# THE DIRTY TRUTH **About Utility Climate Pledges VERSION 2**

October 2022



# AUTHORS & ACKNOWLEDGEMENTS

#### Authors

Cara Bottorff, Sierra Club Noah Ver Beek, Sierra Club Leah C. Stokes, University of California, Santa Barbara (UCSB)

#### Contacts

Cara Bottorff, cara.bottorff@sierraclub.org Jessica King, jessica.king@sierraclub.org

#### Acknowledgements

We want to thank the donors who generously support the Beyond Coal Campaign, including Bloomberg Philanthropies.

The authors thank the following individuals for their insights and perspectives:

David Pomerantz, Energy and Policy Institute

Matt Kasper, Energy and Policy Institute

Abre' Conner, NAACP

Maggie Shober, Southern Alliance for Clean Energy

Daniela Schulman, University of California, Santa Barbara (UCSB)

Sachu Constantine, Vote Solar

Eric Frankowski, Western Clean Energy Campaign

Sierra Club Beyond Coal Staff

COVER PHOTO: FRANCES DENNY FOR THE LUUPE, THELUUPE.COM

In loving memory of John Romankiewicz.

### **EXECUTIVE SUMMARY**

For the sake of our communities and planet, we must do everything in our power to create a clean, renewable electric grid by 2030. Utilities must lead this transition, but our research shows they are wholly unprepared to do their part. Clean energy is reliable and affordable; electric utilities have no excuse to delay and no time left to waste.

Rapidly cleaning up the electric sector is key to achieving our climate goals. We need electric utilities to retire coal plants, cancel plans to build new gas plants, and accelerate clean energy deployment to achieve 80 percent clean electricity by 2030 and 100 percent clean electricity by 2035. This is in line with the United States' climate commitments and scientific consensus of what is needed for a livable planet.

Many utilities have pledged to clean up their electricity production, but our research shows these promises often amount to little more than greenwashing. In our 2021 report, released a year and a half ago, we analyzed the plans of 77 utilities owned by the 50 parent companies most invested in fossil fuel generation. We found that despite pledges to reduce emissions from many of these companies, most utilities did not have plans that would actually achieve the necessary emissions reductions by 2030.<sup>1,2</sup> This updated report investigates what progress, if any, these utilities made over the last year and a half to turn their pledges into real action. We want to know: have utilities stepped up to meet the challenge and make the changes needed to save lives, reduce costs, and address climate change by transforming our power system?

#### STUDY SCOPE

**50 parent companies** most invested in fossil fuel generation, comprised of **77 operating companies**, that **own half of all remaining coal and gas generation in the US.**<sup>3</sup>

We analyzed their plans, as of July 1st, 2022, to

- **1**. Retire coal
- 2. Not build new gas plants
- **3. Build clean energy** from 2022 through 2030.

Our approach in the second edition of this report is consistent with that of the first. We score utilities based on their plans to retire coal, not build new gas plants, and build clean energy by 2030. Utilities are graded on a scale of 0 to 100, earning points by committing to retire coal and add clean energy and losing points by adding new gas. The original report evaluated electric utility companies' plans and actions as of December 2020.<sup>4</sup> This edition considers their plans and actions as of July 1, 2022.<sup>5</sup>

We evaluated integrated resource plans (IRPs) and major announcements from the 50 dirtiest parent companies and 77 operating companies included in our original study (see appendices for details).<sup>6</sup> These include investor-owned utilities, public utilities (such as the Tennessee Valley Authority), generation and transmission co-ops, and large municipal utilities. These companies provide roughly 40 percent of total US generation.<sup>7</sup>

Our analysis found that over the last year and a half, utilities have made little progress. Most are still not on the path to achieve 80 percent clean electricity by 2030. Of the 77 utilities we studied, nearly half of them (44 percent) made no progress or received a lower score than in our previous report. Overall, the aggregate score for all utilities in our analysis was 21.1, up just 4 points from the previous aggregate score of 17.2.<sup>8</sup> This disappointing inaction occurred despite a tumultuous 18 months of grid reliability crises, blackouts, energy price spikes, and extreme weather events; many of these trace their roots in large part to utilities' stubborn reliance on expensive and unreliable fossil fuels.<sup>9,10</sup>

| Number (%) of companies with scores that since the last report: |                  |          |  |
|---|------------------|----------|--|
| Improved  | Made No Progress | Worsened |  |
| 43 (56%)  | 7 (9%)           | 27 (35%) |  |

Although utilities have dawdled over the year and a half since our inaugural report, calls for a rapid transition to clean energy have only grown louder. These calls recently culminated in the passage of the historic Inflation Reduction Act (IRA), investing nearly \$370 billion in energy and programs to address climate change, making clean energy an easier choice for utilities.<sup>11</sup> Utilities themselves have acknowledged that the IRA will make it easier for them to deploy clean energy and increase energy affordability for customers.<sup>12</sup> Every day utilities delay progress, people across the country are at risk from pollution and increasingly severe climate-driven weather events. These delays will be even more outrageous if a year from now, utilities have failed to embrace the billions of dollars in opportunities provided by the IRA to speed their clean energy transition. We need more than lip service to combat the climate crisis—electric utilities need to make progress towards a clean energy future.

#### **KEY FINDINGS:**

- While electric utilities have pledged to reduce their greenhouse gas emissions, they have made little progress since our first report and still fall far short of what is needed to protect people and the planet.
- We assigned a score to each utility based on its plans to retire coal, build new clean energy, and not build new gas plants. The aggregate score for all companies studied this year was 21 out of 100 — or a D — up just 4 points from the previous study.
- For parent companies with a climate pledge, the aggregate score in our analysis was 23 out of 100, only 2 points higher than the overall aggregate score. This suggests that most utilities' corporate pledges are not translating into action.
- The companies studied account for 69 percent of remaining coal generation in the US. They have committed to retire just 28 percent of their coal generation by 2030.
- About half of the operating companies included in this study, 37 companies, are planning to build new gas plants, totaling nearly 38 GW through 2030. These utilities have actually increased their plans for new gas plants since our last report. This accounts for over half of the total planned gas in the US through 2030.
- The companies in this study plan to add 308 million megawatt hours (MWh) of new wind and solar energy to the grid between 2022 and 2030. This is equivalent to only 24 percent of their current coal and gas generation and is wholly inadequate for a swift transition to a clean grid.
- Of the 77 operating companies studied, 27 received worse scores (35 percent); 43 improved their scores (56 percent); and 7 made no progress (9 percent).



PHOTO: PHOTOGRAPH BY BENJAMIN LOWY/GETTY IMAGES

# A CLEAN ELECTRIC SECTOR REMAINS CRITICAL

#### **KEY FACTS:**

- Rapidly cleaning up the electricity sector is key to achieving national climate goals.
- To put us on a pathway consistent with a 1.5°C future and avoid the worst effects of climate change, by 2030 US utilities need to phase out coal and slash emissions by at least 80 percent from 2005 levels.
- We can transition to clean energy. Multiple pathways exist to cost-effectively achieve 100 percent zerocarbon electricity by 2035.
- A rapid transition to clean energy has the potential to have the greatest positive impact on vulnerable and marginalized communities bearing the brunt of the monetary, health, and environmental costs of our reliance on fossil fuels.

### The Need for a Clean Energy Future

Human-induced climate change has already adversely impacted people, ecosystems, and infrastructure—with vulnerable and historically marginalized communities hit first and worst. The comprehensive Sixth Assessment Report (AR6) from the Intergovernmental Panel on Climate Change (IPCC) makes it clear that we have the tools to switch to clean energy and slash greenhouse gas (GHG) emissions, but time is running out fast.<sup>13</sup>

The scientific consensus is beyond doubt: in order to avoid the worst impacts of the climate crisis, we must cut global greenhouse gas emissions in half by 2030 or we will fail to limit global warming to 1.5°C (2.7°F).<sup>14</sup> Every tenth of a degree of warming profoundly increases harm to people, non-human species, and ecosystems – for example, causing more frequent and severe extreme weather events and increasing species extinction — with disproportionate exposure and impacts to the most vulnerable.<sup>15</sup> To achieve the necessary greenhouse gas reductions, we need a major transition in our energy sector. This includes moving as fast as possible towards 100 percent clean electricity - away from dirty fuels like coal and gas and towards renewables – and using that clean power for widespread electrification. This assessment is echoed by the International Energy Agency's (IEA) landmark net-zero report. In IEA's analysis, developed countries like the US must immediately phase out coal and cancel any planned build out of fossil fuel infrastructure.<sup>16</sup> Additional research found that even using the oil and gas from already developed fields would take us past 1.5°C of warming.<sup>17, 18</sup> A meta analysis of clean energy models looked across 11 studies published since 2020 that "collectively affirm that achieving 80 percent clean electricity by 2030 is feasible, affordable, critical to meeting national climate goals, and deeply beneficial to the economy and public health - all without compromising power system reliability."<sup>19</sup> This adds to a pile of reports looking at the need for a transition to a clean electric sector.<sup>20, 21, 22</sup> If we are to achieve our climate goals, it is imperative that we not expand fossil fuel infrastructure of any kind and that we keep fossil fuels in the ground.

### Support for a Clean Energy Future

The case for a clean energy future continues to build among all sectors. Clean energy remains popular among the public and utilities' largest commercial customers.<sup>23, <sup>24, 25, 26</sup> Market economics increasingly favor renewables over fossil fuels, and the financial sector is calling for more climate transparency.<sup>27, 28, 29</sup> President Biden has responded to strong public support and committed the US to achieving 100 percent clean electricity by 2035, with an important milestone of 80 percent clean electricity by 2030.<sup>30, 31</sup></sup>

States have also strengthened commitments to the clean energy transition since our first report, putting further pressure on electric utilities to deliver emissions cuts.<sup>32</sup> For example, a 2021 bill in North Carolina instructed the state Utilities Commission to "take all reasonable steps" by 2030 to achieve a 70 percent carbon emissions reduction from 2005 levels from Duke's two electric utilities in the state, which serve roughly two thirds of the state's customers.<sup>33, 34</sup> Similarly, at the end of 2021, Nebraska committed to 100 percent clean power.<sup>35</sup> Twenty-one states are now committed to 100 percent clean electricity goals.<sup>36</sup>

"We are at a crossroads. The decisions we make now can secure a liveable future. We have the tools and know-how required to limit warming." – ноеѕимд LEE, IPCC Chair <sup>37</sup>

### Unlocking the Clean Energy Future

Achieving 100 percent clean electricity will not only cut US greenhouse gas emissions by a quarter, it will also unlock emissions reductions in other key sectors.<sup>38,39</sup> As part of the Paris Agreement, the US has an emissions target, known as a nationally determined contribution (NDC), of reducing economy-wide net greenhouse gas pollution by 50 to 52 percent from 2005 levels in 2030.<sup>40</sup> Studies agree the electric sector is key to unlocking ambitious cross-sector emissions reductions. Across an array of research, there is broad agreement that coal must be retired by 2030 and renewables must be deployed at record speed.<sup>41</sup> Models examining pathways to 50 percent economy-wide GHG reduction by 2030 typically rely on the electric sector for 48 to 66 percent of total direct carbon (CO<sub>2</sub>) reductions.<sup>42</sup>

Clean electricity will deliver enormous benefits beyond cutting GHG pollution and fossil fuel use.<sup>43</sup> Fossil fuel plants are often located in overburdened and historically redlined communities, placing the majority of the health and pollution burden from emissions on low-income communities and communities of color.<sup>44, 45, 46</sup> Clean Air Task Force found that retiring all the coal plants in the US would save an estimated 3,000 lives per year due to reduced air pollution.<sup>47</sup> In addition, renewables such as wind and solar, especially when combined with storage and demand response measures, can increase resiliency and reduce the risk of summer blackouts and other energy shortages due to extreme weather, both of which are more likely to occur in Black and Latinx communities.<sup>48,49</sup> As was recently seen in California, solar, battery back ups, and demand response work to keep the grid stable during extreme weather.<sup>50</sup> Meanwhile, gas plants are struggling to operate under extreme hot temperatures, which are becoming more and more common with climate change.<sup>51</sup>

The recently passed Inflation Reduction Act will help our efforts to transition to a cleaner future, with a lineup of provisions aiming to reduce GHG emissions in the electric sector.<sup>52</sup> Based on current modeling, the IRA's provisions put us on a path to up to 81 percent clean power by 2030 and an economy-wide net GHG emissions reduction of about 40 percent.<sup>53, 54, 55</sup> This represents most of the reductions we need to achieve the country's NDC goal of 50 to 52 percent GHG emissions reduction by 2030 relative to 2005 levels. The power sector accounts for the largest share of these potential emissions reductions, highlighting the crucial role of utilities.<sup>56</sup> The IRA and its clean energy provisions will also create millions of jobs, avoid thousands of deaths, and reduce energy costs.<sup>57, 58, 59</sup>

Achieving a 100 percent renewable electricity sector — and obtaining all of its accompanying benefits — will require deploying massive amounts of existing clean energy technologies like wind and solar. Of course, technology on its own will not be enough. We need to overcome political barriers, and electric utilities need ambitious, binding clean energy commitments.

