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Tennessee Public Utility Commission
502 Deaderick Street
4th Floor
Nashville, TN 37243
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Amicus Brief From SACE On Benefits Of The Jackson Solar + Storage Facility
TPUC Docket #21-00061

Southern Alliance for Clean Energy ("SACE") is a non-profit organization that promotes responsible and equitable energy choices that ensure clean, safe and healthy communities throughout the Southeast. After more than 30 years, SACE remains the only regional organization solely focused on transforming the way we produce and consume energy in the Southeast. SACE has more than 850 members and 26,000 supporters that live in Tennessee who are concerned about reducing emissions that contribute to extreme weather from climate change; creating jobs and economic development in the clean energy sector; and reducing electric bills' burden through effective efficiency programs.

We respectfully submit this *amicus* brief to the docket and appreciate your consideration of our comments.

The Jackson solar + storage project will bring many benefits to the Jackson community. The combination of solar with storage adds a particularly resilient component to the well documented economic and environmental benefits of local solar and the cooperative structure of the project would extend the benefits of solar to businesses for which solar is currently difficult to access.

We respectfully ask the Tennessee Public Utility Commission to issue a declaratory ruling as Jackson Sustainability Cooperative seeks. It is important that the project proceed so that Tennesseans realize the many benefits the project would provide.

Businesses and residents of Jackson stand to benefit from the project through local jobs, tax revenue, economic development and workforce development, and a healthier environment.

The Jackson Project Would Create Local Benefits for the Jackson Community With Jobs, Tax Revenue, Economic Development, and Workforce Development

The local benefits of the Jackson solar + storage project are more than enough to justify its approval. These benefits include direct jobs and local taxes, and go far beyond that to also include local economic development, experience with a model that can be replicated across the state, and cleaner air and water as the solar replaces TVA power from fossil fueled power plants.

The internships and training programs that will be made available in the Jackson community in development and operation of the solar + storage facility have the potential to turn Jackson into a hub for clean energy workforce development. The national goal of decarbonizing the electric grid

by 2035,¹ and even to meet the Tennessee Valley Authority (TVA)'s goal of decarbonizing by 2050,² will require an increase in workers trained in clean energy fields related to solar, energy storage, and energy conservation and management. The most recent *National Solar Jobs Census*³ established that reaching 100% clean electricity by 2035 will require more than 900,000 solar workers in the U.S. -- more than double the projection with current policies and almost four times the U.S. solar workforce from 2020. The experience gained in building this solar + storage facility is experience that is invaluable. As projects like this one are replicated across the state, country, and world, workers that were trained on the Jackson facility will become sought after for this unique experience.

Extreme weather events, such as heavy thunderstorms, rainfall, and flooding, continue to increase in frequency and severity and can lead to more frequent and longer power outages. The ability of the Jackson solar + storage facility to continue to provide power to its members during power outages is a major benefit of the proposed project. This could lead to fewer interruptions in business operations and thus improvements to the local economy and tax base. Advanced manufacturing and computing are businesses that the state would like to attract more of to the state, and they are businesses that could benefit from the resilience provided by the Jackson solar + storage facility.

The Project's Economic Benefits Are Important To Jackson In Particular

The economic development and workforce development opportunity presented by the Jackson solar + storage project could be particularly important for Jackson in specific, where many residents face financial hardships. According to the United Way of Tennessee one in three people living in Jackson's 38301 zip code-- even before the COVID pandemic --lives in poverty and the wages of nearly half of Jackson residents are not living wages, barely covering basic necessities.⁴

The economic issues are amplified looking even closer at the particular part of Jackson where the project is proposed. According to the 2010 Jackson Revitalization Strategy/Community Redevelopment Plan,⁵ the central east district of Jackson, "*has been recognized by Jackson leadership as an integral neighborhood representing the greatest concentration of disadvantage population, depressed housing values, [and] high unemployment.*" The report also notes that median incomes of the area at below \$18,500 per year were about half of the citywide median income and that "*instances of neglect, structural deficiency, and dilapidation in the East Jackson Planning District are significant, frequent, and widespread.*"

It is recognized by the Jackson community that this area has been underinvested in and would benefit from economic opportunities such as the Jackson solar + storage project, which would invest in local neighborhood infrastructure, provide local jobs, contribute tax revenue, and bolster the local major employers who receive the power from the co-op.

