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March 10, 2022
Via Electronic Filing and Via Hand Deliver

Chairman Kenneth C. Hill
Attn: Ectory Lawless, Esq.
Docket & Records Manager
Tennessee Public Utility Commission
Andrew Jackson State Office Building
502 Deaderick Street, Floor
Nashville, TN 37243-0001

Electronically filed in TPUC Docket Room on March 10, 2022 at 9:50 a.m.

Re: Application of Jackson Sustainability Cooperative for a Determination of Exemption and in the Alternative, for a Certificate of Public Convenience and Necessity
Docket No. 21-00061

Dear Chairman Hill:

Enclosed is a copy of the Petitioner's Responses to the Discovery Requests from Jackson Energy Authority and to Tennessee Electric Cooperative Association. One document is bate stamped "JSC - 000871" and is available for public disclosure. There are no CONFIDENTIAL documents in this filing.

This letter confirms that discovery was served on all counsel of record. Let me know if you have any questions.

Sincerely,

John A. Beam, III

enclosure

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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

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

PETITIONER'S RESPONSES TO TENNESSEE ELECTRIC COOPERATIVE ASSOCIATION'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Petitioner Jackson Sustainability Cooperative adopts by reference the Instructions and General Objections raised in its initial response to first set written discovery from Tennessee Electric Cooperative Association. In answering this second set of interrogatories and request for production of documents, Jackson Sustainability Cooperative is not waiving any prior objection provided in response to the first set of interrogatories and request for production of documents.

Jackson Sustainability Cooperative seeks a declaratory ruling from the Commission that its proposed solar facility is not subject to regulation under T.C.A. 65-4-101(6)(A)(v) because it is a non-profit cooperative that is, therefore, deemed not a public utility subject to regulation under the statutory exception found in T.C.A. §65-25-123.

RESPONSES TO ADDITIONAL INTERROGATORIES AND REQUESTS FOR PRODUCTION

40. Produce-or if publicly available, identify-all sustainability policies and other documents supporting Your contention that national companies' sustainability policies "prevent national companies from expanding in cities where renewable energy is not available" or "could

eventually force companies to leave such cities altogether," which "bodes ill for Jackson," as referenced on page 10 of the Direct Testimony of Dennis Emberling, Part II ("Emberling Part II") (JSC-000426).

RESPONSE:

Out of the 7,500 companies issuing annual reports on sustainability, the Brookings Institute studied 40 companies and how they link their sustainability goals to business strategy. (Ingram, George, "How corporations are approaching sustainability and the Global Goals," Brookings, January 8, 2019) Corporations develop goals by taking an acknowledged objective, then linking specific goals to their business interests. (Id.) Over half of the 40 companies studied link sustainability goals to their internal and external business activities, creating specific, measurable, time-bound operational goals. (Id.) Some companies have business activity goals from the "boardroom" to the "loading dock." (Id.) These findings were consistent with a recent survey of 700 global companies in which 54 percent include sustainability goals in their business strategy. On the consumer side, 77% of consumers are more willing to purchase from a company with a sustainability pledge. (Newman, Daniel, "How Leading Global Companies Are Using Sustainability As A Market Differentiator," Forbes, January 24, 2020) From the investor perspective, 73% of investors are more willing to invest in a company with sustainability goals. (Id.) Ninety percent of business leaders believe consumers would hold them accountable for the environmental impact their business makes. (Id.) Mr. Newman observed that "[w]hen the market is saturated with products, the companies that choose to make a difference will stand out for their stakeholders." Customers are loyal to brands "that care about the things they care about."

A quick Google search reveals sustainability policy pledges by Ford, Disney, Fisher

Investments, Hewlett-Packard, Johnson & Johnson, Nike, eBay Eco-initiatives, Starbucks, Chr. Hansen Holding, Neste Corporation, Prologis, Banco de Brasil, GlaxoSmithKline, Everlane, Apple, LEGO, Google, Bosch, and thousands of others. Making supplemental solar energy available is consistent with these goals. These companies who tie their sustainability goals to their business strategy have pledged to locate in communities and expand in communities that are consistent with these goals.

41. Identify the "electrical contractors who service the heavy machinery of these manufacturers in Jackson" who told You that "they suffer from poor power quality from the grid," as stated on page 11 of Emberling Part II (JSC-000427) and produce all communications with these electrical contractors.

