



February 9, 2021

Chairman Ryder & Members of the Board  
Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville TN 37902  
tvainfo@tva.com

**Re: Comments for The TVA Board’s February 11, 2021 Meeting Concerning the Urgent Need for TVA To Align Its Planning Goals with The New Biden Clean Electricity Mandate**

Dear Chairman Ryder and Members of the Board,

On January 27, 2021 President Biden issued an Executive Order calling for the electricity sector to be completely decarbonized by 2035 and directing that the federal government “combat the climate crisis with bold, progressive action [...] from every corner of our Nation.” The Biden Order emphasized that “[i]t is the policy of my Administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy.”<sup>1</sup>

We, the undersigned organizations, submit these comments calling on the Tennessee Valley Authority (“TVA”) to address the fundamental disconnect between President Biden’s new Order and TVA’s current plans. Indeed, TVA just announced plans to build two new fossil fuel plants.<sup>2</sup>

Moreover, the Biden decarbonization mandate is wholly incompatible with the framework TVA set forth in its most recent 2019 Integrated Resource Plan (“IRP”). Accordingly, we call on TVA to immediately initiate a new IRP planning process where the agency must focus its planning on rapid decarbonization by committing to a just transition to 100% clean and renewable energy by 2030.

While the 2019 IRP process gave some lip service to alternatives providing for accelerated deployment of renewables, including carbon-free distributed energy resources (“DER”), none of the alternatives TVA considered confronted the most pressing issue we face: the urgent need for a rapid transition to a renewable energy economy in order to avoid the worst impacts of climate change. Given the most recent climate change science, the significant climate change impacts occurring in TVA’s territory, and the direction the country is taking under the Biden Administration, TVA must change course and commit to doing its requisite part in this necessary energy transition.

---

<sup>1</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>2</sup> See Paradise and Colbert Combustion Turbine Plants Environmental Assessment (Feb. 2021), <https://www.tva.com/environment/environmental-stewardship/environmental-reviews/nepa-detail/paradise-and-colbert-combustion-turbine-plants>.

We look forward to TVA addressing the following suggestions.

**I. TVA should at the very least align its long-term energy planning with President Biden’s goal of decarbonizing the electricity sector by 2035. We believe TVA must decarbonize by 2030.**

Since TVA’s last IRP, there has only been further evidence confirming of the overwhelming body of scientific work that demonstrates anthropogenic climate change is causing immediate, devastating impacts to communities across the country, and that these harms will worsen as greenhouse gas pollution continues to rise. Communities across the country are struggling amidst climatic changes that have long term consequences, threatening ecosystems and biodiversity, public health, and the economy.<sup>3</sup> Communities in the Tennessee Valley and southeast are particularly vulnerable to these harms<sup>4</sup> with the worst impacts disproportionately felt by Black, Brown, Indigenous and other communities of color and low-wealth communities.<sup>5</sup>

In pathways consistent with a 1.5°C temperature increase, global net anthropogenic CO<sub>2</sub> emissions *must reach net zero by around 2050*.<sup>6</sup> The U.S. must commit its fair share to lowering emissions, and that starts with tackling emissions within the electricity sector – nearly 30% of U.S. greenhouse gas emissions.<sup>7</sup>

Consistent with this obligation, President Biden has now issued an Executive Order committing the country to decarbonize the U.S. electricity sector by 2035.<sup>8</sup> President Biden’s plan will invest \$400 billion over ten years in clean energy and innovation, and advance a massive deployment of clean technology to reduce the U.S. building stock’s carbon footprint by 50% by 2035.<sup>9</sup> This includes investments in energy efficiency and on-site clean power generation.

---

<sup>3</sup> USGCRP [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, USA (2018), <https://nca2018.globalchange.gov/>, at Summary Findings, at 25.

<sup>4</sup> *Id.* at 47.

<sup>5</sup> Climate Justice in Rural Southeastern United States: A Review of Climate Change Impacts and Effects on Human Health. Gutierrez, K.S. and C.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>6</sup> IPCC Special Report at Summary for Policymakers, <https://www.ipcc.ch/sr15/chapter/spm/>, at 6 and 14.

<sup>7</sup> U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, EPA.GOV, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks> (last visited Jan. 25, 2021).

<sup>8</sup> *See* Biden Order.