Have utilities in the US stepped up to the plate?



PHOTO: FRANCES DENNY FOR THE LUUPE, THELUUPE.COM

# UTILITIES HAVE MADE LITTLE PROGRESS

#### **KEY FINDINGS:**

- The aggregate utility score has increased only 4 points from a 17 to a 21, a very low D.
- These companies are planning to build massive amounts of new gas plants and not nearly enough clean energy.
- These companies are hanging on to their dirty coal plants, with plans to retire only 28 percent by 2030.

|   | 2021 Report     | 2022 Report                   |
|---|-----------------|-------------------------------|
| Coal generation committed to retire by 2030   | 25%             | 28%                           |
| New gas capacity planned through 2030   | 36 GW           | 38 GW                         |
| % of total US planned gas capacity through 2030 planned by these companies                        | 40%             | 53%                           |
| Planned new wind and solar energy through 2030  | 250 million MWh | 308 million MWh <sup>60</sup> |
| Planned new wind and solar energy through 2030 as a percentage of current coal and gas generation | 19%             | 24%                           |
| Aggregate Score   | 17 (F)          | 21 (D)                        |
| Number of Companies with "A" Scores   | 3               | 4                             |
| Number of Companies with "F" Scores   | 41              | 36                            |

We assigned each utility a score based on its plans in three areas: **1**) commitments to retire coal by 2030; **2**) plans to build gas by 2030; **3**) plans to build or purchase clean energy by 2030. The score is on a scale of 0 to 100, with a utility earning points by committing to retire coal and adding clean energy and losing points by adding new gas. The numeric score determines a company's grade of A to F, shown in the distribution below. A complete methodology can be found in Appendix A.

#### $A \ge 75$ 50 ≤ B < 75 35 ≤ C < 50 17.5 ≤ D < 35 F < 17.5

This report is forward looking. It examines the progress that still needs to be made from this point forward to be on track for 80 percent clean electricity by 2030. One way to think about this approach is like a student's academic grade for a particular class versus their overall grade point average (GPA). Each of our reports is a snapshot of performance, like a semester-long grade. Other analyses, such as a 2020 report released by the Energy and Policy Institute, provide a historical overview, like a GPA.<sup>61</sup> While historical action is important to get us to our goals, what matters most now is that we have plans to achieve our goals from this point forward. This report focuses on the progress utilities still need to achieve to tackle the climate crisis. Unfortunately, utilities have made very little progress since our first report. The aggregate utility score has increased only 4 points from a 17 to a 21, which translates to a very low D.

Forty-three operating companies, about half of the sample, improved in their score by planning to retire more coal, build fewer new gas plants, and/or build more clean energy. On average, however, these companies increased their scores by only 14 points. Of the remaining companies, 27 scored worse than in the first report. The scores for the remaining seven utilities saw no change; these are all utilities that scored O points in the first version of the report and made no progress since. At a time when every company needs to make rapid progress for us to meet our shared goals, this is extremely disappointing.

On the whole, the utilities in this report have plans to retire barely over a quarter of their coal generation, 28 percent, by the end of 2030. Despite having a year and a half to make plans to retire dirty and polluting coal plants, this is only three percentage points higher than the anticipated 25 percent retirement of coal generation found in the first report. Ultimately, this is a far cry from the necessary commitment to retire 100 percent of coal generation by 2030.

#### Figure 1: The Worst Utilities Keeping Coal Online Past 2030



In total, the utilities we studied are planning to build more than 130 gigawatts (GW) of clean energy capacity through 2030. That capacity is capable of generating more than 308 million MWh of clean energy, 23 percent more than they had planned a year and a half ago, and enough to power nearly 30 million households. This increase is even more notable because some of the clean energy planned in the first report, which included plans for 2020 and 2021, has since been built. The current slate of plans propose more clean energy over a shorter time period. While this is an encouraging increase, the generation from the clean energy resources planned by these utilities are only enough to replace 24 percent of their current owned fossil fuel generation, let alone the increased load likely to come from electrification and non-fossil retirements.<sup>62</sup> Utilities must continue to expand their clean energy resources if we are to meet our climate targets and stay below 1.5°C of warming.

Unfortunately, utilities are still moving in the wrong direction by planning new gas capacity. These utilities now have more gas planned to come online through 2030, 38 GW, than a year and a half ago when they had 36 GW planned. If these gas plants come online, they would emit an estimated 86 million metric tons of carbon dioxide equivalent (MMT CO<sub>2</sub>e) each year, equivalent to the annual emissions from over 18.5 million cars - more than all the cars in Texas, Florida, and New Jersey combined.<sup>63, 64</sup> After 2030, when utilities should be well along their path to emissions reductions, 12 of these companies are instead planning to lock themselves into additional emissions by building 14 GW of further gas plants. These plans for gas both before and after 2030 are completely contrary to the progress needed to expand clean energy rather than double down on fossil fuels. Building new clean energy is also a cheaper option than building new gas plants; if these gas plants are foolishly built, they are very likely to become stranded costs before the end of their intended life as the cost of building and operating clean energy becomes cheaper than simply operating these gas plants.<sup>65</sup> As a result, ratepayers will once again pick up the tab for utilities foolish fossil fuel investments, as has already happened with coal plants. Utilities can not continue to make poor decisions for our health and future and stick us with the bill.



#### Figure 3: The Worst Utilities by Planned Gas Capacity



Still, since the release of our first report, which was based on the existing operations of these utilities in 2019 and their plans for change starting in 2020, there has been some positive progress. Over the course of 2020 and 2021, the companies in this study built more than 11 GW of clean energy and retired more than 9 GW of coal generation, eliminating pollution that was warming our planet and sickening our communities.<sup>66</sup> While those steps move us in the right direction, the overall results of this study show that they are far from what we need to achieve our goals.

Utilities must transition to clean energy, and it is crucial for that transition to happen in ways that reduce harm on communities that are overly burdened. Unfortunately, rural-urban and racial disparities persist in renewable energy adoption and "communities most in need of economic development and employment opportunities often see lower levels of renewable energy deployment."<sup>67</sup> In retiring coal plants and building clean energy, companies must prioritize overburdened communities. Without this prioritization, transition plans miss the mark.

It is also important to note that the scores only reflect planned coal retirements, clean energy buildout, and new gas plant development. Other areas where utilities must improve are outside the scope of our analysis, such as phasing out existing gas power plants, addressing energy burden and inequitable rate structures, reducing disconnections including dangerous utility shut-offs during extreme weather events, cleaning up legacy pollution such as coal ash, providing real financial support for demand response and energy efficiency, and reducing harmful air and water pollution. The score also does not factor in attempts by utilities to obstruct customer-owned resources that support the clean energy transition, such as distributed solar and storage. Finally, many of these companies also include gas distribution subsidiaries; the efforts of those gas utility subsidiaries to obstruct the transition to clean energy are not evaluated here, but these are clearly shown in other work.68





Public Service Company of Oklahoma

Northern Indiana Public Service Company (NIPSCO)

Xcel Minnesota

Entergy Arkansas

# UTILITIES CONTINUE TO GREENWASH

#### **KEY FINDINGS:**

- While many electric utilities have pledged to reduce their GHG emissions, their goals fall far short of what is necessary to protect people and the planet.
- Over half of the parent companies we studied either have no climate goal or only have a goal for after 2030.
- Forty of the 50 parent companies in the study had some form of climate pledge, target, or aspirational goal. Of those 40 companies with a climate pledge of some kind, 23 had goals with milestones within this critical decade (2030 or earlier), but only 7 had goals ambitious enough to meet the scale of change we need, at least 80 percent clean energy by 2030.
- Utilities lacking climate goals are significantly underperforming, with an aggregate score of just 6 points.

|   | 2021 Report | 2022 Report |
|---|-------------|-------------|
| Number of parent companies with no goal   | 17          | 10          |
| Number of parent companies with a climate goal  | 33          | 40          |
| Number of parent companies with a climate goal for 2030 or earlier                    | 23          | 23          |
| Number of parent companies aiming for at least 80 percent emissions reduction by 2030 | 4           | 7           |

After the release of the first version of this report, many utilities responded by touting their clean energy or emissions reductions plans. While this is common practice — companies with climate goals like to point to the targets as evidence of their good, "clean", or "green" practices — many of these goals appear to have no real impact on the actual behaviors of the utilities in our study. For example, while Southern Company has a climate pledge to be carbon neutral by 2050, its subsidiaries including Georgia Power, Mississippi Power, and Alabama Power have stated that this goal does not apply to their planning.<sup>69</sup> This is simply greenwashing while companies delay meaningful action.

In order for a utility to have a meaningful climate goal, the goal must meet the following criteria:

- 1. Apply to all subsidiary companies;
- Include regular interim targets, including at least 80 percent emissions reductions by 2030, not just long-term 2050 goals; and
- **3.** Provide regular updates and a comprehensive plan for how the target will be achieved, backed by concrete IRP commitments.

Additionally, meaningful goals should include details on how those emissions reductions will target marginalized and overburdened communities. Current climate commitments lack consideration of this crucial aspect. Companies must prioritize the retirement of polluting plants and the addition of clean energy where it will mitigate harm in historically excluded communities. Importantly, the IRA supports this goal by giving additional funding to clean energy projects built in certain low-income communities and "energy communities," defined as those living close to a retired coal mine or plant or who were historically dependent on fossil fuel employment.<sup>70</sup>

Of the parent companies with a climate goal of any kind, only one (NiSource, parent of Northern Indiana Public Service Company) received an A.<sup>71</sup> The vast majority received a D (35 percent) or an F (35 percent). Without substantiated actions to reduce current emissions by retiring existing coal plants and eliminating plans to build future gas plants, rhetorical climate goals only serve to mislead customers and investors. Seven companies listed weak climate goals targeting net-zero emissions by 2050, with no intermediate targets. 2050 climate goals entirely miss what utilities can and must deliver in the

| AGGREGATE SCORE OF: |                                     |  |  |  |  |
|---------------------|-------------------------------------|--|--|--|--|
| All<br>companies    | Parent<br>companies with<br>no goal | Parent companies<br>with a climate<br>goal | Parent companies<br>with a climate goal for<br>2030 or earlier | Parent companies aiming<br>for at least 80% emissions<br>reduction by 2030 |  |
| 21                  | 6                                   | 23   | 21   | 43   |  |

near term, and these companies are likely attempting to use 2050 climate goals purely for greenwashing.

