



Memorandum from the Office of the Inspector General

October 6, 2022

Kris G. Edmondson
Timothy D. Jackson

**REQUEST FOR FINAL ACTION – EVALUATION 2022-17355 – ORGANIZATIONAL
EFFECTIVENESS – KINGSTON FOSSIL PLANT**

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Noel K. Kawado, Senior Auditor, at (865) 633-7348 or Lisa H. Hammer, Director, Evaluations – Organizational Effectiveness, at (865) 633-7342. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)

NKK:KDS
Attachment

cc (Attachment):

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OIG File No. 2022-17355



Office of the Inspector General

Evaluation Report

To the Vice President, Power
Operations, Coal, and to the
Plant Manager, Kingston Fossil
Plant

ORGANIZATIONAL EFFECTIVENESS – KINGSTON FOSSIL PLANT

Evaluation Team
Noel K. Kawado
Justin B. Franklin
Jessica L. Monroe

Evaluation 2022-17355
October 6, 2022

ABBREVIATIONS

AUO	Assistant Unit Operator
EIS	Environmental Impact Statement
HR	Human Resources
FY	Fiscal Year
KIF	Kingston Fossil Plant
PM	Preventative Maintenance
PO	Power Operations
TVA	Tennessee Valley Authority
UO	Unit Operator

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Evaluation 2022-17355 – Organizational Effectiveness – Kingston Fossil Plant

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. Plant closures and potential plant closures pose unique organizational effectiveness risks, such as operational challenges due to aging assets and the instability of the workforce due to the proposed closure. This evaluation focuses on Kingston Fossil Plant (KIF), one of five remaining fossil plants within the Tennessee Valley Authority's (TVA) coal fleet. Current planning assumptions have all nine of KIF units retiring during 2027. However, KIF's closure is contingent upon approval by TVA's Board of Directors and completion of environmental reviews pursuant to the National Environmental Policy Act, which includes an evaluation of replacement options with other generation. The objective of this evaluation was to identify factors that could impact KIF's organizational effectiveness.

What the OIG Found

During our evaluation, plant personnel informed us that interactions with management and between coworkers were generally positive, although behavioral concerns regarding one individual was identified. In addition, plant personnel expressed concerns regarding (1) condition of assets, (2) staffing challenges, and (3) communication related to the future of KIF.

What the OIG Recommends

We recommend the Plant Manager, KIF, and Vice President, Power Operations, Coal, (1) evaluate the risks resulting from degraded asset condition and mitigate the risks as necessary; (2) determine if further actions could be taken to alleviate staffing concerns at KIF, including risks related to contractor knowledge and overtime, and implement as necessary; and (3) address communication concerns related to KIF's future. In addition, we recommend the Plant Manager, KIF, work with Human Resources to address identified behavior issues with one individual.

TVA Management's Comments

TVA management described actions taken and planned to address our recommendations. In addition, TVA management informally provided minor wording changes, which were incorporated in the report as appropriate. See Appendix B for TVA management's complete response.

Auditor's Response

We agree with TVA management's actions taken and planned.

BACKGROUND

This evaluation focuses on Kingston Fossil Plant (KIF) located on the Clinch River arm of Watts Bar Reservoir near Kingston, Tennessee. KIF is one of five remaining fossil plants within the Tennessee Valley Authority's (TVA) coal fleet and the nine-unit, coal-fired steam generating plant has a summer net capability of 1,398 megawatts. KIF's mission is to be dispatchable to serve load. It plays an important voltage support role in the area.

