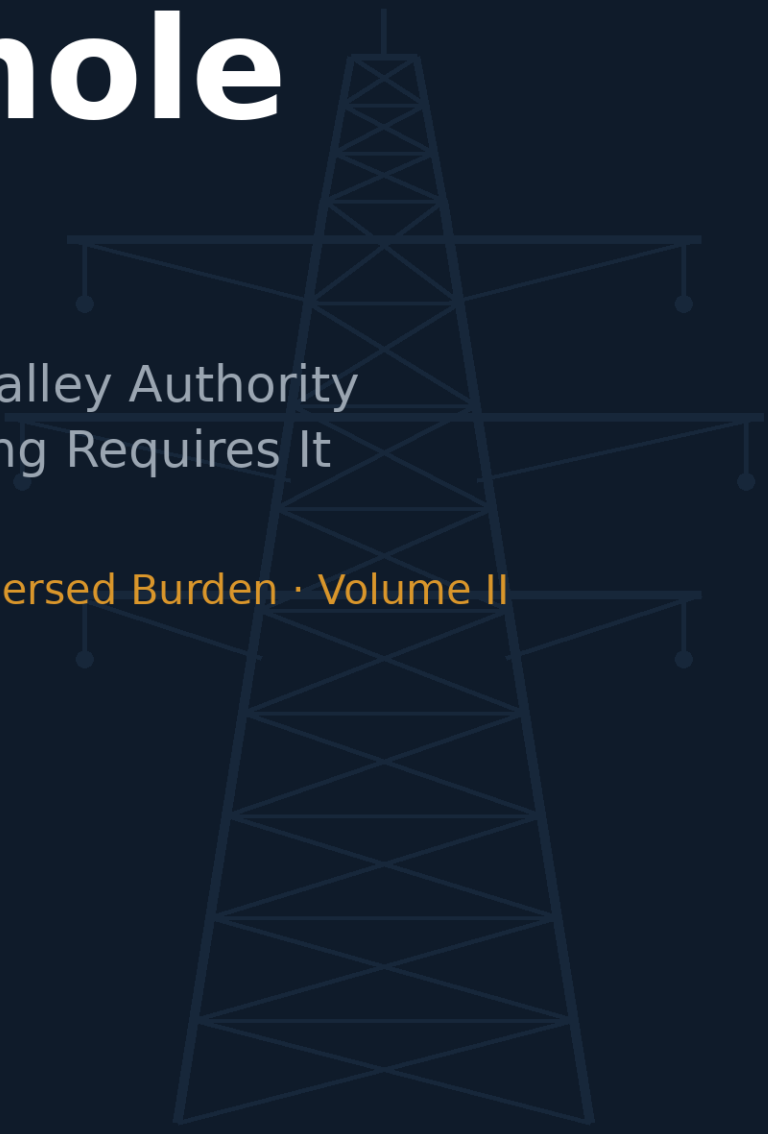
INDEPENDENT ANALYSIS

The Whole Record

What the Tennessee Valley Authority Publishes When Nothing Requires It

Concentrated Benefit, Dispersed Burden · Volume II



Prepared by Tommy N. Turner

Williamsburg and Christiansburg, Virginia

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On method. This volume enumerates what it has not established. Appendix F carries both lists: the ninety-five endnotes flagged as open, and the working files cited here that are not in the deposit.

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CONTENTS

The Whole Record....2
SUGGESTED CITATION....3
CONTENTS....4
ABSTRACT — Executive Summary....13
No external body decides....13
TVA publishes the register, not the checklists....13
What the pages say....14
The same institution, the other channel....14
The burden, and who pays for it....15
Four cases....15
What this volume does not claim....15
Introduction....16
The file name....16
What TVA is....16
What this volume measures, and what it found....17
What has already been said, and by whom....19
The oldest description is still the best one....20
What this volume does not claim....21
The record problem, and what was done about it....22
How the volume is arranged....23
PART I — THE MISSING FORUM....24
Chapter 1 — A Federal Corporation Sites Its Own Lines....25
1.1 The claim, stated carefully....25
1.2 Why Tennessee has no certificate requirement....26
1.3 Why FERC does not set TVA's rates or plan its transmission....27
1.4 The Board sets the rates, and no court will look at them....28

1.5 TVA reviews itself under NEPA, under procedures it wrote....29
1.6 The distributors did not agree to any of it....30
1.7 The one hearing a landowner is guaranteed....30
1.8 What Virginia does instead....31
1.9 Every remaining forum, and what each one is not....31
1.10 What follows....32
Endnotes....33
Chapter 2 — What Takes the Place of a Proceeding....35
2.1 The virtual open house....35
2.1A Where the notice points....35
2.2 What it is not....37
2.3 The thirty days against the years....37
2.4 What actually changed a route....38
2.5 The one proceeding that exists....38
2.6 What the condemnation did not wait for....39
2.7 What a landowner actually has....39
Endnotes....40
PART II — THE RECORD TVA PUBLISHES....44
Chapter 3 — TVA Publishes the Register, Not the Checklists....45
3.1 The list of projects that need no review....45
3.2 What TVA actually determined, project by project....47
3.3 What the register shows, and what it does not....49
3.4 The exclusion that is not used....50
Endnotes....50
Chapter 4 — The Census....54
4.1 Forty projects....54
4.2 The template....54

4.3 What eight of eighteen say, and ten do not.....56
4.4 The other fields, counted.....57
4.5 The pages are configured not to be found.....57
4.5A Two things the coding turned up.....58
4.6 A page that exists and is not listed.....59
4.7 What the census is for.....59
Endnotes.....60
Chapter 5 — The Disclosure Test.....63
5.1 The test.....63
5.2 The sentence.....63
5.3 The one that names a customer.....64
5.4 The outlier.....65
5.5 How close the near misses get.....65
5.6 What appears nowhere.....66
5.6A The other thing the page does not name.....66
5.7 The exception the chapter has to concede.....67
5.8 Generation that no document identifies.....67
5.8A Three coding decisions that move the count.....68
5.9 What the test establishes.....68
Endnotes.....69
Chapter 6 — The Record Nobody Is Directed To.....71
6.1 One file name.....71
6.2 What TVA publishes, and how much of it.....71
6.3 The naming pattern.....72
6.4 The customers TVA names in its own files.....72
6.5 The within-institution contrast.....74
6.6 What the name does and does not prove.....75

6.7 The line that has a name and no page....76
6.8 Against the census....77
6.9 Why this is fixed in an archive....78
Endnotes....79
Chapter 7 — The Register and the Queue....90
7.1 Two lists....90
7.2 The falsification test....90
7.3 What survives, and the field that made the first count wrong....90
7.4 Project identifiers are not a key....92
7.5 Identifier blocks give a rough chronology....92
7.6 It is a queue, not a vault....93
7.7 Two published pages with no register record....94
7.8 What should be requested....94
Endnotes....94
PART III — MEASURING THE BURDEN....96
Chapter 8 — Corridor Measurement....97
8.1 What Virginia cost, and what Tennessee gives away....97
8.2 Nearly half the register is duplicated....97
8.2A A field that does not announce what it measures....97
8.3 The headline figures....98
8.4 The ratio....99
8.5 The projects with no selected route, and how many of them are actually finished..100
8.5A 109 North, and the ratio it does not have....101
8.6 Where the arithmetic is soft....101
8.7 What this measurement does not require....102
Endnotes....103
Chapter 9 — Who Pays, and Where the Money Does Not Go....108

9.1 The comparison....108
9.2 The federal formula is state-level on both factors....108
9.3 Tennessee's redistribution ignores transmission entirely....109
9.3A The one impact payment, and the four words that exclude transmission....110
9.4 The direct county payments are a legacy make-whole....110
9.5 Nobody publishes what a county carries....111
9.6 What this means for a host county....111
9.6A The two terms, defined, because the series title asserts them....111
9.7 Two things this chapter does not establish....112
Endnotes....113
PART IV — CASES....115
Chapter 10 — Sumner County....116
10.1 What TVA told the newspaper....116
10.2 The customer....117
10.3 Two lines, and only one of them is about Meta....117
10.4 Towers built for something that does not exist on paper....118
10.5 The route that moved....119
10.5A The only determination on the record is for soil borings....120
10.6 What the public conversation was about....120
10.7 The record was never altered....121
10.8 What remains unestablished....122
Endnotes....122
Chapter 11 — Maury County....125
11.1 A line with a name and no page....125
11.2 How it came to be published....126
11.3 Whose name it is....127
11.4 The comparison that makes it an argument....127

11.5 What Maury County looks like in TVA's other files.....128
11.6 Where this leaves the reader.....128
Endnotes.....128
Chapter 12 — Cheatham and Robertson.....134
12.1 Ten dollars.....134
12.2 The project.....134
12.3 The review that was never published.....135
12.4 What is left.....136
12.5 Segmentation, described by the person it was done to.....136
12.6 A third party still holding the land.....137
12.7 What is not in these counties.....137
Endnotes.....138
Chapter 13 — Lowndes County, Mississippi.....150
13.1 Two sources, one article, one day.....150
13.2 CINCO.....150
13.3 The project with no page.....151
13.4 The published line into the same substation is on hold.....152
13.5 What is not known, stated as not known.....152
13.6 The corridor is filling regardless.....153
13.7 Why Mississippi belongs in a Tennessee volume.....153
Endnotes.....155
PART V — WHAT REMAINS.....168
Chapter 14 — What This Volume Could Not Resolve.....169
14.1 Why the gaps are listed.....169
14.2 The six projects with no located determination.....169
14.3 Why some projects get a page and some do not.....170
14.4 The confidentiality question, still open.....170

14.5 The easement question behind Chapter 9 170
14.6 The ten dollars 170
14.7 The denominator, and what closed it 171
14.8 The Virginia comparison, and what the dockets show 172
14.9 Two reading gaps, stated because they are load-bearing 173
14.10 What was not asked of TVA, and why 173
Endnotes 174
Chapter 15 — What the Record Shows 176
15.1 What the record shows, at the size it will bear 176
15.2 What the volume establishes, in order of how hard it is to argue with 176
15.3 What is inference, and marked as such 177
15.4 What is not proven, stated so nobody has to guess 178
15.5 Why a missing docket is not merely fewer documents 178
15.6 What would change it 179
15.7 What is left for whoever comes next 180
Endnotes 180
Appendix A — The Tennessee Project Census, Coded 182
A.1 Summary table 184
A.2 Counts 186
A.3 Stated purposes, verbatim 187
A.4 Owner and parcel counts 192
A.5 Field-by-field detail, deposited as data 194
A.6 Notes and anomalies 194
Appendix B — The Register and the Website 199
B.1 What this appendix is for 199
B.2 How TVA names the same project twice 200
B.3 The register 200

B.4 What the table shows....207
B.5 Two entries that acquired pages while this research was underway....208
B.6 How to use this for research on a project the website does not list....208
Appendix C — Reproducibility....210
C.1 The standard this appendix is trying to meet....210
C.2 Retrieval....210
C.3 Deduplication....211
C.4 Length: the field that inflates it....212
C.5 The cross-layer join, the null-key collision, and the artifact it produced....212
C.6 Known soft spots....214
C.7 The code....214
C.8 What this cost....215
Appendix D — The Archive, and Why It Exists....216
D.1 The problem this appendix answers....216
D.2 What is in the deposit....217
D.3 The full manifest....218
D.4 What was deliberately not captured....222
D.5 Capture times and filenames....223
D.6 Which pages are deposited, and which are not....223
D.7 Publication status....223
D.7A Why this volume points at its evidence....224
D.8 How to check a figure against this deposit....224
D.9 Addendum, 24 August 2026: nineteen captures not yet deposited....225
D.10 Addendum, 26 August 2026: one further capture....229
Appendix E — The Generation Siting Layer: Method, Field Traps, and What Was Deliberately Not Captured....230
E.1 The dataset....230

E.2 Every record is at the same study phase.....230
E.3 Two field traps, recorded because they invite the error.....231
E.4 What is in the records, and why none of it is reproduced.....231
E.5 The unit.....232
E.6 The asymmetry, stated at the size the evidence now supports.....232
Endnotes.....233
Appendix F — What This Volume Has Not Established.....234
F.1 Open items.....234
F.2 Cited and not deposited.....236
ABOUT THE AUTHOR.....237

ABSTRACT — Executive Summary

The Whole Record. Concentrated Benefit, Dispersed Burden — Volume II. Evidence snapshot 18 August 2026, with nineteen sources captured 24 August 2026 at Appendix D §D.9 and one captured 26 August at §D.10.

No external body decides

The Tennessee Valley Authority is a corporation owned by the United States. It builds transmission lines across seven states, and no external body decides whether any of them are needed or where they go.

No state commission issues a certificate: Tennessee's public utility statute excludes federal instrumentalities by definition. The Federal Power Act exempts TVA on its face. Its transmission tariff is a document its own Board approved in 1996 and never filed with FERC. Its rates are not judicially reviewable. The federal government's own auditor reported this to Congress in 1982, told Senator Sasser that "the TVA Act does not require public involvement or information programs," listed statutory amendments that would change it, made no recommendation, and nothing was enacted.

TVA is also its own lead agency for environmental review, under procedures it wrote.

TVA publishes the register, not the checklists

TVA publishes registers of completed categorical exclusion checklists — eight documents, 27 April 2020 to 31 March 2026, **11,899 entries**, each naming a project and the exclusion applied.

Nine of the eighteen Tennessee projects have a located line-level determination, and every one is exclusion 16. None used exclusion 17. None used exclusion 19, which was invoked eleven times in six years, eight of them for demolition. Exclusion 16 covers new transmission construction "generally no more than 10 miles in length," with no voltage threshold; its 125-acre right-of-way cap binds at 10.3 miles for a 100-foot corridor.

Two lines were assessed rather than excluded. Bristol and North Dayton both exceed ten miles and both received an environmental assessment and a finding of no significant impact, which is the best evidence available that TVA observes its own ceiling.

Six have no located determination of any kind; three of the six are the three longest projects on the list, and a fourth, Dickson, is the fifth longest. The sharpest is 109 North, whose only entry in the entire series is a determination for soil borings.

And for every determination the register establishes *that* an exclusion was applied and *when*. It establishes nothing about the mileage counted, the acreage credited against the 125-acre limit, or the extraordinary-circumstances screen the regulation requires. There is no such column, and no approving official is named on any of the 11,899 rows.

A revision effective 21 January 2026 removed the requirement to circulate a draft assessment for comment and removed the minimum comment periods. TVA now asks for comment on an assessment at its sole discretion; when it does, it must respond in the document only to comments it judges substantive, and need not respond to anything filed outside the window it sets.

What the pages say

Sixteen of eighteen Tennessee project pages state a purpose naming no customer and no load type; fourteen carry identical template language. One names its customer.

No megawatt figure appears anywhere on any of the eighteen. Not a load figure, not a project capacity, not a transfer capability.

Owner counts stop in 2023. Eight pages tell property owners how many of them there are, 1,469 owners across 2,089 parcels. Every page opened since is silent.

The Environmental Reviews section identifies no document on any page, including the two where a document exists. Bristol has an assessment and a finding, and its section carries the boilerplate and nothing else. The boilerplate is not a placeholder awaiting review. It is invariant to whether review happened.

The pages are not thin. They carry route alternatives, right-of-way widths, structure types, schedules, maps and a named engineer's direct line. What thins out is the field that would let a landowner assess who benefits.

The same institution, the other channel

TVA publishes 302 feature services through a public ArcGIS organisation, queryable without a credential. One is named `Facebook_North_Gallatin_Alternative_Transmission_Line_Route`. The public page for that line tells Sumner County property owners it is "to provide power for growing load and increase power reliability in the Gallatin area."

Seven services carry the name **Fiberon** — the one Tennessee page that does name its customer. Named in the files and named on the page; named in the files and not on the page. A contrast inside one institution's own file names, requiring no inference about motive.

It is a demonstration and not a practice. Of the three projects with a nameable customer, TVA named one, and in both unnamed cases the name was already public before TVA wrote the page.

The missing forum does not explain the missing name. Eighteen Dominion Energy Virginia pages, coded against the same three codes, name an end-use customer on **none of the eighteen** — from a utility that files a full adversary certificate case. The utility with the forum names fewer customers than the utility without one. The dockets behind those pages name a large-load customer in three of the eight projects that had one and point to one in a fourth (§14.8).

The burden, and who pays for it

TVA studies 2.63 miles of route for every mile it selects — 1,358.1 studied against 515.6 selected, across the 46 projects appearing in both published route layers. Computed from TVA's own geometry and reproducible from the deposited code.

No located provision of the formula credits a Tennessee county for hosting a transmission line. Virginia taxes the asset. Tennessee counties may not tax TVA property at all, and the federal payment that replaces the tax is apportioned by state, then redistributed by population, land area and acres of TVA-*owned* land. A right of way is an easement. The one construction-impact payment is written for facilities "to produce electric power."

Four cases

Sumner County. A line whose August 2026 update commits to towers sized for a future 500-kV circuit "as electric generation is added in the area." Its route was abandoned across a 239-year-old farm after public opposition, long after the only formal opportunity to be heard had closed.

Maury County. A 1.1-mile line with no project page, no comment period and no environmental document to inspect. TVA's published environmental record for it is one register row, carrying the customer's private project name.

Cheatham and Robertson. TVA took survey access to two families' land, estimating compensation at **ten dollars**, for a project whose environmental impact statement was never published.

Lowndes County, Mississippi. In one article on one day, TVA described a new line as providing "increased reliability" while the regional development agency named the customer.

What this volume does not claim

It does not claim the North Gallatin line was built for Meta. It does not claim to have discovered the connection; a local paper had it in 2021. It does not claim TVA conceals information wholesale, or that the unpublished projects are hidden. And it does not claim TVA acted unlawfully anywhere.

Every practice described here is within its authority. That is the point.

Appendix F enumerates the open items this volume has not closed. Chapter 14 states what could not be resolved and what would close each gap; the request language is published separately as the companion guide.

Introduction

The file name

The Tennessee Valley Authority publishes a map service called:

```
Facebook_North_Gallatin_Alternative_Transmission_Line_Route
```

It is public, requires no credential, and has been there since 23 December 2020. The web map beside it, the one embedded in TVA's own project page, carries the public tag `Facebook North Gallatin Virtual Open House`.

The project page those files belong to tells property owners in Sumner County, Tennessee, that TVA is building the line "to provide power for growing load and increase power reliability in the Gallatin area."

Both statements are published by the same federal corporation, about the same line, on the same website's infrastructure. One identifies a customer. The other is the one the people whose land the line crosses are directed to, and it identifies no one.

This volume is about the gap between them, and about why nothing exists to close it.

What TVA is

The Tennessee Valley Authority is a corporation owned by the United States. It generates and transmits electricity across seven states and sells wholesale to 153 local power companies. It also sits outside almost every mechanism that constrains an ordinary utility.

No state commission issues a certificate for a TVA transmission line. Tennessee's public utility statute excludes federal instrumentalities by definition, and a state could not reach TVA anyway without a congressional waiver that the TVA Act does not contain. The Federal Power Act exempts TVA on its face, so FERC does not set its rates or plan its transmission. TVA's transmission tariff is a document its own Board approved in 1996 and never filed with FERC. Its rates are set by that Board and are not judicially reviewable, a doctrine the Fourth Circuit reaffirmed in 2022. It is its own lead federal agency for environmental review, under procedures it wrote, and for half the lines in this volume it has determined, by categorical exclusion, that no environmental assessment is required.

That determination is published, and this volume cites it. TVA posts eight lists of completed categorical exclusion checklists covering 27 April 2020 to 31 March 2026 — 11,899 determinations, each naming a project and the exclusion applied. What none of the eleven thousand rows records is the reasoning. TVA publishes the register of completed checklists and not the checklists, so the public record shows *that* a line needed no review and *when* that was decided, and never why. Chapter 3 sets out the eighteen project by project.

Where there is no proceeding, there is no docket. Where there is no docket, there is no filing to read, no party with standing, and no record that survives independent of the institution that made it.

What TVA offers instead is a thirty-day virtual open house that produces no response document, and a condemnation action in which the only contested question is price.

What this volume measures, and what it found

This is a record of measurements. What TVA publishes about eighteen Tennessee transmission projects was coded, counted and compared against a matched set from a utility that files a siting case, and the searches, bounds and grades are stated wherever a count appears.

The findings are summarised in one sentence: TVA's substitute for a siting proceeding is a thirty-day open house that produces no record, and the page it leaves behind names the burden and not the beneficiary. That sentence is a summary and not a premise; nothing below depends on it, and each finding stands or falls on its own evidence. The notice mailed to a property owner invites him to a virtual open house with a closing date printed on it. Nothing follows it: no comment-response document, no summary, no count of what was submitted. What remains is a project page that states route, mileage, right-of-way width and, on eight of eighteen, how many owners and parcels are affected, while leaving the beneficiary, the load type and the scale of load unstated.

None of it needs an inference about motive, and Chapter 15 §15.4 states the general propositions this volume does not make. Its first half rests on what TVA publishes about its own open houses, set out at Chapter 2 §2.1A and §2.2: the closing date printed beside the address, and the absence of any comment-response document, summary or count afterwards. Its second half rests on the pages themselves, measured, and on a contrast inside TVA's own files: seven services in TVA's engineering catalogue carry the name **Fiberon**, a decking manufacturer in Maury County, and the Fiberon project page names the customer in its title. One service carries the name **Facebook**, and the North Gallatin page names no one.

What the contrast does and does not establish. It proves that the same institution can preserve a customer identity in one channel and omit it from the other. It does not prove a practice. This volume does not claim that TVA "maintains a customer-naming convention, applies it across a decade and dozens of projects, and publishes the customer's identity to affected landowners in some cases and not others." A search of independent public records for all eighteen projects establishes that **three had a specific identifiable end-use customer TVA could have named.** Eleven have a positive, locatable general driver: reliability, aging asset replacement, area load growth. The practice claim has no denominator to stand on.

What survives is narrower and much harder to attack. **Of the three projects with a nameable customer, TVA named one. In at least two of the unnamed cases the**

customer's name was already public before TVA wrote the page — Meta's own announcement of 12 August 2020 and the *Tennessee Star* of 20 February 2021 for North Gallatin, and the state's economic development announcement of 7 December 2021 for Cates Landing.

And the missing forum does not explain the missing name. Eighteen Dominion Energy Virginia project pages, coded against the same three codes, name an end-use customer on none of the eighteen — and Dominion files a full adversary certificate case at the State Corporation Commission. The utility with the forum names fewer customers than the utility without one. What the forum produces is a record the page can point to. Fourteen of Dominion's eighteen pages carry an SCC case number, and where a project had a large-load customer, the docket names one in three of eight and points to one in a fourth, while the pages name none (§14.8). TVA has nowhere to point. That is the difference this volume measures, and it is why the pages matter.

The forum does not produce disclosure.
It produces a pointer.

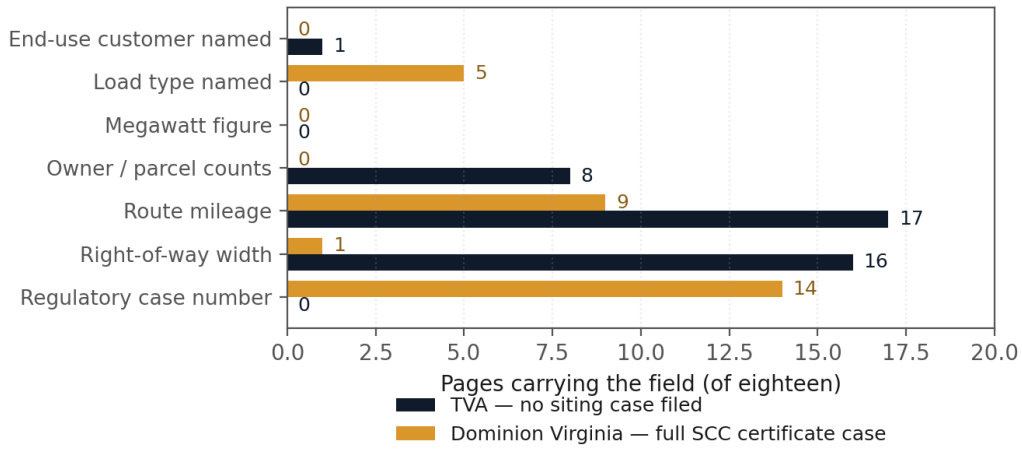


Figure 1. *Eighteen TVA project pages and eighteen Dominion Energy Virginia project pages, coded against the same three codes. Dominion files a full adversary certificate case at the Virginia State Corporation Commission; TVA files none.*

The measurements, all computed from data TVA publishes and none previously reported:

- **Sixteen of eighteen** Tennessee project pages state a purpose naming no customer and no load type. The eighteen are every Tennessee project TVA's index lists, and Appendix A records two Tennessee projects it does not, to which the Middle Tennessee Generation and Transmission page is a third. All sixteen use near-identical template language, fourteen of them word for word. One names a customer.
- **No megawatt figure appears anywhere** on any of the eighteen pages.

- TVA studies **2.63 miles of route for every mile it selects** — measured across the forty-six projects that appear in both of TVA's published route layers — a figure computable because TVA publishes route geometry.
- Its generation siting dataset places **151,858 tax parcels**, with owner names and mailing addresses, inside its areas of interest across fourteen Tennessee counties.

What has already been said, and by whom

The condition this volume measures was described by the federal government's own auditor in 1982, and nothing was done about it. The General Accounting Office reported to Senator Jim Sasser that "the TVA Act does not require public involvement or information programs" and that TVA's programmes are "voluntarily [*sic*] and at the discretion of the Board." Drawing the comparison to investor-owned utilities, GAO reached for siting as the paradigm case: private utilities face "State rate review and approval hearings **and State hearings on the siting of new power plants**." Consumer groups told GAO the input they were offered "was felt to be a token effort because the Board had already 'made up its mind.'" GAO listed statutory amendments requiring records of decision and public-involvement guidance, set them out as options and made no recommendation, in the report's own phrase "As agreed with your staff," and neither was enacted. Chapter 1 §1.1 sets it out.

That report does two things for this volume. It removes any suggestion that the missing forum is a novel finding — it is a forty-four-year-old published one. And it sharpens what is left to do, because GAO described a condition and did not measure what the condition produces in the documentary record. That measurement is this volume.

Shelley Welton, Levi Phillips and Nikki Luke published the structurally identical argument about a different TVA function thirteen months before this volume.

"Not Just Another Utility": The Tennessee Valley Authority and Public Power in the Energy Transition, 110 Iowa Law Review 2233 (2025), argues that TVA's accountability structure is "incoherent, ineffective, and deficient in realizing the democratic ethos of the TVA Act." They demonstrate it through integrated resource planning, and their description of the process will be familiar to anyone who reads Chapters 1 and 2 of this volume:

> "In place of intervention opportunities or robust formal hearings, TVA relies largely on a twenty-four-person 'IRP Working Group' … with membership by invitation only and subject to non-disclosure. TVA at times holds discretionary public hearings but not formal, adversary hearings with the ability to present evidence and expert witnesses."

They also record TVA's practice of letting NEPA notice-and-comment stand in for regulatory process, and quote a regional advocate's judgment that TVA has "the least public planning process of any utility in the United States."

This volume is an extension of theirs and says so at the outset. Four things siting adds:

Land is taken. Resource planning does not condemn anyone's property. Siting does, from owners who have refused to sell, at a price the Board deems fair, after title has already passed.

The burden is located and permanent. A plan can be revised at the next cycle. A corridor is a physical fact on identifiable parcels, and the volume measures it in miles and counts it in owners.

The disclosure is countable. Welton and colleagues describe a process. This volume codes an output — eighteen pages, one field, three categories — and reports the distribution.

The engineering record is public. TVA publishes the files that name the customers. Nobody had read them.

The division of labour is cleaner than the ordinary courtesy of a literature review would suggest, and the full text was checked to be sure of it. Across all forty-four pages of the Essay and its 295 footnotes, the words *siting*, *eminent domain*, *condemnation*, *corridor*, *right-of-way*, *routing* and *land acquisition* do not appear once. Transmission enters their argument as a question of ownership and access — who may use TVA's wires, and whether TVA should be reduced to a wires company — never as a question of where a line goes or whose land it crosses. Data centres appear in a single footnote.

Three further honesties belong here.

TVA's rate unreviewability is thoroughly established in the case law and is not presented as a discovery.

The categorical exclusion argument in Chapter 3 was made nine years ago. In September 2017 the Southern Environmental Law Center and seventeen other organisations filed comments on TVA's proposed NEPA rule that identified the transmission exclusions by number and made the segmentation point in terms this volume can only restate. They did not prevail, the text did not change, and when the rule was reopened in 2026 nobody filed again. That sequence is the finding, not the argument.

And the volume's search found no scholarship on the "virtual open house" as an instrument, in any agency context, which is stated as an absence of findings rather than proof of absence.

The oldest description is still the best one

Philip Selznick studied TVA's participation machinery and published the result in 1949. He was writing about the agricultural programme, not about siting, but the sentence that made the book famous describes the thing this volume examines:

> "cooptation is the process of absorbing new elements into the leadership or policy-determining structure of an organization as a means of averting threats to its stability or existence."

And, of the arrangements that do it: **“often the realistic core of avowedly democratic procedures.”**

A thirty-day comment window that generates no record, admits no parties, and answers nobody is formal cooptation in Selznick’s precise sense. That the canonical account was written about this institution seventy-seven years ago, and still fits, is the most economical way to say what has and has not changed.

What this volume does not claim

It does not claim the North Gallatin line was built for Meta. TVA has never said so, the geometry does not prove it, and the chapter that comes closest quotes a TVA spokesperson saying the project would support “the increasing load in the area for many customers,” a phrase the reporter then extends to the data centre. That is an inclusion rather than an identification, and the connective is the reporter’s word rather than TVA’s.

It does not claim to have discovered the connection. On 20 February 2021, seven weeks after TVA opened the North Gallatin project, the *Tennessee Star* ran the story under a headline beginning “Proposed Tennessee Valley Authority Transmission Line to Service New Facebook Data Center.” Laura Baigert’s opening sentence names the customer, gives the property-owner and parcel counts TVA had published, and makes the landowner-burden argument. That is five and a half years before this volume, in a local outlet, on the public record.

The concession costs the volume nothing and clarifies what it is claiming. The customer’s identity was not confidential, was not difficult to obtain, and was in print within two months. TVA left it off the page anyway, and has left it off for five years since. What is new here is not the fact. It is that the omission can be counted across eighteen projects, and that TVA’s own engineering files record what its landowner-facing pages do not.

And it does not treat the two Gallatin projects as one. North Gallatin is a 5.7-mile double-circuit line with a new 161-kilovolt substation, routed in 2021, adjacent to Meta’s campus. The 109 North project is a separate line of under four miles, opened in 2024 and still unrouted, which is where the Gregory family’s farm is. The Facebook service name belongs to the first. No source connects the second to any data centre, and this volume does not connect them either. Chapter 10 keeps them apart deliberately, because collapsing them would be the easiest way to discredit the chapter.

It does not claim TVA conceals information wholesale. The project pages are detailed — route alternatives, right-of-way widths, structure types, schedules, maps, a named engineer’s direct line. Compared with a great deal of utility outreach they are generous. What thins out is specific: owner counts vanish after 2023, per-alternative mileage appears **twice** in eighteen, and customer identity appears once in eighteen.

It does not claim the unpublished projects in TVA’s register are hidden. Two of them acquired public pages while this research was underway. The register runs ahead of the website, which is what a register is for.

And it does not claim TVA acted unlawfully anywhere. Every practice described here is within its authority. That is the point.

The record problem, and what was done about it

Virginia's evidence was filed. An SCC certificate case exists independently of the applicant, and anyone can retrieve it a decade later.

TVA makes no siting filing. Its transmission disclosures are web pages and web services under its sole control, revisable without notice, with no docketed version and no third party holding a copy. The argument in Chapter 6 rests on a service name TVA could change in under a minute.

All eighteen project pages also carry `meta-robots: noindex`, which instructs a compliant crawler not to index the page, with a canonical tag — itself advisory rather than binding — naming the parent index as the authoritative version. What is established is the instruction TVA gave on every page, not the result of any particular search; Chapter 4 §4.5 and note 17 state the narrowing.

On 16 August 2026 the Internet Archive declined to archive tva.com: "We're currently facing some limitations when it comes to archiving this site." It holds captures of these pages through April 2025, so the limitation is recent.

The response was to become the custodian. Every dataset, service definition, layer schema and page quoted in this volume has been retrieved and hashed. Fifty-eight files, 3,416,780 bytes, are deposited; a further nineteen captures made on 24 August 2026 are held and manifested and are not yet in the deposit, with one more made on 26 August at §D.10, and Appendix D §D.9 lists them and states what each does and does not verify. The deposited fifty-eight include all eighteen Tennessee project pages and, added on 18 August, the eighteen Dominion Energy Virginia pages used as a control. Appendix D §D.6 states which pages are in the deposit and which are not. **One thing about the deposit should be said here and not only in the appendix.** It was published on 18 August 2026 and carries two DOIs: 10.5281/zenodo.21959989 resolves permanently to version 1.0, the state of the evidence this volume was written against, and 10.5281/zenodo.21959988 resolves to whatever the latest version is. Citations here use the version DOI, because a later version will hold different files. Appendix D §D.7 states the position and Appendix D is the manifest. Citations point to the deposited file and its SHA-256, with the live endpoint given for verification and the understanding that it may no longer return what is quoted here.

That is an unusual thing to have to explain in a volume about public disclosure, and it follows from the subject.

How the volume is arranged

Part I — The Missing Forum. What TVA is, legally, and why no external body adjudicates the need for its lines or the route they take (1). What stands in place of a proceeding, and the ten dollars TVA estimated as compensation for entering two families' land (2).

Part II — The Record TVA Publishes. TVA's own exclusion register of completed categorical exclusion checklists, 11,899 determinations across six years, and what it establishes about the eighteen Tennessee projects: nine with a located determination, every one under exclusion 16; two assessed instead; six with none of any kind; and Columbia (Fiberon), whose determination is probable and not established (3). The forty published projects and what each page contains (4). The disclosure test, coded (5). The record nobody is directed to, which is the spine (6). TVA's project register behind the website, and the falsification test that bounds it (7).

Part III — Measuring the Burden. Corridor measurement, and the 2.63 ratio (8). Who pays, and why a Tennessee county that hosts a corridor receives nothing on account of it (9).

Part IV — Cases. Sumner County and Meta (10). Maury County and a line whose scope is described at length only in another agency's loan paperwork, and whose entire TVA environmental record is one row in a register (11). Cheatham and Robertson, where the environmental impact statement was never published and the transmission project outlived it (12). Lowndes County, Mississippi, where an economic development agency named the customer in the same article in which TVA did not, and where the site is marketed at sixteen megawatts while the same agency says TVA is scoping a hundred and eighty (13).

Part V — What Remains. What this volume could not resolve, and what would close each gap (14). The conclusion, stated at the size the evidence will bear (15). TVA's generation siting data is at Appendix E; the records-request handbook is published separately as *Getting the Record*.

PART I — THE MISSING FORUM

Chapter 1 — A Federal Corporation Sites Its Own Lines

Legal authorities verified 15 August 2026.

1.1 The claim, stated carefully

No state or federal body issues a certificate for a TVA transmission line. None holds a hearing on whether the line is needed. None reviews the route TVA selects. **No proceeding, state or federal, gives an affected landowner a right to intervene on whether the line is needed or on TVA's choice among routes.**

What a TVA transmission line does reliably trigger is environmental permits and consultations that regulate particular effects, and a federal condemnation case in which the contested question is ordinarily the price.

That formulation is narrower than "no proceeding exists," and deliberately so. A TVA line can require a Clean Water Act section 404 permit from the Army Corps of Engineers, a state water quality certification, consultation with the Fish and Wildlife Service under the Endangered Species Act, consultation with the State Historic Preservation Officer under the National Historic Preservation Act, and a special use permit if it crosses national forest. Those are real proceedings with external decision-makers, and a reader who is told they do not exist will stop reading.

None of them adjudicates whether the line is built or where it goes. A permit condition on a stream crossing can move an alignment at the margin, and that is worth conceding; it is not a decision on need or route.

None of this is a recent discovery, and the Comptroller General's staff drew the same comparison forty-four years ago. In March 1982 the General Accounting Office reported to Senator Jim Sasser on options for TVA oversight, and its finding on the Board is stated three times in twenty-eight pages — on the cover, in the transmittal letter, and again in an appendix:[11]

> "The Congress established and has maintained the Board as the single and final authority on many TVA power activities and programs including power planning, ratemaking, budget, energy resource development, and public involvement."

Two further passages matter more to this volume than that one. On what the statute requires:

> "The TVA Act does not require public involvement or information programs. Current TVA programs have been implemented since 1975 when Board meetings were opened to the public for the first time. TVA's current public involvement programs are voluntarily [*sic*] and at the discretion of the Board."

And on what investor-owned utilities do instead — where GAO reaches for siting as the paradigm case, which is the comparison this volume makes:

> "Privately owned utilities are subject to public involvement in most major areas of activity through State rate review and approval hearings **and State hearings on the siting of new power plants**. Members of the public and special interest groups are allowed to address and dispute utility load forecasts, cost of service studies, and other utility documents and positions at these hearings. Public testimony is considered before the final decision or order is issued." *(Emphasis added.)*

GAO also recorded what consumer groups told it: that public input "was felt to be a token effort because the Board had already 'made up its mind.'" GAO's own assessment, in its own voice and hedged, followed: "**This may be in part because** the Board rarely explains its decisions." The hedge is GAO's and is kept here.[12]

The report listed statutory amendments requiring records of decision and public-involvement guidance, and made no recommendation on them — "As agreed with your staff," in GAO's words. Neither was enacted.[13] So the condition this volume measures in 2026 was described by the federal government's own auditor in 1982, published, and left in place. What follows is a measurement of what that condition produces in the documentary record, which is a question GAO did not ask.

1.2 Why Tennessee has no certificate requirement

Tennessee's public utility statute excludes TVA by definition. Tenn. Code Ann. § 65-4-101(6)(A)(i) removes from the meaning of "public utility" any "corporation owned by or any agency or instrumentality of the United States."

TVA's distributors sit outside the Commission too, but on separate grounds and not on one. Subsection (ii) removes counties and municipalities, which covers the municipal electric systems. The rural cooperatives are excluded by their own organisational form under Tenn. Code Ann. § 65-25-123. Both classes are outside; the statutory basis differs, and this volume does not collapse them.

The state's one transmission-adjacent certificate provision, § 65-4-208, reaches a "person, firm or corporation" not already in the business in 1955 that imports out-of-state generation. It does not reach TVA.

So the Tennessee Public Utility Commission has no jurisdiction over the need for a TVA line, its route, or its cost.

Even a state statute that purported to reach TVA would fail. TVA is a federal instrumentality, 16 U.S.C. § 831c, and a State may not impose permitting requirements on a federal instrumentality without a clear and unambiguous congressional waiver. *Hancock v. Train*, 426 U.S. 167, 178–80 (1976); *Mayo v. United States*, 319 U.S. 441 (1943). The TVA Act

contains no such waiver for siting or land use. The same reasoning disposes of county and municipal zoning: no consent, no application.

Congress did waive immunity for water pollution requirements, in Clean Water Act section 313, 33 U.S.C. § 1323, which expressly includes permits. That is why TVA obtains Tennessee Aquatic Resource Alteration Permits from the state environment department for stream and wetland crossings. A state agency does issue a permit for a TVA transmission line. It regulates the crossing, not the corridor.

1.3 Why FERC does not set TVA's rates or plan its transmission

The Federal Power Act exempts TVA on its face. 16 U.S.C. § 824(f) provides that no provision of the subchapter applies to "the United States… or any agency, authority, or instrumentality" of it "unless such provision makes specific reference thereto." TVA is not a public utility under the Act, and sections 205 and 206 do not reach its rates.

FERC Order 1000, which requires regional transmission planning and cost allocation, binds public utility transmission providers. TVA is not one. The D.C. Circuit upheld FERC's decision not to compel non-public utilities into Order 1000 planning in *South Carolina Public Service Authority v. FERC*, 762 F.3d 41, 92–93 (2014). TVA participates voluntarily in the Southeastern Regional Transmission Planning process, which is a stakeholder forum rather than a proceeding. It produces no order binding on TVA and allocates no cost.

One correction to a common description. TVA does not operate under a FERC-approved reciprocity tariff or safe harbor. It provides transmission service under Transmission Service Guidelines first approved by its own Board in 1996, modeled on FERC's pro forma open access tariff "to the extent consistent with TVA's obligations under the TVA Act." Those Guidelines are posted on TVA's information system. As FERC recorded in *Athens Utilities Board v. TVA*, 177 FERC ¶ 61,021 (2021), they "have not been filed with the Commission as a reciprocity tariff." Bonneville, Western Area Power Administration and Southwestern have used the safe harbor. TVA never has. Its transmission tariff is a document it approved for itself.

Section 211A of the Federal Power Act, 16 U.S.C. § 824j-1(b), does reach TVA as an "unregulated transmitting utility." It provides that FERC "may" require comparable transmission service. Four of TVA's own distributors tested it in 2021 and lost on a three-to-one vote of the Commission. FERC's reasoning is worth quoting because it describes the shape of the whole system:[1]

> "our authority under section 211A is discretionary"

and

> "there are no established requirements under section 211A that an unregulated transmitting utility must meet, so there can be no 'violation' of section 211A by an unregulated transmitting utility."

Section 211A does state a comparability and non-discrimination standard. What FERC held was narrower and, for a complainant, worse: because the Commission had imposed no antecedent section 211A requirement on TVA, there was no existing requirement to be found in violation of. A petitioner may ask the Commission to exercise its discretion. It cannot prosecute a breach. FERC has invoked section 211A once in its history, against Bonneville. Two of the petitioners appealed and withdrew.

What FERC does reach is reliability. Section 824(b)(2) makes the NERC reliability standards applicable to section 824(f) entities, so TVA's system is externally regulated on how it performs. Not on where it goes.

1.4 The Board sets the rates, and no court will look at them

16 U.S.C. § 831a(g)(1)(L) directs the Board to "establish the electricity rates charged by the Corporation." The revenue requirement comes from § 831n-4(f), which instructs that rates produce enough for operations, tax equivalent payments, debt service and Treasury repayment, with due regard for "the objective that power shall be sold at rates as low as are feasible."

Nine directors, appointed by the President with the advice and consent of the Senate, at least seven resident in the service area. § 831a(a)(1). Five-year terms. Quorum is five, and "[a] vacancy on the Board shall not impair the power of the Board to act." § 831a(e).

That last clause earned its keep in 2025, when the Board went more than nine months without a quorum. Four directors were confirmed in December 2025 and seated in January 2026. As of the August 2026 quarterly meeting six seats are filled and three are vacant, with two of the six serving as holdovers past the expiry of their terms.[2]

A corporation that sets its own rates through a board that can lawfully act while a third of its seats are empty is unusual. What follows from it is more unusual. TVA's rates are not judicially reviewable.

The governing authority is *Holbrook v. Tennessee Valley Authority*, 48 F.4th 282 (4th Cir. 2022), cert. denied, 143 S. Ct. 2565 (2023).[3] The court set out a two-part inquiry, held that ratemaking is traditionally committed to agency discretion, held that the TVA Act sets no guideline limiting that discretion, and concluded: "So we affirm the district court's decision that TVA ratemaking is 'committed to agency discretion by law.'" 48 F.4th at 290. The Fourth Circuit found in § 831j a "mass of discretionary lingo" and concluded that the Act "fairly exudes deference," borrowing the phrase from *Webster v. Doe*, 486 U.S. 592, 600 (1988). The Solicitor General, opposing certiorari, observed that the petitioner "cannot identify even a single decision subjecting the setting of rates by federal government utilities — much less such determinations by TVA — to judicial review."[4]

The older Sixth Circuit case is often quoted for the proposition and should be quoted carefully. *McCarthy v. Middle Tennessee Electric Membership Corp.*, 466 F.3d 399, 405 (6th Cir. 2006), carries the sentence "A long line of precedent exists establishing that TVA rates are not judicially reviewable" — but the sentence is a quotation, and the quotation marks

are in the reporter. Its source is *Matthews v. Town of Greeneville*, No. 90-5772, 1991 WL 71414, at *2 (6th Cir. May 2, 1991), an unpublished decision, followed by a string cite to four district court opinions, the earliest from 1974.[5] *McCarthy*'s own holding is narrower: that contract terms barring patronage refunds fall within TVA's unreviewable ratemaking authority, and that state law imposing additional constraints is preempted.

The provenance matters. The doctrine insulating a federal corporation's rates from judicial scrutiny has been reaffirmed — by *McCarthy* in 2006 and by *Holbrook* in 2022 — but its lineage runs back through an unpublished circuit disposition and a small group of district court decisions, the earliest from 1974. It has been restated more often than it has been examined.

So the cost of a transmission line reaches ratepayers through a rate that no court will examine, set by a board that no external body reviews, under a tariff the same board wrote.

1.5 TVA reviews itself under NEPA, under procedures it wrote

TVA is its own lead federal agency for environmental review of its transmission projects. Its procedures sit at 18 C.F.R. Part 1318. No other body approves, conditions, or remands a TVA environmental assessment, finding of no significant impact, or categorical exclusion determination. The only external check is a court, if someone sues.

The framework moved recently and moved toward TVA. The Council on Environmental Quality rescinded its government-wide NEPA regulations by interim final rule in February 2025 and by final rule in January 2026, leaving agencies to operate under their own procedures. TVA revised and republished Part 1318 by interim final rule effective 21 January 2026, *Implementation of the National Environmental Policy Act*, 91 Fed. Reg. 2470 (Jan. 21, 2026), with the regulatory text beginning at 2475.[6]

Three changes in that rule matter more to this volume than anything in the review standards. The requirement to circulate a draft environmental assessment for comment is gone. The minimum comment periods are gone. And comment is now at TVA's discretion: it may request public involvement in an assessment "in its sole discretion," it is obliged to respond in the environmental document only to comments it determines are substantive, and it is not required to respond to comments or objections "of any kind that were not submitted in the time or manner specified."[7] Chapter 2 describes what TVA offers a landowner in place of a proceeding; this is the rule that leaves TVA to decide what comes back.

The most consequential provision is not a review standard at all. It is the list of actions for which no assessment and no impact statement are required. Chapter 3 sets out what TVA's own published record of that list shows.

1.6 The distributors did not agree to any of it

TVA sells wholesale power to 153 local power companies. They are municipal electric systems and rural cooperatives, and they are the entities their customers actually pay.

Since 2019 TVA has offered a Long-Term Partnership Agreement: a rolling contract that renews automatically each year, terminable only on twenty years' notice, in exchange for a wholesale bill credit. As of 30 September 2025, 148 of the 153 had signed.[8]

A distributor has no vote, veto, or consultation right over where TVA builds a transmission line, and none over a large new load connecting inside its own service territory. The four distributors that tried to obtain independent transmission service went to FERC under section 211A and lost.

A local power company can therefore find a new industrial load arriving on its system, a new TVA line crossing its territory, and a new cost in its wholesale bill, without having had a forum in which to be heard on any of the three.

1.7 The one hearing a landowner is guaranteed

16 U.S.C. § 831c(h) gives TVA the power of eminent domain in the name of the United States. Section 831c(i) extends it to land for transmission lines, and states the standard: where an owner "shall fail and refuse to sell to the Corporation at a price deemed fair and reasonable by the Board," TVA may condemn "all property that it deems necessary."

The Board decides what is fair. TVA decides what is necessary.

The proviso preserves the Declaration of Taking Act, 40 U.S.C. §§ 3114, 3115 and 3118. Title and the right of possession pass to the United States when the declaration is filed and the estimated compensation deposited, before any hearing occurs. Venue is the federal district court where the land lies, § 831x, which is given "full jurisdiction to divest the complete title… out of all persons or claimants and vest the same in the United States in fee simple." A 1968 amendment repealed TVA's old three-commissioner valuation procedure, so ordinary federal condemnation practice applies.

Whether the line is needed, and whether it should run here rather than there, are not questions the court will entertain. *United States ex rel. TVA v. Welch*, 327 U.S. 546, 551–52 (1946), holds that Congress decides what taking serves a public use and that the authorized agency may act to the full extent of its statutory authority. A condemnee retains a narrow argument that the taking exceeds TVA's statutory authority, and that is the outer boundary.

A Tennessee landowner is guaranteed exactly one hearing about a TVA transmission line. It occurs after title has passed, and it is about the amount of the cheque.

Chapter 12 records a filing in which TVA estimated the compensation for a temporary right of entry at ten dollars.

1.8 What Virginia does instead

Virginia is the comparison because the Virginia volume documented it, and because the contrast is a matter of statutory text rather than temperament.

A public utility may not construct transmission facilities in Virginia without a certificate of public convenience and necessity from the State Corporation Commission, "issued by the Commission only after opportunity for a hearing and after due notice to interested parties." Va. Code § 56-265.2(A)(1). For overhead lines of 138 kilovolts or more, the certificate issues only after compliance with § 56-46.1.

Section 56-46.1 requires at least thirty days' notice by publication in every affected locality, written notice to each local governing body, and notice by first-class mail to every owner of property within the proposed route, with a map posted on the Commission's website. It requires the Commission to find that the line is needed, to find that the route minimises adverse impact on dwellings, scenic assets, historic and cultural resources and the environment to the greatest extent reasonably practicable, and to verify the applicant's own load flow modeling, contingency analyses and reliability calculations.

Then the provision that has no Tennessee analogue:

> "If, prior to such approval, any interested party shall request a public hearing, the Commission shall… hold such hearing."

And the definition that makes it real. An interested party includes "the governing bodies of any counties or municipalities through which the line is proposed to be built and persons residing or owning property in each such county or municipality." § 56-46.1(D). On written request from an affected local governing body or twenty or more interested parties, the Commission must hold at least one hearing in the affected area.

A Virginia landowner can compel a hearing. A Tennessee landowner cannot request one.

Virginia's process is not a utopia and the volume should not present it as one. Commission approval preempts local zoning under § 56-46.1(F), the Commission grants most applications, and the Virginia volume documented four separate routes around the proceeding. The point is comparative. Virginia's process can be criticised because it produces a record. Tennessee's cannot, because it does not.

1.9 Every remaining forum, and what each one is not

The TVA Board. § 831a(g)(1)(K) provides that the Board shall conduct such public hearings "as it deems appropriate." Discretionary, non-adjudicatory, no record, no decision on the merits, no appeal. The listening session before each quarterly meeting takes public comment. It does not take evidence.

The Regional Energy Resource Council. A discretionary federal advisory committee, chartered in 2013 and renewed for a seventh term in October 2025. It advises on energy resource priorities. It cannot review, condition, approve, or remand anything.

The Office of Inspector General. Statutory, and genuinely independent for what it does, which is audit and investigate. Its own description of the division of labour is exact: "The TVA Board and TVA management – not the IG – are charged with running TVA." A complaint to the Inspector General about a transmission route is not a contest of the route.

Congress. Appropriations and authorising oversight, Senate confirmation of directors, and removal of a director by concurrent resolution under § 831c(f). Political remedies, not individual ones.

State consumer advocates. Tennessee's Consumer Advocate appears before the Tennessee Public Utility Commission. There is no TVA docket for it to appear in.

Litigation under the Administrative Procedure Act and NEPA. The realistic avenue, and for siting essentially the only one. Its limits are severe and compounding. If TVA applies categorical exclusion 16, the new-transmission exclusion set out at Chapter 3 §3.1, there is no environmental document to challenge and no comment record from which to build standing. TVA's own procedures state that they do not govern the rights and obligations of any party outside the federal government. NEPA is procedural, so the remedy for a defective review is a better document rather than a different route. Review is deferential. And the rate consequences are separately unreviewable under *McCarthy*.

The avenue is not hypothetical. Landowners litigated TVA's categorical exclusion practice for a decade in *Sherwood v. TVA*, reaching the Sixth Circuit twice.[9] But *Sherwood* concerned vegetation management inside existing right of way, not the construction of a new line, and no reported decision has yet reviewed a TVA categorical exclusion for a new transmission line.[10] The doctrine that would govern such a case is therefore borrowed rather than settled.

1.10 What follows

A federal corporation plans the line, decides it is needed, chooses the route, determines internally that no environmental assessment or impact statement is required, condemns the land at a price its own board deems fair, and recovers the cost in a rate no court will examine — through distributors who have no vote, and, for the 148 of 153 reported to have signed the long-term agreement, cannot leave on less than twenty years' notice.

A categorical exclusion *is* a form of NEPA review; what TVA determines is that no assessment and no impact statement are required, not that the statute does not apply.

Every one of those steps is lawful. Most of them were designed in 1933 for an entity that did not yet exist, to electrify a region that had no power at all.

The rest of this volume is about what that structure does when the load arriving on it is a data centre.

Endnotes

Legal authorities are cited inline in the text in standard form. These notes carry the non-legal factual assertions, the verification status of contested cites, and the evidence grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. FERC, *Athens Utilities Board v. TVA*, 177 FERC ¶ 61,021 (2021). Quoted passages at PP 30, 33. **[P]**
2. TVA Board composition and vacancy status as of the August 2026 quarterly meeting, from TVA's published board roster and meeting materials. **[S[1]]** — a single institutional source; no independent corroboration sought.
3. *Holbrook v. Tennessee Valley Authority*, 48 F.4th 282 (4th Cir. 2022). The 282/283 discrepancy in circulation is resolved in favour of 282: the Fourth Circuit's own later opinion in *Bacardi & Co. v. USPTO*, 104 F.4th 527 (4th Cir. 2024), cites "Holbrook v. Tenn. Valley Auth., 48 F.4th 282, 287 (4th Cir. 2022)," and the petition for certiorari states that the opinion "is reported at 48 F.4th 282." The Solicitor General's brief in opposition gives 283 and is the outlier. Slip opinion at https://www.ca4.uscourts.gov/opinions/211415.P.pdf. **[P]**
4. Brief for the Respondent in Opposition, *Holbrook v. TVA*, No. 22-629 (U.S. filed 2023). **[P]**
5. Text as it appears at 466 F.3d 405, verified against the page-tagged reporter text at the Caselaw Access Project, https://static.case.law/f3d/466/html/0399-01.html. The page break to 406 falls later, within the *Carborundum* parenthetical. **[P]**
6. *Implementation of the National Environmental Policy Act*, 91 Fed. Reg. 2470 (Jan. 21, 2026) (interim final rule; request for comments), FR Doc. 2026-01092, codified at 18 C.F.R. pts. 1318, 1319; effective on publication; document spans 2470–2486. Page 2475 is the point at which the regulatory text begins, and is the page given in the eCFR source note for Part 1318 ("85 FR 17458, Mar. 27, 2020, as amended at 91 FR 2475, Jan. 21, 2026"). It is not the document's first page. **[P]**
7. 18 C.F.R. §§ 1318.301(b), 1318.500(c), (e) (2026), current eCFR text, last amended 91 Fed. Reg. 2470 (Jan. 21, 2026). The two deletions were established by comparing the eCFR text as of 20 January 2026 against the current text: former § 1318.301(c) required circulation of a draft environmental assessment for certain actions, and former § 1318.303(d) a thirty-day review of a draft assessment and finding of no significant impact in listed circumstances. **[P]**
8. TVA, *Annual Report on Form 10-K for the fiscal year ended September 30, 2025* (filed Nov. 2025), long-term partnership agreement signature count: 148 of 153. **[P]**
9. *Sherwood v. TVA*, 842 F.3d 400 (6th Cir. 2016); *Sherwood v. TVA*, 46 F.4th 439 (6th Cir. 2022). **[P]**

10. Search of reported federal decisions, August 2026. Absence of findings rather than proof of absence; a reviewer with Westlaw or Lexis should confirm. **[P, negative] Open item, Appendix F §F.1.**

11. U.S. General Accounting Office, *Tennessee Valley Authority — Options for Oversight*, EMD-82-54, B-206775, 19 Mar. 1982, released 23 Mar. 1982, report to Sen. Jim Sasser, 28 pp. https://www.gao.gov/assets/emd-82-54.pdf, retrieved 18 Aug. 2026; PDF read end to end, terminating normally at p. 28, not truncated. The formula appears on the cover, in the transmittal letter over the Director's signature, and in Appendix III. **Quoted here from the transmittal letter**: the 1982 scan's OCR layer is poor and the cover text carries machine-introduced typos ("whan," "cntities," "sinyle," "esteblished") that are not in the printed report. A reader quoting the cover should obtain a clean scan. **[P]** 12. Ibid., Appendix III, "Public information and involvement," and Appendix IV. GAO's sentence reads "TVA's current public involvement programs are voluntarily and at the discretion of the Board," and the *[sic]* is this volume's, marking GAO's grammatical slip. The "rarely explains" clause is GAO's own analysis in Appendix IV, hedged with "This may be in part because." Bold emphasis in the block quotations at §1.1 is added and is marked as such. **[P]** 13. Ibid. GAO set out the amendments as options and stated that it made no recommendation, in the report's own phrase "As agreed with your staff." That neither was subsequently enacted rests on the absence of any amendment to 16 U.S.C. §§ 831 *et seq.* imposing a public-involvement or record-of-decision requirement, checked 18 Aug. 2026 — a negative stated as such. **[P for the report; P, negative for non-enactment]**

Chapter 2 — What Takes the Place of a Proceeding

Endnotes carry evidence grades: [P] primary, [S] corroborated, [S¹] single source, [I] inference.

2.1 The virtual open house

TVA's substitute for a siting proceeding is an open house, usually virtual, usually thirty days.

The form is consistent.[1] TVA mails an invitation to property owners near the alternative route segments. It posts a website at `tvavirtual.com/<projectname>` showing the segments on a map. What the invitation says, where it sends a recipient, and what becomes of that destination are set out at §2.1A. It accepts comments "online, in writing, or by telephone" for thirty days. Some projects add an in-person session at a school or community centre.

Then TVA announces a preferred route.

Nothing in the TVA Act requires any of this. The Board "may conduct such public hearings … as it deems appropriate."[2] The open house is a practice, not an obligation, and TVA can alter or discontinue it without notice to anyone.

2.1A Where the notice points

Before it selects a route, TVA mails property owners an invitation, and the invitation points at an open house.

Eight of the eighteen Tennessee pages record the mailing in TVA's own words, in a sentence that varies only in its numbers: *"Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 345 property owners representing about 446 parcels."*[3]

One recipient's copy has been quoted in print. A Cherokee County, North Carolina property owner received a letter dated 12 January 2023 for the Appalachia Area Improvement project, six days before the open house opened, and a local newspaper quoted it twice:

> "You are invited to access a virtual open house … concerning a proposed transmission line project in Polk County in Tennessee and Cherokee County in North Carolina"
>
> "In order to provide power for growing load and increase power reliability in the Appalachia area, the Tennessee Valley Authority is proposing to build a switching

> station in Murphy, North Carolina, and about 27 miles of primarily single-circuit power line"

The ellipsis is the newspaper's, and it sits where a web address could go. Nothing establishes that one was cut, and no part of this volume's argument assumes it.[4]

The second sentence is the purpose formula of Chapter 5's census, in the mail, naming no customer and no load type. One letter, on one project, is not a practice, and this volume makes no larger claim for exactly that reason. What it shows is that on the one occasion a letter has been seen, the page's language and the letter's language were the same.[5]

There are two letters, and the census sentence covers one of them. TVA's own environmental assessments record a second mailing after route selection. Bristol: *"Each property owner affected by the preferred transmission line routes was mailed a letter explaining the project."* North Dayton: *"TVA announced the preferred route to the public in Winter 2018. Letters were sent to affected property owners, elected officials, and information was provided to the public through TVA's website."*[6]

The open house sits on a domain of its own. Twenty-four of the forty-one index listings print an address of the form `tvavirtual.com/<project>`, every one of them as plain text that cannot be clicked. Nine more state that a virtual open house was held and publish no address at all, and seven describe no open house. One page, the most recently updated, prints a `tva.com/virtual/` address as a live link whose visible text and destination differ: the text reads `tva.com/virtual/shooting-creek` and the link resolves to `experience.arcgis.com`.[7]

And TVA dates the open house closed on the page itself. The addresses are published with an expiry: *"The virtual open house is available from January 14 through February 16, 2021, at tvavirtual.com/bristol." "The virtual open house is available from May 5 through June 6, 2022, at tvavirtual.com/cateslanding."* The window is usually thirty days. What happens to the address afterward is a separate question, and on free methods it is unresolved: none of the twenty-four published `tvavirtual.com` addresses returned any content on 24 August 2026, but the tool used cannot distinguish a withdrawn page from a live one that renders nothing to a text extractor, and the Internet Archive could not be reached on that date, so no capture was checked; Chapter 6 note 48 records five captures of one open house splash page located on 15 August 2026, which have never been read for what they tell a property owner.[8]

So the notice sends a property owner to a site with a closing date on it, and after that date what remains is the project page. §2.2 sets out what the open house leaves behind, which is nothing: no comment-response document, no summary, no count of what was submitted.

