by Chuck DeVore - June 25, 2021

Please continue with your fossil fuel plans, as they are reliable and affordable. Most people in Knoxville know that TVA is trustworthy and can respond to the public's needs in an emergency.

Darrell L. Thomas  
Knoxville, TN

**From:** [Curtis - The Bicentennialist](#)  
**To:** [nepa](#)  
**Subject:** Comment on Coal Plant Retirements  
**Date:** Wednesday, June 23, 2021 1:38:10 PM

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Seems crazy to un-needlessly punish your customers with higher electricity prices. The logical and safe choice is to have both coal & nat gas capabilities. Install best available technology (proven & reasonable) on say 5 of the units, and convert 4 units to gas. We dont want to be a political football in the church of climatology. Look no further than brownouts and blackouts in California and Texas. We want affordable and non-weather dependent electricity!

C.Hopkins

**From:** [jack.keeling1@yahoo.com](mailto:jack.keeling1@yahoo.com)  
**To:** [nepa](#)  
**Subject:** Comment on possible closure of Kingston Fossil Plant  
**Date:** Thursday, June 17, 2021 6:43:13 PM

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I propose an alternative to existing proposals for replacement of existing plant.

As plant is demolished replace with Small Modular Reactor (SMR) using the same site. Demolish only the units necessary to house a SMR. Once first SMR is complete, continue cycle of demolishing additional units and replacing them with a SMR until all 9 coal units are demolished.

Existing coal units can continue operation until demolition begins on that unit.

Consider use of a Korean EPC firm with proven nuclear experience.

**From:** [TVAINFO](#)  
**To:** [nepa](#)  
**Subject:** FW: Retiring the Kingston Coal Plant  
**Date:** Friday, June 18, 2021 12:43:10 PM

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The following message was received through the TVA Info email system. Please respond as appropriate, with a cc to TVA Info. Please keep the same subject line and remove this note when replying. If you need assistance or if this inquiry should be redirected, let us know. Thank you.

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**From:** Robert Rutkowski <r\_e\_rutkowski@att.net>  
**Sent:** Thursday, June 17, 2021 6:33 PM  
**To:** Lyash, Jeff <jefflyash@tva.gov>; TVAINFO <tvainfo@tva.gov>  
**Cc:** keith.abouchar@mail.house.gov  
**Subject:** Retiring the Kingston Coal Plant

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Jeff Lyash, CEO  
Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville TN 37902  
(865) 632-2101  
[jefflyash@tva.com](mailto:jefflyash@tva.com)

Chairman Ryder & Members of the Board  
Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville TN 37902  
[tvainfo@tva.com](mailto:tvainfo@tva.com)

Re: Retiring the Kingston Coal Plant

Dear Gentlemen:

This week, the Tennessee Valley Authority (TVA) announced its intent to prepare an Environmental Impact Statement (EIS) for the retirement of the Kingston Fossil Plant in Roane County, Tennessee. Through the upcoming EIS process, TVA will identify the timeline to retire the plant's nine coal units and options for replacement generation.

More than 12 years after one of the worst environmental disasters in U.S. history, the effects of the Kingston coal ash spill continue to have a lasting impact on the community. Those who have remained have focused on building a safe and thriving community, reclaiming their legacy through perseverance and resilience.

TVA has a great opportunity with the closure of Kingston to be a leader in clean energy technologies, in re-establishing strong unions, and improving air and water quality for my

children and future generations.

TVA is currently considering replacing the Kingston and Cumberland coal burning plants with new fracked gas plants or solar and storage technologies.

Kingston's history of operational, safety, and environmental problems, as well as the ongoing risk of coal ash contamination to local water resources, have long cast a shadow on the plant. The growing interest by TVA's customers in reliable, cost-effective clean energy investments means that Roane County and the surrounding region is better positioned today than ever to achieve climate and clean energy goals without risky coal or gas plants. TVA must ensure this decision protects public health and our environment, and pays special focus to the communities and workers at the plant, making sure they receive support in the transition to a future without coal in the Tennessee Valley.

Making plans to retire the Kingston coal plant is an opportunity for TVA to transform a troubled relationship by eliminating a cause of deep residual pain while engaging with a community eager for the benefits of clean energy investment.