TVA's *2019 Integrated Resource Plan* acknowledged the potential for higher operation, maintenance, and environmental costs of continued operation of TVA's aging coal fleet and included a recommendation to conduct end-of-life evaluations during the term of the Integrated Resource Plan to determine whether retirements greater than 2,200 megawatts would be cost-effective. According to TVA, these evaluations confirmed that the aging coal fleet is experiencing deterioration of material condition and performance challenges, which are expected to increase because of the coal fleet's advancing age, the difficulty to adapt within the changing generation profile, and the coal fleet's contribution to environmental, economic, and reliability risks. As of July 2022, TVA was in the process of preparing an environmental impact statement (EIS) on the proposed retirement and demolition of KIF and the construction and operation of facilities to replace it. In the *Kingston Fossil Plant Retirement EIS Scoping Report*, TVA stated alternatives to be studied as part of the EIS are one piece of the overall asset strategy. This strategy included, among other things, retiring aging coal units as they reach the end of their useful life (expected by 2035) and using natural gas to enable needed coal retirements and solar expansion as other technologies develop. TVA stated it expects the scope of the EIS will include various alternatives in addition to the no-action alternative of continuing to operate KIF with needed upgrades to meet regulatory requirements. TVA plans to consider three action alternatives in the EIS:

- Retirement of KIF and construction and operation of a combined cycle combustion turbine gas plant paired with a dual-fuel simple cycle combustion turbine gas plant at the same site;
- Retirement of KIF, investment in local and regional transmission, and construction and operation of two simple cycle gas plants at alternate locations; or
- Retirement of KIF and construction and operation of solar and storage facilities primarily at alternate locations.

TVA's proposed timeline indicates the development and publishing of the draft EIS would be completed in late 2022. KIF's closure is contingent upon approval by TVA's Board of Directors and completion of the environmental reviews pursuant to the National Environmental Policy Act. Current planning assumptions has all nine of KIF units retiring during 2027.

In 2020, the Senior Vice President of Power Operations (PO) formed a team to develop a long-term workforce strategy for retiring TVA coal facilities and better addressing the needs of fossil plant employees displaced by plant closures. This long-term workforce strategy was rolled out to coal sites beginning in October 2021, and included 5-year staffing, training, and site closure support plans. According to PO management, KIF's 5-year site closure support plan will be created when KIF is within 5 years of the proposed 2027 retirement date.

As of February 28, 2022, KIF consisted of 159 full-time personnel, including 140 employees, 15 supervisors, 2 department managers, 1 assistant department manager, and a plant manager. In addition, as of February 28, 2022, based on information from TVA's Human Resources (HR) People Lifecycle Unified System (PLUS)¹ system, KIF had 359 contractors,² including 19 individuals working in operational roles.

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. Plant closures and potential plant closures pose unique organizational effectiveness risks, such as operational challenges due to aging assets and the instability of the workforce due to the proposed closure. This is the OIG's second organizational effectiveness evaluation of KIF. We previously completed an organizational effectiveness evaluation in March 2016,³ which identified concerns related to (1) lack of trust between plant management and employees, (2) work management, (3) ammonia operations staffing, (4) training, (5) inventory, and (6) negative impacts of corporate decisions, including staffing levels and management selections. Due to potential changes in the status of KIF since our previous evaluation, we scheduled a follow-up organizational effectiveness evaluation at KIF.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to identify factors that could impact KIF's organizational effectiveness. We assessed operations as of June 2022 and culture at the time of our interviews with KIF personnel, which occurred between February 28, 2022, and March 21, 2022. To complete the evaluation, we:

- Reviewed documentation to obtain an understanding of TVA's coal operations strategy, challenges, initiatives, and actions as of February 2022, and other documentation to gain an understanding of risks and initiatives related to KIF's potential closure.
- Reviewed PO's long-term workforce strategy to gain an understanding of how PO was addressing the needs of displaced employees.

¹ PLUS is an application that includes TVA personnel data.

² According to the plant manager, the number of contractors reflected in HR PLUS may not be the actual number of contractors working at KIF on a specific day.

³ Evaluation 2015-15329, *Kingston Fossil Plant Organizational Effectiveness*, March 10, 2016.