Before the open house shows a property owner anything, it asks who he is. The sign-in gate is a form requiring first name, last name, personal address and telephone number, with the address geocoded to a point. Its text is the same on the two open houses that could be read, in two states three years apart, changed only in the project name:

> “Please sign in before entering the open house. During the course of this project, TVA may find it necessary to contact you. This is for TVA use only. The fields with the red asterisks are mandatory.”[9]

Against all of this, TVA publishes almost nothing about the mailing itself. Of the forty-one listings on the index, one page gives a date on which letters were sent, and one page states the rule that a property owner who was not contacted is not affected. It is the same page. The parcels layer TVA publishes for a project carries the owner’s name and mailing address and no field recording that anything was mailed to them.[10]

The practice can also fail without anyone being told. TVA’s press release announcing the Belmont Stage 2 open house in Clay, Lowndes and Oktibbeha Counties, Mississippi hyperlinks the words “virtual open house” to `tvavirtual.com/newliberty`, which is a different project in Alabama.[11]

2.2 What it is not

It produces no record. Comments are received and are not published. Across all eighteen Tennessee project pages there is no comment-response document, no summary of what was submitted, no count of comments received, and no statement of how any comment affected the outcome.[12] The strongest formulation any page offers is that TVA “collected additional input.”[13]

Compare a Virginia certificate case, where filed comments become part of a docket a stranger can read a decade later.

It has no parties. Nobody intervenes, nobody has standing, and nobody acquires a right to be answered. A comment is correspondence.

It comes after the alternatives are drawn. By the time the open house opens, TVA has surveyed the study area, drawn the segments and produced the maps. Chapter 8 measures what that costs: TVA studies about two and a half miles of route for every mile it selects, and the studying is complete before the public is shown anything.[14]

It announces rather than proposes. The output is TVA’s identification of “the preferred location,” language every page uses.[15] There is no stage at which a preferred route is put to anyone for approval.

2.3 The thirty days against the years

The asymmetry in the schedule tables is worth stating plainly.

For 109 North: open house 23 May 2024, comments closed 24 June 2024. Preferred route announced November 2024. Surveys winter 2024–25. Easement purchases beginning August 2026. Construction and in-service still “to be determined.”[16]

The window in which a property owner may say anything is thirty days out of a project life measured in years. It closes before surveys begin, before easements are valued, and before the route is final — 109 North's route changed after the comment period ended, and changed again after that.[17]

2.4 What actually changed a route

The Gregory family farm sits on Dobbins Pike in Sumner County, at the eastern origin of the 109 North preferred route announced in November 2024. It is a 239-year-old property running children's educational programmes.[18]

The comment period had closed five months earlier.

What followed was not a process. Opposition organised, a petition gathered roughly 2,500 signatures, local and then national press covered it, and TVA paused the project in the week of 19 February 2026. On 19 March 2026, at an on-site meeting with a TVA senior vice president, the farm crossing was abandoned.[19]

The route as published in August 2026 is 3.85 miles, half a mile longer than the November 2024 version.[20]

The farm won. It won through publicity and a site visit, sixteen months after the only formal opportunity to be heard had closed. That is the mechanism available to a Tennessee landowner, and it is available in proportion to how sympathetic and well-organised the landowner is.

2.5 The one proceeding that exists

Where a landowner will not sell, TVA condemns. 16 U.S.C. § 831c(i) sets the standard: where an owner "shall fail and refuse to sell to the Corporation at a price deemed fair and reasonable by the Board," TVA may take "all property that it deems necessary."[21]

In August 2024 the United States, for TVA, filed in the Middle District of Tennessee for temporary access to two families' land in Cheatham County. The complaint states its purpose:[22]

> "The public use for which the temporary property right is taken is the conducting of surveys, core drilling, environmental studies, appraisals, title investigations, and related activities for the acquisition of an easement and right-of-way…"

The estimated compensation for the temporary right: **ten dollars.**[23]

An ex parte motion for immediate possession was granted on 26 August 2024. The landowners had twenty-one days to respond.[24]

Under the Declaration of Taking Act, title and possession pass to the United States when the declaration is filed and the estimate deposited, before any hearing.[25] Whether the line is

needed, and whether it should run here rather than there, are not questions the court entertains.[26]

2.6 What the condemnation did not wait for

One detail of the Cheatham filings belongs here.

TVA sought and obtained survey access to land for a transmission line whose accompanying environmental impact statement had not been published — and never would be. TVA's spokesman said so at the time, and did not regard it as a concession:[27]

> "this is related to the proposed transmission lines and has nothing to do with the required environmental impact statement needed to be completed before the project can be moved forward."

He was describing an administrative fact. Transmission and generation were separate projects, so the survey access could proceed while the environmental review did not. Whether that separation is ordinary practice or segmentation is contested, and Chapter 12 sets out both accounts along with the consequence: the environmental impact statement was never completed, and the transmission project outlived it.

The point for this chapter is narrower and not contested by anyone. The one proceeding a landowner is guaranteed does not wait for the review that might have told them why.

2.7 What a landowner actually has

Assembled from this chapter and Chapter 1, the complete list of things a Tennessee property owner in a proposed TVA right of way can do:

- Attend an open house and submit a comment during a thirty-day window, with no right to a response.
- Decline to sell, and be condemned, with a hearing on price only.
- Organise publicly and hope for coverage.
- Sue under NEPA and the Administrative Procedure Act — where a document exists to challenge, which for most Tennessee projects it does not. Nine of the eighteen have only a categorical exclusion determination, which reaches the public as a row in a register rather than as a document. Two have a full environmental assessment and a finding of no significant impact, and they are the two on which such a suit would have something to read.[28]
- Write to the Board, the Inspector General, or a member of Congress.

There is no forum in which the question *should this line be built here* is decided by anyone other than TVA.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S^1] single source, [I] author inference.

1. Composite of the Public Involvement and Project Schedule sections across all eighteen Tennessee project pages, coded August 2026; Appendix A. **[P]**

2. 16 U.S.C. § 831a(g)(1)(K) (2024). **[P]**

3. Coded census, Appendix A §A.4, which reproduces all eight sentences verbatim. The wording is not uniform: Hardin Valley and Lexington read "routes" and "the virtual open house" where the others read "segments" and "a virtual open house," and Dickson uses an unspaced em dash. Across the wider index the same sentence appears on fifteen of forty-one listings, totalling about 2,398 owners and 3,496 parcels; adding the unlisted Harding Spring–Gladstone gives about 2,518 and 3,650. **[P]**

4. *Cherokee Scout* (Murphy, N.C.), "Residents facing off with the TVA," February 2023, quoting a letter received by a Cherokee County property owner. **[S^1]** — a single outlet quoting a document this volume has not seen. The letter itself has not been located or captured and is not in the deposit. The ellipsis in the first quotation is the newspaper's. Whether the letter prints a web address, and to which domain, is **not established**, and no claim here depends on it. **Open item, Appendix F §F.1.**

5. Comparison of the quoted sentence against Appendix A §A.3's verbatim purpose statement for the same project. The two are the same formula. **[P for the comparison; S^1 for the letter text, per note 4]**

6. TVA, *Bristol, Tennessee Area Power Improvement Project, Final Environmental Assessment*, Project No. 2023-1, §1.5; TVA, *North Dayton Power System Improvements, Final Environmental Assessment*, 30 Oct. 2020, §1.5, p. 4. Both retrieved 23 Aug. 2026 from the Azure CDN origin; retrieval route and truncation cautions at Chapter 3 note 5. **Bounded:** both PDFs were truncated by the fetch tool before their correspondence appendices, so whether either appends a letter template is not established either way. **[P] Open item, Appendix F §F.1.**

7. Census of the Public Involvement sections of all forty-one listings on TVA's transmission project index, 23 Aug. 2026. The forty-one divide: twenty-four print a `tvavirtual.com` address as plain unlinked text; one prints a `tva.com/virtual` address as a live link, Shooting Creek, North Carolina, whose anchor text and `href` differ as described; nine assert that a virtual open house was held and publish no address; seven describe no virtual open house at all. **24 + 1 + 9 + 7 = 41.** Note that the index carries forty-one *listings* of forty unique projects, Appalachia Area Improvement appearing twice; Chapter 4 §4.1 sets out the distinction and these denominators are listings. **[P]**

8. Closing dates quoted verbatim from the Bristol and Cates Landing project pages, coded census, Appendix A. Twenty-four pages publish a `tvavirtual.com` address with a stated availability window; the windows run thirty days or a little more. **[P]**

On what happens to the address afterward, and why this volume claims nothing about it. Two tests were run and neither settles it. All twenty-four published `tvavirtual.com` addresses, in both scheme and host forms, returned an empty body on 24 Aug. 2026 — but so did a deliberately invalid control domain, byte for byte. The retrieval tool reports no status code and no error, so a withdrawn page, an empty body, a per-host failure and a client-rendered application that returns nothing to a text extractor are indistinguishable through it. That is what makes the negative uninformative. A second test, of guessed `tva.com/virtual/<slug>` forms, resolved only the two slugs whose spelling was independently known and all forty-four misses were guesses; that design cannot separate removal from misspelling, and no claim rests on it. The Internet Archive could not be reached on 24 Aug. 2026 — `web.archive.org` is blocklisted to the fetcher and `archive.org/wayback/available` returned an empty body on some sixty consecutive queries — so no capture was checked; Chapter 6 note 48 records five captures of one open house splash page located on 15 Aug. 2026, which have never been read for what they tell a property owner. **Stated as a limit and not a finding: what became of the retired addresses is not established, and nothing here should be read as claiming they were withdrawn. Open item, Appendix F §F.1.**

9. TVA, Survey123 form `Open House Splash Window - Roane County, TN`, item `8bdf65ce94674747b9b7fc2b54c65f0c`, retrieved 23 Aug. 2026 from the public ArcGIS Online sharing endpoint; the identical text, changed only in the project name, appears in `Open House Splash Window - Shooting Creek` for a North Carolina project three years earlier. Required fields: first name, last name, personal address, phone number; the form geocodes the typed address. **[P]**

10. Public Involvement census as at note 7 for the two counts. The parcels layer is `Appalachia_Area_Improvement_Affected_Parcels`, TVA-GIS organisation `w8auYAijfGK1Mydj`, 446 records, public and unauthenticated, retrieved 23 Aug. 2026; its schema carries `OWNNAME`, `MAILADD`, `MCITY`, `MSTATE` and `MZIP` and no field recording notification. No values from that layer are reproduced anywhere in this volume, and none should be: the finding is the schema, the record count and the access level. **[P]**

11. TVA, "TVA Invites Public to Open House for Proposed Transmission Project in Clay, Lowndes, and Oktibbeha Counties," 28 Oct. 2024, retrieved 24 Aug. 2026; the anchor text "virtual open house" carries `href` `https://www.tvavirtual.com/newliberty`. New Liberty, Alabama is also the source of the misplaced Piedmont, Alabama public-involvement paragraph recorded at Appendix A §A.6.1. **[P]**

12. Full-text review of all eighteen pages for any comment summary, response document or comment count. None located. **[P, negative]**

13. TVA, *109 North, Tennessee (Sumner County)*, August 2026 update, capture 16 Aug 2026, deposit 10.5281/zenodo.21959989. **[P]**

14. See Chapter 8. Computed from the archived register, same deposit. **[P]**

15. Common phrasing across the census; e.g. “TVA has identified the preferred location for transmission improvements…” **[P]**

16. 109 North capture, schedule table. **[P]**

17. Route length 3.34 miles (Nov 2024) to 3.85 miles (Aug 2026); the intervening change is the Gregory farm reroute. **[P]**

18. Main Street Media / *Gallatin News* coverage, March 2026. **[S]**

19. Ibid.; pause reported week of 19 Feb 2026, on-site meeting 19 Mar 2026 with SVP David Bowling. **[S^{1}]** — single outlet.

20. 109 North capture. **[P]**

21. 16 U.S.C. § 831c(i) (2024). **[P]**

22. *Cheatham County Exchange* (Main Street Media of Tennessee), Sharon Alice Lurie, 10 Sep 2024, reporting the filing of 20 Aug 2024, M.D. Tenn. **[S^{1}]** — as at Chapter 12 note 3, which grades the same figure. The volume cannot say which filed document the quoted words come from. One outlet, one unretrieved docket, and an unsettled question about which paper is being quoted. **Open item, Appendix F §F.1.**

23. Ibid. **[S^{1}]** — as at note 22.

24. Ibid.; ex parte motion 26 Aug 2024, granted by Judge Aleta Trauger. **[S^{1}]** — as at note 22; the same single outlet, and the docket has not been pulled. **Open item, Appendix F §F.1.**

25. 40 U.S.C. §§ 3114, 3115 (2024). **[P]**

26. *United States ex rel. TVA v. Welch*, 327 U.S. 546, 551–52 (1946). **[P]**

27. Scott Brooks, TVA Media Relations, quoted in the *Cheatham County Exchange*, 10 Sep 2024. **[S^{1}]** — one outlet. The competing account, from Tracy O’Neill of Preserve Cheatham County, and the non-publication of the environmental impact statement are set out with their sources at Chapter 12 §§12.5 and 12.3.

28. See Chapter 3 §§3.1–3.4 on categorical exclusion 16. TVA publishes the determinations: *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, eight documents covering 27 Apr. 2020 – 31 Mar. 2026, 11,899 records, retrieved 17 Aug. 2026. Nine of the eighteen Tennessee projects have a located line-level determination and every one is exclusion 16, producing eleven register entries; a tenth, Columbia (Fiberon), has no determination in its own name and is graded probable and not established; Bristol proceeded instead by final environmental assessment and finding of no significant impact of 19 Apr. 2024, and North Dayton by both of 30 Oct. 2020. Full account and per-project

table at `TVA_CE_Determination_Research_v0_1.md`; retrieval and truncation cautions at Chapter 3 note 5. **[P] Open item, Appendix F §F.1.**

PART II — THE RECORD TVA PUBLISHES

Chapter 3 — TVA Publishes the Register, Not the Checklists

Computed from TVA's eight published lists of completed categorical exclusion checklists, 27 April 2020 to 31 March 2026, 11,899 entries.

3.1 The list of projects that need no review

TVA publishes an exclusion register of the environmental determinations it makes about its own projects. Eight documents, 27 April 2020 to 31 March 2026, 11,899 rows, each naming a project and the exclusion applied. It is the fullest account TVA gives of how its transmission lines clear environmental review, and it records that a determination was made without recording anything TVA weighed in making it.

This chapter reads that register against the eighteen Tennessee projects. The regulation it applies comes first.

TVA's categorical exclusions, whose procedural setting is at Chapter 1 §1.5, are a numbered list at Appendix A to Subpart C of Part 1318. Number 16 covers "[c]onstruction of new transmission line infrastructure, including electric transmission lines generally no more than 10 miles in length and that require no more than 125 acres of new developed rights-of-way and no more than 1 mile of new access road construction outside the right-of-way," together with substations and interconnection facilities disturbing "generally" no more than ten acres. Number 19 covers rebuilds within or contiguous to existing right of way, "generally no more than 25 miles in length."[1]

Two features of that text deserve stating plainly, and the second needs reading closely.

There is no voltage threshold. A 500-kilovolt line and a 161-kilovolt line are treated alike; only length, acreage and access road distinguish them.

But the acreage limit does the work a voltage threshold would do. A wider corridor consumes the 125 acres faster. At the 100-foot right of way that appears on nearly every Tennessee page in this volume, 125 acres is reached at **10.3 miles** — the acreage cap and the mileage figure are the same constraint, which is presumably why they were written together. At the 187.5-foot width TVA uses for its widest corridors, including the Tiptonville river crossing and the North Dayton lake crossing, it is reached at **5.5 miles**. A 500-kilovolt corridor is wider still.

So the exclusion is calibrated to an ordinary 161-kilovolt line and binds sooner as voltage and corridor width rise. It could not carry a long 500-kilovolt build. The acreage cap does what a voltage threshold would do, and it is computable from the right-of-way widths in the field detail at Appendix A §A.5.

What the acreage cap does not do is make the determination checkable. Whether a given project was measured against 125 acres, and what figure TVA credited, is not published for any of the Tennessee entries §3.2 sets out — §3.3 returns to it.

Two of the four quantitative measures are qualified by "generally" and two are not. The word attaches to the ten miles of line length and to the ten acres of substation disturbance. The 125 acres of new developed right of way and the one mile of new access road sit in a separate clause — "that require no more than" — and carry no such softening. The qualified limit is the one the volume's projects are measured against.

A project inside those thresholds does not automatically escape review. The regulation requires that every action be screened for extraordinary circumstances, and provides that where an extraordinary circumstance "cannot be addressed sufficiently to render the action's impacts not significant, an EA or an EIS must be prepared."

So the accurate statement is conditional. Where TVA determines that exclusion 16 applies and that no unresolved extraordinary circumstance is present, it prepares no environmental assessment and no environmental impact statement, and there is no scoping and no public comment period. The screen is internal and conducted by TVA, and §3.3 shows that its result is not published.

This argument is not new and the volume does not present it as new. In September 2017, eighteen organisations led by the Southern Environmental Law Center filed roughly ninety pages of comments on TVA's proposed NEPA rule, with sections addressed specifically to categorical exclusions 16, 17, 19 and 20. They made the segmentation point exactly: because the ten-mile figure is qualified by "generally," TVA "could simply break up a 150-mile, 1,000-mile, 10,000-mile stretch of new transmission infrastructure into 10-mile increments and categorically exclude all of its activities."[2]

What this volume adds is that the comments did not change the text, and that nobody renewed the objection when the opportunity came back. The transmission categorical exclusions are character-for-character identical to their 2017 form; the January 2026 republication did not touch them.[3] When FERC adopted TVA's exclusions 16 and 17 for its own use in February 2026, the docket drew no comment, no protest and no filing from any party.[4]

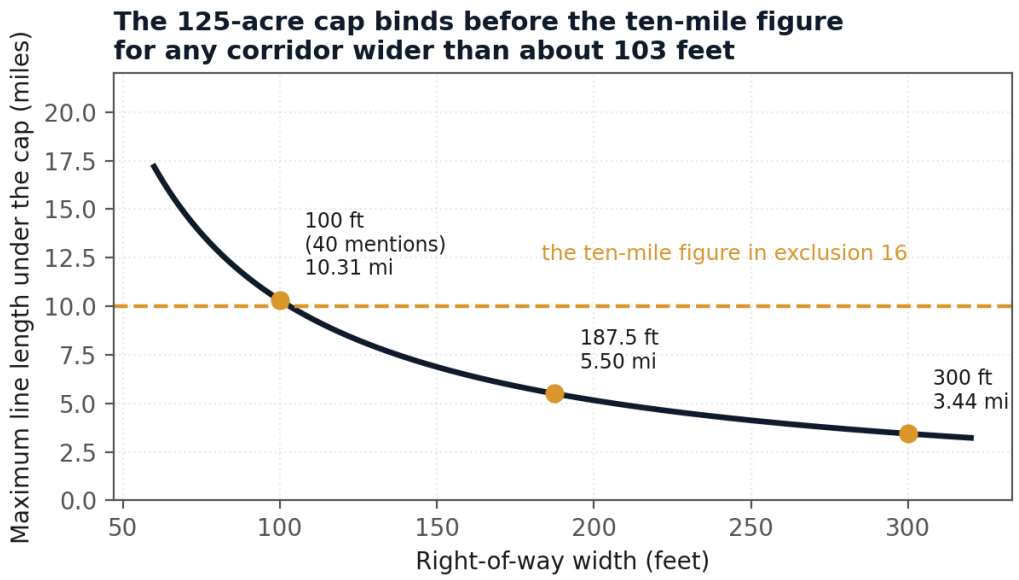


Figure 2. *Categorical exclusion 16 carries no express voltage threshold, but its 125-acre right-of-way cap binds before the ten-mile figure for any corridor wider than about 103 feet.*

3.2 What TVA actually determined, project by project

Mileage under ten, with no environmental assessment on record, does not establish that TVA applied exclusion 16. A project could have proceeded under a different exclusion, under an extraordinary-circumstances screen, or under a record not located.

It no longer has to be inferred. **TVA publishes registers of completed categorical exclusion checklists, naming each project and the exclusion applied.** Eight documents cover 27 April 2020 to 31 March 2026 and carry **11,899 entries**, each with the columns *CEC ID, Project Title, County, State, Business Unit, Date Closed, CE Applied*.[5]

Two limits on that source before it is used. The series begins on 27 April 2020, so any determination closed earlier is outside the published record entirely. And a register entry is evidence that TVA recorded an exclusion, not the document in which TVA reasoned to it; §3.3 returns to the distinction.

Against the eighteen Tennessee project pages, the record divides **four** ways, and the fourth category is the one this volume most needs to admit.

Nine have a located line-level determination, and every one of them is exclusion 16.[6] Those nine produce eleven register entries, because North Gallatin and Tullahoma each carry two.

Project	CEC ID	Closed	CE
North Gallatin	42028	17 Dec 2020	16
North Gallatin (second determination)	47568	11 May 2023	16
Tiptonville	48399	12 Apr 2023	16
Tiny Town Road	48005	5 Jun 2023	16
Hardin Valley	47201	24 May 2023	16
Tullahoma (Center Grove)	50079	23 Jan 2024	16
Tullahoma (Center Grove), republished	50079	12 Sep 2024	16
Cates Landing	49618	7 Feb 2024	16
Lewis Chapel	49356	23 May 2024	16
Riceville	51691	6 Dec 2024	16
Fall Creek	54096	7 Jan 2026	16
Ultium – Night Sky *(no project page)*	47184	11 Aug 2022	16

The unit matters, and the counts differ depending on which unit is used. Eighteen Tennessee projects have public pages. Nine of those eighteen have a located line-level determination. Those nine produce **eleven** register entries, because North Gallatin and Tullahoma each carry two — North Gallatin's twenty-nine months apart for what its page presents as one project. A twelfth entry, Ultium – Night Sky, belongs to a project with no page at all and is listed here because Chapter 11 turns on it.

Tullahoma is a separate puzzle and the register does not solve it. Two entries carry the identical checklist identifier, 50079, with closing dates eight months apart and near-identical titles differing by three words. Either the determination was reopened and closed twice, or the same record was published twice. The register shows no field that would distinguish those, and the volume does not guess.[6]

Not one used exclusion 17, and not one used exclusion 19.

One project sits in a fourth category, and it is the page this volume turns on. Columbia (Fiberon) has no determination in its own name anywhere in the 11,899 entries. The word "Fiberon" appears nowhere in the series. One entry is a strong match on route and date — CEC 54402, "Columbia-Mt. Pleasant 46-kV Transmission Line (L2522) Reroute for Columbia Industrial Development Board," closed 5 January 2026 — but TVA's title names the development board, not the customer, and this volume grades the identification **probable and not established**.[14]

The arithmetic matters because a reader will do it. Nine, plus two assessed, plus six with nothing located, plus Fiberon, is eighteen. A three-way division comes to seventeen and drops the one project on which the volume's central comparison depends.

Two lines were assessed rather than excluded. Bristol received a final environmental assessment and a finding of no significant impact on 19 April 2024, for roughly 14.2 miles. North Dayton received both on 30 October 2020, for twelve miles.[7] Both are over the ten-mile figure, and both got the document. Neither was authorised by a line-level exclusion — though both generated separate exclusions for ancillary components, Bristol under 13 for geotechnical work and 25 for a laydown yard. That is the best evidence available that TVA observes its own ceiling rather than writing around it.

Six have no located determination of any kind — no exclusion, no assessment, no impact statement. They are Appalachia Area Improvement at 25.2 miles, West Tennessee at 21 to 24, Lexington–Jacks Creek at 15.83, Dickson at about 14, Waldens Creek, and 109 North.[8] Three of the six are the three longest projects on the list, and a fourth, Dickson, is the fifth longest. Their pages say the review "will be conducted" or is "pending," in the future tense, while carrying construction schedules — and in Waldens Creek's case, three months after the preferred route was chosen.

109 North is the sharpest of the six. It has one determination in the whole series, CEC 54972, and it is for soil borings.[9]

3.3 What the register shows, and what it does not

Three things are absent from all 11,899 records, and each one bounds what the public can check.

There is no extraordinary-circumstances field. The regulation requires that every action be screened for extraordinary circumstances, and the published list records only that a checklist was completed. Whether a screen found nothing, or found something and resolved it, is invisible for every project.[10]

There is no approving official. Each document names a single NEPA specialist as a general contact. No determination is attributable to a person.

TVA publishes the register, not the checklists. For all nine Tennessee projects above, the public record establishes *that* an exclusion was applied and *when*. It establishes nothing about the mileage counted, the acreage credited, or the reasoning. A reader cannot check the work, and this volume cannot either — the eleven CEC identifiers are on the records-request list in the companion guide for exactly that reason.

One structural feature is worth stating carefully. One publicly named project routinely produces three to five separate determinations. Bristol has a geotechnical exclusion under 13, a laydown yard under 25, and the assessment. Cates Landing, Fall Creek, Lewis Chapel and Riceville each have a borings exclusion closing months before the line's. North Gallatin has two exclusion-16 determinations twenty-nine months apart for what the public page presents as one project. Nothing here establishes intent, and boring before designing is the ordinary engineering sequence. What can be said is narrower and still worth saying: the unit TVA assesses is not the unit the public is shown, and **the published register does not record whether TVA considered any of these determinations against the others**.

Whether a cumulative assessment happened internally is unknown, which is itself the transparency finding.[11]

3.4 The exclusion that is not used

Exclusion 19's rebuild limb permits work up to twenty-five miles within or contiguous to existing right of way. It reads as the larger authority and as a live alternative pathway.

It is not one. Across 11,899 determinations in six years, **exclusion 16 was invoked 106 times and exclusion 19 eleven times.**[12] Of the eleven, eight are line demolition, removal or retirement. One is an explicit reconductor and rebuild. Two cannot be classified from the published title.

Exclusion 16 use is also rising: four in the five-month 2020 stub, twenty in 2021, twelve in 2022, eighteen in 2023, nineteen in 2024, and twenty-six in 2025, the highest in the series.

What TVA does instead of splitting work between the two exclusions is visible at Tiptonville. That determination carried a new 6.8-mile line, the reconductoring of the existing line beside it, and the widening of the right of way from 100 feet to 187.5 — all on one exclusion 16.[13] The reconductoring was not split out to 17, and the widening was not split out to 19.

So the register establishes, for nine of the eighteen, that a determination was made and when. It establishes nothing about what was measured or what was weighed, and for six of the eighteen it records nothing at all. What TVA tells the people whose land these lines cross is a separate record, published on a separate system, and Chapter 4 counts what is on it.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S^1] single source, [I] author inference.

1. 18 C.F.R. pt. 1318, subpt. C, app. A, items 16 and 19, quoted verbatim from the eCFR text current at 27 July 2026. The exclusions are a numbered list in the appendix rather than separately numbered sections. In item 16 the qualifier attaches to the ten miles of line length and, in the second limb, to the ten acres of substation disturbance. The 125 acres of new developed right of way and the one mile of new access road sit in an intervening relative clause — "and that require no more than" — and carry no qualifier. **[P]**
2. Southern Environmental Law Center et al., *Comments on TVA NEPA Proposed Rule*, 6 Sept. 2017, at 69 (CE 16), 73 (CE 17), 78 (CE 19), 82 (CE 20), https://www.selc.org/uploads/words_docs/NEPA_filing.pdf. Eighteen signatory organisations. **[P]**

3. Comparison of the appendix text at 20 January 2026 against 27 July 2026: items 1–50 identical. What moved was former Subpart G, on floodplains and wetlands, now a separate 18 C.F.R. Part 1319. **[P]**
4. FERC Docket No. CX26-1-000, 194 FERC ¶ 61,128 (Feb. 19, 2026), adopting TVA categorical exclusions 16, 17, 36, 37 and 38. Docket examined August 2026: no comment, protest or intervention by any party. **[P, negative]**
5. TVA, *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, and the eight documents linked from it, retrieved 17 Aug. 2026. Entries by period: FY2020 from 27 Apr. 813; FY2021 2,471; FY2022 2,154; FY2023 1,934; FY2024 1,872; FY2025 1,762; FY2026 Q1 399; FY2026 Q2 494. Total 11,899. **Two retrieval notes a reproducer needs.** `www.tva.com` returns HTTP 403 behind a Cloudflare challenge to plain fetchers; the same PDFs are served unchallenged from the Azure CDN origin `https://tva-azr-eastus-cdn-ep-tvawcm-prd.azureedge.net/cdn-tvawcma/docs/default-source/environment/environmental-stewardship/nepa-environmental-reviews/completed-categorical-exclusion-checklists/`, except the FY2021 list, which has no copy at that CDN path and is served from tva.com at `/docs/default-source/1-float/`, a different path from the other seven. And automated fetchers may truncate long PDFs silently — the FY2025 list was returned cut off mid-word at page 41 of 115 by one tool, with no error raised. Counts here were derived from complete documents parsed in a browser, and independently re-derived by a second researcher whose per-year tallies reproduced cell for cell. Full account at `TVA_CE_Determination_Research_v0_1.md`, which is a working file and is not deposited. All eight lists were captured on 24 August 2026 and are hashed at Appendix D §D.9, which states what those captures verify and what they leave to the derivation described here: no list states a total, six of eight captures truncate, and 4,747 of the 11,899 rows are captured. **[P] Open item, Appendix F §F.1.**
6. Ibid. Each row quoted verbatim from TVA's table in the research file, with the checklist identifier, project title, county, business unit, closing date and applied exclusion. **Two bounds on this source.** The series begins 27 April 2020, so any determination closed earlier is outside the published record entirely. And a register entry records that TVA applied an exclusion; it is not the checklist in which TVA reasoned to it. **[P]**
7. TVA, *Bristol, Tennessee Area Power Improvement Project, Final Environmental Assessment*, Project No. 2023-1, and its finding of no significant impact. The signature below is cited to the finding of no significant impact and not to the environmental assessment. The assessment was captured on 24 August 2026; in the portion retrieved it carries no signature block and no occurrence of the name Booker, and its cover reads only "April 2024." That capture is truncated before the document's appendices, so whether the finding sits beyond the cut or is published separately is not established. The finding itself has not been captured. Signed 19 Apr. 2024 by S. Dawn Booker, Senior Manager, NEPA Compliance: "TVA proposes to build the Sullivan-South Bristol 161-kV Transmission Line and the Bluff City-South Bristol 161-kV Transmission Line totaling approximately 14.2 miles." TVA, *North Dayton Power System Improvements, Final Environmental Assessment*, Project No. 2019-3, and finding of no significant

impact, both dated 30 Oct. 2020, for "a 12-mile 161-kV Transmission Line (TL) Loop." The 28 October date carried by the PDF filename is an artefact and appears nowhere in the document. Bristol's ancillary determinations: CEC 50993, geotechnical studies, CE 13, closed 31 Aug. 2023; CEC 54148, construction laydown yard, CE 25, closed 17 Mar. 2025. **[P] Open item, Appendix F §F.1.**

8. Absence established by searching all 11,899 entries for each project name and each substation, delivery point and county variant, and by checking TVA's environmental reviews index for an assessment or impact statement under each name. Ancillary determinations exist for some of the six and are not determinations for the line: Lexington has a laydown-yard exclusion (53635, CE 17) and a metering replacement (55969, CE 18); Dickson's county contains an unrelated 2022 exclusion (46850) that should not be attributed to the project. **[P, negative]**
9. CEC 54972, "Highway 109 North Delivery Point Soil Borings," Sumner TN, closed 11 Sept. 2025, CE 13. **[P]**
10. 18 C.F.R. pt. 1318, subpt. C, app. A, preamble: "Individual actions must be reviewed to determine whether extraordinary circumstances are present (see § 1318.201). If an extraordinary circumstance cannot be addressed sufficiently to render the action's impacts not significant, an EA or an EIS must be prepared." The published lists carry seven columns and no eighth. A sweep of all rows and all front matter across the eight documents for *extraordinar*, *approving*, *official*, *signat* and *concurr* returns no column and no field; the only hits are incidental project titles. Independently confirmed. **[P, negative]**
11. Ancillary determinations as at notes 7 and 8 and in the research file. **[P for the determinations; I for the observation about the unit of assessment]** — that the assessed unit differs from the publicly presented unit is the author's reading. Nothing here establishes intent, and geotechnical work preceding design is ordinary sequence. The register carries no field recording whether related determinations were considered together, so whether any cumulative assessment occurred internally is unknown.
12. Counts across all 11,899 entries: CE 16, 106; CE 17, 427; CE 18, 198; CE 19, 11; CE 13, 268. The eleven CE 19 determinations characterised from their titles: eight demolition, removal or retirement; one explicit rebuild, CEC 39551 "Knox-Douglas 161kV Transmission Line Reconductor/Rebuild," Sevier and Knox TN, closed 20 Oct. 2020; two unclassifiable, CEC 41762 (an optical-ground-wire addition) and 44826 (a bare line name). CE 16 by year: 4 (FY2020 stub), 20, 12, 18, 19, 26, 0, 7. **[P]**
13. CEC 48399, "Tiptonville-New Madrid 161-kV TL - Reconductor & Build Second Line," Lake TN, closed 12 Apr. 2023, CE 16. Scope from TVA's project page, capture 17 Aug. 2026, `TVA_page_capture_tiptonville_new_madrid_no2_20260817.txt`, deposit 10.5281/zenodo.21959989. **[P for the determination and the page; I for the observation that the work was not split]**
14. Search of all 11,899 register entries retrieved 17 Aug. 2026 for "Fiberon" and for each Columbia-area substation, delivery point and line name: no determination in the project's own name, and no occurrence of the customer's name anywhere in the series. CEC 54402, "Columbia-Mt. Pleasant 46-kV Transmission Line (L2522) Reroute for Columbia Industrial Development Board," Maury TN, closed 5 Jan. 2026, is a strong

match on route and date. **Probable and not established.** What is missing is a document connecting that checklist to the Fiberon project: the checklist itself was not retrieved, and TVA's title names the development board rather than the customer. Register retrieval route and truncation cautions at note 5. **[P, negative for a determination in the project's own name; the identification of CEC 54402 is unlocated and is not claimed] Open item, Appendix F §F.1.**

Chapter 4 — The Census

Page contents verified 15–16 August 2026 and archived. Endnotes carry evidence grades: [P] primary, [S] corroborated secondary, [S¹] single source, [I] author inference.

4.1 Forty projects

On 16 August 2026, TVA's published list of current transmission projects carried forty-one listings of **forty unique projects across five states**.[1] Alabama nine, Kentucky three, Mississippi nine, North Carolina two, Tennessee eighteen. Appalachia Area Improvement appears twice, under both North Carolina and Tennessee, which makes forty-one listings. The headings for Georgia and Virginia are present and empty.

That number is not stable and should never be cited without a date. A handoff prepared five days earlier recorded forty-two projects across six states.[2] Either a project came off the list, or the earlier count treated the duplicate differently. The list is a web page TVA maintains, not a docket, and it changes without a changelog.

This chapter describes what a project page contains. Chapter 5 examines the one field that matters most, which is the stated reason for building.

4.2 The template

Every project page follows the same structure.[3] A title naming the place, sometimes with a parenthetical. A dated update block, or several stacked in reverse chronological order. A Background section carrying the original text, demoted as updates accumulate. Public Involvement. Map. Project Schedule. Environmental Reviews. Contact.

The Environmental Reviews section carries the same two template paragraphs on all eighteen Tennessee pages, word for word, including the sentence about coordinating wetland findings with the Army Corps of Engineers.[4] The template's own first sentence says the appropriate review "will be conducted." Where a page reports that a review is "pending," it does so in a dated update block higher on the page, not in this section. The section describes what will be done in the abstract and identifies no document.

For eleven of the eighteen Tennessee projects there was a document, or at least a decision, to identify. Nine have a completed categorical exclusion determination — project title, county, closing date and exclusion number — in a register TVA publishes and does not link from any project page. Bristol and North Dayton have a full final environmental assessment and a finding of no significant impact, dated 19 April 2024 and 30 October 2020.[5]

The Environmental Reviews section does not identify a document on any of the eighteen pages, including the two pages where a document exists. That is established on the captures.[6]

Bristol is the clean case. TVA issued a final environmental assessment and a finding of no significant impact in April 2024, and the Bristol page's Environmental Reviews section carries the same generic two paragraphs as every other page — no link, no docket number, no statement of what level of review was performed, and, unlike some pages, not even a dated update saying the review is "pending." It says nothing whatever about the status of the review.

North Dayton is the instructive case, because it is the one page of the eighteen that links its assessment at all — and the link is not in the Environmental Reviews section. It sits in a dated update block at the top of the page, stamped November 2020, pointing to a NEPA detail page elsewhere on tva.com. Beneath it, the Environmental Reviews section runs unchanged and does not mention that an assessment and a finding exist for the project it appears on. A reader who scrolled to the heading that promises environmental review would learn nothing about the completed review; a reader who noticed a six-year-old update block would.

So the boilerplate is not a placeholder awaiting review. **It is invariant to whether review happened.** North Dayton's review was completed and issued in October 2020, the finding was published, the page was updated to say so in a different section — and the section headed Environmental Reviews stayed exactly as it was.

One further obstacle is worth recording, because it defeats the obvious workaround. North Dayton's assessment is titled *North Dayton Power System Improvements*; the project page is titled *North Dayton, Tennessee*. Neither title contains the other, so a property owner who took the page title to TVA's environmental-review index and searched it would not match the document that exists for their own project.

The remaining qualification is real and narrow. A categorical exclusion determination is not a document TVA could have linked even had it wanted to, because TVA publishes the register and not the checklist. That bounds the nine, not the two. For Bristol and North Dayton the document existed, was published by TVA, and was not named where a reader would look for it.

What a page reliably tells a property owner:

- the county or counties
- the voltage class
- the endpoints, usually by road or substation name
- the approximate route length, or a range
- structure type, and whether right of way is existing or new
- right-of-way width in feet
- the local power company serving the area
- a schedule table

- an embedded ArcGIS map and downloadable PDF route maps
- a named TVA siting engineer with a telephone number

That is a substantial disclosure by the standards of most utility outreach. The pages are not thin. Chapter 5's finding is not that TVA says little. It is that TVA says a great deal about the *what* and nothing about the *for whom*.

4.3 What eight of eighteen say, and ten do not

Eight of the eighteen Tennessee pages tell property owners how many of them there are.[7] The sentence is identical in form on all eight:

> "Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 165 property owners representing about 225 parcels."

Project	Owners	Parcels
Appalachia Area Improvement	345	446
Bristol (South Bristol)	346	524
Cates Landing	37	62
Dickson	237	322
Gallatin (North Gallatin)	165	225
Hardin Valley	198	325
Lewis Chapel (Dunlap)	63	82
Tullahoma (Center Grove)	78	103

Across the eight, TVA discloses **1,469 property owners and 2,089 parcels**. Owner and parcel counts never appear separately. Of the ten pages without both figures, eight omit the sentence entirely. Two are more interesting: Lexington keeps the sentence stem verbatim and has been stripped of both numbers, and Fall Creek replaces it with a denial rather than an omission.[8]

The pattern is chronological rather than geographic. The count appears on multi-segment virtual-open-house projects from roughly 2021 to 2023, and is gone from the newer open-house format — 109 North in 2024, Fall Creek in 2024, Waldens Creek in 2025 — and from every single-route "virtual information session" page.[9]

Whether the disclosure was dropped deliberately or lost in a template revision is not established.[10] The effect is that a landowner on a project opened after 2023 cannot learn from the page how many neighbours are in the same position.

One page outside the census carries the largest count of all. The Middle Tennessee Generation & Transmission Capacity Expansion page records "about 391 property owners representing about 479 parcels."[11] That page is not on TVA's list of forty and is discussed in Chapter 12.

4.4 The other fields, counted

Across the eighteen Tennessee pages:[12]

Field	Present
Right-of-way width in feet	17 of 18
Some route mileage, range or preferred	17 of 18
Existing versus new right-of-way mileage split	**5 of 18**
Mileage attributed to each named alternative	**2 of 18**

The last row is the one worth pausing on. Only Gallatin states what each route option would cost in miles: Route 1 at 7.1 miles using 4.8 of existing right of way and 2.3 of new; Route 2 at 5.7 miles using 2 existing and 3.7 new.[13] TVA selected Route 2 — the shorter route requiring more new right of way. Appalachia gives comparative mileage for switching-station site ties rather than for whole routes, and is counted here on a strict reading; a looser rule would exclude it and return the count to one.

Everywhere else, a landowner comparing alternatives at an open house can see the lines on a map but cannot read from the page how much new corridor each option would take. That information exists; it is in the geometry TVA publishes through its GIS, and Chapter 8 computes it. It is not on the page.

The one page giving no mileage at all is Columbia (Fiberon), which is also the only Tennessee page with no Map section and the only one absent from both TVA GIS layers.[14]

4.5 The pages are configured not to be found

Every TVA transmission project page examined carries two directives in its HTML head:[15]

```
meta-robots: noindex
canonical: https://tva.com/energy/transmission/transmission-projects
```

`noindex` instructs a compliant crawler not to include the page in its index. It is an instruction, not a barrier: it binds the crawlers that honour it, and it has no effect on one that does not. The canonical tag is weaker still — it is advisory, a hint a search engine may follow or disregard. The canonical tag names a single directory URL as the authoritative version of every project page — not the index of current projects, which sits at `/transmission-system-projects/`, but the directory the project pages themselves live in. Eighteen distinct pages declare one URL canonical for all of them.

All eighteen Tennessee pages carry it, and all eighteen canonical to the parent index rather than to themselves. Not one is self-canonical.[16] Whether this is a deliberate configuration or a content-management default is **not established**, and this volume does not assert intent.[17]

It is not, however, what this content management system does to deep pages generally, and it is not what the comparator does at all. Three controls were run on 24 August 2026. Ten TVA transmission project pages across four states carry the directive, so the configuration tracks the project template rather than Tennessee. Thirteen TVA pages outside the project directory carry it once in thirteen, and that one, a lake-level dashboard, canonicals to itself. And **all eighteen Dominion Energy Virginia project pages carry no robots directive at all**, each canonical to itself.[18]

One thing cuts the other way and belongs here. TVA serves the same project content at a second, older path family, `/energy/transmission/transmission-system-project(s)/<name>`, and at that address the pages are self-canonical and carry no robots directive. The content is therefore not withheld from indexing; a copy of it remains indexable at the legacy address, and one page, Claysville, was caught mid-migration, carrying the directive at the new path while naming the stale sibling as authoritative. That is at least as consistent with an unfinished site migration as with anything else, and the volume does not claim otherwise.[19]

What the configuration establishes is what TVA instructed, and that is the finding: on all eighteen pages TVA asked search engines not to index the page and named a different URL as authoritative for it. What follows for any particular property owner in Sumner County searching their county and "TVA transmission line" depends on which engine they use and whether it honoured the directive, and this volume has not tested that.[17] The reliable routes to the page do not run through a search box. A reader gets there by starting at tva.com and navigating to Energy, then Transmission, then the projects index, then their state, then their project — or from the letter TVA mailed them, if they received one and kept it.

The same configuration has been offered as the most likely explanation for a second fact, and the legacy path above weakens that reading, because a page-level directive is a thin explanation for a site-wide refusal when the same content sits at a directive-free address. No `robots.txt` review was conducted, and that is the file that would govern it. On 16 August 2026 the Internet Archive declined to archive tva.com, returning: "We're currently facing some limitations when it comes to archiving this site."[20] The Archive holds sixteen captures of the North Gallatin page between 2021 and April 2025, so the limitation is recent. Crawlers have historically respected robots directives. That connection is plausible and unverified.[21]

The practical consequence for this volume is stated in the method note. The pages quoted here were captured and hashed into a Zenodo deposition, because no third party is preserving them. That deposition was published 18 August 2026 and its DOI resolves.[22]

4.5A Two things the coding turned up

The same wrong open house appears on two unrelated projects. Appalachia Area Improvement and West Tennessee Power System Improvements both carry a Public Involvement section describing an open house held on 27 June 2024 in **Piedmont,**

Alabama.[23] Neither project is in Alabama, and each page contradicts its own Background section: West Tennessee gives an open house of 26 October 2023 in west Tennessee, Appalachia one held over January and February 2023. Piedmont is in Calhoun County, Alabama — roughly 120 miles from Polk County, where the Appalachia work sits, and about 350 from Fayette, Haywood and Tipton, which West Tennessee crosses.

The same incorrect open house on two unrelated pages, carried verbatim onto one of them from a third project, is a content-management fault rather than a drafting error. The consequence for research is specific: TVA's public-involvement record on those two projects cannot be cited without qualification, because the page does not reliably describe its own process.

Ten of eighteen advertise an in-service date that has already passed. None is flagged as lapsed.[24] North Gallatin still shows winter 2023–24, two and a half years gone. Hardin Valley carries three mutually inconsistent in-service dates, one of which reads "Winter 2045-2025" and is not a date at all.

The inverse case is 109 North. It is the most recently updated page in the set, revised this month, and it is the only one carrying no forecast dates whatsoever — construction start and in-service both reset to "To be determined." The same update adds the sentence about towers sized for a future 500-kV circuit.

A schedule table that is never corrected is not a disclosure a landowner can plan around. It is a record of what TVA expected at the moment the page was written.

4.6 A page that exists and is not listed

The Middle Tennessee Generation and Transmission Capacity Expansion project has a live page. It sits at:

`/energy/transmission/transmission-system-projects/middle-tennessee-...`

Every project on the index sits at `/energy/transmission/transmission-projects/`. The Middle Tennessee page is a child of the index URL itself, and the index does not link to it.[25]

A member of the public working through TVA's list of forty projects will not encounter it. Its most recent update is dated April 2024. Chapter 12 covers what it says.

4.7 What the census is for

Two things follow from this chapter and both matter to what comes after.

The pages are detailed. Any argument that TVA withholds information wholesale is wrong and will be refuted by the first reviewer who opens one. TVA publishes route

alternatives, widths, structure types, schedules, maps and a named engineer's direct line. Compared to a great deal of utility public outreach this is generous.

The disclosure is uneven in a specific direction. What varies between pages is not effort. It is which categories of information survive: owner counts vanish after 2023, per-alternative mileage appears **twice** in eighteen, and the identity of the customer appears once in eighteen. The fields that would let a landowner assess *who benefits* are the fields that thin out.

Chapter 5 tests that directly.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. TVA, *Current TVA Transmission System Projects*, https://www.tva.com/energy/transmission/transmission-system-projects, retrieved 16 Aug 2026; capture deposited at 10.5281/zenodo.21959989. Count is of unique project names across the five populated state headings. **[P]**

2. Handoff memorandum, Tennessee Transmission Volume, 11 Aug 2026, project files. The discrepancy is not resolved. **[P] Open item, Appendix F §F.1.**

3. Structure common to the archived page captures, deposit 21959989. Appendix D §D.2 records that the working-directory paths are not the deposit's own filenames; cite the deposit filenames at Appendix D §D.3. **[P]**

4. Compared across the deposited captures of all eighteen Tennessee project pages, deposit 21959989, whose deposit filenames are at Appendix D §D.3. Identical text on all eighteen. **[P]**

5. TVA, *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, eight documents covering 27 Apr. 2020 – 31 Mar. 2026, 11,899 records, retrieved 17 Aug. 2026; per-project table at Chapter 3 §§3.2–3.3 and notes 7–10, retrieval route and truncation cautions at Chapter 3 note 5, and in full at `TVA_CE_Determination_Research_v0_1.md`. The nine projects carry eleven register entries: CEC 42028 and 47568 (North Gallatin), 47201 (Hardin Valley), 48399 (Tiptonville), 48005 (Tiny Town Road), 49356 (Lewis Chapel), 49618 (Cates Landing), 50079 twice (Center Grove/Tullahoma), 51691 (Riceville) and 54096 (Fall Creek), all exclusion 16. Nine projects, eleven entries, because North Gallatin and Tullahoma each carry two. The two assessments are TVA, *Bristol, Tennessee Area Power Improvement Project, Final Environmental Assessment* and finding of no significant impact, 19 Apr. 2024, and TVA, *North Dayton Power System Improvements, Final Environmental Assessment* and finding, both 30 Oct. 2020. **[P]**

6. Bristol and North Dayton were captured on 17 August 2026 and are in the deposit: `TVA_page_capture_bristol_south_bristol_20260817.txt` and `TVA_page_capture_north_dayton_20260817.txt`, deposit 21959989, hashes at Appendix D. Bristol's Environmental Reviews section is the unchanged two-paragraph boilerplate and carries no link, no docket and no statement of review status. North Dayton's Environmental Reviews section is likewise unchanged; the link to its Final EA and FONSI appears in a separate "Update – November 2020" block at the head of the page, pointing to `https://www.tva.com/environment/environmental-stewardship/environmental-reviews/nepa-detail/north-dayton-power-system-improvements`, which was resolved and read on 17 August 2026 and carries both documents. The title mismatch is on the same capture: the NEPA detail page reads "North Dayton Power System Improvements," the project page "North Dayton, Tennessee." **[P]**

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7. Coded census of all eighteen Tennessee project pages, Aug 2026. Full verbatim table at Appendix A. **[P]**

8. Ibid. The absence was checked page by page. **[P]**

9. Ibid., grouping by page format and update date. **[I]** — the chronological reading is the author's; TVA states no policy.

10. No TVA statement on the change was located. **[P, negative] Open item, Appendix F §F.1.**

11. TVA, *Middle Tennessee Generation and Transmission Capacity Expansion Project*, capture 16 Aug 2026, `TVA_page_capture_middle_tennessee_gt_20260816.txt`, deposit 21959989. **[P]**

12. Coded census, Appendix A. **[P]**

13. TVA, *Gallatin, Tennessee (North Gallatin)*, capture 16 Aug 2026, `TVA_page_capture_north_gallatin_20260816.txt`. **[P]**

14. TVA, *Columbia, Tennessee (Fiberon)*, capture 16 Aug 2026, `TVA_page_capture_columbia_fiberon_20260816.txt`; absence from GIS layers confirmed against the register crosswalk, Appendix B. **[P]**

15. HTTP response headers and document head, retrieved 16 Aug 2026. **[P]**

16. All eighteen pages checked individually, 16–17 Aug 2026, and confirmed against the deposited captures of all eighteen; Appendix A §A.2, count 7. **[P]**

17. No TVA statement located; no robots.txt review conducted. `noindex` is a directive to compliant crawlers and the canonical link element is advisory; neither compels a search engine, and no search was run against any engine to test what a property owner would actually be shown. What is established is the instruction TVA gave, on all

eighteen pages, not the result in any given search. **[P, negative] Open item, Appendix F §F.1.**

18. Controls run 24 Aug. 2026 by direct fetch of the document head. TVA project pages carrying `meta-robots: noindex` with a canonical to the parent directory: ten of ten tested, in Tennessee, Mississippi, Alabama and Kentucky. TVA pages outside the project directory: one of thirteen, `environment/lake-levels`, and that one self-canonical. Dominion Energy Virginia project pages: **nought of eighteen** carry any robots directive, and all eighteen are self-canonical. The eighteen Dominion slugs are those coded in the Virginia falsification test. **[P]**

19. Ibid. Legacy path family confirmed on Mulberry, Alabama and Sundown Drive, Alabama, both self-canonical with no robots directive; Claysville, Alabama carries `noindex` at the current path while its canonical names `transmission-system-project/claysville-alabama`. **[P for the configurations; I for the reading that migration is a sufficient explanation]** — no TVA statement of intent has been located and none is asserted.

20. Internet Archive Save Page Now, response to save request for tva.com URLs, 16 Aug 2026. **[P]**

21. **[I]** — author's inference from the coincidence of the directive and the refusal. Not confirmed with the Internet Archive. **Open item, Appendix F §F.1.**

22. See the method note and Appendix D. Zenodo deposition 21959989, DOI 10.5281/zenodo.21959989 **published 18 Aug. 2026**, per Appendix D §D.7. **[P]**

23. Coded census, Appendix A §A.6; verbatim paragraph reproduced there. **Confirmed from the deposited captures, 17 August 2026:** `TVA_page_capture_appalachia_area_improvement_20260817.txt` and `TVA_page_capture_west_tennessee_power_system_improvements_20260817.txt`, deposit 21959989, hashes at Appendix D. Appalachia carries New Liberty, Alabama's Piedmont paragraph verbatim and West Tennessee carries a reworded version of it; Appendix A §A.6.1 identifies the donor. Both captures carry the paragraph in their Public Involvement sections, and both carry the contradicting Background text on the same page. The distances are straight-line from Piedmont, Calhoun County, Alabama. **[P]**

24. Coded census, Appendix A §A.1 and the deposited field detail at §A.5, schedule rows against the retrieval date. **[P]**

25. URL path comparison across the index and all project links, 16 Aug 2026. **[P]**

Chapter 5 — The Disclosure Test

All eighteen Tennessee project pages coded August 2026. Endnotes carry evidence grades.

5.1 The test

Every TVA transmission project page states a purpose. The test is simple: read the stated purpose of all eighteen Tennessee projects and code each one for whether it identifies who the line is for.

Three codes. **(a)** names a specific end-use customer. **(b)** names a load type without naming the customer — "a data center," "an industrial customer." **(c)** general growth or reliability language naming neither.

The result:[1]

Code	Count
(a) names a customer	**1**
(b) names a load type	**0**
(c) names neither	**16**
outlier — names an interconnection counterparty rather than a load	1

5.2 The sentence

All sixteen general-language pages use near-identical wording, and fourteen of them carry the formula word for word.[2] The template:

> "TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in [place]."

Fourteen, verbatim, with only the place changing:

- **109 North:** "…in Sumner County in Tennessee."
- **Appalachia:** "…in the Appalachia area of Polk County in Tennessee and Cherokee County in North Carolina."
- **Bristol:** "…in the Bristol, Tennessee area."
- **Cates Landing:** "…in the Tiptonville area of Lake County in Tennessee."
- **Dickson:** "…in the Dickson area of Dickson and Hickman Counties."
- **Fall Creek:** "…in the Wilson and Rutherford County areas in Tennessee."
- **Gallatin:** "…in the Gallatin area of Sumner County."
- **Hardin Valley:** "…in Knox and Loudon Counties in Tennessee."
- **Lewis Chapel:** "…in the Dunlap area of Sequatchie County."
- **Lexington:** "…in Henderson and Chester Counties in Tennessee."

- **Riceville:** "…in the Riceville area of McMinn County in Tennessee."
- **Tullahoma:** "…in the Center Grove area of Franklin County Tennessee."
- **Waldens Creek:** "…in the Waldens Creek and Wears Valley area of Sevier County in Tennessee."
- **West Tennessee:** "…in the Fayette, Haywood, and Tipton County areas in Tennessee."

Two that vary the wording and change nothing else. North Dayton inserts a word — "for growing *electrical* load and increase power reliability in the Dayton area." Tiny Town Road inverts the clause order and keeps every element: "…in the Clarksville area in Montgomery County and in Christian County in Kentucky."[3]

That is the whole variation across sixteen projects in five states over roughly a decade. The sentence is a form field.

One page carries a second, later statement of purpose, and it names no one either. 109 North's August 2026 update opens: "As regional growth drives rising electric demand, TVA must build new transmission lines and generation assets to maintain system reliability for everyone we serve."[4] The page appears once in the count above, on its original text; this is the same page four years on, still not naming a customer.

5.3 The one that names a customer

Columbia (Fiberon):[5]

> "TVA is considering improvements to its transmission system that would provide power for growing industrial load and increase power reliability in the Columbia area of Maury County in Tennessee.
>
> Fiberon will establish a manufacturing and distribution facility in Columbia, Tennessee, potentially creating over 300 new jobs over the next several years. The new facility will be located on Oakland Parkway northwest of State Highway 43 in west Columbia, and its operations will require a 161-kilovolt substation."

Note what the first sentence does. It follows the template exactly, with one word changed: *growing industrial load* rather than *growing load*. Then the page names the company, the product, the job figure, the street, and the substation the customer requires.

Naming the customer is available to TVA, it fits in two sentences, and TVA has written those sentences.

Fiberon is a composite decking and cladding manufacturer, and the line is 161 kV in Maury County. There is no obvious respect in which this project is more suitable for disclosure than any of the other seventeen.[6]

The complication belongs here. The Fiberon page is the thinnest in the entire Tennessee set. It has no Map section, no schedule, no Public Involvement section and no route mileage, and it is the one Tennessee project absent from both of TVA's GIS layers.[7] The single page

that names its customer discloses less about the physical project than any page that does not.

Two readings are available and the evidence does not choose between them. The page may be thin because it was written early and never developed, in which case the customer's name is a residue of a first draft rather than a disclosure. Or naming the customer may be what a page does *instead* of describing the line. This volume does not adjudicate between them, and any argument that Fiberon represents TVA's fuller disclosure practice is wrong.

What survives either reading is the contrast, because the question the test asks is narrow: does the page name who the line is for. Fiberon's does. The other seventeen do not. Chapter 6 sets the same pair against TVA's own engineering files.

5.4 The outlier

Tiptonville names Associated Electric Cooperative, Inc.[8]

> "TVA is considering improvements to its transmission system that would increase the transmission import capacity with Associated Electric Cooperative, Inc. (AECI), in the Tiptonville area in Lake County."

AECI is a neighbouring generation and transmission cooperative — an interconnection counterparty rather than a load being served. It is coded separately, because naming the utility on the other end of a tie line is a different act from naming the customer whose demand justifies a line.

5.5 How close the near misses get

Three pages come close enough to show that the omission is not a drafting limitation.

Lewis Chapel. The stated purpose is general. The Background section says:[9]

> "the Sequatchie Industrial Park … is growing and has had several inquiries from industries that could potentially add to the existing electrical load. With these large industrial loads coming online, SVEC would need additional capacity…"

TVA can describe a large industrial load in the body while keeping it out of the purpose.

Bristol. "BTES has received several inquiries from potential customers about locating at their industrial parks."[10]

Cates Landing. The line is described as extending "north to the Lake County Industrial Park" — a destination, not a purpose.[11]

In each case TVA has the vocabulary and the information. What it does not do is put a name in the sentence that answers *why*.

5.6 What appears nowhere

Across all eighteen pages, in any section:[12]

- No data centre is named.
- No hyperscaler is named — no Meta, Google, Amazon, Microsoft, Oracle or Nvidia.
- The words “data center” and “datacenter” do not appear.
- **No megawatt figure appears anywhere.** Not a load figure, not a project capacity, not a transfer capability. Each of the eighteen pages was checked individually for “MW” and “megawatt” in any context. The count is zero on all eighteen.

The last is the most striking absence and the easiest to overlook. Eighteen pages describing transmission projects, with voltages, mileages, structure types and right-of-way widths, and not one number in megawatts.

West Tennessee Power System Improvements deserves naming here. It covers Fayette, Haywood and Tipton Counties, fed from the Stanton 500-kV substation in the BlueOval City corridor — Ford’s battery and truck complex, one of the largest industrial developments in the state’s history. Its stated purpose names nobody, and the project has been on hold since September 2024.[13]

5.6A The other thing the page does not name

The test in this chapter is about customers. One more field behaves the same way and can be measured the same way, so it belongs here.

Every project page carries an Environmental Reviews section. Its template paragraphs are identical across all eighteen; they describe what TVA will do in the abstract and name no document.[18] Behind it, for eleven of the eighteen projects, something had in fact been decided. Chapter 4 §4.2 sets out the evidence: nine completed categorical exclusion determinations, and for Bristol and North Dayton a full final environmental assessment and a finding of no significant impact, of 19 April 2024 and 30 October 2020.[19]

Bristol is the one worth stating plainly. It is the second-largest disclosure on the census by owner count — 346 owners across 524 parcels — and TVA wrote an environmental assessment for it and made a finding on the record. A property owner reading the Bristol page for the section headed “Environmental Reviews” would learn that TVA conducts environmental reviews.[20]

The field behaves like the customer field in one respect. The Environmental Reviews section identifies no document on any of the eighteen pages, *including the two pages where a document exists*.[21]

It is **invariant to whether review happened** — which is precisely how the purpose sentence behaves with respect to the customer, and it is why the two fields belong in the same chapter.

