

**BEFORE THE  
TENNESSEE VALLEY AUTHORITY BOARD OF DIRECTORS  
KNOXVILLE, TENNESSEE**

IN RE: )  
TENNESSEE VALLEY AUTHORITY ) Docket No. PPLPWR-11-2023<sup>1</sup>  
2024 INTEGRATED RESOURCE PLAN AND )  
ENVIRONMENTAL IMPACT STATEMENT )

**PETITION TO INTERVENE AND  
REQUEST FOR PUBLIC HEARING**

Energy Alabama, Appalachian Voices, Southern Alliance for Clean Energy, Center for Biological Diversity, Vote Solar, and Green Workers Alliance, collectively and as separate organizations, by and through their undersigned representatives, do hereby file this Petition to Intervene in the above-styled proceeding<sup>2</sup> and request the scheduling of a public hearing to allow for meaningful public comment and input into the Tennessee Valley Authority (TVA) scoping, study, and development of the TVA 2024 Integrated Resource Plan and Environmental Impact Statement.

1. Each of the Petitioners, Energy Alabama, Appalachian Voices, Southern Alliance for Clean Energy, Center for Biological Diversity, Vote Solar, and Green Workers Alliance, is a not-for-profit organization operating in the TVA service area. Each of the Petitioners has members who reside in, or operate businesses within, the TVA footprint and, therefore, are served by local utilities who purchase power generated by TVA. The mission, office location, and other relevant information about each Petitioner and the interests of its members in this proceeding is set forth in more detail in Paragraphs 32 through 37 (inclusive) and incorporated herein by this reference.
2. Under the Tennessee Valley Authority Act, the Board of Directors of TVA has primary responsibility for decisions and actions of TVA. Specifically, Section 2(g) of the TVA Act<sup>3</sup> includes as duties of the Board the obligation to: “...(B) develop long-range plans to guide [TVA] in achieving the goals, objectives, and policies of [TVA]...” and “...[K] to conduct such public hearings as it deems appropriate on issues that could have a substantial effect on—(i) the electric ratepayers in the service area; or (ii) the economic, environmental, social, or physical

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<sup>1</sup> This is a fictitious docket number created to facilitate this effort to raise awareness that no formal public hearing has been scheduled by the TVA Board of Directors with regard to the IRP Planning process currently underway as described in this Petition.

<sup>2</sup> This Petition has no legal significance in any regulatory proceeding. However, as stated in this Petition the TVA Board of Directors has a statutorily-delineated duty to conduct public hearings on matters such as those more particularly set forth in this Petition. The Petitioners elected to style this as a formal docket intervention to demonstrate the importance of the issues raised herein and the duty of the Board to conduct public hearings thereon.

<sup>3</sup> Codified at 16 U.S.C. §831(g), <https://www.law.cornell.edu/uscode/text/16/831a>, retrieved Oct. 31, 2023].

well-being of the people of the service area...” [Tennessee Valley Authority Act of 1933, 16 U.S.C. §831g<sup>4</sup>.]