- Conducted interviews with 148 TVA personnel,⁴ including management, and analyzed the results to identify themes that could affect organizational effectiveness.
- Conducted interviews with 30 contractors who provided ongoing support to KIF at the time of our interviews.
- Conducted interviews with staff who support KIF in areas related to engineering, safety, and environmental.
- Reviewed staffing data for KIF from September 30, 2018, through May 31, 2022, to determine trends in staffing by certain job titles.
- Obtained the KIF work order backlog list from Maximo⁵ as of June 27, 2022, to identify the types of asset and equipment issues and the length of time those issues have been outstanding.
- Reviewed work orders from Maximo to obtain detailed information on specific equipment and asset issues.
- Reviewed TVA values and competencies (see Appendix A) for an understanding of cultural factors deemed important to TVA.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

OBSERVATIONS

During our evaluation, plant personnel informed us that interactions with management and between coworkers were generally positive, although behavioral concerns regarding one individual was identified. In addition, plant personnel expressed concerns regarding (1) condition of assets, (2) staffing challenges, and (3) communication related to the future of KIF.

Interactions with Management and Between Employees

About 92 percent of annual employees (employees and managers) and contractors provided positive comments about their interactions with plant management, including supervisors, managers, and/or the plant manager. Positive comments included management was supportive, knowledgeable, and trusting of employees. Many individuals also commented positively on interactions with others in their group and indicated they trusted their coworkers to do their jobs well. However, some individuals expressed concerns regarding behavioral issues with one individual. We communicated the details of this issue to KIF plant management.

⁴ We did not interview 11 individuals either because they (1) were on a leave of absence, (2) had recently retired, (3) had only been at KIF for a short period-of-time, (4) transferred to another TVA location, or (5) did not respond to our attempts for interview.

⁵ Maximo is TVA's Enterprise Asset Management system.

Concerns Related to Asset Condition

Approximately 26 percent of annual employees and contractors expressed concerns related to the current state of assets, including malfunctioning equipment or asset conditions that presented reliability and/or safety risks. Examples included the condition of sump pumps, sluicing system, coal belts/scrapers, boiler-related equipment, and condenser tubes. Eleven of these individuals also indicated that asset issues are brought up but are either not addressed, postponed, or addressed through workarounds. Multiple individuals indicated it can be difficult to get the asset concerns addressed due to KIF Maintenance being short-staffed.

Due to these concerns, we obtained the KIF work order backlog⁶ as of June 27, 2022, and noted a total of 2,349 work orders were outstanding. Thirty-seven of these work orders were assigned a priority rating of 2, and 1,860 of the work orders were assigned a priority rating of 3, which designates the timeframe for scheduling work.⁷ All of the issues associated with the priority 2 work orders were identified during May and June 2022, and most of these work orders had been assigned a scheduled start date. However, the priority 3 work orders had issue identification dates going back to fiscal year (FY) 2012. Only about one third of those work orders had an assigned schedule date. Our review of the work order backlog identified multiple work orders related to sluicing systems, boilers, sump pumps, coal belts, and coal belt scrapers, which were assets brought up as concerns during our interviews. One of the open work orders, which was initiated in December 2019, described serious issues with the Unit 2 boiler pressure. The work order originator indicated this was the third time they had witnessed or heard of this issue, and it had the potential to be a loss of boiler event.

As shown in Chart 1 on the following page,⁸ since January 2021 KIF's work order backlog has trended upward, while the number of backlog work orders closed have remained relatively constant.

⁶ According to Engineering Guideline Document 09.022, *Maintenance Basis*, the work order backlog is defined as all assigned work orders that include corrective, preventative (PM), condition directed, and proactive maintenance activities, as well as all due PMs, and all overdue PMs.

⁷ A priority rating of 2 means "schedule at the earliest opportunity," while a rating of 3 is defined as "schedule at next available system week."

⁸ This information was based on the Work Management Dashboard, which was provided by KIF plant management.