Although climate goals are not leading to sufficient action, parent companies with no climate goal perform even worse. These companies have an aggregate score of just six points, and nearly all receive an F. On the other hand, parent companies with goals specifying emissions reductions of at least 80 percent by 2030 perform well above average in our analysis, with an aggregate score of 43 points. Companies that set strong, near-term goals are also taking more action to transition to clean energy, while companies that are not taking action try to hide behind general, long-term climate pledges.

Table 1, below, shows the worst greenwashers in our study. These parent companies boast aggressive emissions reduction goals, but lack action plans to achieve those goals. We define the worst greenwashers as those parent companies claiming to target emissions reductions by 2030 or earlier that get a D or an F for their actual plans. Among this group, 8 companies receive an F and 8 companies receive a D. Many also frame their climate goals as "aspirational" goals, further undermining actual commitments to meaningful change.



SOUTHERN COMPANY (Grade: F) is greenwashing promoting their climate goals without backing it up with action.



wecenergygroup.com/csr/



WEC (Grade: F) boasts about their "leadership in the decarbonization effort" without an action plan that backs it up — WEC is greenwashing.

| Table 1: Greenwashing's Worst Offenders                       |       |   |  |  |
|---|-------|---|--|--|
| PARENT COMPANY  | GRADE | CLIMATE GOAL  |  |  |
| Alliant Energy Corporation                                    | D     | $50\%$ $CO_2$ reduction by 2030 (2005 baseline); Net-Zero by 2050 (aspirational)  |  |  |
| Ameren Corporation  | D     | $60\%\ CO_2$ reduction by 2030, 85% reduction by 2040 (2005 baseline); Net-Zero by 2050   |  |  |
| Cleco Partners LP   | D     | $60\%$ $CO_2$ reduction by 2030; Net-Zero by 2050 (aspirational)  |  |  |
| Duke Energy Corporation                                       | F     | $50\%$ $CO_2$ reduction by 2030; Net-Zero by 2050 (aspirational)  |  |  |
| East Kentucky Power Cooperative, Inc.                         | F     | $35\%~\text{CO}_2$ reduction by 2035, 70% reduction by 2050 (2010 baseline); 10% renewable by 2030, 15% renewable by 2035           |  |  |
| Emera Incorporated (Tampa Electric)                           | D     | $55\%\ \text{CO}_2$ reduction by 2025, 80% reduction by 2040 (2005 baseline); Net-Zero 2050   |  |  |
| Evergy, Inc.  | D     | $70\%$ $CO_2$ reduction by 2030 (2005 baseline); Net-Zero by 2045   |  |  |
| FirstEnergy Corp. (Monongahela Power)                         | F     | $30\%$ $CO_2$ reduction by 2030 (2019 baseline); Net-Zero by 2050   |  |  |
| JEA   | D     | 30% carbon neutral energy supply by 2030  |  |  |
| OGE Energy Corp.  | F     | 50% CO <sub>2</sub> reduction by 2030 (2005 baseline)   |  |  |
| Pinnacle West Capital Corporation (Arizona Public<br>Service) | D     | 65% clean energy by 2030; 100% clean by 2050 (aspirational)   |  |  |
| Portland General Electric Company                             | F     | $80\%$ $CO_2$ reduction by 2030 (2010 baseline); No $CO_2$ emissions in customer power by 2040; Net-Zero company operations by 2040 |  |  |
| South Carolina Public Service Authority (Santee<br>Cooper)    | F     | 50% CO <sub>2</sub> reduction by 2030 (2005 baseline)   |  |  |
| Southern Company  | F     | $50\%$ $CO_2$ reduction by 2030 (2007 baseline); Net-Zero by 2050   |  |  |
| Tennessee Valley Authority                                    | F     | $70\%$ $CO_2$ reduction by 2030, 80% reduction by 2035 (2005 baseline); Net-Zero by 2050 (aspirational)                             |  |  |
| WEC Energy Group, Inc.  | D     | $60\%$ $CO_2$ reduction by 2025; 80% reduction by 2030 (2005 baseline); Net-Zero by 2050  |  |  |

Utility companies should be taking immediate steps to significantly reduce carbon emissions and actively support state legislative efforts and Public Utility Commission (PUC) processes to implement binding, aggressive clean electricity targets. Sadly, the opposite is true. Despite making public commitments to address climate change, most utility companies are failing to take action to reduce their own emissions. Even worse, many utilities have worked to promote climate denial, doubt, and delay over many decades. Like oil and gas companies, utilities knew about the dangers of climate change as early as the 1960s and 1970s, but still spread disinformation. A strong correlation exists between the dirtiest utilities included in this report and those that historically delayed progress and promoted climate denial, including Southern Company, Ameren Corporation, Duke Energy Corporation, FirstEnergy Corp., and Pinnacle West Capital Corporation (Arizona Public Service).<sup>72,73</sup>

However, unlike fossil fuel companies, electric utilities do not produce fossil fuels.<sup>74</sup> Clean energy, coupled with widespread electrification, offers utilities a major business opportunity. Utilities that choose to slow climate progress or greenwash the public with weak commitments are ignoring a chance for economic growth and failing in their responsibility to reduce harm on overburdened communities and maintain a livable future.

# FACT CHECKING UTILITY RESPONSES

#### **KEY FACTS:**

- Past emissions reductions do not negate the need for transformational action in the next decade.
- Studies show rapidly transitioning to clean energy is affordable and reliable.
- Retiring coal and building clean energy by 2030 is not an arbitrary timeline, but is based on scientific consensus and necessity.

When our inaugural study was released in January 2021, some investor-owned utilities and the utility trade association Edison Electric Institute (EEI), primarily responded by claiming that:

- 1. Utilities had already achieved significant carbon emissions reductions.
- **2.** Moving rapidly to clean energy would compromise reliability and/or affordability.
- 3. The 2030 timeframe of our study was arbitrary.

However, multiple studies have shown that there is much more to do to reduce emissions. It's also clear that clean energy can grow rapidly without compromising on cost or reliability — in fact, clean energy can save customers money. Furthermore, we must transition the power sector by 2030 if we are to avoid the most catastrophic effects of climate change.

#### 1. PAST EMISSIONS REDUCTIONS DO NOT NEGATE THE NEED FOR FUTURE ACTION

Some utilities responded to our forward looking analysis by pointing to past actions or emissions reductions.<sup>75</sup> While we applaud past actions where they have occurred, utilities have not gone far enough, and we must look to the future for what still needs to be done. Regardless of past actions, the mandate for the next decade is clear: plan for the rest of the steps needed to achieve 80 percent clean energy in 2030. The electric sector has to move to a clean electric grid as rapidly as possible to enable us to reduce GHG pollution across the rest of the economy.

#### 2. RAPIDLY TRANSITIONING TO CLEAN ENERGY IS AFFORDABLE AND RELIABLE

EEI claimed that our first report did not look at utility transitions "holistically" or consider affordability.<sup>76</sup> However, even before publication of the first report, there was already a wealth of studies showing a clean electric grid can maintain both affordability and reliability. These studies only continue to multiply. UC Berkeley's 2030 Report modeled an 80 percent clean electric system by 2030 and found that wholesale electricity costs would be the same in 2030 as in 2020. This study was detailed in its assessment and tested the grid in every hour of multiple weather-years using the PLEXOS model.<sup>77</sup> A meta analysis of 11 clean energy models affirmed that achieving 80 percent clean electricity by 2030 is feasible, affordable, and does not compromise reliability.<sup>78</sup> In fact, replacing coal plants with renewables could save ratepayers anywhere from \$3 to \$8 billion a year.<sup>79</sup> Mounting research shows the falsehood of the claim that clean energy is not reliable or affordable, and the IRA will only make the transition more economically advantageous for customers and utilities alike.

#### 3. 2030 IS NOT AN ARBITRARY TIMELINE

Some utilities suggested the 2030 timeline in the report for a coal-free electric grid was chosen arbitrarily.<sup>80</sup> The 2030 timeline for a coal-free electric grid is driven by climate science and economics; it is not arbitrary. An analysis of global and regional coal phase-out requirements based on the Paris Agreement and the IPCC's 1.5°C report found that developed countries must end their coal use entirely by 2030.<sup>81</sup> This finding was recently echoed by the United Nations Secretary General António Guterres.<sup>82</sup> Princeton's Net-Zero Energy America study found that across five cost-minimized energy supply pathways, "coal use is essentially eliminated completely by 2030".83 A separate study found that while carbon-neutral pathways diverge in strategy after 2035, they are consistent in emphasizing coal retirement. Coal accounted for less than one percent of total generation by 2030 in their modeling.<sup>84</sup> As discussed earlier in this report (see "Electric Sector Remains Critical"), a multitude of studies show the need for a clean energy transition on this timeline.

### CONCLUSION

Utilities continue to drag their feet on the clean energy transition. In order to avoid the worst impacts of climate change, utilities must transition to at least 80 percent clean energy by 2030. With fewer than 10 years to go, utilities claim that they are working towards significant emissions reductions, but their actions do not support their words. These companies have not used the past year and a half to plan for this necessary transition. Every year utilities delay makes the problem worse and increases the need for even faster clean energy growth in the future. We do not have any time left to waste.

In this report, we looked at 77 companies that make up roughly 40 percent of total US power generation.<sup>85</sup> The aggregate score for these companies was 21 out of 100, only four points higher than the aggregate a year and a half ago. These companies' supposed climate commitments are mostly greenwashing. A large number of utilities with climate goals continue to fail to do what is necessary to reduce emissions. Of the parent companies with climate goals, 70 percent received a D or F, while only one received an A. Despite more utilities adopting climate goals in the last year and a half, the aggregate score showed little improvement, demonstrating once again that utilities are not following up on their climate goals with sufficiently ambitious action plans. Utilities can and must be leaders in a transition to a clean energy economy that preserves a livable planet.



### **CASE STUDY:** NextEra / Florida Power and Light Make Progress

In June 2022, NextEra Energy announced plans to get to "Real Zero<sup>™</sup>" by 2045.<sup>86</sup> This plan would eliminate all of the company's carbon emissions by 2045, partly by growing the solar and energy storage capacity of their subsidiary, Florida Power and Light (FPL), to 90,000 MW and 50,000 MW, respectively.<sup>87</sup> Although the announcement did not include details on any additional clean energy projects beyond what was specified in FPL's plans filed in 2022, FPL still achieved a B based on plans it made prior to this announcement.

FPL has plans to retire all of its coal by 2030, which is the key driver earning points for its score. This is a huge improvement from our last report, where FPL did not yet have plans to retire any of its coal by 2030 and earned an F.<sup>88</sup> Unfortunately, FPL just finished a massive gas plant in Dania Beach and is increasing generating capacity at other existing gas plants, committing to burn more fossil fuels into the future. FPL's available clean energy plans include enough clean energy to replace only 16 percent of its existing fossil generation, making it an area for improvement for the utility. In addition, FPL is coming under increased scrutiny due to its involvement in a series of election scandals in the state, funneling millions of dollars in a complex scheme to help elect candidates friendly to the utility and thwart the development of distributed generation in Florida.89

With NextEra's Real Zero commitment, we hope to see FPL make good on its promises and make decisions in the best interest of its customers. In a statement, NextEra acknowledged that FPL can reach the Real Zero<sup>™</sup> goal without increasing its customers' bills because renewable energy is often less expensive than existing and new fossil-fueled generation.<sup>90</sup> An increased investment in renewables, as well as customer-sited resources like distributed solar and storage, will help reduce energy costs in the sunshine state.