3. In testimony before the U.S. Senate Subcommittee on Energy and Water Development, Committee on Appropriations, J. Dexter Peach, Director of the Energy and Minerals Division, U.S. General Accounting Office, stated: “The Congress established and has maintained the TVA Board as the single and final authority on many TVA power activities and decisions related to power planning, ratemaking, and public involvement.” [Testimony by J. Dexter Peach, Director of Energy and Minerals Division, U.S. Governmental Accounting Office, before the U.S. Senate Subcommittee on Energy and Water Development, Committee on Appropriations, April 17, 1982 <https://www.gao.gov/assets/118259.pdf>. Retrieved Oct. 27, 2023.]
4. Accordingly, as established in Paragraphs 2 and 3 above, the Board of Directors of the TVA has the authority and affirmative duty to develop TVA’s long range planning and conduct public hearings on issues that will substantially impact ratepayers and people in the TVA service area, whether those impacts pertain to economics, environmental issues, or the social and/or physical well-being of everyone in the TVA service area. Pursuant to these statutorily defined duties, the Board has the authority and duty to schedule and conduct the public hearing requested by Petitioners hereunder.
5. On May 19, 2023, the Tennessee Valley Authority (TVA) published in the Federal Register its Notice of Intent to begin the process of developing its “next” integrated resource plan (IRP) and the IRP’s related environmental impact statement (EIS). The proposed plan, to be finalized in 2024 according to TVA, is intended to be “a study of how TVA will meet the demand for electricity in its service territory” [Notice of Intent, Tennessee Valley Authority Integrated Resource Plan and Environmental Impact Statement, 88 Fed. Reg. 32265 (May 19, 2023)].
6. As part of the Integrated Resource Plan, TVA is required to and “will prepare a programmatic Environmental Impact Statement (EIS)” that “analyzes significant environmental impacts to the combined TVA power service area and the Tennessee River watershed (TVA region) that could result from the targeted power supply mix studied in the IRP.” [Notice of Intent, Tennessee Valley Authority Integrated Resource Plan and Environmental Impact Statement, 88 Fed. Reg. 32265 (May 19, 2023)].
7. TVA’s Notice of Intent allowed approximately 5 weeks for stakeholders and interested persons to provide “public comment” through the submission of written comments on the “scope of this IRP and EIS.” [Notice of Intent, Tennessee Valley Authority Integrated Resource Plan and Environmental Impact Statement, 88 Fed. Reg. 32265 at 32267 (May 19, 2023)]. The period for filing public comments on the Notice of Intent closed on July 3, 2023.

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<sup>4</sup> Also available through the TVA archives here:

[https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/default-document-library/site-content/about-tva/tva\\_act.pdf?sfvrsn=99c2b8c4\\_0](https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/default-document-library/site-content/about-tva/tva_act.pdf?sfvrsn=99c2b8c4_0) [Retrieved Oct. 27, 2023].

8. TVA imposed multiple, overlapping public comment periods for several key energy projects, further limiting stakeholders ability to meaningfully engage with and comment on the scope of the IRP and EIS. Other comment periods open during all or a portion of the same time as the comment period for the IRP and EIS under the Notice of Intent referenced in Paragraph 7 included the following:
  - a. Kingston Fossil Plant Retirement Draft EIS  
[\[https://www.govinfo.gov/content/pkg/FR-2023-05-19/pdf/2023-10672.pdf\]](https://www.govinfo.gov/content/pkg/FR-2023-05-19/pdf/2023-10672.pdf);
  - b. Solar and Battery Programmatic EIS  
[\[https://www.federalregister.gov/documents/2023/05/19/2023-10654/solar-and-battery-programmatic-environmental-impact-statement\]](https://www.federalregister.gov/documents/2023/05/19/2023-10654/solar-and-battery-programmatic-environmental-impact-statement);
  - c. Cheatham County Generation Site EIS  
[\[https://www.federalregister.gov/documents/2023/05/19/2023-10651/cheatham-county-generation-site-environmental-impact-statement\]](https://www.federalregister.gov/documents/2023/05/19/2023-10651/cheatham-county-generation-site-environmental-impact-statement);
  - d. and a Pumped Storage Hydro Programmatic EIS  
[\[https://www.federalregister.gov/documents/2023/05/19/2023-10653/pumped-storage-hydro-programmatic-environmental-impact-statement\]](https://www.federalregister.gov/documents/2023/05/19/2023-10653/pumped-storage-hydro-programmatic-environmental-impact-statement).
9. TVA also provided for extremely limited public participation in two scoping presentation meetings held on May 23, 2023 and June 7, 2023. Based on a review of the recordings of these two scoping presentations, public engagement during those presentations was limited to “clarifying questions.” The scoping presentations were merely opportunities for TVA staff to explain the IRP process that TVA would follow, provide instructions for how to submit comments on the Notice of Intent, and answer questions about the process. Based on the video recordings published on the TVA’s web page dedicated to the Integrated Resource Plan, no public input was taken during the scoping meeting presentations. [Source: <https://www.tva.com/environment/environmental-stewardship/integrated-resource-plan>. Retrieved Oct. 5, 2023.]
10. The formation of an “IRP Working Group” was announced by TVA earlier in 2023 . That IRP Working Group has held three meetings thus far based on publicly available information as of October 31, 2023. The first meeting was held on July 17-18, 2023, two weeks after the Notice of Intent comment period closed. The second meeting was held on August 28-29, 2023. The third meeting was held on Sept. 25-27, 2023. We believe a meeting may have been held in late October 2023 but that information is not yet publicly available. [Source: <https://www.tva.com/environment/environmental-stewardship/integrated-resource-plan>. Retrieved Oct. 27, 2023.]
11. TVA’s formation of the IRP Working Group purports to be an opportunity for “stakeholder engagement” to provide input to TVA’s IRP planning team. However, participation in the IRP Working Group appears to be limited to certain individuals selected by TVA staff, rather than the Board of Directors, and the number of participants is limited to 24 individuals, including the facilitator who is a TVA employee. Petitioners have been unable to locate any publicly available resource that would inform an interested person as to how the IRP Working Group membership