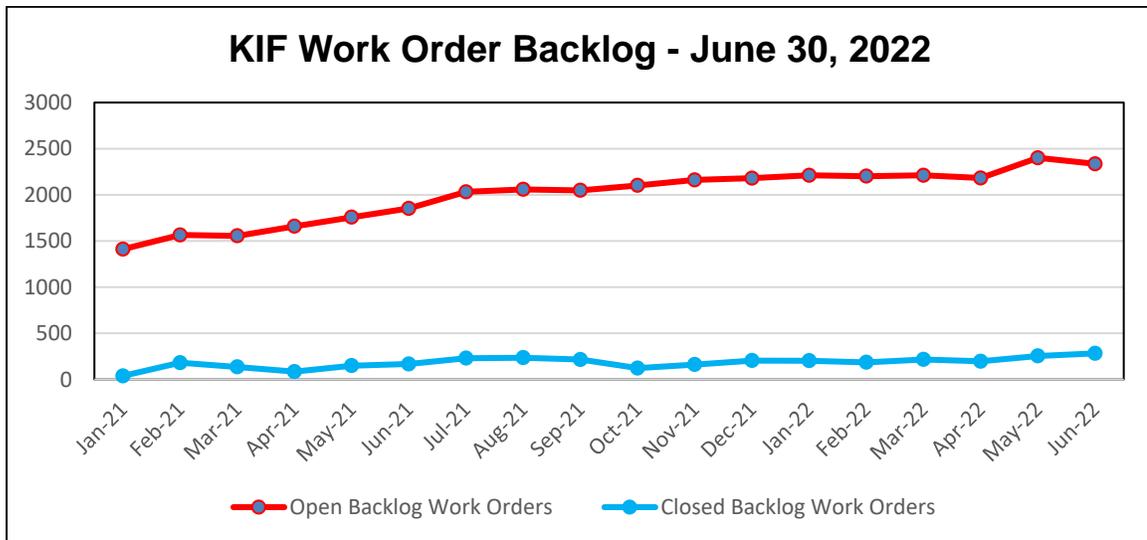


Chart 1

Some individuals expressed issues about Maintenance, Operations, and/or management having different priorities or the perceptions that work being completed by one department was not considered important by the other department. In addition, some individuals expressed concerns with the Work Week⁹ process, including issues with how the work is planned, scheduled, or prioritized or with not having materials or supplies ready for jobs. A few individuals also indicated there can be conflicts between groups or inefficiencies in the workflow, which could be driven, in part, by these prioritization and coordination issues. These issues, in our opinion, could cause delays in the work and exacerbate asset and equipment concerns.

Several individuals attributed the asset concerns to budgetary issues, including comments that funding has decreased for the plant; or that more money was needed to maintain the condition of assets. In particular, some individuals mentioned that significant funding had been cut from an outage, which a few individuals worried would result in the neglect of assets needing attention. We discussed the budgetary concerns with the KIF plant manager, and he provided documentation of recent additions to KIF's Planned Outage Budget. Specifically, in July 2022 an additional \$1.5 million in funding was allocated to KIF's FY 2023 Planned Outage budget to address unfunded high-risk work scope. The documentation showed that this increase brought KIF's total Planned Outage budget for FY 2023 to approximately \$14.8 million. In addition, actions have been or are being taken to remediate certain assets, including a sump pump, sluicing system, coal belts at BC-17 and BC-18, and condenser tubing at Unit 7. According to the KIF plant manager, inoperable sump pumps and sluice systems are addressed upon discovery through various actions. In addition, the KIF plant manager stated that they are in the process of cleaning up the work order

⁹ According to the plant manager, Work Week is the process whereby necessary work to keep the plant operational is identified, dispositioned, and implemented.

backlog, which he indicated has work orders that have been completed but not marked as such.

Staffing Challenges

Approximately 33 percent of annual employees indicated that manpower is lacking in both Maintenance and Operations departments. Some individuals indicated that KIF is losing staff because employees are leaving in anticipation of KIF's closure, or that personnel have not been replaced.

Within Operations, 45 percent of its annual employees indicated a need for more staffing, with some individuals indicating a need for more unit operators (UO). According to TVA Human Resources' data, from September 30, 2018, to May 31, 2022, the total number of UOs decreased by 19, or approximately 35 percent. Although TVA has brought in contractors to assist with the work in Operations, issues related to their lack of TVA and/or KIF knowledge were expressed by other Operations personnel. In addition, some individuals in Operations voiced concerns about working excessive amounts of overtime, which could be driven by the lack of staffing and contractor knowledge concerns.