NextEra's announcement is also significant because other utilities in Florida are in various stages of their planning and can take cues from this major announcement.

1. JEA, Jacksonville's municipal utility, has old and uneconomic coal units and is currently developing its Integrated Resource Plan (IRP) that can and should chart a course to a clean, renewable energy future for Jacksonville. JEA receives a D with plans to retire only a third of its coal by 2030 and barely any plans for clean energy replacements in that timeframe. However, JEA has not planned to build any new gas through 2030, giving them a blank canvas to use their upcoming IRP to plan for more clean energy rather than fossil fuels. Sierra Club recently released a report showing that a move away from coal to clean energy will save customers between \$15 million and \$60 million per year, while cutting climate pollution and local air pollution emissions by more than half.<sup>91</sup>

**2. Tampa Electric (TECO)** has started building a massive gas power plant on the low-lying foundation of its old coal-fired power plant at Big Bend Power Station on the shores of Tampa Bay and has plans to build two additional gas power plants before 2030. Due to its plans to retire less than half its coal by 2030 and build little clean energy to replace it, TECO also receives a D. In 2021, the City of Tampa voted for 100 percent renewable energy by 2035, but they have been prevented from moving on the non-binding resolution due to state law.<sup>92, 93</sup>

**3. Duke Florida** is lagging even further behind, without plans to retire its only coal plant by 2030. Duke is also planning to add a new gas plant before 2030 and only has plans to build enough clean energy to replace less than 15 percent of its fossil generation. Stuck in a fossil fuel rut, Duke receives an F.

**4.** On the other hand, **Orlando Utilities Commission (OUC)** receives a B, with plans to retire all of its coal-fired power plants by 2030 and plans to build enough clean energy to replace half of its fossil generation. OUC can improve by planning more clean energy, cutting plans for new gas capacity at the Stanton power plant, and making good on the board's promise to achieve an energy efficiency goal of 1 percent of retail sales.

| Table 2: Scores of Select Florida Utilities |        |  |
|---|--------|--|
| Florida Power and Light                     | B (56) |  |
| JEA   | D (20) |  |
| Tampa Electric                              | D (25) |  |
| Duke Energy Florida                         | F (6)  |  |
| Orlando Utilities Commission                | B (65) |  |

NextEra and OUC demonstrate that in Florida, it is possible to transition to a clean energy future. The rest of the Florida utilities need to follow that example and catch up with clean energy plans of their own.

### **CASE STUDY:** Greenwashing from Tennessee Valley Authority

The Tennessee Valley Authority (TVA) is the nation's largest federal utility and serves seven southeastern states. TVA professes a goal for 70 percent carbon reductions by 2030 from a 2005 baseline, 80 percent reductions by 2035, and an aspiration to be net-zero by 2050.<sup>94</sup>

TVA has fallen behind on clean, renewable energy investment, contradicting clear climate science and the Biden Administration's calls for carbon-free electricity. In our first report, TVA received a nine out of 100. Even with that terrible starting point, TVA managed to do worse over the last year and a half and received a two in this year's analysis. TVA has firm plans to retire only three percent of its remaining coal generation by 2030, even though it acknowledges that under least-cost planning assumptions all of its coal will retire by 2035.95 It is also planning to build over four gigawatts of new gas through 2030. These new gas plant proposals also require additional fossil fuel infrastructure; new gas pipelines would need to be built across communities throughout Tennessee to feed these proposed dirty power plants. Those four gigawatts of new gas account for more than half of TVA's existing coal capacity. Even if TVA did retire some of its coal, it would be replacing it with another fossil fuel.

Replacing coal with a different fossil fuel will not achieve the emissions reduction needed — coal must be replaced by clean energy. TVA is lagging in clean energy plans by not increasing its plans for clean energy since the last report, planning enough to replace less than 20 percent of its existing coal and gas generation. Not only is clean energy the clear choice for emissions reductions, clean energy could bring far more jobs to TVA's region than new gas plants.<sup>96</sup> EPA and the City of Nashville have urged TVA to reconsider renewable energy instead of a 1,500 MW combined cycle gas plant to replace the Cumberland coal plant.<sup>97, 98</sup> Replacing coal with clean energy would also save TVA's customers as much as \$9 billion compared to gas replacements.<sup>99</sup> Those savings will be even higher with the passage of the Inflation Reduction Act, which includes clean energy tax credits and loans, and specifically names TVA as an entity that can take advantage of them.<sup>100</sup> If TVA does foolishly move forward with gas plans, those gas plants are also likely to become stranded costs well before the end of their lifetime, as clean energy is cheaper to build and run.<sup>101</sup> TVA's customers would bear the costs of those stranded plants.

TVA likes to claim it is a "clean-energy leader and is committed to partnering with others to go further and faster to achieve its carbon-reduction initiatives", but the facts show this is far from the truth.<sup>102</sup> Of any parent company in our analysis, TVA has the fifth largest coal fleet, the second highest planned gas buildout through 2030, and the eighth largest planned clean energy buildout through 2030.<sup>103</sup> TVA is responsible for more premature deaths from air pollution from coal plants than even the worst private power company or their parent company.<sup>104</sup> TVA executives' compensation is even in part tied to gas and coal use.<sup>105</sup>

TVA could be at the forefront of the transition off fossil fuels and pioneer the clean and just energy future we desperately need. Instead, it is actively pursuing risky gas infrastructure that threatens to lock its 10 million customers into more decades of price volatility, pollution, and energy insecurity. Professing climate goals without plans to back them up is textbook greenwashing. TVA needs to ditch its gas plant and pipeline plans, commit to retire its coal, and plan to build more clean, renewable energy.

### **CASE STUDY:** Checking in on Indiana Utilities

In our first report, we highlighted the stark contrast between the five largest utilities in Indiana, some of which are moving rapidly toward a clean energy future while others remain stuck in the fossil fuel past.

This contrast remains, and we can now also see how some of these utilities have used the past year and a half to make progress, while others have fallen even farther behind. The scores of the five Indiana utilities included in the report ranged from an 85 all the way down to a 26. Northern Indiana Public Service Company (NIPSCO), already a leader in Indiana, saw little change since the previous report. Duke Energy Indiana and Indiana Michigan Power (I&M) both improved their score, but CenterPoint Energy (formerly Vectren) and AES Indiana (formerly IPL) both regressed and are receiving lower scores. NIPSCO and I&M are earning an A and a B respectively, with plans to retire most or all of their coal plants by 2030 and build significant amounts of clean energy. However, they are both still planning new gas additions incompatible with a clean energy future. Duke Indiana, Centerpoint, and AES Indiana score far lower, failing to retire their coal by 2030, lacking plans for the clean energy buildout necessary to replace their fossil generation, and doubling down on gas instead (see Figure 5 for the full distribution of utilities and scores). Each of these utilities needs to make further commitments to retire existing coal plants and build clean energy instead of gas.





### CASE STUDY: Duke Continues to Lag

Duke Energy Corporation's non-merchant subsidiaries include five investor-owned utilities: Duke Florida, Duke Indiana, Duke Kentucky, Duke Carolinas, and Duke Progress (which also operates in the Carolinas).<sup>106</sup> Combined, these utilities received an F in the previous report and have seen little improvement since. At an operating company level, we find that with the exception of Duke Indiana, all of the operating companies — Duke Carolinas, Duke Progress, Duke Florida, and Duke Kentucky — score under 10.

The five Duke subsidiaries included in the report generated 125 million MWh of electricity from coal and gas in 2021, a minor reduction from the 131 million MWh of electricity they generated from coal and gas in 2019. The companies are planning to add 26 million MWh of clean energy between 2022 and 2030, compared to 17 million MWh of clean energy planned between 2020 and 2030 at the time of the first report. Duke has only firmly committed to retire 18 percent of its coal generation by 2030 and intends to build over 5,400 MW of new gas by 2030. Unfortunately, Duke has remained committed to coal generation and this gas buildout since our last report, instead of shifting its focus in a meaningful way to a much larger clean energy buildout.

Figure 6: Duke Energy Score and Coal, Gas, and Clean Energy Metrics

| DUKE ENERGY CORPORATION<br>Planned Clean Energy Vs. Existing Fossil Generation |                             |  |                         | Score<br>(out of 100)<br><b>13</b>   |                                     |                      |              |            |
|--|-----------------------------|--|-------------------------|--------------------------------------|-------------------------------------|----------------------|--------------|------------|
| 0  | l<br>20<br>2022-2030 planne | l<br>40<br>d clean energy additions (gre | l<br>60<br>een) compare | l<br>80<br>ed to 2021 coal and gas ; | l<br>100<br>generation (gray) [mill | l<br>120<br>ion MWh] | 140          | Grade<br>F |
| Compa  | ny coal and gas             | metrics                                  |                         |                                      | Company clear                       | n energy metrics     |              |            |
| 20210  | oal generation (            | million MWh)                             |                         | 52                                   | 2022-2030 pla<br>(million MWh)      | anned clean energ    | gy additions | 26         |
| 2021G  | as generation (r            | nillion MWh)                             |                         | 73                                   | Solar capacity                      | planned (MW)         |              | 10,604     |
| 20210  | coal and Gas cap            | acity (MW)                               |                         | 41,270                               | Wind capacity                       | planned (MW)         |              | 1,080      |
| Coal co  | mmitted to retir            | e by 2030 (million MWI                   | h)                      | 9                                    | Residential effi                    | ciency               |              | 1.2%       |
| Coal no<br>(million  | t committed to<br>MWh)      | retire by 2030                           |                         | 43                                   | Commercial ef                       | ficiency             |              | 0.7%       |
| Percent  | tage of coal com            | mitted to retire by 2030                 | 0 (%)                   | 18%                                  | Industrial effic                    | iency                |              | 0.0%       |
| Planned  | d new gas capac             | ity by 2030 (MW)                         |                         | 5,414                                | TOTAL EFFICI                        | ENCY                 |              | 0.8%       |

While Duke's 5,400 MW of new gas by 2030 is a significant drop from its plans in the last report for 7,800 MW of new gas by 2030, Duke is still the parent company with the most planned gas of any in the country. Nearly 75 percent of Duke's planned gas currently sits within its Carolinas and Progress subsidiaries, which both operate in North and South Carolina. If all of Duke's planned gas plants are built and operate similarly to how gas plants in these states have historically operated, they would generate an estimated 24 million MWh each year.<sup>107</sup> This new gas capacity could generate nearly as much power as half of Duke's existing coal fleet and

emit an estimated 19 million metric tons of carbon dioxide equivalent each year, equivalent to the annual emissions from over 4 million cars — more than all the cars in North Carolina.<sup>108, 109</sup> Beyond 2030, Duke plans to build an additional 1,700 MW of gas capacity. In other words, Duke is planning for an energy future centered on gas — not clean energy. If Duke committed to retire all of its existing coal by 2030 and stopped all plans to build new gas, its score would improve to a B (60). To score 100, Duke would need to make plans to build nearly five times as much clean energy as it is currently planning in order to replace its fossil generation.