is selected nor how to apply if a person wanted to be considered for service as a member the IRP Working Group.

12. Publicly available summaries from the IRP Working Group meetings indicate the working group has been convened, thus far, to simply offer comments on plans already under development by TVA. For example, rather than engaging the IRP Working Group to develop energy resource strategies and scenarios for study and modeling, the summary of the first IRP Working Group meeting states, “the TVA team spent weeks developing possible 2024 IRP alternative scenarios for the IRP Working Group to consider.” It’s interesting to note that there were only two weeks between the closing of the period for public comments on the Notice of Intent and the first meeting of the IRP Working Group. Thus, the TVA staff prepared its TVA-preferred scenarios long before the opening of the public comments period under the Notice of Intent. This timing would indicate that public comments were not taken into account in any way at all by TVA staff developing the energy resource strategies or scenarios. The notes from the Working Group’s first meeting provide no indication that any meaningful alternatives to the TVA-produced scenarios were adopted. The Working Group’s input was merely solicited to “strengthen the initial work” [TVA Working Group Meeting 1 Summary, [https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/environmental-stewardship/integrated-resource-plan/2024/working-group-meeting-1-summary.pdf?sfvrsn=8d8f0369\\_1](https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/environmental-stewardship/integrated-resource-plan/2024/working-group-meeting-1-summary.pdf?sfvrsn=8d8f0369_1) Retrieved Oct. 3, 2023.]
13. Petitioners believe that the process followed by TVA in developing the 2024 IRP and EIS is flawed and is not conducted in the best interests of the “public” intended by federal law to be served by TVA.
14. Petitioners believe that TVA’s IRP and EIS process is self-regulated, directed by its management, not its Board of Directors as required by the aforementioned Tennessee Valley Authority Act and, therefore, not subjected to meaningful oversight by any governmental or regulatory authority as required by law.
15. TVA’s IRP and EIS process is not transparent. There is no publicly-available list of Working Group members. Agendas are not posted before meetings. There is no public comment opportunity at Working Group meetings, nor are these meetings open to the public. To the extent that information is made available to the public, such information consists of perfunctory summaries of decisions made, rather than the data and models that are used in the development of initial and final energy resource strategies and scenarios.
16. In comments at the beginning of the Public Scoping Meeting held by TVA on May 23, 2023, Brian Child, TVA’s Vice President of Enterprise Planning, cited rapidly changing market conditions, more stringent regulations and advances in technology as the forces that necessitated beginning the IRP process a year early. [Source: TVA Video available here: [https://players.brightcove.net/605538292001/default\\_index.html?videoId=6329036457112](https://players.brightcove.net/605538292001/default_index.html?videoId=6329036457112)].<sup>5</sup> Notwithstanding these rapidly changing conditions, rather than pausing the buildout of

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<sup>5</sup> The relevant portion of Mr. Child’s remarks begin at approximately 5:38 in the video timeline.

more fossil-generated facilities, TVA is rapidly advancing nearly 6,000MW in new gas power plants under outdated planning under the previous 2019 IRP. In light of the rapidly changing conditions acknowledged by Mr. Child, TVA's decision to undertake new major energy infrastructure should be paused until the conclusion of the 2024 IRP process and reconsidered in light of the final 2024 IRP and EIS.

