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Executive Summary
This project investigates ten large investor-owned utility companies as historically central to the climate change countermovement, a complex network dedicated to opposing climate action and undermining science for the last three decades. It identifies these utilities as part of a tight-knit historical cohort comprised of coal, rail, and utility companies, three carbon-intensive industries that have driven the extraction, transportation, generation and distribution of America’s primary historical source of energy.

Specifically, each profile first investigates each company’s business and political relationships with coal and rail companies. Our research found that many of the same coal and rail companies were doing business with the profiled utilities—again and again. Furthermore, through the membership, leadership, and funding of the same business associations, think tanks, and climate denial coalitions, this elite industry cohort have coordinated on anti-climate efforts for decades. Several of the country’s most formidable climate denial groups are in fact dominated by this industry trio.

Each profile further analyzes each utility company’s future climate plans. Each of the ten utilities have recently published emissions reductions plans that initially appear ambitious, many planning to reduce emissions by 80% or more by 2050. Our analysis of these documents find that many utilities primarily plan to replace coal with natural gas as opposed to renewable energy, and rely heavily on not-yet-marketable technological solutions. While the utility industry’s transition away from coal may point towards historical coal-rail-utilities alliances fracturing, the outsized future reliance on natural gas and innovation demonstrated by many utilities calls the industry’s decarbonization commitments into question.

Key Findings:
An elite cohort of coal, rail, and the utility companies have long nurtured close business relationships, and have coordinated closely in anti-climate action political organizations.

All major utility companies have future plans on climate change that initially appear ambitious. In reality, most demonstrate intensive future investment in natural gas and reliance on not-yet-marketable technologies.
Introduction

Since 1989, U.S. federal climate policy has been besieged by concerted, coordinated attempts to undermine and corrupt the people and policies that threaten corporate profits. Throughout this decades-spanning campaign, an elite cohort of carbon-intensive electric utility giants have established themselves as a key player alongside the oil, coal, and rail industries as well as conservative philanthropic actors like the Koch Brothers. This group of utility companies has spent millions on candidates, lobbying, and think tanks, exerted political influence through coalitions and business associations, and ultimately established themselves as central in the climate change countermovement. **This report will profile ten such companies, investigating their historical business and political relationships, activity undermining climate action, and future plans to address climate change.** By compiling these companies’ climate histories into one compilation, this report illuminates emergent patterns in their economic and political relationships, historical strategies against climate action, and dynamic current approaches to climate change.

An analysis of the business and political networks historically maintained by the ten utility companies reveals close economic and political affiliations of an elite cohort of coal and rail companies. This cross-industry alliance represents three carbon-intensive industries that have driven the extraction, transportation, generation, and distribution of America’s primary historical source of electricity. Specifically, our research found that many of the same coal companies (Peabody Energy and Murray Energy among others), and almost exclusively the same four rail companies (BNSF, CSX, Union Pacific, and Norfolk Southern), were doing business with the profiled utilities again and again.

This analysis further investigates each utility’s membership, leadership, and funding of business associations, think tanks, and climate denial coalitions long dedicated to anti-climate action efforts. It finds **these companies to have demonstrated dedicated affiliation with climate change countermovement organizations across the board.** These companies have historically coordinated this effort with the same coal and rail companies with which they consistently do business; several of the country’s most formidable climate denial groups, including active juggernaut America’s Power, have been historically dominated by this industry trio. Many of the ten utilities have also engaged in anti-climate action lobbying efforts on
federal and state levels, been exposed for regulatory violations, pollution and public health offenses, and even bought towns to preserve their carbon-intensive business models.

This report further analyzes each utility company’s emissions reductions plans. Many official goals appear ambitious, planning to reduce emissions by 80% or more by 2050. However, most plans indicate primarily replacing coal-fired electricity by aggressively investing in natural gas infrastructure as opposed to renewable energy; American utilities added over 90,000 megawatts (MW) of natural gas generation capacity between 2017 and 2018, compared to less than 2,000 MW of solar. Each plan also includes not-yet-marketable technologies as part of its emissions reductions schemes, including carbon capture and sequestration, super batteries, and Hydrogen-based power. Furthermore, a study conducted by the Energy and Policy Institute shows that many of the profiled utilities plan to significantly slow their infrastructural decarbonization rates in the coming decade. These findings may have significant implications on political, economic, and ecological dynamics: While the utility industry’s departure from coal may point towards a fracturing of the historically well-coordinated coal-rail-utilities

cohort, its demonstrated future reliance on natural gas offers a rapidly emerging impediment to climate action.

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<tr>
<td>SOUTHERN COMPANY</td>
<td>50% emissions reductions from 2007 levels by 2030; five to nine greenhouse gas emissions by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Decreased</td>
<td>Natural Gas</td>
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<tr>
<td>AMERICAN ELECTRIC</td>
<td>70% emissions reductions from 2000 levels by 2030; 80% by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Decreased</td>
<td>Renewables</td>
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<tr>
<td>DUKE ENERGY</td>
<td>60% emissions reductions from 2005 levels by 2030; net-zero emissions from electricity generation by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Decreased</td>
<td>Natural Gas</td>
</tr>
<tr>
<td>DOMINION ENERGY</td>
<td>60% emissions reductions from 2000 levels by 2030; 80% by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Decreased</td>
<td>Renewables</td>
</tr>
<tr>
<td>FIRSTENERGY</td>
<td>90% emissions reductions from 2005 levels by 2045</td>
<td>No, expanding gas infrastructure</td>
<td>Decreased</td>
<td>Unspecified</td>
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<tr>
<td>AMEREN</td>
<td>80% emissions reductions from 2005 levels by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Increased</td>
<td>Natural Gas</td>
</tr>
<tr>
<td>DTE ENERGY</td>
<td>80% emissions reductions from 2005 levels by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Increased</td>
<td>Natural Gas/Renewables</td>
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<tr>
<td>ENTERGY</td>
<td>50% emissions reductions by 2000 levels by 2030</td>
<td>No, expanding gas infrastructure</td>
<td>Increased</td>
<td>Natural Gas</td>
</tr>
<tr>
<td>CONSUMERS ENERGY</td>
<td>90% energy from “clean sources” by 2040</td>
<td>No, expanding gas infrastructure</td>
<td>Increased</td>
<td>Renewables</td>
</tr>
<tr>
<td>XCEL ENERGY</td>
<td>80% emissions reductions from 2005 levels by 2030; 100% carbon-free electricity by 2050</td>
<td>No, expanding gas infrastructure</td>
<td>Increased</td>
<td>Renewables</td>
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Fig. 3: Each utility company’s emissions reductions plans initially appear ambitious, but many plan for aggressively expanding natural gas infrastructure and slowing decarbonization rates in the coming decades. About half plan for natural gas to serve as their #1 fuel in the future, while the other half plan for renewables. Decarbonization rate based on Energy and Policy Institute data.

Studies have found that actual levels of methane leakage during natural gas production and transportation is likely 60% higher than the government reports. This figure is especially concerning considering that methane, the primary component of natural gas, has an 86 times higher warming effect than carbon dioxide per unit mass in the short term (20 years). Continued investment in natural gas could lock economies into prolonged reliance on a fossil fuel whose true climate impact has yet to be fully understood.

The effort to promote natural gas has recently materialized into a concerted political priority: In September 2019, the natural gas industry created the Empowerment Alliance, a major coordinated effort to oppose rapid decarbonization leading up to the 2020 presidential election. The Empowerment Alliance, which does not disclose its funders, advocates for the continued expansion of natural gas use as an alternative to large-scale adoption of renewable energy under the Green New Deal policy umbrella.

2 “Major studies reveal 60% more methane emissions.” Environmental Defense Fund. https://www.edf.org/climate/methane-studies
Alongside their longtime allies in the coal and rail industry, these ten large, carbon-intensive utility companies have been deeply entrenched in the climate change countermovement. However, some utility companies have demonstrated openness to renewable energy futures. Firms like Xcel Energy and Consumers Energy appear to be embarking on substantive transitions towards carbon-neutral energy generation. Others, in response to investor pressure, have more modestly discontinued affiliations with climate change countermovement organizations. Even Southern Company and American Electric Power, historically among the worst offenders on climate, plan to cut ties with anti-climate coalition America’s Power at the end of 2019. This review shows that these firms have a deep record of historical opposition to climate action, and many have current emissions reductions plans that current science suggests are not nearly ambitious enough. Utilities sell energy, not fossil fuels. Therefore their business models are not the same as those of the gas, coal, and oil industries. With renewable electricity generation increasingly as cheap or cheaper than fossil fuel generations and battery storage technologies constantly improving, utility companies represent a possible future ally to clean energy advocates. To facilitate this shift, utility companies will need to cease their affiliations with climate denial groups and advance renewable energy investment in the place of natural gas.

Each profile will include:

- An Operations section that outlines each company’s major infrastructure and cross-industry business relationships.
- A Political Activity section that describes each company’s political engagement through historical activity, lobbying efforts, and organizational affiliations.
- A Looking Ahead section that analyzes each company’s future climate plans, highlighting official climate goals and critically analyzing demonstrated efforts towards achieving them.

The Appendix section includes:

- Research Methods, including why these companies were chosen, descriptions of research methods for each section, and the limitations of this research.
- Key Countermovement Organizations, explaining and giving examples of how the business associations, think tanks, denial coalitions, and coal and rail companies referenced throughout this report fit into the climate change countermovement.

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Research Methods

The electric utility companies in this study were selected based on quantitative and qualitative metrics. 8/10 companies appeared in Brulle’s 2019 study titled *Networks of Opposition: A Structural Analysis of U.S. Climate Change Countermovement Coalitions 1989 – 2015*. This study used a quantitative network analysis tool to determine the centrality of various organizations to the climate change countermovement. Preliminary research on these companies’ well documented anti-climate action political activities and affiliations, along with expert advice, solidified these selections. This research also identified Dominion Energy and Entergy as important to include in the report. Each of these ten electric utilities have historically featured fleets of carbon-intensive, high capacity generating infrastructure. They have each also maintained wide scopes in terms of budget, customers, regional coverage, services provided, and emissions; they are ten of the United States’ top forty energy producers.7

Several other large American utilities share similar characteristics and could have been included in this study, including but not limited to: NextEra Energy, Arizona Public Service, PG&E, AES, PPL, and NRG.

The “Operations” section of these profiles relies on a June 2019 United States Department of Energy Energy Information Administration (EIA) data set, [EIA-923](https://www.mjbradley.com/sites/default/files/Presentation_of_Results_2019.pdf), which documents the fuel receipts and costs of American power plants. This data lists power plants in the United States, the types of fuel they use for electricity generation, the companies supplying those fuels, and the mines and other facilities which they operate. This information allowed for identifying business relationships between coal and gas extraction companies and electric utilities. Furthermore, many mining or rail companies publicize their transportation infrastructure, which allowed for expanding the map of business relationships to include rail companies as well. The operations section of each profile utilizes this resource to identify the coal and rail companies that supply fuel to about three major power plants operated by each utility; the plants chosen are selected on the basis of high generating capacity and/or controversy.

The “Political Activity” and “Looking Forward” sections leverage open access information that exists online. Using similar research methods as Brulle’s *Networks of Opposition* paper, this report uses existing accountability platforms including Sourcewatch, DeSmogBlog, OpenSecrets, media content, and corporate publications. The research faces the limitation of nondisclosure laws: most of the companies political organizations are not legally obligated to publish data on membership, funding, and leadership of political organizations. Companies do often post reports for non-tax deductible political spending, like campaign contributions and funding reserved for lobbying. This report used such heavily as a way financially linking organizations, while acknowledging that the figures may only scratch the surface of actual corporate contributions through membership dues, third party ‘philanthropic nonprofits’ like Donor’s Trust, and otherwise. This limitation is denoted by an asterisk in each company’s political affiliations tables.

This report’s review of each company’s emissions reductions plan identifies and analyzes relevant corporate reports. It supplements this information with examples of corporate rhetoric or action around climate change that serves to partially substantiate or undermine each company’s claims.

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Key Countermovement Organizations

For reference throughout the report.

Business Associations
The business associations included in this report are diverse. Some represent economy-wide business interests and operate on an incredibly wide array of policy issues. Others represent the interests of more narrowly defined industry groups. Business associations are generally 501(c)(6) organizations, meaning that they are not legally required to disclose most information pertaining to political membership, and funding. Their activities often include lobbying, public relations, legal work, campaign contributions, and coalition building. Highlighted below are some of the most relevant business associations referenced in this report.

**Edison Electric Institute (EEI):** Founded in 1933, EEI is the American utility industry’s primary trade association. All the utility companies profiled in this report are members of EEI; executives from several have recently held EEI leadership positions. Tom Fanning, President & CEO of Southern Company and EEI Chairman 2013-17 has made public statements questioning climate science, and EEI has been documented fighting climate policies such as net metering and distributed solar power. EEI collaborated with lawmakers on the Waxman-Markey carbon-pricing bill while simultaneously contributing to organizations and politicians aggressively opposing it.

**United States Chamber of Commerce (USCC):** The USCC is often considered one of the most powerful non-government organizations in Washington, D.C. Claiming to be a coalition of millions of American businesses, the USCC primarily promotes deregulatory policy most pertinent to large corporations. The USCC has historically been an active perpetrator of climate denial, articulated by the rhetoric of USCC environmental policy figures like Bill Kovacs and Christopher Guith. A report by UK-based think tank Influence Map named the USCC as the United States’ #1 most successful group in blocking climate action.

**National Association of Manufacturers (NAM):** NAM is a similarly large and influential industry group long active in advancing climate denial and obstructionism, representing the #2 most successful organization on Influenced Map’s climate policy opposition power rankings. Notably, NAM has hosted front groups like Partnership for a Better Energy Future and leads the Manufacturers’ Accountability Project, a platform devoted to investigating the climate accountability community— or in their own words, “The concerted, coordinated campaign being waged by trial lawyers, public officials, deep-pocketed foundations and other activists who have sought to undermine and weaken manufacturers in the United States.”