### CASE STUDY: Duke Continues to Lag, cont.

A recent study from Synapse Energy Economics found that the least-cost pathway for Duke Energy Carolinas and Duke Energy Progress to meet North Carolina's emissions goals would be to add no new gas through 2030.<sup>110</sup> Yet, Duke Carolinas and Duke Progress have proposed a more costly plan that includes adding nearly 4,000 MW of new gas capacity in that timeframe, saddling ratepayers with higher bills and opening them up further to volatile gas prices.<sup>111</sup>

|  | Duke Energy<br>Carolinas | Duke Energy<br>Florida | Duke Energy<br>Indiana | Duke Energy<br>Kentucky | Duke Energy<br>Progress |
|--|--------------------------|------------------------|------------------------|-------------------------|-------------------------|
| Utility Score  | 4.3                      | 5.9                    | 27.4                   | 9                       | 4.9                     |
| 2021 coal generation (million MWh)                     | 20.8                     | 5.0                    | 16.9                   | 2.5                     | 6.8                     |
| 2021 gas generation (million MWh)                      | 14.6                     | 34.3                   | 2.3                    | 0.1                     | 22                      |
| 2021 coal and gas capacity (MW)                        | 12,803.5                 | 10,308.7               | 7,374.3                | 1,343.8                 | 9439.4                  |
| Coal committed to retire by 2030<br>(million MWh)      | 0.9                      | 0                      | 8.5                    | 0                       | 0                       |
| Coal not committed to retire by 2030<br>(million MWh)  | 19.9                     | 5.0                    | 8.3                    | 2.5                     | 6.8                     |
| Percentage of coal committed to retire by 2030 (%)     | 4%                       | 0%                     | 51%                    | 0%                      | 0%                      |
| Planned new gas capacity by 2030 (MW)                  | 2,345                    | 233                    | 1,221                  | 0                       | 1,615                   |
| 2022-2030 planned clean energy additions (million MWh) | 8.0                      | 5.5                    | 4.0                    | 0.5                     | 7.8                     |
| Solar capacity planned (MW)                            | 3,029.9                  | 2,846.2                | 1,725                  | 90                      | 2,912.6                 |
| Wind capacity planned (MW)                             | 440                      | 0                      | 100                    | 100                     | 440                     |

#### Table 3: Detailed Scoring for Duke's Five Operating Companies Included in the Study

Given its weak coal-retirement commitments and its supersized planned gas buildout over this next decade, Duke's plans remain entirely incompatible with limiting warming to 1.5°C. While Duke is planning to build some solar capacity, the size and pace of its commitment is inadequate, especially for a company with its resources. Unfortunately, Duke continues to rely on unproven technologies in its planning, including new nuclear technologies and zero-carbon hydrogen, harkening back to the made-up "zero-emitting load-following resources" or "ZELFRs" from Duke's 2020 Climate Report.<sup>112, 113</sup> Duke plans to continue to operate a fossil-heavy grid while waiting for unproven technology. In 2020, we knew we did not need to wait on "ZELFRs," and our evidence has only gotten stronger that Duke can reduce emissions with the technologies already available; there is no reason for Duke to wait to stop emitting greenhouse gas pollution until new and unproven technologies come into existence.

Duke is aiming for only a 50 percent carbon reduction by 2030 (from 2005 levels) and net-zero emissions 30 years in the future. This decade is the one that really matters if we are to have any hope of avoiding the most damaging climate change scenarios. Duke must increase its climate commitment and set a goal of at least 80 percent emissions reductions by 2030. More importantly, Duke must back this goal up by releasing plans to retire all of its remaining coal plants by 2030, canceling new gas plants, and building out wind and solar resources to take the place of these dirty fossil fuels.

# APPENDIX A: METHODS UPDATE

We analyzed investor-owned utilities, public power utilities (such as Tennessee Valley Authority), generation and transmission cooperatives, and large municipal utilities. These utilities all seek some form of rate recovery for their generation resources. They are all responsible for the resource adequacy of their generation supply, which means that when they plan retirements of coal and gas plants, they are responsible for building or sourcing replacement energy and capacity to comply with their resource adequacy requirements. We did not study any purely merchant generating companies.

We limited our study to the top 50 parent companies as ranked by remaining coal and gas under ownership. As of 2021, these companies accounted for roughly 50 percent of all remaining coal and gas generation in the country.<sup>114,</sup> <sup>115</sup> These 50 parent companies have 77 operating companies and 93 unique owners, as listed in Appendix C. Some parent companies had only one relevant non-merchant operating company, whereas others had multiple operating companies (for example, American Electric Power had seven operating companies). We only looked at coal and gas plants under direct ownership by these utilities and did not study power purchase agreements with coal and gas plants or other wholesale contracts or purchases of unspecified power. Using S&P Global Market Intelligence's database, we aggregated coal and gas generation by owner, operating company, and parent company for the calendar year 2021.<sup>116</sup> The Coal Creek and Merom coal plants were included in the sample as operating plants without a retirement date prior to the end of 2030 because the previous owners sold these plants, despite having announced retirement plans prior to the sale, and the new owners have not announced plans to shutter these plants prior to 2030. Going back on retirement commitments by selling coal plants that will then continue running does not count as a retirement.

To quantify clean energy plans, we tracked integrated resource plans for those utilities that file them publicly as well as corporate announcements of clean energy projects. We included planned renewables regardless of whether the utility plans to build the project itself or buy renewable energy via a power purchase agreement. We aggregated the amount of wind and solar capacity planned by each utility in 2022 through 2030. To convert capacity into generation, we used a set of state-specific capacity factors for onshore wind, offshore wind, utility solar, and distributed solar from sources including the Energy Information Administration (EIA) and National Renewable Energy Laboratory. We assumed that a utility operating in a given state would build its projects in that state unless otherwise specified. This may not be the case in the end, but generally technology-specific capacity factors do not vary greatly between neighboring states.

Planned gas data included any new gas capacity that had been proposed by a utility in an IRP or other publicly available source. Planned gas included new gas capacity in any stage before operation (i.e., included under construction). This also included coal-to-gas conversions where planned, but does not include capacity increases at existing gas plants where a new turbine is not being added.

| The overall utility | v score was calculated using t  | he following equation:   |  |
|---------------------|---|--|--|
| Score =             | Clean planned [MWh] (2022-2030)<br>Existing coal + gas [MWh] (2021) + | Coal committed to retire by 2030 [MWh]         Existing coal [MWh] (2021)         2         All data is up to date as of July 1, 2022. | _ <u>Planned gas by 2030 [MW]</u><br>Existing coal + gas [MW] (2021) <b>*100</b> |

Points are earned by retiring coal and building clean energy through 2030, while points are lost by building new gas in that timeframe. The scores are divided by two to keep it on a scale of 0 to 100. If a score is below 0 due to high gas penalties, then the company receives a 0. While the clean energy and coal components of the score are in terms of generation (megawatt hours), the gas component of the score is in terms of capacity (megawatts), as it is unclear how much each new gas plant would run (i.e., its capacity factor). A perfect 100 is achieved if a company commits 1) to retiring all of its coal, 2) to not building any new gas, and 3) to building an amount of new clean energy commensurate with its existing fossil fuel generation by 2030. Finally, companies are assigned letter grades according to where their score lies on the following scale:

#### $A \ge 75$ 50 ≤ B < 75 35 ≤ C < 50 17.5 ≤ D < 35 F < 17.5

The cutoff for a failing grade (17.5) is slightly above the aggregate score of all companies studied from the inaugural version of this report (17.2).<sup>117</sup>

# APPENDIX B: PARENT COMPANY CLIMATE GOALS

| Parent Company                          | Climate Goal  |
|---|---|
| Algonquin Power & Utilities Corp.       | Net-Zero by 2050  |
| Alliant Energy Corporation              | 50% $CO_2$ reduction by 2030 (2005 baseline); Net-Zero by 2050 (aspirational)   |
| Ameren Corporation                      | $60\%$ $CO_2$ reduction by 2030, 85% reduction by 2040 (2005 baseline); Net-Zero by 2050                                  |
| American Electric Power Company, Inc.   | 80% CO <sub>2</sub> reduction by 2030 (2000 baseline); Net-Zero by 2050   |
| Arkansas Electric Cooperative Corp.     | No goal   |
| Associated Electric Cooperative Inc.    | No goal   |
| Basin Electric Power Cooperative        | No goal   |
| Berkshire Hathaway                      | Net-Zero by 2050 (aspirational)   |
| Big Rivers Electric Corporation         | No goal   |
| Buckeye Power, Inc.                     | No goal   |
| Centerpoint Energy, Inc.                | Net-Zero by 2035  |
| City Public Service of San Antonio      | Carbon Neutral by 2050  |
| Cleco Partners LP                       | $60\%$ $CO_2$ reduction by 2030 (2011 baseline); Net-Zero by 2050 (aspirational)  |
| CMS Energy Corporation                  | Net-Zero by 2040  |
| Dominion Energy, Inc.                   | Net-Zero by 2050  |
| DTE Energy Company                      | 80% CO <sub>2</sub> reduction by 2040 (2005 baseline); Net-Zero by 2050   |
| Duke Energy Corporation                 | $50\%~\text{CO}_2$ reduction by 2030 (2005 baseline); Net-Zero by 2050 (aspirational)                                     |
| East Kentucky Power Cooperative, Inc.   | $35\%~\text{CO}_2$ reduction by 2035, 70% reduction by 2050 (2010 baseline); 10% renewable by 2030, 15% renewable by 2035 |
| Emera Incorporated                      | $55\%~\text{CO}_2$ reduction by 2025, 80% reduction by 2040 (2005 baseline); Net-Zero 2050                                |
| Entergy Corporation                     | Net-Zero by 2050  |
| Evergy, Inc.                            | 70% $CO_2$ reduction by 2030 (2005 baseline); Net-Zero by 2045  |
| FirstEnergy Corp.                       | 30% CO <sub>2</sub> reduction by 2030 (2019 baseline); Net-Zero by 2050   |
| Fortis Inc.                             | $75\%~\text{CO}_2$ reduction by 2035 (2019 baseline); Net-Zero by 2050  |
| Great River Energy                      | 80% CO <sub>2</sub> reduction by 2032 (2005 baseline)   |
| Hoosier Energy Rural Electric Coop Inc. | No goal   |
| IDACORP, Inc.                           | 100% clean energy for Idaho Power by 2045   |
| Intermountain Power Agency              | No goal   |
| JEA                                     | 30% carbon neutral energy supply by 2030  |
| Lower Colorado River Authority          | No goal   |
| Nebraska Public Power District          | Net-Zero by 2050  |
| NextEra Energy, Inc.                    | $67\%$ reduction in $CO_2$ emissions rate by 2025 (2005 baseline), equivalent to ${\sim}40\%$ CO_2 reduction by 2025      |
| NiSource Inc.                           | $90\%~\text{CO}_2$ reduction by 2030, 50% methane reduction from pipelines by 2025 (2005 baseline)                        |
| OGE Energy Corp.                        | 50% CO <sub>2</sub> reduction by 2030 (2005 baseline)   |
| Oglethorpe Power Corporation            | No goal   |
| Omaha Public Power District             | Net-Zero by 2050  |
| Orlando Utilities Commission            | 50% $CO_2$ reduction by 2030 (2005 baseline); Net-Zero by 2050  |
| Pinnacle West Capital Corporation       | 65% clean energy by 2030 (2005 baseline); 100% clean by 2050 (aspirational)   |
| PNM Resources, Inc.                     | 100% emissions-free generation by 2040 (voluntary);<br>100% zero-carbon resources by 2045 (mandatory)                     |