The point remains narrower than the customer-naming finding and should not be stretched past it. TVA is not obliged to link its assessments from a siting page, and the assessments are published elsewhere on tva.com. What the count supports is the pattern the chapter is already tracing: the pages describe process generously and identify outcomes not at all.

5.7 The exception the chapter has to concede

One TVA page is markedly more forthcoming than the rest, and it is not on the census.

The Middle Tennessee Generation and Transmission Capacity Expansion page explains fault-induced delayed voltage recovery, describes why inverter-based resources do not support system stability the way spinning generation does, and lists five specific benefits of the expansion.[14] It gives a real engineering rationale of a kind that appears nowhere in the eighteen.

It still names no customer. But any claim that TVA's transmission pages are uniformly generic must exempt this one.

5.8 Generation that no document identifies

109 North was updated in August 2026 with a sentence that is not general at all:[15]

> "The structures installed on the existing TVA easement will be lattice steel towers that can support both the current 161-kV line and a future 500-kV line as electric generation is added in the area."

That is a specific forward commitment. Building for a 500-kV circuit is a different order of infrastructure from a 161-kV feed, and TVA says why: generation is coming.

No filed document located by the searches described identifies it. TVA's environmental reviews index carries no environmental assessment and no environmental impact statement for new generation in Sumner County, and a Federal Register search returns none. The categorical exclusion register was searched by transmission project name and has not been searched for generation actions in the county, so that limb is not claimed.[16] TVA's own generation siting dataset places 15,441 Sumner County tax parcels inside its areas of interest at initial feasibility as of July 2025, which is evidence that TVA was looking, and is not a proposal.[17]

So the page discloses a reason no reader can verify, in support of a structure the reader can see.

5.8A Three coding decisions that move the count

Coding is a judgment and three calls here are load-bearing. The first two are recorded at Appendix A §A.2 so a reader can re-code.

North Dayton mentions Nokian Tyres. It appears only as a property the line crosses, never as a load the line serves, so it is coded as naming neither. Coded the other way, the "names neither" count falls from sixteen to fifteen.

Tiny Town Road is counted among the five pages giving an existing-versus-new right-of-way split, on the basis that it states the route is entirely within existing right of way. West Tennessee, which gives a partial split, is excluded. Moving either changes the count to four or six.

The third moves the count furthest. The scheme has three codes — names an end-use customer, names a load type, names neither — and it has no cell for a page that names a *place where industrial load is going*. Three pages sit in that gap and all three are coded as naming neither:

- **Cates Landing** names the Lake County Industrial Park.
- **Lewis Chapel** names the Sequatchie Industrial Park and describes large industrial loads coming online.
- **Bristol** names BTES industrial parks and refers to inquiries from potential customers.

Each names something more specific than an area and less specific than a customer. Coded as naming a load type, the headline moves from **sixteen of eighteen to thirteen of eighteen**, and the "names a load type" column moves from zero to three. That is a larger movement than either decision above.

The coding is left as it stands, for a stated reason: an industrial park is a place, a landowner reads it as geography, and none of the three pages says what will be built or how much load it will draw. But the reader should know that the count is three recodings away from a materially smaller number, and that the direction of the finding — pages describe route in detail and load in the abstract — survives all three recodings, because none of the three names a customer or a megawatt figure.

All three are stated because a coded census whose rules are invisible is not evidence.

5.9 What the test establishes

Sixteen of eighteen stated purposes name no customer and no load type. One names a customer. That is the measurement.

What it does not establish, on its own, is that TVA possesses the identity it omits. A utility might reasonably describe a line by the area it serves rather than by one customer among many, and for a genuinely diffuse load that description would be accurate.

The next chapter closes that gap. TVA's own engineering files name customers, in the same organisation, published on the same terms. Within the eighteen-page census they do so for **two** projects — North Gallatin, whose files carry the word Facebook, and Columbia, whose page already names Fiberon. They also carry names for work that has no page in the census at all: Ultium – Night Sky in Maury County, which is a customer's project name, and the Memphis Regional Megasite, which is a place. Chapter 6 §6.4 sets out the difference and why only the first is a customer name. The distinction is the sharper point, and Chapter 6 §6.7 makes it.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S^1] single source, [I] author inference.

1. Coded census of all eighteen Tennessee project pages, August 2026; full verbatim table at Appendix A. Coding performed on the stated purpose or background statement, not on incidental mentions elsewhere. **[P]**
2. Ibid. Verbatim comparison of the sixteen. **[P]**
3. Coded census, Appendix A §A.3, which reproduces all sixteen purpose statements verbatim so a reader can re-code them. Fourteen are verbatim; North Dayton and Tiny Town Road vary the wording; all sixteen are near-identical. Chapter 6 note 55 states the same. **[P]**
4. TVA, *109 North, Tennessee (Sumner County)*, August 2026 update, capture 16 Aug 2026, `TVA_page_capture_109_north_sumner_county_20260816.txt`, deposit 10.5281/zenodo.21959989. **[P]**
5. TVA, *Columbia, Tennessee (Fiberon)*, July 2023 update, capture 16 Aug 2026, `TVA_page_capture_columbia_fiberon_20260816.txt`. **[P]**
6. **[I]** — the author's judgment. TVA has given no account of why Fiberon was named and Facebook was not, and none is on the public record. The question is left open. It is a records-request target: the companion guide, request T7. **Open item, Appendix F §F.1.**
7. Coded census, Appendix A §A.6.3 and Chapter 4 §4.4. The Fiberon page is the only one of the eighteen with no Map section, the only one giving no route mileage, and the only one absent from both `TSSProjects_Hosted` layers 0 and 5; register crosswalk at Appendix B §B.3. **[P]**
8. TVA, *Tiptonville, Tennessee (Tiptonville-New Madrid No. 2)*, coded census. **[P]**
9. TVA, *Lewis Chapel, Tennessee (Dunlap)*, coded census. **[P]**
10. TVA, *Bristol, Tennessee (South Bristol)*, coded census. **[P]**
11. TVA, *Cates Landing (Lake County, Tennessee)*, coded census. **[P]**
12. Page-by-page check of all eighteen for each term, 16 Aug 2026; Appendix A §A.2, count 8. **[P, negative]**
13. TVA, *West Tennessee Power System Improvements*, coded census; hold status stated on the page as of September 2024. **[P]**

14. TVA, *Middle Tennessee Generation and Transmission Capacity Expansion Project*, capture 16 Aug 2026, `TVA_page_capture_middle_tennessee_gt_20260816.txt`. **[P]**
15. 109 North capture, above. **[P]**
16. TVA environmental reviews index and Federal Register search, August 2026. **Bounded 17 Aug. 2026.** The "no categorical exclusion" limb of this negative does not rest on TVA's published lists of completed categorical exclusion checklists (Chapter 3 note 5). Those eight documents carry 11,899 determinations across every TVA business unit for 27 Apr. 2020 – 31 Mar. 2026, and they were searched by transmission project name, **not** for generation actions in Sumner County. Until that search is run the limb rests on the environmental reviews index and the Federal Register alone. **[P, negative] Open item, Appendix F §F.1.**
17. TVA, `GeneSIS_Layers` FeatureServer, layer 1, county query, retrieved 15 Aug 2026, deposit 21959989. Snapshot dated 30 July 2025 by TVA. **[P]**
18. Chapter 4 §4.2 and note 4: the Environmental Reviews section compared word for word across the deposited captures of all eighteen Tennessee project pages, and identical on all eighteen. **[P]**
19. TVA, *Lists of Completed Categorical Exclusion Checklists*, eight documents, 27 Apr. 2020 – 31 Mar. 2026, 11,899 records, retrieved 17 Aug. 2026; the nine determinations and the two assessments are itemised at Chapter 4 note 5 and set out project by project at Chapter 3 §3.2 and notes 7–10. **[P]**
20. Owner and parcel counts from the coded census, Appendix A §A.1 (Bristol 346 / 524, second only to Appalachia's 345 / 446 by owners and first by parcels). The environmental assessment and finding are at note 19. The sentence about what a reader would learn now describes the Bristol page as captured, not the template in general; see note 21. **[P]**
21. Bristol and North Dayton were captured on 17 August 2026 — `TVA_page_capture_bristol_south_bristol_20260817.txt` and `TVA_page_capture_north_dayton_20260817.txt`, deposit 21959989, hashes at Appendix D — and both sections are the unchanged two-paragraph boilerplate. Bristol carries no link, no docket number and no statement of review status of any kind. North Dayton carries the boilerplate in the same section and links its Final EA and FONSI from a separate "Update – November 2020" block at the head of the page; the NEPA detail page it points to was resolved and read on 17 August 2026 and carries both documents. The absence of a link *from the Environmental Reviews section* is established on all eighteen, and the presence of a link elsewhere on one of them is established too. Both are stated. Chapter 4 note 6 records the same. **[P]**

Chapter 6 — The Record Nobody Is Directed To

All service names, item identifiers and counts verified 15 August 2026 and archived at `gis_archive_20260815/`, manifest with sha256 per file. Cite the archived file rather than the live endpoint: the source is editable by its owner.

6.1 One file name

The Tennessee Valley Authority publishes a map service called:

> `Facebook_North_Gallatin_Alternative_Transmission_Line_Route`

It is a hosted feature service in TVA's ArcGIS Online organization, item identifier `9e1b4cf2d7534b1e8405ea123c37a5c5`, owner organization `w8auYAijfGK1Mydj`.[1] It requires no login, no token and no credential of any kind.[2] Its extent covers north Gallatin, in Sumner County, Tennessee. It contains sixteen line segments and two attribute fields, neither of which says anything: a feature identifier and a length.[3]

The name is the disclosure.

TVA's public project page for the transmission line in that place describes the reason for building it this way:

> "TVA is considering improvements to its transmission system in order to provide power for growing load and increase power reliability in the Gallatin area of Sumner County."[4]

Those two statements were published by the same federal corporation about the same line. One of them identifies a customer. The other is the one a property owner is directed to, and it identifies no one.

6.2 What TVA publishes, and how much of it

TVA's ArcGIS Online organization holds **302 public feature services** and **764 public items** of all types.[5] Roughly 230 of the services concern transmission line siting. They cover about forty distinct named projects.[6] There are no folders; everything sits at the root of the service directory, which is why the whole catalogue enumerates in a single unauthenticated request.[7]

Twenty-nine of those services are parcel or tax-parcel layers and thirty carry a right-of-way token.[8]

This scale matters for a reason that has nothing to do with any individual project. A reader who has followed TVA's public-facing transmission pages has seen forty projects. TVA's own catalogue, published on the same terms and equally public, contains several hundred

separately named layers describing those projects and others in far greater detail than the pages do. The pages are a summary of the catalogue, not the other way round, and the summarising is where the discretion happens.

6.3 The naming pattern

TVA names its siting layers by project family and layer type. The pattern is consistent enough to predict. A project called Riceville produces `Riceville_Study_Area`, `Riceville_Existing_Transmission_Lines`, `Riceville_Existing_ROW`, `Riceville_Proposed_Route_ROW`, `Riceville_Proposed_Transmission_Route`, `Riceville_Transmission_Stations`, `Riceville_Transmission_Structures`, `Riceville_Affected_Parcels` and `Riceville_Railroads`.[9]

The layer-type vocabulary recurs across every family: study area, alternative routes, routes with segments, preferred route segments, centerline, existing transmission lines, existing right of way, proposed right of way, vacant right of way, affected parcels, affected tax parcels, substations, stations, metering stations, switching station, transmission structures, tap point alternatives, delivery point, double circuit, rebuild, greenfield, open house.[10]

The project-family prefix is where the interesting variation lives. Most are places. Riceville, Tiny Town Road, Sundown Drive, Jones Chapel, Harding Springs–Gladstone, Florence–Iron City, North Oakland–Coffeeville, South Macon–DeKalb, West Lexington–Jacks Creek.[11] A landowner reading those names learns the same thing the public page tells them, which is where the line goes.

Some are not places.

6.4 The customers TVA names in its own files

Fiberon. Seven services: `Fiberon_Affected_Parcels`, `Fiberon_Double_Clircuit_Rebuild_L2522`, `Fiberon_L2522_Reroute`, `Fiberon_Substation`, `Fiberon_Transmission_Structures`, `FiberonTransmission_Lines`, `Fiberson_16kV_Tap`.[12] Fiberon is a composite decking manufacturer.[13] The project is in Maury County.[14]

Facebook. One service, described above, in Sumner County.[15]

Ultium – Night Sky. A selected centerline in TVA's project register, project identifier 539168, running 1.1 miles at Spring Hill in Maury County.[16] Ultium Cells is the General Motors and LG Energy Solution battery joint venture. "Night Sky" was General Motors' internal name for the plant, used in the traffic study, the archaeological survey and the state transportation impact analysis before TVA ever drew a line.[17]

Memphis Regional Megasite. A project family named for the industrial site it serves.[18]

Transpark East. Thirteen services, named for the Kentucky Transpark, an economic development megasite outside Bowling Green.[19] The layer names carry the internal geography of the deal: `Transpark_East_Alternative_Route_Site_1`, `Transpark_East_Site_B`, `Transpark_East_Alt3BGto_I65`.

Cates Landing. Four services, named for the Lake County river port and industrial park.[20]

Moore County Solar, **Millington – Solar**, **Magnolia Solar**. Named for the resource being interconnected.[21]

Redstone Arsenal No. 3. Named for the federal installation.[22]

Commerce Park 2. Named for the industrial park.[23]

Also present, naming the distribution utility rather than the end user: `LCUB_Proposed_New_Substation_Site` for Lenoir City Utilities Board, `BTES_69kV_ROW` for Bristol Tennessee Essential Services, `LewisChapel_SVEC_Sub_Site` for Sequachee Valley Electric Cooperative.[24]

Those names are not one category. Set out by what the name actually refers to, the list divides five ways:

What the name refers to	Cases	Would a landowner read it as a customer?
A private end-use customer	Fiberon, Facebook, Ultium – Night Sky	Yes
An industrial park or megasite	Memphis Regional Megasite, Transpark East, Cates Landing, Commerce Park 2	No — these are place names
A generating resource being interconnected	Moore County Solar, Millington – Solar, Magnolia Solar	No
A federal installation	Redstone Arsenal No. 3	No
The distribution utility, not the end user	LCUB, BTES, SVEC	No

Only the first row is a customer name in the sense this volume's argument requires. It contains three cases, in two counties. Any claim that the convention runs "across a decade and dozens of projects" is carried almost entirely by the four rows beneath it, which are names a property owner would read as geography, infrastructure, or their own electric co-operative.

The disaggregation matters because §6.6 answers the careless-analyst objection by counting services: seven on one project, thirteen on another, four on a third. Two of those three are Transpark East and Cates Landing, which is to say the answer is built on the weaker category. The count of services is real and it establishes that the naming is

systematic rather than accidental. It does not establish that the thing being named is systematically a customer.

What survives is smaller and is enough. TVA's engineering catalogue sometimes preserves the identity of the private party a line is being built for. Three Tennessee cases are documented here. In one of them the same identity appears on the landowner-facing page; in another it does not. That is a demonstration of what the two channels can do, and Chapter 14 §14.7 records why it cannot be turned into a claim about practice: only three of the eighteen projects had a nameable customer to begin with.[25]

6.5 The within-institution contrast

Fiberon and Facebook are the two cases where a named private customer appears in TVA's file naming for a Tennessee transmission project. They are close enough to compare.[26]

	Fiberon	Facebook
County	Maury	Sumner
Voltage	161 kV	161 kV
Named in TVA's GIS service names	yes, 7 services	yes, 1 service
Named on TVA's public project page	**yes, in the title**	**no**

The Fiberon page is one of eighteen Tennessee project pages. It is the only one that names an end-use customer, and it does so twice. The title reads "Columbia, Tennessee (Fiberon)." The body reads:

> "Fiberon will establish a manufacturing and distribution facility in Columbia, Tennessee, potentially creating over 300 new jobs over the next several years. The new facility will be located on Oakland Parkway northwest of State Highway 43 in west Columbia, and its operations will require a 161-kilovolt substation."[27]

That is what full disclosure looks like when TVA chooses it. A landowner on that route can read the page and know who the line is for, what the customer will build, and where.

The North Gallatin page, for a line whose engineering files carry the word Facebook, says growing load and power reliability.[28]

The pair is what makes this a finding rather than an anecdote. One siting organisation, one naming pattern, one file directory, two industrial customers, two different public treatments. Nothing about the comparison depends on knowing why.

One complication. The Fiberon page is the thinnest in the entire Tennessee set. It has no Map section, no webmap, no schedule table, no Public Involvement section, no route mileage, and no owner or parcel count. Every other page has most of these; Fiberon has none.[29]

So the page that discloses who the power is for discloses least about the project itself.

Chapter 5 §5.3 states the two readings available, and the evidence does not choose between them.[30]

What the complication does not do is dissolve the pair. The question the volume asks is whether TVA names the customer, and on that field the two pages differ completely while sitting in the same directory and the same voltage class, under the same naming convention, produced by the same siting organisation. They are not in the same county — Fiberon is Maury, Facebook is Sumner, as the table above states — and nothing in the comparison needed the county to be shared.

6.6 What the name does and does not prove

The service name is a fact about a file. It is not a statement by TVA that the line serves Meta, and this chapter does not make that claim.

What the name establishes is narrower and harder to argue with. Someone inside TVA's transmission siting function, working on the North Gallatin project, understood the project well enough to name a routing layer after the customer, and recorded that understanding in a system TVA publishes to the world.[31] The same function, on the same kind of project, put the customer's name in the title of a public page two and a half years later.[32]

The obvious objection is that a GIS analyst named a shapefile carelessly and it signifies nothing about disclosure policy. The objection has force, and the answer is Fiberon. If naming a layer after the customer were an idiosyncratic slip, it would not recur across seven services on one project, thirteen on another, and four on a third.[33] And if the naming were merely internal shorthand with no relationship to what TVA tells the public, Fiberon would not appear in a page title.

A second objection: Facebook is a well-known company with a publicly announced data centre in Gallatin, so nothing was concealed. The company announced the facility in August 2020, and the state announced it alongside them.[34] That is true and it cuts the other way. TVA had no confidentiality problem to solve. The customer was public, the investment was public, the state's press release named TVA as one of three recruiting partners.[35] Naming the customer on the project page would have disclosed nothing that was not already disclosed, and TVA still did not do it.

Note also that the service says Facebook rather than Meta. The company renamed itself on 28 October 2021.[36] The service was created on 23 December 2020, four weeks before TVA announced the project.[37] The file name preserves the vocabulary of the moment the work was done, which is consistent with it being a working artifact rather than a later reconstruction.[38]

6.6.1 The tag on the map that is on the page

The service name is a slug, and a sceptic can dismiss a slug. The web map is harder.

TVA publishes a web map, item `da8380d3b792460fb666310e3e5d22ab`, owner `TVA-GIS`, access public, titled “North Gallatin, TN Virtual Open House.” It is the map TVA built for the project’s virtual open house.[39] Its public tags are:

```
['siting', 'Facebook North Gallatin Virtual Open House']
```

That is not a filename. It is a human-readable descriptive tag, written as a phrase, attached to the interactive map that a Sumner County property owner opened when they visited the virtual open house to find out where the line would go.[40] Created 23 December 2020, last modified 30 July 2025.[41]

The display titles do not carry the name. The service names, the layer names and the tags do.[42] A landowner looking at that map saw “North Gallatin, TN Virtual Open House.” The same object, in the same catalogue, published by the same account on the same day, is tagged with the customer’s name.[43]

6.6.2 Nothing was removed

The Internet Archive holds sixteen captures of the North Gallatin page between March 2021 and April 2025, collapsing to three distinct body texts, and six captures of the 109 North page collapsing to two.[44] Every difference in the chain is additive or clerical: an update block prepended, the earlier text demoted under a “Background” heading, a contact name changed, an email address obfuscated.[45]

No substantive sentence is ever deleted. The 2021 text survives verbatim under “Background” five years later.[46]

This matters because it forecloses the most charitable reading. There was no scrub. TVA did not name the customer and then think better of it. The name was never on the page, in any version, at any point, while the same organisation’s catalogue carried it continuously from December 2020 to the present.[47]

Thirty-eight archived versions of the four associated press releases show the same thing. So does the virtual open house splash page.[48]

The one gap: the page went live around 21 January 2021 and the earliest capture is 2 March 2021. Six weeks are unarchived. The negative is airtight after that date and merely strong before it.[49]

6.7 The line that has a name and no page

Ultium – Night Sky sharpens the point, because there the public record contains no TVA page at all.

TVA’s register carries the route. TVA’s own engineers named it for the customer. No project page was published, and no TVA environmental *document* names it.[50] The scope of the line appears in exactly one independently published external document: an appendix to the Department of Energy Loan Programs Office’s environmental assessment for the battery

plant, where the Tennessee Historical Commission wrote to DOE in July 2022 acknowledging

> "the TVA's status as lead federal agency for the construction of the Ultium Night Sky 161-Kv Transmission Line."[51]

The line is 1.1 miles. It runs inside a thirteen-acre utility corridor on the southwestern side of the plant site.[52] Its local power company is Columbia Power and Water Systems, the same distributor as Fiberon, in the same county, at the same voltage, in an overlapping period.[53]

Fiberon received a page naming the customer. Ultium received no page. The difference in public treatment between two projects of the same class, in the same county, served by the same utility, is total.

The fullest public description of what the line is, where it runs and who it serves exists only because federal loan money forced a conversation between two agencies about which of them was the lead for Section 106, and the correspondence got printed.[54]

TVA's published register of completed categorical exclusion checklists carries **CEC 47184, "Project Night Sky - TVA Ultium, TN 161kV Switching Station and Loop Line," Maury County, Tennessee, closed 11 August 2022, categorical exclusion 16.**[64]

So there is a TVA environmental record for this line, it is public, and **the customer's private project name is in its title.** The same label TVA's siting engineers put on the geometry, TVA's NEPA compliance function put on the determination. What that row does not contain is anything a landowner could have used — no assessment, no finding, no scoping, no comment period, no route, and no reasoning, because TVA publishes the register and not the checklist.[65] The name reached the public record twice. The line never got a page.

6.8 Against the census

The naming pattern has to be read against what the pages say. Across the eighteen Tennessee project pages published as of August 2026:

- **Sixteen** state a purpose that names no customer and no load type. All sixteen use near-identical template language, fourteen of them verbatim: *TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in [place].*[55]
- **One** names a customer: Fiberon.[56]
- **One** names an interconnection counterparty rather than a load: Tiptonville, which identifies Associated Electric Cooperative.[57]

Sixteen of eighteen is the number that matters, and what it measures is the page. The template is not a failure to have the information. TVA's own files, published on the same infrastructure, carry the customer's identity for two of these eighteen projects, and for one

more that was never given a page at all, the Ultium – Night Sky line; the other unpaged families §6.4 disaggregates are named for places rather than for customers.[58]

So the silence is a property of the channel a property owner is directed to, and not of the institution's records. That is as far as the evidence reaches. It does not establish a rule, and it does not establish that anyone decided anything: three cases are not a practice, Chapter 14 §14.7 states the denominator, and Chapter 15 §15.4 states what remains unproven.

6.9 Why this is fixed in an archive

Everything in this chapter is a string in a live system that TVA can edit at any time. A service can be renamed in under a minute, and renaming `Facebook_North_Gallatin_Alternative_Transmission_Line_Route` to `North_Gallatin_Alternative_Route_2` would eliminate the evidence without any record that it had existed.[59]

For that reason the service directory, the service definitions, the layer metadata and the geometry were retrieved on 15 August 2026 and written to disk with a SHA-256 hash for each file. The manifest is Appendix D.[60] Every claim in this chapter about the GIS artifacts cites the archived copy. The exceptions are at notes 5, 44 and 48, and Appendix F §F.1 lists them. The live endpoints are given for verification, with the understanding that they may no longer return what is quoted here.

The plainest statement of the position is this. The service name, the layer name and the web map tag exist in two places on earth: on TVA's own ArcGIS Online server, where TVA can change or delete them without notice and without leaving a trace, and in the Zenodo deposition 21959989, where the bytes are recorded against a published SHA-256. That deposition was **published on 18 August 2026** at DOI 10.5281/zenodo.21959989, which resolves permanently to version 1.0 — the state of the evidence this chapter was written against. The second copy is therefore held by a third party, frozen, and independently retrievable by any reader, who can check its bytes against the SHA-256 printed for each file in Appendix D §D.3.[61] No third party held a copy of any of it before 15 August 2026. The Internet Archive holds none of the GIS artifacts, and on 16 August 2026 it declined to archive tva.com at all.[62]

That is an unusual thing to have to say in a chapter about public disclosure. It follows from the nature of the record. TVA's transmission siting disclosures to landowners are published as web pages and web services under TVA's sole control, revisable without notice, with no docket, no filed version, no certificate of service and no third party holding a copy. There is no proceeding in which any of it becomes part of a record.[63]

That is the condition Chapter 1 describes. Chapter 7 turns to the list the whole catalogue is drawn from.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. Turner, Tommy N. (2026). *TVA Transmission Siting GIS Capture, 15 August 2026* [Data set]. Version 1.0. Zenodo. https://doi.org/10.5281/zenodo.21959989. File `TVA_org_and_NorthGallatin_20260815.json`, SHA-256 `64249836d33ebfbfc24404d4cb3374f851f28656a12669fa96e39a9056428f39`, endpoint `facebook_north_gallatin_service`, query `https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services/Facebook_North_Gallatin_Alternative_Transmission_Line_Route/FeatureServer?f=json`, retrieved 2026-08-15T14:10:59Z. The response carries `serviceItemId: "9e1b4cf2d7534b1e8405ea123c37a5c5"` and a single layer whose `name` is `Facebook_North_Gallatin_Alternative_Transmission_Line_Route`. The organisation identifier `w8auYAijfGK1Mydj` is the path component of every endpoint in the capture and is confirmed as `orgId` on the corresponding ArcGIS Online item record (note 42). **[P]**
2. Ibid.; the service reports `capabilities: "Query"` and was retrieved with no token and no authentication of any kind. Method recorded at `gis_archive_20260815/MANIFEST.txt`: "anonymous ArcGIS REST query, no token, no authentication." The same capture records `allowAnonymousToUpdate` and `allowAnonymousToDelete` as true on this service, which on their own mean nothing because `capabilities` is query-only; the point is developed at `TVA_Org_Enumeration_v0_1.md` and is not a claim of this chapter. **[P]**
3. Ibid., endpoints `facebook_north_gallatin_layer0_meta` (`.../FeatureServer/0?f=json`) and `facebook_north_gallatin_features` (`.../FeatureServer/0/query?where=1%3D1&outFields=*&f=geojson`), both retrieved 2026-08-15T14:10:59Z. The layer returns 16 polyline features. Its field list is exactly two entries: `FID` (`esriFieldTypeOID`) and `Shape__Length` (`esriFieldTypeDouble`). Extent, in the service's Web Mercator projection, is xmin −9623052.04, ymin 4356999.86, xmax −9613663.54, ymax 4362101.33, which falls over north Gallatin, Sumner County. On `Shape__Length` as a planar rather than a ground distance, see Chapter 8 note 10; nothing in this chapter depends on the value. **[P]**
4. Tenn. Valley Auth., *Gallatin, Tennessee (North Gallatin)*, opening purpose paragraph, capture of 16 Aug. 2026, `gis_archive_20260815/TVA_page_capture_north_gallatin_20260816.txt`, deposit 10.5281/zenodo.21959989; original at https://www.tva.com/energy/transmission/transmission-projects/gallatin-tennessee-(north-gallatin). The Internet Archive declined to archive tva.com on 16 Aug. 2026 (note 62), so no contemporaneous third-party capture of this text exists; the Archive's holdings for this page end in April 2025. The identical sentence appears in the April 2025 captures. **[P]**
5. The 302 figure: deposit 10.5281/zenodo.21959989, `TVA_org_and_NorthGallatin_20260815.json`, endpoint

org_service_directory, query https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services?f=json, retrieved 2026-08-15T14:10:59Z; the services array holds 302 entries, 301 FeatureServer and 1 SceneServer. The 764 figure comes from the ArcGIS Online item search https://www.arcgis.com/sharing/rest/search?q=orgid:w8auYAijfGK1Mydj, first recorded at TVA_Org_Enumeration_v0_1.md, 15 Aug. 2026 from the reported total on the first page alone. The search was re-run in full on 26 Aug. 2026 — eight requests at a page size of 100, 764 items returned against 764 reported — and the complete response is captured, hashed and manifested at Appendix D §D.10. It is not in the deposit. **[P]** Note that the item search and the service directory count different things: the search returns 313 items of type Feature Service, because an item can be registered in the organisation without a corresponding entry in the hosting server's directory. The 302 in the text is the service directory. **[P] Open item, Appendix F §F.1.**

6. Estimates, not counts. "Roughly 230" and "about forty" are the working figures recorded at TVA_Org_Enumeration_v0_1.md, 15 Aug. 2026, arrived at by reading the 302 service names; neither is produced by a stated rule, and neither recomputes mechanically from the archived directory, because the boundary of "concerns transmission line siting" and the grouping of names into project families are both judgment calls. The figures are given as approximations in the text and no rule for them is deposited. Chapter 7 note 2 gives the reproducible adjacent figure: 81 distinct PROJECT_NAME values in the register's alternatives layer. **[I] Open item, Appendix F §F.1.**
7. Deposit 10.5281/zenodo.21959989, org_service_directory as at note 5. The response returns a flat services array with no folders member populated, and the entire catalogue is returned by the single unauthenticated request cited. **[P]**
8. Counted mechanically over the 302 archived service names, services whose name contains "parcel" number **29**; services whose name contains a ROW token or "Right_of_Way" number **30**. Both figures are from org_service_directory, note 5. The "approximately one per siting project" gloss survives on the parcel figure only if the project count is nearer thirty than fifty, which is itself unestablished (note 6). **[P] Open item, Appendix F §F.1.**
9. Deposit 10.5281/zenodo.21959989, org_service_directory, note 5. The nine Riceville services are returned verbatim as listed. **[P]**
10. Ibid. Each vocabulary item in the list appears as a name component on at least one archived service. **[P]**
11. Ibid.: Riceville_*, Tiny_Town_Road_*, Sundown_Drive_*, Jones_Chapel_*, Harding_Springs_Gladstone_*, Florence_Iron_City_*, North_Oakland_Coffeeville_*, South_Macon_to_DeKalb_*, West_Lexington_Jacks_Creek_*. The en dashes in the text render underscores in the service names. **[P]**
12. Ibid. Seven services, returned verbatim as listed, including TVA's own misspellings Clircuit and Fiberson. Note that Fiberon appears in the service directory but **not** in the TSSProjects_Hosted register: no record in the archived alternatives layer carries PROJECT_NAME containing "Fiberon" and no record in the centerline layer

carries such a NAME. The project is in the catalogue of published layers and absent from the register the rest of this volume computes from, which is a limit on any cross-check between the two. **[P]**

13. **Sourced 17 Aug 2026.** The TVA page describes only "a manufacturing and distribution facility" and does not say what it manufactures; the line of business, the corporate parent and the Columbia plant are established elsewhere. Tenn. Dep't of Econ. & Cmty. Dev., *Governor Lee, Commissioner Rolfe Announce Fiberon to Establish Operations in Maury County*, 26 Jan. 2022, https://www.tn.gov/ecd/news/2022/1/26/governor-lee–commissioner-rolfe-announce-fiberon-to-establish-operations-in-maury-county.html: subhead "Composite decking, railing and cladding company to create 310 new jobs in Columbia"; body "Founded in North Carolina in 1997, Fiberon is a leading U.S. manufacturer of wood-alternative decking, railing and cladding" and "Fiberon, a subsidiary of Fortune Brands Home & Security, Inc." The same release quotes Brett Finley as "president, Fortune Brands Outdoors & Security," names TVA and Columbia Power and Water Systems among the recruiting partners, and gives a Fortune Brands media contact at an @FBHS.com address. Corroborated by the company's own announcement: Fiberon, *Fiberon Breaks Ground on 500,000 Square-foot Manufacturing Facility in Columbia, Tennessee*, Business Wire, 11 May 2022 — groundbreaking 10 May 2022, at least 500,000 square feet on a 130-acre site, "Fiberon's new plant in Columbia will manufacture polyethylene (PE) decking and composite cladding," production scheduled to begin late 2024, and "Fiberon is part of the Outdoors & Security division of Fortune Brands Home & Security, Inc. (NYSE: FBHS)." Two qualifications. The parent is named as of 2022; the company now trades as **Fortune Brands Innovations, Inc. (NYSE: FBIN)** and announced a strategic review of the Fiberon business in May 2026, so the ownership stated here is the ownership of the siting period and not of today. And Fiberon's principal product is a wood-plastic composite; "composite decking manufacturer" is accurate but incomplete, since railing and cladding are in the same line and the Columbia plant makes cladding as well as decking. **[P]**
14. Tenn. Valley Auth., *Columbia, Tennessee (Fiberon)*, capture of 16 Aug. 2026, gis_archive_20260815/TVA_page_capture_columbia_fiberon_20260816.txt , deposit 10.5281/zenodo.21959989: "the Columbia area of Maury County in Tennessee." **[P]**
15. See notes 1–3. **[P]**
16. Deposit 10.5281/zenodo.21959989, file TVA_TSSProjects_L0_centerline_20260815.geojson, SHA-256 2898370e8f998270834517dab9927ede84ad0bee7f8a3b89f89c83ca1af6fd0a, query https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services/TSSProjects_Hosted/FeatureServer/0/query?where=1=1&outFields=*&f=geojson, retrieved 2026-08-15T14:10:59Z. NAME = "Ultium - Night Sky", PROJECT_ID = 539168, WORKORDER = 2T0KV1, SITING_ENGINEER = "Whittier", STATUS = "Active", MILES = 1.12020288, appearing on three duplicate records (OBJECTID 7919, 12491, 12951) that share geometry and

attributes. On the duplication, see Chapter 8 §8.2. The name has no record in the alternatives layer and no service of its own in the org directory. **[P]**

17. Ultium Cells LLC as the General Motors and LG Energy Solution joint venture, and the Spring Hill plant's location, are established in U.S. Dep't of Energy, Loan Programs Office, *Environmental Assessment: Spring Hill, TN Battery Cell Manufacturing Plant; Lordstown, OH Battery Cell Manufacturing Plant*, DOE/EA-2189 (Aug. 2022), relied on at Chapter 11. **The three "Project Night Sky" uses are now all sourced, from the same document, 17 Aug 2026.** DOE/EA-2189 cites at printed p. 22 both (a) Tenn. Dep't of Transp., *Transportation Impact Analysis for the S.I.A Road Service Project Night Sky*, Strategic Transportation Investments Division, 2 June 2021, and (b) General Motors, LLC, *Traffic Impact Analysis: Project Night Sky, Spring Hill, Tennessee*, prepared by Gresham Smith, Nov. 2021. Its Appendix B lists, among the documents DOE reviewed for Section 106, *Architectural Survey Report: Project Night Sky, City of Spring Hill, Maury County, Tennessee*, dated 21 June 2021, and *Phase I Archaeological Report for Project Night Sky, Maury County, Tennessee*, dated June 2021, with Addenda I–III. The sentence in the text therefore does not need narrowing: the traffic study, the state transportation impact analysis and the archaeological survey each carry the name, and all three predate TVA's 2022 correspondence and its register entry. **[P]**
18. Deposit 10.5281/zenodo.21959989, layer 0 as at note 16 and layer 5 as at note 33: `Memphis Regional Megasite`, `PROJECT_ID` 410316, `WORKORDER` 31AS9, `MILES` 6.465, with `EDIT_DATE` 19 Oct. 2014 on the centerline record and 7 Apr. 2014 on the alternatives records. **The "in service since October 2015" date is not supported by anything located.** No `INSERVICE_DATE`, page, or press item in the project files gives October 2015. No source for it is identified anywhere in this volume's files, and the volume does not assert it. **[P for the register record; unsourced for October 2015] Open item, Appendix F §F.1.**
19. Deposit 10.5281/zenodo.21959989, `org_service_directory`, note 5: thirteen `Transpark_East_*` services, returned verbatim, including the three quoted. The register carries the project as `New Transpark East, Ky` in the alternatives layer. That the name refers to the Kentucky Transpark, an economic development megasite outside Bowling Green, is a characterisation for which no source is identified in this volume's files. **[P for the service names; unsourced for the identification of the site] Open item, Appendix F §F.1.**
20. Deposit 10.5281/zenodo.21959989, `org_service_directory`, note 5: `Cates_Landing_Alternate_Route`, `Cates_Landing_Substations`, `Cates_Landing_Tax_Parcels`, `Cates_Landing_Transmission_Lines`. Register name `Cates Landing, TN` in both layers. The destination is identified on TVA's own page as "the Lake County Industrial Park on Cates Landing Road North in Tiptonville": Appendix A, entry 4. **[P]**
21. Deposit 10.5281/zenodo.21959989, layer 0 as at note 16: `NAME` values `Moore County Solar`, `Millington - Solar, TN`, `Magnolia Solar`. These three are register entries, not service families; none has a matching service in the org directory. **[P]**
22. Ibid. and `org_service_directory`, note 5: register `NAME` `Redstone Arsenal No. 3, AL` in both layers, plus the service `Redstone_Arsenal_3_Interactive_Webmap`. **[P]**

23. Deposit 10.5281/zenodo.21959989, `org_service_directory`, note 5: `Commerce_Park_2_Alternative_Substation_Loop`, `Commerce_Park_2_Alternative_Transmission_Line_Routes`, `Commerce_Park_2_Substation`, `Commerce_Park_II_Tax_Parcels`; register `PROJECT_NAME` `Commerce Park 2`. **[P]**
24. Ibid. for the three service names, returned verbatim. Sequachee Valley Electric Cooperative as the Lewis Chapel counterparty is on TVA's own page: Appendix A, entry 10 ("SVEC's service territory"). The expansions of `LCUB` to Lenoir City Utilities Board and `BTES` to Bristol Tennessee Essential Services are not carried by any document in the project files; both are the conventional expansions and are given here as such. **[P for the service names and SVEC; unsourced for the two expansions] Open item, Appendix F §F.1.**
25. Deposit 10.5281/zenodo.21959989, layer 5 (note 33) and layer 0 (note 16): populated `EDIT_DATE` values on customer-named projects run from 7 Apr. 2014 (Memphis Regional Megasite) forward, and the North Gallatin service item was created 23 Dec. 2020 (note 37). "A decade" is a fair reading of that span. That the naming is done by "TVA's siting engineers" specifically rests on the register's `SITING_ENGINEER` field, which carries named TVA employees; see Chapter 10. **[P for the span; I for the attribution to siting engineers]**
26. County and voltage: Fiberon from the page capture at note 14 ("161-kilovolt substation," Maury County); North Gallatin from the page capture at note 4 ("North Gallatin 161-kilovolt Substation," Sumner County). GIS naming from notes 1 and 12. Public-page naming from Appendix A §A.2, counts 1–3. **[P]**
27. Page capture at note 14, title line and body, quoted verbatim. The page names Fiberon in its `<title>`, in its `meta-og:title`, in its heading and twice in the body. Appendix A §A.2 count 1 records it as the only one of the eighteen naming an end-use customer. **[P]**
28. See note 4. **[P]**
29. Page capture at note 14 and the capture notes filed with it: no Map section, no webmap identifier, no schedule table, no Public Involvement section, no mileage, no owner or parcel count. Coded across all eighteen pages at Appendix A: eight pages carry the owner/parcel sentence, five give an existing-versus-new right-of-way split, and every page but this one carries a Map section. "Every other page has most of these" is the coder's summary of Appendix A §§A.1–A.4 and the deposited field detail rather than a single tabulated count. **[P for the Fiberon absences; S for the comparison]**
30. Both readings are the author's, and the chapter says so. **[I]**
31. Inference from the artifact. Nothing in the capture states who created the layer or what they knew; what is established is that a layer bearing the customer's name was created inside TVA's siting organisation and published. **[I]**
32. The Facebook-named service item was created 23 Dec. 2020 (note 37); the Fiberon page carries a single update stamp of **July 2023** (page capture, note 14, and the deposited field detail at Appendix A §A.5), which is thirty-one months later, and the North Gallatin page went live 21 Jan. 2021, thirty months before it. No creation date is available for the Fiberon services themselves — the ArcGIS service directory does not

carry one and the Fiberon items were not captured — so the interval is measured page to page and service to page, and cannot at present be measured service to service. **[P]** **Open item, Appendix F §F.1.**

33. Notes 12 (seven Fiberon services), 19 (thirteen Transpark East services) and 20 (four Cates Landing services). Layer 5 references throughout this chapter are to deposit 10.5281/zenodo.21959989, files `TVA_TSSProjects_L5_alternatives_p1_20260815.geojson`, SHA-256 `d9680cf1121d1a29ef058645d566b67e7adec8e08042dea4b6b3a98f0a6c59d4`, and `TVA_TSSProjects_L5_alternatives_p2_20260815.geojson`, SHA-256 `51837a7828255e6da505ecfa073285da940664602c0a3f21c3f8c2912d1b1393`, queries `.../TSSProjects_Hosted/FeatureServer/5/query?where=1=1&outFields=*&f=geojson&resultRecordCount=2000&resultOffset=0` and the same with `resultOffset=2000`, retrieved 2026-08-15T14:10:59Z. **[P]**
34. Tenn. Dep't of Econ. & Cmty. Dev., release of 12 Aug. 2020; Meta Data Centers, "Hello, Gallatin!," 12 Aug. 2020. Both are in the volume's source register at Chapter 10 and are cited there in full. **[S]**
35. TNECD release, 12 Aug. 2020: the announcement credits "a three-year recruitment effort by the Gallatin Economic Development Agency, the Tennessee Department of Economic and Community Development and Tennessee Valley Authority." Quoted from the release as recorded at `TVA_Sumner_Gallatin_Meta_v0_1.md`, 15 Aug. 2026; the release itself is cited at Chapter 10. **[P]**
36. **Sourced 17 Aug 2026, and the date is now exact.** Meta Platforms, Inc., Current Report on Form 8-K, filed 28 Oct. 2021, Item 5.03, https://www.sec.gov/Archives/edgar/data/1326801/000132680121000071/fb-20211028.htm: "On October 28, 2021, Facebook, Inc. (the 'Company') changed its corporate name to Meta Platforms, Inc., pursuant to an amended and restated certificate of incorporation filed with the Delaware Secretary of State on October 28, 2021." The cover page of the same filing carries "Facebook, Inc." as "Former name or former address, if changed since last report" and is signed "META PLATFORMS, INC." **The corporate name change and the ticker change are separate events and the chapter means the first.** The 8-K states that the Company then intended its Class A shares to cease trading as "FB" and begin trading as "MVRS" effective 1 Dec. 2021; that plan was abandoned, and the ticker in fact changed from FB to **META** before market open on 9 June 2022 (Meta Platforms, Inc., *Meta Platforms, Inc. to Change Ticker Symbol to "META" on June 9*, 31 May 2022). The cover page of the October 2021 8-K still lists the trading symbol as FB, which is the cleanest single demonstration that the two events are distinct. Nothing in this chapter turns on the ticker; the point at §6.6 is only that the corporate name in use when the service was created on 23 Dec. 2020 was Facebook, and that it had changed by the time the file was found. **[P]**
37. Deposit 10.5281/zenodo.21959989, file `TVA_AGOL_items_20260815.json`, endpoint `facebook_service_item_meta`, query `https://www.arcgis.com/sharing/rest/content/items/9e1b4cf2d7534b1e8405ea123c37a5c5?f=json`, `retrieved_utc` 2026-08-16T00:22:31Z: `created` 1608749697000 = 2020-12-23T18:54:57Z, `owner` `TVA-GIS`, `orgId` `w8auYAijfGK1Mydj`, `access` `public`. TVA announced the project and opened the

virtual open house on 21 Jan. 2021: page capture at note 4, schedule table, “Virtual Open House begins … January 21, 2021.” The interval is twenty-nine days. **[P]**

38. Inference. TVA has not said when or why the name was chosen. **[I]**
39. Deposit 10.5281/zenodo.21959989, `TVA_AGOL_items_20260815.json`, endpoint `ng_openhouse_webmap_item_meta`, query `https://www.arcgis.com/sharing/rest/content/items/da8380d3b792460fb666310e3e5d22ab?f=json`: `title` “North Gallatin, TN Virtual Open House”, `owner` `TVA-GIS`, `access` `public`, `type` `Web Map`, `snippet` “North Gallatin Virtual Open House”, `numViews` 843. The map embedded in the current North Gallatin page is item `28acc6d2537f4ce2b77f9e8a317e3727`, `TVA.COM_Gallatin`, owner `nrcobb@tva.gov_tva`, created 13 Jun. 2025 — four and a half years after the open house map, and after the line was in service. The tagged map is the virtual open house map, which is the artifact a property owner used during the January–February 2021 comment period. Whether item `da8380d3…` was the embed on the 2021 version of the page is **not established**: no capture of the page’s embed target from that period was located. **[P for the item record; P, negative for the embed question] Open item, Appendix F §F.1.**
40. The tag as returned: `tags: ["siting", "Facebook North Gallatin Virtual Open House"]`, ibid. That the map was what a Sumner County property owner opened follows from the page’s own direction to the virtual open house between 21 Jan. and 22 Feb. 2021 (page capture, note 4) and from the item’s title, snippet and 843 recorded views; it is not established by a server log and no per-visitor evidence exists. **[P for the tag; I for the use] Open item, Appendix F §F.1.**
41. Ibid.: `created` 1608751702000 = 2020-12-23T19:28:22Z, `modified` 1753890645000 = 2025-07-30T15:50:45Z. The 30 July 2025 timestamp should not be read as project activity: `TVA_Org_Enumeration_v0_1.md` records a bulk re-save on that date touching eighteen legacy open-house maps, `TSSProjects_Hosted` and `GeneSIS_Layers` together. **[P]**
42. The two-level naming, visible on the face of two records. The ArcGIS Online **item** for the feature service carries `title: "North Gallatin Alternative Transmission Line Route"` — the customer’s name removed — while the same item’s `url` field points at `https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services/Facebook_North_Gallatin_Alternative_Transmission_Line_Route/FeatureServer` and the service and its single layer both report `name: "Facebook_North_Gallatin_Alternative_Transmission_Line_Route"`. Item record at note 37; service and layer records at notes 1 and 3. The web map item’s display title is likewise “North Gallatin, TN Virtual Open House” while its tag is `Facebook North Gallatin Virtual Open House` (notes 39–40). The word “sanitised” describes the resulting state of the records; **no evidence establishes that anyone edited a title that had previously read otherwise**, and the chapter does not claim it. **[P for the two-level naming; I for characterising it as sanitisation]**
43. Both items are owned by `TVA-GIS` in org `w8auYAijfGK1Mydj` and were created on 23 Dec. 2020, thirty-three minutes apart: 18:54:57Z and 19:28:22Z. Notes 37 and 41. **[P]**

44. **The negative finding, and the search that establishes it.** Internet Archive CDX queries of the form `http://web.archive.org/cdx/search/cdx?url=<url>&output=json&collapse=digest`, run 15 Aug. 2026 against the two Sumner County project page URLs, returned sixteen captures of `tva.com/energy/transmission/transmission-projects/gallatin-tennessee-(north-gallatin)` dated March 2021 to April 2025, collapsing on content digest to three distinct body texts, and six captures of the 109 North page collapsing to two. Each distinct text was retrieved and searched for the case-insensitive terms *Facebook*, *Meta*, *data center*, *data centre*, *hyperscale* and the names of the major hyperscale operators. Zero occurrences in any body text. Recorded at the working notes for this chapter, which are not published, 15 Aug. 2026, and at Chapter 10 note 21. **The CDX responses and the retrieved texts are not in the deposit**; the search is reproducible from the query form and date range given. **[P, negative] Open item, Appendix F §F.1.**
45. Ibid. The four differences named are the whole of the variation between the three distinct North Gallatin texts. **[P]**
46. Page capture at note 4: the January 2021 text appears verbatim under the "Background" heading in the 16 Aug. 2026 capture, including the sentence directing readers to a virtual open house that closed 22 Feb. 2021. **[P]**
47. Notes 44–46 for the page; notes 37, 41 and 43 for the catalogue. One qualification belongs on the face of the claim: continuity of the service name from December 2020 to August 2026 is established by the item's creation date and by its presence at capture, **not** by continuous observation. Nobody watched the catalogue in between, and the ArcGIS item record does not expose a name history. **[P, negative]**
48. Thirty-eight archived versions of the four associated TVA press releases and five captures of the virtual open house splash page, searched on the same terms as note 44 with zero occurrences. Recorded at the working notes for this chapter, which are not published, 15 Aug. 2026. The four release URLs are not enumerated anywhere in this volume and the CDX output is not deposited. This is the sentence that generalises the negative beyond the project page, and both gaps are open items. **[P, negative] Open item, Appendix F §F.1.**
49. Ibid. The North Gallatin page's stated open house start is 21 Jan. 2021 (page capture, note 4); the earliest Internet Archive capture returned by the CDX query at note 44 is 2 Mar. 2021. Six weeks unarchived. **[P, negative]**
50. For the register record, note 16. For the absence of a project page: the eighteen-page Tennessee census at Appendix A contains no Ultium entry, and TVA's project index does not list one. For the absence of a TVA environmental document: no TVA NEPA record naming the line was located by the searches described at Chapter 11. As with every negative in this volume, the strength of the claim is the strength of the search. TVA's published lists of completed categorical exclusion checklists locate CEC 47184 at note 64. The negative is narrower accordingly: no TVA environmental *document* names the line. A determination does, and TVA publishes the fact of it and not the document. **[P, negative, as narrowed]**
51. U.S. Dep't of Energy, Loan Programs Office, *Environmental Assessment: Spring Hill, TN Battery Cell Manufacturing Plant; Lordstown, OH Battery Cell Manufacturing Plant*,

DOE/EA-2189 (Aug. 2022), Appendix B (Consultation with Agencies, Indian Tribes, and Interested Parties), at PDF p. 96 of 182: Tennessee Historical Commission, State Historic Preservation Office, to Todd Stribley, Department of Energy, letter dated 8 July 2022 and transmitted by email 27 July 2022, project no. SHPO0001127. Quoted verbatim including the Commission's capitalisation of "161-Kv." TVA's letter of 26 July 2022 is not a reply to the Commission: it is addressed to Todd Stribley at DOE's Loan Programs Office, responds to DOE's letter of 7 June 2022, and copies Casey Lee at the Commission. See Chapter 11 note 7. **[P]**

52. The 1.1 miles is TVA's own `MILES` value of 1.12020288 on the register record at note 16. The thirteen-acre utility corridor and its position on the southwestern side of the plant site are from the DOE environmental assessment at note 51, as relied on at Chapter 11. **[P]**
53. Columbia Power and Water Systems is named as the distributor on the Fiberon page (capture at note 14: "Columbia Power and Water Systems (CPWS) will build a 161-kilovolt substation at the Fiberon facility") and serves the Spring Hill plant site per the DOE assessment at note 51. Both projects are 161 kV: page capture at note 14 and register `KV` values at note 33. **[P]**
54. Inference from the documentary record: the fullest public description of the line is an inter-agency Section 106 exchange printed as an appendix to a federal loan document. TVA's own published record of the line is the centerline in its register and the title of CEC 47184, neither of which describes the project. Why the description appears in another agency's appendix and in no TVA document is the author's reading. **[I]**
55. Appendix A, *The Tennessee Project Census, Coded*, §A.2 counts 1–3 and §A.3, from the eighteen project pages as retrieved 16 Aug. 2026. Sixteen of eighteen name neither an end-use customer nor a counterparty. Counted over the verbatim purpose blocks reproduced at Appendix A §A.3, **fourteen** of the sixteen carry the formula word for word, and the remaining two are variants of the same sentence rather than different sentences: North Dayton reads "provide for growing electrical load and increase power reliability," and Tiny Town Road inverts the clause order to "increase power reliability and provide power for growing load." So all sixteen are near-identical and fourteen are verbatim. Appendix A also records the coding decision that produces 16 rather than 15 — North Dayton names Nokian Tyres only as land crossed — and that decision should be quoted wherever the figure is used. **[P]**
56. Appendix A §A.2 count 1, and the page capture at note 14. **[P]**
57. Appendix A §A.2 count 2 and §A.3 entry 15: "TVA is considering improvements to its transmission system that would increase the transmission import capacity with Associated Electric Cooperative, Inc. (AECI), in the Tiptonville area in Lake County." AECI is a utility across the Mississippi River, not an end-use load. **[P]**
58. Within the eighteen-page census, TVA's own files name the customer for **two**: North Gallatin (notes 1–3) and Fiberon (note 12). Ultium – Night Sky (note 16) and Memphis Regional Megasite (note 18) are named in the register and have no page in the census at all, a point made at §6.7. **[P]**
59. The renaming estimate is the author's, from the ArcGIS Online administrative interface's ordinary behaviour. No TVA statement addresses it. **[I]**

60. `gis_archive_20260815/MANIFEST.txt`: fifteen files, 3,385 features, byte count, feature count, SHA-256 and source URL per file, host clock 2026-08-15T14:10:59Z. The manifest also records that the files were first written with a 20260813 datestamp from a sandbox clock two days slow, and that folder and filenames were corrected to 20260815 without change to content. Appendix D reproduces it. `TVA_AGOL_items_20260815.json` (note 37) and the `page_captures_20260816/` directory (notes 4 and 14) are manifested. As verified on 17 Aug. 2026 the manifest enumerated **40 files, 3,222,535 bytes**, and disk, `MANIFEST.txt` and Appendix D §D.3 were confirmed to agree on every SHA-256 and every byte count, with zero discrepancies, by an independent replication test. **The deposit as published on 18 Aug. 2026 holds 58 files, 3,416,780 bytes**, the addition being the Dominion Energy Virginia control set; Appendix D §D.2 describes it. **[P]**
61. Deposit 10.5281/zenodo.21959989, version 1.0, and `MANIFEST.txt` as at note 60. The GIS artifacts on which §§6.1 and 6.6.1 rest are held in `TVA_org_and_NorthGallatin_20260815.json` (note 1) and `TVA_AGOL_items_20260815.json` (note 37). **[P]**
62. `gis_archive_20260815/TVA_page_captures_README_20260816.md`: the Internet Archive declined to archive tva.com on 16 Aug. 2026, returning "We're currently facing some limitations when it comes to archiving this site." The same file records that every TVA transmission project page examined carries `meta-robots: noindex` and a `canonical` tag pointing at the parent index rather than at itself, confirmed on three pages. Whether that configuration is deliberate is **not established** and this volume does not assert it; whether it explains the Archive's refusal is likewise unverified. No Internet Archive capture of any TVA GIS service or ArcGIS Online item was located. **[P, negative] Open item, Appendix F §F.1.**
63. Chapter 1 and its notes establish the absence of a certificate proceeding, a docket, a filed tariff and judicial review. **[P]**
64. CEC 47184, "Project Night Sky - TVA Ultium, TN 161kV Switching Station and Loop Line," Maury County, Tennessee, business unit Electric System Projects, date closed 8/11/2022, CE applied 16, in TVA's list of completed categorical exclusion checklists for FY2022. TVA, *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, eight documents covering 27 Apr. 2020 – 31 Mar. 2026, 11,899 records, retrieved 17 Aug. 2026; retrieval route, the Cloudflare and truncation cautions, and the independent re-derivation are at Chapter 3 note 5, and the per-project table at `TVA_CE_Determination_Research_v0_1.md`. The title is quoted verbatim, including TVA's spacing and its rendering of the voltage as "161kV." **[P]**
65. That the title carries the customer's project name is a comparison of the row at note 64 against the register value `Ultium - Night Sky` at note 16 and the General Motors documents of 2021 at Chapter 11 notes 13–14. That TVA publishes the register and not the checklists, that the lists carry no extraordinary-circumstances column and name no approving official, is established at Chapter 3 §3.3 and notes 10–11. **[P for the row and the register value; I for the reading that the two labels are the same convention]**

Chapter 7 — The Register and the Queue

Computed from the archived register, deposit 10.5281/zenodo.21959989.

7.1 Two lists

The register in this chapter is not the exclusion register of Chapter 3. It is TVA's project register, the GIS layers its siting engineers draw on, and it answers a different question: not what review a line received, but which lines exist at all.

TVA publishes forty transmission projects.[1]

TVA's route alternatives layer carries **81 distinct project names**. Its selected centerline layer carries **69**.[2]

The gap is the subject of this chapter, and the first thing to say about it is that the obvious reading is wrong.

7.2 The falsification test

The tempting claim is that TVA's internal register holds roughly twice as many siting projects as it publishes pages for. It does not survive contact with the data.

The status field decides nothing. `STATUS` holds three values across all 2,645 records: null on 30 project names, a single space on 4, and "Active" on 47. There is no Complete, Archived, Inactive or Cancelled value anywhere in the layer. Published projects appear in all three groups — 109 North and Waldens Creek are null, Commerce Park 2 is a blank space, North Gallatin is Active.[3] The field is orthogonal to both publication and lifecycle.

The in-service date decides it. Forty of the 81 names carry an `INSERVICE_DATE`. Every one falls between 1 June 2014 and 1 March 2023. Not one is in the future.[4] The field records completion, not schedule, which makes it a clean built/unbuilt flag.

Thirty-six of those forty have no public page. Those are finished lines whose project pages were retired. That is ordinary housekeeping and evidence of nothing.

So most of the register is history. The gap is not forty-one unpublished projects.

7.3 What survives, and the field that made the first count wrong

The residue has to be computed on the project identifier, not on the project name.

TVA truncates the name. Layer 0's `NAME` field has a fifty-character ceiling. Exactly one project hits it, and it is the one this volume cares most about:[5]

```
layer 5   Middle Tennessee Generation & Transmission Capacity
Expansion   (61 chars)
layer 0   Middle TN Generation & Transmission Capacity Expan
(50, cut mid-word)
```

Matched on name, that project appears to have alternatives and no selected route. Matched on identifier — 543225 in both layers — it has fifty-seven studied segments **and twenty-two selected centerline records**. Scenic Drive, Georgia fails the same way in the opposite direction: matched on name it appears centerline-only, and identifier 436713 carries eight alternative segments. Harding Springs–Gladstone was listed twice, once under each of its two names, and is a single project, 533773.[6]

Nothing in the layer announces the truncation. A researcher joining these two layers by name will silently mis-sort every project with a long name, and will not be told.

Computed on identifier, deduplicated, null keys excluded:[7]

	Projects
Present in both layers	**46**
Alternatives only — drawn, no route selected	**33**
Selected centerline only — no alternatives record	**21**
Distinct identifiers	**100**

The thirty-three with alternatives and no selected route are the ones a landowner would want to know about, because they are the projects where a corridor has been drawn across identifiable property and nothing has been settled. They include Roane County, West Lexington–Jacks Creek, South Macon–DeKalb, Charity Lane, Commerce Park 2, 109 North, and Project CINCO Phase I.[8]

Against those, the in-service test from §7.2 removes the built work. **The defensible residue is roughly eighteen projects that appear to be in siting rather than built, against forty published.**[9] That is a real finding at a fraction of the size the first reading suggested, and this volume states the smaller number.

Middle Tennessee Generation & Transmission Capacity Expansion is not an unpublished project. It has a public page; what it lacks is a listing on TVA's *index* of current projects, which is the narrower claim Chapters 4, 8 and 12 make.[10]

7.4 Project identifiers are not a key

Both layers carry `PROJECT_ID`. It is a hand-maintained free-text field and it does not join across layers.

Project	Alternatives layer	Centerline layer
North Gallatin	439098	533421
Artesia, MS	425127	431686
Midway–South Macon	425126	528640
RailHub Phase 1	555085_	555085
Lewis Chapel Delivery Point	536149	53649-2T0FP

Trailing underscores, a hyphenated work-order format, and a `TPS`-prefixed value on Roane County.[11] Seventy-nine distinct identifiers in one layer, 67 in the other, 46 shared.

The crosswalk in Appendix B therefore joins on published-page label where one exists, then on identifier, then on normalised name. It corroborates the name mapping and does not replace it. Every count in this chapter carries that caveat.[12]

It does resolve individual cases. “Fall Creek Falls” and “Fall Creek, TN 161kV Delivery Point” both carry 549609, as does the centerline layer’s “Fall Creek, TN Preferred Route” — one project, matching a published page. “Walden Creek” and “Waldens Creek” both carry 553928. “109 North, TN” and “109 North TN 161kV Delivery Point” both carry 631204. The centerline record of the same name carries no identifier at all, which is the null behind the spurious 7.08 ratio at Chapter 8 §8.5A.