Other trade associations featured this report include: Utility Air Regulatory Group, American Coal Ash Association, American Gas Association, Western Fuels Association, Nuclear Energy Institute

Denial Coalitions
The organizations identified as “denial coalitions” in this report refers to a spectrum of industry coalitions and public relations industry-run front groups established from 1989-2015. These groups were dedicated to entrenching climate denial narratives and obstructing climate policy action. Noted below are some of the
denial coalitions most relevant to this study; all twelve are detailed in this 2018 CDL report.

**Global Climate Coalition (GCC):** The GCC is widely considered the fossil fuel industry’s first organization devoted to climate denial and obstructionism. Active from 1989-2002, the GCC represented a cross-industry alliance of the climate change countermovement’s historical worst offenders, working together to defeat regulatory climate policies, the Kyoto Protocol, and more.

**American Coalition for Clean Coal Electricity (ACCCE):** The ACCCE, recently rebranded as America’s Power, primarily represents coal, rail, and utility companies. Founded in 2008, with an annual budget of $45 million and acting today as these industries’ primary political platform, ACCCE’s organizational roots stretch back to 1992: the Center for Energy and Economic Development (CEED, 1992-2008) and Americans for Balanced Electricity Choices (ABEC, 2000-2008) merged into ACCCE in 2008. The two groups historically possessed much of the same membership, leadership, and funding of ACCCE, so this merger was little more than a rebranding event. Collectively, the three denial coalitions have engaged in lobbying, public relations campaigns, and lawsuits to fight the Kyoto Protocol, EPA regulations, carbon pricing legislation, and more.

The American Legislative Exchange Council (ALEC) is structurally different than the other organizations listed here, broadly classified as denial coalitions. Operating under the airtight secrecy afforded by 501(c)3 status, DeSmogBlog defines ALEC as “designed to link state legislators with corporations and create templates for state legislation.” Such corporations include ExxonMobil and Koch Industries. ALEC has been effective in advancing diverse deregulatory policies, including anti-climate legislation, largely beyond the reach of the public eye. ALEC has invited climate denying scientists to speak at conferences while acknowledging climate change as a reality in official reports.


**Coal Companies**

There are many coal companies included in this report. Three companies that emerge repeatedly in the coal-rail-utility supply chains described in each profile’s “Operations” sections, also shown to be central actors in the climate change countermovement, include Peabody Energy, Arch Coal, and Murray Energy. It should be noted that some major coal companies have experienced mergers, bankruptcies, and rebranding in recent years, and not all of the companies discussed in this report still exist. Contura Energy and Alpha Natural Resources’s 2018 merger, bankruptcy, and dealings with Blackjewell LLC is one example of this complex caveat.

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**Peabody Energy**: Peabody Energy was recently documented as the twelfth highest global carbon dioxide contributor at over 15 billion tons since 1965. It has held membership of 4/12 denial coalitions and the USCC, and has received multiple member awards by ALEC. Peabody executives have held leadership positions in at least the CEED and USCC. Its 2018 non-deductible trade association contributions form notes funding to the ACCCE, USCC, and National Mining Association (NMA) for lobbying.

**Arch Coal** has held membership in CEED, ABEC, and ACCCE, while **Murray Energy** has held membership in CEED and ACCCE. Arch and Murray, along with most other coal companies, have not published further information describing political contributions and affiliations. Other notable companies include Blackjewell LLC, Consol Energy, Alliance Resource Partners, Contura Energy, Massey Energy, and Cloud Peak.

**Rail Companies**

Four rail companies—Burlington Northern Santa Fe (BNSF), CSX, Union Pacific, and Norfolk Southern—service the coal-fired power plants used in this report almost exclusively, pointing towards their outsized control over the coal freight industry. BNSF, owned by Warren Buffett’s Berkshire Hathaway, does not publish political contributions reports. Thee other three companies’ total non-deductible lobbying spending to the USCC, NAM, and the Association of American Railroads (AAR), was calculated at almost $30 million from 2012-18. The same three freight companies have belonged to at least six denial coalitions, contributing $3.4 million in lobbying spending 2012-18 to America’s Power. BNSF have belonged to five denial coalitions. The four companies were all present at ALEC’s 2011 annual conference as either “Trustees” ($5,000 contribution) or “Directors” ($10,000 contribution).

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Company Analyses: Operations, Political Activity, Looking Ahead

Southern Company

According to Sourcewatch, Southern Company is currently “the eighth largest utility company in the world, the second largest in the U.S. and the largest in the southeastern U.S.” The $49 billion energy giant owns and operates over 42,000 megawatts of generation capacity and provides electricity and natural gas to 9 million customers in Alabama, Georgia, Florida and Mississippi. Southern Company emitted 98 million metric tons of CO₂-equivalent in both 2017 and 2018, almost 2% of total U.S. emissions in 2017.20 Its supply of electricity comes predominantly from coal and natural gas.21 22

Operations

Southern Company’s many subsidiary companies operate some of the United States’ largest and most emitting coal-fired power plants. According to 2018 EPA data, Southern Company’s James H. Miller Steam Plant in West Jefferson, Alabama, Scherer Steam Generating Station in Juliette, Georgia, and its Bowen Steam Plant in Cartersville, Georgia are the first, second, and tenth highest emitters respectively, at about 18.4, 16.7, and 13.4 million metric tons of CO₂-equivalent.23 According to Sourcewatch, these Southern Company plants and others rank highly in other pollution metrics such as coal waste, coal ash toxins, and mercury emissions.24 25

EIA data shows that these high profile coal-fired power plants source their fuel via large and politically active coal and railway companies. Scherer Steam Generating Station and Miller Steam Plant ship all of

their coal from Wyoming’s Powder River Basin, the source of approximately 40% of American coal.26 Companies operating these Wyoming mines include coal giants such as Peabody Energy, Alpha Natural Resources, Arch Coal, and Kennecott Energy Company. All seven of the Wyoming mines serving the three listed Southern Company power plants operate through Burlington Northern Santa Fe (BNSF) railroad company on a railroad built for transporting product from the coal-rich basin across the country and the world.27 In 2009, BNSF was bought for $34 billion by Warren Buffet’s Berkshire Hathaway, and has operated as a subsidiary since.28

Southern Company’s Bowen Steam Plant sources its coal from across the American midwest, including mines in Illinois, Indiana, and Pennsylvania. These mines are operated by companies including Consol Energy, Alliance Natural Resources, and Foresight Energy (a subsidiary of Murray Energy). Consol Energy’s Bailey Mine is part of Consol’s Pennsylvania Mining Complex, a group of underground mines in southwestern Pennsylvania that have dual access to rail lines operated by Norfolk Southern and CSX.29 Norfolk Southern also operates in Alliance Natural Resources’ Galatia Mine.30 Foresight Energy’s MC#1 mine in southern Illinois is part of the company’s Sugar Camp Energy complex, which has access to railways operated by Canadian National, Norfolk Southern, CSX, BNSF and Union Pacific.31

Southern Company’s many subsidiaries also operate extensive natural gas infrastructure. EIA data lists many of Southern Company’s compressed natural gas-fired power plants as coming from “various sources.” Southern Company Gas reports pipeline infrastructure connecting gas resources in the Marcellus Shale Formation and the Gulf of Mexico to a network of power plants, compressed and liquified natural gas storage and export facilities, and consumer distribution services.

Southern Company Gas is partnering with Duke Energy, Dominion Energy, and Piedmont Natural Gas to develop the proposed Atlantic Coast Pipeline, a project that includes 600 miles of new pipeline across the American midwest and south along with three natural gas compressor stations.32 Southern Company had contributed $83 million to the project by the end of 2018.33 The $7 billion project would cross National Park Service land. Originally approved by the National Forest Service, a US Circuit Court ruled against its construction on questions of jurisdiction. The issue will be heard by the Supreme Court.
Southern Company is also a 20% owner in the PennEast Pipeline, a 120 mile project currently under construction in Pennsylvania and New Jersey.  

**Political Activity**

Southern Company is widely regarded as intense and consistent player in the climate change countermovement since its emergence in the late 1980’s.

**Southern Company and Pre-Hanson Era Climate Investigations**

The Energy and Policy Institute’s July 2017 “Utilities Knew” report outlines the role that Southern Company played in the early climate change countermovement, despite its early knowledge of the climate risks of burning fossil fuels. For example, in 1964, Southern Company was involved with an Interdepartmental Energy Study report titled “Energy R&D & National Progress” that identified carbon dioxide as a fossil-fuel derived pollutant to be controlled. In 1985, Southern Company co-chaired a session titled “Effect of Increasing CO₂” during an annual Air Pollution Control Association meeting. The session featured detailed scientific analysis as evidenced by an archived copy of its proceedings. In the decades between, it can be assumed that Southern Company was at a minimum involved in ongoing climate research through the Edison Electric Institute (EEI) and the Electric Power Research Institute (EPRI). After 1988, amidst growing calls for action on the issue, Southern Company led disinformation campaigns to manufacture doubt about climate science and block legal limits on carbon emissions from power plants.

**Lobbying, Political Contributions, and Recent Activity**

From 1998 until 2019, OpenSecrets reports Southern company spending about $229 million on lobbying. The highest spending year was 2012, in which Southern Company spent $15.58 million; in 2018, they spent $12.3 million.

This decades-long lobbying effort has mobilized internal Southern Company lobbyists and a diverse fleet of dozens of lobbying firms. One notable example of such firms is Bracewell LLP (formerly Bracewell and Guiliani), which has received sums between $100,000 and $590,000 from Southern Company every year since 2004. Bracewell has ties to Big Tobacco and contracts across carbon-intensive industries including utilities (Duke Energy, DTE Energy, Ameren), coal (Arch Coal), oil and gas (Valero Energy, Interstate Natural Gas Association of America), and automotive (Honda, Yamaha). Bracewell partner Jeffery Holmstead was an assistant administrator in George W. Bush’s EPA and was a front-runner for deputy administrator in Trump’s EPA.

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34 Ibid.
## Business Associations

Note: *indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying). NON-DEDUCTIBLE LOBBYING SPENDING LIKELY REPRESENTS A FRACTION OF TOTAL CORPORATE CONTRIBUTIONS (see appendix p. 8).

| United States Chamber of Commerce (USCC) | **Membership:** Current member.39  
**Leadership:** Board of Directors representation 2016-17.40  
**Funding:** $2,235,000 from 2015-2018.*41  
**Activity:** Jim Leverette, Southern Company Senior Research Engineer, spoke at a July 2019 Global Energy Institute conference titled Energy Innovates: All In.42 |
| National Association of Manufacturers (NAM) | **Membership:** Current membership.  
**Leadership:** Board membership at least 2005-present, executive committee representation since 2013.43  
**Funding:** $131,403 from 2015-18.*44  
**Activity:** Axios reported that Energy Advance Center (EAC) began working out of the NAM in 2018, coalition including Southern Company, ExxonMobil, BP, Chevron, Mitsubishi.45 |
| Edison Electric Institute (EEI) | **Membership:** Southern Company and three of its subsidiaries are currently EEI members.46  
**Leadership:** Tom Fanning, Chairman/President/CEO of Southern Company, served as EEI Chairman 2013-17.47  
**Funding:** Open Secrets reports Southern Company funding in almost every spending cycle since 1998; 1,646,490 from 2015-18.*49 |

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42 “EnergyInnovates: All In.” *U.S. Chamber of Commerce.* [https://www.uschamber.com/event/energyinnovates-all](https://www.uschamber.com/event/energyinnovates-all)


46 “Members List.” *Edison Electric Institute.* [https://www.eei.org/about/members/uselectriccompanies/Documents/memberlist_print.pdf](https://www.eei.org/about/members/uselectriccompanies/Documents/memberlist_print.pdf)


| Utility Air Regulatory Group (UARG) | Membership: Current member.  
 |
| Electricity Reliability Coordinating Council | Membership: Current member.  
Funding: $776,728 from 2015-18.  
 |
| **Denial Coalitions** |  |
 |
Leadership: ICE President Gale Klappa was also executive vice president, chief financial officer and treasurer of Southern Company.  
 |
Leadership: Charles McCrary, President of Generation for Southern Company, former CEED Chairman. Southern Company listed as “Board Members.”  
 |
 |
 |
| Americans for Clean Coal Electricity (ACCCE) | Membership: 2008 until current.  
 |
 |
Funding: $300,000 from 2015-2018.*

*indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying)

Climate Skeptics

Dr. Willie Wei-Hock Soon (Willie Soon), a climate science denier and physicist at the Harvard-Smithsonian Center for Astrophysics, received at least $409,000 in funding from Southern Company Services in the decade prior to 2015, according to documents obtained by Greenpeace and reported on by The New York Times. Soon frequently testified to lawmakers over the course of several years.

Looking Ahead

Rhetorical Framings

Southern Company’s April 2018 report “Planning for Low-Carbon Futures” begins with a letter from CEO Thomas Fanning citing environmental considerations as one of many forces shaping Southern Company’s energy decisions, which ultimately prioritize low prices and consumer preferences. The report that follows contextualizes emissions reductions plans as an effort to stay below the global temperature benchmark of 2°C above pre-industrial levels established in the 2015 Paris Agreement. By contrast, when asked in a March 2017 interview with CNBC’s ‘The Squawk Box’ whether carbon dioxide is climate change’s “primary control knob,” Southern Company CEO Thomas Fanning (also a former chairman of the Edison Electric Institute) responded, “No, certainly not. Is climate change happening? Certainly, it’s been happening for millenia. That’s not the issue, okay?”