#### APPENDIX B: PARENT COMPANY CLIMATE GOALS, cont.

| Parent Company  | Climate Goal  |
|---|---|
| Portland General Electric Company                     | $80\%$ CO_2 reduction by 2030 (2010 baseline); No CO_2 emissions in customer power by 2040; Net-Zero company operations by 2040       |
| PPL Corporation                                       | $70\%$ CO_ $_{\rm 2}$ reduction by 2035, 80% reduction by 2040 (2010 baseline); Net-Zero by 2050                                      |
| Puget Holdings LLC                                    | Net-Zero by 2030; 100% carbon-free electric supply for Puget Sound Energy by 2045   |
| Salt River Project                                    | $65\%$ reduction in $CO_2$ intensity by 2035, 90% reduction by 2050 (2005 baseline)   |
| Seminole Electric Cooperative Inc.                    | No goal   |
| South Carolina Public Service Authority               | 50% CO <sub>2</sub> reduction by 2030 (2005 baseline)   |
| Southern Company                                      | 50% $CO_2$ reduction by 2030 (2007 baseline); Net-Zero by 2050  |
| Tennessee Valley Authority                            | 70% $\rm CO_2$ reduction by 2030, 80% reduction by 2035 (2005 baseline); Net-Zero by 2050 (aspirational)                              |
| The AES Corporation                                   | Net-Zero electricity production by 2040; Net-Zero company-wide by 2050  |
| Tri-State Generation & Transmission Association, Inc. | $90\%CO_2$ reduction for Colorado generation by 2030, $80\%CO_2$ reduction for Colorado wholesale electricity by 2030 (2005 baseline) |
| WEC Energy Group, Inc.                                | $60\%$ $CO_2$ reduction by 2025, 80% reduction by 2030 (2005 baseline); Net-Zero by 2050  |
| Xcel Energy Inc.                                      | $80\%CO_2$ reduction by 2030 (2005 baseline); 100% carbon free by 2050 (electricity only)   |

## APPENDIX C: PARENT AND OPERATING COMPANIES

The following table outlines the 50 parent companies, 77 affiliated operating companies, and 93 unique owners studied in the report. In some cases, an operating company had more than one unique owner. For example, Buckeye Power Generating LLC and Buckeye Power, Inc. are two unique owners serving one operating company. Of the 50 parent companies, 29 are investor-owned utilities; 12 are generation and transmission cooperatives; six are public power utilities; three are municipal utilities.

| Parent Company                        | Operating Company                               | Owner (per S&P Global)               |
|---------------------------------------|---|--------------------------------------|
| Algonquin Power & Utilities Corp.     | Empire District Electric                        | Empire District Electric Company     |
| Alliant Energy Corporation            | Interstate Power and Light (Alliant)            | Interstate Power and Light Company   |
|                                       | Wisconsin Power and Light (Alliant)             | Wisconsin Power and Light Company    |
| Ameren Corporation                    | Ameren Missouri                                 | Union Electric Company               |
| American Electric Power Company, Inc. | Appalachian Power                               | Appalachian Power Company            |
|                                       | Indiana Michigan Power                          | Indiana Michigan Power Company       |
|                                       | Kentucky Power                                  | Kentucky Power Company               |
|                                       | Ohio Power                                      | Ohio Power Company                   |
|                                       | Public Service Company of Oklahoma              | Public Service Company of Oklahoma   |
|                                       | Southwestern Electric Power Company<br>(SWEPCO) | Southwestern Electric Power Company  |
|                                       | Wheeling Power                                  | Wheeling Power Company               |
| Arkansas Electric Cooperative Corp.   | Arkansas Electric Coop                          | Arkansas Electric Cooperative Corp.  |
| Associated Electric Cooperative Inc.  | Associated Electric Coop                        | Associated Electric Cooperative Inc. |
| Basin Electric Power Cooperative      | Basin Electric Coop                             | Basin Electric Power Cooperative     |

#### APPENDIX C: PARENT AND OPERATING COMPANIES , cont.

| Parent Company                        | Operating Company                                      | Owner (per S&P Global)                    |
|---------------------------------------|--|---|
| Berkshire Hathaway                    | MidAmerican  | MidAmerican Energy Company                |
|                                       | NV Energy - Nevada Power                               | Nevada Power Company                      |
|                                       | NV Energy - Sierra Pacific Power                       | Sierra Pacific Power Company              |
|                                       | PacifiCorp<br>(Pacific Power and Rocky Mountain Power) | PacifiCorp                                |
| Big Rivers Electric Corporation       | Big Rivers Electric Corporation                        | Big Rivers Electric Corporation           |
| Buckeye Power, Inc.                   | Buckeye Power  | Buckeye Power Generating LLC              |
|                                       |  | Buckeye Power, Inc.                       |
| Centerpoint Energy, Inc.              | Centerpoint Energy                                     | Southern Indiana Gas and Electric Company |
| City Public Service of San Antonio    | CPS Energy   | City Public Service of San Antonio        |
| Cleco Partners LP                     | Cleco Power  | Cleco Cajun LLC                           |
|                                       |  | Cleco Power LLC                           |
| CMS Energy Corporation                | Consumers Energy                                       | Consumers Energy Company                  |
| Dominion Energy, Inc.                 | Dominion South Carolina                                | Dominion Energy South Carolina, Inc.      |
|                                       |  | South Carolina Generating Company, Inc.   |
|                                       | Dominion Virginia                                      | Virginia Electric and Power Company       |
| DTE Energy Company                    | DTE Electric   | DTE Electric Company                      |
|                                       |  | DTE Energy Services, Inc.                 |
| Duke Energy Corporation               | Duke Energy Carolinas                                  | Duke Energy Carolinas, LLC                |
|                                       | Duke Energy Florida                                    | Duke Energy Florida, LLC                  |
|                                       | Duke Energy Indiana                                    | Duke Energy Indiana, LLC                  |
|                                       | Duke Energy Kentucky                                   | Duke Energy Kentucky, Inc.                |
|                                       | Duke Energy Progress                                   | Duke Energy Progress, LLC                 |
| East Kentucky Power Cooperative, Inc. | East Kentucky Power Coop                               | East Kentucky Power Cooperative, Inc.     |
| Emera Incorporated                    | Tampa Electric   | Tampa Electric Company                    |
| Entergy Corporation                   | Entergy Arkansas                                       | Entergy Arkansas, LLC                     |
|                                       |  | Entergy Power, LLC                        |
|                                       | Entergy Louisiana                                      | Entergy Louisiana, LLC                    |
|                                       |  | Entergy Power Gas Operations              |
|                                       | Entergy Mississippi                                    | Entergy Mississippi, LLC                  |
|                                       | Entergy New Orleans                                    | Entergy New Orleans, LLC                  |
|                                       | Entergy Texas  | Entergy Texas, Inc.                       |
| Evergy, Inc.                          | Evergy Kansas Central                                  | Evergy Kansas Central, Inc.               |
|                                       |  | Evergy Kansas South, Inc.                 |
|                                       | Evergy Metro / KCP&L                                   | Evergy Metro, Inc.                        |
|                                       | Evergy Missouri West / KCP&L GMO                       | Evergy Missouri West, Inc.                |
|                                       | Westar Energy / KPL                                    | Westar Energy (KPL)                       |
|                                       |  | Westar Generating, Inc.                   |
| FirstEnergy Corp.                     | Monongahela Power                                      | Monongahela Power Company                 |
| Fortis Inc.                           | Tucson Electric Power (TEP)                            | San Carlos Resources Inc.                 |
|                                       |  | Tucson Electric Power Company             |

#### APPENDIX C: PARENT AND OPERATING COMPANIES , cont.

| Parent Company   | Operating Company                                   | Owner (per S&P Global)   |
|--|---|--|
| Fortis Inc., cont.                                       |   | UNS Electric, Inc.   |
| Great River Energy                                       | Great River Energy                                  | Great River Energy   |
|  |   | Rainbow Gas Company  |
| Hoosier Energy Rural Electric Coop Inc.                  | Hoosier Energy Rural Electric Coop                  | Hoosier Energy Rural Electric Coop Inc.                                    |
| IDACORP, Inc.  | Idaho Power   | Idaho Power Company  |
| Intermountain Power Agency                               | Intermountain Power Agency                          | Intermountain Power Agency   |
| JEA  | JEA   | JEA  |
| Lower Colorado River Authority                           | Lower Colorado River Authority                      | GenTex Power Corporation   |
|  |   | Lower Colorado River Authority   |
| Nebraska Public Power District                           | Nebraska Public Power District (NPPD)               | Nebraska Public Power District   |
| NextEra Energy, Inc.                                     | Florida Power & Light (FPL)                         | Florida Power & Light Company  |
|  |   | Gulf Power Company   |
| NiSource Inc.  | Northern Indiana Public Service Company<br>(NIPSCO) | Northern Indiana Public Service Company                                    |
| OGE Energy Corp.   | Oklahoma Gas and Electric                           | Oklahoma Gas and Electric Company  |
| Oglethorpe Power Corporation                             | Oglethorpe Power                                    | Oglethorpe Power Corporation   |
| Omaha Public Power District                              | Omaha Public Power District (OPPD)                  | Omaha Public Power District  |
| Orlando Utilities Commission                             | Orlando Utilities Commission                        | Orlando Utilities Commission   |
| Pinnacle West Capital Corporation                        | Arizona Public Service (APS)                        | Arizona Public Service Company   |
| PNM Resources, Inc.                                      | Public Service Company of New Mexico (PNM)          | Public Service Company of New Mexico                                       |
| Portland General Electric Company                        | Portland General Electric (PGE)                     | Portland General Electric Company  |
| PPL Corporation  | Louisville Gas & Electric and Kentucky Utilities    | Kentucky Utilities Company   |
|  |   | Louisville Gas and Electric Company  |
| Puget Holdings LLC                                       | Puget Sound Energy (PSE)                            | Puget Sound Energy, Inc.   |
| Salt River Project                                       | Salt River Project (SRP)                            | Salt River Project Agricultural Improvement and<br>Power District, Arizona |
| Seminole Electric Cooperative Inc.                       | Seminole Electric Coop                              | Seminole Electric Cooperative Inc.   |
| South Carolina Public Service Authority                  | Santee Cooper                                       | South Carolina Public Service Authority                                    |
| Southern Company   | Alabama Power                                       | Alabama Power Company  |
|  | Georgia Power                                       | Georgia Power Company  |
|  | Mississippi Power                                   | Mississippi Power Company  |
| Tennessee Valley Authority                               | Tennessee Valley Authority (TVA)                    | Tennessee Valley Authority   |
| The AES Corporation                                      | AES Indiana   | AES Indiana  |
|  |   | Caisse de dépôt et placement du Québec                                     |
|  |   | The AES Corporation  |
| Tri-State Generation & Transmission<br>Association, Inc. | Tri-State   | Tri-State Generation & Transmission Association, Inc.                      |
| WEC Energy Group, Inc.                                   | We Energies   | Wisconsin Electric Power Company   |
|  | Wisconsin Public Service (WPS)                      | Wisconsin Public Service Corporation                                       |
| Xcel Energy Inc.   | Xcel Colorado                                       | Public Service Company of Colorado   |
|  | Xcel Minnesota                                      | Northern States Power Company  |
|  | Xcel Texas / New Mexico                             | Southwestern Public Service Company  |

# APPENDIX D: GLOSSARY

AGGREGATE SCORE: The aggregate score is calculated based on the sum of the coal, gas, and clean generation or capacity across all relevant companies, calculated using the methodology outlined in Appendix A.

**CARBON DIOXIDE EQUIVALENT (CO2e):** A metric calculated by converting the global warming potential of non-carbon greenhouse gases, such as methane, to the amount of carbon dioxide that would have an equivalent warming impact over a given timeframe.

**CARBON EMISSION:** A greenhouse gas emitted by the combustion of fossil fuels like coal and gas among other sources.

**CLEAN ENERGY (OR RENEWABLE ENERGY):** Energy generated from renewable sources that do not create emissions when used to generate electricity. For the purposes of this report, only wind and solar were considered clean, renewable power generation sources.