Work order numbers are a better key. `WORKORDER` confirms the same pairings independently: Fall Creek Falls and Fall Creek Delivery Point share `2T14S`; the two 109 North records share `2T17U`; Walden and Waldens Creek share `2T1FD`.[13] One record has a project identifier typed into the work order field.[14]

7.5 Identifier blocks give a rough chronology

Correlating identifiers against in-service dates across the forty dated records: the 1xxxxx–2xxxxx block completes 2014–2015, the 4xxxxx block spans 2014–2023, and nothing in the 53xxxx block or higher carries a completion date at all.[15] Identifiers appear to be issued at project initiation.

On that reading — an inference from correlation, not a documented scheme — the unpublished set splits.[16]

Recent block, no public page:

ID	Project	Location
533772 / 533773	Harding Springs–Gladstone	AL
535582	Moore County Solar	Moore County, TN
539168	**Ultium – Night Sky**	Spring Hill, Maury County, TN
543225	**Middle Tennessee G&T**	Cheatham / Robertson / Davidson, TN
546255	Hickory Grove	KY
547555	Magnolia Solar	Clay County, MS
547560	Carbondale Park	GA
631350	**Project CINCO Phase I**	Lowndes County, MS

Older block, no public page: Guthrie KY 418551 · Oxford–Coffeeville MS 422578 · Flowood MS 429122 · Scenic Drive GA 436713 · Trade AL 438921 · Stateline Road MS 440387 · Alcoa–Nixon Rd 443430 · Roane County TN `TPS212623`.

Project CINCO sits in the newest block, alongside Appalachia (629986), Commerce Park 2 (630471), the 109 North delivery point (631204) and Belmont Stage 2 (631231).[17] Three of those four have public pages.

7.6 It is a queue, not a vault

The unpublished set is not concealed. It is early.

Hickory Grove, Kentucky was on the unpublished list when this research began. On 3 August 2026 TVA published a project web map for it, tagged `TSSProjects`.[18] Twelve days later it had 25 views.

Roane County, Tennessee — also on the unpublished list — had eleven items created across 24 and 25 June 2026: an interactive map, an existing-system layer, a land-use map, two comment forms with their backing services, and a `TVA.COM_RoaneCounty` web map.[19] A complete project package assembled in about thirty-six hours.

That matters for how the finding should be read. A project appearing in TVA's engineering register before it appears on TVA's website is not evidence of concealment. It is evidence that the register runs ahead of the website, which is what a register is for.

What the register does establish is different and narrower. It shows **which projects exist**, **how long they have existed**, and **what TVA calls them** — and that last item is Chapter 6's subject.

7.7 Two published pages with no register record

Beulah Grove, Mississippi and **Columbia (Fiberon), Tennessee** appear on TVA's project list and in neither GIS layer.[20]

Fiberon is worth the note. It is the only Tennessee page naming an end-use customer, the only one with no Map section, and the only one absent from both layers. Two absences are not a pattern and this volume draws no conclusion from it.

7.8 What should be requested

Everything in this chapter is reconstructed from geometry because the underlying list is not published. The list exists — the GIS is drawn from it — and it is the single most valuable record a researcher could obtain from TVA.

The companion guide, request T1, sets out the language.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. TVA project index, retrieved 16 Aug 2026. **[P]**
2. Distinct non-null `PROJECT_NAME` (layer 5) and `NAME` (layer 0), `returnDistinctValues` count queries, retrieved 15 Aug 2026; deposit 10.5281/zenodo.21959989. **[P]**
3. Distinct `(STATUS, PROJECT_NAME)` query across 2,645 records. **[P]**
4. Distinct `(PROJECT_NAME, INSERVICE_DATE)` query; epoch values converted UTC. **[P]**
5. Field length comparison across both layers, deposit 10.5281/zenodo.21959989, files `TVA_TSSProjects_L0_centerline_20260815.geojson` and `TVA_TSSProjects_L5_alternatives_p*_20260815.geojson`. Layer 0's `NAME` values reach a maximum of 50 characters and exactly one project name attains it, in 22 records; layer 5's `PROJECT_NAME` runs to 81. Three layer-5 names exceed 50 characters: Middle Tennessee G&T (61), North Oakland–Coffeeville (63) and Project CINCO Phase I (81). Only the first has a counterpart in layer 0, which is why only it demonstrates the truncation. **[P]**
6. Identifier lookups on the archived layers: 543225 returns 57 alternative segments and 22 centerline records; 436713 returns 8 and 4; 533773 returns records under both "Harding Springs - Gladstone" and "Gladstone, AL." Code at Appendix C. **[P]**
7. Grouping both deduplicated layers by `PROJECT_ID` with null keys excluded, per Appendix C §C.5. 100 distinct identifiers; 46 in both layers, 33 in the alternatives layer only, 21 in the centerline layer only. Full table at Appendix B §B.3. **[P]**
8. The 33, listed in full at Appendix B §B.3 under status "studied only." **[P]**

9. The in-service test at §7.2 applied to the 33, plus the two projects on TVA's index absent from both layers at note 20. The residue is stated as "roughly" because the identifier field is hand-maintained and the join is a floor rather than a census; see §7.4. **[P for the counts; I for the residue]**
10. TVA, *Middle Tennessee Generation and Transmission Capacity Expansion Project*, capture 16 Aug. 2026, `TVA_page_capture_middle_tennessee_gt_20260816.txt`, deposit 10.5281/zenodo.21959989. The page exists and is not linked from TVA's project index; the URL-path evidence is at Chapter 4 §4.6 and its note 25. **[P]**
11. Distinct `(PROJECT_NAME, PROJECT_ID)` queries on both layers. **[P]**
12. Method stated in Appendix C. **[P]**
13. Distinct `(WORKORDER, PROJECT_NAME)` query, layer 5. **[P]**
14. Middle Tennessee G&T carries `543225` in `WORKORDER`, matching its own `PROJECT_ID`. **[P]**
15. Correlation across the forty dated records. **[P]**
16. **[I]** — inference from correlation. TVA publishes no identifier scheme.
17. Identifier comparison, crosswalk. **[P]**
18. ArcGIS Online item `TVA.com_HickoryGrove`, created 3 Aug 2026, captured 15 Aug 2026 in `TVA_AGOL_items_20260815.json`. **[P]**
19. ArcGIS Online item search, TVA organisation, June 2026 creation dates. **[P]**
20. Crosswalk, Appendix B. **[P]**

PART III — MEASURING THE BURDEN

Chapter 8 — Corridor Measurement

All figures computed from `gis_archive_20260815/`, captured 15 August 2026. Method and code in Appendix C.

8.1 What Virginia cost, and what Tennessee gives away

The Virginia volume measured transmission corridor burden the hard way. Route alternatives were published as PDF maps. Establishing how much corridor a project studied, and how much it selected, meant georeferencing raster images against parcel data.[1] The corridor image library for that work runs to 916 megabytes.[2]

Tennessee requires none of it. TVA publishes route geometry as a queryable feature service, and publishes segment length as a field on every record.[3] The quantity Virginia had to reconstruct, Tennessee states.

This chapter measures TVA's transmission corridor burden across its whole seven-state portfolio. No prior measurement of it was located.[4] The arithmetic is simple. Getting it right is not, for one reason that has to be dealt with first.

8.2 Nearly half the register is duplicated

TVA's alternatives layer returns **2,645 records**.[5] It does not contain 2,645 distinct route segments.

Segments appear more than once, with different object identifiers and different globally unique identifiers, but byte-identical geometry and identical attributes.[6] The North Gallatin project illustrates it cleanly: four segments, eight records. Object identifiers 2915 and 6177 describe the same line. So do 2916 and 5936, 2917 and 6465, 2918 and 6092.[7]

Deduplicating on geometry, segment label and project name removes **1,215 records**, leaving **1,430 unique segments**.[8]

A naive sum over the raw layer overstates total corridor by about 86 percent.[9] Any figure published from this dataset without deduplication is wrong, and the error is large enough to be visible. This is stated plainly here because the data is public and others will compute from it.

8.2A A field that does not announce what it measures

`Shape__Length` is the single most misleading field TVA publishes, and it is misleading by omission rather than by error. Its name says length. Its units are not stated on the layer, in the service definition, or in any metadata TVA exposes. Anyone who

sums it — and it is the obvious thing to sum, because it removes the need to do any geometry at all — gets a number roughly 22 percent too large at these latitudes and receives no warning of any kind. That is a finding about how published geospatial data misleads the people it is published for, and it is recorded here as one.

TVA returns a `Shape__Length` field on every record. It is a **planar** length, measured in the service's Web Mercator projection rather than on the ground. Web Mercator inflates distance by roughly one over the cosine of the latitude, which at Tennessee and Mississippi latitudes is about 22 percent.

The check is available inside the data. Layer 0 carries its own `MILES` attribute, populated by TVA. Against that attribute, across 125 records:[10]

Method	Median error against TVA's own `MILES`
Geodesic length from the WGS84 coordinates	**−0.004%**
`Shape__Length` ÷ 1,609.344	**+22.5%**

Every mileage in this chapter is a Vincenty geodesic computed from the coordinates.

Two things are worth saying about this. The ratio in §8.4 is unaffected, because the distortion is common to both layers and divides out; the geodesic and planar ratios are within a hundredth of each other. And the trap is exactly the kind a public dataset sets for the people it invites to use it. A field named `Shape__Length` on a layer of transmission lines does not announce that it is measuring a Mercator plane.

8.3 The headline figures

After deduplication, on a geodesic basis:[11]

Unique route segments studied	1,430
Total route alternatives studied	**1,998.5 miles**
Projects represented	81 named, plus one unnamed group
Voltage populated	61 of 82

And on the selected centerlines layer:[12]

Raw records	447
Unique after deduplication	157
Total selected centerline	**648.0 miles**
Routes represented	70

The largest studied networks:[13]

Miles studied	Segments	Project
103.9	41	Red Hills–Leake, MS
95.1	32	West Batesville–North Oakland, MS
88.8	**57**	**Middle Tennessee Generation & Transmission Capacity Expansion**
80.7	42	Kentucky Area Improvement Phase 2
67.5	16	Montpelier, MS
64.8	42	Appalachia Area Improvement
63.7	35	Belmont Stage 2
55.6	48	Charity Lane, AL

Middle Tennessee Generation & Transmission Capacity Expansion is the third-largest studied network in TVA's entire portfolio. It is also the project whose environmental review was folded into a generation study that was never published, whose public page has not been updated since April 2024, and which does not appear in TVA's own index of current projects.[14] Chapter 12 covers it.

8.4 The ratio

The two layers do not cover the same set of projects, so the headline figures cannot be divided into each other. Restricting to projects present in both, joined on project identifier with null identifiers dropped, gives **46 projects**.[15]

Alternatives studied	**1,358.1 miles**
Centerline selected	**515.6 miles**
Ratio	**2.63 : 1**
Selected as a share of studied	38.0%

Per project across the 46: median 2.61, range 0.79 to 5.96.[16]

TVA studies 2.63 miles of route for every mile it selects. The median project and the aggregate agree, which means the figure is not being driven by a handful of large networks. It is insensitive to method and to join: a planar computation over a differently constructed 52-project set returns 2.62 and a median of 2.61.

That number is worth having for its own sake. Route alternatives are not free to the people who live under them. Every studied segment is a corridor that appeared on a map a property owner was shown, surveyed against, and in most cases eventually not used. The 842.5 miles of difference between studied and selected in this subset are corridor miles rather than distinct land: §8.6 records that overlap between alternatives for the same project was never tested.[17]

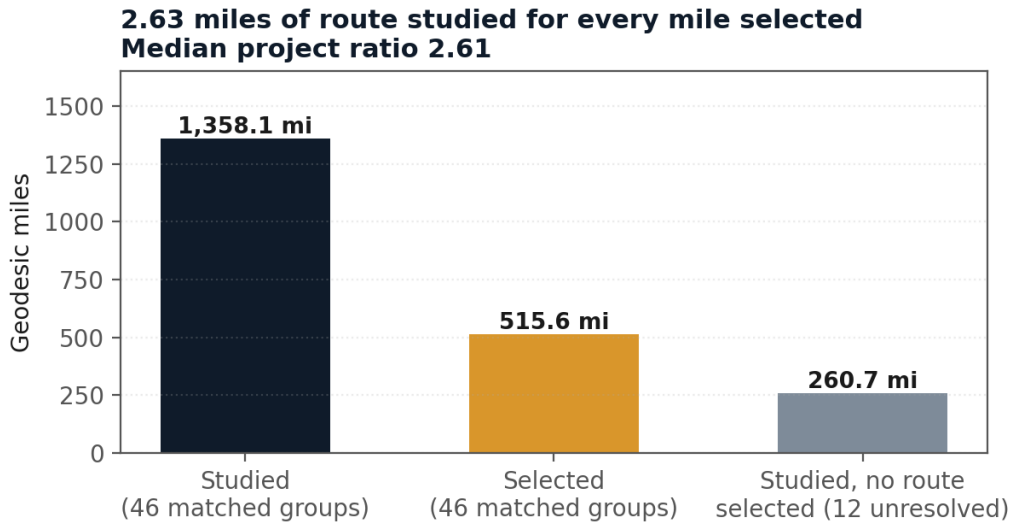


Figure 3. *Geodesic corridor mileage across the forty-six identifier groups appearing in both published route layers, with the twelve genuinely unresolved studied-only groups shown separately.*

8.5 The projects with no selected route, and how many of them are actually finished

Thirty-three identifier groups in the alternatives layer have no record in the selected centerline layer.[18] They account for **576.0 geodesic miles** of studied corridor.

And the 576 miles are not all unresolved. Two tests cut into them.

Sixteen of the thirty-three carry an `INSERVICE_DATE`, and every one is in the past — between June 2014 and October 2022.[19] Chapter 7 §7.2 established that this field is a clean built-or-unbuilt flag and that not one value is in the future. The largest of them is Charity Lane in Alabama, 55.6 studied miles, in service on **3 November 2014**.

Six more have a selected centerline filed under a *second* identifier, which §8.6 explains.

Netting the overlap, **twenty-one of the thirty-three are either built or routed. Twelve remain genuinely unresolved, accounting for 260.7 studied miles.**[20] They are South Macon–DeKalb, Roane County, West Lexington–Jacks Creek, 109 North, Commerce Park 2, New Transpark East, Sundown Drive, Jones Chapel, Stateline Road, Project CINCO Phase I, North Green Street and West Tennessee.

That is the figure this chapter publishes. Twelve corridors are drawn across identifiable ground with nothing settled, and four of the six longest projects in the Tennessee set are among the six with no environmental determination of any kind.

8.5A 109 North, and the ratio it does not have

109 North is one of the twelve. It carries **32.4 miles of studied alternatives** for a line of under four, and no centerline record under its own identifier.[21]

109 North has no ratio, and cannot have one until TVA settles the route. A ratio of 7.08 to one has circulated for this project. It is an artifact of a join that did not exclude null identifiers, which paired West Tennessee's alternatives against the 109 North centerline record and produced a number belonging to neither project.

Successive option sets appear to persist in the layer, so 32.4 miles is a rough record of how many times this corridor has been redrawn.[22]

The route as it stands is 3.85 miles, half a mile longer than the November 2024 preferred route. Easement purchases began this month. Construction and in-service dates are listed as to be determined.[23]

8.6 Where the arithmetic is soft

Two projects have a ratio below 1.0.[25] A selected centerline longer than the alternatives studied for it is not possible in reality, so those projects have incomplete alternatives data in the layer. They are Helicon–Trade in Alabama at 0.79, with 11.7 miles studied against 14.8 selected, and Star Gap at 0.94. The aggregate figures absorb them; individual project ratios should be checked before any single one is quoted.

Six projects are split across two identifiers, and the split is checkable from geometry. North Gallatin, Artesia, Midway–South Macon, Lewis Chapel, RailHub and Mulberry each appear twice: once in the alternatives layer under one identifier, once in the centerline layer under another. All six pairs are geometrically coincident — closest approach under 0.05 miles, five of them at zero.[24]

Merging them is a mechanical operation on deposited files, requiring no hand reconciliation, and it produces **52 identifier groups**: 1,450.1 miles studied against 556.1 selected, a ratio of **2.61 to one**. That is within two hundredths of the 46-group figure, which is the useful result — the ratio does not depend on the join.

Reproducibility does not decide between 52 and 46, because both are reproducible from the archive. The 46 comes from the identifier join, the 52 from a geometric merge of the six split pairs.

Two published figures do not survive the merge. Artesia becomes **16.47 to one**, displacing Fall Creek's 5.96 as the highest in the set. And Harding Springs–Gladstone, published at 5.14 among the highest five, becomes **0.48** — a third ratio below 1.0, which suggests the sub-1.0 cases arise from selected routes over-assembled across split identifiers rather than from missing alternatives.[25]

The cross-layer join is by project identifier, and the identifiers are maintained by hand. They disagree between the two layers for the same project. North Gallatin is 439098

in the alternatives layer and 533421 in the centerline layer. Artesia is 425127 and 431686.[26] One record carries a trailing underscore, another a hyphenated work order format, another a TPS prefix.[27] This chapter uses the mechanical identifier join and reports 46. A hand reconciliation against published page labels also gives 52; that reconciliation is not deposited and is not reproducible, though the geometric merge at Appendix C §C.5 reaches the same 52 mechanically. The two agree on the ratio to within a hundredth. Where they disagree is on which projects are in the set, and the mechanical version is the one a reader can check.[24]

Voltage is unreliable. Populated for 61 of 82 projects, and null on North Gallatin despite the public page stating 161 kV.[11] Voltage should be taken from the project page, not the register.

Corridor miles are not distinct land, and this chapter does not establish that they are. Deduplication removed records with identical geometry. It did not test whether the surviving segments *overlap* one another, and route alternatives for the same project routinely share ground — a common departure, a common river crossing, a common approach to a substation. The 2.63 ratio is unaffected, because overlap inflates both sides of it. But any sentence converting studied miles into land or into people is exposed: **the 842-mile difference between studied and selected is a difference in corridor mileage, not a measure of distinct ground, and "every studied mile crosses somebody's land" should be read as describing the register rather than the map.** A dissolve-and-remeasure on the deposited geometry would settle it and has not been run.[32]

And the 46-group set is not a random sample of TVA's portfolio. It is the projects appearing in *both* published layers, which excludes anything studied but never routed and anything routed without published alternatives. Projects with unusually many alternatives are more likely to have been captured in both layers at the moment of retrieval, and projects abandoned early are more likely to be missing from the selected layer altogether. The direction of that bias is not neutral: **excluding the studied-only groups removes 576.0 miles of pure alternatives with no selected mile against them, which means 2.63 is more likely to understate the portfolio ratio than to overstate it.**[33] The figure is reported as what it is — the ratio across the matched set — and should not be extrapolated to TVA's whole seven-state programme.

These are studied and selected corridors, not acquired easements. The register does not record what TVA bought. Right-of-way width appears on project pages and in a right-of-way layer holding only five features service-wide.[28] Converting corridor miles to acres of burden would need widths applied per project, and the width data is not complete enough to support it.

8.7 What this measurement does not require

No records request. No proprietary dataset. No georeferencing. No site visit. No cooperation from TVA.

The figures in this chapter were produced from an anonymous query against a public endpoint, in an afternoon, by anyone who knows the URL.[29] They were then written to disk with a hash so that they can be checked against the same source later, or against a changed one.[30]

That is a comment on the state of transmission oversight. The quantity of land that enters a federal corporation's siting process, and the quantity that leaves it, has been publicly computable this whole time. No prior computation of it was located.[31]

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S¹] single source, [I] author inference.

1. Method of the Virginia volume's corridor measurement: route alternatives published as PDF map exhibits, georeferenced against parcel data to recover studied and selected mileage. Described in the Virginia volume's method note and in `HANDOFF_Tennessee_Transmission_Volume.md`, 11 Aug 2026, project files. **[P]**

2. `corridor_maps/`, the Virginia corridor image library, project files. 916 MB as recorded in `HANDOFF_Tennessee_Transmission_Volume.md`, 11 Aug 2026; re-measured at 915 MiB on 16 Aug 2026. The library is not part of the Zenodo deposit. **[P] Open item, Appendix F §F.1.**

3. Turner, Tommy N. (2026). *TVA Transmission Siting GIS Capture, 15 August 2026* [Data set]. Version 1.0. Zenodo. https://doi.org/10.5281/zenodo.21959989. Route geometry and a `Shape__Length` value are returned on every feature of `TSSProjects_Hosted` FeatureServer layers 5 and 0. Endpoint https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services/TSSProjects_Hosted/FeatureServer, retrieved 2026-08-15T14:10:59Z. But see note 10: the published length field is not a ground distance. **[P]**

4. **Priority claim, and it is qualified.** An originality search run 16 Aug 2026 across SELC, Appalachian Voices, the Southern Alliance for Clean Energy, IEEFA, *Tennessee Lookout*, the Center for Biological Diversity, GitHub and the investigative-methods literature located no prior enumeration of TVA's ArcGIS organisation and no prior corridor measurement from it. Two limits on that finding: the search could not reach tennessean.com or bizjournals.com, which block automated retrieval; and law-review databases rate-limited before the scholarly literature could be swept. The claim should be read as "no prior measurement was located by the searches described," which is what it is. **[P, negative] Open item, Appendix F §F.1.**

5. Deposit 10.5281/zenodo.21959989, files `TVA_TSSProjects_L5_alternatives_p1_20260815.geojson` (2,000 features, SHA-256 `d9680cf1121d1a29ef058645d566b67e7adec8e08042dea4b6b3a98f0a6c59d4`) and `TVA_TSSProjects_L5_alternatives_p2_20260815.geojson` (645 features,

SHA-256 51837a7828255e6da505ecfa073285da940664602c0a3f21c3f8c2912d1b1393). Queries .../TSSProjects_Hosted/FeatureServer/5/query?where=1=1&outFields=*&f=geojson&resultRecordCount=2000&resultOffset=0 and the same with resultOffset=2000, retrieved 2026-08-15T14:10:59Z. Server-reported layer-5 count at capture: 2,645, recorded in gis_archive_20260815/MANIFEST.txt. **[P]**

6. Ibid., layer 5. Duplicate pairs share geometry, SEGMENT, PROJECT_NAME, PROJECT_ID and Shape__Length, and differ in OBJECTID and GlobalID. **[P]**

7. Ibid. PROJECT_NAME = 'North Gallatin' returns eight records across four SEGMENT values: segment 1 = OBJECTID 2917/6465, segment 2 = 2916/5936, segment 3 = 2915/6177, segment 4 = 2918/6092. **[P]**

8. Deduplication key as run: the GeoJSON geometry coordinates, SEGMENT, and PROJECT_NAME. On the archived files this removes 1,215 of 2,645 records and leaves 1,430. PROJECT_NAME is load-bearing and belongs in any published statement of the rule: without it, sixteen geometrically identical segments belonging to differently named projects are wrongly merged and the count falls to 1,414. Code at Appendix C, recompute_corridor_v2.py. **[P]**

9. Raw geodesic sum over the 2,645 undeduplicated layer-5 records is 3,725.0 miles against 1,998.5 after deduplication: an overstatement of 86.4 percent. **[P]**

10. **The projection.** Shape__Length is returned in the service's Web Mercator (EPSG:3857) projection and is a planar length, not a ground distance. Validation against layer 0's own TVA-populated MILES attribute, restricted to the 125 deduplicated records where MILES is greater than zero: Vincenty geodesic length computed from the WGS84 coordinates has a median error of −0.0044 percent; Shape__Length ÷ 1,609.344 has a median error of +22.48 percent. All mileages in this chapter are geodesic. Code at Appendix C. **[P]**

11. Deposit 10.5281/zenodo.21959989, layer-5 files as at note 5; deduplication as at note 8; geodesic computation as at note 10. Distinct non-null PROJECT_NAME values number 81; an eighty-second group carries a null name. KV is non-null on at least one segment for 61 of the 82. **[P]**

12. Deposit 10.5281/zenodo.21959989, file TVA_TSSProjects_L0_centerline_20260815.geojson, 447 features, SHA-256 2898370e8f998270834517dab9927ede84ad0bee7f8a3b89f89c83ca1af6fd0a, query .../TSSProjects_Hosted/FeatureServer/0/query?where=1=1&outFields=*&f=geojson, retrieved 2026-08-15T14:10:59Z. Deduplication on geometry leaves 157 records across 70 distinct NAME values totalling 648.0 geodesic miles. Distinct non-null NAME values number 69; the seventieth is an unnamed group. **[P]**

13. Per-project geodesic sums over the deduplicated layer 5, as at notes 8 and 10. **[P]**

14. Rank from note 13. The April 2024 update stamp, the statement that NEPA review would be incorporated into the Cheatham County Generation Site EIS, and the page's absence from TVA's project index are established at Chapter 12 and its notes; page capture `TVA_page_capture_middle_tennessee_gt_20260816.txt`, deposit 10.5281/zenodo.21959989. **[P]**

15. Cross-layer join on `PROJECT_ID`, records with a null identifier excluded, both layers deduplicated as above. 46 projects appear in both. Code at Appendix C. **[P]**

16. Per-project ratios across the 46, as at note 15. Median 2.61; the aggregate 2.63. **[P]**

17. Arithmetic on note 15: 1,358.1 − 515.6 = 842.5. **[P]**

18. Layer-5 groups with a non-null `PROJECT_ID` absent from the deduplicated layer 0, or present with zero length: **33 groups, 576.0 geodesic miles**. Recomputed independently. **[P]**

19. `INSERVICE_DATE` on the deduplicated layer 5, restricted to the 33. Sixteen carry a value and every one is in the past, from 1 June 2014 to 13 October 2021. The largest is Charity Lane, AL, `PROJECT_ID` 205817, 55.6 studied miles, in service 3 November 2014. Chapter 7 §7.2 and its note establish that the field is populated on 40 of the 81 named groups and that no value is in the future. **[P]**

20. 33 less 16 built less 6 split across identifiers, netting one overlap (Artesia, which is both), leaves 12 groups and 260.7 studied miles. The six splits are at note 24. **[P]**

21. Alternatives for `PROJECT_ID` 631204 under both `109 North, TN` and `109 North TN 161kV Delivery Point`: 32.4 geodesic miles. No centerline record carries that identifier. A centerline record of the same name exists with a **null** identifier, which is what makes the collision possible. **[P]**

22. The 7.08 ratio reported for 109 North was an artifact of joining on `PROJECT_ID` without excluding nulls: `West TN Power System Improvements` (64.4 miles of alternatives, null identifier) was bucketed with the `109 North TN 161kV Delivery Point` centerline record (7.0 miles, also null). Recomputed on the geodesic figures the artifact is 9.16; it was published as 7.08 on the planar figures then in use. It belongs to neither project. That successive option sets accumulate in the layer remains the author's explanation and not TVA's; `created_date` and `last_edited_date` are identical across the duplicate pairs examined, which is consistent with a repeated import rather than versioning. **[P for the correction; I for the accumulation]**

23. TVA, *109 North, Tennessee (Sumner County)*, capture 16 Aug. 2026, `TVA_page_capture_109_north_sumner_county_20260816.txt`, deposit 10.5281/zenodo.21959989: 3.85 miles in the August 2026 update against 3.34 in November 2024; schedule table gives easement purchases beginning August 2026 and construction start and in-service both "To be determined." **[P]**

24. Six identifier pairs, each appearing once in layer 5 and once in layer 0: North Gallatin 439098/533421; Artesia 425127/431686; Midway–South Macon 425126/528640;

Lewis Chapel 536149/53649-2T0FP; RailHub 555085_/555085; **Mulberry 541227/541224**. Coincidence was tested by minimum separation between the two geometries rather than endpoint distance — the pairs are 4 to 9 miles apart end-to-end and **under 0.05 miles at closest approach**, five of the six at zero. Merging all six is a mechanical operation on deposited files: 52 groups, 1,450.1 / 556.1 = 2.61:1, median 2.58, range 0.79–16.47. Code at Appendix C. **[P]**

25. On the merged set, Artesia becomes 16.47:1 (24.7 studied / 1.5 selected) and Harding Springs–Gladstone becomes 0.48 (7.3 studied / 1.4 + 13.8 = 15.2 selected, merging 533773 and 533772). Helicon–Trade becomes 0.46 (11.7 / 14.8 + 10.4 = 25.2, merging 541138 and 438921). **Two limits on this note.** Neither the Harding Springs–Gladstone merge nor the Helicon–Trade merge is among the six pairs note 24 uses to build the 52-group set, so neither value lies inside that set's range. And merging 425126 with 528640 gives Midway–South Macon 19.4 / 19.5 = 0.995, a fourth sub-1.0 case; the reading below fits four of four rather than three of three. **[P for the figures; I for the reading]** — that the sub-1.0 cases arise from selected routes assembled across split identifiers rather than from missing alternatives is the author's inference, and it fits four of four cases. **Open item, Appendix F §F.1.**

26. Distinct `(PROJECT_NAME, PROJECT_ID)` and `(NAME, PROJECT_ID)` values on the archived layers: North Gallatin 439098 in layer 5 against 533421 in layer 0; Artesia, MS 425127 against 431686. **[P]**

27. Ibid.; `RailHub, MS Phase 1` carries `555085_` in layer 5 against `555085` in layer 0, Lewis Chapel Delivery Point `536149` against `53649-2T0FP`, and Roane County the value `TPS212623`. Recorded in `TVA_Register_Crosswalk_v0_1.md`, addendum of 15 Aug 2026. **[P]**

28. Deposit 10.5281/zenodo.21959989, file `TVA_TSSProjects_L2_row_20260815.geojson`, 5 features, SHA-256 `0200c221378410d878e0574ec8db59e383f8cea491e6a67712dede0d883fefef`, query `.../TSSProjects_Hosted/FeatureServer/2/query?where=1=1&outFields=*&f=geojson`. Right-of-way width appears on 17 of the 18 Tennessee project pages: coded census, Chapter 4 §4.4 and Appendix A. **[P]**

29. Anonymous ArcGIS REST query, no token and no authentication; `capabilities: "Query"` on `TSSProjects_Hosted`, recorded in `TVA_TSSProjects_service_root_20260815.json` (SHA-256 `f7c2831282ed08f4d2ed810c1e921418278461c40dae7f66962aebb698c22d51`) and `TVA_TSSProjects_all_layers_20260815.json` (SHA-256 `5afcb16c2707beea652577f9b2c18d25a752f28de924fd3e6e08233aaef317d8`), deposit 10.5281/zenodo.21959989. Method stated at `gis_archive_20260815/MANIFEST.txt`. **[P]**

30. `gis_archive_20260815/MANIFEST.txt`: byte count, feature count, SHA-256 and source URL per file, 15 files and 3,385 features, host clock 2026-08-15T14:10:59Z. The manifest also records that the files were first written with a 20260813 datestamp

from a sandbox clock two days slow, and that the folder and filenames were corrected to 20260815 without change to content. **[P]**

31. **Priority claim, and it is qualified on the same terms as note 4.** It rests on the same originality search, run 16 Aug 2026 across SELC, Appalachian Voices, the Southern Alliance for Clean Energy, IEEFA, *Tennessee Lookout*, the Center for Biological Diversity, GitHub and the investigative-methods literature, which located no prior corridor computation from TVA's ArcGIS organisation. It carries the same two limits: tennessean.com and bizjournals.com block automated retrieval and could not be reached, and law-review databases rate-limited before the scholarly literature could be swept. The claim is "no prior computation was located by the searches described," not that none exists. **[P, negative] Open item, Appendix F §F.1.**

32. Deduplication key at §8.2 and Appendix C §C.3: geometry, segment label and rounded length. Overlap between non-identical segments was **not tested**, and no dissolve was performed. Stated as a limit on interpretation rather than on the ratio, which is invariant to overlap because both numerator and denominator carry it. **[P for the method; I, negative for the untested overlap] Open item, Appendix F §F.1.**

33. The 46 groups are the intersection of the deduplicated alternatives layer and the deduplicated centerline layer on non-null `PROJECT_ID`; 33 further groups carry alternatives and no selected route, totalling 576.0 miles (§8.5, note 18). Including them is not possible without a selected mileage to divide into, which is why they are reported separately rather than merged. The direction of the resulting bias is stated as an inference. **[P for the sets; I for the direction]**

Chapter 9 — Who Pays, and Where the Money Does Not Go

Statutory text and TACIR appendices verified August 2026.

9.1 The comparison

Virginia taxes the corridor. Tennessee does not, and cannot.

A Virginia locality levies property tax on the transmission assets standing in it. The State Corporation Commission centrally assesses public service corporation property and then "distribute[s] the assessed values to each city, county and town in which the property is located," and the locality applies its own real estate rate.[1] A county that hosts a line collects revenue because it hosts the line.

Tennessee counties collect nothing from TVA property, because they may not:[2]

> "The payments herein authorized are in lieu of taxation, and the Corporation, its property, franchises and income, are expressly exempted from taxation in any manner or form by any State, county, municipality, or any subdivision or district thereof."

What replaces the tax is a payment TVA makes to the state, and the whole of this chapter turns on how that payment is apportioned.

9.2 The federal formula is state-level on both factors

Section 13 of the TVA Act sets the total at 5 percent of gross power proceeds, phased down from 10 percent in 1940.[3] The apportionment among states is a two-part calculation, stated in the statute:[4]

> "One-half of said payment shall be apportioned by paying to each State the percentage thereof which the **gross proceeds of the power sales by the Corporation within said State** during the preceding fiscal year bears to the total gross proceeds from all power sales…; the remaining one-half of said payment shall be apportioned by paying to each State the percentage thereof which the **book value of the power property held by the Corporation within said State** at the end of the preceding fiscal year bears to the total book value of all such property…"

Both factors are computed *within said State*. Neither is computed by county.

TVA's own description, reproduced in the Tennessee Advisory Commission on Intergovernmental Relations' annual report, confirms it: 50 percent on the ratio of TVA power property within the state, 50 percent on the ratio of power sales within the state.[5]

Transmission plant plainly feeds the property factor — it is a distinct and large asset class, $6.0 billion net in TVA's FY2023 accounts.[6] It feeds it at the state level. A county that hosts fifty miles of new 161-kV line and a county that hosts none contribute identically to Tennessee's share, which is to say the location of the wire is invisible to the computation.

9.3 Tennessee's redistribution ignores transmission entirely

Tennessee then distributes what it receives. T.C.A. § 67-9-101 holds the FY1977–78 amount harmless and splits any increase above that base: 48.5 percent retained by the state, 48.5 percent to counties and municipalities, and 3 percent to localities experiencing TVA construction activity on power-producing facilities.[7]

Section 67-9-102(a)(1) splits the local share four ways:[8]

Share of local 48.5%	Basis	Share of total
30%	county **population**	14.55%
30%	county **land area**	14.55%
10%	acres of **TVA-owned land** in the county	4.85%
30%	**municipal population**	14.55%

Nothing in that formula reflects asset value, asset type, or the presence of a transmission corridor. The only geographic-asset factor is 4.85 percent of the total, keyed to acres of TVA-*owned* land, which is dominated by reservoir and dam holdings rather than by rights of way.

So no located provision of the Tennessee formula credits a county for hosting a transmission corridor. Its population does not change. Its land area does not change. Its acreage of TVA-owned land does not change on the face of the statute, because a transmission right of way is an easement rather than a fee interest.[9]

That is stated as what the located formula omits rather than as a certainty that the amount is zero, and the difference matters. Two questions behind it are unresolved and are set out at §9.7: whether TVA capitalises easements into the book value that drives the federal property factor, and whether easement acreage is counted under § 67-9-102(a)(1)(C) despite the statute's "owned by" language. If both questions resolve against the county, the amount is zero. If either resolves for it, the amount is small and state-mediated rather than absent. **What is established either way is that no factor in the formula is keyed to the corridor's location**, so a county hosting fifty miles of new line and a county hosting none are treated identically on every factor the statute names.

9.3A The one impact payment, and the four words that exclude transmission

Tennessee does have a mechanism for compensating a locality that absorbs TVA construction. It is the 3 percent set aside by § 67-9-101(a)(3), and it is written for generation.

The statute directs the impact share to areas experiencing:[20]

> "Tennessee Valley authority **construction activity on facilities to produce electric power**."

A transmission line is not a facility to produce electric power. It moves power that a facility elsewhere produced. On the statute's face the impact payment does not reach transmission construction at all, and the state's own guidance to local officials describes the fund the same way, as attaching to power-*production* projects.[21]

The result is a closed loop, and it can be stated in four steps. The federal formula apportions by state and cannot see a county. The state formula apportions by population and acreage and cannot see an asset. The one asset-keyed factor, at 4.85 percent of the total, counts land TVA *owns*, and a right of way is an easement. And the one construction-impact factor is limited to generation.

A county can host fifty miles of new 161-kilovolt corridor and be, at every stage of the calculation, indistinguishable from a county that hosts none.

The mechanism can be watched running. In FY2024–25, impact payments rose $3.8 million, distributed to Benton, Henry, Houston, Humphreys, Roane and Stewart Counties — all generation sites. In the same year, formula payments to every other county in the state fell by $2.8 million.[22] Generation construction moved money toward the counties hosting it and away from everyone else. Transmission construction, of which there was a great deal, moved nothing in either direction.

9.4 The direct county payments are a legacy make-whole

The statute does contain one county-level mechanism, and it is narrow. TVA must pay counties directly the two-year average of the ad valorem taxes previously levied on power property **acquired from privately owned utilities**, for as long as TVA owns it.[10]

The scale settles its significance. Direct county payments in Tennessee total **$3.4 million against roughly $405 million** paid to the state in FY2024–25 — under one percent — and the figure is flat across all six years TACIR tabulates.[11]

It is compensation for a 1930s-era acquisition, not a mechanism that responds to where TVA builds now.

9.5 Nobody publishes what a county carries

TVA publishes tax equivalent payments in aggregate. Its Form 10-K carries a single expense line.[12] A 2016 fact sheet gives the split by state.[13] There is no TVA publication of the payment by county.

The county-level tables that exist are published by **Tennessee**, not TVA. TACIR's annual report to the General Assembly gives eight fiscal years by county and by city.[14] Those tables are the output of the population-and-acreage formula, so they show precisely what this chapter argues: the distribution has no relationship to where the wire sits.

For comparison, the FY2016 state split: Tennessee $351.8 million, Alabama $94.2 million, Mississippi $40.3 million, Kentucky $35.1 million, Georgia $8.9 million, North Carolina $2.8 million, Virginia $1.3 million, Illinois $0.4 million.[15]

9.6 What this means for a host county

Set the two systems side by side for a county with a new 161-kV line and no data centre.

In Virginia, the corridor enters the local tax base. The county's revenue rises because the asset stands there. The county also had a forum in which to be heard about the route, and its governing body received statutory notice.[16]

In Tennessee, the corridor produces no local revenue attributable to it, the county had no forum, and the county's share of TVA's payment is determined by how many people live there and how many square miles it covers.

That is the concentrated-benefit, dispersed-burden structure the Virginia volume documented, in a sharper form. Virginia's version is a mismatch between where benefit accrues and where burden lands, mediated by a tax system that at least follows the asset. Tennessee's version removes the mediation.

9.6A The two terms, defined, because the series title asserts them

Concentrated benefit and *dispersed burden* are the series line above this volume, and a title that asserts something the evidence does not reach is a liability. Both terms are therefore defined here, at the size this volume can support.

Dispersed burden is the half this volume measures directly, and it is measurable in four ways.

By corridor. TVA studies **2.63 miles of route for every mile it selects**, computed across the forty-six identifier groups appearing in both published route layers, with a median project ratio of 2.61.[23] Studied corridor is not the same as distinct land: Chapter 8 §8.6 records that overlap between alternatives for the same project was never tested, so the

mileage counts corridor and not acreage. What the mileage does establish is that a studied alternative that is not selected still puts a property under examination, and the register records that examination even where nothing was ever built.

By residue. Thirty-three identifier groups carry studied corridor and no selected route. Twelve of those are genuinely unresolved once the built and split-identifier cases are removed — **260.7 studied miles across which nothing is settled**.[24]

By parcel. Eight of the eighteen project pages tell owners how many of them there are, and those eight are all projects opened before 2024.[25] North Gallatin's page gave 165 owners across 225 parcels. The other ten pages do not say, so the total number of Tennessee property owners inside a studied TVA corridor is not computable from what TVA publishes.

By duration. An easement is permanent. A rate case recurs and can be contested again; a corridor cannot be un-drawn.

Concentrated benefit is the half this volume cannot measure, and says so. Sixteen of eighteen project pages name no beneficiary, and Chapter 14 §14.7 records that only three projects had an identifiable end-use customer at all. So this volume does not claim that every corridor serves one concentrated beneficiary. What it establishes is narrower and is enough for the series line to be honest: **where a concentrated beneficiary exists, the public record does not name it, and where the burden falls, the public record names the parcels.** The asymmetry is between what the record captures about the two sides, not a claim about how the economics actually distribute.

A reader who wants the economics of the benefit side should read the Virginia volume, where a state tax system that follows the asset makes the distribution visible. The point of this chapter is that Tennessee's does not, so the question cannot be asked of the record at all.

9.7 Two things this chapter does not establish

Whether transmission easements count in the book value. Transmission plant as a class clearly feeds the 50 percent property factor. Whether TVA capitalises the easements and rights of way themselves into that book value is not established by any source located.[17] It matters, because it determines whether corridor acquisition moves the state-level number at all.

Whether easement acreage counts under § 67-9-102(a)(1)(C). The statute says land "owned by" TVA. An easement is not fee ownership. No Tennessee Department of Revenue or TVA guidance was located either way.[18]

Both are answerable by a records request. The companion guide, request T8.

One further caution. TACIR states that a planned relocation of TVA's power control centre from Hamilton to Meigs County "has already resulted in an increase in direct payments to

Meigs County."[19] That is looser than the statute's acquired-from-private-owners condition, and it could not be reconciled against TVA's actual computation. Treat it as reported and unverified.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. Va. Code Ann. §§ 58.1-2604(A), 58.1-2606(A) (2026); Virginia SCC, Division of Public Service Taxation, description of function. **[P]**
2. 16 U.S.C. § 831l (2024). **[P]**
3. Ibid. **[P]**
4. Ibid. (emphasis added). **[P]**
5. TACIR, *TVA's Payments in Lieu of Taxes: Annual Report to the Tennessee General Assembly* (Feb. 2026), App. A, at 25. **[P]**
6. TVA, Form 10-K, FY2023, Note 6 (Completed Plant): transmission $9,375M cost, $3,359M accumulated depreciation, $6,016M net. **[P]**
7. Tenn. Code Ann. § 67-9-101 (2025). **[P]**
8. Tenn. Code Ann. § 67-9-102(a)(1) (2025); shares of total per TACIR App. B, at 27. **[P]**
9. **[I]** — the easement point follows from the statutory text "owned by," but see §9.7 and endnote 18.
10. 16 U.S.C. § 831l (2024) (proviso); TACIR App. A. **[P]**
11. TACIR (Feb. 2026), Tennessee totals FY2024–25; $3.4M direct payments flat across six tabulated years. **[P]**
12. TVA, Form 10-K, FY2023, "Tax equivalents" expense line ($593M). **[P]**
13. TVA, *Tax Equivalent Payments Fact Sheet* (Nov. 2016). **[P]**
14. TACIR (Feb. 2026), Apps. C–F. **[P]**
15. TVA fact sheet (Nov. 2016). **[P]** — 2016 vintage. **Open item, Appendix F §F.1.**
16. Va. Code Ann. § 56-46.1(B), (D) (2026). See Chapter 1 §1.8. **[P]**
17. No source located. **[P, negative] Open item, Appendix F §F.1.**
18. No source located. **[P, negative] Open item, Appendix F §F.1.**
19. TACIR (Feb. 2026), at 11. **[S[1]]**
20. Tenn. Code Ann. § 67-9-101(a)(3) (2025) (emphasis added). **[P]**
21. County Technical Assistance Service, *TVA In Lieu of Tax Payments*, https://www.ctas.tennessee.edu/eli/tva-lieu-tax-payments; Municipal Technical Advisory Service, *Special Impact Area Funds — TVA*, MTAS-1882. Both describe the impact fund as attaching to power-production construction. Neither addresses transmission expressly, so this is a reading of the statutory text corroborated by the state's own explanatory guidance rather than a ruling. **[P for the text; S for the reading]**

22. TACIR (Feb. 2026), FY2024–25 tables. The named counties are the recipients of the increase. **[P]**

23. Chapter 8 §§8.3–8.5 and notes 15–17. Aggregate 2.63:1 across 46 mechanically matched identifier groups; median project ratio 2.61. Geodesic recomputation; see Appendix C. **[P]** 24. Chapter 8 §8.5 and notes 18 and 20; Appendix C §C.5. Thirty-three groups totalling 576.0 studied miles, of which sixteen carry a past in-service date and six have a selected route under a second identifier, leaving twelve unresolved at 260.7 miles. **[P]** 25. Chapter 4 §4.3 and Appendix A. The eight pages stating owner counts, and the absence of any owner count on the remaining ten, are page-stated figures rather than a count of unique people; Appendix A §A.4 records that every one of the eight is prefixed “about” on the page. **[P]**

PART IV — CASES

Chapter 10 — Sumner County

Archival research 15 August 2026. Page text verified against 22 Internet Archive captures and live fetches; GIS artifacts archived at `gis_archive_20260815/`.

10.1 What TVA told the newspaper

On 20 February 2021, the *Tennessee Star* published a story under a headline that began: “Proposed Tennessee Valley Authority Transmission Line to Service New Facebook Data Center and Economic Development in Gallatin Will Impact Hundreds of Residential Property Owners’ Values and Raises Safety Concerns.”[1] Laura Baigert’s opening sentence carried the customer, the burden and the count together:

> “A Tennessee Valley Authority (TVA) proposed transmission line that will service the new Facebook data center and support future economic development in Gallatin will impact as many as 165 property owners representing about 225 parcels, lowering their property values and raising their concerns for safety.”

Six days later the *Gallatin News* put the question to TVA directly. Josh Cross asked why the line was needed, and TVA’s spokesperson, Malinda Hunter, told him the project would “support the increasing load in the area for many customers” including an $800 million Facebook data center then under construction.[2]

The comment period on that project was open when the *Star* ran. It had begun on 21 January and closed on 22 February.

TVA’s public project page for the same line, published for the property owners along the route, said this, and says it today:[3]

> “TVA is considering improvements to its transmission system in order to provide power for growing load and increase power reliability in the Gallatin area of Sumner County.”

Three statements about one line, inside a single week. A reporter named the customer. TVA, asked, confirmed the connection — though the connective *including* is the reporter’s word and not TVA’s, and Chapter 15 §15.4 is careful that this is an inclusion rather than an identification. The page written for the people whose land the line would cross named no one, and five and a half years later still does not.

That is the whole argument of this volume in a single county, and the rest of this chapter is the surrounding detail.

One consequence should be drawn immediately, because it bears on the obvious defence. The customer’s identity was publicly known and contemporaneously reported. A local reporter had it in print within seven weeks of the project opening, while the comment period was still running, and TVA’s own spokesperson, asked directly, placed the data

centre among the customers the line would serve. Whatever explains the omission from the project page, it is not that the information was unavailable, and it is not that TVA declined to say it — TVA did say it, to a newspaper, in the same week the page did not.

What this does *not* establish is that no contractual restriction existed. No agreement between TVA and the customer has been examined. The question is left open here and is put in writing at the companion guide, request T7, which asks for the economic development agreements and any non-disclosure agreements covering Tennessee service of 75 megawatts or greater. If such an agreement exists, the asymmetry has a mechanism; if none does, it does not. Either way the fact stated above survives, because a restriction that permitted a spokesperson to name the customer to the *Gallatin News* cannot explain the silence of the page written for the people whose land the line would cross.

10.2 The customer

Meta, then Facebook, announced a data centre at Gallatin on 12 August 2020: $800 million, 982,000 square feet, roughly 100 permanent jobs, more than 1,100 construction workers at peak. Tennessee announced it the same day. The state's release described the project as "the culmination of a three-year recruitment effort by the Gallatin Economic Development Agency, the Tennessee Department of Economic and Community Development and Tennessee Valley Authority."[5]

TVA was a named recruiting partner. Its senior vice president for economic development is quoted in the state's release by name.

The land had been bought three months earlier, in May 2020, by an entity called Woolhawk LLC: roughly 809 acres for about $20 million. The project's code name during recruitment was Project Woolhawk. The address is 1432 Gateway Drive, Gallatin.[6]

The campus has grown four times since. A second phase in June 2022 took it past 1.6 million square feet and the investment to nearly $1 billion. Gallatin's planning commission approved a further 276,000 square feet in May 2024, on a site plan whose open ground was labelled "Future 5-6 Build," and a 135,000 square foot tent-structure facility in September 2025.[7] Tennessee Lookout's July 2026 census of the state's data centres records Meta Gallatin buildings 1, 2 and 3 operating and buildings 4, 5 and 6 planned.[8]

The only published figure for the campus's electrical load is journalistic. WPLN reported in November 2025 that it "is using up to 300 megawatts of electricity."[9] Meta has never published a load figure. Neither has TVA.

For scale: Gallatin Department of Electricity, the local power company, reported about $73.1 million in total electric revenue for 2023 across roughly 17,300 customers.[10]

10.3 Two lines, and only one of them is about Meta

Sumner County holds two TVA transmission projects, and it matters that they are separate.

North Gallatin was announced on 21 January 2021, five months after the Facebook announcement and eight months after the land purchase. TVA proposed to invest $9 million in up to seven miles of double-circuit 161-kV line running from the Gallatin–Portland line to a new North Gallatin substation.[11] The April 2021 update placed the substation:

> "about one-half mile east of the eastern end of Gateway Drive and about one-half mile south of Roundtree Drive in Gallatin."

Meta's campus address is 1432 Gateway Drive. Published descriptions place the site south of Roundtree Drive, west of Brights Lane, north of Hartsville Pike. The state placed the facility in the Gallatin Industrial Park.

TVA sited a new 161-kV substation across the street from a campus that had broken ground five months earlier, and told property owners it was for growing load.[12]

The line went into service in the winter of 2023–24. The campus came online in November 2024.

109 North is a different project in a different part of the county, opened in May 2024, running to a Gallatin Department of Electricity substation near West Albert Gallatin Avenue and Highway 109. Its stated driver is GDE's northern service area:

> "GDE has been experiencing electrical reliability and capacity issues in this area, and in extreme peak conditions the current system is overloaded. Several residential and commercial developments are underway and/or coming soon including developments just outside the city limits to the north and west."

Residential and commercial developments.[13] That is as specific as it gets.

The adjacency argument applies to North Gallatin and not to 109 North. Anyone reading this chapter should keep them apart, because a reader who conflates them will conclude the whole analysis is loose. 109 North is interesting for a different reason.

10.4 Towers built for something that does not exist on paper

The 109 North page was updated in August 2026. It now says:

> "The structures installed on the existing TVA easement will be lattice steel towers that can support both the current 161-kV line and a future 500-kV line as electric generation is added in the area. The 161-kV line would be built under the 500-kV line on the transmission towers, reducing the need to acquire additional future easements."

A 500-kV circuit is a different order of infrastructure from a 161-kV distribution feed. Building the towers for it now, and saying so, is a statement that TVA expects something substantial in Sumner County.

No filed document located by the searches described identifies it. TVA's environmental reviews index carries no environmental assessment and no environmental impact statement for new generation in Sumner County, and a Federal Register search returns none; the categorical exclusion register has not been searched for generation actions in the county, and that limb is not claimed. The Gallatin Fossil Plant sits in the county, 976 megawatts of summer net capacity from units built between 1956 and 1959, and TVA's environmental docket for it contains four entries, all coal-ash and pollution-control legacy work. TVA's announced gas builds are at Cumberland, Kingston, Cheatham, Memphis and Brownsville.[14]

TVA's own generation siting dataset is more forthcoming than its environmental docket. `GeneSIS_Layers`, published on the same ArcGIS organisation, holds 151,858 Tennessee tax parcels intersecting TVA's generation siting areas of interest across fourteen Middle Tennessee counties, at a study phase of "Initial Feasibility Processing," in a snapshot dated 30 July 2025.

Sumner County accounts for 15,441 of them.[15]

That is not a proposal and it names no project. It is TVA's own record that it was evaluating generation sites in Sumner County in the same period it wrote a sentence about generation being added in the area, while filing nothing.

10.5 The route that moved

TVA's November 2024 preferred route for 109 North began on the Gallatin Primary–North Gallatin line near Dobbins Pike and Wallace Road, ran 3.34 miles west and southwest, and was scheduled to be in service in the winter of 2025–26.

The Gregory family farm is on Dobbins Pike, at the eastern origin of that route. It is a 239-year-old property running children's educational programmes. Opposition organised, a petition gathered roughly 2,500 signatures, and the story reached national coverage.[16]

TVA paused the project in the week of 19 February 2026. On 19 March 2026, at an on-site meeting with a senior vice president, TVA abandoned the farm crossing.

The route as it stands in August 2026 is 3.85 miles, half a mile longer. Easement purchases begin this month. Construction and in-service dates are both listed as "to be determined."[17]

Against the register, 109 North carries **32.4 miles of route alternatives** — for a line of under four miles — and no selected centerline at all.[18] The absence is the point.

109 North has no ratio, because it has no selected route. A ratio of 7.08 to one has circulated for this project. It is an artifact of a cross-layer join that failed to exclude null project identifiers, which bucketed West Tennessee's alternatives against the 109 North centerline record and produced a number belonging to neither project.[19]

Successive option sets appear to persist in the layer, so 32.4 miles is a rough record of how many times this corridor has been redrawn — and every redraw is a set of landowners told a line might cross their property and then told something else.

The farm won. The line is still coming.

10.5A The only determination on the record is for soil borings

TVA publishes registers of completed categorical exclusion checklists, naming each project and the exclusion applied. Eight documents, 27 April 2020 to 31 March 2026, **11,899 records**.[23]

109 North appears in that series once:[24]

> CEC **54972**, "Highway 109 North Delivery Point Soil Borings," Sumner, TN, closed 11 September 2025, **CE 13**.

Exclusion 13 covers "[e]ngineering and environmental studies that involve minor physical impacts, including but not limited to, geotechnical borings."

There is no determination for the line. As of the list covering the quarter ending 31 March 2026, TVA had published no categorical exclusion, no environmental assessment and no environmental impact statement for the 3.85 miles of 161-kilovolt transmission, for the lattice towers sized to carry a future 500-kV circuit, or for the easements it began purchasing this month.[25]

Absence from the published lists is not proof that no determination exists. The series lags — the first quarter of fiscal 2026 records zero exclusion-16 determinations across TVA's entire system, the only such quarter in six years — and a determination closed after March 2026 would not yet appear anywhere.[26] The honest form is the narrow one: as of TVA's most recent published list, the only thing on this project for which TVA has published an environmental determination is the boreholes.

Set beside §10.4, that is the shape of the record in Sumner County. TVA has published a determination for drilling holes to see what the ground is made of, and has published nothing for the towers, the corridor, or the generation the towers are sized for.

10.6 What the public conversation was about

The Meta connection was reported in 2021 and then dropped out of the coverage entirely. It has not resurfaced.

Not one of the outlets covering the 109 North dispute in 2026 — NewsChannel 5 in February, WSMV in February, FOX 17 in March, the *Gallatin News* in March — names a data centre, Meta, or any customer.[4] Two things are true at once, and the chapter needs both.

The 2021 attribution was correct and belongs to the *Tennessee Star*. And no source, including this one, connects the 2024 project to any data centre.

The public attribution in 2026 runs elsewhere.

A county commissioner told FOX 17 in March 2026 that the power line was to supply new housing developments in Gallatin, and framed the dispute as a consequence of "irresponsible growth and reckless rezonings." The Gregory farm campaign was about annexation, land, and a historic property. TVA's own line to reporters during the dispute was about supporting "the Administration's energy dominance goals."

Gallatin is separately moving toward a data centre moratorium. A councilmember proposed a two-year pause in June 2026; the council voted to move forward with drafting one in July. The city has no definition of a data centre in its ordinances. The mayor observed that "no data centers have expressed interest in Gallatin" recently and that "our sprinkler users in the city of Gallatin use more water than Meta does."[20]

That mayor is the same official quoted welcoming Facebook in the state's 2020 announcement.

Two public conversations about the same campus, running in the same city in the same year, and neither touches the other. A moratorium debate that does not mention the transmission corridor. A transmission fight that does not mention the data centre. The connection is on the record in February 2021 and then disappears from it for five years.

10.7 The record was never altered

The obvious question about §10.1 is whether TVA said more at the time and later removed it.

It did not. Sixteen archived captures of the North Gallatin page between March 2021 and April 2025 collapse to three distinct body texts. Every difference is additive or clerical.[21] The January 2021 text survives verbatim under a "Background" heading five years later, including the sentence directing readers to a virtual open house that closed in February 2021.

The schedule table has never been updated. It still lists the project as going into service in the winter of 2023–24, a date that passed two and a half years ago.

TVA does not conceal its relationship with Meta generally. Its own newsroom carries a story about a Shelby County solar site that reads: "Facebook will use 110 megawatts of the solar energy to support their data center operations in Gallatin, Tennessee," with a hyperlink to the Gallatin Data Center's own page.[22]

There is no corporate rule against naming the customer. The omission is specific to the pages that landowners in the right-of-way were pointed to.

10.8 What remains unestablished

Meta's actual load. The 300 megawatt figure is one reporter's characterisation, not a permitted or announced number. No TDEC air permit for the campus's backup generators could be located by search; the state's permit records sit behind an application that does not answer keyword queries.

Whether Meta is a GDE retail customer or takes service directly from TVA. No document settles it. The reasoning that GDE's total electric revenue makes a retail load of that order implausible is not run here, because the only load figure available is a reporter's characterisation that note 9 states must not be carried into a calculation.

Any TVA Board action naming Meta or Gallatin. None located. Board materials are not full-text indexed.

What generation the 500-kV towers are for. Nothing filed.

Each of these is answerable by a records request, and each is noted here as absent.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S^1] single source, [I] author inference.