Yours sincerely,  
Robert E. Rutkowski

cc:  
Legislative Correspondence Team  
Longworth House Office Building  
Washington DC 20515  
[keith.abouchar@mail.house.gov](mailto:keith.abouchar@mail.house.gov)

2527 Faxon Court  
Topeka, Kansas 66605-2086  
P/F: 1 785 379-9671  
E-mail: [r\\_e\\_rutkowski@att.net](mailto:r_e_rutkowski@att.net)

**From:** [Julia Clark](#)  
**To:** [nepa](#)  
**Subject:** Kingston coal plant  
**Date:** Wednesday, June 16, 2021 1:09:32 PM

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Now's just not inappropriate time to be considering such a drastic and desperate move with the economy and the lack of proper representation this country is facing at this time it's poses too much risk to the communities into the people who work very hard every day to try to sustain their families we're just coming out of a oppression in the last thing that we the people need is another oppression and people losing their jobs and putting Tennessee unemployment benefits at risk , family welfare at risk the increase in welfare benefits that it's going to cause in a lack of financial Independence that people are just not trying to recover from please reconsider just now is not a good time.

**From:** [joeschiller8@gmail.com](mailto:joeschiller8@gmail.com)  
**To:** [nepa](#)  
**Subject:** Kingston Steam Plant Closure  
**Date:** Tuesday, June 29, 2021 5:18:33 PM

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TVA's recent decisions to consider closing its coal-fired steam plants, including Kingston, is a welcome, though overdo, change of position. However, it seems TVA favors replacing these coal-fired plants with natural gas plants. TVA talks of implementing lower carbon emission technologies; however, to achieve net zero carbon (even by 2050) TVA needs to be implementing zero emissions technologies. The current scientific consensus is that carbon emissions must end this decade, not three decades from now. President Biden's climate policies acknowledge this scientific consensus and seek to eliminate carbon emissions by 2035. Thus, the TVA's goals of achieving net zero emissions by 2050 are a decade and a half insufficient. The TVA cannot achieve net zero emissions, even by 2050, by building new carbon emitting natural gas plants today. Currently 15 electric utilities have committed to producing 100% carbon free electricity and the majority of those have adopted more aggressive schedules than the TVA ([https://files.wri.org/d8/s3fs-public/styles/1260\\_wide/s3/uploads/clean-energy-02\\_2.png?VersionId=RamOLyR8XtgvG1SaZUaTBPPDLz1lFIC1&itok=8ayEPOQ\\_](https://files.wri.org/d8/s3fs-public/styles/1260_wide/s3/uploads/clean-energy-02_2.png?VersionId=RamOLyR8XtgvG1SaZUaTBPPDLz1lFIC1&itok=8ayEPOQ_))

TVA falsely asserts that new technologies must be developed to achieve net zero emissions by 2050. There is broad consensus that all the necessary technology for accomplishing net zero emissions by 2035 exists. Yes, there will be better, more efficient, and less expensive technology developed as our existing technology is being deployed, but this is no excuse to not deploy what we know will accomplish the task now. Those better solutions that will emerge during the journey are no reason to postpone our departure down this necessary path. Solar and wind combined with storage are already less expensive than coal and nuclear, at least on par with natural gas, and still declining in cost. There is no cost penalty for implementing them on a larger and more ambitious schedule than what TVA outlines in its current plans. To the contrary, the cost risks reside in TVA's current insistence upon holding onto coal longer than needed and replacing it mostly with new natural gas and SMR nuclear plant. Recent analysis by the Union of Concerned Scientists show that proceeding to 100% renewable electricity by 2035 is the least cost option for the USA.

Other electric utility industry leaders share the urgency of the scientists and the Biden administration. A recent report by the Carbon Free Technology Institute ([Pages - default \(carbonfreetech.org\)](https://carbonfreetech.org)) outlines a pathway to carbon free electricity production by the early 2030s. The report is endorsed by The Edison Electric Institute, an investor- owned utility organization, The Clean Air Task Force, and many other corporate, environmental, and think tank organizations. Like the TVA they acknowledge the need for technological innovation to facilitate decarbonization, however, unlike the TVA they do not view this as an impediment to expeditious action now. People who have studied climate change and truly comprehend its implications want action, not distant promises. Global climate change is here now and getting worse by the day. Recent Heat waves and fires in the west are tangible illustrations that TVA dithers while the earth burns. The recent Southern Alliance for Clean Energy [Solar in the Southeast Report](#) documents explicitly how badly TVA lags all but two of its regional peer utilities in the implementation of renewable energy. Parents and grandparents want to be able to sleep at night secure in the knowledge that TVA is

implementing effective actions necessary to provide their children and grandchildren a livable planet. They want to look their children and grandchildren in the eye and honestly assure them “Their future will be alright.” TVA keeps talking about its need to provide stable, low-cost power. Please start talking about how TVA is leading the region and the country in taking the necessary steps to provide our children and grandchildren a safe planet with a stable climate.