17. In an effort to increase transparency and opportunities for public participation in the IRP process, in June 2023 nine organizations sent a letter to the TVA Board of Directors outlining steps for greater public engagement in the 2024 IRP process. Five of the organizations who signed on to that letter are Petitioners in this proceeding.  
<https://www.cleanenergy.org/wp-content/uploads/Letter-to-TV-Board-Process-Recommendations-for-2024-IRP.pdf>
18. On August 22, 2023, TVA's Executive Vice President, General Counsel and Corporate Secretary David B. Fountain sent a letter of response to the letter described in Paragraph 17 above ("Response Letter"), purporting to be on behalf of the Board of Directors. Although Mr. Fountain serves as Board Secretary, he is not one of the TVA Board Members appointed by the U.S. President and confirmed by the U.S. Senate.  
[https://www.cleanenergy.org/wp-content/uploads/Board-Response\\_NGO-Letter\\_final-dbf.pdf](https://www.cleanenergy.org/wp-content/uploads/Board-Response_NGO-Letter_final-dbf.pdf)
19. In the Response Letter, Mr. Fountain reiterated several standard talking points about TVA's commitment to carbon emissions reduction and its intent to eventually become a zero carbon utility.
20. In the Response Letter Mr. Fountain appears to take the position that the IRP process established pursuant to the Energy Policy Act of 1992 ("EPA92") somehow negates the duties of the Board of Directors under the Tennessee Valley Authority Act with regard to its duty to hold public hearings (see Paragraphs 2, 3 and 4 above). Mr. Fountain identifies a variety of non-IRP councils, listening sessions, and utility association meetings, none of which offer meaningful opportunity for public participation and do not directly inform the IRP process.
21. In the Response Letter, Mr. Fountain cites the public comment periods relating to the IRP EIS as an opportunity for public engagement. However, the comment period for the draft and final EIS do not impact the defining of scenarios and modeling that drive the ultimate IRP that will determine the future of all lives and businesses in the Tennessee Valley territory. By the time the comment period opens for the draft EIS, the scenario planning and modeling will have been completed.
22. Mr. Fountain concludes his Response Letter by providing the timeline of public comment periods during the IRP process. As noted throughout this Petition, the Petitioners believe the public comment opportunities during the IRP process are non-substantive and effectively meaningless in terms of actual public input and are insufficient for the Board to fulfill its duty to hold public hearings as described in Paragraphs 2, 3 and 4 of this Petition.

23. TVA's internal IRP planning team develops and provides for comment the strategies and scenarios to be considered by the IRP Working Group, rather than developing resource strategies and scenarios based on substantive and in-depth commentary and guidance offered by stakeholders such as the Petitioners. Once the resource strategies and scenarios are set by the IRP planning team there is no meaningful opportunity for the public to influence or change the strategies and scenarios, nor the draft IRP or draft EIS.
24. There is insufficient evidence that TVA's internal IRP planning team and TVA management incorporate the full costs of continued reliance on fossil fuels in the development of its energy resource strategies, scenario modeling and the risks associated with global commodities market pricing with continued reliance on methane gas, in particular. In the 2019 IRP, TVA failed to take into account the cost of stranded assets that will be incurred in future years due to continued reliance on coal, methane and other fossil gas resources in electricity generation.
25. In the 2019 IRP, TVA's IRP planning team and TVA management failed to consider the lower costs of new photovoltaic solar and storage technologies and the opportunities to deploy these technologies on the sites of former fossil generating facilities or other properties (including water) and already-built surfaces (like parking lots and buildings) that are already owned by TVA.
26. TVA has repeatedly failed to take into account federal incentives available to TVA under the Inflation Reduction Act (2023) and/or Infrastructure Investment and Jobs Act (2022) in other NEPA analyses, such as for replacing capacity at retiring coal plants.
27. In the 2019 IRP and other NEPA analyses, TVA failed to take into full account the benefits of encouraging residential and business rooftop solar installations, which are now heavily incentivized under the Inflation Reduction Act.
28. In recent NEPA analysis for replacing the capacity at retiring coal plants, TVA failed to consider the role of energy efficiency and demand response as pathways to reduce the need for new fossil generation facilities and also lower ratepayer energy costs.<sup>6</sup>
29. The timeline put forth by TVA does not provide for any public comment on the energy resource strategies and scenario modeling. Instead, the modeling may have already begun or is about to begin. The next official opportunity for any type of public comment will be on the draft IRP and EIS, expected to be released in March 2024. At that point, it will be too late for meaningful public engagement on the substance of the energy resource strategies and modeling that were used in developing the draft IRP and draft EIS.
30. The TVA Integrated Resource Plan 2024 Scoping Report ("Scoping Report") was publicly released on October 31, 2023. Detailed guidelines under the headings of "Transparency" and