Official Commitments

Southern Company has a goal of 50% emissions reduction from 2007 levels by 2030, “low to no GHG emissions” by 2050. In its filing with the CDP, a corporate environmental disclosure database, Southern Company clarifies that “low-to-no carbon” means an 80-100% emissions reduction. No official corporate reports articulate quantitative plans for a future energy mix.


Accountability

Southern Company states, “We do not intend to invest further in our existing thermal coal fleet, unless the investment ensures safety, affordability or reliability to serve customers or to comply with federal or state laws.” Coal infrastructure has declined from 70% to 30% of Southern Company’s energy mix from 2007-18. However, in 2017, Southern Company was fighting for new coal infrastructure in Mississippi: Its proposed Kemper Power Plant was proposed as a poster child for ‘clean coal’ technologies, but after failing to receive approval from Mississippi regulators and $3.4 billion in losses, it was reconstructed to burn natural gas.

Southern Company reports are ambiguous as to how they plan to replace their historically coal-dominated energy mix to meet their “low-to-no GHG emissions” goal. Their 2018 Planning for a Low-Carbon Future report and Energy Mix pages largely leave out mention of future investment in natural gas infrastructure. Southern Company’s 2019 10-k form, however, clarifies that natural gas-fired generation increased from 15-46% 2007-18, citing conversions of coal-fired power plants to gas generation as a climate adaptation measure. Southern Company Gas increased revenue by $240 million in 2017, further pointing towards

Southern’s natural gas investments. By contrast, renewables have only grown from 3-10% from 2005-2017.

The more public-facing Southern Company publications emphasize technological innovation and renewable energy as a principal pathway towards emissions reductions. For example, Southern Company emphasizes their operation of the United States Department of Energy’s (DOE) National Carbon Capture Center, R&D in Hydrogen-based power, and forms of renewable energy including their “over 20 megawatts of landfill gas resources.”

Statements made by executives in Southern Company subsidiaries Georgia Power and Alabama Power have indicated that they may be failing to meet or ignoring company-wide decarbonization goals.

The Energy and Policy Institute’s article titled “Southern Company’s Low-To-No Carbon Pledge Misleads Investors, Public” further details various weaknesses and misrepresentations in Southern Company’s climate plan, including examples of its political influence over regulatory institutions and inconsistencies between investor-facing and public-facing publications.

70 Ibid.
American Electric Power

Founded in 1906, American Electric Power (AEP) is a $40.9 billion electric utility company based out of Columbus, Ohio. AEP serves 5.8 million customers across eleven states: Arkansas, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia, and West Virginia. With over 223,000 miles of distribution lines and 40,000 miles of transmission lines, AEP has the largest electricity transmission system in the United States.

Operations
Currently, AEP’s electricity generating capacity comes from 47% coal, 28% natural gas, and 7% nuclear, along with wind, pumped hydro, and other sources. AEP’s highest capacity power plant is the John E. Amos Plant in Winfield, WV, followed by Rockport Plant in Spencer County, Indiana and the James M. Gavin Plant in Cheshire, Ohio. All three are coal-fired. According to 2018 EPA data, Gavin Plant is the 8th highest emitting power plant in the United States, Amos the 13th highest emitting, and Rockport the 19th highest emitting. These plants respectively emitted approximately 14.5 million, 12.5 million, and 11.4 million metric tons of CO₂-equivalent in 2018.

AEP and its subsidiaries own, lease, or control much of their own coal distribution infrastructure, including thousands of railcars, hundreds of barges, and several towboats. In addition, all three of AEP’s largest coal-fired power plants source much of their coal from mines in West Virginia and surrounding states, operated by coal giants such as Contura Energy, Murray Energy, and their subsidiaries. Murray is the largest privately owned coal company in the United States, with subsidiaries including Consolidation Coal and American Energy (both of which operate mines that supply coal to AEP power plants). Murray owns locomotives, rail cars, and other coal transportation infrastructure, though the company also transports coal through CSX railroad company.

Political Activity

Early History
Like Southern Company, AEP was involved in the Interdepartmental Energy Study’s 1964 report “Energy R&D & National Progress,” a federal report prepared for President John F. Kennedy which established carbon dioxide as a fossil-fuel derived pollutant to be controlled. Over a decade later, in 1976, AEP paid to run an ad in the New York Times that advocated for “coal and conservation” as a solution to the energy crisis of the 1970s, stating that “we must expand our use of coal.”

Lobbying, Political Contributions, and Recent Activity
From 1998 through 2018, Open Secrets reports AEP spending about $94 million on lobbying. Their highest spending year was 2008, in which AEP spent $11.24 million. According to the 2011 report “For Hire: Lobbyists or the 99%?,” AEP spent more on lobbying than it paid in taxes, with a -9% tax rate between 2008 and 2010. AEP self-reports that a total of just over $1 million of their 2018 trade association dues and payments went towards lobbying.

In 2008, American Electric Power was “the single largest energy contributor” to Congressional candidates, both Republican and Democratic; the following year, the Waxman-Markey Bill failed in the Senate. In 2018, AEP spent $269,600 on corporate political contributions including $100,000 to the Republican Governors’ Association, $60,000 to the Democratic Governors’ Association, and smaller donations to other PACs and campaigns at the state and local level.

AEP’s PAC, the American Electric Power Committee for Responsible Government, gave a total of $73,500 to eleven members of the Ohio House who voted to support a bill bailing out uncompetitive coal-fired power plants and eliminating Ohio’s energy efficiency and renewable energy standards. AEP’s contributions included $30,000 to Ohio House Speaker Larry Householder. Tom Froehle, Vice President of External Affairs at AEP, also testified in support of the bill, under which AEP Ohio could collect additional coal subsidies from customers totaling around $207 million by 2030.

In September 2019, AEP (along with 46 other of the largest U.S. publicly-traded companies) received a letter from major investors calling out the discrepancy between the goals of the Paris Agreement and the

85 Ibid.
goals and lobbying activities of AEP itself, requesting “greater transparency and accountability” because investors “need to know if they are lobbying – or supporting trade organizations that are lobbying – against the worldwide effort to rein in climate change.”

**Business Associations**

<table>
<thead>
<tr>
<th>Organization</th>
<th>Membership</th>
<th>Funding</th>
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</thead>
<tbody>
<tr>
<td>United States Chamber of Commerce (USCC)</td>
<td>Current member</td>
<td>$100,000* to the Chamber in 2018, over $1.2 million* cumulatively 2011-14</td>
</tr>
<tr>
<td>Edison Electric Institute (EEI)</td>
<td>American Electric Power and all seven of its subsidiaries are currently EEI members. Nicholas Akins, Chairman/President/CEO of AEP, served as EEI Chairman 2013-16.</td>
<td>Open Secrets reports AEP funding in every spending cycle since 2002, except 2004. In 2013, AEP subsidiaries Appalachian Power Company (APCo) and Wheeling Power Company each reported $351,799</td>
</tr>
</tbody>
</table>

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94 Ibid.

95 Ibid.


<table>
<thead>
<tr>
<th>Utility</th>
<th>Membership</th>
<th>Notes</th>
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</thead>
<tbody>
<tr>
<td>Utility Air Regulatory Group (UARG)</td>
<td>Member until UARG disbanded in 2019, while under investigation by members of Congress.</td>
<td></td>
</tr>
<tr>
<td>American Coal Ash Association (ACAA)</td>
<td>Current member.</td>
<td></td>
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</tbody>
</table>

*Indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying)

**Denial Coalitions**

<table>
<thead>
<tr>
<th>Utility</th>
<th>Membership</th>
<th>Notes</th>
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</thead>
<tbody>
<tr>
<td>Center for Energy and Economic Development (CEED)</td>
<td>2004-2007.</td>
<td>AEP is listed in CEED’s archived Board Member directory.</td>
</tr>
</tbody>
</table>

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102 Ibid.


109 Ibid.

**American Coalition for Clean Coal Electricity (ACCCE)**  
**Membership:** 2008-present; one of two major investor-owned utilities remaining (along with Southern Company).\(^{111}^{112}^{113}\) Set to discontinue membership at the end of 2019.\(^{114}\)  
**Leadership:** In 2017, AEP CEO Nicholas Akins was on ACCCE’s board of directors. He has since left the position.\(^{115}\)  
**Funding:** $10,000* in 2018.\(^{116}\) In 2013, APCo and Wheeling Power Company reported $177,476 in membership dues to ACCCE.\(^{117}\) APCo sought to recover these membership dues from customers, stating that they included “no lobbying expenses.”\(^{118}\)

**American Legislative Exchange Council (ALEC)**  
**Funding:** AEP cut ties with ALEC in 2015, no longer paying membership dues as of 2016.\(^{119}\)

### Looking Ahead

**Rhetorical Framings**

In their 2019 Corporate Accountability Report, AEP states that “climate change is a significant issue facing AEP and other companies” and that “in 2019, climate change was formally added to AEP’s enterprise risk ‘watch’ list.”\(^{120}\) In a 2017 interview, CEO Nicholas Akins criticized Trump’s withdrawal from the Paris Climate Accord, adding that AEP would still be “continuing on [their] path of moving to a clean energy economy.” The company describes itself as being “at the forefront of the energy industry’s transformation” with “next-generation sustainability goals.”\(^{121}\) At the same time, AEP maintains that their stance on climate change is consistent with that of the Edison Electric Institute, the U.S. Chamber of Commerce, the American Coalition for Clean Coal Electricity, Business Roundtable, and the Global Sustainable Electricity

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https://www.desmogblog.com/american-coalition-clean-coal-electricity

http://www.americaspower.org/about-accce/members/

https://www.energyandpolicy.org/aep-clean-coal-attacks-renewables/

https://www.eenews.net/stories/1061700247

115 Ibid.


https://www.energyandpolicy.org/aep-clean-coal-attacks-renewables/

118 Ibid.


https://www.aepsustainability.com/sustainability/reports/

https://www.aep.com/about/ourstory/cleanenergy
As of July 2019, AEP purports “support with minor exceptions” for legislation on cap and trade, energy efficiency, and clean energy generation; they oppose a carbon tax.123

Official Commitments
AEP aims to cut carbon dioxide emissions 70% by 2030 and 80% by 2050, both as compared to 2000 levels.124 In September 2019, AEP announced that it was updating its 2030 carbon dioxide emissions reduction target from 60% to 70% following faster emissions reductions than the company had initially anticipated. AEP also stated that it was “confident” it would reach over 80% emissions reductions by 2050. CEO Nicholas Akins called zero emissions by 2050 the company’s “aspirational emissions goal,” explaining that reaching zero emissions would require “technological advances” not currently commercially available.125 AEP’s plans for a cleaner energy future include expanding regulated wind and solar energy by 2030, investing $2.2 billion in contracted renewables by 2023, modernizing the power grid, education on energy efficiency for customers, and promoting broader use of electric vehicles.126 AEP also opposed the Obama-era EPA’s Clean Power Plan, which established the first-ever national limits on carbon emissions from existing power plants, and supported its rollback by the Trump administration.

Accountability
AEP’s energy generation capacity has gone from 70% coal-fueled in 2005 to 45% today. In that time, the company’s renewable generation capacity has increased from 4% to 17% and its natural gas capacity has increased from 19% to 28%.127 AEP’s future emissions reduction plans include decreased but still significant electricity generation from coal and natural gas.

AEP reports reducing its carbon dioxide emissions 59% from 2000 to 2018; even taking into account this shift, AEP was still the top carbon dioxide emitter among electric power companies in the United States in 2012 and 2015.128 Researchers from the University of Massachusetts Amherst ranked AEP as the 56th worst corporate air polluter and 5th worst corporate greenhouse gas emitter in the United States, based on data from 2017.

AEP has historically dragged its feet on emissions reduction efforts. In 1999, the Justice Department sued AEP for violating the Clean Air Act by failing to use best available control technology in construction. In 2007, AEP agreed to install $4.6 billion of emissions reduction equipment and pay civil fines amounting to $15 million, as well as $60 million in further environmental and public health project funding. This was the largest environmental enforcement settlement in the history of the United States.

The company also tabled plans for what would have been one of the nation’s largest carbon capture and storage projects. After applying for and receiving a grant from the Department of Energy for the project, AEP halted the project in 2011 due to an unfavorable political climate (namely, a weak economy and a congressional stalemate on climate policy).130

In the public nuisance suit AEP v. Connecticut, several states and land trusts sued AEP and four other of the highest-emitting utility companies for their contributions to climate change and resistance to lowering emissions.131 The Supreme Court unanimously sided with the utility companies in 2011, claiming that the matter should be resolved through its authority to regulate carbon, rather than in the courts.

In the past, AEP has taken drastic steps to avoid legal accountability for damages that their company might cause. In 2002, AEP bought the town of Cheshire, Ohio, which is adjacent to one of its largest coal-fired power plants, the James M. Gavin Power Plant. The $20 million buyout included an agreement that homeowners in Cheshire would never sue AEP for damage to property or health caused by the plant.

Duke Energy is one of the country’s largest energy providers, supplying 51,000 MW of electricity to 7.7 million retail customers in North Carolina, South Carolina, Florida, Ohio, Indiana and Kentucky. It is also the 2nd most valuable utility company in the US, with a market cap of nearly $64 billion. Headquartered in Charlotte, North Carolina, the company also provides natural gas services to 1.6 million customers in the Carolinas, Ohio, Kentucky, and Tennessee via 33,000 miles of pipelines.

In 2012, Duke merged with Progress Energy, another utility giant, which served 3 million customers at time of merger. Duke’s list of subsidiaries is extensive, including state-specific branches in the Carolinas, Ohio/Kentucky, Indiana, and Florida.