**CLIMATE PLEDGE:** A commitment by a corporation or utility to some form of climate action. These typically take the form of carbon reduction targets, carbon-free energy goals, or net-zero targets. Pledges can be binding, but are typically voluntary or aspirational.

**COAL RETIREMENT:** The complete cessation of coal-burning operations at a coal-powered plant or generating unit. A full transition of a plant from burning coal to gas was considered to be a retirement, but sales of coal plants or units previously planned for retirement to another party (as seen at Coal Creek and Merom plants) were not.

**DISTRIBUTED GENERATION:** Energy generation (and/ or storage) at a small, localized scale, typically residential rooftops.

**ENERGY BURDEN:** The proportion of income spent by a household on energy costs.

**FOSSIL FUEL:** Hydrocarbon based fuels which produce carbon dioxide when burned. For the purposes of this report, these included coal and gas power generation, which constitute the vast majority of fossil fuel power generation in the United States.

**GENERATION AND TRANSMISSION COOPERATIVE (CO-OP):** Utilities (generally in rural areas) that provide power to distribution cooperatives through their own electric generation facilities or by purchasing power on behalf of the distribution members.

**GREENHOUSE GASES (GHG):** Climate-warming gases such as carbon dioxide and methane released from burning fossil fuels among other sources.

**GREENWASHING:** Efforts by utility companies to portray themselves as environmentally friendly (or "green") in order to improve their public image, when in reality their claims are not supported by actions to be environmentally friendly.

**INTEGRATED RESOURCE PLAN (IRP):** Periodic reports released by utility companies outlining their planned course of action over a prescribed planning period.

**INVESTOR-OWNED UTILITIES (IOU):** A privately-owned electric utility that issues stock owned by shareholders. It is rate regulated and authorized to achieve an allowed rate of return.

**MUNICIPAL UTILITY (MUNI):** A public utility owned and operated by the local government or municipality.

**MEGAWATT (MW):** Unit of measurement of electrical power.

**MEGAWATT HOUR (MWH):** Unit of measurement of electrical energy. Equal to one megawatt of generation over an hour. Used to calculate how much electricity a power plant generates or how much electricity a particular area consumes.

#### NATIONALLY DETERMINED CONTRIBUTION (NDC):

A climate action plan to cut emissions and adapt to climate impacts required of each party to the Paris Agreement. For the United States, this is the climate action plan agreed to in 2021 after rejoining the 2015 Paris Climate Agreement, in the form of percentage of carbon emissions reductions relative to 2005 levels.

**NET-ZERO:** The mitigation of all carbon emissions through direct emissions reductions, the purchase of credits or carbon offsets, carbon capture and sequestration, or some combination of these options.

**OPERATING COMPANY:** The regulated utility company that owns the power plants and sells energy to customers.

**OVERBURDENED COMMUNITY:** Minority, low-income, tribal, or indigenous populations or geographic locations in the United States that potentially experience disproportionate environmental harms and risks. The term describes situations where multiple factors, including both environmental and socioeconomic stressors, may act cumulatively to affect health and the environment and contribute to persistent environmental health disparities.<sup>118</sup>

**PARENT COMPANY:** The ultimate owner of an operating company.

**PUBLIC POWER UTILITY:** Community-owned, not-for-profit electric utility. These are often a division of local government.

**PUBLIC UTILITY COMMISSION (PUC):** Governing body that regulates the rates and services of utility companies in its jurisdiction.

**RELIABILITY:** The ability of the electric system to deliver electricity to consumers within accepted standards and in the amount desired.

**DEMAND RESPONSE MEASURES:** Energy or demand reduction strategies employed to level energy use and reduce energy load during times of high demand. Typically employed hand-in-hand with clean energy to improve grid reliability.

**STRANDED COST:** Costs of resources that turn out to be worth less than expected as a result of situational changes. Here this refers to a power plant for which the cost of continuing to own, operate, and maintain the plant exceeds the cost of building a new power plant able to provide equivalent services.

### **ENDNOTES**

- 1 John Romankiewicz, Cara Bottorff, and Leah C. Stokes, <u>The Dirty Truth About Utility</u> <u>Climate Pledges</u>, Sierra Club, 2021.
- 2 The 79 operating companies in our original study are now represented by 77 operating companies due to Florida Power & Light's acquisition of Gulf Power Company and the merger of Louisville Gas & Electric and Kentucky Utilities, which had previously been represented as separate entities.
- 3 Based on S&P Market Intelligence, as of 2021 the companies in this report own approximately 1.3 billion MWh of the approximately 2.4 billion MWh of coal and gas generation in the US.
- 4 Using a 2019 baseline for operating data.
- 5 Using a 2021 baseline for operating data.
- 6 Throughout this report when we refer to "companies" or "utilities" we are referring to operating companies. Data referencing parent companies is labeled as such. See Appendix D for a glossary of terms used throughout the report.
- 7 Based on S&P Market Intelligence and EIA form 923 net generation data for 2020, the latest year for which official EIA data are available. In 2020 total US generation was 4 billion MWh.
- 8 For a definition of aggregate score, see Appendix D.
- 9 <u>Soaring Fossil Fuel Prices This Summer Should Spur Clean Energy Transition</u>, Sierra Club, 2022.
- 10 How Renewable Energy Bolsters the Grid Against Blackouts, Climate Nexus, 2022.
- 11 Inflation Reduction Act Marks a Turning Point in History, Sierra Club, 2022.
- 12 Benjamin Storrow, Why utilities are lining up behind the climate bill, E&E News, 2022.
- 13 IPCC, 2022: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.
- 14 Ibid
- 15 IPCC, 2022: Climate Change 2022: Impacts, Adaptation, and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Polozanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press. In Press.
- 16 Net Zero by 2050: A Roadmap for the Global Energy Sector, IEA, 2021.
- 17 Kelly Trout et al. Existing fossil fuel extraction would warm the world beyond 1.5 °C, Environ. Res. Lett., 2022.
- 18 Dan Tong et al. Committed emissions from existing energy infrastructure jeopardize 1.5 °C climate target. Nature, 2019.
- 19 Dan Esposito, Studies agree 80 percent clean electricity by 2030 would save lives and create jobs at minimal cost, Energy Innovation, 2021.
- 20 Federal Policy for Low-Carbon, High-Renewables Electricity, Evolved Energy Research, 2020.
- 21 Saul Griffith, Sam Calisch, and Laura Fraser, <u>The Rewiring America Handbook: A Guide</u> to Winning the Climate Fight, 2020.
- 22 Amol Phadke and David Wooley, et al. <u>The 2035 Report: Plummeting Solar, Wind, and</u> <u>Battery Costs Can Accelerate Our Clean Electricity Future, University of California</u> Berkeley; GridLab; PaulosAnalysis, 2020.
- 23 A January 2021 survey by Data for Progress found that 63 percent of voters strongly or somewhat support moving the country to a 100% clean electricity grid by 2035 to address climate change and reduce pollution. For polling details see: Danielle Deiseroth, Julian Brave NoiseCat, and Marcela Mulholland, <u>Voters Support 100%</u> <u>Clean Electricity by 2035</u>, Data for Progress, 2021.
- 24 A July 2021 poll published by Third Way, in partnership with University of California -Santa Barbara political scientist Matto Mildenberger, found that the majority of likely voters in all 50 states and all but six of 435 districts in the country support federal action to move toward 100 percent clean electricity. For polling details see: Carly Berke, Lindsey Walter, and Matto Mildenberger, "<u>Americans Support Federal Action to Reach a 100% Clean Energy Grid</u>," Third Way, 2021.
- 25 Catherine Clifford, How Google plans to use 100% carbon-free energy in its data centers by 2030, CNBC, 2022.
- 26 Justine Calma, <u>Big Tech drove record clean energy purchases in 2021</u>, The Verge, 2022.
- 27 Mark Dyson, Alex Engel, Caitlin Odom, and Lauren Shwisberg, <u>Headwinds for US Gas</u> Power: 2021 Update on the Growing Market for Clean Energy Portfolios, RMI, 2021.
- 28 Eric Gimon, Mike O'Boyle, Christopher T.M. Clack, and Sarah Mckee, <u>The Coal Cost</u> Crossover, Energy Innovation and Vibrant Clean Energy, 2019.
- 29 <u>SEC Proposes Rules to Enhance and Standardize Climate-Related Disclosures for</u> Investors, U.S. Securities and Exchange Commission, 2022.
- 30 White House Briefing Room, 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, 2021.
- 31 <u>"White House pushing for 80% clean U.S. power grid by 2030, source says," CNBC,</u> 2021.
- 32 Gianna Melillo, <u>"A look at state efforts to combat climate change in 2022, so far,</u>" The Hill, 2022.
- 33 Energy Solutions for North Carolina, HB 951, Gen. Assembly of North Carolina, 2021.
- 34 EIA 861, Sales by Ultimate Customer, 2020.