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<sup>6</sup> See, e.g., EPA comments on Cumberland Fossil Plant Retirement Final EIS available here: <https://cdxapps.epa.gov/cdx-enepa-II/public/action/eis/details?eisId=385821> [Retrieved Nov. 1, 2023.]

“Engagement” can be found on page 9 of the Scoping Report.<sup>7</sup> One of the guidelines specifically states: “**Stakeholders should be able to intervene in the IRP process.** TVA should provide a way for stakeholders to submit comments and information requests after scoping and during the early planning period (until the publication of the draft IRP. **Also recommend TVA’s Board of Directors hear directly from stakeholders.**” [TVA Integrated Resource Plan 2024 Scoping Report, page 9,<sup>8</sup> emphasis added.] Other guidelines found on this page of the Scoping Report can be summarized as describing the mechanisms and pathways that will enable “robust public participation and stakeholder engagement.”<sup>9</sup> This language on page 9 of the 2024 Scoping Report demonstrates further public support for the requests made by the petitioners in this motion. The TVA Board must grant this Petition, allow the Petitioners to Intervene, schedule the Petitioners’ requested public hearing, and allow Petitioners and other stakeholders to participate in that public hearing as described in Paragraph 39 hereof.

31. Each Petitioner has a direct and substantial interest in the TVA’s 2024 IRP planning process and the development of the 2024 IRP EIS which cannot be represented adequately by any other party.
32. Energy Alabama is a membership-based nonprofit organization accelerating Alabama’s transition to sustainable energy. Many of its members reside or operate businesses in the TVA service territory and, therefore, are TVA ratepayers through their local utility. Energy Alabama’s mailing address is P.O. Box 1381, Huntsville, AL 35807. Energy Alabama accomplishes its mission by educating, informing smart energy policy, and building the next generation workforce. Energy Alabama is engaged in advocacy for public policy that will hasten the adoption of clean energy technologies for the production of electricity and the more rapid retirement of fossil fuel power generation facilities owned and operated by TVA. Energy Alabama advocates for public policy and outcomes that lower the costs of electricity paid by ratepayers whose local utility company purchases its power from TVA. Energy Alabama advocates for policies and programs to promote energy efficiency in homes, business operations, and in the electricity generating facilities owned and operated by TVA. Accordingly, the proposed IRP and EIS would directly and substantially impact Energy Alabama’s advocacy efforts and the interests of its members regarding expanding and diversifying access to affordable clean energy and related issues affecting the electric power system in the TVA region. Energy Alabama, therefore, has a substantial interest in this proceeding (TVA’s IRP and EIS process), which cannot be represented adequately by any other party. Energy Alabama’s participation in this proceeding is in the public interest.
33. Appalachian Voices is a regional nonprofit organization that works to protect the land, air and water of Central and Southern Appalachia and to advance a just transition to a generative and equitable clean energy economy. Appalachian Voices has staff and members in the Tennessee

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<sup>7</sup> Page 9 of the Report can be found on Page 15 of the PDF version available here: [https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/environment/environmental-stewardship/integrated-resource-plan/2024/2024-irp-scoping-report-10-26-23.pdf?sfvrsn=e8adae8b\\_1](https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/environment/environmental-stewardship/integrated-resource-plan/2024/2024-irp-scoping-report-10-26-23.pdf?sfvrsn=e8adae8b_1).