The Environmental Benefits of Solar Deployment Are Necessary And In The Public Interest

Clean energy deployment--and specifically solar energy deployment--benefits communities environmentally as well as economically. Public awareness about the severity of the climate crisis

¹ The White House (April 21, 2021). "FACT SHEET: President Biden Sets 2030 Greenhouse Gas Pollution Reduction Target Aimed at Creating Good-Paying Union Jobs and Securing U.S. Leadership on Clean Energy Technologies."

² TVA (May 6, 2021). "TVA Charts Path to Clean Energy Future."

³ The Solar Foundation (May 2021). *National Solar Jobs Census 2020*, page 17.

⁴ Cassandra Stephenson, *Jackson Sun* (Nov. 15, 2019). "United Way report: Nearly half of Jackson households do not make a 'livable' wage."

⁵ Looney Ricks Kiss (August 2010). *Jackson Center City Revitalization Project - District 2*, Pp. 19, 25.

and the need to take immediate action to reduce greenhouse gas emissions is growing. The Intergovernmental Panel on Climate Change (IPCC)'s recent Assessment Report has been widely characterized as a "code red" for climate, noting that extreme weather events are fueled by greenhouse gas emissions and the impacts of global warming will get worse unless there are immediate and large reductions in carbon pollution. For Jackson residents specifically, the impacts of a warming climate could be particularly strong since in the words of the most recent National Climate Assessment, *"lower-income and other marginalized communities have lower capacity to prepare for and cope with extreme weather and climate-related events and are expected to experience greater impacts."*⁶ The immediate and large reductions in greenhouse gas emissions needed to avoid the worst impacts of climate warming necessitate a large buildout of solar and other clean energy resources, such as what the Jackson solar + storage project exemplifies. In addition to its climate benefits, solar energy improves local environmental conditions as it offsets the need to burn fossil fuels and in turn results in cleaner air and water, and thus improves public health.

The Project Represents a New Model For Tennessee Businesses to Access the Benefits of Solar Despite TVA's Limited Solar Options

While there are varying visions for how energy will be produced and consumed in the years and decades to come, one generally agreed-upon constant is that it must be free from carbon emissions. Entities across the country and around the world are evaluating how their energy is produced and consumed, and what measures can be taken to reduce pollution and costs. Solar energy, with its economic and environmental benefits, is an ideal energy source for supplying large portions of our power, and consequently many businesses have made decisions to build or procure solar energy, whether for environmental or economic benefits.

Yet while TVA has set up a program for their largest and most influential customers to take advantage of solar's lower costs and cleaner energy, TVA has also taken strides to limit the ability of smaller customers to invest in solar on their property and be compensated for the services that solar provides to neighbors and fellow customers. To date TVA's program for large customers, the Green Invest program, has worked to meet the needs of large corporations like Facebook and Google, and large utilities serving cities with clean energy goals that are not met with TVA's fossil-fueled power, like Knoxville and Nashville. But TVA's Green Invest program does not fit the needs of the businesses that have evaluated it and other options, and decided their best investment is in a local solar + storage facility that provides benefits across the community.

To help more Tennesseans access the benefits of solar, we need more tools in the toolkit. The innovative model demonstrated by the Jackson solar + storage project is an example of just such an additional tool that would allow more residents to benefit from solar.

In our pressing need to address the climate crisis and bring about local economic benefits, public interest is served by encouraging, rather than discouraging, such innovative models and opportunities for expanded access to the benefits of solar.

In recommending the Public Utility Commission to deny the Applicant's request, and therefore prohibit the project from proceeding, it appears that TVA is taking a similar heavy-handed approach to the Jackson Sustainability Cooperative that it has employed in limiting access to solar in other instances.

⁶ U.S. Global Change Research Program (2018). Fourth National Climate Assessment, Volume II: Impacts, Risks, and Adaptation in the United States. Summary Findings.

Conclusion

The Jackson solar + storage facility will provide environmental, economic, and electricity benefits to its members, the Jackson community, and the state as a whole. As such it is important that the project move forward. It is misleading to characterize this project as out of step with the goals of the state and its primary electricity provider, the Tennessee Valley Authority. While the Applicant is seeking to move this project full of public benefits forward in good faith, TVA appears to be seeking to stop or delay the project, thus denying the many potential benefits the project could bring to the Jackson community. We respectfully ask the Commission to issue a declaratory ruling as Jackson Sustainability Cooperative seeks.

Respectfully submitted,

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