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Via Electronic Mail

September 14, 2015

Re: Comments on the Draft Environmental Assessment for the Tennessee Valley  
Authority's River Bend Solar Project

On behalf of the Southern Alliance for Clean Energy and the Sierra Club (jointly, the Commenters), we submit the following comments on the Tennessee Valley Authority's (TVA) Draft Environmental Assessment (EA) for the proposed River Bend Solar Project located in Lauderdale County, Alabama (Project).

TVA proposes to enter into a Power Purchase Agreement (PPA) with River Bend Solar, LLC (the Company) to purchase the power generated by the 80 MW AC solar facility the Company proposes to build at the project site. Based on the generation resource, the physical location and characteristics of the Project site, its proximity to an existing 161 kV transmission line, and the results of the EIA, the Commenters support this Project as proposed.

As prices for solar photovoltaic (PV) equipment continue to decline, solar energy can and should play a growing role in meeting the electricity needs of the Tennessee Valley. National weighted-average system pricing for utility systems in Q1 2015 was \$1.72/Wdc, a 3% decrease from Q4 2014 and a year-over-year decline of 7%<sup>1</sup>. This decline in the price of PV systems has led to an accompanying decline in PPA prices to the point where utility-scale solar is now cost-competitive with conventional power generation in many locations. The reported price for the proposed Project is \$61/MWh over 20 years, offering an important hedge against expected increases in natural gas and other fuel prices as

<sup>1</sup> Installed costs for a single-axis tracking photovoltaic (PV) solar power facility such as that proposed for the Project were slightly higher than the weighted average, at \$1.80/Wdc in Q1 2015.

<sup>2</sup> See the Southern Alliance for Clean Energy's comments on the TVA 2015 IRP at 15, available at [http://www.cleanenergy.org/wp-content/uploads/SACE-TVA-Draft-2015-IRP-Comments\\_0427153.pdf](http://www.cleanenergy.org/wp-content/uploads/SACE-TVA-Draft-2015-IRP-Comments_0427153.pdf)

well as compliance costs for meeting federal emissions reductions goals over that time period – and ultimately benefitting TVA ratepayers.

The characteristics of the proposed Project adhere to several important best practices in developing cost-effective and beneficial solar power facilities. Most significantly, the Project is sited in one of the best locations for solar in the TVA region. Based on the Tennessee Valley Utility Scale Solar Assessment prepared for the Southern Alliance for Clean Energy in 2014 by Clean Power Research, the site selected for the Project effectively sits within one of the “Top Ten” sites in the TVA region.<sup>2</sup> Muscle Shoals, Alabama, approximately 10 miles Southeast of the project site, had the 2<sup>nd</sup> highest dependable capacity factor for tracking solar facilities (55.55%) of the 26 sites studied, with an on-peak capacity factor of 57.43%. Effectively, this means TVA can be fairly certain that at least 46 MW (of this 80 MW facility) will be delivered during an on-peak hour.

In addition, the Project is sited adjacent to an existing 161 kV transmission line, the Colbert Fossil Plant-Selmer transmission line. To connect the Project to the transmission line, TVA will need to construct an interconnection switching station on the site and a short (likely less than 1,000 foot) transmission line on a 5-acre easement. No needed upgrades to the line beyond these interconnection requirements are identified in the EA. Because the land on which the easement is located is predominantly farmland, little vegetative clearing will be necessary, and vegetative cover on the right-of-way will be restored following construction. The proximity of the Project to the transmission line serves to reduce both the environmental footprint associated with the Project as well as its overall costs.

No significant impacts to the Project site were identified in the EA. The Project site is located in an agricultural district of Lauderdale County, Alabama, where it will have minimal impact on wildlife, water resources, historic sites, roads, and other county facilities. The Project will be built on 645 acres of currently farmed land comprised primarily of federally designated prime farmland and statewide important farmland designated by the state of Alabama, and the farming conversion impact rating of 180 does indicate some potential for adverse impact (as indicated by impact ratings greater than 160). However, as described in the EA, construction and management of the solar facility will not result in land contamination or degradation, and the site can be returned to farming following decommissioning of the Project. Therefore, the Project will not in and of itself result in a permanent loss of farmland.

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<sup>2</sup> See the Southern Alliance for Clean Energy’s comments on the TVA 2015 IRP at 15, available at [http://www.cleanenergy.org/wp-content/uploads/SACE-TVA-Draft-2015-IRP-Comments\\_0427153.pdf](http://www.cleanenergy.org/wp-content/uploads/SACE-TVA-Draft-2015-IRP-Comments_0427153.pdf)

For the reasons outlined above, Commenters support this project and TVA's thoughtful analysis of environmental impacts contained within the Draft EA.

Respectfully submitted,

/s

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