



**Larry L. Cash**

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December 16, 2021

**VIA ELECTRONIC AND U.S. MAIL**

Monica Smith-Ashford  
Hearing Officer  
Tennessee Public Utility Commission  
Andrew Jackson State Office Building  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243-0001

RE: ***Jackson Sustainability Cooperative***  
Docket No. 21-00061

Dear Hearing Officer Smith-Ashford:

We wanted to provide you with an update on the status of the above-referenced docket. On behalf of Jackson Energy Authority ("JEA"), we submitted interrogatories and requests for production of documents to Jackson Sustainability Cooperative ("JSC"). We have had productive discussions, both in writing and verbally with John Beam, counsel to JSC, and we believe we have resolved most of our discovery disputes. We are waiting for additional information from Mr. Beam, but the parties have worked, and will continue to work diligently to try to resolve their differences. Mr. Beam has agreed to look closer at a couple of issues which we hope will conclude any remaining issues.

I am also authorized to report that Tennessee Electric Cooperative Association and its counsel have engaged in similar productive discussions with JSC counsel John Beam, and they too believe that most discovery disagreements have been addressed and that the remaining issues may soon be resolved.

Unless you direct otherwise, counsel for JEA and TECA will be glad to update you once we have either reached a resolution or reached an impasse on any discovery disputes.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Cash'.

Larry L. Cash

LLC/dac

cc: W. Brantley Phillips (via email only)  
Henry Walker (via email only)  
Matthew Sinback (via email only)  
Caleb Hogan (via email only)  
Jeremy Elrod (via email only)  
Mark W. Smith (via email)

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