<sup>9</sup> Joe Biden, *9 Key Elements of Joe Biden’s Plan for a Clean Energy Revolution*, JOEBIDEN.COM, <https://joebiden.com/9-key-elements-of-joe-bidens-plan-for-a-clean-energy-revolution/> (last visited Jan. 25, 2021).

TVA ratepayers deserve a utility that embraces this goal and takes bold action to rapidly decarbonize and mitigate further harms brought by climate change.

The Board must therefore align its planning for the next two decades with Biden's directive to reach 100% clean energy by 2035, on behalf of the health and energy rights of the communities it services, and to do its part in tackling the climate crisis and protect the Tennessee Valley as an environment steward. Indeed, we urge TVA to act even more swiftly, and decarbonize by 2030.

## **II. TVA should immediately initiate a new IRP to align itself with federal clean energy goals and map how the utility will reach 100% clean and renewable by 2030.**

To move TVA in the right direction, we urge that you direct TVA Staff to immediately begin a new IRP planning process with this specific objective. TVA's 2019 IRP lacked any firm commitment to phase out fossil fuels and increase clean energy and thus is not suited to addressing future energy demand considering the climate crises. TVA will retire only 17% of its current coal fleet by 2030.<sup>10</sup> Even worse, the 2019 IRP provided that over the next two decades, TVA plans to build as much as 8,600 MW of new fossil fuel capacity but only add between 1,500 and 8,000 MW of solar.<sup>11</sup> Adjacently, TVA has nearly eliminated its energy efficiency programs, putting TVA at the bottom among all other southeast utilities for efficiency savings.<sup>12</sup>

Moreover, the 2019 Report failed to meaningfully consider clean energy alternatives, or justify why the alternatives considered for TVA's energy generation through 2038 – including those that purported to advance DER and other renewables – all would achieve such limited GHG emission reductions in the coming decades. Indeed, under all alternatives considered, TVA *will still be generating more than 34 million tons of CO<sub>2</sub> each year in 2038*. Final EIS at 5-27.

TVA must now move in an entirely different direction. As the nation's largest government-owned power provider, and its overwhelming GHG emissions, TVA must prepare a new IRP that meaningfully details how TVA will rapidly phase out its fossil fuel generation and expedite its transition to relying on carbon-free energy sources—and especially DER.

Every three years TVA begins its IRP review - it is due time, and TVA should use this process as a vehicle to advance Biden's directive. A new IRP is TVA's opportunity to readjust and present a clear path for how the utility will reach 100% clean and renewable energy by 2030.

---

<sup>10</sup> The Sierra Club: Beyond Coal, *The Dirty Truth About Utility Climate Pledges*, COAL.SIERRACLUB.ORG, <https://coal.sierraclub.org/the-problem/dirty-truth-greenwashing-utilities>.

<sup>11</sup> TVA 2019 Integrated Resource Plan, Final IRP at 9-3.

<sup>12</sup> Southern Alliance for Clean Energy, *Energy Efficiency in the Southeast, Third Annual Report*, Jan. 26, 2021, at 10, <https://cleanenergy.org/wp-content/uploads/22Energy-Efficiency-in-the-Southeast22-third-annual-report-2021.pdf>.

**III. TVA’s resistance to rapid decarbonization disproportionately impacts communities of color and low-wealth communities, and the new IRP must prioritize clean energy development that is justice oriented and ensures clean, low-cost, and reliable energy for all.**

The COVID-19 crisis has brought to the forefront that families struggle to stay on top of their utility bills and lack access to reliable and safe electricity.<sup>13</sup> Residents of the Tennessee Valley, especially Black households,<sup>14</sup> experience a disproportionately high energy burden – a symptom of the energy crisis borne of TVA’s power system – which more clean energy, energy efficiency, and a distributed power system, can alleviate. The fact that families are experiencing shutoffs,<sup>15</sup> are exposed to persistent harms from TVA’s fossil fuel dependence and lack access to more clean energy is fundamentally inconsistent with TVA’s mission to provide cheap, reliable, and clean power to all its customers.

Given TVA’s statutory mandate, its customers deserve a utility that will truly serve the public interest and improve their quality of life. As the largest public utility, TVA must step up as a leader and provide immediate relief to all its ratepayers during the COVID pandemic. On top of that, TVA must use this moment to re-examine its focus for long-term planning towards advancing a clean energy system that addresses the socioeconomic and racial inequality facing the communities it serves.