**Operations**

Currently, Duke’s electricity generating capacity comes from 34% natural gas, 33% nuclear, and 31% coal. It emitted 105 million tons of CO₂-equivalent in 2018, accounting for roughly 2% of all US carbon dioxide emissions for that year. Duke operates 13 coal-fired plants and 31 gas-fired plants.

Duke’s largest singular power plant is Gibson Station, located in Gibson, Indiana. The plant features over 3,000 MW of generating capacity, approximately 6% of Duke’s total capacity. In 2017, the plant released 16 million tons of carbon dioxide, making it responsible for 0.32% of total US carbon dioxide emissions for that year. The plant sources coal from several Indiana mines owned by companies including Peabody Coal and Alliance Coal. In 2016, the Center for Public Integrity ranked the Gibson plant as the country’s largest ‘super polluter’ when accounting for both carbon dioxide and toxic air emissions.

Duke’s second largest coal-fired power plant is the Belews Creek Steam Station, located in Belews Creek, North Carolina. The facility, which generates more than 2200 MW of electricity, emitted nearly 8.5 million tons of CO$_2$ in 2017. Belews Creek’s coal is sourced from mines in West Virginia, Kentucky, and Pennsylvania. Those mines are controlled by companies such as Contura Energy and Alpha Natural Resources, which recently merged to become one of the country’s largest coal producers, Blackjewel LLC.

Duke’s third largest coal-fired plant, Marshall Steam Station, is also in North Carolina. Generating just shy of 2,100 MW, the plant sources most of its coal from the same sources as Belews Creek. It is serviced by both CSX and Norfolk Southern Railways. In 2016, Norfolk Southern’s former CEO Wick Moorman joined Duke’s board of directors.

Duke has an extensive natural gas network, servicing both large-scale electricity generation and the cooking and heating needs of 1.5 million customers. Duke maintains nearly 28,000 miles of natural gas service pipelines for customer end-use, and more than 33,000 miles of natural gas transmission and distribution pipelines for generation purposes. Duke plans on measures to expand its natural gas pipeline network, including co-ownership of the proposed Atlantic Coast Pipeline with Dominion Energy, Piedmont Natural Gas, and Southern Company.

**Political Activity**

**Early History**

Representatives from Duke Energy and Cinergy (now a subsidiary) attended a 1995-6 GCC’s Science and Technical Advisory Committee meeting formulating language around climate change. Duke Energy was among the more than 50 utilities that assisted in the development of a 1971 report that included research on the “effects of CO2” from power plants on the environment among the industry’s R&D goals through the year 2000.

**Lobbying, Political Contributions, and Recent Activity**

Since 1998, Duke Energy has spent just shy of $90 million on lobbying. Notably among lobbying groups hired by Duke is Bracewell LLP.

In 2016 Duke was a top contributor to the ‘Senate Leadership Fund’, a PAC supporting Republican Senate leadership. Duke’s donations were joined by other fossil fuel dependent companies including Chevron.

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145 Ibid.

In 2017 Duke received more in federal subsidies than they paid in taxes, resulting in a \textit{federal tax rate of minus 5.9\%}.\footnote{“U.S. companies found ways to avoid taxes before tax cut bill.” \textit{Reuters}. \url{https://www.reuters.com/article/usa-tax-corporations/u-s-companies-found-ways-to-avoid-taxes-before-tax-cut-bill-report-idUSL1N1RN263}} Additionally, the company was found to have made \textit{illegal donations to North Carolina state politicians}.

In 2010, while Duke was in the process of building its new, $2.9 billion coal gasification plant, Duke executive James Turner offered inappropriate benefits to the chairman of the Indiana Regulatory Commission, including luxury boat rides. Turner and the chairman, David Harvey, also exchanged sensitive information about former state employees who were then hired by Duke.\footnote{“Duke Energy Ethics Scandal.” \textit{CBS News}. \url{https://www.cbsnews.com/news/duke-energy-ethics-scandal-another-exec-taken-down-by-email/}}

### Business Associations

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<thead>
<tr>
<th>United States Chamber of Commerce (USCC)</th>
<th>Membership: Current member.\footnote{“US Member Company Links.” \textit{Edison Electric Institute}. \url{<a href="https://www.eei.org/about/members/uselectriccompanies/Pages/usmembercolinks.aspx%7D%7D">https://www.eei.org/about/members/uselectriccompanies/Pages/usmembercolinks.aspx}}</a></th>
<th>Funding: $50,000 in membership dues in 2019, as of June.\footnote{Ibid.}</th>
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### Denial Coalitions

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<tr>
<th>Denial Coalition</th>
<th>Membership:</th>
<th>Leadership:</th>
<th>Funding:</th>
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<tbody>
<tr>
<td>Global Climate Coalition (GCC)</td>
<td>1993-1998, along with current subsidiaries Carolina Power &amp; Light, Cinergy, and Cincinnati Gas &amp; Electric</td>
<td>Mike Stroben represented Duke on the GCC’s Science &amp; Technology Assessment Committee.</td>
<td></td>
</tr>
<tr>
<td>Alliance for Energy and Economic Growth (AEEG)</td>
<td>2001-2010.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Legislative Exchange Council (ALEC)</td>
<td>Member as of at least 2018.</td>
<td>Duke is the former corporate co-chair of Indiana and South Carolina branches. Duke has historically had representatives on ALEC’s Energy, Environment, and Agriculture Task Force.</td>
<td>Duke paid $25,000 per year in membership fees, and spent $116,000 sponsoring meetings between 2009 and 2012. Duke was a “Director” level sponsor of the 2015 ALEC Annual Conference ($10,000 contribution), and &quot;Vice Chair&quot; level sponsor of ALEC's 2016 Annual Conference ($25,000 contribution). North Carolina State Representative Mike Hager, a former Duke engineer, sponsored a 2013 bill to scrap pre-existing Renewable Energy and Policy Institute.</td>
</tr>
</tbody>
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156 “Global Climate Coalition documents reveal the electric utility industry’s role in notorious climate denial campaign.” Energy and Policy Institute. 


160 “Duke Energy Quits Scandal-Ridden American Coalition For Clean Coal Electricity.” Think Progress. 

161 “‘Revealed: Names of ALEC Lobbyist and Legislator Members.’” PR Watch. 

162 American Legislative Exchange Council, “Solutions for the States,” 38th Annual Meeting agenda, on file with the Center for Media and Democracy, August 3-6, 2011


164 Ibid.

165 “ALEC Conference Funding Dominated by Big Polluters.” PR Watch. 

166 “ExxonMobil Top Sponsor at ALEC Annual Meeting.” Center for Media and Democracy. 
Duke has dropped associations with noted climate denial coalitions like the National Association of Manufacturers, American Coalition for Clean Coal Electricity, and the Utility Air Regulatory Group over climate change positions and lobbying scandals.167 168 169 170

Looking Ahead
Rhetorical Framings
In recent years, Duke has made a larger commitment to a sustainable climate future. According to President and CEO Lynn Good, “Our customers want and deserve a cleaner energy future, requiring bold steps, smart investments and collaboration today to ensure a brighter future.” In its 2017 Climate Report to Shareholders, Duke stated that, “The actions of no one country, industry or company can singlehandedly influence a changing climate. It is the cumulative impact of these actions that can make a difference. Over the past decade, we’ve incorporated carbon emissions into our long-term planning, helping inform our investment strategy and mitigating future risks.”171

Official Commitments
In fall 2019, Duke Energy committed to net-zero emissions by 2050. It also committed to cutting its emissions in half by 2030.172 According to the company’s ‘Carbon Reduction Factsheet’, Duke has already exceeded Paris Accord US reduction goals, met the 2030 goals of the now defunct EPA Clean Power Plan, and reduced emissions by 31% relative to 2005 levels.

Accountability
To achieve its emissions reductions goals, Duke plans to “to at least double our portfolio of solar, wind and other renewables by 2025,” and “continue deploying low-cost natural gas to speed the transition from coal”.173 Duke also plans to continue investing in its existing carbon neutral infrastructure, such as its 11,000 MW of nuclear capacity in the Carolinas.174 According to its 2017 Shareholder Climate Report, Duke also

173 Ibid.
174 Ibid.
plans on retiring 9 coal plants with a combined 2,006 MW of capacity by 2024, in addition to the 47 facilities it retired between 2011 and 2017.175

Duke’s climate report suggests that it plans to primarily power its transition to lower emissions with natural gas.176 Duke is currently constructing 4 natural gas facilities.177 Although it does plan on doubling its solar, wind, and hydroelectric capacity from 5-10% by 2030, it anticipates a much more significant increase in natural gas generation, from 28-42% on the same timeframe.178 Duke plans on adding as much as 15,000 MW of natural gas capacity in the Carolinas and Indiana.179 For reference, the Energy and Policy Institute reports that by 2033 Duke “plans to build 9,534 MW of gas capacity in the Carolinas alone,” adding “only 3,671 MW of solar capacity in the Carolinas across the same timeline.”180 Its spending patterns reflect those goals as well—of the $11 billion it has earmarked for cleaner energy, only $2.7 billion are allocated for renewables.181 Duke spokesperson Randy Wheeless told UtilityDive, “As we retire old coal, in most cases we will replace that with natural gas.”182

In order to reach its net-zero emissions by 2050 goals, Duke also notes that not-yet-marketable systems including “nuclear with the ability to load follow, natural gas combined cycle with carbon capture and storage, and closed-cycle biomass generation” are likely to be necessary complements to the energy mix.183 Duke does incorporate carbon pricing on its emissions, and uses “a range of prices… to reflect a range of potential policy outcomes.”184

In 2017 the Duke Board of Directors rejected a shareholder proposal to create a more comprehensive assessment of the company’s climate change impacts.

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176 Ibid.
183 Ibid.
184 Ibid.
Dominion Energy is a publicly-traded energy and utility company based in Richmond, VA. The $64.25 billion company recently merged with SCANA, another utilities giant based in South Carolina; SCANA is now a wholly-owned subsidiary of Dominion. The company serves nearly 7.5 million customers in 18 states, including Virginia, South Carolina, North Carolina, Wyoming, Idaho, and Utah, among others.

Operations
Currently, Dominion and its subsidiaries’ energy portfolio consists of: 32,000 MW of electric generation capacity; 95,000 miles of transmission and distribution lines; nearly 1,600 miles of natural gas transmission, gathering, and storage pipelines; almost 93,000 miles of gas distribution pipeline; and approximately 1 trillion cubic feet of natural gas storage capacity. In 2017, the company’s electricity generation capacity came from 43% nuclear, 37% natural gas, 15% coal, 10% oil, and 4% renewables.

Mount Storm Power Station
West Virginia’s Mount Storm Power Station is Dominion Energy’s highest generation capacity coal-fired power plant. The plant, which consumes 15,000 tons of coal daily, sources its coal from Bailey Mine in Pennsylvania and Mettiki General Mine in Maryland. Bailey Mine is a part of CONSOL Energy’s Pennsylvania Mining Complex; coal is transported to the power plant by Norfolk Southern and CSX. Mettiki General Mine is operated by Mettiki Coal LLC, a subsidiary of Alliance Resource Partners.

Greensville Power Station
The natural-gas fired Greensville Power Station is one of Dominion’s newest electricity generation facilities and began operation on December 8, 2018.196 Greensville sources its gas internally.

Cove Point LNG Facility
Cove Point LNG is a liquified natural gas (LNG) import and export facility on the Chesapeake Bay (MD) that imports gas from countries including Trinidad, Nigeria, Norway, Venezuela and Algeria.197 The facility has a capacity of 4.6 billion cubic feet (BCF) and a daily send-out capacity of 1.8 BCF.198 It connects to the Transcontinental Gas Pipeline, which is owned and operated by Williams Energy.199 200 Gail India, a natural gas company owned by the Government of India, has a 20-year deal to purchase LNG from this facility.201

Political Activity
Lobbying, Political Contributions, and Recent Activity
In 2013 and 2016-2019, Dominion Energy has spent an aggregate of approximately $8.41 million on lobbying, already having spent $2.38 million in 2019.202

Dominion Energy’s federal lobbying efforts have mobilized a mix of internal lobbyists, a third of whom are revolving door lobbyists.203

Dominion’s political contributions efforts also utilize a “bundling” strategy, exposed in 2017 by the Richmond Times-Dispatch, in which high ranking Dominion officials or retirees coordinate contributions in tandem with the company.204

Business Associations

| United States Chamber | Membership: At least 2018.205 |

199 Ibid.
Denial Coalitions

<table>
<thead>
<tr>
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</tr>
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<tbody>
<tr>
<td><strong>Global Climate Coalition (GCC)</strong></td>
<td>Virginia Power, a subsidiary of Dominion, was a member of the GCC. 215</td>
</tr>
<tr>
<td><strong>Alliance for Energy and Economic Growth (AEEG)</strong></td>
<td>Dominion Resources was a member from 2002-2010. 216</td>
</tr>
<tr>
<td><strong>Consumer Energy Alliance</strong></td>
<td>Aggregate sum of $262,000 since 2015, peak funding of</td>
</tr>
</tbody>
</table>

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206 Ibid
208 Ibid.
212 “Political Contributions.” Dominion Energy. [https://www.dominionenergy.com/company/governance/political-contributions](https://www.dominionenergy.com/company/governance/political-contributions)
Looking Ahead

Rhetorical Framings
Dominion Energy Chairman, President, and CEO Thomas F. Farrell II’s statement in the company’s 2018 Climate Report asserts that, “Climate change is one of the most challenging issues of our time, and Dominion Energy has been deeply engaged in the worldwide effort to limit global temperature increases. Our stakeholders want cleaner energy. We intend to deliver it.”

