

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Tennessee Gas Pipeline Company, LLC) Docket No. CP22-493-000

**MOTION FOR LEAVE TO INTERVENE
OF
TENNESSEE VALLEY AUTHORITY
AND COMMENTS IN SUPPORT**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (Commission), 18 C.F.R. § 385.214 (2021), Tennessee Valley Authority (TVA) hereby submits this motion for leave to intervene and provide comments in the above-captioned proceeding.

I. Intervention

1. Communications concerning this motion should be addressed as follows, and the following individuals should be included on the official service list in this proceeding:

Valerie J. Crockett
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2. On July 22, 2022, Tennessee Gas Pipeline Company, LLC (Tennessee) submitted an application (Application) for a certificate of public convenience and

necessity to construct, install, modify, operate, and maintain certain pipeline facilities located in the state of Tennessee, referred to as the Cumberland Project.

3. TVA is a wholly-owned corporate agency and instrumentality of the United States of America, organized and existing pursuant to the Tennessee Valley Authority Act, *as amended*, 16 U.S.C. §§ 831-831ee (2018) (TVA Act). Pursuant to the TVA Act, TVA produces and sells electric power at wholesale to 153 municipal and cooperative distributors for resale to their customers. TVA also supplies power directly at retail to industrial customers having very large or unusual loads and to several Federal Government facilities. TVA power serves over 9 million people in an 80,000 square mile area in parts of Alabama, Georgia, Kentucky, Mississippi, North Carolina, Tennessee, and Virginia. As part of its daily dispatchable power generating system, TVA currently owns and/or operates 87 combustion turbine generating units at nine sites and 14 combined cycle generating units at eight sites for a summer net capability of over 12,000 megawatts of gas-fired generation and comparable net winter capabilities. In order to fire the turbines to generate electricity, TVA utilizes the services of several interstate gas pipelines and storage companies, including Tennessee.

4. TVA is therefore an interested party within the meaning of Section 15(a) of the Natural Gas Act, and its intervention and participation will be in the public interest. TVA submits that its interests cannot be adequately represented by any other party to this proceeding.

II. Comments in Support

In support of this Application, TVA supports the proposed project as it is necessary to provide natural gas supply to TVA's proposed retirement and replacement of the existing coal fired Cumberland Fossil Plant in Stewart County, TN (Cumberland

Project) with a natural gas fired, 1,450-megawatt combined cycle power plant at the same site, subject to the completion of TVA's environmental reviews and final executive approval of its Cumberland Project. TVA's proposed Cumberland Project would provide low-cost, reliable, and cleaner energy to the TVA power system, and provide the flexibility to reliably integrate 10 GW of solar onto the system by 2035. The combination of TVA's proposed actions to retire and replace the existing coal generation would increase fuel efficiency and further reduce TVA's carbon footprint.

III. Conclusion

WHEREFORE, TVA respectfully requests that FERC grant it leave to intervene and admit it as a party in this proceeding and to accept its comments herein.

Respectfully submitted,

/s/ Sherri Collins
Sherri R. Collins
Tennessee Valley Authority
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Counsel for
Tennessee Valley Authority

CERTIFICATE OF SERVICE

In accordance with Rule 2010 of FERC's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2021), I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Knoxville, Tennessee, this 27th day of July 2022.

/s/ Sherri R. Collins
Sherri R. Collins

Document Content(s)

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