- Concerns With Contractor Knowledge – While the total assistant unit operator (AUO) headcount increased by one during this period, the percentage of contractors making up the AUO headcount increased from approximately 5 percent as of September 30, 2018, to 29 percent, as of May 31, 2022. Although some individuals indicated that they otherwise have positive interactions with contractors, several individuals in Operations indicated that contractors may not have adequate knowledge, including KIF or TVA knowledge and experience. Specifically, some individuals commented on having to train or provide supervision of contractors, which takes time away from their own responsibilities. In addition, multiple individuals expressed trust concerns with contractors' ability to do their jobs well. For example, some individuals expressed safety and/or reliability concerns with contractors due to their lack of knowledge and experience. Based on our review of Human Resources information as of May 31, 2022, 5 of 11 contractor AUOs had no prior TVA or KIF experience, and 3 of the 11 AUOs previously worked at TVA, but had no KIF experience.
- Concerns About Overtime – About 25 percent of annual employees in Operations expressed their concerns about working significant amounts of overtime or forced overtime, with some attributing the overtime to staffing shortages. A few individuals also indicated having to work multiple shifts consecutively without a day off in between. This is consistent with information in the December 16, 2021, PO presentation *Coal Operations: Assistant Unit Operator / Unit Operator Staffing Projections and Recommendations*, which indicated that the shortfalls in AUO and UO staffing would be offset with current AUOs working overtime and UOs working "significant overtime." In addition, while the presentation stated that the AUO and UO staffing shortages increased safety risks, there was no information about how risks associated with working significant overtime would be mitigated. Multiple

individuals were concerned about the fatigue and safety risks that can result when working large amounts of overtime. As shown in Chart 2 below, average overtime per Operations' employee (total overtime hours divided by headcount) increased by over 180 hours from FY 2020 to FY 2021. Through June 30, 2022, the average overtime per Operations' employee was 420.5 hours.

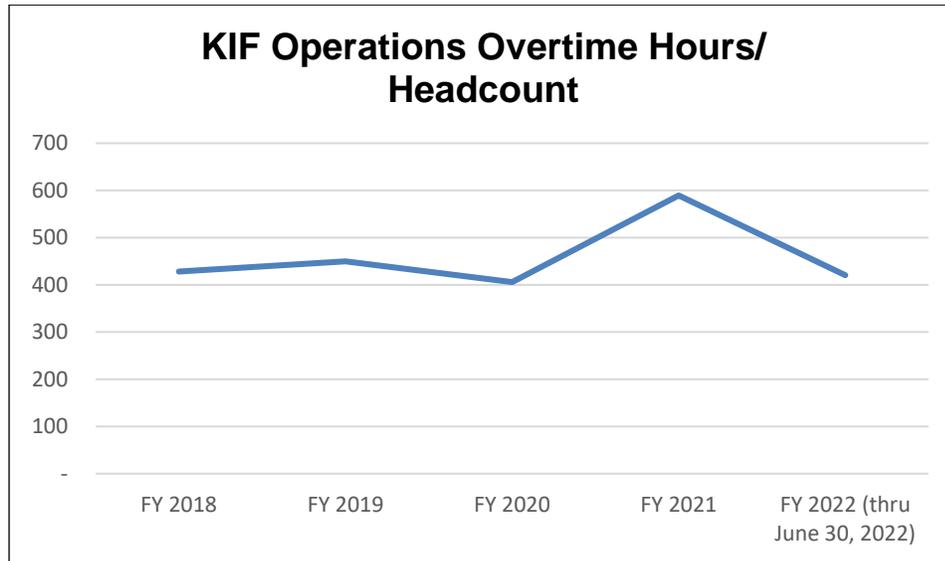


Chart 2

In September 2020, our office issued a report related to TVA's management of overtime at coal plants.¹⁰ In that evaluation, we determined that significant overtime had been worked at all coal plants during FYs 2018 and 2019, potentially due to inadequate staffing and lack of a policy limiting overtime. TVA management declined to implement our recommendations related to placing a cap on hours worked and instituting a fatigue threshold, but stated every possible effort would be made to avoid overtime. However, as previously discussed, multiple individuals interviewed in the current evaluation continued to express concerns about working large amounts of overtime and the related safety risks.