In the same address, Farrell writes, “But let’s be candid: Every consumer, every industry, and every nation has a role in shaping a clean energy future. No one can change the trajectory on their own, including the electric and gas industries in the United States. A clean energy future will require the transportation sector to go completely electric or to clean natural gas, and it will require countries around the world to do their part—especially in areas of rapid industrialization. Absent that, progress will remain slow. Everyone who uses energy will have to do their share: Private industry and public policymakers need to take actions that promote clean energy and protect economic prosperity—without unfairly burdening customers with the cost of this transition.”

Official Commitments
Dominion Energy has set a target to achieve a 60% reduction in their CO₂ emissions by 2030 from 2000 levels; they have thus far achieved a 52% reduction.219 The company has also set a goal to achieve an 80% reduction in CO₂ emissions by 2050 and a 50% reduction in their methane emissions by 2030 from 2010 levels.220

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Accountability
Dominion Energy recently announced plans to build a new pumped-hydroelectric storage facility in southwest Virginia. Additionally, the company has the fourth-largest solar portfolio among utility holding companies, and is “developing the largest offshore wind farm in the United States,” according to company statements.

Dominion Energy’s 2018 Climate Report cites the retirement of coal-fired generation infrastructure and investment in lower-emitting gas infrastructure as central facets of achieving its emissions reductions goals. The same report articulates plans for expanding renewable energy infrastructure while maintaining natural gas generation as an “indispensable” base load option. Dominion’s construction of Greensville Power Station, Cove Point LNG, and its partnership with Southern Company, Duke Energy, and Piedmont Natural Gas to build the Atlantic Coast Pipeline point towards the company’s eagerness to increase natural gas infrastructure not only for energy security, but for expansive electricity generation, transport, and export. Reconciling these investments with Dominion’s language of “lower emissions rate futures” raises questions about whether natural gas or renewables will be the driving force shaping Dominion’s less carbon-intensive energy futures.

Below are Dominion’s emissions reductions scenario analyses from their 2018 Climate Report. While their projected 2050 fuel mixes do in fact feature a substantial increase in renewables, the company says that natural gas will increase in importance through the mid-2030s. According to the same report, renewable energy infrastructure would not undergo significant buildout until the mid-2030s.

224 Ibid.
FirstEnergy is a publicly-traded energy and utility company based in Akron, Ohio. The $26.16 billion²²⁷ company owns 10 principal subsidiaries, all involved in the transmission, distribution, and generation of electricity. FirstEnergy and its subsidiaries provide electricity to 6 million customers in Ohio, Pennsylvania, West Virginia, Maryland, New Jersey, and New York.²²⁸

Operations

As of 2018, FirstEnergy and its subsidiaries own two coal-fired power plants and two pumped storage hydro facilities: Fort Martin Power Station, Harrison Power Station, Bath County Pumped Storage Hydro Facility, and Yards Creek Pumped Storage Hydro Facility. Together, these facilities can produce about 3,800 MWs;²²⁹ the coal-fired power plants generate 81.5% of the company’s electricity.²³⁰

A bankrupt subsidiary, FirstEnergy Solutions (FES), owns three coal-fired power plants: the Bruce Mansfield Plant in Pennsylvania, which is being deactivated; W.H. Sammis Plant in Ohio; and Pleasants Power Station in West Virginia. FES also owns several nuclear power plants in Pennsylvania and Ohio. FES plans to emerge from bankruptcy as a new and separate company called Energy Harbor.²³¹

Harrison Power Station

At almost 2,000 MW capacity, the coal-fired Harrison Power Station was in 2018 the second highest-emitting power plant in West Virginia.²³² It is now the 14th-highest greenhouse gas-emitting plant in the country.²³³ The plant uses more than five million tons of coal annually.²³⁴ In 2014, it was ranked as one of

https://www.marketwatch.com/investing/stock/fe
https://www.firstenergycorp.com/content/fecorp/about/generation_system.html
https://ghgdata.epa.gov/ghgp/
https://ghgdata.epa.gov/ghgp/
the worst 22 power plants in the United States by toxic air emissions and greenhouse gas emissions. The coal used at this plant is sourced from CONSOl Energy’s Robinson Run 95 Mine in West Virginia.

**Fort Martin Power Station**
The coal-fired 1,098 MW capacity Fort Martin Power Station is the fifth highest-emitting power plant in West Virginia. The plant uses more than 2.8 million tons of coal annually, sourced from Tunnel Ridge Mine (WV) and Cumberland Mine (PA). Tunnel Ridge Mine is operated by Alliance Resource Partners, including its subsidiary Tunnel Ridge LLC; coal is transported from the mine by barge and rail, by Norfolk Southern and CSX. Cumberland Mine is operated by Contura Energy (which emerged from the 2016 bankruptcy of Alpha Natural Resources) and Robindale Energy (which backed Edelman PR’s Energy Citizens climate obstructionist campaign). Coal is transported from the mine by barge and rail, the latter of which is operated by Norfolk Southern and CSX.

**Bath County Pumped Storage Hydro Facility**
Jointly operated by FirstEnergy and Dominion Energy, the Bath County Pumped Storage Hydro Facility is the world’s largest pumped storage facility. The facility stores energy for the Pennsylvania-New Jersey-Maryland Interconnection (PJM), a competitive wholesale electricity market that connects 13 states across the mid-Atlantic, south, and midwest. PJM member companies include Duke Energy, DTE Energy, Dominion, Southern Company, among others.
Political Activity
Lobbying, Political Contributions, and Recent Activity
From 1998 to 2019, OpenSecrets reports that FirstEnergy has spent an aggregate sum of approximately $42 million on lobbying; the highest spending year was 2018, in which FirstEnergy spent $3.1 million.248 FirstEnergy’s federal lobbying efforts have mobilized a mix of internal lobbyists and outside contractors. One notable FirstEnergy contractor is Jeff Miller, President and CEO of Miller Strategies LLC. In 2018, FirstEnergy paid Miller $440,000.249 Miller also lobbies for Energy Transfer (which owns the Dakota Access Pipeline) and Southern Company,250 and was Rick Perry’s campaign manager in 2016.251 Most of FirstEnergy’s third-party lobbyists, including Miller, are revolving-door lobbyists.252

Additionally, FirstEnergy Corp. Political Action Committee contributed $408,800 to federal candidates in the 2018 cycle (72% to Republicans), another $100,000 to the Republican National Committee, and $45,000 each to the National Republican Congressional Committee and the National Republican Senatorial Committee.253

FirstEnergy and FES have lobbied state lawmakers Ohio and the Trump administration for bailouts for their uncompetitive coal and nuclear power plants that could cost consumers billions of dollars. In 2019, FES and dark money groups linked to the utility spent millions of dollars in Ohio to pass House Bill 6, a coal and nuclear bailout that also halts the state’s renewable energy and energy efficiency standards for electric utilities.254

2018: “Documents reveal a lobbying blitz by FirstEnergy as Trump mulled bailouts for coal and nuclear power plants that could cost consumers billions.”255

Business Associations

| United States Chamber of Commerce (USCC) | Membership: At least in 2017 and 2018.256 257 |


249 Ibid.


<table>
<thead>
<tr>
<th>Organization</th>
<th>Membership</th>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Edison Electric Institute (EEI)</td>
<td>Current member</td>
<td>Funding: In all spending cycles since 1998, FirstEnergy and/or its</td>
</tr>
<tr>
<td></td>
<td></td>
<td>subsidiaries have funded EEI. In 2018, contributions totaled $245,000.*</td>
</tr>
<tr>
<td></td>
<td>while under investigation by members of Congress.</td>
<td>Activity: April 2019: FirstEnergy implicated in the US House of</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Representatives investigation into William Wehrum.</td>
</tr>
<tr>
<td>American Coal Ash Association (ACAA)</td>
<td>Current member</td>
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</tbody>
</table>

*indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying)

### Denial Coalitions

<table>
<thead>
<tr>
<th>Organization</th>
<th>Membership</th>
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</thead>
<tbody>
<tr>
<td>Global Climate Coalition (GCC)</td>
<td>Ohio Edison (now a FirstEnergy subsidiary) was a member.</td>
</tr>
</tbody>
</table>

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42
Americans for Balanced Energy Choices (ABEC)

Membership: 2007.269

Americans for Clean Coal Electricity (ACCCE)

Membership: 2008-2012.270

American Legislative Exchange Council (ALEC)


*indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying)

Looking Ahead

Rhetorical Framings

FirstEnergy’s CEO Charles E. Jones has said that, “At FirstEnergy, our mission is to make customers’ lives brighter, the environment better and our communities stronger.”272 Jones and FirstEnergy otherwise have generally avoided public discourse around climate change.

Official Commitments

FirstEnergy’s 2016 Sustainability Report established a goal to reduce carbon dioxide emissions company-wide by at least 90% below 2005 levels by 2045.

Accountability

While FirstEnergy’s emissions reductions goal is quite ambitious, the company’s 2018 10-K form fails to offer a substantive plan on how they intend to meet their targets. The company writes: “There are a number of initiatives to reduce GHG emissions at the state, federal and international level. Certain northeastern states are participating in the RGGI and western states led by California, have implemented programs, primarily cap and trade mechanisms, to control emissions of certain GHGs. Additional policies reducing GHG emissions, such as demand reduction programs, renewable portfolio standards and renewable subsidies have been implemented across the nation.”273

In fact, FirstEnergy has announced their intentions to expand their natural gas operations in Pennsylvania, Ohio, and West Virginia through development of the Marcellus shale gas formation and the Utica shale gas

The company also favors technological advancement as a primary approach to emissions reductions. It donated $2 million to the University of Akron to “support the development of carbon capture technologies and coal-based fuel cells for commercial use” and have referenced research with the Electric Power Research Institute into the benefits and impacts of plug-in electric vehicles.

In their 2019 Climate Report, FirstEnergy lays out their approximated generation fuel mix for 2030: coal (15%), zero carbon generation (60%), and natural gas (20%). It’s important to note that in this report, the company includes “fossil generation with carbon capture and sequestration” in its calculations for “zero carbon generation.”

First Energy’s emissions reductions goal does not cover the power it purchases, which formed 30 percent of its carbon emissions in 2017. Additionally, the company is transferring ownership of some coal-fired plants to FES, which will be counted as emissions reductions for FirstEnergy.

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Ameren Company is one of the US’s largest investor-owned utility companies, serving 2.4 million customers with roughly 16,000 megawatts of electricity across Illinois and Missouri, accounting for roughly 1.33% of the country’s entire electricity generation,278 as well as around 0.5% of all U.S. CO₂ emissions in 2018.280 The company also provides natural gas service to 900,000 customers. Ameren has a market cap of over $18 billion.282

Operations
While Ameren reports fail to articulate firm energy mix statistics, the graph on page 41 shows that the company’s electricity generation capacity comes predominantly from coal-fired plants.283 Ameren’s subsidiaries include its state specific branches, Ameren Missouri and Ameren Illinois, as well as smaller companies involved with electricity generation, freight, and transmission. Since the company sold multiple Illinois coal plants to Texas coal giant Dynegy in 2013, its largest power plants are all in Missouri including Labadie Energy Center (2372 MW, or roughly 15% of Ameren’s total capacity), Rush Island Energy Center (1178 MW) and Sioux Energy Center (972 MW).284 All three of these facilities are coal-fired.

None of the coal burned at these facilities are sourced from the Midwest; rather, all of their supplying mines are located in Wyoming.285 Two of these mines are among the country’s largest: Black Thunder Mine and North Antelope Rochelle Mine, both located in the Powder River Basin, and operated by Peabody Energy and Arch Coal, respectively. Both mines are serviced by the Burlington Northern Santa Fe Railroad.286

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284 Ibid.
Peabody Energy's Gateway Mine, located in Southern Illinois, is the only non-Wyoming coal source servicing these three Ameren generation facilities.287

Ameren services natural gas to 900,000 customers and generates less than 20% of its electricity through a distributed network of small (sub-1,000 MW) gas-fired power plants.288 Ameren Illinois was among the nation’s largest vendors of gas in 2017.289 Between Ameren Missouri and Ameren Illinois, the company owns more than 21,000 miles of natural gas transmission and distribution lines. Ameren anticipates expanding its natural gas network in the near future.

