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December 10, 2007

Chairman Eddie Roberson
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

ELECTRONICALLY FILED

in docket office on 12/10/07

**Re: Application of Jackson Energy Authority to Expand its Certificate
of Public Convenience and Necessity to Provide Intrastate
Telecommunications Services—Docket No. 07-00201.**

Dear Chairman Roberson:

Please find the First Set of Data Requests submitted on behalf of the Tennessee Cable Telecommunications Association to the Applicant in the referenced matter enclosed herewith. Please return a file-stamped copy for our records in the enclosed self-addressed, stamped envelope.

If I may be of further assistance, please do not hesitate to contact me. I am

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC



Jamie R. Hollin

Enclosure

Cc: Stacey B. Briggs, Esq.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE:)	
)	
APPLICATION OF JACKSON ENERGY)	Docket No. 07-00201
AUTHORITY TO EXPAND ITS CERTIFICATE)	
OF PUBLIC CONVENIENCE AND NECESSITY)	
TO PROVIDE INTRASTATE)	
TELECOMMUNICATIONS SERVICES)	

**FIRST SET OF DATA REQUESTS SUBMITTED TO APPLICANT ON BEHALF OF
TENNESSEE CABLE TELECOMMUNICATIONS ASSOCIATION**

The Tennessee Cable Telecommunications Association (“TCTA”) hereby propounds the following Data Requests to be answered under oath by an authorized agent of Jackson Energy Authority (“JEA” or “Applicant”).

DEFINITIONS

Please note, as used herein:

(a) The word “application” shall mean the application filed with the TRA on August 31, 2007 in Docket No. 07-00201 which is the subject of this proceeding.

(b) The word “document,” “documents,” or “documentation” as used herein, shall have the broadest possible meaning under applicable law, and means any medium, including computers or other electronic media, upon which intelligence or information can be recorded, stored and/or retrieved, whether sent or received or neither, and includes, without limitation, the original and the copy, regardless of origin or location, of any book, record, report, statement, diary, calendar, schedules, progress schedules, time logs, drawings, notes, audio tape, video tape, computer disk, computer tape, computer printout, electronic or voicemail message, work papers,

analyses, pamphlet, periodical, letter, memorandum (including memorandum, note or report of a meeting or conversation) or any other written, typed, reported, transcribed, punched, taped, filmed, electronic or graphic matter, however produced or reproduced, which is in your possession, custody or control. "Document" shall include all copies of documents by whatever means made, including any non-identical copies (or are different from the original because of handwritten notes, underlining, blind carbon copy or otherwise) and drafts of documents.

(c) The word "and" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories information that would not otherwise be brought within their scope.

(d) The word "identify" means, with respect to any statements, documents, acts, practices, occurrences, events, devices, schemes, meetings, conferences, communications, or utterances, the date thereof, the party or parties causing, issuing or communicating such statement, document, communication or utterance, the parties to whom and in whose presence such statements, documents, communication or utterance was given or transmitted, the party who participated in, caused or had knowledge of any act, practice, occurrence, event, device, scheme, meeting or conference, and whether the foregoing was in writing, in which event describe the terms (or attach a copy of any document to the answers to these interrogatories), or oral, in which event state the substance thereof.

(e) The word "identify" or "identity" means, with respect to any person, the name, residential and business address, residential and business telephone number, any known email addresses, places of employment, title or position with such employer.

(f) The word "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

- (g) The acronym “TRA” means the Tennessee Regulatory Authority.
- (h) The words “you,” “your,” or “JEA” means the Jackson Energy Authority and any board member, executive officer, or agent of the Jackson Energy Authority.
- (i) The use of the singular form of any word includes the plural and vice versa; and the use of the masculine gender shall include the feminine and neuter genders.

INSTRUCTIONS

1. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are possessed directly by your or your directors, officers, partners, members, agents, employees, representatives, subsidiaries, managing agents, affiliates, or by your attorneys or their agents, employees, representatives, or investigators.
2. If any requested document or thing cannot be produced in full, produce it to the extent possible, indicating at the time of production, which document(s) or portion(s) thereof being withheld and the reasons therefore.
3. In producing documents, you are requested to produce documents requested together with all non-identical copies and drafts of those documents. If the original documents cannot be located, a copy shall be provided in lieu thereof, and shall be legible and bound or stapled in the same manner as the originals.
4. Documents shall be produced as they are kept in the normal course of business or organized and labeled to correspond to the categories in this Data Request.
5. If you claim the attorney-client privilege, or any other privilege or work-product protections for all or any portion of any documents, that portion of the document need not be produced, but you shall provide: (i) the date of the document; (ii) the authors; (iii) the

recipient(s); (iv) a summary of the document general describing its contents; (v) the basis for the privilege asserted; and (vi) such additional information as is necessary to demonstrate the privileged nature of the document.

6. These Data Requests shall be deemed to be continuing in nature so as to require supplementary answers to the requests and further production of documents if you obtained additional information or documents between the initial production or response and the time of hearing.

7. If JEA disputes or objects to the scope of any request, please respond to all portions of the request that are undisputed on the date requested.

DATA REQUESTS

1. Provide a copy of the business plan submitted to the Office of the Comptroller of the Treasury of the State of Tennessee (the “Comptroller”) when JEA through EPlus Broadband initially sought to enter the cable television and broadband market as required by Tenn. Code Ann. § 7-52-602.

RESPONSE:

2. Provide a copy of the feasibility report issued by the Comptroller in response to JEA’s business plan referred to in Data Request No. 1 as required by Tenn. Code Ann. § 7-52-602.

RESPONSE:

3. Provide a copy of any revised business plan submitted to the Comptroller in light of JEA's desire to provide Internet related services on a retail basis as contemplated in the Application.

RESPONSE:

4. Provide a copy of any feasibility report issued on behalf of the Comptroller in response to any and all of JEA's business plan(s) referred to in Data Request No. 3.

RESPONSE:

5. Provide copies of any and all past, present, and anticipated, future inter-divisional loans between the electric division and the telecom division, including, without limitation, the loan terms, payment schedule, payment due dates, dates of actual payments and the actual financial accounting relative to the inter-divisional loans.

RESPONSE:

6. Any and all *pro forma* financial statements prepared by you or any third party relative to JEA's entry into the retail telecommunications market.

RESPONSE:

7. Any and all documents reflecting term or loan commitments from third parties to JEA to include the identification of the lender and the terms.

RESPONSE:

8. Any and all documents relative to the issuance of a bond or bonds necessary to enable you to finance JEA's entry into the retail telecommunications market, including, without limitation, any and all resolutions passed by JEA and the Jackson City Council.

RESPONSE:

9. Any and all documents reflecting the current indebtedness and repayment of principal and/or interest on any and all obligations incurred by JEA since its entry into the telecommunications, cable television, and Internet markets.

RESPONSE:

Respectfully submitted,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC

By:



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*Attorneys for the Tennessee Cable
Telecommunications Association*

Certificate of Service

I hereby certify that a true and correct copy of the foregoing has been placed in the U.S. mail, postage pre-paid, on this the 10th day of December, 2007 to the following:

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