

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

**IN RE: THE APPLICATION OF JACKSON )  
SUSTAINABILITY COOPERATIVE ) DOCKET NO. 21-00061  
FOR A DETERMINATION OF EXEMPTION )  
AND IN THE ALTERNATIVE, FOR A )  
CERTIFICATE OF PUBLIC CONVENIENCE )  
AND NECESSITY )**

---

**NOTICE OF DISCOVERY STATUS**

---

COMES NOW the Petitioner, Jackson Sustainability Cooperative, by and through Counsel, and responds to the Order issued January 13, 2022 directing the parties to file a status update on discovery in this matter.

On November 22, 2021, the Petitioner, Jackson Sustainability Cooperative, issued written discovery to three intervening parties: Jackson Energy Authority, Tennessee Valley Authority, and Tennessee Electric Cooperative Association. As of this date, the Petitioner, Jackson Sustainability Cooperative, has not received a written response to its discovery from any of the intervening parties on whom discovery was served.

Commission Rule 1220-01-01-.11(1) provides "[p]arties are encouraged where practicable to attempt to achieve any necessary discovery informally, in order to avoid undue expense and delay in the resolution of the matter at hand..." Therefore, the absence of a case or discovery schedule does not prohibit the Intervening Parties from responding to discovery issued by the Petitioner. Even though discovery in administrative matters of this nature often begins informally, perhaps a status conference and a procedural order is necessary to set a schedule for

responses to the Petitioner's initial written discovery.

Respectfully submitted,



---

John A. Beam, III, BPR #11796  
EQUITUS LAW ALLIANCE, PLLC  
709 Taylor Street  
P.O. Box 280240  
Nashville, Tennessee 37228  
Telephone: (615) 251-3131  
Facsimile: (615) 252-6404  
[beam@equituslaw.com](mailto:beam@equituslaw.com)

Attorneys for Petitioner

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of January, 2022, I electronically filed a true and correct copy of the foregoing with the Tennessee Public Utility Commission which will automatically send email notification of such filing to the following intervening parties, and I emailed and sent by U.S. mail copies to the following parties:

Henry Walker (BPR No. 000272)  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
615-252-2363  
[hwalker@bradley.com](mailto:hwalker@bradley.com)

Kimberly Boulton (BPR No. 024665)  
Office of the General Counsel  
Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville, TN 37902-1401  
865-632-4141  
[kboulton@tva.gov](mailto:kboulton@tva.gov)

W. Brantley Phillips, Jr. (BPR No. 18844)  
Bass Berry & Sims PLC  
150 Third Avenue South, Suite 2800  
Nashville, TN 37201  
(615) 635-742-6200  
[bphillips@bassberry.com](mailto:bphillips@bassberry.com)

David Callis  
Executive Vice President and General Manager  
Tennessee Electric Cooperative Association  
2964 Sidco Drive  
Nashville, TN 37204  
(615) 515-5533  
[dcallis@tnelectric.org](mailto:dcallis@tnelectric.org)

Mark W. Smith (BPR No. 16908)  
Miller & Martin PLLC  
832 Georgia Avenue, Suite 1200  
Chattanooga, TN 37402  
(423) 756-6600  
[mark.smith@millermartin.com](mailto:mark.smith@millermartin.com)

Teresa Cobb, General counsel  
P.O. Box 68  
Jackson, TN 38302  
(731) 422-7500  
[tcobb@jaxenergy.com](mailto:tcobb@jaxenergy.com)

Jeremy L. Elrod (BPR No. 029146)  
Director of Government Relations  
Tennessee Municipal Electric Power Association  
212 Overlook Circle, Suite 205  
Brentwood, TN 37027  
(615) 373-5738  
[jelrod@tmepa.org](mailto:jelrod@tmepa.org)



---

John A. Beam, III