<sup>8</sup> Id.

<sup>9</sup> Id.

Valley Authority service area, and works with community groups throughout the TVA footprint to help them engage in energy utility decision making both at TVA and with local distribution power companies. Some of these community groups include ratepayers who are directly affected by TVA's coal ash storage, existing utility infrastructure and proposed utility infrastructure, including proposed CT and CC gas plants and pipelines. "Energy Democracy" is the process of centering impacted community members in energy planning and decision making in the energy transition and is a key objective in Appalachian Voices' organizational goals. Appalachian Voices works with ratepayers and community groups throughout the TVA region to facilitate their engagement with TVA listening sessions, public comment periods for NEPA documents produced by TVA, and planning at the local utility level. TVA's energy planning impacts local environmental quality, energy affordability, energy security and jobs for Appalachian Voices' members and the communities we support. The proposed IRP will guide TVA's energy planning through 2050. TVA's current IRP planning process does not offer a formal public hearing space for community members or advocates to provide input on the ongoing IRP study outside of NEPA comment periods. Therefore, Appalachian Voices has a direct and substantial interest in this proceeding.

34. The Southern Alliance for Clean Energy (SACE) is a regional nonprofit organization whose mission is to promote responsible and equitable energy choices to address the impacts of global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members, including members within the TVA footprint, are interested in promoting greater reliance on clean energy resources to meet the Southeast's energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region, and actively participates in utility-sponsored energy efficiency and demand-side management stakeholder collaborative meetings. SACE also promotes clean energy solutions such as energy efficiency, solar energy and wind energy through education and outreach in order to improve public health, the environment and the economy. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, TN 37901, and also has offices in North Carolina, South Carolina and Georgia. SACE and its members are interested in promoting greater reliance on energy efficiency and renewable energy and reducing carbon dioxide emissions by electric utilities throughout the Tennessee Valley. Moreover, SACE's members who receive electricity service at their homes and businesses from the utilities operating in the Tennessee Valley will be affected by the resource decisions resulting from this IRP process. SACE and its members have a direct and substantial interest in this proceeding.
35. The Center for Biological Diversity is a national nonprofit conservation organization with more than 1.7 million members and online activists who care about the country's urgent need to expedite the renewable-energy transition and protect human health, the natural environment, and species from the ravages of the climate emergency, extinction crisis, and environmental degradation. The Center advocates for wildlife and wild places through legal work, scientific research, and community organizing. The Center regularly collaborates with federal, state, and local governments, as well as public and private organizations, to advance its mission. The Center for Biological Diversity and its 9,000 members throughout the Tennessee Valley are interested in advancing a just transition to renewable energy for TVA and protecting biodiversity which is

increasingly threatened by fossil fuels and the climate emergency. For years, the Center has been actively engaged in advocacy concerning TVA, including participating in TVA's planning processes for its future energy generation needs. The Center specifically promotes energy efficiency and distributed, renewable energy solutions such as rooftop and community solar and storage to decarbonize the utility sector. The Center simultaneously challenges the continued expansion of fossil fuels in the region, such as replacing the Cumberland and Kingston coal plants with fossil gas. Accordingly, the proposed IRP and EIS would directly impact the Center's advocacy and the interests of its members to protect species, communities, and tackle the climate emergency. The Center therefore has a substantial interest in the proceeding.