Political Activity
Early History
Representatives from Ameren precursors Illinois Power Company and Union Electric sent representatives to a 1995-6 GCC’s Science and Technical Advisory Committee meeting formulating language around climate change.290

Lobbying, Political Contributions, and Recent Activity
Since 1998, Ameren has spent more than $30 million on lobbying.291 Their lobbying expenditures peaked in 2009, the year that the EPA defined carbon dioxide as a pollutant and the Waxman-Markey cap and trade bill was debated in Congress. According to the Union of Concerned Scientists’ report, A Climate of Corporate Control, Ameren opposed the EPA’s 2009 Endangerment Finding, which ruled that carbon dioxide is a pollutant, and could be regulated as such.292 In that report, The Union of Concerned Scientists found that overall, Ameren’s anti-climate activity outweighed its pro-climate activity.293 In 2010 Ameren contributed $5,000 to ACCCE’s campaign to fight greenhouse gas regulation in California.294

Business Associations

| United States Chamber of Commerce | Funding: $137,500 in membership dues in 2013 |

| **Commerce** | **National Association of Manufacturers (NAM)** | **Membership:** Member as of 2018.296  
**Leadership:** Richard Harshman, Chair of Ameren Nuclear and Operations Committee, is a board member of NAM.297  
**Funding:** $10,000 or more each year in membership dues since 2015.298 |
|------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------|
| **Edison Electric Institute (EEI)** | **Membership:** Current member.299  
**Leadership:** Ameren Transmission Company of Illinois (subsidiary) Chairman and President Shawn Schukar holds multiple EEI leadership positions.300  
**Funding:** $189,489.04 in membership dues in 2018.301 |
| **Utility Air Regulatory Group (UARG)** | **Membership:** Current member.302 |
| **American Coal Ash Association (ACAA)** | **Membership:** Current member.303 |

### Denial Coalitions

| **Global Climate Coalition (GCC)** | **Membership:** Subsidiaries/absorbed entities Union Electric Company and Illinois Power Company were members before GCC dissolution.304  
**Activity:** Subsidiaries/absorbed entities Union Electric Company and Illinois Power Company sent representatives to the GCC’s Science and Technical Advisory Committee.305 |

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296 Ibid.
299 “US Member Company Links” Edison Electric Institute. [https://www.eei.org/about/members/uselectriccompanies/Pages/usmembercolinks.aspx](https://www.eei.org/about/members/uselectriccompanies/Pages/usmembercolinks.aspx)
303 “American Coal Ash Association” Sourcewatch. The Center for Media and Democracy. [https://www.sourcewatch.org/index.php/American_Coal_Ash_Association](https://www.sourcewatch.org/index.php/American_Coal_Ash_Association)
<table>
<thead>
<tr>
<th>Membership</th>
<th>Leadership</th>
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</thead>
<tbody>
<tr>
<td><strong>Center for Energy and Economic Development (CEED)</strong></td>
<td>2004-2007 <strong>306</strong>&lt;br&gt;<strong>Leadership</strong>: AmerenUE, a subsidiary of Ameren, is on CEED’s archived ‘Board of Directors’ list. <strong>307</strong></td>
</tr>
<tr>
<td><strong>Alliance for Energy and Economic Growth (AEEG)</strong></td>
<td>2001-2010 <strong>308</strong></td>
</tr>
<tr>
<td><strong>Americans for Balanced Energy Choices (ABEC)</strong></td>
<td>2007 <strong>309</strong></td>
</tr>
<tr>
<td><strong>American Coalition for Clean Coal Energy (ACCE)</strong></td>
<td>2008-2016 <strong>310</strong>&lt;br&gt;<strong>Funding</strong>: Ameren paid $152,500 in membership dues from 2012-2015. <strong>311</strong></td>
</tr>
<tr>
<td><strong>American Legislative Exchange Council (ALEC)</strong></td>
<td>No longer a member as of 2014 <strong>312</strong>&lt;br&gt;<strong>Leadership</strong>: Sponsor of ALEC’s 2011 meeting. <strong>313</strong></td>
</tr>
</tbody>
</table>

**Looking Ahead**

**Rhetorical Framings**

According to Ameren’s CEO and President Warner Baxter, “We are executing a comprehensive and balanced strategy that will meet the long-term energy needs of our customers in a safe, reliable and cost-effective manner, while significantly reducing carbon emissions and managing other key risks... Looking ahead, we will continue to invest in critical energy infrastructure and foster innovation as we remain focused on building a brighter and cleaner energy future for our customers, the communities we serve and our country.” **314**

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307 Ibid.
310 “American Electric Power says ‘We don’t agree with or share every position” of ACCCE, yet remains a member of the coal lobby group’. Climate Investigations Center. https://climateinvestigations.org/american_electric_power_says_we_don_t_agree_with_or_share_every_position_of_accce_yet_r_ems_a_member_of_the_coal_lobby_group/
Ameren specifically acknowledged climate change in their 2019 Climate Risk Report: “We recognize that climate change is a critical issue for our customers, our communities, our nation and our planet, and we are committed to do our part to protect and preserve the environment.”\textsuperscript{315}

**Official Commitments**
Ameren has pledged to decrease its emissions 35% relative to 2005 levels by 2030, 50% by 2040, and 80% by 2050. Its public-facing publications cite the retirement of old coal plants, construction of renewable resources, energy efficiency measures, and expansion of natural gas infrastructure as major steps in achieving these goals.\textsuperscript{316}

**Accountability**
Ameren plans to decrease emissions primarily by replacing coal-fired power plants with natural gas production. The utility plans to retire half of its coal-fired fleet by 2037 and completely phase out its coal-fired generation by 2050. As this graphic from Ameren’s “Building a Cleaner Energy Future” report demonstrates, natural gas electricity generation will occupy an outsized percentage of Ameren’s energy mix as compared to renewables; by 2050, the energy mix is set to be comprised of 41% natural gas, 17% renewable, and 42% “Non-Carbon Emitting Sources” or “unspecified.”\textsuperscript{317} This process has already begun—according to Ameren’s 2017 Integrated Resource Plan, the company is in the final stages of adding nearly 1,000 MW of natural gas capacity,\textsuperscript{318} a significant addition to its current 3,000 MW of natural gas-fired electricity generation (less than 20% of Ameren’s total capacity).\textsuperscript{319} In addition, Ameren anticipates a large percentage of generation to come from “non-carbon emitting sources” including “energy storage” or “new

\textsuperscript{315} Ibid.
\textsuperscript{316} Ibid.
\textsuperscript{318} Ibid.
technologies.” In some publications, Ameren refers to this category as “unspecified,” calling into question the legitimacy of

Ameren also has extensive plans to invest in renewables, specifically wind and solar. The utility plans on investing $1 billion to increase its electricity generated by wind.\textsuperscript{320} Ameren also plans on increasing total generation from solar \textit{by 2027}. The company is legally obligated to have at least 15\% future renewable generation, pursuant to \textit{Missouri’s Renewable Portfolio Standard}.\textsuperscript{321}

Ameren has demonstrated a mixed track record with compliance to environmental regulations and transparency. For example, in 2011, the United States Department of Justice successfully \textit{sued} Ameren on behalf of the Environmental Protection Agency for failing to comply with Clean Air Act standards.\textsuperscript{322} 323 The same year, Ameren also rejected shareholder requests for greater transparency regarding coal waste in 2011.\textsuperscript{324} In 2019, Ameren was implicated in a congressional probe investigating role of EPA employees in adjusting EPA regulations to match those of \textit{UARG’s} agenda, an organization that Ameren funded hundreds of thousands annually.\textsuperscript{325} 326

\textsuperscript{320} “Integrated Resources Plan.” \textit{Ameren}.  

\textsuperscript{321} “Building a Cleaner Energy Future: Climate Risk Report.” \textit{Ameren}.  

\textsuperscript{322} “Federal Court Finds Ameren Violated the Clean Air Act at Rush Island Coal Plant.” \textit{The Sierra Club}.  

\textsuperscript{323} Ibid.

\textsuperscript{324} “Request for coal waste information rejected at Ameren meeting.” \textit{STL Today}.  
\texttt{https://www.stltoday.com/business/local/article_d27390ae-a826-56c7-80d6-66eec40ab1c.html}

\textsuperscript{325} “E&C Leaders Launch Investigation of Secretive Front Group UARG and its ties to EPA Officials.” \textit{House Committee on Energy and Commerce}.  

\textsuperscript{326} “Oversight Letter re: UARG.” \textit{House Committee on Energy and Commerce}.  
DTE Energy is a publicly-traded energy and utility company based in Detroit, Michigan. The $23.96 billion company has four arms: Electric, Gas, Non-utility Operations, and Corporate/Other. DTE Energy’s infrastructure spans the Midwest, the Northeast, and Eastern Canada.

**Operations**

**DTE Electric**

The largest electric utility in Michigan, DTE Electric (formerly Detroit Edison) operates, generates, transmits, and distributes electricity to 2.2 million customers in Southeast Michigan. Currently, Duke’s electric utility generating capacity comes from 64% coal, 19% nuclear, 14% renewables, and 9% natural gas. The company operates the Monroe Power Plant, a coal and petroleum fired electric plant that in 2018 was the third largest carbon dioxide emitting plant in the US. The Monroe generating plant provided 43% of DTE Electric’s total 2018 power plant generation. The coal used at this plant is sourced from four mines in Wyoming’s Powder River Basin, all of which are operated by Arch Coal, Peabody Coal, and Cloud Peak Energy; coal from the Powder River Basin is transported by BNSF. Monroe’s coal is also sourced from Bailey Mine at CONSOL Energy’s Pennsylvania Mining Complex and transported by Norfolk Southern and CSX. The plant sources its petroleum from Marathon Oil and its petroleum coke from Koch Industries. Another one of the company’s power plants, the Belle River Power Plant, is the 44th largest carbon dioxide emitting plant in the US as of 2018.

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333 “About.” Consol Coal Resources LP. http://www.ccrlp.com/our-company/about
DTE Gas
The 12th largest natural gas utility in the US by volume of gas sold, DTE Gas is involved in the purchase, storage, transmission, distribution, and sale of natural gas to 1.2 million customers in Michigan; the company controls 34% of Michigan’s underground natural gas storage capacity. The company’s distribution system is directly connected to interstate pipelines, including the ANR Gas Pipeline. This is DTE Gas’s largest supply contract in terms of quantity of natural gas. The ANR Gas Pipeline is operated by TC Energy (formerly TransCanada). The company also operates joint ventures with Enbridge and National Grid, such as the NEXUS Pipeline and the Vector Pipeline.

Political Activity
Early History
In the 1960s, DTE Energy (then Detroit Edison) worked closely with other utility companies, such as Southern Company, to conduct research about the effects of carbon dioxide as a product of fossil fuel combustion; other groups involved include Edison Electric Institute, American Petroleum Institute, and Peabody Coal. In 1985, members of Detroit Edison attended the 78th Meeting of the Air Pollution Control Association, with a session titled “Effects on Increasing CO.” The session featured detailed scientific analysis as evidenced by an archived copy of its proceedings; it was co-chaired by Southern Company.

Lobbying, Political Contributions, and Recent Activity
From 1998 to 2019, OpenSecrets reports that DTE Energy has spent nearly $34 million on lobbying. The highest spending year was 2000, in which DTE Energy spent $3.72 million; in 2018, the company spent $1.01 million.

DTE’s decades-long lobbying efforts include the mobilization of the company’s internal lobbyists and also the utilization of external lobbying firms. One notable example of such a firm is Bracewell LLP. In 2011, the firm received $110,000 from DTE Energy; from 2012-2018, the firm has received $120,000 from DTE Energy annually.

Since 2011, when DTE Energy began contracting Bracewell LLP to lobby on the company’s behalf, about two thirds of DTE Energy’s lobbying fleet has been comprised of revolving door lobbyists, the majority of

which work at Bracewell LLP. From 2011 to 2016, Bracewell LLP partner and revolving door lobbyist Jeffrey Holmstead lobbied on behalf of DTE Energy’s interests; Holmstead is notorious for opposing pollution policy and climate policy.

Since 2011, DTE Energy has been the highest funder of Michigan Senate President Pro Tempore Aric Nesbitt, who is now chairman of the Senate Regulatory Reform Committee donations total $69,500. In March 2019, Nesbitt introduced a state resolution to oppose the Green New Deal. Nesbitt has received a rating of 100% from the American Conservative Union, which has sponsored climate denial conferences organized by the Heartland Institute.

In 2012, DTE Energy partnered with CMS Energy, another Michigan-based utility company whose main subsidiary is Consumers Energy, to defeat a ballot measure that would have required utility companies source 25% of their electricity from renewables; DTE Energy contributed $12,197,123 to defeat this ballot measure.

Jerry Norcia, DTE Energy President and CEO, is on the Board of Directors of the American Gas Association (AGA) and is a director of the AGA front group Your Energy America (YEA). The group, active since 2017, is a natural gas advocacy group that undermines climate policy and environmental campaigns. The front group sponsored the Virginia Chamber of Commerce’s 2017 Energy and Sustainability Conference, where a speaker on behalf of YEA said the event was created to “follow on these radical and uniformed elements within your communities that try to intimidate or shut down pro-energy supporters.”

### Business Associations

<table>
<thead>
<tr>
<th>United States Chamber of Commerce (USCC)</th>
<th>Funding: $100,000 in 2017.*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Leadership: Board membership at least 2006-2018. Peter Oleksiak, DTE Energy Senior VP and CFO, serves on the board of NAM.</td>
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</tbody>
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344 Ibid.
<table>
<thead>
<tr>
<th>Organization</th>
<th>Membership</th>
<th>Leadership</th>
<th>Funding</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Edison Electric Institute (EEI)</strong></td>
<td>Current membership</td>
<td>Gerard Anderson, DTE Energy Executive Chairman, former company president and CEO, is a vice chairman of the EEI board and co-chairman of the EEI Committee on Environment.</td>
<td>Funding: $91,810 in 2017.*</td>
<td></td>
</tr>
<tr>
<td><strong>Utility Air Regulatory Group (UARG)</strong></td>
<td>Member from the 1970’s until 2019, when UARG disbanded in 2019, while under investigation by members of Congress.</td>
<td>Funding: $301,827 in 2017.</td>
<td>Activity: DTE Energy has left the UARG following government investigations into William Wehrum, citing that membership to the group “no longer serves the company's purpose.”</td>
<td></td>
</tr>
<tr>
<td><strong>American Coal Ash Association (ACAA)</strong></td>
<td>Current member</td>
<td></td>
<td>Funding: $589,753 in 2017.*</td>
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<tr>
<td><strong>American Gas Association (AGA)</strong></td>
<td>Jerry Norcia, President and CEO at DTE Energy is on the AGA Board of Directors</td>
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Denial Coalitions

<table>
<thead>
<tr>
<th>Organization</th>
<th>Membership/Leadership</th>
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<tbody>
<tr>
<td>Americans for Clean Coal Electricity (ACCE)</td>
<td>Membership: Detroit Edison a member 2008-2013.</td>
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<tr>
<td></td>
<td>former company president and CEO, has served as CEED Board Director.</td>
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<td></td>
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</tr>
<tr>
<td>American Legislative Exchange Council (ALEC)</td>
<td>Funding: DTE Energy (then Detroit Edison) historically funded ALEC.</td>
</tr>
</tbody>
</table>

*indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying)

Looking Ahead

Rhetorical Framings
DTE has offered limited public comment on climate change. Their website’s “Climate Change” page focuses exclusively on emissions reductions strategies.