President Biden has prioritized environmental justice in his recent Executive Order<sup>16</sup>, and TVA must as well. TVA should commit to a *just* transition to 100% clean and renewable energy by 2030 by maximizing distributed and decentralized structures and ensuring union labor.

\* \* \*

While TVA has lowered its GHG emissions in recent decades, reductions from a wholly unacceptable baseline are simply not a meaningful benchmark for progress, and it is indisputable that TVA today remains one of the Nation’s leading emitters of the GHGs that are fueling the climate crisis. Accordingly, the agency has a responsibility to its ratepayers and the Nation to embrace and act rapidly on its clean energy transition.

The IRP process is the appropriate place for this planning, and we urge that you direct that the next IRP begin expeditiously. The way to craft a meaningful alternative in the IRP will be to look at the results we need—*i.e.*, a rapid transition to zero carbon emissions—and map out how TVA can reach that objective within the necessary timetable. President Biden has set an ambitious but necessary goal, and it is

---

<sup>13</sup> Jean Su, *Losing Power in the Time of COVID-19, Climate Change and Racism*, ROSA LUXEMBURG STIFTUNG: NEW YORK OFFICE (Sep. 2, 2020), <https://rosaluxnycblog.org/utility-shut-offs/>.

<sup>14</sup> US Department of Energy, *Low-Income Energy Affordability Data Tool*, ENERGY.GOV <https://www.energy.gov/eere/slsc/maps/lead-tool> (last visited Jan. 25, 2021).

<sup>15</sup> Center for Biological Diversity, *Press Release: Legal Petition Demands Tennessee Valley Authority Halt Electricity Shutoffs, Fund Debt Relief* (Aug. 25, 2020), <https://biologicaldiversity.org/w/news/press-releases/legal-petition-demands-tennessee-valley-authority-halt-electricity-shutoffs-fund-debt-relief-2020-08-25/>.

<sup>16</sup> See Biden Order, Section 219.

CENTER FOR BIOLOGICAL DIVERSITY  
Comments re: TVA IRP and EIS  
February 9, 2021

up to TVA to set the precedent for how utility companies across the country can aggressively decarbonize with justice at the core of this transition. It is due time for TVA to reassess its energy plan and define a roadmap for how it will make a just transition to 100% clean and renewable energy by 2030.

We look forward to participating in TVA's new IRP process. In the meantime, please contact Gaby Sarri-Tobar, (202) 594-7271, [gsarritobar@biologicaldiversity.org](mailto:gsarritobar@biologicaldiversity.org) should there be any further information we can provide.

Sincerely yours,

/s/ Gaby Sarri-Tobar

Gaby Sarri-Tobar

*Energy Justice Campaigner*

Howard Crystal

*Senior Attorney*

**CENTER FOR BIOLOGICAL DIVERSITY**

Daniel Tait

*Chief Operating Officer*

**ENERGY ALABAMA**

Bri Knisley

*TN Field Coordinator*

**APPALACHIAN VOICES**

Michael Hansen

*Executive Director*

**GASP**

Justin Vest

*Executive Director*

**HOMETOWN ACTION**

Duffy-Marie Arnoult

*Co-Chair*

**THE CLIMATE REALITY PROJECT: MID-SOUTH REGIONAL CHAPTER**

Rick Herron

*Hub Coordinator*

**SUNRISE MOVEMENT NASHVILLE**

Duffy-Marie Arnoult

*Co-Chair*

**THE CLIMATE REALITY PROJECT: MEMPHIS CHAPTER**

Rev. Michael Malcom

*Executive Director*

**THE PEOPLE'S JUSTICE COUNCIL**

Kyle Crider

*Program and Policy Director*

**ALABAMA INTERFAITH POWER & LIGHT**

CENTER FOR BIOLOGICAL DIVERSITY  
Comments re: TVA IRP and EIS  
February 9, 2021

Daniel Joranko  
*Climate Project Organizer*  
**TENNESSEE ALLIANCE FOR PROGRESS**

Isabella Killius  
*Organizer*  
**SUNRISE MOVEMENT KNOXVILLE**

Betsy Garber  
President  
**TENNESSEE INTERFAITH POWER & LIGHT**