

Via electronic submission to
TVA's NEPA Website
<http://www.tva.gov/nepa>

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**RE: TVA 2018 Rate Change Draft Environmental Assessment – Request
for Comment Period Extension and Public Hearing**

Dear Mr. Higdon:

On behalf of the Southern Alliance for Clean Energy, Southern Environmental Law Center, Appalachian Voices, Energy Alabama, Statewide Organizing for Community eMpowerment and the TN Chapter of the Sierra Club (Groups), we request that the Tennessee Valley Authority (TVA) extend its public comment period for its 2018 Rate Change Draft Environmental Assessment (Draft EA) to a total of ninety (90) days in order to provide adequate time for informed public engagement and to comply with requirements of the National Environmental Policy Act (NEPA).¹ The Groups also request that TVA hold a public hearing as part of its NEPA public engagement process around the Draft EA. The Groups make these requests for the following reasons:

1. The current thirty (30) day comment period is inadequate to allow for public review and analysis of the potential impacts of proposed actions outlined in TVA's 2018 Rate Change Draft EA. The fact that the comment period for the 2018 Rate Change EA overlaps with the open comment period for scoping

¹ "Procedures for Compliance with the National Environmental Policy Act," Tennessee Valley Authority; *See* 45 Fed. Reg. 54, 511 (August 15, 1980); 47 Fed. Reg. 54,586 (December 3, 1982); 48 Fed. Reg. 19,264 (April 28, 1983); stating "The type of and format for public involvement would be selected as appropriate to best facilitate timely and meaningful public input to the EA process." (Section 5.3.2 Public Participation in EA Preparation).

comments related to TVA's 2019 Integrated Resource Plan makes the 30 day comment period for the Draft EA all the more inadequate.

2. TVA serves almost 10 million electric customers across a seven-state service territory. The proposed actions outlined in the 2018 Rate Change Draft EA will affect each of these electric retail customers individually and each proposed alternative has the potential to significantly impact both public health and the environment. TVA must hold at least one public hearing, and ideally several public hearings considering the breadth of TVA's service territory, in order to meet the public engagement requirements of NEPA.

For the aforementioned reasons, we respectfully request that TVA extend the public comment period to allow a total of 90 days for public comment and hold a public hearing to ensure there is adequate time to provide meaningful input on this important, public health issue.

Respectfully submitted by,



Angela Garrone
Energy Research Attorney
Southern Alliance for Clean Energy

On behalf of:
Southern Alliance for Clean Energy
Southern Environmental Law Center
Tennessee Chapter of the Sierra Club
Statewide Organizing for Community eMpowerment
Appalachian Voices
Energy Alabama