

September 8, 2022

MLGW

220 South Main Street

Memphis, TN 38103

Delivered electronically to PowerSupply@mlgw.org and corpcomm@mlgw.org

MLGW Board and Staff,

The Southern Alliance for Clean Energy (SACE) is a nonprofit organization that advocates for clean and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. We have more than 4,400 members in Memphis and Shelby County. We have been deeply involved in work with MLGW, with an eye toward helping make energy more affordable and clean, first with the 2017 redesign of the Share the Pennies program, then through MLGW's alternative power supply process, particularly as a member of MLGW's Power Supply Advisory Team (PSAT).

Since our service on the PSAT, we have continued to closely follow the proceeding of MLGW's integrated resource plan (IRP) and request for proposals (RFP) processes, and have weighed in numerous times with comments to the staff and board, to the press, and have done extensive work providing educational materials to our members and the Shelby County community.

MLGW's decision on its future power supply is one of the most consequential single decisions that any community has made in the history of SACE's work throughout the Southeast region over the past three decades. Billions of dollars, millions of tons of pollution, and most importantly hundreds of thousands of individuals' quality of life are on the line with this decision.

Given this significance, it is essential that the MLGW staff and board uphold a high level of diligence and transparency to ensure that the final decision made is in the community's best interest. Part of this duty is meaningfully incorporating public input and diverse perspectives, as MLGW has previously done at several key points in the alternative power supply process.

We appreciate the opportunity to submit public comments following MLGW staff's power supply recommendation given on September 1, but we request that more time be allowed for public comment in order to allow and promote meaningful and effective public participation. Without sufficient time to understand and react to the material shared on September 1, the public comment period may act as a mere formality in a functionally predetermined decision.

As a specific example of why more time is needed, SACE requested clarifying information from MLGW staff on GDS' analysis presented on June 9 more than 40 days ago, and while the request has been acknowledged our questions remain unanswered. Without MLGW providing forthcoming and transparent answers to fundamental questions informing the analysis, the public is held back from submitting informed public comments in an effective way that actually helps inform any eventual decision in a manner necessitated by the enormity of the decision's impacts.

Rather the public must have both forthcoming and transparent information about MLGW's analysis and enough time to understand and respond to that information. Subsequently, MLGW must allow plenty of time to review and respond to the public input received.

We respectfully request that the official comment period be extended to a minimum of 60 days after the September 1 presentation, including a minimum of 30 days after MLGW staff provides answers to clarifying questions about the June 9 and September 1 presentations to help public input shape outcomes that best benefit the community.

Thank you for your consideration.

Stephen Smith
Executive Director,
Southern Alliance for Clean Energy

Cc:
Memphis Mayor Jim Strickland
Memphis City Council