1. Laura Baigert, *Proposed Tennessee Valley Authority Transmission Line to Service New Facebook Data Center and Economic Development in Gallatin Will Impact Hundreds of Residential Property Owners' Values and Raises Safety Concerns*, TENN. STAR, 20 Feb. 2021. URL live and body retrievable as of 16 Aug. 2026. **[S^1]** — a single outlet, and one with a declared political orientation. It is cited for what it published and when, which is the fact the chapter needs, rather than for its characterisation of the project.
2. Josh Cross, *Gallatin News*, 26 Feb. 2021. **[S^1, retrieval qualified]** — the article URL resolves but the body sits behind a hard paywall and was not read in rendered form during this research. The quotation reproduced here comes from an archival capture. Neither it nor Malinda Hunter's title as of February 2021 has been confirmed against the subscriber edition. The chapter's argument does not depend on this note: endnote 1 independently establishes that the Facebook connection was public and contemporaneous. **Open item, Appendix F §F.1.**
3. TVA, *Gallatin, Tennessee (North Gallatin)*, January 2021 text, surviving verbatim under "Background" in the capture of 16 Aug. 2026, `TVA_page_capture_north_gallatin_20260816.txt`, deposit 10.5281/zenodo.21959989. **[P]**
4. NewsChannel 5, 16 Feb. 2026; WSMV, 20 Feb. 2026; FOX 17, 19 Mar. 2026; *Gallatin News*, 26 Mar. 2026. All four read in full. **[P, negative]** — with one limit that should be stated: tennessean.com and bizjournals.com block automated retrieval, so the absence is established across the outlets that could be searched, not across all Tennessee media. **Open item, Appendix F §F.1.**

5. Meta and Tennessee Department of Economic and Community Development announcements, 12 Aug. 2020; TNECD release naming TVA as a recruiting partner. **[P]**
6. Sumner County property records, May 2020 conveyance to Woolhawk LLC; acreage and consideration as recorded. **[P]**
7. Gallatin Municipal Planning Commission minutes and site plans, May 2024 and Sept. 2025. **[P]**
8. Tennessee Lookout, data centre census, July 2026. **[S]**
9. WPLN, Nov. 2025. **[S[1]]** — a reporter's characterisation, not a permitted, metered or announced figure. Neither Meta nor TVA has published a load figure for the campus. The number should not be carried into any calculation.
10. Gallatin Department of Electricity, 2023 annual financial report. **[P]**
11. TVA press release, 21 Jan. 2021; project page update, Apr. 2021, giving the substation location. **[P]**
12. Adjacency of the substation location to Meta's stated address. **[I]** — the inference is the author's. TVA has not stated a relationship between the substation and the campus, and the chapter does not assert one.
13. TVA, *109 North* project page, May 2024 opening text and August 2026 update, capture 16 Aug. 2026, `TVA_page_capture_109_north_sumner_county_20260816.txt`. **[P]**
14. TVA environmental reviews index, Federal Register search, and the Gallatin Fossil Plant docket, Aug. 2026. **Bounded 17 Aug. 2026.** The "no categorical exclusion" limb of this negative predates the location of TVA's published determination lists (note 23). Those lists were searched for the 109 North transmission project, per note 25, and **not** for generation actions in Sumner County. Until that search is run the limb rests on the environmental reviews index, the Federal Register and the plant docket, which is what this note claims. Chapter 5 note 16 carries the same bound on the same sentence. **[P, negative] Open item, Appendix F §F.1.**
15. TVA, `GeneSIS_Layers` FeatureServer, layer 1, county query, retrieved 15 Aug. 2026, deposit 21959989. Snapshot dated 30 July 2025 by TVA. Sumner County: 15,441 parcels. **[P]**
16. Coverage of the Gregory family farm dispute, Feb.–Mar. 2026, as at note 4; petition signature count as reported. **[S]**
17. Route mileages and dates from the 109 North page captures, Nov. 2024 and Aug. 2026. **[P]**
18. Register computation from `TSSProjects_Hosted` route alternatives layer, `PROJECT_ID` 631204, retrieved 15 Aug. 2026, deposit 10.5281/zenodo.21959989; geodesic length, deduplication and method at Chapter 8 §8.2A and Appendix C. 32.4 miles of alternatives; no record in the selected centerline layer. Portfolio median ratio across the 46 projects that appear in both layers: 2.61. **[P]**
19. The 7.08 figure was an artifact of joining the two layers on `PROJECT_ID` without excluding nulls: `West TN Power System Improvements` (64.4 miles of alternatives, null identifier) was bucketed with the `109 North TN 161kV Delivery Point` centerline record (7.0 miles, null identifier). Full account at Chapter 8 note 22. That successive option sets accumulate in the layer remains the author's explanation and

not TVA's; `created_date` and `last_edited_date` are identical across the duplicate pairs examined, which is consistent with a repeated import rather than versioning. **[P for the correction; I for the accumulation]**

20. City of Gallatin council proceedings, June and July 2026; mayoral remarks as reported. **[S]**
21. Internet Archive captures of the North Gallatin page, Mar. 2021 – Apr. 2025, sixteen captures collapsing to three distinct body texts by digest. The diff chain is not in the deposit; Chapter 6 note 44 states the search, the query form and the non-deposit. **[P] Open item, Appendix F §F.1.**
22. TVA newsroom, Shelby County solar site release, quoting the 110-megawatt Facebook allocation. **[P]**
23. TVA, *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, and the eight documents linked from it, retrieved 17 Aug. 2026: FY2020 from 27 Apr. 813 records; FY2021 2,471; FY2022 2,154; FY2023 1,934; FY2024 1,872; FY2025 1,762; FY2026 Q1 399; FY2026 Q2 494; total 11,899. Retrieval route, the Cloudflare 403 and the silent-truncation caution are at Chapter 3 note 5; full account at `TVA_CE_Determination_Research_v0_1.md`. **[P]**
24. CEC 54972, "Highway 109 North Delivery Point Soil Borings," Sumner TN, business unit as listed, date closed 9/11/2025, CE applied 13, in the FY2025 list at note 23. Title quoted verbatim. The text of exclusion 13 is at 18 C.F.R. pt. 1318, subpt. C, app. A, item 13, quoted from the current eCFR text as at Chapter 3 note 10. Same record cited at Chapter 3 note 9. **[P]**
25. Absence established by searching all 11,899 records at note 23 for "109 North," "Highway 109," the Gallatin Department of Electricity substation name and every Sumner County row, and by checking TVA's environmental reviews index for an assessment or impact statement under each. The two North Gallatin determinations (CEC 42028 and 47568) belong to the separate project at §10.3 and are not this line. Route length, tower specification and easement-purchase timing from the page captures at notes 13 and 17. **[P, negative]**
26. FY2026 Q1 records zero CE 16 determinations against 26 in FY2025, the highest annual count in the series; the per-year tallies are at Chapter 3 §3.4 and note 12. Whether the zero is a publication lag or a genuine pause is **not established**, and it is cited here only for the proposition that the series lags. **[P for the counts; the explanation not established] Open item, Appendix F §F.1.**

Chapter 11 — Maury County

Verified 15 August 2026.

11.1 A line with a name and no page

TVA's project register carries a selected transmission centerline, project identifier 539168, running 1.1 miles at Spring Hill in Maury County.[1] Its name is:

```
Ultium — Night Sky
```

There is no TVA project page for it. There is no TVA environmental assessment, no finding of no significant impact, and no entry on TVA's environmental reviews index.[2]

There is a categorical exclusion determination. TVA publishes registers of completed categorical exclusion checklists, naming each project and the exclusion applied, in eight documents covering 27 April 2020 to 31 March 2026 — 11,899 records — and this line has one:[25]

> CEC **47184**, "Project Night Sky - TVA Ultium, TN 161kV Switching Station and Loop Line," Maury, TN, closed **11 August 2022**, **CE 16**.

Exclusion 16 is the one this volume is about: construction of new transmission line infrastructure, generally no more than ten miles, no more than 125 acres of new right of way. The line is 1.1 miles.

That row is the whole of TVA's published environmental record for this project. It establishes that TVA made a determination and the date it closed. It establishes nothing about what TVA considered, because TVA publishes the register of completed checklists and not the checklists themselves — there is no extraordinary-circumstances column anywhere in the 11,899 records, and no approving official is named on any of them.[26]

Two things follow, and they pull in opposite directions, which is why both are here. A TVA record of this line existed in public all along. And the record TVA published is a row in a table, closed in the same month that another agency published the environmental assessment describing the line, carrying the customer's private project name in its title and nothing a property owner in Spring Hill could have used.

The scope of the line still reaches the public through exactly **one independently published external document**, and it is there because a different agency's process required it rather than because TVA published it. Why that document exists is a matter of another agency's procedure, and this volume does not characterise TVA's intent. The line appears in more than one place in the public record: TVA's own published register carries the centerline, and TVA's published list of completed categorical exclusion checklists carries CEC 47184. Both are public. Neither is external to TVA, and neither describes the line to anyone who is not already looking for it. What no other body published, and what

the next section is about, is the description that exists only because a different agency had to write it down.

11.2 How it came to be published

Ultium Cells is the battery joint venture of General Motors and LG Energy Solution. Its Spring Hill plant sits beside the GM assembly complex in Maury County.[3] The Department of Energy's Loan Programs Office financed part of it, which made DOE a federal agency with an action to review, which triggered an environmental assessment, published in August 2022.[4]

Two federal agencies with overlapping undertakings have to settle which of them leads consultation under Section 106 of the National Historic Preservation Act.[5] That negotiation happened in correspondence, and the correspondence went into DOE's appendices.

The Tennessee Historical Commission wrote to DOE in July 2022:[6]

> "We appreciate the DOE's notification of lead federal agency status for the General Motors (Ultium) Battery Cell Manufacturing Facility. Further, we acknowledge that the DOE is in agreement with the Tennessee Valley Authority (TVA) regarding the TVA's status as lead federal agency for the construction of the **Ultium Night Sky 161-Kv Transmission Line**."

TVA wrote to DOE on 26 July 2022, over the signature of James W. Osborne, Jr., Manager of Cultural Compliance, copying the Commission. The letter confirms that TVA was the lead federal agency for the Section 106 process on the line, and that the Commission had already concurred with TVA's finding that the line would have no adverse effect on historic properties.[7]

The scope appears in the environmental assessment's cumulative impacts section:[8]

> "TVA Transmission Line Installation: A 1.1-mile transmission line to be installed by TVA to provide power to the project site. The transmission line would be located within the 13-acre utility corridor on the southwestern side of the project site."

The assessment gives a coordinate for the site: 35.723754, −86.969122.[9] TVA's own centerline extent covers 35.7200 to 35.7246 north, −86.9892 to −86.9734 west.[10] The plant coordinate sits inside that latitude band and about 390 metres east of the eastern end of the line, which is what a plant served from the west by a 1.1-mile line looks like. They are the same project.

TVA conducted a federal review of this line. It consulted a state agency, reached a finding, and documented it. None of that appears in any document TVA published. What TVA published is the row at §11.1: that exclusion 16 was applied, and the date it closed.[11]

11.3 Whose name it is

“Night Sky” was not TVA’s coinage. General Motors used it as the project’s internal name before TVA drew anything.[12]

Gresham Smith’s 2021 traffic study is titled *Traffic Impact Analysis: Project Night Sky, Spring Hill, Tennessee*.[13] The Tennessee Department of Transportation’s own impact analysis carries the same name. So do the archaeological and architectural survey reports prepared for the site.[14] Tennessee Historical Commission staff, writing to DOE on 15 June 2022, referred to “the construction of a new transmission line and substation for the Project Night Sky Project.”[15]

TVA adopted the customer’s private project name and used it to label the line in its own register.[16] Whatever else that is, it is not ambiguity about who the line was for.

11.4 The comparison that makes it an argument

Maury County holds both projects in TVA’s Tennessee portfolio where a private industrial customer appears in the file naming.[17]

	Fiberon	Ultium – Night Sky
County	Maury	Maury
Local power company	Columbia Power and Water Systems	Columbia Power and Water Systems
Voltage	161 kV	161 kV
Period	2022–23	2021–22
TVA project page	**yes, customer named in the title**	**none**
TVA environmental document	**none published**	**none published**
TVA categorical exclusion determination	**probable, not established** — CEC 54402, exclusion 16, 5 Jan 2026, titled for the Columbia Industrial Development Board rather than for Fiberon[27]	**CEC 47184, exclusion 16, closed 11 Aug 2022**

The local power company is confirmed twice for Ultium: by TVA’s chief executive in the state’s December 2022 announcement of the plant’s expansion, and by the permit table in DOE’s environmental assessment, which lists “Columbia Power & Water — Application for New Service — 5/04/2022.”[18]

Two industrial customers. One county. One distributor. One voltage class. Overlapping years. One of them received a public siting page that names the company in its title and describes what it will build. The other received nothing.

The difference is not explained by confidentiality. Ultium's Spring Hill plant was announced publicly, expanded publicly, and celebrated by the governor.[19] It is not explained by scale; the Ultium line is shorter and simpler than Fiberon's rebuild.[20] It is not explained by the absence of a federal process, because TVA ran one.

11.5 What Maury County looks like in TVA's other files

TVA's generation siting dataset, `GeneSIS_Layers`, records 151,858 Tennessee tax parcels intersecting its areas of interest across fourteen Middle Tennessee counties, at a study phase of "Initial Feasibility Processing," snapshot dated 30 July 2025.[21]

Maury County has the largest count of the fourteen: 21,989 parcels.[22]

The county with TVA's most extensive published generation siting footprint is the county where TVA built a transmission line it never announced, for a customer whose name it recorded and did not publish.

Neither fact explains the other. Both are TVA's own data.[23]

11.6 Where this leaves the reader

A property owner in Maury County who wanted to know why a transmission line was being built near Spring Hill in 2022 had no TVA page to read. There was no comment period, no open house, no preferred route announcement, no schedule table, and no environmental document to inspect.[24] The federal review that did occur produced a letter to a state agency, not a public notice. What it also produced — a row in a list of completed checklists, published eventually, naming the project and the exclusion applied — would have told that owner the review had happened and nothing whatever about what it found.

Nothing TVA sent anyone said the line existed. A reader who already knew to look could find it in TVA's published centerline layer and in the title of categorical exclusion 47184; a reader who did not had to read the appendices of a different agency's loan paperwork for a different project.

That is what a siting process looks like when nothing requires it to be visible.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. Turner, Tommy N. (2026). *TVA Transmission Siting GIS Capture, 15 August 2026* [Data set]. Version 1.0. Zenodo. https://doi.org/10.5281/zenodo.21959989. File `TVA_TSSProjects_L0_centerline_20260815.geojson`, 447 features, SHA-256 `2898370e8f998270834517dab9927ede84ad0bee7f8a3b89f89c83ca1af6fd0a`. Query

https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services/TSSProjects_Hosted/FeatureServer/0/query?where=1=1&outFields=*&f=geojson, retrieved 2026-08-15T14:10:59Z. The record: NAME = Ultium - Night Sky (the field value uses a hyphen; the chapter renders it with an en dash), PROJECT_ID 539168, WORKORDER 2T0KV1, SITING_ENGINEER Whittier, DESCRIPTION Transmission Line, SOURCE Siting, MILES 1.12020288. The query returns three byte-identical copies of it; deduplication leaves one. **[P]**

2. Negative finding. TVA's index of current transmission projects, retrieved 16 Aug 2026, carries no Maury County transmission entry other than Columbia (Fiberon). TVA's environmental reviews index, reviewed 15 Aug 2026, listed for Maury County only a Columbia Power and Water Systems water intake matter, which is unrelated. A search of tva.com returned no page and no document naming the line. **The search itself is under-documented:** the terms used, the number of results examined and the retrieval times are not recorded, and the volume's own standard requires a failed search to be described. TVA's lists of completed categorical exclusion checklists are not in the environmental reviews index and are not reachable by the site search this note describes. A determination exists and is at note 25. The negative that survives is confined to the project page, the assessment, the finding of no significant impact and the environmental reviews index. **[P, negative, as narrowed] Open item, Appendix F §F.1.**
3. U.S. Dep't of Energy, Loan Programs Office – Advanced Technology Vehicles Manufacturing, *Environmental Assessment: Spring Hill, TN Battery Cell Manufacturing Plant; Lordstown, OH Battery Cell Manufacturing Plant*, **DOE/EA-2189** (Aug. 2022), 182 pp., https://www.energy.gov/sites/default/files/2022-08/LPO_Ultium_Lordstown-SpringHill_EA_FONSI_August2022.pdf, indexed at https://www.energy.gov/nepa/doeea-2189-ultium-cells-battery-manufacturing-facilities-spring-hill-tn-and-lordstown-oh. Appendix A is permits and approvals; **Appendix B is "Consultation with Agencies, Indian Tribes, and Interested Parties," beginning at PDF p. 41**, and is the appendix relied on at notes 6, 7, 14 and 15; Appendix C is the executed Memorandum of Agreement of 4 Aug. 2022 among Ultium, DOE-LPO and the Tennessee Historical Commission. The appendix pages are not separately numbered, so locators in this chapter are given as PDF pages of 182. **[P]**
4. Ibid. **[P]**
5. 54 U.S.C. § 306108 (2024); 36 C.F.R. § 800.2(a)(2) (2026) (designation of a lead federal agency where more than one agency is involved in an undertaking). The authoritative text has not been consulted; both provisions are cited from secondary compilations. **[P] Open item, Appendix F §F.1.**
6. Tennessee Historical Commission, State Historic Preservation Office, to Mr. Todd Stribley, Department of Energy, re project no. SHPO0001127, reproduced in the environmental assessment at note 3, Appendix B, at PDF p. 96 of 182. **Date, precisely.** The letter itself is timestamped 2022-07-08 08:31:54 CDT and was transmitted to DOE by email on 27 July 2022; "July 2022" in the text covers both and neither should be given alone without saying which. The response names Casey Lee as its drafter. Bold

emphasis in the quoted passage is the author's; the capitalisation of "161-Kv" is the Commission's. **[P]**

7. The letter is not addressed to the Tennessee Historical Commission. It is Tenn. Valley Auth. (400 West Summit Hill Drive, Knoxville) **to Todd Stribley, Director, Environmental Compliance, U.S. Department of Energy Loan Programs Office**, 26 July 2022, over the signature of James W. Osborne, Jr., Manager, Cultural Compliance, with a copy to Ms. Casey Lee at the Tennessee Historical Commission; reproduced in the same appendix at PDF p. 101 of 182. It is expressly a response to DOE's letter of 7 June 2022, not to the Commission's letter, which post-dates it. Its subject line is "Federal Undertakings by the U.S. Department of Energy (DOE), Lithium-Ion Battery Cell Manufacturing Facility in Spring Hill, Tennessee; and the Tennessee Valley Authority (TVA) for a Transmission Line (TL) to the Facility (TVA Tracking – CRMS 24671291490, Project#: SHPO0001148)" — which supplies TVA's own internal tracking number for the line, the only TVA-side identifier for it in the correspondence. The letter states that "TVA is the lead Federal agency for the Section 106 process for construction of a TL to the manufacturing facility" and that "Tennessee Historical Commission (THC) concurred with TVA's findings that the proposed TL construction would have no adverse effects to historic properties." **[P]**
8. Environmental assessment at note 3, cumulative impacts section, at printed p. 26 (PDF p. 32 of 182), bullet "TVA Transmission Line Installation." The 13-acre utility corridor is described independently in the same document at printed pp. 4 and 7 (PDF pp. 10 and 13) as one component of the 274-acre limits-of-disturbance area. **[P]**
9. Ibid., site coordinate. **[P]**
10. Extent of the `Ultium - Night Sky` geometry in the archived layer-0 file at note 1, computed from the GeoJSON coordinate array: 35.7200131 to 35.7246322 north, −86.9891790 to −86.9734060 west. The environmental assessment's coordinate is *not* inside that extent. Its latitude falls within the range but its longitude, −86.969122, lies about 390 metres east of the eastern end of the centerline, which is what one would expect of a plant site served from the west by a 1.1-mile line. The reading that the two describe the same place is sound at the scale of the line; the statement that the point sits inside the extent, carried from `TVA_Unpublished_Projects_Research_v0_1.md`, is not. **[P for the extent; I for the identification]**
11. Negative; see note 2. The substance of the federal review is documented only in the correspondence at notes 6 and 7, in another agency's appendices; TVA's own published record of it is the single register row at note 25. **[P, negative]**
12. **[I]** — that the name preceded TVA follows from the 2021 date of the Gresham Smith study at note 13 set against TVA's 2022 correspondence and its register entry. No document states the order of adoption.
13. *Traffic Impact Analysis: Project Night Sky, Spring Hill, Tennessee*, Nov. 2021, cited in the environmental assessment at note 3, printed p. 22 n.17. **One attribution point.** The EA gives the author as General Motors, LLC and Gresham Smith as the preparer — "General Motors, LLC. 2021. Traffic Impact Analysis: Project Night Sky, Spring Hill, Tennessee. Prepared by Gresham Smith. November." The text calls it "Gresham Smith's 2021 traffic study," which is how the firm is credited but not how the document is

authored; either is defensible so long as the note says which. The report itself was not obtained. **[P for the title, date and preparer as cited in the EA; the underlying document not seen] Open item, Appendix F §F.1.**

14. *TDOT:* Tenn. Dep't of Transp., *Transportation Impact Analysis for the S.I.A Road Service Project Night Sky*, Strategic Transportation Investments Division, 2 June 2021, cited in the environmental assessment at note 3, printed p. 22 n.16. *Survey reports:* the same environmental assessment, Appendix B, at PDF pp. 57, 61 and 65 of 182, lists the documents DOE reviewed to identify historic properties, among them "Architectural Survey Report: Project Night Sky, City of Spring Hill, Maury County, Tennessee, dated June 21, 2021" and "Phase I Archaeological Report for Project Night Sky, Maury County, Tennessee, dated June 2021," together with Addendum I of Nov. 2021 and Addenda II and III. **The reports themselves were not obtained** — they are named in the EA, not reproduced in it — so what is established is that documents bearing those titles and dates existed and were reviewed by DOE, which is all the text claims. **[P] Open item, Appendix F §F.1.**
15. Casey Lee, Historic Preservation Specialist, Section 106, Tennessee Historical Commission, State Historic Preservation Office, email to Todd Stribley, U.S. Department of Energy, Wednesday, 15 June 2022, 9:20:41 a.m., subject "RE: Ultium Final MOA for Signature," reproduced in the environmental assessment at note 3, Appendix B, at PDF p. 93 of 182. The passage in full: "We recently received an undertaking from the TVA regarding the construction of a new transmission line and substation for the Project Night Sky Project. Based on guidance we have received from the ACHP in the past, the undertakings are linked, and therefore if the federal agencies do not agree to designate one as lead for each undertaking, then they need to separately consider the cumulative effects of the connected undertakings." Two points worth carrying. The item is an **email**, not a letter, which is why it was not on the verified list with the July letter; Appendix B reproduces email threads and formal correspondence together and in reverse-chronological runs, so items do not appear in date order. And the sentence is the origin of the whole lead-agency exchange: it is the state historic preservation office, not either federal agency, that first put on the record that a TVA transmission line was a connected undertaking to the battery plant. **[P]**
16. **[I]** — the characterisation is the author's, drawn from the sequence at notes 12 and 13 and the register value at note 1. TVA has not stated how the label was chosen.
17. TVA ArcGIS Online organisation enumeration, 15 Aug 2026, recorded in `TVA_Org_Enumeration_v0_1.md` and in `TVA_AGOL_items_20260815.json`, deposit 10.5281/zenodo.21959989. Seven services carry the Fiberon name — `Fiberon_Affected_Parcels`, `Fiberon_Double_Clircuit_Rebuild_L2522`, `Fiberon_L2522_Reroute`, `Fiberon_Substation`, `Fiberon_Transmission_Structures`, `FiberonTransmission_Lines`, `Fiberson_16kV_Tap`, spellings verbatim — and the layer-0 record at note 1 carries the Ultium name. Table rows: county, local power company and voltage from the Fiberon page capture `TVA_page_capture_columbia_fiberon_20260816.txt` in the same deposit and from notes 1, 6 and 18; the TVA project page and environmental document rows from note 2. Two qualifications. The restriction to a *private industrial* customer is the author's classification, and it is what distinguishes this pair from

Facebook_North_Gallatin_Alternative_Transmission_Line_Route, a Sumner County service in the same organisation and one of 302. The period row — 2022–23 and 2021–22 — is a characterisation drawn from the Fiberon page's July 2023 update stamp and from the Ultium documents of 2021 and 2022; neither is a stated project start date. **[P for the service names and the page text; I for the classification and the period row]**

18. Tennessee Department of Economic and Community Development release, 2 Dec. 2022, quoting TVA's chief executive; environmental assessment at note 3, permit table entry "Columbia Power & Water — Application for New Service — 5/04/2022." **[P]**
19. TNECD release, 2 Dec. 2022, announcing the expansion. The attribution of public celebration to the Governor, and the original announcement of the Spring Hill plant, are not separately sourced. **[P for the expansion; unsourced for the Governor's remarks and the original announcement] Open item, Appendix F §F.1.**
20. The 1.1-mile Ultium scope at notes 1 and 8 against the Fiberon scope at TVA_page_capture_columbia_fiberon_20260816.txt, deposit 10.5281/zenodo.21959989: a new line from TVA's Maury–Mt. Pleasant 161-kV line to the West Columbia–Mt. Pleasant 46-kV line and on to the new Fiberon substation, with rebuild and reroute portions and two switches on the Maury–Mt. Pleasant line. The judgement that one is simpler than the other is the author's. **[P for the descriptions; I for the comparison]**
21. TVA, GeneSIS_Layers FeatureServer, owner mbeierle0@tva.gov_tva, layer 1 (AOI Intersected Tax Parcels). returnCountOnly and distinct (CNTYNAME, STNAME) queries, retrieved 15 Aug 2026: 151,858 parcels across fourteen Tennessee counties, STUDYPHASE holding the single value "Initial Feasibility Processing," service description dated 202507301441. Layer metadata is in deposit 10.5281/zenodo.21959989; **the feature records were deliberately not captured**, because every record carries OWNNAME, MAILADD and SITEADD. See gis_archive_20260815/MANIFEST.txt, "NOT captured, deliberately." **[P] Open item, Appendix F §F.1.**
22. Per-county returnCountOnly queries on CNTYNAME, layer 1, 15 Aug 2026: Maury 21,989, the largest of the fourteen, against Sumner 15,441 and Cheatham 10,601. COUNTY and STATE are null throughout the layer; the populated fields are CNTYNAME and STNAME, and a query against the empty field returns zero. **[P]**
23. **[I]** The two facts are set side by side and no causal reading is asserted.
24. Negative; see notes 2 and 11, as narrowed by note 25. **[P, negative]**
25. CEC 47184, "Project Night Sky - TVA Ultium, TN 161kV Switching Station and Loop Line," Maury, TN, business unit Electric System Projects, date closed 8/11/2022, CE applied 16, in TVA's list of completed categorical exclusion checklists for FY2022. TVA, *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, and the eight documents linked from it, 27 Apr. 2020 – 31 Mar. 2026, 11,899 records, retrieved 17 Aug. 2026. Title quoted verbatim including TVA's spacing and its "161kV." The retrieval route, the Cloudflare 403 on www.tva.com, the Azure CDN origin, the Internet Archive recovery of the FY2021 list

and the silent-truncation caution are set out at Chapter 3 note 5; the per-project table is at `TVA_CE_Determination_Research_v0_1.md`, whose counts were independently re-derived by a second researcher. Text of exclusion 16 at 18 C.F.R. pt. 1318, subpt. C, app. A, item 16. Chapter 6 note 64 cites the same row for the naming point. **[P]**

26. Chapter 3 §3.3 and notes 10–11: the eight documents carry seven columns and no extraordinary-circumstances field, name a single NEPA specialist as a general contact rather than an approving official for any determination, and publish the register of completed checklists rather than the checklists. A sweep of all rows and all front matter for *extraordinar*, *approving*, *official*, *signat* and *concurr* returns no column and no field. **[P, negative]**
27. CEC 54402, "Columbia-Mt. Pleasant 46-kV Transmission Line (L2522) Reroute for Columbia Industrial Development Board (IDB)," Maury, TN, date closed 1/5/2026, CE applied 16, in the FY2026 Q2 list at note 25. **This is not established as the Fiberon determination and the table row says so.** The match rests on route and customer type: the Fiberon page describes a connection to the West Columbia–Mt. Pleasant 46-kV line for an industrial customer, and the reroute of L2522 for an industrial development board in Columbia is the same work as far as the public record shows. Against it, TVA's own title names the Columbia Industrial Development Board and not Fiberon, and **the string "Fiberon" appears nowhere in the 11,899 records**, a negative independently confirmed. Treat as probable and unconfirmed; it is resolvable by one sentence from TVA NEPA Compliance and is on the companion guide at T2. **[P for the row and for the absence of "Fiberon"; the identification is not established] Open item, Appendix F §F.1.**

Chapter 12 — Cheatham and Robertson

Verified 15 August 2026; four sources captured 24 August 2026.

12.1 Ten dollars

In August 2024 the United States of America, on behalf of the Tennessee Valley Authority, filed thirty-six pages in the Middle District of Tennessee seeking temporary access to two families' land.[1] The complaint states its authority and its purpose:[2]

> "The authority for the taking is the Tennessee Valley Authority Act of 1933, as amended, 16 U.S.C. §§ 831 et seq.
>
> The public use for which the temporary property right is taken is the conducting of surveys, core drilling, environmental studies, appraisals, title investigations, and related activities for the acquisition of an easement and right-of-way for the erection, operation, and maintenance of electric power transmission circuits and communication circuits."

The newspaper reports that the filed papers put the figure at **$10**, quoting the words "the amount estimated by the Tennessee Valley Authority to be compensation for the temporary right taken."[3] Which filed document carried that language is not established by anything this volume has read; the statutory home for such an estimate is the declaration of taking. The complaint states no figure; under 40 U.S.C. § 3114(a)(5) the estimate belongs in the declaration, and the companion guide §7 records that the complaint in a parallel Cheatham filing was retrieved and read and contains none.

An ex parte motion for immediate possession was granted on 26 August 2024. The landowners had twenty-one days to respond.[4]

TVA's spokesman explained that all but two owners had consented, so TVA asked the court for the remaining two.[5] He also drew a distinction that is the subject of this chapter:[6]

> "this is related to the proposed transmission lines and has nothing to do with the required environmental impact statement needed to be completed before the project can be moved forward."

The environmental impact statement was never completed. The transmission project outlived it.[7]

12.2 The project

Middle Tennessee Generation & Transmission Capacity Expansion, project 543225 in TVA's register, is the third-largest network of studied route alternatives in TVA's entire seven-state portfolio: **88.8 miles across 57 segments.** Only two Mississippi projects are larger.[8]

Its public page describes a two-phase build.[9]

Phase 1: 3.08 miles of 161-kV line on 100-foot new right of way, H-frame steel structures, beginning on the West Nashville–Clarksville line north of Sweethome Road and ending at "TVA's Cheatham County Substation located at the proposed Cheatham County Natural Gas Generation Facility on Lockertsville Road."[10]

Phase 2 loops two existing lines. Line 5810, Montgomery–Springfield: 14 to 17 miles, 32 alternative segments, 112 possible routes, connecting at the Coopertown Metering Station. Line 5689, Davidson–West Nashville: 15 to 17 miles, 18 segments, 24 routes. Stated completion "no earlier than 2029."[11]

The page carries one update stamp: **April 2024**.[12]

12.3 The review that was never published

The page states where its environmental review would live:[13]

> "NEPA review for this project will be incorporated into the Cheatham County Generation Site Environmental Impact Statement (EIS), which can be found at the Cheatham County Generation Site once it is available."

That environmental impact statement does not exist.[14]

The Federal Register carries three entries for it, all in 2023: a notice of intent published 19 May, and two successive extensions of its scoping comment period, published 20 June and 30 June.[15] Through August 2026 there is no draft, no final, no record of decision, no finding of no significant impact, and no withdrawal. No Federal Register document of any kind uses the transmission project's name.[16]

The generation project the review was attached to was a 900 megawatt simple-cycle combustion turbine plant with battery storage, on TVA-owned land in Cheatham County, intended to replace part of the capacity lost when the second unit at Cumberland Fossil Plant retires at the end of 2028.[17]

That retirement is no longer fixed. In July 2025 the Associated Press reported that Cumberland Unit 2, "which had been planned for retirement in 2028," is "now among the coal units being evaluated for potentially longer life."[43] The end-2028 date is what TVA noticed in 2023, and this chapter reports it as such.

The consequence runs the length of the chapter. A generation project was justified by a retirement, a transmission project was justified by the generation project, and land was taken to survey for the transmission project. The site has since ceased to be TVA's preferred alternative for the generation project. The retirement that started the chain may not happen. What remains is the eighty-eight miles of studied corridor, the two families whose land was entered, and a page that has not been updated since April 2024.

TVA moved the site out of preferred status in July 2025. From its generation project page:[18]

> “Based upon feedback received during TVA’s public scoping process and listening sessions with the Board of Directors, TVA is exploring alternatives to the 900-megawatt simple cycle combustion project proposed for Cheatham County. With input from the TVA Board of Directors, the site off Lockertsville Road is no longer TVA’s preferred alternative.”

The Board lacked a quorum at the time — three members sitting of nine, against a statutory quorum of five — so no siting decision was formally voted.[19] The reversal was announced as a stakeholder communication and a webpage edit.[20]

12.4 What is left

Thirteen months later, the transmission page has not been touched. It still carries the April 2024 stamp.[21] It still describes its terminus as the proposed Cheatham County Natural Gas Generation Facility, which TVA’s separate generation page says is no longer sited there. Its stated NEPA vehicle was cancelled before publication.[22]

The project record in TVA’s register is live.[23]

The page is also absent from TVA’s own index of current transmission projects. It sits at a URL one directory level away from every other project page, as a child of the index that the index does not link to. A member of the public working through TVA’s list of forty projects will not find it.[24]

So the position in August 2026 is: an 88.8-mile network of studied alternatives, a live register entry, a page nobody navigating the site will reach, describing a destination that no longer exists, with no environmental review path at all.[25]

The last of those was an inference from the page until August 2026, and it can now be checked against TVA’s own record. TVA publishes registers of completed categorical exclusion checklists — eight documents, 27 April 2020 to 31 March 2026, 11,899 rows, each naming a project and the exclusion applied. **This project appears in none of them.**[42] So the position is not that TVA excluded these 88.8 miles from review quietly. It is that TVA has neither excluded them nor assessed them: the vehicle it named was cancelled, and nothing has been substituted on any published record.

Whether TVA still intends to build the lines is not stated anywhere. No reporting in 2026 addresses it either way.[26]

12.5 Segmentation, described by the person it was done to

Preserve Cheatham County formed in 2023 to oppose the gas plant. Its founding member Tracy O’Neill described the structure of what she was opposing:[27]

> “As far as we’re concerned, the TVA has failed to prove the need and purpose for the gas plant itself. The transmission lines have been intentionally segmented

> from this project to continue the opaqueness and lack of transparency that we've received from the TVA from the very beginning."
>
> "The transmission lines are a separate project from the gas plant and all that does is reduce the public input and public knowledge of everything that's associated with this gas plant. You've got TVA who proposed this methane gas plant, and then you're going to have a separate project for however many miles of pipelines, which is going to be operated by a completely different entity, and then the transmission lines, which is again a completely separate project."

She also dates the disclosure:[28]

> "The gas plant itself specifically states in the scoping documents that were released back in November of last year… that was the first notice that we had that TVA was going to be requiring an additional 30 to 45 miles of new transmission lines, which is a new right of way, a 100-foot right of way because it's 50 feet on either side of the transmission line."

TVA's own scoping report gives thirty-five to forty-five miles, disclosed for the first time in a scoping document for a different project.[29]

TVA's spokesman, in the same article, confirmed the separation as ordinary practice.[30] He was not conceding anything. The distinction between the transmission project and the generation review is simply how the work is organised, and it is why the survey access proceeded while the environmental impact statement did not.[31]

One party calls it segmentation. The other calls it two projects. The record supports both descriptions of the same arrangement.[32]

12.6 A third party still holding the land

Tennessee Gas Pipeline, a partner on the original project, had active lawsuits against at least eighteen landowners in the area as of July 2025, after the site ceased to be TVA's preferred alternative. The company declined to say whether it would drop them.[33]

TVA acquired land and began preliminary infrastructure work before the reversal. What it intends to do with that land has not been stated.[34]

12.7 What is not in these counties

No data centre in Cheatham, Robertson, Dickson or northern Davidson County has been located. **The search behind that sentence is not documented** — no terms, date range, sources or result count are on record — so it is stated here as an absence this volume has not established rather than as a searched negative.[35] This chapter makes no claim that one is coming.

What has happened is regulation in advance of one. Cedar Hill, in Robertson County, adopted a two-year moratorium on data centres and cryptocurrency mining in June 2026.[36] Its mayor, John Edwards, told WSMV that there were no proposals to build a data centre in Cedar Hill, and that he had taken the idea from watching neighbours across the state line in Franklin, Kentucky, fight a proposal for three 200,000-square-foot data centres.[37]

Cheatham County added "data center" to its zoning resolution on 2 February 2026, by Resolution #5, defining it as "a facility used to house computer systems, associated components, and related infrastructure for the storage, processing, or distribution of data, typically including backup power, cooling systems, battery storage, substations and security systems," and adding it to the list of Extensive Impact Facilities alongside "Electricity Generating Facilities and Transmission Lines."[38] The amendment was drafted and pressed on the county not by its own lawyer but by Bill Herbert, a private attorney who had represented Cheatham County homeowners against the TVA plant. He gave its purpose:[39]

> "The purpose of this legislation is to plan for the future. So that when a data center comes to Cheatham County, we already have zoning in place that regulates where it can be located."

Future tense, no application pending.

TVA's generation siting dataset includes both counties among its fourteen. Cheatham accounts for 10,601 parcels at initial feasibility as of July 2025. Robertson is in the set.[40]

A city and a county legislating for a use neither has an application for, in counties where a federal corporation is evaluating generation sites and has a network of studied transmission alternatives drawn, on a page nobody can find, with no environmental review.[41]

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S¹] single source, [I] author inference.

1. *Cheatham County Exchange* (Main Street Media of Tennessee), Sharon Alice Lurie, 10 Sep. 2024, reporting complaints filed by the United States on behalf of TVA in the U.S. District Court for the Middle District of Tennessee in August 2024. The condemnation authority is 16 U.S.C. § 831c(h), (i) (2024). **The docket has not been pulled.** No case number is recorded anywhere in this volume's files; Chapter 2 note 22 gives the filing date as 20 Aug. 2024; note 24 there names Judge Aleta Trauger, also on this article's authority. The thirty-six-page extent of the filing and the count of two landowner families rest on the same single article and have not been checked against the docket. **[S¹] Open item, Appendix F §F.1.**

2. Ibid., quoting the complaint. The authority clause quotes the Tennessee Valley Authority Act of 1933, 16 U.S.C. §§ 831–831ee (2024); the powers exercised are at § 831c(h) (eminent domain, title taken in the name of the United States) and § 831c(i)

(acquisition of real estate for transmission lines, and condemnation where an owner fails and refuses to sell at a price the Board deems fair and reasonable). The quoted text is the newspaper's transcription; the filed document has not been read. **[S¹] Open item, Appendix F §F.1.**

3. **The ten-dollar figure.** *Cheatham County Exchange*, 10 Sep. 2024. **The figure rests entirely on one newspaper's quotation of a filed document, the volume cannot say which filed document, the docket has not been pulled and no filing has been read.** Nothing in this chapter should be taken as a citation to the filing itself. The volume's citation standard forbids citing a document not read in its authoritative text, and this is one of the citations carrying that flag; the case is on PACER in M.D. Tenn. and the companion guide §7 sets out the retrieval route. Single-outlet reporting of a document nobody has retrieved is graded **[S¹]**, and the two chapters now agree. **[S¹] Open item, Appendix F §F.1.**

4. Ibid.: ex parte motion for immediate possession granted 26 Aug. 2024, twenty-one days allowed for response. Same single-source and unpulled-docket qualification as note 3. The federal framework within which such an order issues is the Declaration of Taking Act, 40 U.S.C. §§ 3114–3115, 3118 (2024): § 3114(a)–(b) vests title and the right to possession in the United States on the filing of a declaration and the deposit of the estimated compensation; § 3114(d) empowers the court to fix the time within which possession is surrendered; § 3115 makes the Government's obligation to pay the ultimate award irrevocable; § 3118 governs recording of the final judgment. **Which route TVA in fact took here — a declaration of taking, or a complaint in condemnation under 16 U.S.C. § 831c(i) with a separate motion for immediate possession — is not established, because the docket has not been pulled.** The statutes are cited as the framework, not as a description of this filing. **[S¹] for the order; [P] for the statutes Open item, Appendix F §F.1.**

5. *Cheatham County Exchange*, 10 Sep. 2024, quoting Scott Brooks, TVA Media Relations. That all owners but two had consented is Brooks's account, reported by one outlet and corroborated by no record consulted. Brooks is not named in this chapter's text; he is named in Chapter 2 note 27. **[S¹]**

6. Ibid. **[S¹]**

7. See notes 15 and 16 for the Federal Register record and note 23 for the project's continuing register entry. That the transmission project "outlived" the environmental impact statement is the author's characterisation of the two records set side by side. **[P, negative] for the absence of the statement; [I] for the characterisation**

8. Turner, Tommy N. (2026). *TVA Transmission Siting GIS Capture, 15 August 2026* [Data set]. Version 1.0. Zenodo. https://doi.org/10.5281/zenodo.21959989. Files `TVA_TSSProjects_L5_alternatives_p1_20260815.geojson` (2,000 features, SHA-256 `d9680cf1121d1a29ef058645d566b67e7adec8e08042dea4b6b3a98f0a6c59d4`) and `TVA_TSSProjects_L5_alternatives_p2_20260815.geojson` (645 features,

SHA-256 51837a7828255e6da505ecfa073285da940664602c0a3f21c3f8c2912d1b1393), layer 5 of TSSProjects_Hosted; queries .../TSSProjects_Hosted/FeatureServer/5/query?where=1=1&outFields=*&f=geojson&resultRecordCount=2000&resultOffset=0 and the same with resultOffset=2000, retrieved 2026-08-15T14:10:59Z. Records where PROJECT_NAME = 'Middle Tennessee Generation & Transmission Capacity Expansion', PROJECT_ID 543225, deduplicated on the key stated at Chapter 8 note 8 and measured as Vincenty geodesic length per Chapter 8 §8.2A: 57 segments, 88.8 miles. Rank and the two larger networks — Red Hills–Leake, MS at 103.9 miles and West Batesville–North Oakland, MS at 95.1 — from the per-project sums at Chapter 8 note 13. **[P]**

9. TVA, *Middle Tennessee Generation and Transmission Capacity Expansion Project (Cheatham and Robertson Counties)*, https://www.tva.com/energy/transmission/transmission-system-projects/middle-tennessee-generation-and-transmission-capacity-expansion-project-(cheatham-and-robertson-counties), capture of 16 Aug. 2026, TVA_page_capture_middle_tennessee_gt_20260816.txt, deposit 10.5281/zenodo.21959989. **No Internet Archive capture of this page has been checked** — the source register §3 lists it as "not yet checked" — and the Internet Archive declined to archive tva.com on 16 Aug. 2026. The deposited capture is the only copy of this page not held on TVA's own servers. **[P] Open item, Appendix F §F.1.**

10. Ibid., "Update – April 2024" and "Background": the selected Phase 1 route is 3.08 miles from the existing West Nashville–Clarksville 161-kV line (Line 5162) north of Sweethome Road to the Cheatham County Substation, centred on new 100-foot right of way, double-pole (H-frame) steel structures with potential for steel towers in mountainous areas. The Background section describes the Phase 1 loop as 2.5 to 3.5 miles across 5 alternative segments and 3 alternative routes; 3.08 miles is the route selected (Route No. 1, Loop Point No. 1 and Segment Nos. 33 and 37). **[P]**

11. Ibid., "Background": Line 5810 (Montgomery–Springfield) 14 to 17 miles, 32 alternative segments, 112 alternative routes, alternative loop connection at the Coopertown Metering Station; Line 5689 (Davidson–West Nashville) 15 to 17 miles, 18 alternative segments, 24 alternative routes. "No earlier than 2029" is the page's tentative completion date for Phase 2; Phase 1 is given as no earlier than 2028, and the schedule table repeats both. **[P]**

12. Ibid. The only dated update block on the page is "Update – April 2024," against a retrieval date of 16 Aug. 2026. **[P]**

13. Ibid., "Environmental Reviews." **Transcription check:** the page reads "The NEPA review for this project will be incorporated into the Cheatham County Generation Site Environmental Impact Statement (EIS), which can be found at the Cheatham County Generation Site once it is available." The quotation in the text drops the opening definite article. **[P]**

14. See notes 15 and 16. **[P, negative]**

15. **The three 2023 Federal Register entries, identified. Count confirmed at three.** All three carry the same caption, "Cheatham County Generation Site Environmental Impact Statement," and all three were issued by the Tennessee Valley Authority: (i) notice of intent, 88 Fed. Reg. 32,267–69 (May 19, 2023) (doc. no. 2023-10651), opening a 30-day scoping comment period closing 20 June 2023; (ii) notice of intent; extension of comment period, 88 Fed. Reg. 39,903 (June 20, 2023) (doc. no. 2023-13116), extending it seven days to 27 June; (iii) notice of intent; second extension of comment period, 88 Fed. Reg. 42,416–17 (June 30, 2023) (doc. no. 2023-13963), extending it again to 7 July. Retrieved 17 Aug. 2026 from federalregister.gov by full-text query on the exact phrase `"Cheatham County Generation Site"` against the Federal Register API endpoint `/api/v1/documents.json`, no date filter, ordered oldest first: the query returns `count: 3` and no others, in any year. **[P]**

16. Negative finding. Through August 2026 no draft environmental impact statement, final statement, record of decision, finding of no significant impact or withdrawal notice for the Cheatham County Generation Site has appeared in the Federal Register, and no Federal Register document of any kind uses the transmission project's name. Three queries were run against the Federal Register API on 17 Aug. 2026 and each is reproducible: (a) `conditions[term]="Cheatham County Generation Site"`, no date filter — 3 results, being the three notices at note 15, all published in 2023, all of them notices of intent or extensions of the scoping comment period, and none of them a draft, a final, a record of decision, a finding of no significant impact or a withdrawal; (b) `conditions[agencies]=tennessee-valley-authority` with `conditions[publication_date][gte]=2023-01-01` and `[lte]=2026-08-16` — 74 results, the complete TVA docket for the period, in which the only Cheatham documents are the same three and the most recent Cheatham document of any kind is 30 June 2023; (c) `conditions[term]="Middle Tennessee Generation & Transmission"` and the unquoted variants `Middle Tennessee Generation` and `Capacity Expansion Project Cheatham`, restricted to TVA — 0 results on the exact project name, and the nine hits on the loose variant are unrelated documents (New Caledonia, Allen, Chatuge, Cumberland, Gallatin, two 500-kV Middle Tennessee statements from 2001 and 2005, the 2011 Integrated Resource Plan, and a 2001 Duck River notice). **The transmission project's name appears nowhere in the Federal Register. [P, negative]**

17. TVA, *Cheatham County Generation Site Environmental Impact Statement*, 88 Fed. Reg. 32,267 (May 19, 2023) (notice of intent): TVA "intends to prepare an Environmental Impact Statement (EIS) to address the potential environmental impacts associated with the proposed construction and operation of a simple cycle Combustion Turbine (CT) plant and Battery Energy Storage System (BESS) on a parcel of TVA-owned land in Cheatham County, Tennessee. The Cheatham County Generation Site (CHG) would generate approximately 900 Megawatts (MW) and replace generation capacity for a portion of the Cumberland Fossil Plant (CUF) second unit retirement planned by the end of 2028." Every element of the sentence in the text — 900 megawatts, simple

cycle, combustion turbine, battery storage, TVA-owned land, Cheatham County, replacement for part of the capacity lost to Cumberland Unit 2, retirement by the end of 2028 — is on the face of that notice. **Detail not carried in the text:** the notice specifies that the plant would be "composed of multiple natural gas-fired frame CTs and natural gas-fired and oil-fired (i.e., dual-fuel) Aeroderivative CTs," so the fuel arrangement was not purely gas. **Contradiction to carry forward:** the 2028 Cumberland retirement is what TVA noticed in 2023, not a fixed fact. The Associated Press reported on 17 July 2025 (note 19) that power from the Cheatham plant "was intended to replace some of the electricity from the second unit of the coal-fired Cumberland Fossil Plant, which had been planned for retirement in 2028 but is now among the coal units being evaluated for potentially longer life." If Cumberland Unit 2 does not retire on schedule, the stated purpose of the whole generation-and-transmission programme moves under the chapter's feet. **[P]**

18. **Retrieved 24 Aug. 2026.** TVA, *Cheatham County Proposed Generation Project*, `tva.com/energy/our-power-system/cheatham`, under the heading "Project Update"; both quoted sentences verified word for word on that date. **[P]**

19. The rule is statutory: "Five of the members of the Board shall constitute a quorum for the transaction of business," 16 U.S.C. § 831a(e)(1) (2024), against a nine-member Board under § 831a(a); § 831a(e)(2) adds that "[a] vacancy on the Board shall not impair the power of the Board to act," which is why the sentence in the text is confined to the absence of a formal vote and does not say the Board was powerless. The composition at the time is from the wire report of the reversal: Jonathan Mattise (Associated Press), "Federal utility backs off Tennessee gas plant site after John Rich says he enlisted Trump's help," 17 July 2025, carried by WPLN News (Nashville Public Radio), https://wpln.org/post/federal-utility-backs-off-tennessee-gas-plant-site-after-john-rich-says-he-enlisted-trumps-help/ — "The board normally has nine members and requires five to make a quorum. It currently has three," the vacancies following the President's removal of three Biden appointees, and "Any final decision on the plant would need to await the installation of more TVA board members." **This is one wire report, not several.** It ran in Citizen Tribune, MarketBeat and other outlets, but that is syndication of the same AP copy and does not corroborate it. **Tension to hold in view:** TVA's own statement at note 18 says the site was dropped "[w]ith input from the TVA Board of Directors." Input from a Board that cannot transact business is not a vote, which is the distinction the sentence draws; but no Board record has been located either way, and note 20 records that no search for minutes is on file. **[P] for the quorum rule; [S[1]] for the three-member composition and the absence of a decision Open item, Appendix F §F.1.**

20. That the reversal was "announced as a stakeholder communication and a webpage edit" is the author's characterisation of the two records at notes 18 and 19. No TVA Board resolution or minute on the Cheatham site has been located, and no search for one is on record; the companion guide, request T5 is the instrument. **[I] Open item, Appendix F §F.1.**

21. Page capture at note 9: the sole update stamp is April 2024 against a retrieval date of 16 Aug. 2026. “Thirteen months” is measured from the July 2025 decision at note 18, whose exact date is not established. **[P] for the stamp; [I] for the interval Open item, Appendix F §F.1.**

22. Page capture at note 9, “Update – April 2024”: the stated terminus is “TVA’s Cheatham County Substation located at the proposed Cheatham County Natural Gas Generation Facility on Lockertsville Road,” against TVA’s statement at note 18. **On “cancelled”: no withdrawal of the Cheatham County Generation Site environmental impact statement has been noticed in the Federal Register** (note 16), so the review was never formally cancelled — it was noticed and never produced. The sentence is accurate as to the practical position and loose as to the administrative one. **[P] for the two texts; [I] for “cancelled” Open item, Appendix F §F.1.**

23. Deposit 10.5281/zenodo.21959989. `PROJECT_ID` 543225 appears in both archived layers: in layer 5 (files, hashes and queries at note 8) as `Middle Tennessee Generation & Transmission Capacity Expansion`, and in layer 0, file `TVA_TSSProjects_L0_centerline_20260815.geojson` (447 features, SHA-256 `2898370e8f998270834517dab9927ede84ad0bee7f8a3b89f89c83ca1af6fd0a`, query `.../TSSProjects_Hosted/FeatureServer/0/query?where=1=1&outFields=*&f=geojson`, retrieved 2026-08-15T14:10:59Z) as `Middle TN Generation & Transmission Capacity Expan`, with `STATUS` = “Active” and no `INSERVICE_DATE`. Register crosswalk `tva_tss_register_v0_1.csv`, rows for 543225. **Qualification carried from Chapter 7 §7.2 and note 3:** `STATUS` holds only three values across layer 5 — null, a single space, and “Active” — with published, unpublished, built and unbuilt projects distributed across all three, so the field is orthogonal to lifecycle. “Live” here means the record is present and carries no completion date, not that TVA has said the project is proceeding. **[P] for the record; [I] for “live”**

24. URL path comparison, 16 Aug. 2026: this page sits at `/energy/transmission/transmission-system-projects/middle-tennessee-...`, a child of the index URL itself, while every project on the index sits at `/energy/transmission/transmission-projects/`. Capture header at note 9; the same comparison at Chapter 4 §4.6 and note 25. Absence from the list of forty: TVA, *Current TVA Transmission System Projects*, retrieved 16 Aug. 2026, Chapter 4 note 1. The absence was established by reading the index listing, so it does not depend on the `noindex` configuration at Chapter 4 §4.5. **[P]**

25. Summary of notes 8, 9, 12, 16, 22, 23 and 24. **[I]**

26. Negative finding. No TVA statement on whether the transmission project survived the July 2025 generation decision has been located, and no 2026 reporting addressing it either way has been located. **The search behind this negative is not documented to standard.** `TVA_Unpublished_Projects_Research_v0_1.md` records its method as web search and direct fetch on 15 Aug. 2026, with no browser session, no paywalled sources and no records requests, and separately records that the *Cheatham County*

Exchange — the outlet most likely to have covered it — sits behind a paywall that was not crossed. No query strings, date ranges or result counts are on record. The companion guide, request T4(d) is the instrument that would close it. **[P, negative] Open item, Appendix F §F.1.**

27. *Cheatham County Exchange*, 10 Sep. 2024, quoting Tracy O'Neill, identified there as a founding member of Preserve Cheatham County; both block quotations in this section come from that article. Single outlet, uncorroborated.

Two first-hand accounts place the group's formation in 2023, immediately after TVA disclosed the project. Tracy O'Neill, "The Fight That United a Community," Southern Alliance for Clean Energy, 8 Sept. 2025, https://cleanenergy.org/news/the-fight-that-united-a-community/ — written by O'Neill herself, who describes the July 2025 outcome as arriving "after 26 months of organizing," which dates the start of the campaign to May 2023, and writes that when TVA "announced plans for a massive 900+ megawatt gas plant on Lockertsville Road … Preserve Cheatham County formed almost overnight." Angie Mummaw, "'Take your pipe and shove it': How one Tennessee community fought back a major fossil fuel project — and isn't done yet," Appalachian Voices, 18 Aug. 2025, https://appvoices.org/2025/08/18/how-cheatham-county-fought-a-major-fossil-fuel-project/ — which narrates TVA's May 2023 disclosure, the June 2023 open house at which "nearly 400 people showed up," and then, of that moment, "Out of frustration — and sheer necessity — Preserve Cheatham County was born."

What these sources are. Both authors are participants: O'Neill is a leader of the group and a Southern Alliance for Clean Energy staff member, Mummaw an Appalachian Voices organiser on the same campaign. They are advocacy accounts of their own formation, they agree with each other because they were in the same room, and **neither states a date of incorporation.** No charter or determination letter has been located. A search of the IRS Exempt Organizations Business Master File through ProPublica's Nonprofit Explorer API on 17 Aug. 2026 for "Preserve Cheatham County" returned zero organisations, so the 501(c)(3) status asserted on the group's own website and repeated in secondary coverage is **not confirmed in the federal file** — which may mean only that the extract lags. The year is established; the date is not, and the tax status is not.

Incidental corroboration for §12.5. O'Neill's September 2025 piece independently gives the transmission scope as "up to 45 miles of high-voltage transmission lines," and the AP report at note 19 gives "up to 45 miles of transmission lines," both of which sit at the top of the thirty-to-forty-five-mile range she gave the *Exchange* in 2024 (note 28). The figure is hers in all three places, so this is consistency, not independent verification; the arithmetic caution at note 29 stands.

[S[1]] for the quotations; [S] for the 2023 formation year Open item, Appendix F §F.1.

28. TVA, *Cheatham County Generation Site, Scoping Report*, 2 Nov. 2023, project number 2023-17, §3.2 and §3.2.6.1, retrieved 24 Aug. 2026 from the Azure CDN origin and linked from TVA's NEPA detail page for the project. It states, twice: "TVA would construct two to four double-circuit transmission lines (TL), totaling approximately 35 to 45 miles of new 100-foot ROW, to connect the new generation to the transmission

system." O'Neill's account, reported by one outlet, dated the disclosure to "the scoping documents that were released back in November of last year" and is now corroborated by the document itself. **[P]** — **Bounded:** the fetch truncated inside appended *Federal Register* material, so any negative about the report's appendices is bounded to the main body. **Open item, Appendix F §F.1.**

29. See note 28. The first-disclosure limb is also now supported: the antecedent Notice of Intent, 88 Fed. Reg. 32267 (19 May 2023), assesses "off-site transmission lines" and states no corridor mileage at all. **An arithmetic caution.** The project page's own scope at notes 10 and 11 totals roughly 32 to 37 miles across the three loops, and the studied-alternatives figure at note 8 is 88.8 miles. The three quantities measure different things — what a landowner was told, what TVA proposes to build, and what TVA drew as options — and must not be run together. **[S[1]]**

30. *Cheatham County Exchange*, 10 Sep. 2024, quoting Scott Brooks; see notes 5 and 6. **[S[1]]**

31. **[I]** — that Brooks was "not conceding anything," that the separation is simply how the work is organised, and that this is why the survey access proceeded while the environmental impact statement did not, are the author's readings. No TVA statement of practice on the separation of generation and transmission projects has been located, and no search for one is on record. **Open item, Appendix F §F.1.**

32. **[I]** — the author's framing. Stated in nearly identical terms at Chapter 2 §2.6 and note 27; see the overlap flagged in the working notes for this chapter, which are not published.

33. FOX 17 Nashville (WZTV), Dennis Ferrier, "TVA drops plans for methane plant in Cheatham County after public outcry, questions remain," 24 July 2025, https://fox17.com/fox-17-investigates/tva-drops-plans-for-methane-plant-in-cheatham-county-after-public-outcry-questions-remain: "Despite TVA's withdrawal, some legal issues remain unresolved. Tennessee Gas Pipeline Company, a partner in the original project, still has active lawsuits against at least 18 landowners in the area. The company declined to comment when asked if it plans to drop the litigation." **Single source.** The count of suits ("at least eighteen"), the description of Tennessee Gas Pipeline as a partner on the original project, and the company's refusal to say whether it would drop them all rest on that one report. No docket search has been run. **[S[1]] Open item, Appendix F §F.1.**

34. FOX 17 Nashville (WZTV), Dennis Ferrier, 24 July 2025 (full citation at note 33): "It remains unclear what TVA plans to do with the land it purchased for the project. The agency acquired acreage and had begun preliminary infrastructure work before the reversal. TVA has not publicly commented on next steps or the future use of the property." Both sentences of §12.6 therefore rest on one report by one outlet, which is the dependency the source register §5 already flags.

Partial corroboration on the land, none on the work. Angie Mummaw, Appalachian Voices, 18 Aug. 2025 (note 27), states that TVA "quietly bought 286 acres of rolling farmland on Lockertsville Road in Ashland City in 2020," that "[t]hose gorgeous rolling hills

are still TVA property," and that "[t]he county's offered to buy the farm back." The AP report at note 19 gives the same 286 acres. So the acquisition is corroborated, is dated to 2020, and has an acreage — none of which the chapter currently uses. **The "preliminary infrastructure work" clause is corroborated by nothing.** It rests on FOX 17 alone, on no document, and on no deed, permit or contract that has been sought. TVA property records and Cheatham County register-of-deeds records would settle both halves and neither has been pulled.

On the negative. That TVA has not stated its intentions for the land rests on FOX 17's own statement that "TVA has not publicly commented," which is a reporter's negative as of July 2025 and not a search of the thirteen months since. **[S[1]] Open item, Appendix F §F.1.**

35. Negative finding: no announcement of a data centre in Cheatham, Robertson, Dickson or northern Davidson County has been located. **No search is described for this negative** — no terms, date range, sources searched or result count are on record — and §4 of the citation standard requires them. The *Tennessee Lookout* data centre map of 10 July 2026 (source register, Chapter 10 entry) is the nearest thing to a systematic list of Tennessee sites and was not consulted for these four counties. **[P, negative] Open item, Appendix F §F.1.**

36. Cedar Hill, Robertson County: two-year moratorium on data centres and cryptocurrency mining. Reported by WSMV, 2 June 2026 (volume source register, Chapter 12 entry) and independently by Main Street Media / *Robertson County Connection*, "Cedar Hill imposes moratorium on data centers within city limits," cited at note 124 of `Tennessee_Statewide_Report_v1_0_source.md`, which gives the enactment date as 1 June 2026 and the term as two years. Two outlets agree on the term and the month. The adopted ordinance itself has not been obtained. **[S] Open item, Appendix F §F.1.**

37. Braden Ross, "Cedar Hill imposes two-year moratorium on data centers," WSMV (Nashville), published 1 June 2026 at 9:54 p.m. CDT, https://www.wsmv.com/2026/06/02/cedar-hill-imposes-two-year-moratorium-data-centers/. The mayor is named there as John Edwards. On the trigger, verbatim: "Mayor John Edwards told WSMV he got the idea after watching his neighbors across the state line in Franklin, Kentucky fight against a proposal to build three 200,000-square-foot data centers in their small town." The Main Street Media report at note 36 independently gives the trigger as a facility proposed in Franklin, Kentucky. Two outlets agree, and the specifics — the town, the count, the square footage — come from WSMV.