Staffing has also decreased in the Maintenance department. Specifically, between September 30, 2018, and May 31, 2022, total employee staffing in this department decreased by approximately 27 percent, with most of the staffing losses taking place in the Boilermaker, Steamfitter, and Machinist positions. As previously discussed, some individuals expressed concerns that it can be difficult to get support from Maintenance to fix equipment due to staff shortages in that department. In addition, similar to concerns expressed by certain Operations personnel, several interviewees in Maintenance indicated contractors in their department have a lack of knowledge, including TVA and/or KIF knowledge.

¹⁰ Evaluation 2019-15686, *Coal Plant Overtime*, issued September 24, 2020.

In an effort to alleviate staffing concerns, management executed a memorandum of understanding with the International Brotherhood of Electrical Workers to allow staff augmented contractors that did not go through TVA's operator training program, but who have prior external coal plant experience, to serve as AUOs. As previously discussed, several KIF personnel expressed concerns about contractors not having adequate knowledge, including KIF/TVA knowledge and experience, to effectively perform the work, which required more experienced personnel to provide supervision and on-the-job training. Some individuals indicated this takes away time from experienced personnel in completing their own tasks.

Discussions with the KIF plant manager in July 2022 indicated that actions have taken place since our fieldwork to alleviate staffing and overtime concerns. These actions included transitioning Operations to a different work group schedule that is intended to increase the pool of individuals available for overtime and reduce overtime on an individual basis. In addition, the KIF plant manager indicated that there are ongoing efforts to reach out to non-TVA fossil plants that are closing to consider hiring employees from those plants. For example, a PO manager is expected to host a job fair at the closing Joppa Power Plant (in Illinois) in August 2022 to explore staffing options for TVA. Finally, the plant manager indicated that a class for Student Generating Plant Operators to become AUOs to meet fleet needs is scheduled to start in October 2023.

Communication Related to KIF's Future

As previously described, current planning assumptions indicate all nine of KIF's units will close during 2027. While interviews indicated that KIF and/or PO management have been communicating information related to the potential retirement of KIF, approximately 32 percent of annual employees interviewed desired more information about KIF's future or indicated a lack of transparency by management. For example, some individuals indicated a lack of information related to plans for the KIF site after closure or what will replace KIF's generation. Additional concerns expressed related to wanting more information about career options and more frequent or regular communication.

Several individuals indicated that information related to the potential closure comes from sources other than PO management. Sources of information that were mentioned included the media, members of the Kingston community, the internet, or other TVA employees. Multiple individuals expressed concerns that management could be more forthcoming with information about KIF's future, with a few individuals indicating that more communication about generation replacement options for KIF could help current employees make more informed decisions about their future.

While no decision has been made regarding KIF's closure or future generation projects, addressing rumors about KIF's future could decrease employee angst and help alleviate some of their concerns.

CONCLUSION

As previously discussed, TVA is evaluating KIF and is currently preparing an EIS, which has a planned scope of identifying various alternatives for the KIF site. In the interim, TVA's current planning assumption projects closure of all nine KIF units during 2027. Based on this assumption, KIF could continue to generate power for at least another 5 years. In addition, one alternative TVA plans to consider in its EIS is the no-action option of continuing to operate KIF with needed upgrades to meet regulatory requirements. In this evaluation, issues were identified related to degradation of equipment and lack of funding. If asset conditions are allowed to persist at KIF, KIF may be at risk of not being able to meet its mission through the potential closure dates. Issues related to lack of staffing and contractor knowledge, along with work prioritization and coordination, may be additional impediments to KIF's ability to be an effective contributor to TVA's mission of providing electricity at the lowest feasible rate and highest feasible reliability.

RECOMMENDATIONS

We recommend the Plant Manager, KIF, and Vice President, PO, Coal:

1. Evaluate the risks resulting from degraded asset condition and mitigate the risks as necessary.

TVA Management's Comments – PO management agreed with this recommendation and committed to continue addressing asset condition issues through business plan processes/initiatives and funding of these assets to meet their intended mission. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned actions.

2. Determine if further actions could be taken to alleviate staffing concerns at KIF, including risks related to contractor knowledge and overtime, and implement as necessary.