RESPONSE:

The Federal Energy Management Program, which is specifically referred to by Mr. Emberling, describes who needs supplemental energy and the problems that can be solved with supplemental energy. (U.S. Dept. Of Energy, "Using Distributed Energy Resources," National Renewable Energy Laboratory, a DOE national laboratory, May 2002) Jackson Sustainability Cooperative has identified several issues in which supplemental electrical energy provides needed value for the consumer: service interruptions, billing based on highest peak usage, and power-quality problems. In the referenced portion of his testimony, Mr. Emberling was referring to how supplemental energy assists with service interruptions and power-quality problems. For example, where there is an unacceptably high incidence in service interruptions, called low reliability, a solar facility that provides supplemental energy with battery storage can

serve critical loads until service is restored by the local municipal provider. (Id., p. 2, 4)

Power-Quality Problems are different from service interruptions. Where the municipal provider serves a facility with energy that is not electrically "clean" or constant, it causes problems with the facility's equipment. (Id., p. 3) These problems include, but are not limited to, voltage sags, spikes, and electrical noise. (Id. p. 3; Ex. 7, Bate Stamped JSC - 000417) Supplemental power with battery storage and regulation of frequency and voltage uses higher-quality electronics that improves power quality. (Id.)

The Federal Energy Management Program helps energy users determine when they have power-quality problems. Examples include seeing lights flicker or go dim or bright; and motors that vibrate, make noise, overheat, or stall. (Id., p.8) Sometimes problems are internal, like causes from improper grounding or from the loads of nearby customers. (Id.) Power-Quality problems are likely where the energy-producing infrastructure is aging. (Id., 1) Mr. Emberling has had numerous discussions with electricians and maintenance personnel who have identified these issues. These discussions are incidental and casual, and Mr. Emberling does not currently recall any specific conversation with any specific person who reported lights that occasionally flicker and motors making noise.

The Federal Energy Management Plan describes one solution to power-quality problems as using "distributed energy resources." (Id., p.1) Distributed energy resources are small, modular, energy-generation and storage technologies located close to where the energy is needed. The solar facility with battery storage proposed by Jackson Sustainability Cooperative is a type of distributed energy resource, because it is physically near the users of its electricity.

42. State all facts supporting Your contention that "[f]or Jackson manufacturers, installing their own renewable generation, such as solar, is impractical and uneconomical," as stated on page 11 of Emberling Part II (JSC-000427) and produce all documents concerning this contention. As a part of your response, identify all "Jackson manufacturers" about whom you contend "installing their own renewable generation, such as solar, is impractical and uneconomical."

RESPONSE:

Jackson Sustainability Cooperative contends that it is impractical and uneconomical for all manufacturers in Jackson, Tennessee to install their own solar facility with battery storage to produce supplemental energy to achieve all of the benefits described in response to Question 41 above and in the Petition. This issue is discussed in more detail in the Feasibility Study (JSC Confidential 500062 through 500065)

The Feasibility Study explains how shared solar projects are experiencing a dramatic upsurge in the United States. (JSC Confidential 500062 citing the U.S. Department of Energy's National Renewable Energy Laboratory, and the Solar Energy Industries Association) This upsurge in 43 states is, in part, the result of economies of scale, optimal siting, and making solar available to many businesses that cannot economically acquire their own renewable energy. (Id.) Private solar ownership is deterred by Tennessee Valley Authority's (TVA) throughout its service territory by its refusal to allow shared solar to be distributed over local grids. (JSC Confidential 500063) CleanEnergy.org's "Solar in the Southeast 2018 Annual Report" describes how TVA, which is not subject to federal or state regulatory oversight, undercuts solar development by implementing a 'dual meter scheme." (JSC Confidential 500064)

Under the TVA dual meter scheme, the customer sells all its solar power to TVA at wholesale rates. Then the customer must buy all of its power from its municipal provider at retail rates. (Id.) The dual meter scheme is harmful to the economics of owning or sharing solar generation, as stated by Mr. Emberling. (JSC-000427) Though other factors are unfavorable for privately-owned or shared solar, such as weather in Tennessee, the dual meter scheme contributes significantly to the impracticality for practically all Jackson manufactures to install their own solar energy generation facility. (Id.) Without using the TVA grid to distribute electrical energy, Jackson Sustainability Cooperative is providing a shared community solar facility to help a few, nearby, heavy commercial users of electricity obtain the benefits of renewable solar energy. (Id.)

In addition to the authorities mentioned in the Feasibility Study, there are several articles on this subject in MicrogridKnowledge.com. (See e.g. Hoffman, Steve, "10 Lessons Learned from Successful Community Microgrids," December 1, 2020)

In his Direct Testimony, Mr. Emberling lists many of the obstacles that make it impractical for a single business to build its own solar facility. (Ex. 14, JSC 000378 and 000379) His list of obstacles to managing your own solar facility include the following:

1. Lack of suitable land or roof space
2. Sub-optimal weather
3. Technical problems of acquisition and construction
4. Operating and maintaining the solar facility
5. Needing to upgrade the system periodically
6. Loss of freedom to relocate business
7. High cost of privately-owned solar
8. High cost of battery storage systems
9. Lack of state incentives
10. Lack of attractive financing
11. Lack of tax benefits
12. Lack of Net Metering programs
13. Utility rate-schedules that are unfavorable to private generation (Id.)