It is not a quotation. It is WSMV's indirect reporting: "He says while there aren't any proposals to build a data center in Cedar Hill right now, the city passed the moratorium to keep it that way for at least two years as they work through regulations." Those are the reporter's words summarising the mayor, not the mayor's own. **[S]**

38. **Retrieved 24 Aug. 2026.** Cheatham County, Tennessee, *Zoning Resolution*, consolidated text with amendments table, county website, amendment recorded as "February 2, 2026 Res # 5," amending §2.010 to add the definition and §3.060(4) to

add Data Center to the Extensive Impact Facilities list. Both passages quoted verbatim above from the adopted text. **[P]** — **Resolution #5 says nothing about zoning districts.** Which districts admit an extensive impact facility is set by Appendix A, Table I, which has not been extracted; the I2 and I3 restriction is a newspaper's characterisation and is not claimed here. **Open item, Appendix F §F.1.**

39. **The speaker is not the county attorney.** Bill Herbert is a private attorney who had represented several Cheatham County homeowners against TVA's proposed Lockertsville Road generation site. He drafted the data-centre amendment, presented it to the Cheatham County Planning Commission on 4 Dec. 2025, and then urged the County Commission to adopt it at its 20 Jan. 2026 workshop, alongside Preserve Cheatham County's Tracy O'Neill. Sharon Alice Lurie, *Cheatham County Exchange* (Main Street Media of Tennessee), "Cheatham County Planning Commission talks data center zoning, set to revisit rural resorts," 8 Dec. 2025, https://mainstreetmediatn.com/articles/cce-print/cheatham-county-planning-commission-talks-data-center-zoning-set-to-revisit-rural-resorts/ — "The Cheatham County Planning Commission unanimously approved adding data centers to the list of extensive impact facilities defined in the county zoning resolution at its regular meeting Dec. 4. The amendment would limit data centers from being built or operating in areas other than those zoned for industrial (I2 and I3). Attorney Bill Herbert, who had represented several Cheatham County homeowners …"; and Lurie, "Cheatham County Commission approves data center language in zoning resolution," 17 Feb. 2026, https://mainstreetmediatn.com/articles/cce-print/cheatham-county-commission-approves-data-center-language-in-zoning-resolution/ — "At the Jan. 20 commission workshop, attorney Bill Herbert and Preserve Cheatham County leader Tracy O'Neill urged the commission to pass the amendment." Herbert told the Planning Commission he had drafted the amendment with input from County Mayor Kerry McCarver and **County Attorney Michael Bligh**. Bligh, not Herbert, holds that office, and Bligh is not reported as having said anything quoted in this chapter.

The quotation and its provenance limit. "The purpose of this legislation is to plan for the future. So that when a data center comes to Cheatham County, we already have zoning in place that regulates where it can be located." Those words are Herbert's, from the Main Street Media coverage above. **Both articles are paywalled beyond the opening paragraph and neither was read in the subscriber edition**; the quotation and Herbert's attribution were recovered from the indexed body text of those articles rather than from the published page, and the two articles could not be told apart as to which carries this sentence. This is the same class of limit the volume flags at notes 1–5 for the unpulled docket.

Independent corroboration of the vote and of Herbert's role, though not of this sentence. The record of the 2 Feb. 2026 County Commission meeting shows Herbert speaking during public comment — "Data centers are an industrial use that should only be allowed on industrially zoned property and not in our backyards" — and the amendments passing 9 yes, 0 no, 3 absent, adding a definition of "data center" at § 2.01 and listing data centres among extensive impact facilities at § 3.0604. That meeting summary is machine-generated from the meeting video by CitizenPortal.ai and is **not cited here as an**

authority; it is noted only as a pointer to the underlying video and minutes, which are county records. **[S[1]] Open item, Appendix F §F.1.**

40. TVA, `GeneSIS_Layers` FeatureServer, owner `mbeierle0@tva.gov_tva`, layer 1 ("AOI Intersected Tax Parcels"); `capabilities: "Query"`, anonymous access, no token. Service and layer metadata captured in `TVA_org_and_NorthGallatin_20260815.json`, SHA-256 `64249836d33ebfbfc24404d4cb3374f851f28656a12669fa96e39a9056428f39`, endpoint `https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services`, retrieved 2026-08-15T14:10:59Z, deposit 10.5281/zenodo.21959989. The fourteen counties are the distinct `(CNTYNAME, STNAME)` values on layer 1; the Cheatham figure is `where=CNTYNAME='Cheatham'&returnCountOnly=true`, returning 10,601; Robertson appears in the same distinct-value result. `STUDYPHASE` holds the single value "Initial Feasibility Processing" across the layer and the snapshot was last edited 2025-07-30, which is the basis for "as of July 2025." Note that `COUNTY` and `STATE` are null throughout and the populated fields are `CNTYNAME` and `STNAME` (Appendix E note 11). **Reproducibility limit, stated: the 151,858 parcel records were deliberately not captured**, because they carry landowner names and mailing addresses — `gis_archive_20260815/MANIFEST.txt`, "NOT captured, deliberately." The deposit holds layer metadata only, so the county counts are **not recomputable from the archived files** and would have to be re-queried against the live service. See Appendix E notes 1–5. **[P] Open item, Appendix F §F.1.**

41. Summary of notes 8, 16, 24, 36, 38 and 40. **[I]**

42. TVA, *Lists of Completed Categorical Exclusion Checklists*, https://www.tva.com/environment/environmental-stewardship/environmental-reviews/categorical-exclusions, and the eight documents linked from it, 27 Apr. 2020 – 31 Mar. 2026, 11,899 records, retrieved 17 Aug. 2026; retrieval route and cautions at Chapter 3 note 5. Absence established by searching all 11,899 records for "Middle Tennessee," the project identifier's associated names, and every Cheatham and Robertson County row. **Two bounds.** The series begins 27 April 2020 and records nothing closed before that date, which does not reach this project on its stated 2023–24 chronology but is a general limit on the method. And absence from a published list is not proof that no determination exists: publication lags, and one closed after March 2026 would not yet appear. The claim is therefore the dated one — as of TVA's most recent published list, no categorical exclusion determination for this project had been published, and TVA's environmental reviews index carries no assessment or impact statement for it either (note 22). **[P, negative]**

43. Associated Press, July 2025, on TVA's evaluation of coal units for extended operation, including Cumberland Unit 2. **[S[1]] — a single wire report, quoted here from the reporting rather than from a TVA document.** No TVA statement of a changed retirement date for Cumberland Unit 2 has been located, and the volume does not assert one; what the sentence carries is that the retirement which began the chain at §12.1 is under review. **Open item, Appendix F §F.1.**

Chapter 13 — Lowndes County, Mississippi

Verified 15 August 2026; the Commercial Dispatch article captured 24 August 2026.

13.1 Two sources, one article, one day

On 30 May 2025 the Columbus *Commercial Dispatch* reported that TVA had announced the route of a new transmission line through Clay, Lowndes and Oktibbeha Counties. The headline said nineteen miles; the body said the line "will be less than 19 miles long, the release said"; TVA's own project page says "about 18 miles." This chapter uses TVA's figure and records the newspaper's.[1] The reporter asked TVA why it was being built. TVA Senior Strategic Communicator Julia Wise replied by email:[2]

> "This new connection will provide increased reliability in the area by expanding access to generation assets, by enhancing grid flexibility and by attracting economic development."

The article quotes TVA's release as saying the line "will support growth and increase power reliability in Clay, Lowndes and Oktibbeha counties." The release itself has not been located, so what is established is what the newspaper printed.[3]

Three paragraphs further down the same story, the chief executive of the Golden Triangle Development LINK, the regional economic development agency, is described as having[4]

> "confirmed the line's purpose is to provide power to the new Aluminum Dynamics mill, set to open this summer."

and quoted directly:[5]

> "TVA is working on electrical grid improvements that will not only benefit the new aluminum mill but ultimately the new CINCO Megasite. This power availability (will) be a major site differential and should increase our chances for meaningful success for the Golden Triangle region."

One story. One day. One reporter. Two sources describing the same line. The economic development agency names the customer. The utility building it does not.[6]

This chapter is about what sits at the other end of that corridor.

13.2 CINCO

CINCO is a megasite, not a code name.[7]

The CINCO Megasite is 1,440 acres of publicly owned land in western Lowndes County, north of Highway 82, certified in May 2025 as the fifth TVA-certified megasite in the Golden Triangle.[8] *Cinco* is five. It is site number five in a numbered series.[9]

Mississippi has put money into it. At the unveiling in May 2025 the governor announced a $5.5 million state site development grant, earmarked for a one-million-gallon water tank on the site. The tank and a sixteen-inch connection line together are costed at about $11,428,000, to be sought from the Appalachian Regional Commission against a fifty per cent match — some $5,714,000 — of which the state grant is to supply the greater part and county bond proceeds the balance. Lowndes County supervisors and the county industrial development authority split a $500,000 due-diligence estimate between them in June 2023.[10]

The local power company is 4-County Electric Power Association, whose corporate office sits on the far side of Highway 82 from the site.[11]

Mississippi's own marketing page for the site lists its electric capacity as **16 megawatts**, with a further note that it is upgradeable to 30.[12]

At the unveiling, the chief executive of the Golden Triangle Development LINK put a different number on the same site. Among its advantages, he said, was "the 180 megawatts of power being scoped by the Tennessee Valley Authority."[13]

Those two figures are eleven times apart and they are not in conflict. One is what the site can take delivery of today. The other is what TVA is studying for it. The distance between them is the thing this chapter is about, and it is the distance an insert loop closes.

Note where each number lives. Sixteen megawatts is on the page a prospect reads. A hundred and eighty is in a development official's remarks at a ribbon-cutting, reported by a local paper. TVA has published neither.[14]

13.3 The project with no page

TVA's register carries:[15]

```
Project CINCO Phase I, MS 161-kV ROW (Insert Loop Artesia-
Severcorr MS 161-kV TL)
```

Project identifier 631350. Siting engineer Bethany Butler.[16]

The name describes the engineering precisely. An insert loop cuts an existing conductor mid-span and routes both severed ends into a new substation, so the station sits electrically in series on the line rather than at the end of a dedicated radial feed. It is cheaper and faster than building a new line from a distant source, and it gives the new load supply from two directions.[17] "Phase I" implies later phases as load grows.[18]

The line being tapped is the Artesia–Severcorr 161-kV.[19] SeverCorr was the name the steel mill at Columbus carried for about two years. It was founded as SteelCorr by the American steel executive John Correnti; when the Russian steelmaker Severstal put in the capital in 2005 it became SeverCorr, *Sever* from one partner and *Corr* from the other; Severstal bought Correnti out at the end of 2007 and renamed it Severstal Columbus; Steel Dynamics bought it in 2014 and renamed it again. TVA never renamed the line. Four corporate names

in twenty years, and the one the transmission record kept is the one that lasted two — which is its own small illustration of how engineering records preserve what marketing materials replace.[20]

There is no public project page for Project CINCO Phase I. TVA's Mississippi list does not contain it.[21]

The project identifier places it in TVA's newest block. Its neighbours in that block are Appalachia Area Improvement (629986), Commerce Park 2 (630471), the 109 North delivery point (631204) and Belmont Stage 2 (631231). Three of those four have public project pages.[22]

13.4 The published line into the same substation is on hold

Belmont Stage 2 is the line from the story above, about eighteen miles on TVA's own page: Clay 500-kV Substation at West Point, south to the Artesia 161-kV Substation at Columbus. It has a public page. That page carries:[23]

> "Update – May 2026: TVA has temporarily placed this project on hold; however, the project is still planned for completion. Once work resumes and the project timeline is re-evaluated, revised dates will be posted."

So the position at Artesia in August 2026 is that the publicly noticed line into the substation is paused, and an unpublished loop off the same substation sits in TVA's newest project block.[24]

The LINK's chief operating officer, in November 2024, described the state of play:[25]

> "We're intimately aware of the project. The Golden Triangle Regional Airport area is or will be home to some of TVA's largest customers. The region is robust with numerous power feeds serving the park, and additional power sources are being studied to support Cinco."

13.5 What is not known, stated as not known

No tenant has been announced for the CINCO Megasite. No data centre has been announced in Lowndes County, Mississippi.[26]

Two readings of the record are available and it does not distinguish between them. TVA may be pre-building the loop ahead of a prospect that has not been announced, which is ordinary megasite practice and the reason megasites exist. Or a specific large load is already in the interconnection queue and the loop is its connection. Nothing in the public record decides it.[27]

What can be said is narrower. A certified 1,440-acre megasite advertised at 16 megawatts, with 180 under study according to the agency marketing it, has an unpublished TVA

transmission project attached to it, in TVA's newest project block, while the published line serving the same substation is paused.[28]

The regional economic development agency talks about the site's power supply on the record. TVA does not.[29]

Two red herrings. Searches for a Lowndes County data centre return an 800-acre data centre *proposal* in Lowndes County, *Alabama* — "Project Red Clay," a land assembly by the developer Cloverleaf Infrastructure, with no named tenant and no county approval. A separate "Cinco" is a 300 megawatt Rowan Digital Infrastructure campus in Medina County, Texas. Neither has any connection to Mississippi.[30]

13.6 The corridor is filling regardless

Whatever CINCO becomes, the Artesia corridor is absorbing load now. Aluminum Dynamics announced a *second* Lowndes County investment in July 2026 — a recycled aluminium slab centre, more than $200 million, relocated from Arizona. It is not the mill from §13.1, which was already opening when that article ran. SDI Biocarbon Solutions cut the ribbon on its $300 million facility near Columbus in April 2026, a year after the plant had begun producing, by which time a $100 million expansion tripling its output was already under construction. PACCAR opened a $209.4 million engine-remanufacturing expansion in March 2026, on a project announced in 2023. Firehawk Aerospace opened a 636-acre rocket integration facility at Crawford in March 2026, on a site it bought rather than built.[31]

Three of those four are ribbon-cuttings on decisions taken earlier, and the fourth is a relocation. The load is real; the dates are ceremonial.

TVA is building generation to match. The New Caledonia gas plant in Lowndes County is roughly 500 megawatts across six simple-cycle combustion turbines, nearly $800 million, on a 145-acre site that once held an Enron plant, with completion set for May 2028. Its groundbreaking was held in October 2025, by which time the earthmoving was already well advanced.[32]

None of that appears in the stated purpose of the transmission line that serves it, which is increased reliability, grid flexibility, and attracting economic development.[33]

13.7 Why Mississippi belongs in a Tennessee volume

Because the disclosure pattern is not a Tennessee artifact — and because Mississippi shows the same result by a more troubling route.

The same federal corporation describes its lines to Mississippi landowners in the same terms it uses in Tennessee. The Golden Triangle article is the cleanest available demonstration because both channels appear in one document on one day: the development agency names the customer and TVA, quoted in the same piece, does not.[34]

Mississippi's law does not read the way Tennessee's reads, and the same conclusion arrives by a different route. Tennessee excludes TVA by definition; Mississippi's statute reaches TVA on its face.

Mississippi *has* a certificate requirement, and it reaches transmission. Section 77-3-11(2) of the Mississippi Code provides that "[n]o person shall construct, acquire, extend or operate equipment for manufacture, generating, **transmitting** or distributing electricity for any intrastate or interstate sale to or for the public for compensation without first having obtained from the commission a certificate that the present and future public convenience and necessity require or will require the operation of such equipment or facility."[36] Section 77-3-14(1) adds a construction certificate, binding on "no public utility **or other person**."[37] And the Commission's authority runs to the route: § 77-3-13(3) empowers it to issue a certificate "for the establishment or construction of a portion only of the contemplated plant, **route, line or system**, or extension thereof," and to attach such terms and conditions as public convenience and necessity require.[38] Mississippi is not a state without transmission siting authority. It is a state that has it and exercises it.[39]

What Mississippi does *not* have is Tennessee's exclusion. Tennessee removes TVA from its public utility statute by definition, in terms: § 65-4-101(6)(A)(i) excludes any "corporation owned by or any agency or instrumentality of the United States."[40] The Mississippi definition at § 77-3-3(d) contains no such carve-out. Its only two exclusions are for a person supplying himself, his employees or his tenants, and for a person reselling metered retail electricity to charge electric vehicles. Neither reaches TVA. The surrounding definitions run the other way: "corporation" is defined to include "a **private or public** corporation," and "person" to include "any other legal entity."[41] On the face of the Mississippi statute, a federal corporation building a transmission line for compensation is inside the definition.

So TVA's exemption in Mississippi is not a state-law exemption at all. It is federal. TVA is an instrumentality of the United States, Congress gave it power to construct transmission lines and to acquire the land for them, and a State may not condition the exercise of that authority on a state permit absent a clear congressional waiver, which the TVA Act does not contain.[42] The Mississippi legislature plainly knows how to name TVA when it wants to — § 77-5-203(h) defines "federal agency" to include the Tennessee Valley Authority by name, and § 77-5-257, captioned "TVA jurisdiction," directs the Public Service Commission not to regulate those aspects of an electric power association's business that TVA already regulates, and to defer to TVA's asserted authority until a court says otherwise. But that provision is about the distributor cooperatives that buy TVA power. It says nothing about TVA's own facilities and nothing about transmission construction.[43]

No Mississippi decision resolves the question either way. No statute, Commission order or reported case addressing whether TVA must obtain a Mississippi certificate for a transmission line was located, and the search was of free sources only — so the position stated here rests on the statutory text and the federal immunity principle, not on any Mississippi holding.[44]

That is a sharper finding than the disclosure point alone, and it belongs in the volume's argument. In Tennessee, a landowner has no siting proceeding because the legislature wrote TVA out of the statute, so there is no proceeding for anyone to be excluded from. In Mississippi there *is* a proceeding. The Commission holds hearings, reviews routes, and can condition or refuse a certificate — for Entergy, for Mississippi Power, for a merchant developer bringing a high-voltage line across eleven counties.[39] A Mississippi landowner whose property a TVA line will cross loses a forum that a Mississippi landowner on any other company's line would have. The asymmetry the Tennessee chapters describe as an absence is, in Mississippi, a visible exception carved out of a functioning system by federal supremacy.

The disclosure consequence is the same in both states, and §13.1 shows it operating. It also shows what fills the gap. In Mississippi the customer's name reaches the public through an economic development agency that has every incentive to announce it. Where no such agency is talking, as in Maury County, what fills the gap is a register row and another agency's appendix, and nothing directs a property owner to either.[35]

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S¹] single source, [I] author inference.

1. *The Commercial Dispatch* (Columbus, Miss.), Abigail Sipe Rochester, "Location announced for planned 19-mile power line," 30 May 2025, `cdispatch.com/news/location-announced-for-planned-19-mile-power-line/`, **retrieved in full 24 Aug. 2026 at no charge**; the page appends a subscription overlay but serves the complete article text. **[S¹]** — one outlet. The headline gives nineteen miles and the body gives "less than 19 miles," against "about 18 miles" on TVA's own project page; §13.1 uses TVA's figure. TVA placed the project on hold in May 2026 while stating it "is still planned for completion."
2. Ibid., quoting TVA Senior Strategic Communicator Julia Wise, who replied by email; she is now named in the text, as TVA's spokesperson is named at Chapter 10 §10.1. **[S¹]** — one outlet, and the emailed answer appears in no other. A free syndicated reprint of the release material exists at the *Northeast Mississippi Daily Journal* but carries none of the email quotations.
3. Ibid.: the release language as quoted in the article. **TVA's release itself has not been located or captured** and is not in the volume's source register. The wording differs from TVA's Belmont Stage 2 project page (note 23), which says the line "would provide power for growing load and increase power reliability in Clay, Lowndes, and Oktibbeha Counties"; the release and the page are not the same text, and the difference should not be smoothed. **[S¹] Open item, Appendix F §F.1.**
4. Ibid.: Joe Max Higgins, chief executive of the Golden Triangle Development LINK. "Confirmed" is the reporter's characterisation of what Higgins said; this chapter reproduces the characterisation as the reporter's, and the note preserves that distinction. Higgins is not named in this chapter's text. **[S¹]**

5. Ibid., quoting Higgins directly. The quotation as reproduced here carries a second sentence — "This power availability (will) be a major site differential and should increase our chances for meaningful success for the Golden Triangle region" — that does not appear in the extract recorded in `TVA_Sumner_Gallatin_Meta_v0_1.md`, which stops at "the new CINCO Megasite." The parenthetical "(will)" is the newspaper's interpolation and must be preserved as such. **[S[1]] Open item, Appendix F §F.1.**
6. **[I]** — the author's framing of the article at note 1. The underlying facts — two sources, one story, one day, one naming the customer and one not — are established by notes 2 to 5.
7. `TVA_Unpublished_Projects_Research_v0_1.md` (15 Aug. 2026) §2, "Project CINCO — a numbered megasite, not a codename." The reading rests on the certification record at note 8, not on the register entry at note 14. **[P]**
8. The CINCO Megasite: 1,440 acres of publicly owned land in western Lowndes County, north of Highway 82, certified in May 2025 as the fifth TVA-certified megasite in the Golden Triangle. Mississippi Development Authority CINCO site page and Golden Triangle Development LINK news index, both listed in the volume's source register, Chapter 13 entry; recorded in `TVA_Unpublished_Projects_Research_v0_1.md` §2. **Neither page has been captured, hashed or archived**, and both are controlled by parties with a direct interest in marketing the site. Under §4 of the citation standard neither may be cited from the live web in print until an archived copy exists. **[S] Open item, Appendix F §F.1.**
9. **[I]** — that the name records a position in a numbered series follows from *cinco* and from the certification as the fifth such site at note 8. Neither TVA nor the Mississippi Development Authority states a naming rule, and none has been sought. **Open item, Appendix F §F.1.**
10. *The $5.5 million.* Cadence Harvey, "Cinco Megasite issued a $5.5 million grant from state," *The Commercial Dispatch* (Columbus, Miss.), 16 May 2025, https://cdispatch.com/news/cinco-megasite-issued-a-5-5-million-grant-from-state/. Gov. Tate Reeves announced the Mississippi Development Authority grant on Thursday 15 May 2025, at the site's unveiling celebration, to a crowd of about 150: "we have awarded a $5.5 million site development grant for this project." The article's own framing in its opening line is that the grant is "to construct a million-gallon water tank on the site's grounds."

The water system. Emma McRae, "Supes approve match for CINCO water tank," *The Commercial Dispatch*, 5 June 2025, https://cdispatch.com/news/supes-approve-match-for-cinco-water-tank/, quoting Golden Triangle Development LINK project manager Elizabeth Templeton: the million-gallon tank and a sixteen-inch water connection line "are expected to cost approximately $11,428,000"; the LINK "has submitted an application for a grant from the Appalachian Regional Commission to fund the cost of the project"; and the $5.5 million state award "will go toward meeting the 50% required match for the ARC grant," with "a portion of the county's bond proceeds that will be used to make up the balance." Templeton adds the caveat the chapter should carry: "The exact cost of the improvements

will not be known until the project bids, which we anticipate late spring or early summer of next year."

The 2023 contributions. Brian Jones, "Cinco megasite proposed for 1,500 acres near Golden Horn," *The Commercial Dispatch*, 21 June 2023, https://cdispatch.com/news/cinco-megasite-proposed-for-1500-acres-near-golden-horn/. The Board of Supervisors "voted unanimously Tuesday morning to pony up $250,000," which Joe Max Higgins told them was "about half of the cost to do 'due diligence'"; "The cost estimate is $500,000 in total cost, and Higgins said the LCIDA has agreed to pay half."

The nearest confirmation that the money was actually spent is Higgins's remark in May 2025 that "about $500,000 of due diligence work has already been completed at the site, including soil borings, wetland studies, floodplain studies and cultural planning."

Standing gaps. The Governor's own release has still not been obtained and is not in the volume's source register. The disposition of the ARC application is not on record. None of the three *Dispatch* articles has been captured or archived, so §4 of the citation standard forbids citing them live in print, and all three are behind a metered paywall that opens for the first article only. **[S] for the $5.5 million grant and for the June 2023 due-diligence split; [S[1]] for the $11,428,000 estimate and the match arithmetic Open item, Appendix F §F.1.** 11. Golden Triangle Development LINK, *Cinco Megasite Industrial Development Site — Lowndes County, MS*, https://gtrlink.org/do-business-here/cinco-megasite/, retrieved 17 Aug. 2026, page last modified 23 Dec. 2025. The site's infrastructure panel lists, verbatim: "**ELECTRIC** / 16 MW / 4-County Electric Power Association," alongside sewer (Prairie Land Water), water (Lowndes County Industrial Development Authority) and gas (Atmos Energy). The same panel gives the property address as "North Frontage Road, Columbus, MS 39701," the acreage as 1,440, and ownership as "Public." 4-County Electric Power Association is one of TVA's local power companies and appears in TVA's own local-power-company directory; it is an electric cooperative serving all or part of nine east-central Mississippi counties, with its corporate centre at 5265 South Frontage Road, Columbus.

North and South Frontage Roads are the service roads flanking U.S. Highway 82. The megasite lies north of Highway 82 and its southern boundary is North Frontage Road (note 10, *Commercial Dispatch*, 21 June 2023 and 16 May 2025). 4-County's corporate centre is at 5265 South Frontage Road — and it was the venue at which the megasite's own unveiling ceremony was held on 15 May 2025. **The evidence is two published addresses and a ceremony, not a survey.** No plat, no distance measurement and no statement by either party has been obtained. The LINK page is controlled by the party marketing the site and has not been captured or archived; same limit as note 8. **[S] for 4-County as the site's electricity provider; [I] for the geographic relationship, inferred from the two published addresses Open item, Appendix F §F.1.** 12. Mississippi Development Authority marketing page for the CINCO Megasite, electric capacity "16 MW, upgradeable to 30 MW"; recorded in `TVA_Unpublished_Projects_Research_v0_1.md` §2. Same capture gap as note 8: not archived, and held by the party marketing the site. **This figure is load-bearing for §13.2 and §13.5 and is the single most important capture outstanding for this chapter.**

Corroboration and a serious complication, both found 17 Aug. 2026. The Golden Triangle Development LINK's own site page (note 11) independently gives the site's electric service as "16 MW," which corroborates the number from a second interested party — but it gives **no "upgradeable to 30 MW."** The upgrade clause rests on the MDA page alone.

The complication is larger. Joe Max Higgins, the LINK's chief executive, told the *Commercial Dispatch* at the site's unveiling on 15 May 2025 — the same event and the same article as the $5.5 million grant at note 10 — that the tank, "paired with position of the site and **the 180 megawatts of power being scoped by the Tennessee Valley Authority**, will make this Megasite 'far and away' the best in the area." One hundred and eighty megawatts. That is not what the site is marketed at, and it is not 30 either. **This bears directly on §13.2 and §13.5 and on the unpublished Project CINCO Phase I loop at note 14.** The two numbers are not necessarily in conflict — 16 MW is plausibly what is deliverable today and 180 MW what TVA is studying for the future, which is exactly the kind of thing an insert loop off the Artesia–Severcorr line would deliver — but the chapter currently argues from the 16 MW figure as though nothing larger were in prospect, and the region's economic development chief said on the record, at the certification ceremony, that TVA was scoping eleven times that. **[S[1]] for the 16 MW / 30 MW pair; [S[1]] for the 180 MW scoping figure, which is Higgins's and is uncorroborated by TVA Open item, Appendix F §F.1.** 13. *The Commercial Dispatch* (Columbus, Miss.), Cadence Harvey, 16 May 2025, quoting Joe Max Higgins at the CINCO unveiling of 15 May 2025. Single outlet, not archived. The 180-megawatt remark reframes it: the gap is between present delivery and study, which is what a megasite is for, and the sharper question is why the study is public only in an economic development official's remarks. **[S[1]] Open item, Appendix F §F.1.** 14. **[I]** — that the two figures are reconcilable as delivery-now against capacity-under-study, and that the insert loop at §13.3 is what would close the distance, are the author's readings. TVA has published no capacity figure for the site and has not described the loop's purpose. The 16-megawatt figure at note 12 remains the single most important capture outstanding for this chapter, and the 180 now joins it. **Open item, Appendix F §F.1.** 15. Turner, Tommy N. (2026). *TVA Transmission Siting GIS Capture, 15 August 2026* [Data set]. Version 1.0. Zenodo. https://doi.org/10.5281/zenodo.21959989. Layer 5 of `TSSProjects_Hosted`: files `TVA_TSSProjects_L5_alternatives_p1_20260815.geojson` (2,000 features, SHA-256 `d9680cf1121d1a29ef058645d566b67e7adec8e08042dea4b6b3a98f0a6c59d4`) and `TVA_TSSProjects_L5_alternatives_p2_20260815.geojson` (645 features, SHA-256 `51837a7828255e6da505ecfa073285da940664602c0a3f21c3f8c2912d1b1393`); queries `.../TSSProjects_Hosted/FeatureServer/5/query?where=1=1&outFields=*&f=geojson&resultRecordCount=2000&resultOffset=0` and the same with `resultOffset=2000`, retrieved 2026-08-15T14:10:59Z. The `PROJECT_NAME` value is reproduced verbatim, hyphenation and spacing as in the field. **[P]** 16. Ibid.: `PROJECT_ID` 631350 and the engineer field on the same records; register crosswalk `tva_tss_register_v0_1.csv`, row `5 alternatives, "Project CINCO Phase I, MS 161-kV ROW (Insert Loop Artesia-Severcorr MS 161-kV TL)", 631350, Bethany Butler`. **Qualification from Chapter 7 §7.4 and `TVA_Register_Crosswalk_v0_1.md`:** the engineer field is a hand-typed box carrying

inconsistent name forms for the same person across roughly 25 engineers, and assignment does not predict publication — Butler holds the published 109 North delivery point as well as this unpublished project. The companion guide, request T4(c) gives the work order as 2L08L; that value is not reproduced in this chapter. **[P]** 17. **[I]** — the description of insert-loop practice, and the comparative judgement that it is cheaper and faster than building a new line from a distant source, are the author's. No engineering source is cited for either and none is on record. The reading is consistent with the project name at note 15 but is not established by it. **Open item, Appendix F §F.1.** 18. **[I]** — "Phase I" implying later phases as load grows is a reading of the name. TVA publishes no phasing statement for this project, there being no public page (note 21). 19. Line name from the register entry at note 15: `Insert Loop Artesia-Severcorr MS 161-kV TL`. **[P]** 20. *The actual sequence.* William Browning, "From Moscow to Mississippi: Sanctioned Russian oligarch played key role in making steel mill a reality," *The Commercial Dispatch* (Columbus, Miss.), 10 March 2022, https://cdispatch.com/news/from-moscow-to-mississippi-sanctioned-russian-oligarch-played-key-role-in-making-steel-mill-a-reality/ — "It began with the late John Correnti… He named the venture Steelcorr and partnered with billionaire investor Carl Icahn. The first tentative plans were to build the mill in Arkansas… When that plan fell apart, Icahn backed out. Mordashov… stepped in"; and, of 2005, "he partnered with Correnti, putting $200 million in capital into Steelcorr, **which was renamed SeverCorr**." The financing closed 30 Sept. 2005 after a $60 million state loan approved by Gov. Haley Barbour; Mississippi committed $25 million for site preparation and Lowndes County bought 1,400 acres for $6.5 million; the $880 million mill opened fully in August 2007; and "[b]y December of that year… it was announced that Severstal was buying out Correnti," after which the plant traded as Severstal Columbus. Corroborated on the naming by Dennis Seid, "Steel mill investment in Lowndes County a gamble that paid off," *Mississippi Business Journal / Northeast Mississippi Daily Journal*, which records Higgins's decision "to bring in veteran steel industry executive John Correnti to build what was then SteelCorr."

The sale. Steel Dynamics, Inc., "Steel Dynamics To Acquire Severstal Columbus; Acquisition To Accelerate Future Growth," PR Newswire, 21 July 2014, https://www.prnewswire.com/news-releases/steel-dynamics-to-acquire-severstal-columbus-acquisition-to-accelerate-future-growth-267889351.html — "Steel Dynamics, Inc. … today announced that it has entered into a definitive agreement to acquire 100% of Severstal Columbus, LLC ('Columbus') from OAO Severstal. Located in northeast Mississippi, Columbus is one of the newest and most technologically advanced mini-mills in North America. Steel Dynamics will purchase Columbus for $1.625 billion in cash," bringing "3.4 million tons of hot roll steel production capacity." The transaction closed 16 Sept. 2014; the plant now trades as Steel Dynamics' Flat Roll Division – Columbus.

So the name is a portmanteau of the two partners — **Sever**stal and **Corr**enti — which is why it could not survive the buyout of one of them. It was the mill's name for roughly two years out of four names in twenty. **That sharpens the chapter's point:** the transmission record did not merely fail to keep up with one rebranding, it froze on the shortest-lived name of the four.

What is still soft. The Browning article is a feature by a special contributor, not a corporate record, and the exact month of the Severstal Columbus renaming is given differently in

different trade accounts (2007 in some, early 2008 in others); the chapter says “at the end of 2007,” which follows Browning’s December 2007 buyout announcement. That TVA never renamed the line rests on the register entry at note 15 read against this history. **[P] for the Severstal-to-Steel-Dynamics sale, price and date; [S] for the SteelCorr → SeverCorr → Severstal Columbus sequence; [I] for the observation about engineering records Open item, Appendix F §F.1.** 21. Negative finding. TVA, *Current TVA Transmission System Projects*, retrieved 16 Aug. 2026 (Chapter 4 note 1): forty unique projects across five states, nine of them under the Mississippi heading, none of which is Project CINCO Phase I. Established by reading the index listing, so the finding does not depend on TVA’s `noindex` configuration (Chapter 4 §4.5). **[P, negative]** 22. Register crosswalk `tva_tss_register_v0_1.csv` and Chapter 7 §7.5 and note 14: Appalachia Area Improvement 629986, Commerce Park 2 630471, the 109 North delivery point 631204, Belmont Stage 2 631231, against Project CINCO Phase I at 631350. **Qualification carried from Chapter 7 note 15:** that identifiers are issued at project initiation, and therefore that a higher block means a newer project, is an inference from correlation against the forty dated records. TVA publishes no identifier scheme. **[P] for the identifiers; [I] for the chronology** 23. TVA, *Belmont Stage 2, Mississippi (Clay, Lowndes, and Oktibbeha Counties)*, https://www.tva.com/energy/transmission/transmission-projects/belmont-stage-2–mississippi-(clay–lowndes–and-oktibbeha-counties), capture of 16 Aug. 2026, `TVA_page_capture_belmont_stage_2_mississippi_20260816.txt`, deposit 10.5281/zenodo.21959989. The “Update – May 2026” hold notice is quoted verbatim from that capture. Endpoints per the page: the Clay 500-kilovolt Substation at 2740 TVA Road, West Point, extending south to the Artesia 161-kilovolt Substation at 1280 Mims Road, Columbus. **The page states “about 18 miles,” against the 19 miles at note 1.** The capture also records `meta-robots: noindex` and a canonical tag pointing to the parent index (Chapter 4 §4.5), and an unreconciled internal inconsistency in TVA’s own schedule: the May 2025 update gives construction beginning spring–summer 2027 and in service summer 2027, while the Background gives construction summer–fall 2027 and in service winter–spring 2027–2028. No Internet Archive check has been run on this page; the source register §3 lists it as not yet checked. **[P] Open item, Appendix F §F.1.** 24. Juxtaposition of notes 15, 16, 21 and 23. Both facts are established. **That they stand in the relation the sentence implies is the author’s arrangement of them: nothing in the public record connects the hold on Belmont Stage 2 to the CINCO loop**, and this chapter does not assert a connection. **[P] for the two facts; [I] for the juxtaposition** 25. *The Commercial Dispatch*, November 2024, quoting the Golden Triangle Development LINK’s chief operating officer; listed in the volume’s source register, Chapter 13 entry, as “*Commercial Dispatch*, Nov 2024 (Fisackerly),” and recorded in `TVA_Unpublished_Projects_Research_v0_1.md` §2. **The exact date, headline and author of the article are not recorded in the project files**, the speaker is named in the register but not in this chapter’s text, and the article has not been captured. Single outlet. **[S[1]] Open item, Appendix F §F.1.** 26. Negative finding, stated three times in this section by design. No tenant for the CINCO Megasite, and no data centre in Lowndes County, Mississippi, has been announced in any source located. **The search behind the negative, stated:** `TVA_Unpublished_Projects_Research_v0_1.md` records its method as web search and direct fetch on 15 Aug. 2026, with no browser session, no paywalled sources and no records requests. No query strings, date ranges or result counts are on record,

which is short of §4 of the citation standard. Two specific gaps are known: **the Lowndes County Board of Supervisors minutes have not been read**, and *Commercial Dispatch* items including "Lowndes' Year in Review" and the full "Project Jacket revealed" sit behind a paywall that was not crossed. The minutes are obtainable by anyone: the Mississippi Public Records Act imposes no residency requirement and requires a response within seven working days, Miss. Code Ann. § 25-61-5(1)(a) (2025); § 25-61-5(4) suspends the time limits while a public body is preparing or conducting a competitive procurement, which is the response to expect if a prospect is live and which is itself informative; and § 25-61-5(3) requires any denial to be in writing citing the specific exemption, requires the body to keep a file of all denials for three years, and makes that file a public record. The companion guide, request MS1 sets out the language. **[P, negative] Open item, Appendix F §F.1.** 27. **[I]** — both readings are the author's, and the statement that the record does not distinguish between them is the finding. Neither reading is asserted by any source, and the section is written to keep them open. 28. Summary of notes 8, 12, 15, 21 and 23. **[I]** 29. That the Golden Triangle Development LINK discusses the site's power supply on the record rests on notes 4, 5 and 24. That TVA does not rests on the stated purpose of the Belmont Stage 2 page at note 23, which names no customer, on TVA's quoted statements at notes 2 and 3, and on the absence of any public page for Project CINCO Phase I at note 21. The generalisation is Chapter 5's and Chapter 6's; here it is a description of the documents cited. **[S[1]] for TVA's quoted statements; [P, negative] for the silence** 30. *(i) Alabama.* Grayson Everett, "An 800-acre data center is being quietly pushed in Lowndes County. Its neighbors are just finding out," *Yellowhammer News*, 24 April 2026, https://yellowhammernews.com/an-800-acre-data-center-is-being-quietly-pushed-in-lowndes-county-its-neighbors-are-just-finding-out/ — "At the intersection of U.S. Highway 80 and Alabama Highway 21, in a wooded corner of northeast Lowndes County, a Houston-based developer has been quietly assembling the land"; "The developer is Cloverleaf Infrastructure, a two-year-old company that raised $300 million from private equity firms. Its proposed Lowndes project, code-named 'Project Red Clay,' is an 800-plus-acre site being positioned for an as-yet-unnamed data center tenant"; "Cloverleaf does not build, own, or operate data centers." Corroborated by Jessica Knox, "Lowndes County leaders, residents continue debate over proposed Project Red Clay data center," WSFA 12 News (Montgomery), 29 April 2026, https://www.wsfa.com/2026/04/30/lowndes-county-leaders-residents-continue-debate-over-proposed-project-red-clay-data-center/ — "Materials shared publicly describe a data center campus that could span roughly 800 acres in the Burkeville area, near Highway 80 and Highway 21," and "County leaders say conversations are still in the early stages and no final approval has been made." The story was first reported by *The Lowndes Signal* earlier in April 2026, which Yellowhammer credits.

It is a **proposal**: a land assembly by a site developer, with no announced tenant, no siting approval and no construction. Both sources hedge the acreage as "800-plus" or "roughly 800." **[S]**

(ii) Texas. Dan Swinhoe, "Rowan Digital breaks ground on 300MW data center campus outside San Antonio, Texas," *Data Center Dynamics*, 8 August 2025, https://www.datacenterdynamics.com/en/news/rowan-digital-breaks-ground-

on-300mw-data-center-campus-outside-san-antonio-texas/ — "the Cinco data center campus, a 300MW hyperscale project outside San Antonio, Texas"; "Located in Medina County and served by utility AEP, the 440-acre site is expected to be fully operational in 2027"; "the $900 million Cinco project is 'tailored to the long-term needs of a top five US technology company.'" Corroborated by Swinhoe, "Rowan secures $500m for 300MW Texas data center project," *Data Center Dynamics*, 12 February 2026, and by the developer's own portfolio page, Rowan Digital Infrastructure, *Project Cinco | Hyperscale Data Center Campus | Texas*, https://rowan.digital/portfolio/cinco-texas/ (Texas / 300 MW / 440 acres).

Two precisions. 300 MW is full build-out, not first phase — the initial tranche is 60 MW. And Rowan is the developer; the end user is unnamed in every source located. Note also that Rowan has a second, separate 300 MW Texas campus at Temple, which is easy to conflate with this one. **[S]**

The point these two are used to make is a negative — that neither is connected to Mississippi — and that negative is unaffected by any of this. **Open item, Appendix F §F.1.**
31. *(a) Aluminum Dynamics.* Mississippi Development Authority (Ken Patterson), "Aluminum Dynamics to develop recycled aluminum slab center in Lowndes County," 14 July 2026, https://mississippi.org/news/aluminum-dynamics-to-develop-recycled-aluminum-slab-center-in-lowndes-county/ — "Aluminum Dynamics, a recycled aluminum manufacturer, plans to develop a recycled aluminum slab center in Lowndes County. The project represents a corporate investment of more than $200 million and will create 100 new jobs"; the facility will sit "in the Golden Triangle Industrial Park" and "is expected to begin operations in the first half of 2027." Corroborated by Frank Corder, "Aluminum Dynamics investing another $200 million in Lowndes County," *Magnolia Tribune*, 14 July 2026. This is a relocation, not a fresh siting. Steel Dynamics, Inc., "Steel Dynamics Reports Second Quarter 2026 Results," 20 July 2026, https://ir.steeldynamics.com/steel-dynamics-reports-second-quarter-2026-results/, records "a $16 million non-cash asset impairment charge related to the decision to relocate the company's planned second satellite aluminum recycled slab center from Arizona to Columbus, Mississippi." The plant was to have been built at Benson, Arizona. **Caution on the corporate relationship:** the MDA release does not mention Steel Dynamics at all, *Magnolia Tribune* calls Aluminum Dynamics "a joint venture with Steel Dynamics," and Steel Dynamics' own filing treats it as the company's project. **[S]**

(b) SDI Biocarbon Solutions. Cadence Harvey, "Lowndes biocarbon facility creates 100 six-figure jobs," *The Commercial Dispatch*, 16 April 2026, https://cdispatch.com/news/lowndes-biocarbon-facility-creates-100-six-figure-jobs/ — the ribbon-cutting "to celebrate the opening of Steel Dynamics' new biocarbon facility off Artesia Road"; "The facility represents a $300 million investment, a portion of which was funded by a $246 million financial assistance package approved by legislators during a 2022 special session"; and, critically, "The facility was originally scheduled to open in November, though a flash fire, caused by a spark created while contract workers were vacuuming carbon dust, delayed its unveiling and injured two employees." Corroborated by Caleb Salers, "SDI Biocarbon Solutions opens $300 million facility in Lowndes County," SuperTalk Mississippi, 15 April 2026. On the expansion: Danny Levin, "Steel Dynamics

Looks to Strong Demand for Aluminum, Steel Operations," Industrial Info Resources, 28 January 2026, https://www.industrialinfo.com/iirenergy/industry-news/article/steel-dynamics-looks-to-strong-demand-for-aluminum-steel-operations–352553 — "Last summer, Steel Dynamics began construction on a $100 million expansion of the biocarbon production facility, which currently produces 160,000 tons per year of biochar… The expansion… will raise production to 480,000 tons per year. The initial project wrapped up in March 2025."

Three corrections. (1) The $100 million expansion broke ground in summer 2025, roughly nine months *before* the April 2026 ceremony, and was public in a January 2026 earnings write-up. (2) April 2026 is a ceremonial date, not a commissioning date — the plant's initial project "wrapped up in March 2025" and the ribbon-cutting was delayed from November 2025 by an industrial fire. (3) "$300 million" includes $246 million of state assistance and is not private capital. **A further caution:** "tripling output" is arithmetically exact on Industrial Info's pair (160,000 → 480,000 t/y) but three credible outlets give three different base capacities — the *Dispatch* says "roughly 200,000 tons," SuperTalk and GTR LINK say "228,000 metric tons," Industrial Info says 160,000. Finally, the plant is in Lowndes County off Artesia Road on about 90 acres — near Columbus, not in it. **[S]**

(c) PACCAR. Golden Triangle Development LINK (Katie Fenstermacher), "PACCAR celebrates grand opening of expanded Columbus operations," 11 March 2026, https://gtrlink.org/paccar-celebrates-grand-opening-of-expanded-columbus-operations/ — "PACCAR celebrated the grand opening and ribbon cutting of its expanded manufacturing operations in Columbus, Mississippi. The project represents a $209.4 million corporate investment and will create 100 jobs for the Golden Triangle"; "The expansion includes a 50,000-square-foot addition to PACCAR's existing engine manufacturing facility to support engine remanufacturing operations and ultra-clean engine production." Corroborated by Caleb Salers, "PACCAR celebrates opening of $209 million expanded site in Columbus," SuperTalk Mississippi, 12 March 2026. **Corrections:** the figure is **$209.4 million**, not $209 million; and the March 2026 event is a ribbon-cutting on a project **announced in October 2023** — Gov. Reeves in the same release: "In 2023, the company announced a $209 million investment to add remanufacturing operations at its Lowndes County facility – today that project comes full circle." Any tally that counts both the 2023 announcement and the 2026 opening double-counts. **[S]**

(d) Firehawk Aerospace. Golden Triangle Development LINK (Katie Fenstermacher), "Firehawk Opens 636-Acre Rocket System Integration Facility in Mississippi," 1 April 2026, https://gtrlink.org/firehawk-opens-636-acre-rocket-system-integration-facility-in-mississippi/ — "Firehawk Aerospace announced the opening of its 636-acre rocket system integration facility in Crawford, Mississippi on March 31, 2026"; "Located on 636 acres in Lowndes County…" Mississippi Development Authority (Ken Patterson), "Firehawk Aerospace to manufacture rocket systems in Lowndes County," 18 February 2026, https://mississippi.org/news/firehawk-aerospace-to-manufacture-rocket-systems-in-lowndes-county/ — "The project represents a corporate investment of $16.5 million and will create 100 jobs"; "The company recently **acquired** a facility — located on 636 acres in Crawford." **Corrections:** Firehawk bought an existing plant, it did not build one — its own December 2025 release is titled "Firehawk Aerospace Expands U.S. Rocket Manufacturing

with Mississippi Facility Acquisition." And the investment is **$16.5 million**, an order of magnitude below the other three; if these four are read as comparable industrial loads, Firehawk is not one. The 636 acres is site area, not building footprint. **[S]**

Three of the four "openings" are ceremonies for decisions taken earlier, and the fourth is a plant moved here from another state. 32. *Federal record.* TVA, *New Caledonia Generation Site Project*, 88 Fed. Reg. 83,202 (Nov. 28, 2023) (notice of intent) — "the proposed construction and operation of a Combustion Turbine (CT) Plant on a parcel of TVA-owned brownfield property in Lowndes County, Mississippi. The proposed New Caledonia Generation Site (NCG) would provide approximately 500 Megawatts (MW) of new generation capacity. The NCG CTs would be composed of six (6) natural gas-fired frame CTs." TVA, *New Caledonia Gas Plant Environmental Impact Statement*, 90 Fed. Reg. 11,202 (Mar. 4, 2025) (record of decision) — TVA adopted Alternative B, "the construction and operation of an approximately 500 megawatts (MW), dual fuel, simple cycle, frame combustion turbine (CT) facility on the NCG Plant property," referencing Final EIS Document ID EISX-455-00-000-1734008442. So the megawatt figure, the count of six, "simple cycle" and the county are all primary. **Note the record of decision says *dual fuel*, not gas alone** — the 2023 notice said gas-fired, the 2025 decision says dual fuel, and the chapter should not describe the plant as purely gas-fired.

Cost, schedule and site. Braden Simmons, "$800 million TVA energy plant 'breaks ground' outside Caledonia," *The Commercial Dispatch* (Columbus, Miss.), 23 October 2025, https://cdispatch.com/news/800-million-tva-energy-plant-breaks-ground-outside-caledonia/ — "The six-turbine site, which represents a nearly $800 million investment, is projected to add about 500 megawatts to the grid, enough to power about 250,000 homes"; "The project has a completion date of May 2028, and Moul said crews are currently on pace to meet that deadline"; the ceremony was "just outside the 145-acre construction site"; and the site "previously housed an Enron-owned gas powered plant," disassembled in 2007 after Enron's 2001 bankruptcy. TVA president and chief executive Don Moul and TVA chair Bill Renick attended, as did Mississippi Public Service Commissioner Chris Brown and Lowndes County board president Trip Hairston.

October 2025 is the ceremonial groundbreaking, not the start of construction. The *Dispatch*'s opening sentence is explicit: "While county, local and Tennessee Valley Authority officials ceremonially 'broke ground' Wednesday morning at the site of the New Caledonia Combustion Turbine Plant, the sounds of thrashing bulldozers and ongoing construction showcased the site is already well underway." Hairston, quoted: "they've already broken ground, and we see construction happening in full force."

The plant is **outside the town limits of Caledonia** — Mayor Betty Darnell in the same article says the plant "is technically outside Caledonia town limits." The chapter's "in Lowndes County" is right; "at Caledonia" would not be.

What is still not done. No MDEQ air permit and no Mississippi Public Service Commission filing has been retrieved. TVA as a federal instrumentality is not before the PSC for its own generation in any event, which is itself the chapter's point at note 33. The Final EIS has not been read; only the record of decision's summary of it, and the document ID above is the

retrieval key. TVA's Office of the Inspector General has published an "Independent Examination of Cost Proposal for New Caledonia Gas Plant," which has not been obtained and is the obvious primary check on the $800 million. **[P] for capacity, turbine count, fuel, simple-cycle configuration and county; [S[1]] for cost, schedule, acreage, the brownfield history and the state of construction Open item, Appendix F §F.1.** 33. The stated purpose is at notes 2, 3 and 23. That the loads at notes 31 and 32 do not appear in it is a comparison of those documents against each other; that the line "serves" those loads is the author's characterisation, and TVA has not said so. **[P] for the stated purpose; [I] for the comparison** 34. **[I]** — that the Golden Triangle article is the cleanest available demonstration is the author's judgement about the evidence, resting on notes 1 to 5. No systematic comparison of candidate articles was run. **Open item, Appendix F §F.1.** 35. **[I]** — the reading of what fills the disclosure gap, and the contrast with Maury County, are the author's. The Maury County case is at Chapter 11. Chapter 11 makes no such finding and names no such search, so the contrast drawn here rests on the absence of coverage this volume happened not to locate, which is not a searched negative and is not claimed as one. **Open item, Appendix F §F.1.** 36. Miss. Code Ann. § 77-3-11(2) (2025), quoted verbatim, emphasis added. Retrieved and read 17 Aug. 2026 at https://codes.findlaw.com/ms/title-77-public-utilities-and-carriers/ms-code-sect-77-3-11/ (current through 1 Jan. 2025) and cross-checked against https://law.justia.com/codes/mississippi/title-77/chapter-3/article-1/section-77-3-11/. The subsection's only express entity carve-out is for a joint municipal electric power agency. **[P]** 37. Miss. Code Ann. § 77-3-14(1) (2025), emphasis added: "Notwithstanding the provisions of Section 77-3-11 … and Section 77-3-13 …, no public utility or other person shall begin the construction of any facility for the generation and transmission of electricity to be directly or indirectly used for the furnishing of public utility service in this state … without first obtaining from the commission a certificate that the public convenience and necessity requires, or will require, such construction." Retrieved 17 Aug. 2026, https://codes.findlaw.com/ms/title-77-public-utilities-and-carriers/ms-code-sect-77-3-14/. **One limit stated:** the operative phrase is "generation *and* transmission," conjunctive, and subsections (2) and (3) address generation planning, so § 77-3-14 is most naturally read as the generation-construction provision. The section that plainly reaches transmission standing alone is § 77-3-11(2) at note 37, which is disjunctive — "generating, transmitting or distributing." The argument in the text does not depend on § 77-3-14. Section 77-3-14(6) exempts self-use generation, cogeneration and small standby facilities, and nothing else. **[P]** 38. Miss. Code Ann. § 77-3-13(3) (2025), emphasis added. Retrieved 17 Aug. 2026, https://law.justia.com/codes/mississippi/title-77/chapter-3/article-1/section-77-3-13/. The section is captioned "Issuance of certificates; temporary certificates; cancelability review upon change of ownership," and subsection (3) also requires the Commission to set the matter for hearing and to give reasonable notice "to all interested persons." **[P]** 39. That the Commission's certificate function operates as a route proceeding in practice is corroborated but not primary. Southern Cross Transmission LLC, a merchant HVDC developer, filed a route petition with the Mississippi Public Service Commission on 26 Apr. 2017, Docket 2017-UA-79, specifying a corridor across eleven counties. The account of that filing is from the company's own press release, https://www.prnewswire.com/news-releases/southern-cross-transmission-files-route-in-mississippi-300445875.html; **the docket itself was not pulled and the Commission's**

disposition was not checked. The Department of Energy's RAPID toolkit likewise classifies Mississippi as requiring a Commission certificate for transmission construction with a mandatory hearing, https://openei.org/wiki/RAPID/Roadmap/8-MS-c, which is a secondary compilation. The statutory limbs at notes 37 and 39 are primary and are what the argument rests on. **[S[1]] for the docket; [S] for the practice Open item, Appendix F §F.1.** 40. Tenn. Code Ann. § 65-4-101(6)(A)(i) (2025), quoted at Chapter 1 §1.2. **[P]** 41. Miss. Code Ann. § 77-3-3(a), (b), (d) (2025), retrieved 17 Aug. 2026, https://codes.findlaw.com/ms/title-77-public-utilities-and-carriers/ms-code-sect-77-3-3/, cross-checked against https://law.justia.com/codes/mississippi/title-77/chapter-3/article-1/section-77-3-3/. Paragraph (d)(i) brings within "public utility" the "generation, manufacture, transmission, distribution, provision, or furnishing of electricity to or for the public … for compensation." The full text of paragraph (d) was read; **the two "shall not include" sentences are the only exclusions it contains**, and neither concerns federal entities. This is a negative established by reading the whole section. **[P, negative]** 42. 16 U.S.C. § 831c(h), (i), (j) (2024) — TVA's power to acquire real estate for transmission lines, to exercise eminent domain in the name of the United States, and to construct transmission lines, none of it conditioned on state authorisation. The immunity principle and the requirement of a clear congressional waiver are from *Hancock v. Train*, 426 U.S. 167, 178–80 (1976), and *Mayo v. United States*, 319 U.S. 441 (1943), established at Chapter 1 §1.2; those cases are relied on here from Chapter 1 and were not re-read for this chapter. **[P] for the statute; [S] for the immunity reasoning as applied to Mississippi** 43. Miss. Code Ann. § 77-5-203(h) (2025) (defining "federal agency" for Chapter 6 Article 5 to "mean and include the United States of America, the President of the United States of America, Tennessee Valley Authority," and other federal instrumentalities); Miss. Code Ann. § 77-5-257 (2025), captioned "TVA jurisdiction," added by Laws 2016, ch. 387 (HB 1139), § 22, eff. 1 July 2016, retrieved 17 Aug. 2026, https://law.justia.com/codes/mississippi/2025/title-77/chapter-5/article-5/section-77-5-257/. The section declares that the Commission and political subdivisions "shall not have jurisdiction over and shall not regulate those portions or aspects of a corporation's operations, facilities, services, or rates that are regulated by the Tennessee Valley Authority," and that in a dispute over the scope of TVA's authority "the commission shall defer to TVA's asserted authority unless and until the commission has obtained a favorable, final, and nonappealable declaratory judgment against TVA." **The reading in the text is the narrow one and is the correct one:** Article 5 of Chapter 6 governs electric power associations, and "a corporation" in § 77-5-257 means a corporation "formed or operating under this article," i.e. a distributor cooperative. The section is a distributor-side deference provision. It is not a TVA-side exemption, and it does not mention transmission construction. **[P]** 44. **What was not found, stated as a negative.** No Mississippi statute, Public Service Commission order or reported decision addressing whether TVA must obtain a Mississippi certificate for a transmission line was located. The search was of free sources — Justia, FindLaw, the Commission's website and general search — and did not include Westlaw or Lexis, so an unreported chancery ruling or an older Commission order would very likely not have surfaced. This is an absence of located authority, not a confirmed absence of authority, and the conclusion in the text rests on the statutory reading and the federal immunity principle rather than on any Mississippi holding. **[P, negative] Open item, Appendix F §F.1.**

PART V — WHAT REMAINS

Chapter 14 — What This Volume Could Not Resolve

The records handbook is published separately as Getting the Record: A Guide to Requesting TVA Transmission and Siting Documents, *version 1.0, 14 September 2026; concept DOI 10.5281/zenodo.21997372, version 1.0 DOI 10.5281/zenodo.21997373.*

14.1 Why the gaps are listed

A volume built on published records inherits the shape of what was published. Where TVA published nothing, this volume has an absence, and an absence can be reported two ways. It can be smoothed into the prose, where a reader will not see it. Or it can be named, so that the next person to work on this knows exactly where the floor gives way.

What follows is the second. Each item states what is missing, what it would settle, and by what route it could be obtained. The companion guide sets out the request language; this section says why the requests are worth sending.

14.2 The six projects with no located determination

Appalachia Area Improvement at 25.2 miles, West Tennessee at 21 to 24, Lexington–Jacks Creek at 15.83, Dickson at about 14, Waldens Creek, and 109 North have no categorical exclusion determination, no environmental assessment and no impact statement located anywhere in the 11,899 register entries.[1] Three of the six are the three longest projects in the census, and a fourth, Dickson, is the fifth longest.

Three readings survive the evidence. The determination exists and is not in the published register. The determination exists under a project title this volume did not recognise. Or no line-level determination was made. The register does not distinguish them, and this volume does not guess.

What would settle it: the checklists themselves, which TVA has never published. The register establishes *that* an exclusion was applied and *when*, and nothing about the mileage counted, the acreage credited, or the extraordinary-circumstances screen. For the nine projects that do have a determination, eleven checklist identifiers are known and citable. A refusal to produce eleven documents TVA has already told the public it completed is itself a finding.

14.3 Why some projects get a page and some do not

Ultium – Night Sky has a categorical exclusion determination, a completed line, and no project page.[2] Columbia (Fiberon) has a page so thin it carries no map, no schedule and no mileage. North Gallatin has the full apparatus. Nothing located explains the difference.

This is the question on which the volume's central comparison most depends, and it is the one this volume cannot answer from published records. It may be a content-management default. It may be a threshold in mileage, cost, or parcel count. It may be discretionary. **A mundane explanation would be as valuable as a damning one**, because it would force the argument to distinguish institutional intent from institutional output — and the volume's claim is about output.

14.4 The confidentiality question, still open

Chapter 10 establishes that the identity of the North Gallatin customer was publicly known, contemporaneously reported, and confirmed to a newspaper by TVA's own spokesperson while the comment period ran.[3] It does not establish that no contractual restriction existed, because no agreement between TVA and any customer has been examined.

If such an agreement exists, the disclosure asymmetry has a mechanism. If none does, it does not. Either finding improves the analysis. The request is for economic development agreements and any non-disclosure agreements covering Tennessee service of 75 megawatts or greater.

14.5 The easement question behind Chapter 9

Chapter 9 shows that Tennessee's tax-equivalent formula distributes payments to counties on factors in which a transmission corridor's host county does not appear.[4] What it does not establish is how transmission easements are treated in the property and acreage factors, because the underlying valuation records were not obtained.

Until they are, the chapter states what the located formula demonstrably omits rather than that a host county receives nothing. That is the claim the record supports.

14.6 The ten dollars

The figure appears six times in this volume and rests on a newspaper's quotation of a filed document.[5] The Cheatham condemnation docket is a public federal court record and the filing costs about ten cents to retrieve. No case number is recorded anywhere in this volume's files, so the retrieval starts from the court, the filing date and the party: U.S. District Court for the Middle District of Tennessee, complaints filed on behalf of TVA on 20 August 2024, before Judge Aleta Trauger.

The innocent reading should be stated wherever the figure appears: a nominal sum for a temporary right of entry to survey is ordinary federal condemnation practice, the landowner keeps the land, and damage is separately compensable. The figure is arresting because of what it says about the ratio between the institution and the household, not because it is irregular. Pulling the filing would let the volume cite the document rather than the report of it.

14.7 The denominator, and what closed it

Sixteen of eighteen pages naming no customer is evidence of withholding only for projects that had a customer to withhold.[6] A search of independent public records — state economic development announcements, county and municipal minutes, industrial development board records, local reporting — classified all eighteen projects by driver. **Three had a specific identifiable end-use customer demonstrable from independent public records. Eleven have a positive, locatable general driver.** One, West Tennessee Power System Improvements, has a specific development site rather than a company: BlueOval City at the Memphis Regional Megasite, where the end-use load of this particular line is two rural cooperatives. Three returned no evidence either way, North Dayton among them once its inference-dependent grading is set aside. Three, eleven, one and three make eighteen.

The fourth candidate does not meet the matrix's own rule and is excluded here. North Dayton was graded as having a nameable customer on the strength of Nokian Tyres, but the only document linking that customer to that line is TVA's own project page — and the matrix expressly excludes TVA's own publications as non-independent, because the whole question is what independent records establish that TVA could have named. Applying the rule as written, it is **three**.[10]

And the eleven is a floor rather than a ceiling. A general driver was recorded where one was located; it does not establish that no customer existed. A project can have both. So the count of nameable customers **cannot fall below three and is not bounded above at four** — a more thorough search of county and municipal records could raise it. What the matrix establishes is that the number is nowhere near eighteen, which is what a practice claim would require.