TVA Management's Comments – PO management agreed with this recommendation. Management stated they will continue to exhaust avenues to address staffing challenges for KIF and the other coal sites as operational and maintenance needs are balanced within the transitioning coal fleet. See Appendix B for TVA management's complete response.

Auditor's Response - We agree with TVA management's planned actions.

3. Address communication concerns related to KIF's future.

TVA Management's Comments – PO management agreed with this recommendation and stated they will continue to provide timely communication on the asset plan as it relates to KIF and Coal Operations and address concerns as appropriate. See Appendix B for TVA management's complete response.

Auditor's Response - We agree with TVA management's planned actions.

We recommend the Plant Manager, KIF, work with HR to address the identified behavior issues with one individual.

TVA Management's Comments – PO management stated the KIF plant manager has worked with HR to address the issue and acted on the recommendation. See Appendix B for TVA management's complete response.

Auditor's Response - We agree with TVA management's actions taken.

TVA Values	
Safety	We are uncompromising in our commitment to the safety and well-being of our teammates and the communities we serve.
Integrity	We are honest and straightforward, always doing the right thing with integrity.
Inclusion	We treat everyone with dignity and respect – emphasizing inclusion by welcoming each person’s individuality so we can reach our potential.
Service	We are proud to be of service in the communities in which we live, work, and play.

TVA Leadership Competencies

- Accountability and Driving for Results
- Continuous Improvement
- Leveraging Diversity
- Adaptability
- Effective Communication
- Leadership Courage
- Vision, Innovation, and Strategic Execution
- Business Acumen
- Building Organizational Talent
- Inspiring Trust and Engagement

October 3, 2022

David P. Wheeler, WT 2C-K

REQUEST FOR COMMENTS – DRAFT EVALUATION 2022-17355 – ORGANIZATIONAL
EFFECTIVENESS – KINGSTON FOSSIL PLANT

The Kingston Fossil Plant leadership team would like to thank the Office of the Inspector General (OIG), specifically Noel Kawado, Justin Franklin, Jessica Monroe, and Lisa Hammer for their diligence and support in assessing the organizational effectiveness at the site. The results of the assessment are aligned with actions Kingston Fossil Plant (KIF) is already taking to capitalize on opportunities, learnings, and best practices for KIF and future plant closures.

- Operate KIF safely and responsibly through the end of its life to continue meeting Tennessee Valley power needs, including investing in appropriate safety and reliability projects.
- Work closely with our people to listen to and address issues, maintain appropriate staffing at the site, and openly discuss future plans with employees and assist with their career transitions to other TVA positions that are available.
- Responsibly prepare for plant retirement and future site reuse that benefits the local surrounding communities.

The OIG recommendations provided by this assessment align well with actions PO and KIF leadership are taking to proactively address employee concerns and material condition issues. These are fundamental to our approach to plant operations. We are pleased that the OIG's recommendations reinforce focus areas that will be beneficial for KIF's remaining life and other coal site closures.

Recommendations

We recommend the VP, PO, Coal:

1. Evaluate the risks resulting from degraded asset condition and mitigate the risks as necessary

Response

Power Operations agrees with this recommendation. We commit to continue address asset condition issues through business plan processes / initiatives and fund these assets to meet their intended mission.

2. Determine if further actions could be taken to alleviate staffing concerns at KIF, including risks related to contractor knowledge and potentially excessive overtime, and implement as necessary.

Response

Power Operations agrees with this recommendation. We will continue to exhaust avenues to address staffing challenges for KIF and the other coal sites as we balance the operational and maintenance needs of our transitioning coal fleet.

David P. Wheeler, WT 2C-K
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3. Address communication concerns related to KIF's future.

Response

Power Operations agrees with this recommendation. We will continue to provide timely communication on the asset plan as it relates to KIF and Coal Operations and address concerns as appropriate.

We recommend the Plant Manager, KIF, Work with Human Resources to address the identified behavior issues:

Response

The Plant Manager, KIF, has worked with Human Resources to address the identified issue and has acted on the recommendation.

Thank you for the time to allow us to review and provide feedback on the draft evaluation.



Kris G. Edmondson
VP Coal Operations

TLG:TDL

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