Official Commitments
DTE Energy has pledged an 80% reduction in emissions and the retirement of all the company’s coal-fired power plants by 2050. The company plans to close three of its major coal-fired power plants by 2023: the River Rouge Power Plant, the St. Clair Power Plant, and the Trenton Power Plant. DTE Energy has

368 Ibid.
announced a $15 billion dollar plan to make the shift to 40% natural gas, 40% renewables (mostly wind), and 20% nuclear by 2050.\textsuperscript{371}

**Accountability**

DTE Energy’s plan to reduce emissions largely relies on natural gas infrastructure. According to their \textit{2018 10-K SEC Filing}, the company expects to grow its natural gas operations through expanding existing assets (such as pipelines and storage capacity) as well as acquiring and developing new assets with long-term customer commitments.\textsuperscript{372} This expansion includes bringing a new natural gas generation facility and new solar and wind projects online in 2022. These two major pieces of infrastructure are planned to have equal electricity generation capacity, an example that reflects the company’s long-term plan to have equal generation from natural gas and renewables.\textsuperscript{373}

The company’s \textit{2018 10-K} also states that, “A key priority for DTE Energy is to maintain a strong balance sheet which facilitates access to capital markets and reasonably priced short-term and long-term financing.”\textsuperscript{374} This rhetoric is consistent with DTE’s investments in natural gas infrastructure, and its plans to capitalize on growing gas markets in Eastern Canada and Northeastern USA’s \textit{Marcellus} and \textit{Utica} shale gas formations.\textsuperscript{375}

\textsuperscript{371} Ibid.


With a market cap of nearly $23 billion, Entergy is one of the country’s largest publicly held utility companies, serving 2.9 million customers with nearly 30,000 MW of electric generation capacity in Arkansas, Louisiana, Mississippi and Texas and employing more than 13,000 workers.

**Operations**
In 2018, Entergy emitted nearly 41 million metric tons of greenhouse gases accounting for roughly 0.7% of the nation’s total emissions for that year. In 2018, Entergy’s internal electricity generation capacity came from 52% natural gas, 36% nuclear, and 12% coal. Despite only accounting for a fraction of Entergy’s generation, Entergy’s five highest capacity coal-fired plants accounted for roughly 30% of the firm’s total emissions for 2018.

Entergy’s largest coal-fired plants are White Bluff Generating Plant, located in Redfield, Arkansas, and Independence Steam Station, in Newark, Arkansas. Both plants have a generating capacity of 1700 MW, roughly 5.6% of Entergy’s total capacity each. Entergy’s third largest plant is the Roy Nelson Generating Plant, a 615 MW facility owned and operated by Entergy Louisiana and Entergy Texas. All three plants source their coal from the Powder River Basin in Wyoming. Entergy’s primary coal suppliers include Peabody Energy, Arch Coal, and Cloud Peak. All of the Wyoming mines serving Entergy’s power plants transport coal via BNSF railroad company. White Bluff and Independence are set to be retired in 2028 and 2030, respectively.

Entergy also provides natural gas to 200,000 customers in Louisiana and operates significant natural-gas fired power plants like Union Power Station and Union Power Station.

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383 ibid.
Political Activity

Lobbying, Political Contributions, and Recent Activity

Entergy has spent nearly $70 million on lobbying since 1998. In 2007 Entergy worked with Southern Company to lobby against a bill that would have required a federal Renewable Portfolio Standard (RPS), that would have required all utility companies to source 15% of their electricity from renewable sources by 2020. In 2009, Entergy was part of a coalition that supported the Waxman-Markey cap and trade bill.

Entergy opposed the EPA’s 2015 Clean Power Plan which would have decreased emissions from power plants, and ultimately filed a public petition in opposition to the plan. Entergy has also pushed back against net-metering programs in Louisiana that would financially reward solar panel owners for giving excess energy back to the grid.

In 2018, while advocating for a new natural gas-fired power plant in New Orleans, Entergy hired paid actors to advocate on behalf of the plant at New Orleans City Council hearings. The agency hired to implement this plan, Hawthorn Group, has also been implicated in misleading messages created with the American Coalition for Clean Coal Energy (ACCCE). The council ultimately fined Entergy $5 million, in part due to the utility’s refusal to fully cooperate with the independent investigation.

After being accused by the Sierra Club of violating the ‘Clean Air Act’, in 2018 Entergy agreed to shut down three of its highest emitting plants.

Business Associations

| United States Chamber of Commerce (USCC) | Membership: Current member.  
Funding: $87,500 in membership dues in 2015 and $62,500 in 2018. |

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https://www.edf.org/climate/clean-power-plan-case-resources
390 “Solar advocates push back against proposal to gut net metering in Louisiana.” PV Magazine USA.  
https://www.energyandpolicy.org/energy-leaves-questions-unanswered-in-paid-actor-scandal/
392 “In settlement, Entergy Arkansas agrees to shut down coal, natural gas generators.” Arkansas Online.  
393 “The Chamber of Secrets: An Investigation into Who Funds the Notoriously Opaque U.S.Chamber of Commerce.” Chamber of Commerce Watch.  
https://www.entergy.com/userfiles/content/investor_relations/pdfs/2018_Advocacy_and_Political_Contributions_Report.pdf
Activity: Named as a finalist in corporate citizenship award.  

| Edison Electric Institute (EEI) | Membership: Current member.  
|                                | Funding: At least $270,763 in membership dues in 2015 and $277,627 in 2018.  
|                                | Activity: Received EEI emergency assistance work award for 21 consecutive years.  

Denial Coalitions

| American Legislative Exchange Council (ALEC) | Membership: No longer a donor as of 2012.  
|                                             | Funding: Vice-Chairman level sponsor of 2011 annual conference, 2006-2008 Corporate donor to ALEC scholarship fund.  

Looking Ahead

Rhetorical Framings

In Entergy’s March 2019 Climate Scenario Analysis, Entergy stated, “Recognizing the challenges posed by climate change, Entergy Corporation has focused on the issue as a sustainability priority for almost two decades.” In that same report, Entergy signaled support for market mechanisms to combat climate change, stating that, “Optimally, greenhouse gas control mechanisms should be economy-wide and send a stable, predictable price signal.”

Official Commitments

In 2011, Entergy committed to lowering its emissions 20% from 2000 levels by 2020. According to Entergy, at the end of 2018 they were already surpassing that reduction by 8%, achieving 28% reduction. Additionally, the company has committed to a 50% reduction from 2000 levels by 2030.

396 “Entergy Named a 2018 Finalist for the U.S. Chamber Foundation Corporate Citizenship Award.” Entergy Newsroom.  
397 “US Member Company Links.” Edison Electric Institute.  
https://www.eei.org/about/members/uselectriccompanies/Pages/usmembercolinks.aspx  
401 “Six More Corporations Dump ALEC; 38 Companies Have Now Cut Ties with Corporate Bill Mill.” PR Watch.  
402 American Legislative Exchange Council, 2011 Conference Sponsors, conference brochure on file with the Center for Media and Democracy, August 11, 2011  
403 “Buying Influence.” ALEC Exposed.  
https://www.alecexposed.org/w/images/2/2f/BUYING_INFLUENCE.pdf  
404 “Climate Scenario Analysis.” Entergy.  
https://cdn.entergy.com/userfiles/content/environment/docs/EntergyClimateScenarioAnalysis.pdf  
Accountability

To achieve these reductions, Entergy plans to continue investing in natural gas infrastructure and retire existing coal generation assets. The company has committed to retiring 80% of its coal fired capacity by 2030, and plans on replacing that generation largely with solar and natural gas. Entergy plans on adding 4,000 MW (around 13.3% of Entergy’s current capacity) of gas-fired generation and 1000 MW of renewable electricity in the coming years. The company has also considered investing directly into natural gas reserves.

Entergy’s planned renewable generation will primarily come from solar, considering limited wind power resources in the southeastern region in which the company operates. Less than 1% of the utility’s current generation comes from renewable energy, a figure that the company only forecasts to rise past 7% in the most extreme scenario. In contrast, Entergy expects natural gas to account for 60% of generation in nearly all scenarios. Entergy does account for carbon pricing in its future models. Additionally, Entergy notes that further emissions reductions will come from technology that is not yet mature, such as energy storage and carbon capture and sequestration.

The Energy and Policy Institute reports that Entergy’s March 2019 emissions reduction goal (28% by 2030 from a 2000 baseline) was set after the company had already achieved that level of emissions two years prior, in 2017. Entergy also openly acknowledged in its sustainability report that its goal is not consistent with a 2-degree pathway.

https://www.entergy.com/environment/
406 “Climate Scenario Analysis.” Entergy.
https://cdn.entergy.com/userfiles/content/environment/docs/EntergyClimateScenarioAnalysis.pdf
https://www.snl.com/InteractiveX/Article.aspx?cdid=A-32370190-12342&mkt_tok=3RkMjWWfT9wsRojub7Pcc%2FhmjTEU5z17%2BswtWq%2B%2BhIzk2EFye%2BLIHETpodeMT8BkPbvYDBccEhagyQsPr3FIJANysRuRdhCw%3D%3D
409 Ibid.
410 Ibid.
411 “Climate Scenario Analysis.” Entergy.
https://cdn.entergy.com/userfiles/content/environment/docs/EntergyClimateScenarioAnalysis.pdf
Consumers Energy

Headquartered in Jackson, MI, Consumers Energy is the largest utility in Michigan. The company provides electric service to 1.8 million customers in Michigan’s Lower Peninsula, and natural gas service to nearly 1.8 million in 54 Lower Peninsula counties across 13,000 square miles of service territory. Consumers Energy is the principal subsidiary of CMS Energy, both of which are led by CEO Patricia Poppe.

**Operations**

**Electricity**

The majority of Consumers’ electricity generation capacity comes from steam-electric plants (coal or natural gas/oil), though their system generating capacity also includes natural gas/oil turbine units, wind/solar, and hydroelectric. Consumers has five remaining coal-fired units: Their higher capacity plant, Karn Generating Plant has two coal-fired units and is the 8th highest-emitting power plant in Michigan, emitting about 2.7 million metric tons of CO₂-eq in 2018. Consumers’ other highest capacity plant, J.H. Campbell Generating Plant, runs partially on coal and partially on natural gas/oil and is the country’s 47th highest-emitting power plant with 7.7 million metric tons of CO₂-eq reported emissions in 2018. Consumers’ other largest plants are Zeeland and Jackson, both natural gas/oil plants.

Karn and Campbell source their coal from Wyoming’s Powder River Basin. Companies operating these Wyoming mines include coal giants including Arch Coal, Venture Coal, and Cloud Peak. All three of the Wyoming mines serving the Consumers Energy power plants transport coal via BNSF railroad company.

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414 Ibid.

415 Ibid.


Campbell sources petroleum from Brenner Oil, an independent fuel supplier based in the Great Lakes Region. Karn’s petroleum is supplied by Petroleum Traders, a corporation based out of Indiana with one of the largest fuel distribution networks in the United States. Zeeland and Jackson receive their natural gas from Tenaska, a natural gas marketing company.

**Natural Gas Infrastructure**

Consumers is one of the largest natural gas distribution companies in the United States, providing natural gas service to 4.1 million customers in 45 counties in Michigan. The company has almost 2,500 miles of transmission pipeline and over 27,000 miles of distribution pipeline, as well as 15 underground gas storage fields in Michigan. In 2015, Consumers delivered 356 billion cubic feet of natural gas to their customers.

Consumers sources 15% of their natural gas from Michigan, purchasing 25% from Canada and 60% from the Gulf Coast, Texas, Louisiana, Kansas, and Oklahoma.

**Political Activity**

**Lobbying, Political Contributions, and Recent Activity**

Open Secrets reports that CMS Energy, the parent company of Consumers Energy, spent over $23 million on lobbying from 1998 through 2018. Consumers Energy alone has spent tens of millions of dollars on lobbying and political contributions just since 2014, including $43.5 million through the 501(c)4 organization Citizens for Energizing Michigan’s Economy (CEME). Michigan State Senator Kevin Daley has criticized the campaign finance laws that allowed Consumers Energy and DTE to contribute such large amounts to his campaign through CEME. During the years 2014-2016, Consumers contributed $23.5 million to CEME; over the same time frame, CEME reported only $8.5 million in revenue. In addition to campaign contributions, CEME contributes to the Michigan Chamber of Commerce and the Electric

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427 Ibid.
430 Ibid.
432 Ibid.
Markets Research Foundation, a D.C.-based electric utilities front group whose Board Chairman is a lobbyist for Southern Company and Berkshire Hathaway.433

In 2012, CMS Energy partnered with DTE Energy, another Michigan-based utility company, to defeat a ballot measure that would have required utility companies to source 25% of their electricity from renewables; CMS Energy contributed $12,218,429 to defeat this ballot measure.434

Consumers Energy Political Spending

<table>
<thead>
<tr>
<th></th>
<th>Funding of Citizens for Energizing Michigan's Economy</th>
<th>Federal Government Lobbying</th>
<th>Michigan Lobbying Expenses (including food and beverage)</th>
<th>PAC Contributions to Michigan Candidates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>$43,513,750</td>
<td>$4,851,000</td>
<td>$990,878</td>
<td>$781,450</td>
</tr>
<tr>
<td>2017</td>
<td>$20,000,000</td>
<td>$1,100,000</td>
<td>$225,651</td>
<td>$207,625</td>
</tr>
<tr>
<td>2016</td>
<td>$15,000,000</td>
<td>$1,330,000</td>
<td>$230,820</td>
<td>$187,750</td>
</tr>
<tr>
<td>2015</td>
<td>$1,513,750</td>
<td>$1,280,000</td>
<td>$311,118</td>
<td>$178,200</td>
</tr>
<tr>
<td>2014</td>
<td>$7,000,000</td>
<td>$1,141,000</td>
<td>$223,290</td>
<td>$207,875</td>
</tr>
</tbody>
</table>