The general practice claim is therefore unavailable. What the record supports is smaller and much harder to attack: *of the three projects with a nameable customer, TVA named one, and in both unnamed cases the name was already public before TVA wrote the page.* The eighteen-page census keeps its work, which is the measurement of a template, and is not asked to prove a practice it cannot reach.

Two items in the matrix remain open. Dickson and Tullahoma returned no independent evidence of a driver. And a search summary linking 109 North to the Gallatin data centre could not be verified, because the underlying articles returned empty bodies; it is recorded as unresolved and is not counted.

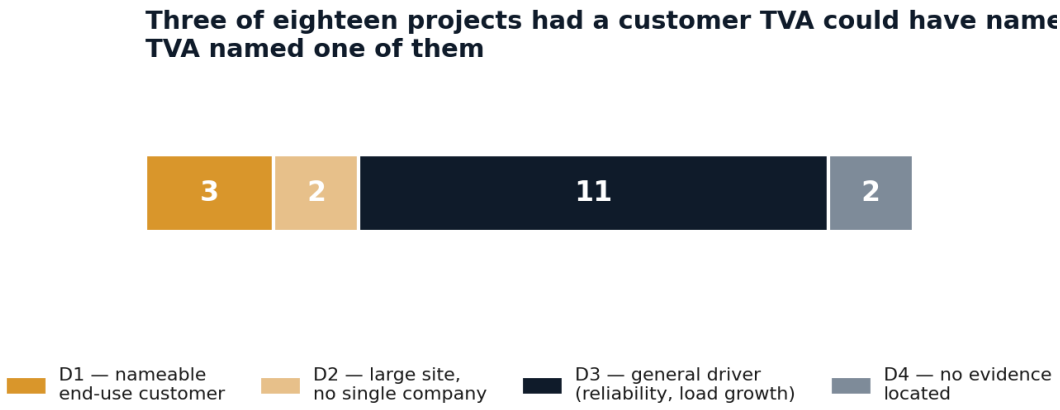


Figure 4. *All eighteen Tennessee projects classified by driver from independent public records. The count of pages naming no customer is not a count of customers withheld.*

14.8 The Virginia comparison, and what the dockets show

Eighteen Dominion Energy Virginia project pages were coded against this volume's own three codes, and the result changed the argument.[7] Dominion, which files a full adversary certificate case, names an end-use customer on none of the eighteen pages. The causal claim that the missing forum produces the missing name does not survive it.

The comparison is a purposive sample of one investor-owned utility, not a census. **A second investor-owned utility is the highest-value single piece of research now outstanding on this question**, because Dominion's pages are visibly templated and one template is not a practice. Appalachian Power operates in both Virginia and Tennessee and is the obvious candidate.

The Virginia count now has its denominator. The dockets behind all eighteen pages were read from the State Corporation Commission's document store on 2 October 2026. Eight of the eighteen describe a large-load customer: seven as the driver of the project, and White Oak as a load its application keeps separate from it. Eight have no single customer to name: rebuilds, NERC reliability violations and area load growth. Two, Gainesville–Wheeler and North Anna–Bristers, have no case yet. The pages name none of the eight customers. The filings name the customer in three, Culpeper Tech Zone, White Oak and Tributary, though White Oak's application states that the QTS load "is a separate, unique driver from the proposed Project." Technology Boulevard serves two customers, which Staff testimony calls "Customer A" and "Customer B"; the application correspondence titles the project "QTS RIC Phase 4," which points to QTS for at most one of them. Nebula–Raines carries a name only from public commenters. Three, Nimbus, Cirrus–Keyser and Hornbaker–Devlin, remain unnamed in every public filing. All eight dockets put a number on the customer load, seven in megawatts and Nimbus in MVA. No Dominion page states a megawatt figure, and no TVA page does either.[8]

The forum is where the name appears, when it appears. The page is silent in all eight cases; the docket names a customer in three and points to one in a fourth. Consent does not explain the pattern. The only consent language in any filing is Culpeper's, which records that all three customers "have provided consent for identification in this filing"; Tributary and White Oak name their customers without it, and the three unnamed dockets anonymize without saying why.[8]

Two of the eighteen cut against the pointer reading. Aspen–Golden and Loudoun–Ox carry no SCC case number. Both are completed proceedings, which is more consistent with the case number being live-project communication that lapses when the project closes than with a page built as a record locator.[9]

14.9 Two reading gaps, stated because they are load-bearing

Welton, Phillips and Luke is the prior work this volume positions itself against, and that gap is closed. The published Essay was retrieved from the Iowa Law Review PDF and read end to end on 16 August 2026 — pp. 2233–2276, all four Parts, 295 footnotes — with zero occurrences of siting, eminent domain, condemnation, corridor, right-of-way, routing or land acquisition, and one occurrence of "data center," at note 233.[11] The positioning claim rests on a complete read.

Durant, Fitzgerald and Thomas, *When Government Regulates Itself*, is verified as to citation and unread as to argument.[12] Its title is very nearly this volume's subject.

14.10 What was not asked of TVA, and why

Nothing was asked of TVA, and that is a decision.

This is a scholarly monograph. It does not seek right of reply, and the standard it works to is set out at `Citation_Standard_v0_1.md` §7. Every claim this volume makes about TVA's published disclosures rests on a document TVA itself published, retrieved at a stated time. Twenty-nine such files sit in the fifty-eight-file deposit, seventeen more among the captures at Appendix D §D.9, and one at §D.10, pending the next version of the deposit. The exceptions are the Internet Archive retrievals at Chapter 6 notes 44 and 48, which are recorded and not hashed. A claim of that kind is not made more reliable by a spokesperson's characterisation of it, and it is not made less reliable by silence.

Three questions would nonetheless close gaps this volume cannot close from published records, and a later researcher may want them:

1. What determines whether a transmission project receives a public project page and a virtual open house? **This one now has a live instance rather than only a hypothetical.** On 23 August 2026 a check of TVA's own public map services found a Roane County, Tennessee transmission project with thirty-eight numbered alternative route segments and two hundred and twenty-two identified affected tax parcels,

whose virtual open house resolved from `tva.com/virtual/roane-county` and whose comment form had been modified within the preceding three weeks. It has no project page at any of the three paths TVA uses, no entry on either index, and no NEPA listing or press coverage located by the searches described at Appendix A. Stated as a search rather than as a fact: nothing establishes that its property owners were not written to, only that TVA has published nothing about the project that free routes could find.

2. Does TVA maintain guidance on naming end-use customers, load types, or project codes in project pages, ArcGIS item records, and categorical exclusion records?
3. Was any agreement or confidentiality restriction relevant to naming the customer on the North Gallatin project page, and if so, how did it permit the spokesperson's contemporaneous statement to the *Gallatin News*?

Each is answerable in a sentence and each is factual rather than characterising. **None was sent.** A reader should therefore treat every alternative explanation this volume leaves open as genuinely open, rather than as one TVA declined to address. The companion guide sets out the records-request route, which produces a document rather than a statement and is the instrument this volume prefers.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S^{1}] single source, [I] author inference.

1. Chapter 3 §3.2 and note 8. The six are identified by their absence from all 11,899 register entries retrieved 17 Aug. 2026; the search universe, terms and truncation cautions are at Chapter 3 note 5. Stated as not located rather than as non-existent. **[P, negative] Open item, Appendix F §F.1.**
2. Chapter 11 and Chapter 3 §3.2, CEC 47184, closed 11 Aug. 2022. **[P]**
3. Chapter 10 §§10.1 and 10.3, and notes 2 and 26. **[P]**
4. Chapter 9 §§9.3–9.5. The open item is designated T8 in the companion guide. **[I] Open item, Appendix F §F.1.**
5. Chapter 2 §2.4 and Chapter 12 §12.4. Chapter 12 note 1 records that the docket has not been pulled and that no case number appears anywhere in this volume's files; the court, the filing date and the judge are at Chapter 2 notes 22 and 24, on the same single article's authority. **[S^{1}]** — one newspaper's quotation of a filed document. **Open item, Appendix F §F.1.**
6. `Tennessee_Volume_Driver_Matrix_v0_1.md`, 18 Aug. 2026, with per-project citations and search universe. **[P]**
7. `Tennessee_Volume_VA_Falsification_Test_v0_1.md`, 18 Aug. 2026; eighteen page captures deposited. **[P]**
8. Virginia State Corporation Commission docket document store, read 2 October 2026 against the eighteen deposited page captures, `DOM_page_capture_*_20260818.txt`. Large-load customer: Culpeper Tech Zone, PUR-2025-00032, Vol. 1 Application, DocID 381853, p. 7 (customers named; consent statement) and p. 20 (140 MW by 2028; 943

MW by 2034); White Oak, PUR-2023-00110, Vol. 1 Application, DocID 364262, pp. 22–23, 32 (QTS; 156 MW in 2024; p. 22, the QTS load "is a separate, unique driver from the proposed Project"); Tributary, PUR-2024-00181, Vol. 1 Application, DocID 375414, pp. 6–7, and Attachment I.A.2, DocID 375415, p. 6 (SpotsyTech Campus; "just under 300 MW"); Technology Boulevard, PUR-2025-00042, Vol. 2 Application, DocID 378729, pp. 42, 53, 56 ("QTS RIC Phase 4"), Staff testimony, DocID 382443, p. 8 ("Customer A" and "Customer B"), Order for Notice and Hearing, DocID 379304, p. 3 (300 MW for each customer); Nebula–Raines, PUR-2025-00014, public comments, DocID 381694, p. 7, Report of the Senior Hearing Examiner, DocID 382737, p. 4, and DocID 381748, p. 11 (221 MW by 2030); Nimbus, PUR-2022-00027, DocID 309551, p. 8 (90 MVA); Cirrus–Keyser, PUR-2022-00198, DocID 359187, p. 8 (61 MW by 2024; 320 MW by 2034); Hornbaker–Devlin, PUR-2025-00046, DocID 378870, p. 8 (300 MW at full build-out). No single customer: PUR-2022-00183, PUR-2026-00021, PUR-2026-00050, PUR-2023-00023, PUR-2024-00074, PUR-2025-00154, and the two at note 9. No case: SCC case captions searched for Gainesville, Wheeler, North Anna and Bristers; the only match, PUR-2020-00080, is a different project. In the three unnamed dockets every public document was read, with image-only pages read by OCR; a name on a poor scan could be missed, and whether a sealed filing identifies the customer cannot be determined from the public docket. **[P]**

9. Aspen–Golden, PUR-2024-00032, Final Order, 6 February 2025, DocID 378096, p. 3 (load growth in the eastern Loudoun load area and NERC reliability violations); Loudoun–Ox, PUR-2019-00128, Final Order, 2 June 2020, DocID 216726 (structural integrity and reliability). Neither page carries the case number, on the deposited captures retrieved 18 Aug. 2026. **[P for the orders and the absence on the pages; I for the reading]**
10. `Tennessee_Volume_Driver_Matrix_v0_1.md` §2.4 sets the independence rule and §3 applies it. North Dayton / Nokian Tyres rests on TVA's project page alone; no state, county, municipal or industrial-development record linking that customer to that line was located. **[P, negative for the independent record; I for the exclusion]**
11. Shelley Welton, Levi Phillips & Nikki Luke, *"Not Just Another Utility": The Tennessee Valley Authority and Public Power in the Energy Transition*, 110 Iowa L. Rev. 2233 (2025). Read end to end 16 Aug. 2026 from the Iowa Law Review PDF, pp. 2233–2276, all four Parts and 295 footnotes; zero occurrences of siting, eminent domain, condemnation, corridor, right-of-way, routing or land acquisition, and one occurrence of "data center" at n.233. **[P]**
12. Robert F. Durant, Michael Fitzgerald & Larry W. Thomas, *When Government Regulates Itself: The EPA/TVA Air Pollution Control Experience*, 43 Pub. Admin. Rev. 209–219 (1983), DOI 10.2307/976329. Citation verified against Crossref and OpenAlex; text closed access and not read. **[P for citation; not read] Open item, Appendix F §F.1.**

Chapter 15 — What the Record Shows

15.1 What the record shows, at the size it will bear

A federal corporation builds transmission lines across seven states, and no external body decides whether any of them are needed or where they go.

That is the institutional fact, and everything else in this volume is downstream of it. There is no certificate proceeding. There is no docket. There is no party with standing to contest need or route, no record that survives independent of the institution that made it, and no forum in which a landowner can compel a hearing before their land is taken. Virginia has all of those. Tennessee has none of them, and the difference is statutory rather than temperamental.[1]

What fills the space is disclosure: TVA choosing what to publish and in what form. This volume measures what it chose, and does not explain why.

The measurements are these. Across eighteen Tennessee project pages, sixteen state a purpose naming neither an end-use customer nor a load type, and not one of the eighteen states a megawatt figure. One page names its customer. TVA's own engineering records, published on the same public infrastructure and reachable without a credential, carry customer names in their file names. One service is called `Facebook_North_Gallatin_Alternative_Transmission_Line_Route`. It has been public since December 2020, and it belongs to a project whose landowner-facing page says the line is for "growing load."[2]

That is a difference between two channels of the same institution's record, demonstrated inside its own files, with a within-institution contrast: Fiberon is named in both channels, Facebook in only one.[3]

15.2 What the volume establishes, in order of how hard it is to argue with

The pages are countable and they have been counted. Eighteen pages, one field, three codes, every purpose statement reproduced verbatim in Appendix A so a reader can re-code them. Sixteen name neither. Zero megawatts, checked page by page. All eighteen carry `meta-robots: noindex` and a canonical tag pointing away from themselves. Eight of eighteen tell owners how many of them there are, and those eight are all projects opened before 2024.[4]

The environmental determinations are now citable. TVA publishes registers of completed categorical exclusion checklists — eight documents, 11,899 entries, April 2020 to March 2026. Nine of the eighteen projects have a located line-level determination and every one is exclusion 16 — eleven register entries between them, because North Gallatin

and Tullahoma each carry two. Two received full environmental assessments instead, and both are over the ten-mile threshold, which is evidence that TVA observes its own ceiling. Six appear nowhere at all; three of those six are the three longest projects on the list, and a fourth, Dickson, is the fifth longest. The eighteenth is Columbia (Fiberon), whose determination is probable and not established.[5]

The corridor burden is measurable from TVA's own geometry. 2.63 miles of route studied for every mile selected, across the forty-six identifier groups appearing in both published layers, with a median project ratio of 2.61. Thirty-three further groups have studied corridor and no selected route, of which twelve are genuinely unresolved once the built and the split-identifier cases are removed.[6]

The fiscal structure does not follow the corridor. The federal payment apportions by state. Tennessee redistributes by population, land area, and acres of TVA-*owned* land. A right of way is an easement. The one construction-impact payment is written for "facilities to produce electric power," which a transmission line is not.[7]

And the record is unstable. Every artifact this volume relies on sits on servers TVA controls and can revise without notice. That is why the evidence is deposited with a DOI, why Appendix D records the date on which this volume's own archive claim became true, and why §D.9 and §D.10 record the twenty captures for which it is not yet true.[8]

15.3 What is inference, and marked as such

The volume does not claim that the difference between the GIS name and the page text tracks who is reading. Three things go against that reading and together they are decisive. Both records are public, so the difference is between what is discoverable and what is published where affected people are directed to look, which is not the same as addressing two audiences. The customer's name was in a newspaper while the comment period ran, TVA mailed the owners directly, and TVA's own newsroom names the Gallatin data centre. And only three of the eighteen projects had a nameable customer at all, so there is no population across which a disclosure rule could be operating.

The claim it makes instead is about channels rather than audiences, and it is a finding rather than an inference. TVA's engineering catalogue sometimes preserves a customer identity that the project page omits. Where that happens, nothing a property owner is sent to supplies it, because TVA files no siting case and what stands in its place is an open house that leaves no record. Other public records may carry it, and Chapter 11 is the case where one did.

Two things in this volume are readings rather than findings, and the notes say so wherever they appear. That the accumulation of route alternatives in the register records successive rounds of reconsideration is the author's explanation, not TVA's.

And that the Fiberon page names its customer *because of* anything in particular is not established. The volume declines to choose between the two available readings and says so in the chapter where a first-time reader meets the pair.[9]

15.4 What is not proven, stated so nobody has to guess

No formal policy. Nothing in the record establishes that TVA has a rule, written or unwritten, about naming customers on project pages. What is established is that the engineering records name customers in the cases examined, and that the pages a property owner is directed to are near-uniformly silent. Three cases are not a practice, and Chapter 14 §14.7 sets out why the practice claim fails for want of a denominator.

No motive. The volume makes no claim about why. It has not been established that anyone at TVA decided to withhold anything.

No single customer for North Gallatin. TVA's spokesperson said the line would serve many customers "including" the data centre. That is an inclusion, not an identification, and the volume quotes it exactly.

No unannounced tenant anywhere. Not at the CINCO Megasite in Lowndes County, not behind 109 North's 500-kV-capable towers, not in the fourteen counties of TVA's generation siting dataset. Every one of those is an absence of located evidence, and each is stated as the search that failed rather than as a fact about the world.

No illegality. Every practice described in this volume is within TVA's authority. That is the point of the book, not a caveat to it.[10]

15.5 Why a missing docket is not merely fewer documents

It would be possible to read this volume as an argument about paperwork. It is not.

A certificate proceeding does four things that publication cannot do, and the difference shows up in Chapters 2, 10 and 12.

It creates a party. In Virginia, an interested party, defined to include anyone owning property in an affected locality, can *compel* a hearing. In Tennessee a landowner can attend a thirty-day virtual open house and submit a comment. If the line is categorically excluded, no environmental document follows for a response to appear in; if TVA prepares an assessment, its revised procedures oblige it to respond there only to comments it judges substantive.[11]

It creates a record that outlives the institution. Anyone can retrieve a Virginia certificate case a decade later. Nothing in this volume can be retrieved from anywhere but TVA's servers and a deposit this author made, which is a strange sentence to write about a federal corporation.

It forces the reasoning into the open. TVA publishes that an exclusion was applied and when. It does not publish the mileage counted, the acreage credited, the extraordinary-circumstances screen, or the name of anyone who signed. A reader cannot check the work, and neither could this volume.

And it comes before the taking. The one hearing a Tennessee landowner is guaranteed occurs after title has passed, and it is about the amount. In August 2024 TVA filed for temporary access to two families' land in Cheatham County, estimating compensation at ten dollars, for a transmission project whose environmental impact statement was never published. It was attached to a generation project no longer sited there, justified in turn by a coal retirement now under review for a longer life.[12]

Nothing in that sequence was unlawful. Every step was within authority. What is missing is the place where somebody outside TVA would have had to be persuaded.

15.6 What would change it

Seven things follow from the findings, and none requires new legislation except the last.

Publish the checklists, not just the register. TVA already tells the public that a determination was made. Publishing the completed checklist behind it — mileage, acreage, the extraordinary-circumstances screen, the approving official — would cost nothing and would make the nine determinations behind eleven register entries checkable, which they currently are not.

Say what the line is for. TVA wrote two sentences naming Fiberon, its product, its job figure and its street. The same two sentences are available for every project. Where a customer's identity is genuinely restricted by agreement, say *that*, and say which agreement.

Publish a load figure. Not one of eighteen pages carries a megawatt number. A range would do.

Restore the owner count. Eight pages used to tell property owners how many of them there were. It stopped after 2023 and no explanation was published.

Make the pages findable at the address TVA advertises. Remove `noindex` from the project directory, make each project page canonical to itself rather than to its parent or to a legacy sibling, and link the environmental document where one exists. North Dayton has an assessment and its own Environmental Reviews section does not mention it.

Produce a response document. Thirty days of comments that generate no reply is not participation. A comment summary with responses is the minimum a docketed proceeding would require, and TVA's January 2026 rule moved in the opposite direction.

And tie something to location. A host county that absorbs fifty miles of corridor is, at every stage of the payment calculation, indistinguishable from one that absorbs none. That is a legislative question rather than an administrative one, and it is the only recommendation here that Congress or the Tennessee General Assembly would have to reach.

15.7 What is left for whoever comes next

This volume was assembled from public sources by one person, independently of any institution, with no records requests and no cooperation from anyone. The research and the writing are the author's own; his advisory board service is disclosed in the front matter and had no part in this work. That is a fact about the sources. The quantity of land entering a federal corporation's siting process has been publicly computable the whole time, and was not computed.

What could not be reached from outside is specific and short. The checklists behind the nine determinations, which produce eleven register entries. The filed document that carries the ten-dollar figure. Whether transmission easements enter the state property factor. Whether any agreement restricts TVA from naming a customer. Six projects with no located environmental determination of any kind. And the answer to a plain question nobody has put to TVA in writing: what determines whether a transmission project gets a public page.

The companion guide sets out how to ask, under which statute, with which clocks, and what to expect when the answer is no. *Faizer v. TVA* is the worked example: a Tennessee journalist, counsel from the Reporters Committee, a FOIA request TVA fought for nearly two years, and records that came out anyway.[13]

The register is public. The geometry is public. The determinations are public. What is not public is the reasoning, and nothing in the structure described in Chapter 1 requires TVA to make it so.

Endnotes

Grades: [P] primary, [S] corroborated secondary, [S¹] single source, [I] author inference.

1. Chapter 1 §§1.2–1.4 and §1.8, and the authorities cited there. **[P]**
2. Chapters 4, 5 and 6, and Appendix A. **[P]**
3. Chapter 6 §§6.4–6.5. The term "within-institution contrast" is used in preference to "matched control," which borrows experimental language the evidence does not earn. **[P for the pair; I for the reading]**
4. Chapter 4 §§4.3–4.5, Chapter 5 §§5.1–5.6, Appendix A. **[P]**
5. Chapter 3 §§3.2–3.4 and its notes 5–13; underlying research at `TVA_CE_Determination_Research_v0_1.md`, independently verified. **[P]**
6. Chapter 8 §§8.3–8.6, Appendix C. The figure is computed over identifier groups appearing in both layers, not over TVA's whole portfolio. **[P]**
7. Chapter 9 §§9.2–9.3A. **[P]**
8. Appendix D, especially §§D.1 and D.6. **[P]**
9. Chapter 5 §5.3, Chapter 6 §6.5, Chapter 8 notes 22 and 25, Chapter 10 §10.5. **[I]** in each case, marked at the point of use.

10. The volume's disclaimers are set out at the Introduction, "What this volume does not claim," and are restated here so the conclusion does not quietly widen them. **[P]**
11. 18 C.F.R. § 1318.500(c), (e) (2026); Va. Code Ann. § 56-46.1(D) (2026). Chapter 1 §1.8, Chapter 2. **[P]**
12. Chapter 12 §§12.1 and 12.3. The ten-dollar figure rests on a newspaper's quotation of a filed document the volume cannot identify; the docket has not been pulled, and that limit is stated at Chapter 12 §12.1 and at Chapter 2 notes 22 and 24. **[S[1]] Open item, Appendix F §F.1.**
13. The companion guide §3A. *Faizer v. TVA*, No. 3:24-cv-00190 (E.D. Tenn.), dismissed by stipulation 13 Mar. 2026 after TVA released records previously withheld under Exemptions 4 and 5. **[P]**

Appendix A — The Tennessee Project Census, Coded

Retrieval date: 16 August 2026. **Source:** TVA's published transmission project pages (`tva.com/energy/transmission/transmission-projects`, individual project pages) **Population:** 18 project pages, coded on fields A–M

What the population is, and what it is not. The eighteen are every Tennessee project on TVA's published transmission project index, which carried forty-one listings of forty projects across five states on the retrieval date. They are a complete census **of that index**. They are not a complete census of TVA's Tennessee transmission projects. A test of the inclusion rule on 23 August 2026 found live TVA project pages, and live consultation infrastructure, at paths the index does not link. Three are in Tennessee. **The Middle Tennessee Generation and Transmission Capacity Expansion page** is live at `/transmission-system-projects/` and the index does not link it, as Chapter 4 §4.6 and Chapter 12 §12.4 record; it is outside the coded census because it is a generation page, not because it is unlisted. The other two are **Horn Lake–Freeport**, whose page sits at `/transmission-system-projects/` with an open house of 2 August 2018, and **Roane County**, which has no page at any path and whose virtual open house was taking comments on the date of the check. Blue Ridge, Georgia and Harding Spring–Gladstone, Alabama are the same case in other states, and the index's state-grouped sibling renders its Georgia and Virginia headings empty while a Georgia project page is live. TVA serves project pages at three different paths that return different vintages of the same text. Every count in this appendix is a count over the indexed eighteen, and the index is not the whole.

All eighteen pages were fetched successfully on the retrieval date. None returned a 404 and none redirected — every URL resolved to itself. One page (Waldens Creek) required a second fetch using URL-encoded parentheses; the first attempt returned a degraded text-only rendering with the metadata header block and the map embed stripped, and the coding below reflects the second, complete fetch.

Page captures for **all eighteen** projects are in Zenodo deposition **21959989**, with per-file SHA-256 at Appendix D. The deposition was published 18 August 2026: version 1.0 DOI 10.5281/zenodo.21959989, concept DOI 10.5281/zenodo.21959988 (Appendix D §D.7). Three were captured on 16 August 2026 and the remaining fifteen on 17 August. Two further captures in the deposit, Belmont Stage 2 and Middle Tennessee Generation and Transmission, are not Tennessee census pages.

Coding fields, as applied throughout:

Field	Content
A	Stated purpose, verbatim, per update block
B	Customer naming — end-use load, interconnection counterparty, or neither
C	Owner/parcel count sentence
D	Route mileage
E	Existing-vs-new right-of-way split
F	Right-of-way widths
G	Local power company / distributor
H	Update stamps
I	Project schedule table
J	Map section and webmap ID
K	Contact engineer
L	`meta-robots` and `canonical` values
M	Any megawatt figure

A.1 Summary table

Project	County	Names a customer	Owner/ parcel count	Existing-vs-new split	Route miles	MW figure
1. 109 North	Sumner	no	ABSENT	no (both types named, no split)	3.85 (also 3.34; 3.2–6.3)	ABSENT
2. Appalachia Area	Polk TN / Cherokee NC	no	345 / 446	yes — 13–14 existing / 13–14 new	25.2 + 0.4	ABSENT
3. Bristol (South Bristol)	not stated	no	346 / 524	no	10.8 + 3.4	ABSENT
4. Cates Landing	Lake	no	37 / 62	no (all new)	3.73	ABSENT
5. Columbia (Fiberon)	Maury	**yes — Fiberon (end-use load)**	ABSENT	no	ABSENT	ABSENT
6. Dickson	Dickson / Hickman	no	237 / 322	yes — 4.5 existing / 8.5 new	~14	ABSENT
7. Fall Creek	Wilson / Rutherford	no	ABSENT	no (all new)	2.99	ABSENT
8. Gallatin (North Gallatin)	Sumner	no	165 / 225	yes — per route	5.7 (range 5.7–7.1)	ABSENT
9. Hardin Valley	Knox / Loudon	no	198 / 325	no (all new)	5.4	ABSENT
10. Lewis Chapel	Sequatchie	no	63 / 82	no (all new)	6.61	ABSENT
11. Lexington	Henderson / Chester	no (unnamed “customer connections”)	ABSENT (stem present, numbers stripped)	no (all new)	15.83	ABSENT

Project	County	Names a customer	Owner/ parcel count	Existing-vs-new split	Route miles	MW figure
12. North Dayton	Rhea	no (Nokian Tyres named as land crossed)	ABSENT	yes — ~8 existing / ~4 new	12	ABSENT
13. Riceville	McMinn	no	ABSENT	no (all new)	1.3	ABSENT
14. Tiny Town Road	Montgomery TN / Christian KY	no	ABSENT	yes — 100% existing, easements N/A	1.5	ABSENT
15. Tiptonville–New Madrid No. 2	Lake	**yes — AECI (counterparty)**	ABSENT	no (existing, widened)	6.8	ABSENT
16. Tullahoma (Center Grove)	Franklin	no	78 / 103	no (all new)	3.7 (range 2.3–3.7)	ABSENT
17. Waldens Creek	Sevier	no	ABSENT	no (all new)	3.01 (range 2–4)	ABSENT
18. West Tennessee Power System Improvements	Fayette / Haywood / Tipton	no	ABSENT	partial only (10–12 new stated)	21–24	ABSENT

Notes on the table's coding decisions, which matter for the counts in §A.2:

- **Bristol** never names a county anywhere on the page; "not stated" is literal. (Bluff City and Blountville are in Sullivan County, but the page does not say so.)
- **North Dayton** gives its county only incidentally, via the location of the North Dayton 161-kV Station "in Rhea County"; the purpose sentence says only "the Dayton area."
- **Lewis Chapel** is coded to Sequatchie County per the purpose sentence; the page also mentions Bledsoe County as part of SVEC's service territory.
- **North Dayton is coded "no" under *Names a customer*.** Nokian Tyres appears on the page, but only as property the line crosses. The page nowhere states the project serves Nokian Tyres.

- **Tiny Town Road is coded "yes" under *Existing-vs-new split*** because the page states the line is built entirely on existing vacant TVA right of way and its schedule table records easement purchases as N/A. This is a split of 1.5 / 0, stated unambiguously, and is counted as a split.
- **West Tennessee is coded "partial", not "yes".** The page states the new-right-of-way portion (10–12 miles Stanton to Mason) and separately describes an 11.5-mile existing 69-kV line to be rebuilt, but never presents these as an existing-vs-new split; overall it says only "centered on a combination of existing and new right of way." It is therefore **not** counted in the five.

A.2 Counts

Computed from the coded extraction, page by page.

1. **Name a specific end-use customer: 1 of 18.** Columbia (Fiberon). Fiberon is named as the load the project exists to serve.

2. **Name an interconnection counterparty instead: 1 of 18.** Tiptonville–New Madrid No. 2 (Associated Electric Cooperative, Inc.). AECI is a utility across the Mississippi River, not an end-use load.

3. **Name neither: 16 of 18.** This includes North Dayton, which names Nokian Tyres solely as property crossed and never as a reason for the project. The other fifteen name only distributors, municipal utilities, or cooperatives — or, in two cases (Cates Landing, Lexington), name no utility and no company at all.

4. **Carry the owner/parcel sentence with counts: 8 of 18.** Appalachia, Bristol, Cates Landing, Dickson, Gallatin, Hardin Valley, Lewis Chapel, Tullahoma.

   - **Total property owners across those eight: 1,469.**
   - **Total parcels across those eight: 2,089.**
   - Lexington is excluded: the sentence stem survives verbatim but both numbers have been stripped. It is coded ABSENT, not present-with-zero.

5. **Give an existing-vs-new right-of-way split: 5 of 18.** Appalachia (13–14 mi existing / 13–14 mi new), Dickson (4.5 / 8.5), Gallatin (per-route, the most granular in the set), North Dayton (~8 / ~4), Tiny Town Road (100% existing, easement purchases N/A). West Tennessee is coded partial and excluded, per the note in §A.1.

6. **Give per-alternative mileage: 2 of 18.** Gallatin states Route 1 at about 7.1 miles and Route 2 at about 5.7 miles, each broken into existing and new right of way. Appalachia states switching-station tie lengths per site alternative — Site A 0.4 miles, Site B 1.2 miles. This count is strict: it excludes pages that give only a *range* across unnamed alternatives (109 North, Bristol, Hardin Valley, Lexington, Tullahoma, Waldens Creek, West Tennessee) and pages that break a single preferred route into segments (Dickson, North Dayton). Waldens Creek is the sharpest exclusion — it reports "3 alternative connection points and 31 alternative routes consisting of 18 alternative

segments" and gives a length for none of them. If the volume elsewhere adopts a looser rule that counts stated ranges as per-alternative disclosure, this figure will rise; the strict figure is 2 and the coding rule should be stated wherever it is used.

7. **Carry `meta-robots: noindex`: 18 of 18.** Uniform. All eighteen also set `canonical: https://tva.com/energy/transmission/transmission-projects` — the parent index page, not the project page itself. No page in the set is self-canonical. The count is of the directives present in the document head; `noindex` binds only crawlers that honour it and the canonical element is advisory, so this records what TVA instructed and not what any search engine did.

8. **Contain any megawatt figure: 0 of 18.** Neither "MW" nor "megawatt" appears on any page, in any context — not for load, not for capacity, not for generation. Confirmed page by page. Capacity is expressed only as kV, miles, feet of right-of-way width, acres, or qualitative phrases ("guaranteed capacity," "very high capacity," "near capacity," "firm capacity").

Two coding decisions behind these counts

Both were choices rather than facts:

- Counting **North Dayton as "names neither"** is what produces 16 rather than 15. A reader who treats any named corporation as "naming a customer" would get 15 neither and 2 named. The extraction is unambiguous that Nokian Tyres is land crossed, not load served, so 16 stands — but the sentence should be quoted whenever the figure is used.
- Counting **Tiny Town Road as a split and West Tennessee as not** is what produces 5. Swap either decision and the count moves to 4 or 6. Both judgments are defended in §A.1.

A.3 Stated purposes, verbatim

Purpose sentences are reproduced exactly as they appear, including TVA's own inconsistencies of wording and punctuation. Nothing is paraphrased or tidied. `[sic]` is used only where an error would otherwise confuse.

1. 109 North, Tennessee (Sumner County) — three versions on the page.

Update – August 2026: > As regional growth drives rising electric demand, TVA must build new transmission lines and generation assets to maintain system reliability for everyone we serve. TVA is currently planning to build a new high-voltage 161-kilovolt transmission line in the middle Tennessee region to serve the growing Gallatin/Sumner County area and improve local electric reliability.

Update – November 2024: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in Sumner County in Tennessee.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in Sumner County in Tennessee.

2. Appalachia Area Improvement, Tennessee and North Carolina

Background Update – June 2023: > TVA has identified the preferred location for transmission improvements that would meet growing demand and increase power reliability in the Appalachia area of Polk County in Tennessee and Cherokee County in North Carolina.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Appalachia area of Polk County in Tennessee and Cherokee County in North Carolina.

3. Bristol, Tennessee (South Bristol)

Background 2: > TVA has identified the preferred locations for transmission improvements that would provide power for growing load and increase power reliability in the Bristol, Tennessee area.

Background 1: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Bristol, Tennessee area.

4. Cates Landing, Tennessee (Lake County)

Update – November 2022: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in the Tiptonville area of Lake County in Tennessee.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Tiptonville area of Lake County in Tennessee.

5. Columbia, Tennessee (Fiberon) — one purpose block only; the page has no separate Background. This is the only page in the eighteen whose purpose sentence says "industrial."

Update July 2023: > TVA is considering improvements to its transmission system that would provide power for growing industrial load and increase power reliability in the Columbia area of Maury County in Tennessee.

6. Dickson, Tennessee

Update – September 2021: > TVA has identified the preferred locations for a switching station and transmission line that would provide power for growing load and increase power reliability in the Dickson, Tennessee area.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Dickson area of Dickson and Hickman Counties.

7. Fall Creek, Tennessee (Wilson and Rutherford Counties)

Update – September 2024: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in Wilson and Rutherford Counties in Tennessee.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Wilson and Rutherford County areas in Tennessee.

8. Gallatin, Tennessee (North Gallatin) — two purpose blocks plus a standalone lead sentence. The Background block contains no "TVA is considering…" sentence; it opens directly with the substation description.

Lead, under "Proposed Transmission Project" (note the non-standard "in order to"): > TVA is considering improvements to its transmission system in order to provide power for growing load and increase power reliability in the Gallatin area of Sumner County.

Update – April 2021: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in the Gallatin area of Sumner County.

Background — no purpose sentence; opens: > TVA would build the North Gallatin 161-kilovolt Substation about one-half mile east of the eastern end of Gateway Drive and about one-half mile south of Roundtree Drive.

9. Hardin Valley, Tennessee

Background 2: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in Knox and Loudon Counties in Tennessee.

Background 1: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in Knox and Loudon Counties in Tennessee.

10. Lewis Chapel, Tennessee (Dunlap)

Update – April 2022: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in the Dunlap area of Sequatchie County in Tennessee.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Dunlap area of Sequatchie County.

11. Lexington, Tennessee (West Lexington–Jacks Creek)

Update – March 2021: > TVA has identified the preferred location for a transmission line that would provide power for growing load and increase power reliability in Henderson and Chester Counties in Tennessee.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in Henderson and Chester Counties in Tennessee.

12. North Dayton, Tennessee — this page says "growing electrical load," not "growing load," and omits "power for."

Update — May 2019: > TVA has identified the preferred route for a transmission line that would provide for growing electrical load and increase power reliability in the Dayton area.

Background: > TVA is considering improvements to its transmission system that would provide for growing electrical load and increase power reliability in the Dayton area.

13. Riceville, Tennessee — one purpose block; the September 2023 update is schedule-only and states no purpose.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Riceville area of McMinn County in Tennessee.

14. Tiny Town Road, Tennessee (Clarksville) — one purpose block. Note the clause order is inverted relative to the standard formula: reliability first, load second.

Under "Proposed Transmission Project": > TVA is considering improvements to its transmission system that would increase power reliability and provide power for growing load in the Clarksville area in Montgomery County and in Christian County in Kentucky.

15. Tiptonville, Tennessee (Tiptonville–New Madrid No. 2) — one purpose block, and the only page in the eighteen whose stated purpose is import capacity rather than local load or reliability.

Under "Proposed Transmission Project": > TVA is considering improvements to its transmission system that would increase the transmission import capacity with Associated Electric Cooperative, Inc. (AECI), in the Tiptonville area in Lake County.

16. Tullahoma, Tennessee (Center Grove)

Update – June 2022: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in the Center Grove area of Franklin County in Tennessee.

Background (note "Franklin County Tennessee" — the "in" is missing, unlike the update): > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Center Grove area of Franklin County Tennessee.

17. Waldens Creek, Tennessee (Sevier County) — the update sentence ends without a terminal period on the page.

Update – July 2025: > TVA has identified the preferred location for transmission improvements that would provide power for growing load and increase power reliability in Sevier County, Tennessee

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Waldens Creek and Wears Valley area of Sevier County in Tennessee.

18. West Tennessee Power System Improvements (Fayette, Haywood, and Tipton Counties) — one purpose block; the September 2024 update is a hold notice, not a purpose statement, and is quoted here for completeness.

Background: > TVA is considering improvements to its transmission system that would provide power for growing load and increase power reliability in the Fayette, Haywood, and Tipton County areas in Tennessee.

Update – September 2024 (status, not purpose): > This project is on hold while TVA continues to evaluate power system improvement options. Once final decisions are made, we will notify property owners and members of the public regarding our plans to proceed.

A.4 Owner and parcel counts

Eight of the eighteen pages carry a countable owner/parcel sentence. The sentences are reproduced verbatim. Note that the phrasing is near-identical but the punctuation is not: most use a spaced en dash, Dickson uses an unspaced em dash, and Hardin Valley uses a comma. Hardin Valley and Lexington also say “routes” where the others say “segments,” and “the virtual open house” where the others say “a virtual open house.”

#	Project	Verbatim sentence	Owners	Parcels
2	Appalachia Area	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 345 property owners representing about 446 parcels.”	345	446
3	Bristol	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 346 property owners representing about 524 parcels.”	346	524
4	Cates Landing	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 37 property owners representing about 62 parcels.”	37	62
6	Dickson	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail— including about 237 property owners representing about 322 parcels.”	237	322

#	Project	Verbatim sentence	Owners	Parcels
8	Gallatin	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 165 property owners representing about 225 parcels.”	165	225
9	Hardin Valley	“Property owners near and along the alternative transmission line routes have been invited to the virtual open house by mail, including about 198 property owners representing about 325 parcels.”	198	325
10	Lewis Chapel	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 63 property owners representing about 82 parcels.”	63	82
16	Tullahoma	“Property owners near and along the alternative transmission line segments have been invited to a virtual open house by mail – including about 78 property owners representing about 103 parcels.”	78	103
	Total (8 projects)		**1,469**	**2,089**

The ninth case, Lexington. The page retains the sentence stem verbatim and has been stripped of both figures:

> Property owners near and along the alternative transmission line routes have been invited to the virtual open house by mail.

No owner count, no parcel count. This is coded ABSENT in $A.1 and excluded from the totals above, but it is a different kind of absence from the other nine: the sentence was

drafted to carry numbers and the numbers are gone. Eight of the remaining nine lack the sentence entirely.

The tenth, Fall Creek, replaces it with a denial: “no additional property owners will be affected.”

Every one of the eight figures is prefixed “about.” None is exact, and none is dated. The totals above should therefore be reported as approximate sums of approximations, and the parcel-to-owner ratio (2,089 / 1,469 ≈ 1.42) treated as indicative only.

A.5 Field-by-field detail, deposited as data

The field-by-field detail for all eighteen pages — route mileage, the existing-versus-new right-of-way split, right-of-way widths, the local power company, update stamps, the project schedule, the webmap identifier, the contact engineer, and the `canonical` and `meta-robots` values — is held as `appendixA_field_detail_v1_0.csv`, one row per project and one column per field, values verbatim from the pages as captured, 25,028 bytes, SHA-256 beginning `5e2f7308af46301d`.

A re-coder wants it as a table rather than as prose. The build script that produced it, `build_appendixA_fields_csv.py`, is held with it. **Neither file is in the deposit at 10.5281/zenodo.21959989, whose files were frozen at publication on 18 August 2026.** Both are listed at Appendix F §F.2 as cited and not deposited, and both go into the next version of the archive.

A.6 Notes and anomalies

Recorded so that a reviewer encounters them here first. Grouped by kind.

A.6.1 Boilerplate contamination on two pages, traced to a third

The Piedmont boilerplate is on **two pages that are not its own**, and the donor is **New Liberty, Alabama (Cherokee and Calhoun Counties)**, where Piedmont is in Calhoun County and the June 27, 2024 date matches New Liberty’s own schedule table. Appalachia carries New Liberty’s paragraph verbatim; West Tennessee carries a reworded version. The same project has contaminated a fourth document: TVA’s press release of 28 October 2024 announcing the Belmont Stage 2 open house in Clay, Lowndes and Oktibbeha Counties, Mississippi hyperlinks the words “virtual open house” to `tvavirtual.com/newliberty`, so a reader in Mississippi who followed TVA’s own link during the comment window reached another state’s project.

Appalachia and **West Tennessee** both carry a Public Involvement paragraph describing an open house held **June 27, 2024, in Piedmont, Alabama**. Piedmont is in Calhoun County, Alabama, and is unrelated to a Polk County TN / Cherokee County NC project and equally unrelated to a Fayette/Haywood/Tipton County project. On West Tennessee it also contradicts that page’s own schedule table, which records the open house as October 26, 2023. The same paragraph on two unrelated pages, both of which contradict their own

schedule tables, indicates a template or CMS fault rather than a one-off typo. On Appalachia it is verbatim; on West Tennessee it is reworded. **Any claim in the volume that rests on TVA's public-involvement record for either project must be qualified by this.**

A.6.2 Internal contradictions within a single page's own figures

- **Hardin Valley** gives **three different in-service dates**. The schedule table says "Winter 2045-2025" — an evident transposition, and not a date. The September 2024 update says the project is "expected to be in service in winter 2025-2026." Background 2 says "in service in spring 2024." All three appear on the page simultaneously.
- **Lexington** runs its schedule table two years ahead of its own narrative on **every row**. Table: surveys Spring 2021, easements Spring 2022, construction Fall 2022, in service Fall 2023. March 2021 update narrative: surveys Summer 2022, easements Spring 2023, construction Fall 2024, in service Fall 2025. Lexington also states a preferred route length (15.83 miles) that falls *below* its own stated range of "16 to 20 miles."
- **109 North** gives **three different route lengths**: 3.85 miles (Aug 2026), 3.34 miles (Nov 2024), and a range of 3.2–6.3 miles (Background). It also carries three different existing-vs-new formulations, one of which ("centered on new 100-foot-wide right of way," Background) is inconsistent with the August 2026 statement that structures go on existing 300-foot right of way.
- **Waldens Creek** retains superseded dates in its Background (construction fall 2026, in service winter 2026-2027) alongside a schedule table giving construction Spring 2027 and in service Winter 2028.

A.6.3 Structural gaps

- **Columbia (Fiberon) is the thinnest page in the set** and the gap is systematic, not incidental: no Map section, no ArcGIS embed, no webmap ID, no Project Schedule table, no Public Involvement section, no route mileage, no owner/parcel count. It carries a single inline completion date ("fall 2025") and nothing else. This is the one page in the eighteen that names an end-use customer — and it is also the page that discloses the least about the physical project. Chapter 5 §5.3 sets out what the coincidence does and does not establish.
- **West Tennessee is the only page with no right-of-way width at all**, substituting acreage figures for the switching-station site alternatives.
- **Tiny Town Road** and **Tiptonville** carry **no update stamp of any kind** — no "Update –" heading anywhere — so there is no way to date their content from the page itself.
- **Cates Landing**, **Lexington**, **North Dayton** and **Tiptonville** name **no local power company**.

A.6.4 Lapsed and stalled schedules

Against the 16 August 2026 retrieval date, a substantial share of the set carries schedules whose in-service dates have already passed with no update:

Project	Stated in service	Status at retrieval
Cates Landing	Spring 2024	lapsed, page not updated since Nov 2022
Gallatin	Winter 2023-2024	lapsed, page not updated since Apr 2021
Hardin Valley	“Winter 2045-2025” / winter 2025-2026 / spring 2024	lapsed and self-contradictory
Lewis Chapel	Spring 2024	lapsed, page not updated since Apr 2022
Lexington	Fall 2023 (table) / Fall 2025 (narrative)	both lapsed
North Dayton	spring 2023	lapsed, page not updated since Nov 2020
Tiny Town Road	Summer 2023	lapsed, no update stamp at all
Tiptonville	Winter 2024-2025	lapsed, no update stamp at all
Bristol	Winter 2025-2026 / Spring 2026	lapsed
Tullahoma	Winter 2025	lapsed

Ten of the eighteen advertise an in-service date already in the past as of the retrieval date. None of the ten carries a notice to that effect.

109 North is the opposite case and the more striking one. It is the most recently updated page in the set (August 2026) and it is the only page with **no forecast dates at all** — both “Construction is scheduled to begin” and “Project in service” read “To be determined.” A project whose schedule was firm enough to publish in 2024 has, as of the most recent update, had both milestones withdrawn. That page also introduces the forward-looking generation clause about towers sized for a future 500-kV line.

West Tennessee is formally on hold (“This project is on hold while TVA continues to evaluate power system improvement options”) while its schedule table still shows construction Spring 2027 and in service Fall 2028, unamended.

A.6.5 Text defects on the pages

Recorded so they are not reproduced silently:

- **North Dayton** Background opens “**VA** is proposing to build about 12 miles…” — the T is missing.

- **Appalachia**'s second schedule table is headed "**Martina** Creek Switching Station" — Martins Creek.
- **Bristol** has two schedule tables **both headed "Sullivan-South Bristol Transmission Line"**; the second is evidently the Bluff City–South Bristol line.
- **Hardin Valley** spells the distributor "**Lenior** City Utilities Board" in Background 2 and "Lenoir City Utilities Board" in Background 1.
- **109 North** uses both "Gallatin Department of Electricity" and "Gallatin Department of Electric."
- **Tullahoma**'s Background reads "Franklin County Tennessee" — the "in" present in the update sentence is missing.
- **Waldens Creek**'s July 2025 update sentence ends with no terminal period.
- **Riceville**'s Public Involvement section directs readers to "contact Austin Ethridge (see contact information below)" — no Ethridge contact block appears below; the page's only contact is Taylor Warden.

A.6.6 Formatting inconsistencies that matter for automated extraction

Anyone re-running this extraction with a regular expression should know that TVA's own markup is not uniform:

- Update stamps use an en dash on most pages, a **hyphen** on Dickson's February 2025 stamp, **em dashes** on both North Dayton stamps, and **no dash at all** on Columbia ("Update July 2023", bold).
- The owner/parcel sentence uses a spaced en dash on six pages, an **unspaced em dash** on Dickson, and a **comma** on Hardin Valley; Hardin Valley and Lexington say "routes" and "the virtual open house" where the others say "segments" and "a virtual open house."
- Dickson's schedule tables use "Construction begins" / "Section in service" / "Station in service" rather than the standard "Construction is scheduled to begin" / "Project in service."
- North Dayton uses lowercase season names throughout its schedule ("fall 2018," "winter 2021") where every other page capitalises them.
- **Tullahoma** is the only page whose Project Schedule carries no "Dates are subject to change" disclaimer.

A.6.7 Two findings that are uniform and should be reported as such

- **`meta-robots: noindex` on all 18, and `canonical` pointing to the parent index on all 18.** No project page is self-canonical. `noindex` instructs a compliant crawler not to index the page and the canonical element is advisory, so what the directives establish is what TVA asked for on every page, uniformly — not that the set is in fact absent from every search engine, which was not tested. This is a finding about the configuration, not an artefact of the fetch, and not a measured outcome.
- **Zero megawatt figures across all 18.** Not one page states a load, a capacity, or a generation quantity in MW. The most pointed instance is Tiptonville, whose entire stated purpose is to "increase the transmission import capacity" and which quantifies

that capacity nowhere. The second is Columbia, which quantifies the Fiberon facility in jobs (“over 300 new jobs”) and never in MW. Capacity language elsewhere is qualitative throughout — “guaranteed available (i.e., ‘firm’) capacity,” “very high capacity,” “near capacity.”

A.6.8 One retrieval caveat to disclose

Waldens Creek required two fetches. The first, using the unencoded URL with literal parentheses, returned a degraded plain-text rendering with the metadata header block and the ArcGIS embed stripped entirely — which would have produced false ABSENT codings on fields J and L. The second fetch, with URL-encoded parentheses, returned the full page. Coding above is from the second fetch. The lesson generalises: an ABSENT on a metadata or embed field should be confirmed with a second retrieval before it is published as a finding.

Appendix B — The Register and the Website

A crosswalk between what TVA publishes as a map service and what TVA publishes as a project page. Computed from `gis_archive_20260815/`, deposit 10.5281/zenodo.21959989, retrieved 2026-08-15T14:10:59Z.

B.1 What this appendix is for

TVA's website lists forty current transmission projects across five states. TVA's map services carry a hundred distinct `PROJECT_ID` values.

That is the whole finding, and Chapter 7 makes the argument about what it means. This appendix is the underlying table, so that a reader who wants to check the claim, or work on a project the website does not list, can find it.

A note on the unit. Converting those hundred identifiers into "one hundred projects" is not safe, and §B.2 is the reason: the register duplicates identifiers across layers, splits one project across two identifiers, and carries identifier formats that match nothing. North Gallatin alone holds two identifiers; `RailHub, MS Phase 1` appears twice on a trailing underscore. The honest unit is the key that was actually counted, so throughout this appendix the count is of **identifier groups** — one row per distinct `PROJECT_ID`, with every name that identifier carries listed beside it. A hundred identifier groups is a floor on the number of real projects in the register and is not equal to it.

Two further cautions before the table.

The register is not a list of secrets. Most of the entries the website does not carry are projects already built, whose pages were retired when they went into service. A falsification test puts the unpublished residue at about eighteen projects, and the test is described in Chapter 7. The register runs ahead of and behind the website, which is what a register does.

The register is not clean. It is a working engineering database that happens to be public, and it shows.

B.2 How TVA names the same project twice

Twenty-two of the hundred identifier groups carry more than one project name, because the alternatives layer and the centerline layer were populated by different people at different times.

Identifier	Name in one layer	Name in the other
409032	Red-Hills Leake, MS	Red Hills - Leake, MS
543225	Middle TN Generation & Transmission Capacity Expan	Middle Tennessee Generation & Transmission Capacity Expansion
631204	109 North, TN	109 North TN 161kV Delivery Point
549609	Fall Creek Falls	Fall Creek, TN 161kV Delivery Point · Fall Creek, TN Preferred Route
553928	Walden Creek	Waldens Creek
435684	North Dayton, TN	North Dayton-Goodfield 161kV
533773	Gladstone, AL	Harding Springs - Gladstone
431206	South Bristol	Sullivan - South Bristol
436014	Mineral Wells, MS	Mineral Wells-West Pleasant Hill 161kV

The identifiers themselves are no better. North Gallatin is 439098 in the alternatives layer and 533421 in the centerline layer — the same project, two identifiers. RailHub, MS Phase 1 carries a trailing underscore in one layer and not the other. Lewis Chapel is 536149 against 53649-2T0FP. Roane County carries a TPS prefix and no number that matches anything.

This is why Chapter 8 reports a floor rather than a census, and why this appendix counts identifier groups rather than projects. The mechanical join on identifier finds 46 identifier groups present in both layers. A researcher reconciling by hand will find a different number of real projects. Neither figure is wrong; they are answers to different questions, and only the mechanical one can be checked by someone else.

B.3 The register

One hundred identifier groups — one row per distinct PROJECT_ID — plus a group of records carrying no identifier at all. Sorted by the larger of the two mileages. All lengths are Vincenty geodesic; see Appendix C §C.4 for why that matters.

Status reads: *both* — the project has studied alternatives and a selected route. *studied only* — alternatives drawn, no route selected at capture, which usually means the routing is still open. *selected only* — a built or committed line whose alternatives are not in the layer.

Identifier	Name(s) in the register	Studied (mi)	Selected (mi)	Ratio	Segments	Status
409032	Red Hills - Leake, MS · Red-Hills Leake, MS	103.9	52.2	1.99	41	both
408262	West Batesville-North Oakland, MS	95.1	43.1	2.21	32	both
543225	Middle TN Generation & Transmission Capacity Expan · Middle Tennessee Generation & Transmission Capacity Expansion	88.8	33.3	2.66	57	both
548237	KY Area Improvements Phase 2 · Kentucky Area Improvement Phase 2	80.7	19.9	4.05	42	both
413622	Montpelier, MS	67.5	14.9	4.52	16	both
629986	Appalachia Area Improvement Project · Appalachia Area Improvements (AAI	64.8	26.0	2.49	42	both
631231	Belmont Stage 2 · Belmont Stage 2, MS	63.7	18.1	3.53	35	both
205817	Charity Lane, AL	55.6	—	—	48	studied only
490086	North Oakland - Coffeeville 161kV Proposed Transmission Project · North Oakland Coffeeville	54.8	17.2	3.19	31	both
529348	South Macon - DeKalb	52.7	—	—	29	studied only
400231	Selmer - West Adamsville · Selmer - West Adamsville, TN	51.8	15.0	3.45	21	both
TPS212623	Roane County, TN	51.2	—	—	38	studied only
409942	House, MS	50.3	9.6	5.23	16	both
417277	Moscow-Miller, TN, MS	47.3	17.1	2.77	21	both

Identifier	Name(s) in the register	Studied (mi)	Selected (mi)	Ratio	Segments	Status
422578	Oxford - Coffeeville, MS	44.4	28.6	1.55	21	both
400236	Union - Tupelo, MS	41.5	16.1	2.57	15	both
401412	Calhoun, GA	41.3	20.9	1.98	25	both
429389	West Lexington - Jacks Creek, TN	39.8	—	—	21	studied only
431206	South Bristol · Sullivan - South Bristol	37.0	14.3	2.59	40	both
631204	109 North TN 161kV Delivery Point · 109 North, TN	32.4	—	—	33	studied only
410521	Kenlake 161kV · Kenlake, KY	32.3	8.7	3.71	24	both
630471	Commerce Park 2	30.2	—	—	8	studied only
435725	Dickson Area Improvement · Dickson Improvement Area, TN	26.7	12.9	2.07	38	both
407525	Vesta Road, TN	25.9	—	—	19	studied only
425127	Artesia, MS	24.7	—	—	24	studied only
540428	New Transpark East, Ky	24.3	—	—	40	studied only
410316	Memphis Regional Megasite	23.7	6.5	3.67	29	both
541227	Mulberry, AL	22.9	—	—	18	studied only
102350	Volunteer-East Knox	22.1	—	—	21	studied only
551237	New Liberty, AL 115kV Delivery Point · New Liberty, Al 115kV Delivery Point	21.4	5.8	3.71	18	both
556369	Shooting Creek NC · Shooting Creek, NC	19.9	9.4	2.13	22	both
409282	Rickman, TN	19.7	4.7	4.22	16	both
528640	Midway- S. Macon	—	19.5	—	—	selected only

Identifier	Name(s) in the register	Studied (mi)	Selected (mi)	Ratio	Segments	Status
425126	Midway-South Macon, MS	19.4	—	—	7	studied only
409407	Rugby, TN	18.4	8.9	2.07	16	both
549609	Fall Creek Falls · Fall Creek, TN 161kV Delivery Point · Fall Creek, TN Preferred Route	17.9	3.0	5.96	22	both
414720	Ider, AL	17.7	4.5	3.94	9	both
413337	Deerbrook, MS	17.5	6.7	2.63	13	both
202139	Hillsboro, TN	16.9	—	—	18	studied only
553928	Walden Creek · Waldens Creek	16.8	3.0	5.57	33	both
418551	Guthrie, KY	16.0	3.9	4.09	21	both
431696	Eagle Creek KY, TN	15.8	—	—	6	studied only
542625	Sundown Drive, AL	15.7	—	—	15	studied only
441716	Hardin Valley TN · Hardin Valley, TN	15.6	5.4	2.87	19	both
400251	Cornersville, TN	15.2	—	—	12	studied only
406807	South Pittsburg, TN	15.2	—	—	15	studied only
541138	Helicon Trade, AL · Helicon-Trade, AL	11.7	14.8	0.79	13	both
417652	Bluefield, MS	14.7	6.9	2.12	8	both
410078	Spencer, TN	14.6	4.7	3.12	21	both
435684	North Dayton, TN · North Dayton-Goodfield 161kV	14.1	12.6	1.12	7	both
533772	Harding Spring-Gladstone, AL	—	13.8	—	—	selected only
536149	Lewis Chapel Delivery Point, TN	13.4	—	—	11	studied only
431218	Florence Iron City	—	13.3	—	—	selected only

Identifier	Name(s) in the register	Studied (mi)	Selected (mi)	Ratio	Segments	Status
438332	Shady Grove, TN	11.8	—	—	18	studied only
426571	Sandtown, MS	11.1	4.1	2.70	13	both
546255	Hickory Grove, KY	—	11.1	—	—	selected only
409365	Woodland Mills, TN	11.1	—	—	18	studied only
438921	Trade, AL	—	10.4	—	—	selected only
439098	North Gallatin	10.3	—	—	4	studied only
429122	Flowood, MS	10.2	4.6	2.20	13	both
545112	Paradise-Clarksville 161kV TL, Loop into St. Elmo	—	10.0	—	—	selected only
426568	Longino, MS	9.7	2.1	4.54	14	both
424931	Millington - Solar, TN	9.3	4.9	1.88	10	both
409409	Madisonville-Vonore, TN	8.4	—	—	1	studied only
430233	Center Grove	7.9	3.7	2.14	11	both
436713	Scenic Drive, GA Proposed Transmission Project	7.8	3.6	2.15	8	both
440238	Sweet Home (Arab), AL	7.7	—	—	1	studied only
533773	Gladstone, AL · Harding Springs - Gladstone	7.3	1.4	5.14	10	both
551220	Redstone Arsenal No. 3, AL	7.3	3.3	2.18	5	both
548403	Nettleton, MS 161kV-Delivery Point	—	7.2	—	—	selected only
436014	Mineral Wells, MS · Mineral Wells-West Pleasant Hill 161kV	7.2	5.0	1.43	11	both
409294	Mountain Home Road, AL	7.0	1.6	4.28	9	both

Identifier	Name(s) in the register	Studied (mi)	Selected (mi)	Ratio	Segments	Status
53649-2T0FP	Lewis Chapel 161k TL Delivery Point	—	6.8	—	—	selected only
529154	Tiptonville-New Mdrid No.2	—	6.7	—	—	selected only
539972	Cates Landing · Cates Landing, TN	6.5	3.8	1.71	9	both
429943	Blackjack, MS	6.0	2.5	2.46	4	both
435076	Horn Lake - Freeport, TN · Horn Lake-Freeport	6.0	2.8	2.12	11	both
533421	North Gallatin, TN	—	5.7	—	—	selected only
541224	Mulberry Mills 161 kV Delivery Poinit	—	5.7	—	—	selected only
436056	Gunstocker Creek 161kV Delivery Point	5.3	—	—	2	studied only
534626	Jones Chapel	5.3	—	—	1	studied only
441235	Fort Payne (Davis Gap) AL	4.9	—	—	3	studied only
407532	East Chickamauga, GA	4.2	—	—	7	studied only
443430	Alcoa-Nixon Rd	—	4.1	—	—	selected only
555816	Star Gap 161-kV Delivery Point	3.4	3.6	0.94	1	both
440387	Stateline Road, MS	3.5	—	—	1	studied only
409288	Lynnville, TN	3.2	—	—	1	studied only
539720	Claysville, AL	—	3.1	—	—	selected only
631350	Project CINCO Phase I, MS 161-kV ROW (Insert Loop Artesia-Severcorr MS 161-kV TL)	2.8	—	—	2	studied only
536980	Tiny Town Road, TN	—	2.0	—	—	selected only

Identifier	Name(s) in the register	Studied (mi)	Selected (mi)	Ratio	Segments	Status
530592	North Green Street, MS	2.0	—	—	11	studied only
431686	Artesia, MS	—	1.5	—	—	selected only
555085	RailHub South Phase 1	—	1.3	—	—	selected only
555085_	RailHub, MS Phase 1	1.3	—	—	1	studied only
541451	Riceville, TN	—	1.1	—	—	selected only
539168	Ultium - Night Sky	—	1.1	—	—	selected only
538746	West TN Power System Improvements	0.8	—	—	1	studied only
547560	Carbondale Park, Ga 115kV Del. Pt.	—	0.8	—	—	selected only
547555	Magnolia Solar	—	0.1	—	—	selected only
535582	Moore County Solar	—	0.1	—	—	selected only

A hundred and first group carries a null `PROJECT_ID` and is excluded, for the reason given in Appendix C §C.5: null keys collide and produce a spurious group.