Joe Schiller, Emeritus Professor of Biology

Sent from [Mail](#) for Windows 10



**From:** [FRANCES LAMBERTS](#)  
**To:** [nepa](#)  
**Subject:** Public comment: Kingston Fossil Plant Closure, FR Doc. 2021-12693  
**Date:** Friday, July 2, 2021 8:40:33 PM

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July 2, 2021  
Chevales Williams  
NEPA Compliance Specialist  
1101 Market Street, BRC 2C  
Chattanooga, TN 37402

### **Concerns: Kingston Fossil Plant Retirement, FR 2021-12693**

Dear Mr. Williams:

I strongly agree with the TVA decision to close the Kingston Fossil Plant, given its age, the challenge of so many shutdown events every year and, especially, the large environmental damage from coal combustion. The toxic legacy from coal ash, for which, sadly, this plant became a symbol with the spill in 2008, is with us still, endangering our health through air and land and groundwater pollution.

I am very glad that TVA will be closing these coal units, though the indicated maximum time frame for the planned closure – by 2033 – is too long.

We are currently seeing, starkly again, in the heat-wave effects and deaths in the Pacific Northwest, the enormous damage which fossil-fuel burning is wrecking on the climate, thus imperiling our future. The TVA must use the coal-units-closure opportunity to adjust its electricity-generation system in direction of energy efficiency and lessening use, and future electricity generation from renewable, clean-energy sources.

A month or so ago, the International Energy Agency declared that nations must stop approving new fossil projects immediately if we are to avoid the worst impacts of climate change.

The TVA should not, therefore, as now suggested in the capacity-replacement alternatives (A) and (B), in the forthcoming Environmental Impact Statement, build natural-gas plants with associated pipelines. I urge, instead, maximum employment of solar-energy technology as in alternative (C), and/or wind-energy expansion or wind-power purchase, along with demand management, conservation and efficiency-relevant measures, and increased storage capability.

TVA should lead the nation in transforming our energy system, as the urgent need to reign in climate change demands.

As well, in accordance with President Biden’s goal of a fully clean-energy electricity system by 2035, the EIS alternatives should be re-prioritized to not include new fossil fuels.

Thank you for considering my comments.

Sincerely,  
Frances Lamberts, 113 Ridge Lane, Jonesborough, TN 37659

**From:** [chip piller](#)  
**To:** [nepa](#)  
**Subject:** Public comment regarding retirement of TVA Kingston Fossil plant  
**Date:** Wednesday, June 16, 2021 12:24:18 PM

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Hi,

I read an article today June 16, 2021 which said that TVA was requesting public input about the future of the Kingston Fossil plant.

<https://www.wate.com/news/local-news/tva-calling-for-public-input-on-kingston-fossil-plant-retirement/>

My family and I live on a farm a few miles away from the Kingston Fossil plant.

If the wind is blowing a certain direction we can smell the exhaust from the Kingston coal power plant on our farm, even though the plant is using the newer "clean" scrubber smoke stacks.

We know people whose health has been negatively affected by the TV Kingston coal plant. Coal ash storage remains an ongoing problem.

Yes, it is time to retire the TVA Kingston Fossil plant.

I would go further and suggest that retiring the Kingston Fossil plant would be a good first step but the long term plan for the site should be to remove all of the man-made "improvements" and restore the site to it's original natural condition and make the site into a public park or wildlife area.

Regards,

Chip Piller  
Oakdale, TN

**From:** [Sid Abma](#)  
**To:** [nepa](#)  
**Subject:** Tennessee Kingston Power Plant ~ public input  
**Date:** Wednesday, June 16, 2021 2:19:15 PM

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Tennessee Valley Authority

The article I just read stated that you were looking for comments about the proposed closing of the Kingston Fossil Plant.

Why is this coal fired power plant being shut down? Is it because of CO2 emissions? If so then lets deal with the CO2 emissions.

How many families livelihood are dependent on this power plant and industry? If this coal fired power plant were to operate with less CO2 emissions going into the atmosphere than what a natural gas power plant puts out, would this power plant then continue to operate? America needs to be Energy Wise. We have over 500 years of good quality coal that needs to be used to provide 24/7/365 reliable electricity. America has more Btu's in our coal than we have in our natural gas and oil combined.

We would be very pleased to show TVA how the Sidel Carbon Capture Utilization System can affordably keep Tennessee's coal fired power plants operating ~ Profitably.

[https://youtu.be/RQRQ7S92\\_lo](https://youtu.be/RQRQ7S92_lo)

Looking forward to your reply.

**Have A Fantastic Day!**

**Sid Abma** CEO, Sidel Global Environmental

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photo



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