36. Vote Solar is a nonprofit advocacy organization dedicated to expanding access to affordable, renewable energy - particularly solar energy- through local, state, and federal policies. Vote Solar has more than 110,000 members nationwide, including members who receive electrical service through TVA's system. Vote Solar is headquartered at 2201 Broadway, Fourth Floor, Oakland, CA 94612. Vote Solar has members who are customers of TVA and are therefore subject to the direct impacts of the IRP. Vote Solar has intervened in many IRP's across the nation, and has firsthand experience with the impacts that an IRP can have on its member's ability to access bill saving renewable energy technology. Vote Solar intends to intervene to ensure that Vote Solar members' interests in advancing energy affordability and promoting access to solar energy and other distributed energy resources are represented. Therefore, Vote Solar has a direct and substantial interest in this proceeding.
37. The Green Workers Alliance (GWA) is a national workers' organization that mobilizes for more and better jobs in the utility-scale renewable energy field. GWA has members in the Tennessee Valley Authority service area who work on utility-scale wind and solar projects. TVA's energy planning impacts jobs for GWA members who live and work in the region. GWA has members who live and work in the service area of TVA and are therefore subject to the direct impacts of the IRP. Increased renewable energy deployment substantially and positively impacts their work lives. Therefore, GWA has a direct and substantial interest in this proceeding.
38. Each Petitioner hereby requests that simultaneously with the grant of this Petition to Intervene that this matter be set for a People's Public Hearing as soon as reasonably practical in Nashville, Tennessee to allow meaningful public engagement, participation, comment, input into the TVA 2024 IRP and EIS and allow stakeholders to submit comments and make information requests related to the 2024 IRP and EIS.
39. This Petition and Request for a Public Hearing is supported by numerous other organizations and individuals who also have a substantial interest in this proceeding and may seek to attend, engage, offer comments, and make requests at the requested Public Hearing.

Respectfully submitted this 1st day of November, 2023.

/s/Daniel Tait  
Executive Director  
Energy Alabama  
Mailing Address:  
P.O. Box 1381  
Huntsville, AL 35807  
Phone: (256) 812-1431

/s/Brianna Knisley  
Director of Public Power Campaigns  
Appalachian Voices  
Mailing Address: 589 W King Street  
Boone NC, 28607  
Phone: (865) 212-0691

/s/Bryan Jacob  
Solar Program Director  
Southern Alliance for Clean Energy  
Mailing Address:  
P.O. Box 1842  
Knoxville, TN 37901  
Phone: (865) 637-6055

/s/Gaby Sarri-Tobar  
Energy Justice Campaigner  
Center for Biological Diversity  
Mailing Address:  
1411 K St. NW Suite 1300  
Washington, DC 20005  
Phone: (202) 594-7271

/s/Jake Duncan  
Southeast Regulatory Director  
Vote Solar  
Mailing Address:  
2201 Broadway, Fourth Floor  
Oakland, CA 94612  
Phone: (415) 817-5060

/s/Matthew Mayers  
Executive Director  
Green Workers Alliance

Mailing address: 1833 Ontario Pl NW  
Washington, DC 20009  
Phone: (202) 316-1888

IN RE: )  
TENNESSEE VALLEY AUTHORITY )  
2024 INTEGRATED RESOURCE PLAN AND )  
ENVIRONMENTAL IMPACT STATEMENT )

Docket No. PPLPWR-11-2023

**ORDER**

**IT IS HEREBY ORDERED AND DECREED** that the Petition to Intervene in the TVA 2024 Integrated Resource Plan and Environmental Impact Statement filed by Energy Alabama, Appalachian Voices, Southern Alliance for Clean Energy, Center for Biological Diversity, Vote Solar, and Green Workers Alliance is granted.

**IT IS FURTHER ORDERED AND DECREED** that the Petitioners Request for a People’s Hearing is granted.

**IT IS FURTHER ORDERED AND DECREED** that the above-styled Docket is set for \_\_\_\_\_(day), \_\_\_\_\_ (month), \_\_\_\_\_ (year) at \_\_\_\_\_ .m. in Nashville, Tennessee. The location of said hearing shall be announced no later than \_\_\_\_\_, 2023.

ENTERED this \_\_\_\_\_ day of \_\_\_\_\_, 2023

\_\_\_\_\_  
Authorized Representative of the Board of Directors of  
Tennessee Valley Authority