B.4 What the table shows

Forty-six identifier groups have both studied alternatives and a selected route. These are what Chapter 8's ratio is computed over.

Thirty-three have alternatives and no selected route — 576.0 miles of studied corridor. But sixteen of the thirty-three carry a past `INSERVICE_DATE` and six more have a selected route filed under a second identifier; netting the one project that is both, twenty-one of the thirty-three are resolved and **twelve are genuinely unresolved, at 260.7 miles**. Chapter 8 §8.5 sets out both tests. The four largest are South Macon–DeKalb, Roane County in Tennessee, West Lexington–Jacks Creek, and 109 North in Sumner County. Charity Lane in Alabama is the largest studied-only group in the table above at 55.6 miles and is not unresolved: Chapter 8 §8.5 establishes it went into service on 3 November 2014, and Chapter 8 excludes it from the twelve for that reason.

The register records geometry, not notice. What an alternatives-only entry establishes is that TVA has drawn candidate corridors and has not published a selected route; it

establishes nothing about whether anyone along those corridors was written to, or when, or whether a page exists to tell them. Notice is a separate question, evidenced by the mailing sentence on the project pages where it appears — eight of the eighteen Tennessee pages, at Chapter 4 §4.3 — and by nothing in this layer. Several of the thirty-three have no public page at all, which is Chapter 7's point and cuts against the inference rather than for it.

Twenty-one have a selected route and no alternatives in the layer. Mostly older or built work.

Roughly forty projects appear on TVA's public index. The register holds a hundred identifier groups.

B.5 Two entries that acquired pages while this research was underway

Hickory Grove, Kentucky was on the list of register entries with no public page. A project web map tagged `TSSProjects` was created for it on **3 August 2026**, ten days before the capture.

Roane County, Tennessee had eleven items created across 24–25 June 2026 — an interactive map, an existing-system map, a land-use map, two comment forms with their backing services, and a project web map. A complete public-facing package stood up in about thirty-six hours.

Both are the reason Chapter 7 does not call the unpublished set a vault. It is a queue.

B.6 How to use this for research on a project the website does not list

The register gives a project name, an identifier, its studied and selected mileage, and its geometry. That is enough to do three things without asking TVA for anything.

Locate it. Query the alternatives layer filtered to the identifier and read the coordinates:

```
.../TSSProjects_Hosted/FeatureServer/5/query?
where=PROJECT_ID='543225'&outFields=*&f=geojson
```

Find the affected parcels. The county assessor's parcel layer, in nearly every Tennessee county, is itself a public ArcGIS service. Intersecting it with the corridor geometry gives the owner list that TVA's page would have given you if the page existed.

Identify the responsible engineer. Layer 0 carries a `SITING_ENGINEER` field, holding a TVA username. It tells you that a named person inside TVA owns the project, which is more than an unlisted project's absent page tells you. Address correspondence to TVA's records office rather than to an individual derived from the field: the values are hand-typed, they

are not published as contact information, and the volume's position on personal data in these layers is set out at Appendix D §D.4.

The companion guide covers what to request in writing, and from whom.

Appendix C — Reproducibility

Every computed figure in this volume, with the endpoint, the query, the rule and the code.

C.1 The standard this appendix is trying to meet

Someone who disagrees with a number in Chapter 8 should be able to find the disagreement.

That is a higher bar than "the code is available on request," which is the sentence the Virginia volume used and which is not a citation. It means the endpoint, the full query string including every parameter, the retrieval timestamp, the deduplication rule stated as a rule and as code, the join key, and the known soft spots stated as soft spots.

It also means stating the figures the obvious wrong method produces, and why each is wrong.

C.2 Retrieval

No authentication, no token, no credential, no records request. `capabilities` on `TSSProjects_Hosted` is `Query` and nothing else.

Service directory — the whole organisation enumerates in one request, because TVA uses no folders:

```
https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services?
f=json
```

302 public feature services. 764 public items of all types.

Layer metadata, all layers of a service at once:

```
https://services.arcgis.com/w8auYAijfGK1Mydj/arcgis/rest/services/
TSSProjects_Hosted/FeatureServer/layers?f=json
```

Feature records. The server caps a response at 2,000 records, so layer 5 requires two requests:

```
.../TSSProjects_Hosted/FeatureServer/5/query?
where=1=1&outFields=*&f=geojson&resultRecordCount=2000&resultOffset=0
.../TSSProjects_Hosted/FeatureServer/5/query?
where=1=1&outFields=*&f=geojson&resultRecordCount=2000&resultOffset=20
00
.../TSSProjects_Hosted/FeatureServer/0/query?
where=1=1&outFields=*&f=geojson
```

Counts without data. Where a count was needed from a layer holding personal information, `returnCountOnly` returns an integer and no records. This is how the `GeneSIS_Layers` county figures in Chapters 5, 10, 11 and 12 were obtained:

```
.../GeneSIS_Layers/FeatureServer/1/query?
where=CNTYNAME='SUMNER'&returnCountOnly=true&f=json
```

Note the field name. `COUNTY` and `STATE` are null throughout that layer; the populated fields are `CNTYNAME` and `STNAME`. A first query against `COUNTY` returned zero and was briefly believed.

Item metadata, which is where the customer names live:

```
https://www.arcgis.com/sharing/rest/search?
q=orgid:w8auYAijfGK1Mydj&num=100&f=json
https://www.arcgis.com/sharing/rest/content/items/<itemId>?f=json
```

All retrievals: **2026-08-15T14:10:59Z**, host clock. Page captures 16 August 2026.

C.3 Deduplication

TVA's alternatives layer returns 2,645 records containing 1,430 distinct segments. Segments recur with different `OBJECTID` and `GlobalID` values and byte-identical geometry.

The rule: two records are the same segment when their geometry coordinates, `SEGMENT` and `PROJECT_NAME` all match.

```
def dedupe(feats, extra=("SEGMENT", "PROJECT_NAME")):
    seen, out = set(), []
    for f in feats:
        k = (json.dumps(f["geometry"]["coordinates"]),) +
tuple(f["properties"].get(x) for x in extra)
        if k in seen:
            continue
        seen.add(k)
        out.append(f)
    return out
```

`PROJECT_NAME` is load-bearing. Sixteen segments are geometrically identical but belong to differently named projects; on geometry alone they merge wrongly and the count falls to 1,414. Layer 0 is deduplicated on geometry alone, which is correct there because it holds one selected route per project.

	Raw	Unique
Layer 5, alternatives	2,645	1,430
Layer 0, selected centerline	447	157

A sum over the undeduplicated layer 5 gives 3,725.0 miles against 1,998.5. **Any figure published from this dataset without deduplication overstates corridor by 86 percent.**

C.4 Length: the field that inflates it

Summing `Shape__Length` overstates every Chapter 8 mileage by about 22 percent.

`Shape__Length` is a field ArcGIS returns on every record. It is convenient, and it is a **planar** length in the service's Web Mercator projection (EPSG:3857), not a distance on the ground. Web Mercator inflates by approximately 1/cos(latitude).

The check is inside the data. Layer 0 carries TVA's own `MILES` attribute. Across the 125 deduplicated records where `MILES` is greater than zero:

Method	Median error against TVA's `MILES`
Vincenty geodesic on the WGS84 coordinates	**−0.0044%**
`Shape__Length` ÷ 1,609.344	**+22.48%**

Chapter 8 §8.2A states the same finding for a reader who will not reach this appendix. The numbers are identical; only the audience differs.

All published mileages are Vincenty geodesic, computed on the WGS84 coordinates the GeoJSON already contains. The full implementation is in `recompute_corridor_v2.py`; the shape of it:

```
def miles(geom):
    parts = [geom["coordinates"]] if geom["type"] == "LineString" else
geom["coordinates"]
    metres = sum(vincenty(p[i], p[i+1]) for p in parts for i in
range(len(p) - 1))
    return metres / 1609.344
```

The ratio in §8.4 is unaffected by this, because the distortion is common to both layers and divides out. That is why the planar ratio, 2.64, sits within a hundredth of the geodesic 2.63. The absolute totals differ a great deal:

	Planar (`Shape__Length`)	Geodesic (used here)
Alternatives studied	2,440.4 mi	**1,998.5 mi**
Centerline selected	790.1 mi	**648.0 mi**

C.5 The cross-layer join, the null-key collision, and the artifact it produced

A warning to anyone recomputing from these layers, stated before the method. `PROJECT_ID` is nullable in both published layers, and a join that does not exclude nulls will

collide every null-identifier record into a single phantom group. The collision is silent: it produces a plausible group with a plausible length and no error of any kind. It is the mechanism behind the spurious 640-mile figure at §C.6, and it will produce a different wrong number for anyone who repeats the join on different data. Exclude null identifiers before grouping.

The two layers cover different project sets, so the portfolio totals cannot be divided into each other. The ratio is computed only over projects present in both.

The rule: group both deduplicated layers by `PROJECT_ID`, **excluding null identifiers**, and keep projects with non-zero length on both sides. That gives 46 projects.

```
both = [p for p in alt_by_id if p in cen_by_id and cen_by_id[p] > 0
and alt_by_id[p] > 0]
```

The null exclusion is not cosmetic. Without it, every record missing an identifier falls into one bucket, and in this dataset that pairs `West TN Power System Improvements` — 64.4 miles of alternatives, null `PROJECT_ID` — against the `109 North TN 161kV Delivery Point` centerline record, 7.0 miles, also null. The resulting ratio belongs to neither project.

That is where a 7.08 ratio for 109 North comes from. 109 North has 32.4 miles of alternatives under `PROJECT_ID` 631204 and no centerline record carrying that identifier. The centerline record named `109 North TN 161kV Delivery Point` has a null identifier, which is why it fell into the collision bucket rather than joining to its own project. The highest genuine ratio in the matched set is Fall Creek at 5.96.

A second method, and why it is not the one published. A join on published page label first, then identifier, then normalised name, reconciled partly by hand, gives 52 projects at 2.62:1. The 52-group set is reproducible from the archive. Six projects are split across two identifiers — North Gallatin, Artesia, Midway–South Macon, Lewis Chapel, RailHub and Mulberry — and all six pairs are geometrically coincident, closest approach under 0.05 miles. Merging them is mechanical, uses only deposited files, and yields **exactly 52 groups**: 1,450.1 / 556.1 = **2.61:1**, median 2.58, range 0.79–16.47.

So both sets are checkable and they agree on the ratio to within two hundredths. The 46-group figure is published because it requires no merge rule at all; the 52 is recorded here because a reader who finds the splits will get it, and should find this paragraph waiting.

Published results, geodesic, 46 projects:

Alternatives studied	1,358.1 mi
Centerline selected	515.6 mi
Aggregate ratio	**2.63 : 1**
Median project ratio	2.61
Range	0.79 – 5.96

C.6 Known soft spots

Project identifiers are maintained by hand and disagree between layers. North Gallatin is 439098 in layer 5 and 533421 in layer 0. Artesia is 425127 and 431686. `RailHub, MS Phase 1` carries a trailing underscore in one layer. Roane County carries a `TPS` prefix. The mechanical join therefore misses real pairs, which is why 46 is a floor rather than a census.

Two projects have a ratio below 1.0 on the unmerged 46-group set: Helicon–Trade at 0.79 and Star Gap at 0.94. On the merged set Helicon–Trade becomes 0.46 and Harding Springs–Gladstone joins them at 0.48, and a fourth case, Midway–South Macon, at 0.995; neither of the first two lies inside the 52-group set, whose range is 0.79 to 16.47. Chapter 8 note 25 sets out the merges. A selected centerline longer than the alternatives studied for it is impossible in reality, so those projects have incomplete alternatives data. The aggregates absorb them; no single project ratio should be quoted without checking it.

Thirty-three identifier groups have alternatives and no selected centerline, totalling **576.0** studied miles. They carry no ratio. A figure of 640 is the sum of these plus the 64.4-mile null-identifier bucket, and is spurious. Sixteen of the thirty-three carry a past `INSERVICE_DATE` and six have a selected route under a second identifier, one project being both; twelve are genuinely unresolved.

`KV` is unreliable. Populated for 61 of 82 projects, and null on all eight North Gallatin records despite the project page stating 161 kV. Take voltage from the page, not the register.

Whether the duplicates are versioning artifacts is unresolved. `created_date` and `last_edited_date` are identical across every duplicate pair examined, which argues for an import run twice rather than for successive versions. If they are versions, the unique count is still right, but for a different reason than assumed.

These are studied and selected corridors, not acquired easements. Nothing here records what TVA bought. The right-of-way layer holds five features service-wide.

C.7 The code

Two scripts, both deposited.

`recompute_corridor_v2.py` — all Chapter 8 figures. Run it against the deposited GeoJSON and it reproduces every number in this appendix; it needs the Python standard library and nothing else. **It is in the deposit.**

`zenodo_deposit_tn_archive.py` — builds the deposit. Dry run by default; `--create` makes a draft and uploads. There is deliberately no `--publish` flag. The token is read from `ZENODO_TOKEN` and never written to disk.

`build_register.py` and `tva_tss_register_v0_1.csv` produce the 52-project crosswalk by the label-first method. They are not the basis of any published figure.

C.8 What this cost

An afternoon, and no cooperation from anyone. No records request, no proprietary dataset, no georeferencing, no site visit.

That is stated as a fact about method. The point is not that this was clever. It is that the quantity of land entering a federal corporation's siting process, and the quantity leaving it, has been publicly computable this whole time and was not computed.

Appendix D — The Archive, and Why It Exists

Concept DOI 10.5281/zenodo.21959988 · version 1.0 DOI 10.5281/zenodo.21959989. Captures 15–18 August 2026. Published 18 August 2026. Nineteen further captures were made on 24 August 2026 and one on 26 August; they are listed at §D.9 and §D.10, are not in version 1.0 and are to be added when the deposit next moves.

D.1 The problem this appendix answers

A reader who wants to check the Virginia volume can go to the State Corporation Commission and pull the case. The record exists independently of the applicant and of the author. It will be there in ten years.

There is no equivalent for anything in this volume.

TVA's transmission disclosures are web pages and web services under its sole control. No filing is made, no docket is opened, no third party holds a copy. The single most load-bearing artifact in the volume — a feature service named `Facebook_North_Gallatin_Alternative_Transmission_Line_Route` — could be renamed in under a minute by anyone at TVA with publishing rights, and there would be no record that it had ever carried that name.

Two further facts sharpen the problem.

Every TVA transmission project page examined carries `meta-robots: noindex`, which instructs a compliant crawler not to index it, with a canonical tag — advisory rather than binding — naming the parent index rather than the page itself. All eighteen Tennessee pages; not one self-canonical. The directive is what is established; whether any given search engine honoured it was not tested.

And on 16 August 2026 the Internet Archive declined a save request for tva.com:

> "We're currently facing some limitations when it comes to archiving this site."

The Archive holds captures of these pages through April 2025, so the limitation is recent. The robots directive has been offered as the explanation, and that connection is plausible and unverified. Chapter 4 §4.5 records a fact that weakens it: the same project content is served at a legacy path family carrying no directive. No `robots.txt` review was conducted.

The response was to stop relying on anyone else. Every dataset, service definition, layer schema and page quoted in this volume was retrieved and hashed. Fifty-eight files were placed in a Zenodo deposition; nineteen further captures made on 24 August 2026 are manifested at §D.9, one made on 26 August at §D.10, and none of the twenty is yet deposited. That deposition was published on 18 August 2026; §D.7 states the position,

including the difference between the concept DOI and the version DOI, and should be read before the manifest is relied on.

D.2 What is in the deposit

Zenodo deposition 21959989. Version 1.0 DOI 10.5281/zenodo.21959989; concept DOI 10.5281/zenodo.21959988. 58 files, 3,416,780 bytes. Published 18 August 2026, CC-BY-4.0. See §D.7.

The deposit holds forty files from the 15 to 17 August capture (thirty TVA files, seven Oncor/LCRA files, the manifest and two scripts) and eighteen Dominion Energy Virginia project page captures, the control set for the comparison at Chapter 14 §14.8. The manifest carries the Dominion captures under a dated addendum with their own method and sampling notes, because they are a different capture, of a different utility, on a different date, and a reader must not mistake them for part of the Tennessee census.

Turner, Tommy N. (2026). *Transmission Siting Disclosure Capture: TVA, Oncor/LCRA and Dominion Energy Virginia, August 2026* [Data set]. Version 1.0. Zenodo. https://doi.org/10.5281/zenodo.21959989. CC BY 4.0.

Tennessee Valley Authority, organisation `w8auYAijfGK1Mydj`, service `TSSProjects_Hosted` — route alternatives (layer 5, 2,645 records across two paged files), selected centerlines (layer 0, 447), right of way (layer 2, 5), substations (layer 3, 2), the service definition and the full layer metadata. Plus the complete 302-service organisation directory and ArcGIS Online item metadata and web map definitions.

Lower Colorado River Authority / Oncor, `Permian_CCN_External_Open_House` — route segment layers, study areas, service definition and layer metadata. Captured for comparison, and the comparison produced a clean structural negative: Burns & McDonnell's template has no customer field at all.

Twenty tva.com page captures — all eighteen Tennessee project pages, plus Belmont Stage 2 in Mississippi and the unlisted Middle Tennessee Generation and Transmission page — made 16 and 17 August 2026 after the Internet Archive declined, with a README describing how they were taken.

D.3 The full manifest

Every figure in this volume should be cited to a file and a hash rather than to a live endpoint. The endpoint may no longer return what is quoted here; the hash will tell you.

File (deposit name)	Bytes	Features	SHA-256
DOM_page_capture_aspen_golden_20260818.txt	11,443	-	2c06355bdfd9facec50d2114a12d792282cc5de436122923a5f7129200714b2c
DOM_page_capture_charlottesville_gordonsville_20260818.txt	11,891	-	2f3c4d721c2fc847ea8fd6d36ca34629b65f73824cc0c993127c5a215d50f679
DOM_page_capture_chesterfield_lanexa_20260818.txt	9,372	-	7a8ff967a63b828202c689f40471cbee213d826350730cfef59a4edd2bcf3db8
DOM_page_capture_cirrus_keyser_20260818.txt	6,812	-	b050f31d6ce948d6a8918a1e0d58c05b275ed239b5f2d2e452130f9c085a74c7
DOM_page_capture_culpeper_tech_zone_20260818.txt	8,410	-	c118d1b747b5f7fe2f92598b6eccc08bf57786c74463c0f8578758d217aae7ea
DOM_page_capture_dooms_harrisonburg_20260818.txt	11,761	-	244e9fef1e1251492c1e6860dd0f42ffda6abd3a5d5fdfcfff1a8b41a7dd9ff4
DOM_page_capture_gainesville_wheeler_20260818.txt	7,579	-	ffc4ff977b8477fa9ada3d83d8a5dab78a50a7d8bb956c73dff8cecb82c90c4a
DOM_page_capture_greenwich_20260818.txt	15,053	-	184d858b7fe946494444d974ddb9266a7fe4fdb8e06bb99e89b7d2ceaf0d8a73
DOM_page_capture_hornbaker_devlin_20260818.txt	8,542	-	163a0576b1d1a1ee20a5e89d1fa066cf72312500f2a305e513ed65dc3d97bb80
DOM_page_capture_loudoun_ox_20260818.txt	10,773	-	7691ca93a645c5f8e7af8303c7cd286f1d0fb069a36494d1431faa17d067ac9f
DOM_page_capture_morrisville_to_wishingstar_20260818.txt	15,081	-	9d248de3af297b0674347d6a79ca27213ff73d453226b3950bc140d6142e604b
DOM_page_capture_nebula_raines_20260818.txt	10,844	-	2d57d0f9b2bbeb3c3157786db2778d48922dde482e1afce4effa564f6476379d
DOM_page_capture_nimbus_20260818.txt	8,336	-	a1a4049f71d41dd37c49a7833b529b8ecf6596cba5911c1f076596faab03d07f

File (deposit name)	Bytes	Features	SHA-256
DOM_page_capture_north_anna_bristers_20260818.txt	15,917	-	d64eae9bb7e9041d678cc1680709f9198b54677f95b8590df0338116df8f8be4
DOM_page_capture_technology_blvd_electric_transmission_project_20260818.txt	8,497	-	96bad5f435e9911c9777c7f8b30925f637f88077829df5b822eec52f48b9cd93
DOM_page_capture_tributary_20260818.txt	12,852	-	4d6b35ff95e903634ea1f2dfe78f1fa945552ac2bf298e0e9fa351ab1efff9f0
DOM_page_capture_white_oak_20260818.txt	7,353	-	b5db67d3db0fadcba5a8f184dbf0ca3f9e899d587a7eb636b1e4cf2334402797
DOM_page_capture_wishingstar_mars_20260818.txt	5,870	-	4c879ec3c309378761e7dd21fd558e72d2bf1f20333fdb02bab8747760bf3012
MANIFEST.txt	27,647	—	5a64c74faaf57e8f0f782440386301cdc9450d00b8d440dec7bd61e1e011b505
ONCOR_LCRA_PermianCCN_L11_BHSL_prelim_segments_20260815.geojson	41,368	65	823271f9544d4240d7eb1ed65ddff27161dda1f568147443364a564cca40c62a
ONCOR_LCRA_PermianCCN_L12_BCBH_prelim_segments_20260815.geojson	63,406	82	f0784fb438e2c3539b5539544b4fde7e1d7ec9b0866fe111e819470b0a80a30e
ONCOR_LCRA_PermianCCN_L14_midlines_20260815.geojson	2,367	8	3e422fac3198607445f06226dfb381f375fb0aa1569b5b438d99ac5908e8ff3b
ONCOR_LCRA_PermianCCN_L34_BHSL_primary_route_20260815.geojson	74,560	122	a261f215ffe21d6c4b17fe61d8e1f8b1f8dd80423720d62f0b6ceb2a4db978b7
ONCOR_LCRA_PermianCCN_L7_study_areas_20260815.geojson	4,678	9	5359d2dac1e673b0738fe39337431455d1992ca5127b224415d62cc7c24bdeb9
ONCOR_LCRA_PermianCCN_all_layers_20260815.json	91,117	-	a9253388e3044d370789682b4e6b6fbc5d42bf8b2ccc146fbf59290a7f13e248
ONCOR_LCRA_PermianCCN_service_root_20260815.json	5,094	-	9c52ac0b114b572c7d833e77c3f26d1cfadd5c514712c7b4c07ea4943bb1d6d7
TVA_AGOL_items_20260815.json	102,853	-	7e9e6891adf17c14bc913cf2129dcada70eaf9c46ad999ab7a2de5eacfbfbbe4

File (deposit name)	Bytes	Features	SHA-256
TVA_TSSProjects_L0_centerline_20260815.geojson	432,027	447	2898370e8f998270834517dab9927ede84ad0bee7f8a3b89f89c83ca1af6fd0a
TVA_TSSProjects_L2_row_20260815.geojson	37,141	5	0200c221378410d878e0574ec8db59e383f8cea491e6a67712dede0d883fefef
TVA_TSSProjects_L3_substation_20260815.geojson	1,648	2	0b4045deec13e2461f585d14b8e1ff60b4fe258573ef93c00c850c5088d6b114
TVA_TSSProjects_L5_alternatives_p1_20260815.geojson	1,473,375	2000	d9680cf1121d1a29ef058645d566b67e7adec8e08042dea4b6b3a98f0a6c59d4
TVA_TSSProjects_L5_alternatives_p2_20260815.geojson	467,927	645	51837a7828255e6da505ecfa073285da940664602c0a3f21c3f8c2912d1b1393
TVA_TSSProjects_all_layers_20260815.json	47,179	-	5afcb16c2707beea652577f9b2c18d25a752f28de924fd3e6e08233aaef317d8
TVA_TSSProjects_service_root_20260815.json	3,699	-	f7c2831282ed08f4d2ed810c1e921418278461c40dae7f66962aebb698c22d51
TVA_org_and_NorthGallatin_20260815.json	152,670	-	64249836d33ebfbfc24404d4cb3374f851f28656a12669fa96e39a9056428f39
TVA_page_capture_109_north_sumner_county_20260816.txt	8,915	-	f8df31eba0826eaed612f6a1dd8fa9495b4f129e977b588776e2ecdf3d1b1869
TVA_page_capture_appalachia_area_improvement_20260817.txt	13,392	-	62e270d610f28bcee9a2e8e6e2b251838bfbea3131e1b10abaaa1c415934c9b7
TVA_page_capture_belmont_stage_2_mississippi_20260816.txt	6,949	-	1fe9a4e86f1f3dcefe78d75599eaa84766f553d62eb6bbd72d769c823c3683b3
TVA_page_capture_bristol_south_bristol_20260817.txt	12,233	-	513cde50552d01b6627a5e2cfbbde2b7d4162408ad5602595e7a216da27757ed
TVA_page_capture_cates_landing_20260817.txt	7,446	-	ed84d62110539538f11bd8d52a39cb51c01a266896047de3a345f7e59b22b8bd
TVA_page_capture_columbia_fiberon_20260816.txt	3,966	-	b8379453297bd5e428be8007ffe0a884446b98c85ff029b06f99f97570370dfa

File (deposit name)	Bytes	Features	SHA-256
TVA_page_capture_dickson_20260817.txt	12,279	-	8c4e681b677978b45702ad233345406da0a94c6286660687961a07edc60b7010
TVA_page_capture_fall_creek_20260817.txt	8,166	-	4c303076a6d70c0edfeb25edeeaf8c0a18b3d851db216c75f600ab29ae84174d
TVA_page_capture_hardin_valley_20260817.txt	10,534	-	59825b1cabfaeb972a8952ada1a7d8c935dc97c8fc08bfb036f2a216658def89
TVA_page_capture_lewis_chapel_dunlap_20260817.txt	8,311	-	81410b13b87cb3f995ecc236969890078e9c57b686a7960f0ac71f06fb762845
TVA_page_capture_lexington_west_lexington_jacks_creek_20260817.txt	8,459	-	b69fac049824ceb8d4abfbec207fe9143520d080ffb66429d778598f9ac40df7
TVA_page_capture_middle_tennessee_gt_20260816.txt	10,502	-	243d9fbd9a86824a50f57fe49be94bc1ccbdcd2d1c43f23af684dec9686af714
TVA_page_capture_north_dayton_20260817.txt	10,247	-	0e29c6aeed443ec505292140029 54f996d5f64df58d866737eff1151d53d6876
TVA_page_capture_north_gallatin_20260816.txt	7,094	-	24dd27ae68c8014eb120eb7829a252cbaef531ce7865855d54b1869002d7b942
TVA_page_capture_riceville_20260817.txt	8,586	-	66d2ecad69e613921fbe879cb20e8d14800a60c4b9c1214abe31005a4cca75cb
TVA_page_capture_tiny_town_road_clarksville_20260817.txt	8,711	-	8515aef7575bfa27282ec1252040e1c5425fdef831da69dbf417e60f2fc7944d
TVA_page_capture_tiptonville_new_madrid_no2_20260817.txt	8,786	-	1f223b89394ac418ae9c34456e8784cb58595242d2b68cc3cc14fed1bcbf7f8b
TVA_page_capture_tullahoma_center_grove_20260817.txt	8,225	-	ff9cc4f1a748a1a5710a1155bb7cd83aea1090f16912bf73d81e7c72df0a823d
TVA_page_capture_waldens_creek_20260817.txt	10,385	-	350f715a48a19cb00641a9908e18e1ee561ecd365d9b552ce3d57e21b7f51b9f
TVA_page_capture_west_tennessee_power_system_improvements_20260817.txt	11,157	-	25d78388ef24626a5bb794d456a4e0a8454c77cc17f7bf34bf5a190c58d24a00

File (deposit name)	Bytes	Features	SHA-256
TVA_page_captures_README_20260816.md	2,692	-	315b32e1fc62bd1ab08442371ea347139a1e0dbd84c67ab41ca85b42e6e3cba0
recompute_corridor_v2.py	6,492	-	2f4df4c9655b4047eb0ae7a419ac6f44d6c508e3ce04628df389133d39f1b5e8
zenodo_deposit_tn_archive.py	8,111	-	08989c30fb8584d6d9a085ad082e86882deb630ab080558d7d75c72340537730

`MANIFEST.txt` inside the deposit carries the same table plus the full source URL and query string for every file.

A note on the filenames. Zenodo stores files flat and does not preserve directory structure. In the working archive the twenty page captures and their README sit in a `page_captures_20260816/` folder; in the deposit they are the twenty-one `TVA_page_capture*` files above, dated by capture day rather than by folder. Citations throughout this volume give the **deposit** filename, because that is what a reader downloads. The manifest records both names. Fifteen citations of GIS files prefix the deposit filename with the working directory `gis_archive_20260815/`; the filename after the slash is the deposit's own and resolves, and the prefix is retained because it identifies which capture session produced the file.

D.4 What was deliberately not captured

Two categories of record were reachable and were left alone. Their layer metadata is deposited so that their existence is documented without reproducing the data.

TVA `GeneSIS_Layers`, layer 1 — 151,858 Tennessee tax parcels intersecting TVA's generation siting areas of interest across fourteen counties. Every record carries `OWNNAME`, `MAILADD`, `SITEADD`, acreage and study phase. The county counts used in Chapters 5, 10, 11 and 12 were obtained by `returnCountOnly` queries, which return an integer and no personal data. The parcel records themselves are not in the deposit.

LCRA / Oncor parcel and "Habitable Structures" layers, which map individual homes and named private landowners in Texas.

Both are anonymously queryable at source by anyone who wants them. That is the point of naming them here. Neither is republished.

D.5 Capture times and filenames

The authoritative capture time is the `retrieved_utc` value inside each bundle and the host clock reading **2026-08-15T14:10:59Z**. The files carry `20260815` in their names; a sandbox clock running two days behind wrote them first with `20260813`, and only the names were changed. The hashes above are of the bytes as captured.

Seven files sit in the manifest's addendum rather than its main table: five page captures and their README, made after the manifest was compiled, and `TVA_AGOL_items_20260815.json`, the file Chapter 6 §6.6.1 rests on.

D.6 Which pages are deposited, and which are not

All eighteen Tennessee project pages are in the deposit, hashed at §D.3. Three were captured on 16 August 2026, along with two pages outside the census — Belmont Stage 2 and Middle Tennessee Generation and Transmission, neither of which belongs to the Tennessee eighteen — and the remaining fifteen on 17 August.

Nineteen further sources quoted in this volume are captured, hashed and manifested at §D.9 and are not in the deposit. Until it moves, citations to those nineteen resolve to live URLs on servers the subjects control. One further capture, made on 26 August 2026, is at §D.10.

D.7 Publication status

The deposit was published on 18 August 2026. The script that created it, `zenodo_deposit_tn_archive.py`, has no `--publish` flag, deliberately; publication was a manual act by a human after review.

Two DOIs, and they are not interchangeable. Zenodo minted a concept DOI, **10.5281/zenodo.21959988**, which always resolves to the most recent version, and a version DOI, **10.5281/zenodo.21959989**, which resolves permanently to version 1.0 — 58 files, 3,416,780 bytes, as published on 18 August 2026. A reader checking a figure in this volume against the evidence should use the **version** DOI, because a later version will contain different files. A reader who wants the current state of the archive should use the concept DOI.

Citations throughout this volume point to the version DOI and resolve now.

The archive record carries `isSupplementTo` relations to this volume's concept DOI, **10.5281/zenodo.21996375**, and to the Virginia volume's concept DOI, 10.5281/zenodo.21895588.

A version 2 of the deposit should be expected rather than avoided. A second investor-owned utility is the highest-value outstanding capture, and adding it means new files,

which means a new version DOI under the same concept DOI. That is how Zenodo versioning is meant to work and it is not a defect in version 1.

D.7A Why this volume points at its evidence

10.5281/zenodo.21959989 resolves to fixed bytes, enumerated in §D.3 with a SHA-256 for each, held by a third party, and unchangeable — Zenodo freezes a published record's files, and a later capture becomes a new version under a new DOI rather than a silent replacement. The pointer does not resolve to a moving target, and if the bytes ever fail to match the hash in §D.3 the reader has found something worth reporting rather than a figure to re-check.

D.8 How to check a figure against this deposit

1. Download the file named in the endnote.
2. Compute its SHA-256 and compare against the table above.
3. Run the relevant function in Appendix C.

If the hash matches, the bytes are the ones the figure was computed from, whatever the live endpoint returns today. If it does not match, you have found something more interesting than a figure.

D.9 Addendum, 24 August 2026: nineteen captures not yet deposited

Version 1.0 of the deposit closed on 18 August 2026. Nineteen sources cited in this volume were captured on 24 August and are held, hashed and manifested in `captures_20260824/`. They are not in the deposit, and until it moves, citations to them resolve to live URLs on servers the subjects control. Nine were acquired during research on 23 and 24 August. Ten are sources the volume quotes verbatim and grades primary.

File	Bytes	SHA-256
CheathamCounty_zoning_resolution_20260824.txt	131,991	780c2918465a1bb5c065d8baf9321227f48ad7c05c245e3ae43ae7a5d32b5c45
CommercialDispatch_belmont_stage2_20250530_20260824.txt	12,536	8c4bbebd7ee49919d15a58c718af5d48dbe31720fada8d06415255347e0a9b2d
TVA_CE_checklist_list_FY2020_20260824.txt	90,772	08c3cff1f006835baed4c29c225a965d0b505625ad6bfe9c008f263d531ddc74
TVA_CE_checklist_list_FY2021_20260824.txt	92,185	6818c17b98789d9cd3b3550242eefdba83d9fcdd7aef4108cefe67460ac86679
TVA_CE_checklist_list_FY2022_20260824.txt	90,054	a9487219a4e9583a270759c8a690d5474c954553d3a50130bc7b2a973333a8c4
TVA_CE_checklist_list_FY2023_20260824.txt	91,478	9fc6bd01b3fdf303111bff3b13165c43bbcb030c53649eab500b710b310a8eef
TVA_CE_checklist_list_FY2024_20260824.txt	88,329	7ec80bc8303d47787b6424899c2aaecd516e9889894bbb8a2bac3a3a7b2b3fe1
TVA_CE_checklist_list_FY2025_20260824.txt	85,741	ff64b34ae5404df6c845461fe96ca00ca73a7cee0315457c9a5ca000e7209da4
TVA_CE_checklist_list_FY2026Q1_20260824.txt	57,526	92c5f99bb736e0d9bfeed8b75df02bbc4f131745d7282bbb43ae4959887ef4b5
TVA_CE_checklist_list_FY2026Q2_20260824.txt	70,581	084d806fa87c51e4cd201750b991a2e66ed930409af057d75f8cb73f33c92615
TVA_appalachia_affected_parcels_layer_def_20260824.txt	23,310	b0e96dff0122ef9248548f406776cf17cfa7ce14e60afd11321b17e55b95af38
TVA_bristol_final_EA_20260824.txt	128,271	e6802e91828e0487c2138bd15b2e527a16cc5e2dca1fd63f1d739b5c5b11c091
TVA_cheatham_generation_project_page_20260824.txt	15,096	a2cc3f09f8051ed037a372ac42311b939f9eaea12bd0816f8a68cc357cc42164
TVA_cheatham_scoping_report_20231102_20260824.txt	118,133	0929744e556d1bc7d1297b2ff73a4e54b28a213cd4b78223fda39ef4dda114a3
TVA_middle_tennessee_transmission_page_20260824.txt	16,451	4364a24daf59817218e6b9c3972f2904ec62d3f31efabf4a50f1eb12d5f8b2e5
TVA_north_dayton_final_EA_20260824.txt	130,548	aeab94be287f5b6dd2a386177840e3b728f84df323cf0ea8885f8991613fa174
TVA_press_release_belmont_stage2_open_house_20260824.txt	10,714	f46c08823abc24677dfbe0329b5803a920a60f8781e642eeb7bc3b03604bcde4
TVA_shooting_creek_project_page_20260824.txt	22,950	18c62a7edcfea27b1b68ba6ab6d2e6e4363b7968498476fd1fcc85b7cca88ba4
TVA_survey123_open_house_splash_roane_20260824.txt	11,796	317cc24ab61124f4d6f7b27fc12ef4c3c534d17cf3c878565829e9749f5d6266

Nineteen files, 1,288,462 bytes. Every hash and byte count was recomputed from disk after the manifest was written.

What these captures verify, and what they do not

The categorical exclusion register is the load-bearing set and these captures verify only part of it. Eight documents were retrieved. **None of the eight states a record total anywhere**, so the figure of 11,899 determinations cannot be read off them; it is a sum of rows, derived as Chapter 3 note 5 describes and independently re-derived there. Six of the eight captures truncate before their final row, so **4,747 complete rows of the 11,899 are captured, which is 39.9 per cent**. Two captures, FY2026 Q1 and Q2, appear complete and return exactly the published counts of 399 and 494. Completeness is inferred from the row count matching, so those two are consistent with the published figures rather than independently confirmed; no capture carries a statement from TVA that a list is complete. The counts by exclusion type are likewise not tabulated in any of the eight and must be derived; the captured rows return between 34 and 44 per cent of each asserted total, which tracks the row coverage and is consistent with the figures without confirming them.

What that means for a reader. The 11,899 and the per-exclusion counts remain what Chapter 3 note 5 says they are: figures derived from complete documents read in a browser and re-derived by a second researcher. These captures fix the documents at a date and a hash, and two periods return counts consistent with the published figures. They do not let a reader recompute the total, and no claim here suggests otherwise. Recomputing it needs the eight PDFs in full, which the retrieval tool available here will not deliver.

CEC 54402 is captured verbatim, in the FY2026 Q2 list: `54402 Columbia-Mt. Pleasant 46-kV Transmission Line (L2522) Reroute for Columbia Industrial Development Board (IDB) Maury TN Electric System Projects 1/5/2026 16`. That is the row Chapter 3 note 14 grades a probable and unestablished identification for the Fiberon project. CEC 54972, 47184 and 48399 fall in truncated ranges and are not in these captures.

Both environmental assessments confirm the sentences the volume quotes from them. Bristol, §1.5: “Each property owner affected by the preferred transmission line routes was mailed a letter explaining the project,” followed by “346 property owners who could potentially be affected” and “A total of 111 property owners submitted comments.” North Dayton, §1.5: “TVA announced the preferred route to the public in Winter 2018. Letters were sent to affected property owners, elected officials, and information was provided to the public through TVA’s website,” closing an account of the 20 September 2018 open house at which 116 owners were invited, 62 attended and 10 commented. **Neither correspondence appendix was reached** — Bristol’s Appendix A begins at page 107 and North Dayton’s at page 105, both beyond the truncation. Whether either appends a notification letter is not established either way.

What the Bristol capture does not establish. The captured Bristol assessment contains no signature block and no occurrence of the name Booker in the characters retrieved, and its cover reads only “April 2024.” The capture is truncated at page 35 of a document whose Appendix A begins at page 107, so it cannot distinguish a finding that sits beyond the cut

from a finding published separately. Either way the signature is not established by this capture, and Chapter 3 note 7 cites it to the finding rather than to the assessment.

TVA's FY2021 list is live on tva.com at `/docs/default-source/1-float/`, a different path from the other seven.

Truncations

Ten of the nineteen captures truncate: six of the eight categorical exclusion lists, both environmental assessments, and both Cheatham documents. Each capture file records where its own retrieval stopped. Three bear on live claims and are stated here.

The Cheatham County zoning resolution was retrieved to 128,730 characters and stops at printed page 57. **Appendix A, Table I was not reached**; the document's own table of contents places it at page 188. That table would establish which zoning districts admit an extensive impact facility, so this capture proves the definition was adopted and not where a data centre may be built. Chapter 12 note 38 states that limit and this capture does not close it.

The Cheatham scoping report was retrieved to 115,519 characters and stops inside Appendix A; Appendices B and C, the public scoping comments, were not reached. The 35-to-45-mile figure the volume relies on sits upstream of the cut.

Both environmental assessments stop before their correspondence appendices, Bristol's at page 107 and North Dayton's at page 105, so whether either appends a notification letter is not established either way.

One thing about the parcels capture

The layer definition does not itself name TVA. `SOURCEAGEN` is a schema field with no value in the capture, and `description` and `copyrightText` are blank. Attribution rests on the service being published under ArcGIS Online organisation `w8auYAijfGK1Mydj`, which this volume establishes elsewhere as TVA's, and on the layer's title. The filename asserts more than the file alone supports, and this records it.

Retrieval caveats that bear on reuse

Six of the CDN URLs were rejected by the retrieval tool for length with their `?sfvrsn=` cache-buster attached and succeeded with it stripped. Those files carry the full assigned URL on the `SOURCE:` line, and each discloses in its capture notes that the string actually fetched was the query-less form. Several bodies retain the tool's own four-line response header, identified as tool output in each file. Records in the register wrap across two to seven physical lines, so any row parser must join lines before counting.

The fetch tool's truncation point varies. Observed cuts in this set fall between roughly 79,000 and 129,000 characters. It is a limit that varies, not a fixed ceiling, and any negative drawn from a long document must state where its own retrieval stopped.

Personal data

No property owner's mailing address appears in any capture file. The Appalachia parcels capture is a layer definition and nothing else: no feature query was run, no `outFields` request was made, and no attribute value was retrieved. `OWNNAME`, `MAILADD`, `MCITY`, `MSTATE` and `MZIP` appear as schema entries and as null template prototypes. The finding this volume draws from that layer is that TVA publishes such a schema on an unauthenticated endpoint and records no field for notification. Reproducing a row would turn a finding about disclosure into a republication of personal data.

The only postal addresses in the nineteen files are institutional: TVA's Chattanooga and Knoxville offices, TVA substation and facility locations, and one agency contact.

Six personal names appear in the categorical exclusion captures on Section 26a shoreline permit rows, in project-title fields TVA itself published, where the other 3,706 of the 3,712 such entries carry only an internal identifier. The rule counted is a personal name identifying an apparent permittee; it excludes entity names, farm names, a professional engineer named with his qualification, and a TVA delivery-point designation that reads as a personal name. Under a looser rule the count is higher, which is why the rule is stated. A name and a county is all that is exposed; no address, telephone number or other contact data accompanies any of them. Nothing was redacted, because these captures are verbatim records of documents TVA published, and altering them would defeat the purpose of capturing them. This volume quotes none of those rows.

D.10 Addendum, 26 August 2026: one further capture

One source was captured after the §D.9 addendum closed. Chapter 6 note 5 gives TVA's ArcGIS Online organisation as holding 764 public items. The full paginated search was captured on 26 August 2026.

File	Bytes	SHA-256
`captures_20260826/TVA_AGOL_item_search_full_20260826.json`	1,417,843	`53a523fe2cfe720e2834a34e86b0335b885b5cc77fe5a8ce0c00f131b663e4bb`

The capture holds all 764 items across eight requests at a page size of 100, and the count it returns equals the count the endpoint reports. It is not in the deposit, whose files closed on 18 August 2026, and it stands in the same position as the nineteen captures at §D.9: held, hashed and manifested here, and citable against a live endpoint until the deposit moves.

Appendix E — The Generation Siting Layer: Method, Field Traps, and What Was Deliberately Not Captured

The county figures on which Chapters 10, 11 and 12 rely are stated in those chapters, with their own endnotes; this appendix documents the dataset they come from and the decisions taken in handling it.

E.1 The dataset

TVA publishes a feature service named `GeneSIS_Layers`. Its own description states what it is:[1]

> "This feature service contains Generation Siting Public classed GIS data for use with the Generation Siting project only. Layers as of 202507301441: - Industrial, Manufacturing, County Tax Parcels selection of Tennessee Parcels where"OWNTYPE LIKE '%ind%' Or OWNTYPE LIKE '%manu%' Or OWNTYPE LIKE '%county%'". - Select AOI Intersected Tax Parcels."

Two layers. The second is the one that matters: **AOI Intersected Tax Parcels — the tax parcels intersecting TVA's generation siting areas of interest.** It contains **151,858 parcels**.[2] Access is anonymous and unauthenticated, and the service is query-only.[3] The snapshot is dated by TVA to 30 July 2025.

Every parcel lies in one of fourteen Tennessee counties, all in Middle Tennessee:[4]

Cheatham · Davidson · Dickson · Giles · Lawrence · Lewis · Maury · Montgomery · Robertson · Rutherford · Sumner · Trousdale · Williamson · Wilson

Per-county counts for the three this volume has reason to examine are at Chapter 10 note 15 (Sumner, 15,441), Chapter 11 note 22 (Maury, 21,989, the largest of the fourteen) and Chapter 12 note 40 (Cheatham, 10,601).

The overlap between these counties and the transmission projects examined in Chapters 10 through 11 is not evidence that the two programmes are one programme. Both concentrate in Middle Tennessee because that is where the load growth is. What the overlap establishes is that TVA was evaluating generation sites in the same counties, in the same period, as the transmission work described in those chapters.[5]

E.2 Every record is at the same study phase

`STUDYPHASE` has exactly one non-null value across the entire layer: **"Initial Feasibility Processing."**[6] Nothing has advanced past it, or nothing that advanced was removed. The

AREA_DESC field, which would carry a description of each area of interest, is null throughout.[7]

This is a screening dataset. It is not a shortlist, it names no project, and it names no facility, capacity, technology or date. Chapter 10 records that TVA's 109 North page justifies lattice towers sized for a future 500-kV circuit "as electric generation is added in the area," and that no filed document identifies that generation.[8] **This dataset does not fill that gap and is not offered as filling it.** The two facts sit alongside each other, and this volume does not claim the areas of interest are the generation the 109 North page means.[9]

E.3 Two field traps, recorded because they invite the error

SITEALIAS is not a site name. Its field alias reads "Site Name," which suggests a list of named candidate sites. It holds a parcel identifier of the form `County-parcelnumber`, with 115,573 distinct values across 151,858 parcels — very nearly one per parcel.[10] There is no list of named generation sites in this layer. The site-level key is SITEID, and the descriptive fields around it are empty.

COUNTY and STATE are null throughout. The populated fields are CNTYNAME and STNAME. A query filtering on COUNTY returns zero for every county, which is a false negative rather than an absence of parcels.[11]

Anyone recomputing from this layer will hit both.

E.4 What is in the records, and why none of it is reproduced

Each of the 151,858 records carries, among other fields:[12]

OWNNAME (Full Owner Name) · MAILADD (Full Mailing Address) · MCITY · MSTATE · MZIP · SITEADD (Full Site Address) · GISACRE · PARCELOWNN (Number of Owners)

That is a publicly queryable list of names and mailing addresses for the owners of every parcel TVA is screening for possible generation siting in fourteen Tennessee counties. The data is lawfully public — Tennessee parcel records are public records, and TVA has aggregated and republished them for a stated programme purpose. Nothing here suggests otherwise.

This volume reproduces none of it. The deposited archive captures the layer's metadata — field list, record count, study phase, county coverage — and not its feature records.[13] County-level counts are cited; individual parcels are not. The metadata documents that the field exists and what it contains, which is the evidentiary point, without redistributing 151,858 people's names and addresses in a research dataset.

That decision is recorded here, because a reader checking the deposit will find the omission and should know it was deliberate.

A reproducibility limit follows from it, and is stated. Because the feature records were not captured, the county counts in Chapters 10, 11 and 12 are **not recomputable from the archived files** and would have to be re-queried against the live service. That is the cost of the privacy decision and it is accepted knowingly. It is the only figure in this volume with that property.

E.5 The unit

These 151,858 are parcels, not people. One owner can hold many parcels, and this volume has not counted unique owners — doing so would require pulling the owner-name values themselves, which is precisely what §E.4 declines to do. The number of distinct human beings named in that layer is unknown and is certainly smaller than 151,858.

What is established is that every one of the 151,858 records carries a name and a mailing address. That is the evidentiary point and it does not depend on the count of people.

E.6 The asymmetry, stated at the size the evidence now supports

TVA's transmission project pages do not name customers. TVA's generation siting dataset carries 151,858 parcel records with owner-name fields populated. Read together, the two describe an institution whose published record is detailed about the people in the way of infrastructure and comparatively silent about the people it is being built for.

This does not generalise to utilities at large. Oncor's Texas siting data, captured for comparison and described at Appendix D, includes a `Habitable Structures` layer with one point per home along each proposed route, and parcel notes recording which owners the county appraisal district had flagged as confidential.[14] Two utilities publishing the burden side in detail is not a rule about utilities.

The eighteen-page Dominion Energy Virginia comparison run on 18 August 2026 cuts directly against it.[15] Dominion discloses **less** of the burden side than TVA on every field measured: no owner or parcel counts on any of eighteen pages against TVA's eight, right-of-way width on one page against TVA's routine disclosure, route mileage on nine against TVA's seventeen. Dominion, which files a certificate case, points to the docket instead — fourteen of eighteen pages carry an SCC case number.

So the claim this volume makes is about TVA and about Oncor, on the records examined, and not about utilities generally. **Where a utility files a siting case, its page can be thin because the record of the case exists elsewhere. Where no case is filed, there is no such record, and what the page omits is omitted from everything a property owner is sent to.** That is the narrower proposition, and it is the one Chapter 15 carries.

Endnotes

Note numbering follows Chapter 14 as it stood on 17 August 2026, so a reader comparing the two documents can match them note for note. Chapter 12 note 40's cross-references to "Appendix E note 11" and "Appendix E notes 1–5" now resolve to notes 11 and 1–5 of this appendix.

Grades: [P] primary, [S] corroborated secondary, [S[1]] single source, [I] author inference.

1. TVA, `GeneSIS_Layers` FeatureServer, service root, owner `mbeierle0@tva.gov_tva`, retrieved 15 Aug. 2026; service description quoted verbatim, dated `202507301441` by TVA. Captured in `TVA_org_and_NorthGallatin_20260815.json`, deposit 10.5281/zenodo.21959989. **[P]**
2. Layer 1, `returnCountOnly=true`, no where-clause: 151,858. Retrieved 15 Aug. 2026. **[P]**
3. `capabilities: "Query"`; anonymous access, no token presented. **[P]**
4. Distinct `(CNTYNAME, STNAME)` values on layer 1, retrieved 15 Aug. 2026. **[P]**
5. Chapters 10, 11 and 12. The statement is a juxtaposition and is marked as one. **[I]**
6. Distinct `STUDYPHASE` values on layer 1: one non-null value, "Initial Feasibility Processing." **[P]**
7. `AREA_DESC` null across all returned records. **[P]**
8. Chapter 10 §10.4 and note 15; Chapter 5 §5.8. **[P]**
9. Stated as a limit rather than a finding. **[I]**
10. Distinct `SITEALIAS` count query returning 115,573; sample of 1,640 values inspected. **[P]**
11. `COUNTY` and `STATE` null throughout; `CNTYNAME` and `STNAME` populated. A `COUNTY` filter returns zero for every county. **[P]**
12. Layer 1 field list, captured in the layer metadata bundle. **[P]**
13. `gis_archive_20260815/MANIFEST.txt`, entry "NOT captured, deliberately." **[P]**
14. Appendix D; Oncor/LCRA Permian CCN layers, captured 15 Aug. 2026. **[P]**
15. `Tennessee_Volume_VA_Falsification_Test_v0_1.md`, 18 Aug. 2026. Eighteen Dominion Energy Virginia project pages, captured and coded against this volume's three codes; the eighteen captures are deposited under the filenames `DOM_page_capture_*_20260818.txt`. The Virginia set is a purposive sample rather than a census and the two counts of eighteen are not the same kind of number. **[P]** **Open item, Appendix F §F.1.**

Appendix F — What This Volume Has Not Established

F.1 Open items

Every endnote in this volume that carries an undischarged limit ends *Open item, Appendix F §F.1*. A limit is undischarged when the note records something this volume does not establish and further work could: a document not obtained, a search not run or not described to the standard this volume applies to TVA's own negatives, or evidence cited and not deposited. Two things are deliberately not marked, because neither is a gap that work would close: a scope decision, where something was not captured on purpose and the appendix says so; and a caution about how a figure should be read. There are **ninety-five**, and the list below is the set of notes carrying that marker, which is why it can be checked with a single search rather than taken on trust:

> Ch1 n.10 · Ch2 nn.4, 6, 8, 22, 24, 28 · Ch3 nn.5, 7, 14 · Ch4 nn.2, 10, 17, 21 · Ch5 nn.6, 16 · Ch6 nn.5, 6, 8, 18, 19, 24, 32, 39, 40, 44, 48, 62 · Ch8 nn.2, 4, 25, 31, 32 · Ch9 nn.15, 17, 18 · Ch10 nn.2, 4, 14, 21, 26 · Ch11 nn.2, 5, 13, 14, 19, 21, 27 · Ch12 nn.1, 2, 3, 4, 9, 19, 20, 21, 22, 26, 27, 28, 31, 33, 34, 35, 36, 38, 39, 40, 43 · Ch13 nn.3, 5, 8, 9, 10, 11, 12, 13, 14, 17, 20, 23, 25, 26, 30, 32, 34, 35, 39, 44 · Ch14 nn.1, 4, 5, 12 · Ch15 n.12 · App. E n.15

The marker is the volume's own designation, so the list can be checked with a single search. What follows groups the larger ones by kind. The grouping is illustrative and does not partition the list; identifications this volume grades probable and not established, and inferences it marks as the author's, are in the enumeration and in no group below.

Documents not obtained. The Cheatham condemnation docket, so the ten-dollar figure rests on one newspaper's quotation of a filed document and the volume cannot say which document. TVA's May 2025 route release for the Belmont Stage 2 line. The Governor's release and three *Commercial Dispatch* articles in Chapter 13. The Lowndes County Board of Supervisors minutes. A TVA Office of the Inspector General examination and the Final Environmental Impact Statement in Chapter 13. Two reports in Chapter 11. Cheatham County's Appendix A, Table I. The correspondence appendices of the Bristol and North Dayton environmental assessments, and the Bristol finding of no significant impact itself. Two paywalled Cheatham articles. The adopted Cheatham ordinance in its own text.

Searches not run, or run without being described. The categorical exclusion register has not been searched for generation actions in Sumner County, which bounds the negative at Chapter 5 §5.8 and Chapter 10 §10.4. The four-county data-centre negative at Chapter 12 §12.7 has no terms, date range or sources on record and is stated as an absence rather than as a searched negative. Chapter 11 note 2's search is under-documented on the same test, and Chapter 9 notes 17 and 18 read only "No source located" — those two carry §9.7, so the narrowing of the chapter's central claim rests on two undescribed negatives. No docket

search stands behind Chapter 12 §12.6's landowner count. Several Internet Archive checks were never run.

Evidence cited and not deposited. The 764-item paginated response, captured in full on 26 August 2026 and manifested at Appendix D §D.10, but not in the deposit. The Internet Archive CDX responses behind §6.6.2. The GeneSIS county parcel counts. The Fiberon service items. The working files listed at §F.2. The nineteen captures of 24 August 2026, hashed at Appendix D §D.9, and the one capture of 26 August at §D.10.

Claims flagged for confirmation or repair. The corridor mileages behind the merged-set ratios at Chapter 8 note 25, which should be re-derived from the deposited layers. The 29-parcel and 30-right-of-way service counts. The Transpark East identification and the LCUB and BTES expansions, both unsourced. The Governor's remarks at Chapter 11 §11.4, unsourced. A quotation to be checked against the printed page at Chapter 10. An elision to be restored or marked at Chapter 12. A quotation to be checked against the article at Chapter 13. The SteelCorr renaming date. A 2016 TVA fact sheet whose figures should be refreshed. A single-outlet report of the February 2026 pause and the March site meeting. The letter quoted at §2.1A. The Associated Press report at Chapter 12 §12.3, for which a full citation and a TVA source are still wanted.

Comparisons not run. One anchors to an endnote, at Chapter 8 note 32; the other two record work never begun and anchor to nothing. A second investor-owned utility, so the Virginia comparison rests on one templated page set. The corridor dissolve-and-remeasure that would settle whether studied miles are distinct land. An independent second coder on the eighteen Tennessee purpose statements.

F.2 Cited and not deposited

Working files cited and not deposited. Fourteen files are cited in the published apparatus, have no DOI and are not in the deposit. The list is generated by scanning the assembled volume for every filename it cites, differencing that against the fifty-eight-row manifest at Appendix D §D.3 and the twenty captures at §§D.9 and D.10, and excluding this appendix's own references.

File	Citations
TVA_Unpublished_Projects_Research_v0_1.md	7
TVA_CE_Determination_Research_v0_1.md	7
TVA_Org_Enumeration_v0_1.md	5
tva_tss_register_v0_1.csv	4
TVA_Register_Crosswalk_v0_1.md	2
Tennessee_Volume_VA_Falsification_Test_v0_1.md	2
HANDOFF_Tennessee_Transmission_Volume.md	2
TVA_Sumner_Gallatin_Meta_v0_1.md	2
Tennessee_Volume_Driver_Matrix_v0_1.md	2
Citation_Standard_v0_1.md	1
Tennessee_Statewide_Report_v1_0_source.md	1
build_register.py	1
appendixA_field_detail_v1_0.csv	1
build_appendixA_fields_csv.py	1

Four carry weight the volume cannot do without. TVA_CE_Determination_Research_v0_1.md is the full derivation behind the 11,899 determinations. TVA_Unpublished_Projects_Research_v0_1.md carries the searches behind two negative findings. Tennessee_Volume_Driver_Matrix_v0_1.md carries the central claim at Chapter 14 §14.7. And Citation_Standard_v0_1.md is the standard four endnotes measure themselves against.

On the citation standard. Four endnotes measure themselves against "§4 of the citation standard" — Chapter 12 note 35 and Chapter 13 notes 8, 10 and 26. That standard is Citation_Standard_v0_1.md, listed above as cited and not deposited, so a reader cannot presently check any of the four. Its §4 requires that a source cited in print be archived, that a negative be stated as the search that failed rather than as a fact, and that a document not read in its authoritative text not be cited as though it were.

ABOUT THE AUTHOR

Tommy N. Turner is an independent researcher and writer who documents the local-government and energy dimensions of the data center build-out. His series of jurisdiction-level case studies covers the counties and the fall-line corridor where Virginia's data center decisions have been made, refused, or contested, and the analytical volumes extend that work into the systems those decisions run on: the transmission network and the cost-allocation machinery in the first volume, and here a federal corporation that sites its own lines across seven states with no external body to approve them. Like the rest of the series, this volume is assembled from primary records: TVA's published project pages and the GIS layers its siting engineers draw on, its eight registers of completed categorical exclusion checklists, environmental assessments and findings of no significant impact, the *Federal Register*, the Tennessee and Mississippi codes, a 1982 report of the General Accounting Office, county zoning resolutions and board minutes, and eighteen Dominion Energy Virginia project pages coded as a control. His work spans data center fiscal and environmental policy, local public finance, and the governance questions the two raise, and he writes opinion and analysis on Virginia public affairs for outlets including the *Richmond Times-Dispatch*, the *Virginia Mercury*, the *Virginian-Pilot*, the *Roanoke Times*, *Cardinal News*, and *RTO Insider*. Since July 2026 he has served on the advisory board of *Data Centers and the Southern Energy Buildout: Implications for Electricity Costs, Energy Transition, and Energy Justice*, a three-year study at Emory University funded by the Alfred P. Sloan Foundation. The case studies and analytical volumes are published as open, citable editions, each pinned to a deposited evidence archive. He works from Williamsburg and Christiansburg, Virginia.

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