43. State all facts supporting Your contention that a major reason TVA's resellers, including JEA, are refusing to sign TVA's new long-term agreements and considering not renewing their current TVA contracts is "so that they can look elsewhere for renewables," as stated on page 11 of Emberling Part II (JSC-000427) and produce all documents concerning this contention.

RESPONSE:

TVA has power contracts with local power companies ("LPCs"). These contracts provide for the purchase of power by LPCs at wholesale rates established by the TVA Board. Under the TVA Act, the TVA Board is authorized to regulate LPCs to carry out the purposes of the TVA Act through contract terms and conditions as well as through rules and regulations. TVA regulates LPCs primarily through the provision of TVA's wholesale power contracts. All of the power contracts between TVA and the LPCs require that power purchased from TVA be sold and distributed to the ultimate consumer without discrimination in rates, rebates, or other special concessions. Almost all of these contracts specify the resale rates and charges at which the LPC must resell TVA power to its customers. These rates are revised from time to time, subject to TVA approval, to reflect changes in costs, including changes in the wholesale cost of power. TVA also regulates LPC policies for customer deposits, termination of service for non-payment, information to consumers, and billing through a service practice policy framework. (source, Form 10-K, September 30, 2018, Securities Exchange Commission, p. 11, f.n.1)

Representing 9% of TVA sales in 2018, one LPC, Memphis Light, Gas and Water Division ("MLGW") has a contract with TVA that includes a five-year termination notice period. (Id.) Paragraph 17 of the Petition relies on findings from the Integrated Resource Plan for

MLGW, which found that generating up to 75% of electric energy from renewable sources was optimal to provide the best prices to consumers. (Bate Stamped JSC - 000012) The Integrated Resource Plan for MLGW is attached to the Petition as Exhibit 6. (Bate Stamped JSC - 000121) In the Integrated Resource Plan, MLGW reviews all options to find sources to supply its electric load for customers. (Id., Bate Stamped JSC - 000125) Siemens conducted the independent study to compare the TVA contract with other alternatives. (Id., Bate Stamped JSC - 000126) After examining multiple scenarios, Siemens concluded that the best performance for the customer would come from self supplying electricity with supplemental energy from Arkansas, with the added benefit that self supply would include "high levels of generation from zero carbon sources reaching levels from 52% to 75% when fully developed." (Ex. 6, p. 10, Bate Stamped JSC - 000131 and 000178) Under the self supply model, CO2 emissions are reduced by almost 50% of TVA levels. (Id.) Self supplying energy meets or surpasses all reliability requirements established by the North American Electric Reliability Corporation (NERC)(a not-for-profit regulatory authority who sets standards for reliability). (Id.)

The findings by Siemens that purchasing from TVA was not the best alternative for Memphis customers was not news. TVA trails most utilities in promoting energy efficiency. (Flessner, Dave, "TVA trails most utilities," Chattanooga Times Free Press, January 27, 2021) In recent years, TVA has eliminated many of the programs, rebates, loans and other subsidies it once offered to promote energy efficiency. (Id.)

44. Produce all documents concerning the feasibility research performed by David Shimon and/or "large solar developers," as referenced on page 12 of Emberling Part II

(JSC-000428).

RESPONSE:

There are no documents responsive to this request. Solar developers in other states did not have an interest in pursuing a project in Tennessee because of TVA (see response to Question 43 above) and because Tennessee lacks incentive programs for producing energy from renewable sources. A good example of programs that effectively incentivize renewable energy generation are the programs offered in North Carolina to its residents.

45. Produce all documents concerning the efforts and analysis performed by Dennis Emberling and/or his "friends and colleagues in the solar industry" to "make it work," as referenced on page 12 of Emberling Part II (JSC-000428) and identify these "friends and colleagues in the solar industry."

RESPONSE:

The Feasibility Study is the document that explains how Jackson Sustainability Cooperative desires to "make it work" through development of a shared solar facility that provides supplemental energy from renewable sources. (Ex. 14, Feasibility Study, Bate Stamped JSC CONFIDENTIAL500057 to JSC CONFIDENTIAL 500087) This document describes the proposed solar facility and reflects the efforts and analysis of Mr. Emberling. Reflecting his collegial style, Mr. Emberling spoke with numerous persons about various sections of the Feasibility Study. Most notable, was Greg Noble at Northern Reliability, and Michael Kahn, a leading California SunPower dealer.

46. Identify the "foundations eager to help in Jackson" referenced on page 12 of Emberling Part II (JSC-000428) and produce all documents, including communications, with or concerning these foundations.