(Sources: MPSC filings; Michigan Secretary of State's lobbying financial reports and campaign finance database; Center for Responsive Politics)

Business Associations

**Edison Electric Institute (EEI)**

**Membership:** Both Consumers Energy and its parent company CMS Energy are members of EEI.435

**Funding:** Open Secrets reports Consumers and/or CMS funding to EEI in every spending cycle since 2006.436 Without specifying the year, Consumers Energy’s 2019 website reports paying $902,994 in membership dues to EEI, of which $241,642 is used for political purposes.437


**American Gas Association**

**Membership:** Current membership.\(^{438}\)

**Funding:** Without specifying the year, Consumers Energy’s 2019 website reports paying $509,511 in membership dues, of which $24,478 is used for political purposes.\(^{439}\)

**Utility Air Regulatory Group (UARG)**

**Membership:** Member until UARG disbanded in 2019, while under investigation by members of Congress.\(^{440}\)

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**Denial Coalitions**

**Global Climate Coalition (GCC)**

**Membership:** At least 1989, 1993, 1996-1998.\(^{441}\)

**Americans for Clean Coal Electricity (ACCCE)**

**Membership:** 2008-2015.\(^{442}\)

**American Legislative Exchange Council (ALEC)**

**Funding:** 2006-2008 contributions to ALEC’s corporate-funded trips for lawmakers.\(^{443}\)

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**Looking Ahead**

**Rhetorical Framings**

Patricia Poppe, CEO of CMS Energy and Consumers Energy, has stated the importance of both clean energy generation and reduced energy demand in the face of climate change. As part of their campaign to reduce energy use among their customers, Poppe said at a public event in 2019, “I cannot stress firmly enough that we are in a crisis and must take action right now. We can’t do this ourselves, we need your help.” She also said, “Not too many companies come up and say, ‘please, use less of my product.’ But this is our commitment to Michigan.”\(^{444}\)

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443 “Buying Influence: How the American Legislative Exchange Council Uses Corporate-Funded ‘Scholarships’ to Send Lawmakers on Trips with Corporate Lobbyists.” ALECexposed.org. The Center for Media and Democracy. 2013. [https://www.alecexposed.org/w/images/2/2f/BUYING_INFLUENCE.pdf](https://www.alecexposed.org/w/images/2/2f/BUYING_INFLUENCE.pdf)

Official Commitments

Consumers’ “goal” is an 80% reduction in greenhouse gas emissions “across the entire business, so both electric and gas,” by 2040.445

Electricity

Consumers’ Clean Energy Plan outlines their goal of generating 90% of their energy from “clean sources” (i.e. renewables, energy storage, and customer efficiency programs) by 2040. To reach this goal, Consumers has proposed “no new fossil fuel investments,”446 instead planning additional wind and solar generation, long-term power purchase agreements for renewables, and a program to improve customer energy efficiency by 2% per year.447 448 Consumers are also looking into “creative solutions” such as battery storage, demand response, and programs to increase energy efficiency.449 Consumers plans to transition to zero coal, retiring all five of their remaining coal-fired power plants by 2040: Karn 1 and Karn 2 in 2023, Campbell 1 and Campbell 2 in 2031, and Campbell 3 by 2040.450 The company aims to generate electricity using 42% renewable energy by 2030 and 56% by 2040.451 They have also pledged to plant one tree for every customer who clicks “Join the Movement” on their website.452

Natural Gas

In addition to decreasing emissions from electricity generation, Consumers recently pledged net-zero methane emissions from its natural gas delivery systems by 2030.453 They plan to reduce methane leaks 80% from 2011 levels, offsetting the last 20% with renewable natural gas purchases.454

Accountability

Electricity

Consumers Energy retired seven coal-fired power plants in 2016, and has equipped their five remaining coal-fired power plants with technology to reduce emissions.455 The company has increased the proportion

445 Brandon Hofmeister, telephone conversation with author, November 15, 2019.
446 Brandon Hofmeister, telephone conversation with author, November 15, 2019.
449 Ibid.
450 Ibid.
451 Ibid.
454 Ibid.
of its electricity generation powered by renewables from 2% of their energy mix in 2005 to 11% in 2019, and decreased its coal generation from 70% in 2005 to 20% in 2019.\textsuperscript{456}

Consumers Energy plans to decrease natural-gas fired generation from 31\% of their electric capacity in 2019 to 14\% in 2030 and 10\% in 2040, an ambitious goal compared to most other companies profiled in this report.\textsuperscript{457} The Michigan Public Service Commission approved Consumers’ Clean Power Plan in June 2019;\textsuperscript{458} Consumers plans “no new fossil fuel investments” going forward.\textsuperscript{459}

\textbf{Natural Gas}

Consumers Energy has participated in the EPA’s Natural Gas STAR Program since 1996 and was a founding member of the 2016 Natural Gas STAR Methane Challenge Program.\textsuperscript{460} The company plans to invest approximately $1 billion “over the next couple of years alone” on their natural gas infrastructure.\textsuperscript{461} Their Enhanced Infrastructure Replacement Program (EIRP), which began in 2012, is a 25-year, $2 billion program to replace 2,600 miles of natural gas pipelines in 60 projects across 17 counties.\textsuperscript{462} While much of this investment improves pre-existing natural gas infrastructure to minimize methane emissions, Consumers’ \texttt{natural gas pipeline projects} also include “expanding and upgrading service” to accommodate “more than 10,000 expected new residential customers.”\textsuperscript{463}

Spending on upgrading infrastructure to prevent leaks can help limit methane emitted during storage and distribution of natural gas; however, at the same time such investment in natural gas infrastructure may make it difficult to move away from using the fossil fuel in the future. While experts have lauded Consumers’ pledge to reduce methane emissions because “emissions abatement anywhere is a helpful thing for climate,” they also acknowledge that Consumers “account[s] for a relatively small amount of the problem;” storage and distribution account for less than 20\% of methane emissions along the entire oil and gas supply chain, with most methane emitted before the gas is transmitted.\textsuperscript{464}

Along with DTE Energy and the Koch-funded \texttt{Americans for Prosperity}, Consumers opposed a 2012 Michigan ballot measure to increase Renewable Energy Standards in the state. More recently in 2017,
Consumers was criticized for delaying renewable energy projects that are part of the Public Utilities Regulatory Act of 1978 (PURPA). Consumers is one of the largest donors to the sponsor of a bill to gut PURPA, which would in turn likely stall the growth of renewable energy.

That noted, Consumers’ demonstrated commitment to reducing emissions in the face of climate change still far surpasses that of other comparable utility companies.

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466 Ibid.
Xcel Energy is a $30 billion public utility company based in Minneapolis, Minnesota. It is composed of four wholly-owned subsidiaries: Northern States Power Company-Minnesota, Northern States Power Company-Wisconsin, Public Service Company of Colorado and Southwestern Public Service Company. Through these subsidiaries, Xcel serves 3.5 million electricity customers and 1.9 million natural gas customers in Colorado, Michigan, Minnesota, New Mexico, North Dakota, South Dakota, Texas, and Wisconsin. Xcel is the first major utility in the United States to commit to going carbon neutral, pledging 100% carbon-free power by 2050.

Operations
Xcel Energy operates 72 power plants. Nine out of the 72 are coal-fired, including two of their top three highest capacity plants, and twenty-two plants are fueled by natural gas. In 2018, Xcel’s energy portfolio was comprised of 33% coal, 29% natural gas, 13% nuclear, 19% wind, 2% solar, and 4% other renewables.

Xcel’s largest capacity plant, Sherburne County Generating Plant (Sherco) in Becker, MN is the 12th highest emitting power plant in the United States and the largest coal-fired power plant in the upper midwest. Comanche Generating Station is Xcel’s next largest plant, the largest in Colorado and 34th highest emitting in the US. The next largest plant is Prairie Island Nuclear Generating Station in Red Wing, Minnesota.467

Sherco and Comanche both source their coal from mines in the Powder River Basin in Wyoming and Montana. Companies operating these mines include coal giants such as Arch Coal, Peabody Energy, and Westmoreland Resources. All four of the mines serving the Sherco and Comanche operate through BNSF railroad company.468

Xcel also operates over 36,000 miles of natural gas pipelines; 34,000 miles for distribution and just over 2,000 for transmission. As a local distribution company (LDC), Xcel purchases and transports natural gas from third party providers to consumers.469 The natural gas that Xcel distributes is mainly sourced from four supply basins: Rocky Mountain Basin (Colorado, Montana, and Wyoming), Anadarko Arkoma Basin (Texas, Oklahoma, and Kansas), Western Canada Sedimentary Basin (Alberta and Saskatchewan, Canada),

and the Permian Basin (Texas and New Mexico). The company’s distribution system is directly connected to interstate pipelines, including Trailblazer Pipeline and Southern Star Pipeline.

**Political Activity**

**Lobbying, Political Contributions, and Recent Activity**

According to Open Secrets, Xcel Energy spent about $34.3 million on lobbying from 1998 to 2018. The highest spending year was 2004, in which Xcel spent $2.5 million; in 2018, they spent $1.68 million. Xcel’s own Political Contributions Report documents even higher spending on lobbying, stating that the company spent a total of approximately $3.1 million on federal and state lobbying in 2014, $3.16 million in 2015, $3.28 million in 2016, and almost $5 million in 2017.

Their Political Contributions Report also discloses that Xcel has 6 state PACs and 1 federal PAC. According to the report, in 2017, Xcel donated $100,000 each to both the Democratic Governors Association and the Republican Governors Association, and $25,000 each to the Democratic Legislative Campaign Committee and the Republican Legislative Campaign Committee. The report also states that Xcel contributed $25,000 to the Presidential Inaugural Committee for Donald Trump’s 2017 presidential inauguration.

**Business Associations**

<table>
<thead>
<tr>
<th>Association</th>
<th>Membership</th>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Edison Electric Institute</td>
<td>Current member</td>
<td>$259,710* in 2016</td>
</tr>
<tr>
<td>Western Fuels Association</td>
<td>Now retired, Duane Richards spent nearly 20 years at Xcel Energy and one of its predecessors before joining WFA as CEO and General Manager from 2004-2015</td>
<td></td>
</tr>
<tr>
<td>American Gas Association</td>
<td>Current member</td>
<td>$23,744* in 2016</td>
</tr>
</tbody>
</table>

Activity: Xcel hosted a joint AGA/EEI meeting and symposium at their Minneapolis office in October 2019. Xcel also presented on “Leading the Energy Future” at the AGA Financial Forum in May 2018.

*indicates funding listed as portion of dues not deductible under section 162(e) of the Internal Revenue Code (e.g., for lobbying)

### Denial Coalitions

| **Center for Energy and Economic Development (CEED)** | **Membership:** 2004-2005.  
**Leadership:** Xcel is listed in CEED’s archived directory of “Board Members.” |
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<tr>
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</thead>
<tbody>
<tr>
<td><strong>Alliance for Energy &amp; Economic Growth (AEEG)</strong></td>
<td><strong>Membership:</strong> 2001-2010.</td>
</tr>
</tbody>
</table>
| **American Legislative Exchange Council (ALEC)** | **Membership:** Terminated membership in 2011.  
**Leadership:** Xcel Energy was ALEC’s corporate state co-chair in Wisconsin as recently as 2011.  
**Funding:** 2006-2008 contributions to ALEC’s corporate-funded trips for lawmakers. According to a spokesperson, Xcel has not given money to ALEC since 2010. |
Looking Ahead

Rhetorical Framings

Xcel’s website states, “We know that climate change is an urgent issue for many of our policy makers and investors and is a growing concern of our customers who want to help make a difference. It is a priority for us as well, and is the reason we were the first major energy company in the nation to announce a vision to serve customers with 100% carbon-free electricity.”

At the Bloomberg Energy Finance Summit in New York in 2019, Xcel’s President, Chairman, and CEO Ben Fowkes affirmed Xcel’s commitment to a renewable energy transition, stating, “Every technology has its advantages and disadvantages. We’ve got to be open to anything that mitigates the risk of climate change.”

Official Commitments

Xcel’s “bold vision” is to transition to 100% carbon-free electricity by 2050. To that end, they are currently implementing plans to reduce carbon emissions 60% from 2005 levels by 2030, and are working on plans to increase that reduction to 80%. These plans, informed by UN IPCC reports and the goal of keeping warming below 2 degrees Celsius, involve early retirement of coal-fired power plants in favor of expanding and/or extending the life of wind, solar, nuclear, and natural gas plants, as well as battery storage. Xcel is currently implementing plans to retire 23 coal units between 2005 and 2027, reducing their coal-fueled energy generation capacity by approximately 50%. By 2027, Xcel plans for an energy mix comprised of 48% renewables, 21% gas, 19% coal, and 12% nuclear.

Accountability

In 2018, Xcel reduced carbon emissions from electricity that serves customers by 38% below 2005 levels. Xcel also completed its Rush Creek wind project in 2018. The company also currently offers renewable initiatives for its customers.

Despite its vision of carbon-free energy by 2050, Xcel continues to invest in natural gas infrastructure, from replacing and installing pipelines to building a new compressor station. Their 2050 goals also rely on technology that is not yet commercially available, as well as energy efficiency programs for consumers. That noted, Xcel’s demonstrated commitment to reducing emissions in the face of climate change still far surpasses that of other comparable utility companies.

2005
Xcel Energy becomes one of the first power suppliers to register with The Climate Registry to track and verify emissions.

- 21% Carbon Free

2017
We are leading the clean energy transition, and so far, have reduced carbon emissions 35% from 2005 levels.

- 40% Carbon Free

2027
We are now on track to achieve 60% carbon-free electricity by 2027

- 61% Carbon Free