- 35 Zoya Teirstein, In a red-state first, Nebraska plans to decarbonize power sector by mid-century, Grist, 2021.
- 36 Table of 100% Clean Energy States, Clean Energy States Alliance, 2022
- 37 IPCC Sixth Assessment Report Press Release, IPCC, 2022.
- 38 <u>"Sources of Greenhouse Gas Emissions Electricity Sector</u>," EPA, accessed 9/2/2022.
- 39 Leah C. Stokes, Short Circuiting Policy, 2020.
- 40 White House Briefing Room, 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, 2021.
- 41 John Bistline, et al. <u>Actions for reducing US emissions at least 50% by 2030</u>, *Science*, 376 (6596), 2022, p. 922–924.
- 42 Ibid
- 43 Nicholas A. Mailloux, David W. Abel, Tracey Holloway, and Jonathan A. Patz, <u>Nationwide and Regional PM<sub>2.5</sub>-Related Air Quality Health Benefits From the Removal</u> <u>of Energy-Related Emissions in the United States</u>, *GeoHealth*, 6 (5), 2022.
- 44 Maninder P. S. Thind, Christopher W. Tessum, Inês L. Azevedo, and Julian D. Marshall, Fine Particulate Air Pollution from Electricity Generation in the US: Health Impacts by Race, Income, and Geography, Environmental Science & Technology 2019 53 (23), 14010-14019 DOI: 10.1021/acs.est.9b02527.
- 45 <u>The Peaker Problem: An Overview of Peaker Power Plant Facts and Impacts in Boston,</u> Philadelphia, and Detroit, Clean Energy Group and Strategen, 2022.
- 46 Christopher W. Tessum, et. al., <u>Inequity in consumption of goods and services adds</u> to racial-ethnic disparities in air pollution exposure, Proceedings of the National Academy of Sciences 2019 116 (13), 6001-6006.
- 47 Raising Awareness of the Health Impacts of Coal Plant Pollution, Clean Air Task Force, 2021.
- 48 Amory B. Lovins and M. V. Ramana, <u>Three Myths About Renewable Energy and the</u> Grid, Debunked, Yale Environment 360, 2021.
- 49 JP Carvallo, Feng Chi Hsu, Zeal Shah, and Jay Taneja, <u>Frozen Out in Texas: Blackouts</u> and Inequity, The Rockefeller Foundation, 2021.
- 50 Jonathan Lloyd, <u>California Weathers Record Electricity Demand Without Major</u> Blackouts, NBC Los Angeles, 2022."
- 51 Ethan D. Coffel and Justin S. Mankin, <u>Thermal power generation is disadvantaged in a</u> warming world, *Environ. Res. Lett.* 16 024043, 2021.
- 52 MEMO: Sierra Club Analysis of Inflation Reduction Act of 2022, Sierra Club, 2022.
- 53 Megan Mahajan, Olivia Ashmoore, Jeffrey Rissman, Robbie Orvis, and Anand Gopal, Modeling the Inflation Reduction Act Using the Energy Policy Simulator, Energy Innovation, 2022.
- 54 Jesse D. Jenkins, et. al., <u>Preliminary Report: The Climate and Energy Impacts of the</u> Inflation Reduction Act of 2022, REPEAT Project, Princeton University Zero Lab, 2022.
- 55 John Larsen et. al. A Turning Point for US Climate Progress: Assessing the Climate and Clean Energy Provisions in the Inflation Reduction Act.
- 56 Jesse D. Jenkins, et. al., <u>Preliminary Report: The Climate and Energy Impacts of the</u> Inflation Reduction Act of 2022, REPEAT Project, Princeton University Zero Lab, 2022.
- 57 Megan Mahajan, Olivia Ashmoore, Jeffrey Rissman, Robbie Orvis, and Anand Gopal, Modeling the Inflation Reduction Act Using the Energy Policy Simulator, Energy Innovation, 2022.
- 58 Jesse D. Jenkins, et. al., <u>Preliminary Report: The Climate and Energy Impacts of the</u> Inflation Reduction Act of 2022, REPEAT Project, Princeton University Zero Lab, 2022.
- 59 Ben King, John Larsen, and Hannah Kolus, <u>A Congressional Climate Breakthrough</u>, Rhodium, 2022.
- 60 This is roughly 10 percent more energy than was consumed in the state of California in 2021, according to the <u>California Energy Commission</u>.
- 61 David Pomerantz and Matt Kasper, <u>Many U.S. electric utilities plan slow</u> <u>decarbonization over next decade, out of sync with Biden plan</u>, Energy and Policy Institute, 2020.
- 62 Company scores do not include potential changes in load due to increased electrification of buildings and vehicles or the potential retirements of other forms of generation like hydro and nuclear, both of which would increase the amount of clean energy needed to achieve a clean electricity grid. The one-for-one swap is a simplification representing the least that a utility needs to do by 2030.
- 63 Includes carbon emissions at the power plant as well as upstream methane emissions. Uses the 20-year global warming potential of methane from IPCC 6AR. Cars calculation uses EPA Greenhouse Gas Equivalencies Calculator.
- 64 In 2020 there were 8.1, 7.8, and 2.5 million registered automobiles in Texas, Florida, and New Jersey respectively. See: U.S. Department of Transportation Federal Highway Administration, Highway Statistics 2020, 2020.
- 65 Mark Dyson, Alex Engel, Caitlin Odom, and Lauren Shwisberg, <u>Headwinds for US Gas</u> Power: 2021 Update on the Growing Market for Clean Energy Portfolios, RMI, 2021.
- 66 Based on S&P Global Market Intelligence as of August 2022. Clean energy includes owned capacity only, not power purchase agreements (PPAs). Data reflect changes between January 1st, 2020 and December 31st, 2021.
- 67 Elizabeth Ross, Megan Day, Christiana Ivanova, Akua McLeod, and Jane Lockshin, Intersections of disadvantaged communities and renewable energy potential: Data set and analysis to inform equitable investment prioritization in the United States, Renewable Energy Focus, 2022.

#### ENDNOTES, cont.

- 68 James Steinbauer, <u>Gas Industry Fuels a Legislative Campaign to Keep Its Fires</u> Burning, Sierra, 2021.
- 69 For example, while Southern Company has announced climate goals, its <u>subsidiaries</u> have said the parent company's goals do not inform their resource planning.
- 70 Inflation Reduction Act, H.R. 5376 § 13101 (2022).
- 71 As noted elsewhere in this report, the scores assigned here do not reflect all aspects of a company's business. While NiSource receives an A based on the factors included in our score, the score does not account for its gas utility. Emissions from NiSource's gas customers at end use are far higher than those from electric generation. Those gas customer emissions are called "scope 3" emissions and are not included in NiSource's climate goals (NiSource Climate Report 2021, page 21).
- 72 Emily L. Williams, Sydney A. Bartone, Emma K. Swanson, and Leah C. Stokes, <u>The</u> <u>American electric utility industry's role in promoting climate denial, doubt, and delay.</u> Environmental Research Letters. 2022.
- 73 David Anderson, Matt Kasper, and David Pomerantz, <u>Utilities Knew</u>, Energy and Policy Institute, 2017.
- 74 Unfortunately, many of the companies in this report own subsidiary gas utilities that distort the incentives for the electric utility segment of their business.
- 75 For example, <u>Duke and Southern Company pointed</u> to historic emissions reductions before the report's timeframe, and <u>AEP pointed</u> to coal plant retirements that happened years ago.
- 76 Robert Walton, FirstEnergy, Duke challenge Sierra Club claims of 'greenwashing' on climate goals, Utility Dive, 2021.
- 77 Nikit Abhyankar, et al. <u>The 2030 Report: Powering America's Clean Economy</u>, University of California, Berkeley; GridLab; Energy Innovation, 2021.
- 78 Dan Esposito, Studies agree 80 percent clean electricity by 2030 would save lives and create jobs at minimal cost, Energy Innovation, 2021.
- 79 Joe Smyth, Financial analysts expect decarbonization will benefit utility ratepayers and shareholders, Energy and Policy Institute, 2020.
- 80 For example, <u>Pacificorp noted</u> it had not pledged to retire their coal plants at "an arbitrary date".
- 81 Paola A. Yanguas Parra et al. <u>Global and regional coal phase-out requirements of the</u> <u>Paris Agreement: Insights from the IPCC Special Report on 1.5°C</u>, Climate Analytics, 2019.
- 82 UN Climate Change News, <u>UN Chief Calls for Immediate Global Action to Phase Out</u> <u>Coal</u>, UNFCCC, 2021.
- 83 Eric Larson et al. Net-Zero America: Potential Pathways, Infrastructure, and Impacts, Final report, Princeton University, 2021.
- 84 James H. Williams et al. <u>Carbon neutral pathways for the United States</u>. AGU Advances, 2(e2020AV000284), 2021.
- 85 Based on S&P Market Intelligence and EIA form 923 net generation data for 2020, the latest year for which official EIA data are available. In 2020 total US generation was 4 billion MWh.
- 86 Susannah Randolph, The Next Era of American Energy Generation, Sierra Club, 2022.
- 87 <u>News Release: NextEra Energy sets industry-leading Real Zero™ goal to eliminate</u> carbon emissions from its operations, leverage low-cost renewables to drive energy affordability for customers, NextEra Energy, 2022.
- 88 While Florida Power and Light had no plans to retire coal in the first report, Gulf Power Company, which legally merged with FPL in 2021, had plans to retire roughly 60 percent of its coal capacity. Gulf Power Company nonetheless received an F in the first report due to its plans to build gas plants rather than clean energy.
- 89 Alissa Jean Schafer, Records Show Senior Florida Power & Light Execs Closely Connected to Election Scandals, Energy and Policy Institute, 2022.
- 90 News Release: NextEra Energy sets industry-leading Real Zero™ goal to eliminate carbon emissions from its operations, leverage low-cost renewables to drive energy affordability for customers, NextEra Energy, 2022.
- 91 Report Release: A Clean Energy Future is Cheaper than Coal for JEA's Customers, Sierra Club, 2022.
- 92 Matthew Griffin, Tampa City Council sets 2035 goal for city's clean energy transition, Tampa Bay Times, 2021.
- 93 Emily Pontecorvo & Brendan Rivers, <u>A Florida city wanted to move away from fossil</u> fuels. The state just made sure it couldn't., Grist, 2021.
- 94 Carbon Report, TVA, 2021.
- 95 Aging Coal Fleet Evaluation, TVA, 2021.

- 96 Bri Knisley, Nikki Luke, Rory McIlmoil, and James Barrett, <u>How investments in</u> renewable and efficient resources could bring thousands of jobs to the TVA region, Appalachian Voices, 2022.
- 97 Environmental Protection Agency, EPA Comments on the Notice of Scoping (NOS) for the Planned Cumberland Project (FERC Docket NO. PF22-2-000), 2022.
- 98 A Resolution recommending TVA pursue solar and storage investments in Middle Tennessee and expressing support to the Nashville Electric Service Board for calling for the same. Metropolitan Government of Nashville & Davidson County, 2022.
- 99 Report Release: TVA Saves Billions By Choosing Clean Energy, Sierra Club, 2022.
  100 Tennessee Valley Authority Urged to Take Advantage of New Tax Credits From Clean
- Energy Bill, Clean Up TVA!, 2022.
- 101 Building A New Gas Plant will leave TVA customers on the hook for hundreds of millions of dollars in stranded costs, Sierra Club, 2022.
- 102 TVA Issues One of the Nation's Largest Requests for Carbon-Free Energy, TVA, 2022. 103 All ranked by capacity.
- 104 In 2020, Clean Air Task Force released an update to their Toll From Coal analysis which models the change in ambient PM<sub>2.5</sub> and associated premature mortality from 2019 air pollution emissions (SO<sub>2</sub>, NO<sub>x</sub>, and PM) for each coal plant. In this model, TVA's Cumberland, Gallatin, Kingston, and Shawnee plants together were responsible for 240 premature deaths due to PM<sub>2.5</sub> air pollution in 2019. Sierra Club analysis of Clean Air Task Force data estimates that coal generating units lacking a planned retirement date in this decade (before 2031) are still responsible for over 4,000 premature deaths per year. When attributing these premature deaths to the parent company which owns these coal plants, TVA ranks highest.
- 105 TVA, Form 10-K, 2021.
- 106 Duke Energy Ohio is not included as its directly owned generation is very small in comparison to its annual retail sales.
- 107 This is based on a weighted average of the 2018 capacity factors of operating gas plants (as of March 2020) in the same state and of the same technology type.
- 108 Includes carbon emissions at the power plant as well as upstream methane emissions. Uses the 20-year global warming potential of methane from IPCC 6AR. Cars calculation uses EPA Greenhouse Gas Equivalencies Calculator.
- 109 In 2020 there were 3.4 million registered automobiles in North Carolina. See: U.S. Department of Transportation Federal Highway Administration, <u>Highway Statistics</u> 2020, 2020.
- 110 Tyler Fitch, Jon Tabernero, and Divita Bhandari, <u>Carbon-Free by 2050</u>, Synapse, 2022.
- 111 Ibid.
- 112 Ibid.
- 113 Duke Energy, <u>Achieving a Net Zero Carbon Future: Duke Energy 2020 Climate Report</u>, 2020.
- 114 We excluded two utilities (Pacific Gas and Electric and Los Angeles Department of Water and Power) from the top 50 due to their significant amount of coal and gas purchased from power purchase agreements or bulk market purchases, which we did not account for in the scope of this study.
- 115 Based on S&P Market Intelligence, as of 2021 the companies in this report own approximately 1.3 billion MWh of the approximately 2.4 billion MWh of coal and gas generation in the US.
- 116 S&P Global Market Intelligence; SNL Energy Data.
- 117 John Romankiewicz, Cara Bottorff, and Leah C. Stokes, <u>The Dirty Truth About Utility</u> Climate Pledges, Sierra Club, 2021.
- 118 EJ 2020 Glossary, United States Environmental Protection Agency, 2020.

Sierra Club National 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5500 Sierra Club Legislative 50 F Street, NW, Eighth Floor Washington, DC 20001 (202) 547-1141 facebook.com/SierraClub instagram.com/SierraClub twitter.com/SierraClub



EXPLORE, ENJOY, AND PROTECT THE PLANET. SIERRACLUB.ORG