RESPONSE:

Please see response to Question 47 and to Question 50 below. There are no formal arrangements with any foundation. Once the applicant's solar facility is operational and stabilized, Mike Miner and John Meyer will be instrumental in identifying local foundations to support to revitalize Jackson. Mr. Miner and Mr. Meyer are eager to see the Petitioner play a role in the Hub City Plan implemented by Mayor Scott Conger, especially in East Jackson. There are no documents responsive to this request.

47. Identify all facts concerning your contention that "We and our partners committed to contribute a share of the project's revenue to help redevelop East Jackson, upgrade its housing, and improve its dilapidated infrastructure," as referenced on page 12 of Emberling Part II (JSC-000428) and produce all documents concerning such commitments.

RESPONSE:

Mike Miner is a West Point graduate, retired Army Lieutenant Colonel, and professor of mathematics who grew up in Jackson, Tennessee. After his military career, Mr. Miner returned to his hometown in Jackson, Tennessee where he was instrumental in forming The Mound City Foundation. Mr. Miner was tired of seeing vacant lots and run down housing in his hometown. One house at the time, The Mound Foundation is seeking to revitalize neighborhoods. The Mound Foundation recognizes that building homes for Senior Citizens and Veterans makes the

community stronger because these groups have long term vested interests in seeing the community prosper.

Jackson Sustainability Cooperative hopes to help build a stronger community through its prospective work with The Mound Foundation and other nonprofit charitable groups with a shared interest in community revitalization. Because this work is dependent on completion of the solar facility, there are no documents that express the strong policy of revitalizing East Jackson. There are others in Jackson who see the need for revitalization. By way of example, some of these reports that emphasize the needs of the community are as follows:

a. Jackson Community Redevelopment Plan Report - FINAL - Draft District 2
b. Jackson Redevelopment Plan
c. Jackson Workable Program 2009 - 8127 -CRARReportDraft-090224-print
d. South Jackson Revitalization Project - Bemis Redevelopment Plan
e. Tennessee-Brownfield-Redevelopment Toolbox

48. Identify the "companies, organizations, individuals, advocacy groups, and governmental agencies" that "have been so eager to help with this project," and the people and businesses that are "so enthusiastic," as stated on page 13 of Emberling Part II (JSC-000429) and produce all documents concerning such entities' support for and help with the project.

RESPONSE:

Objection. Interrogatory 48 is overly broad by asking to identify all companies, organizations, individuals, advocacy groups, and government agencies that have responded with a positive outlook. Without waiving this objection, see response to Interrogatory 12 and Interrogatory 13 for the names of individuals. Jackson Sustainability Cooperative is humbled and grateful for the many organizations who filed with Tennessee Public Utility Commission in

this matter. By discussing a few, many will be left out. With more than 26,000 supporters in Tennessee, the Southern Alliance for Clean Energy ("SACE") is a nonprofit focused on transforming the way people produce and consume energy. SACE stated in its amicus filing (PUC filing 2100061ad) as follows:

> The Jackson solar + storage project will bring many benefits to the Jackson community. The combination of solar with storage adds a particularly resilient component to the well documented economic and environmental benefits of local solar and the cooperative structure of the project would extend the benefits of solar to businesses for which solar is currently difficult to access.

The U. S. Department of Energy's National Community Solar Partnership gave the solar facility project national recognition for innovation and contribution to expanding national access to solar (Ex 14, Bate Stamped JSC- 000376). The U.S. Department of Energy has regularly assisted with publications by the Department on numerous issues, from the benefits of solar to the many problems solved by using supplemental distributed energy. (see e.g. response to Question 41 above)

The Mound Foundation has expressed support. (see response to Question 47 above).

Sharing in the common goals as the Petitioner, Greg Noble and his associates at Northern Reliability were instrumental in providing a comprehensive contract for the construction of the facility and design of critical components. Michael Kahn and his associates at SunPower were instrumental in determining the layout for the solar facility and providing overall guidance.

Persons attending the public meetings showed strong support. (Bates Stamped JSC Confidential - 500053 to 500056). In obtaining approval for the site plan, the following persons have shown support for a solar facility in Jackson, Tennessee:

John Dodd, Jackson City Council Member

Stan Pilant, Jackson Planning Department Manager
The staff of the Jackson Planning Department
The majority of the Jackson/Madison Planning Commission

The approved site plan is provided at Bate Stamped JSC 000355.

49. State all facts that support Your contention that "[t]he only way right now for businesses that need a lot of electricity to get uninterruptible, high-quality, renewable energy is to share a facility with other similar companies," as stated on page 14 of Emberling Part II (JSC-000430), including whether You are aware of businesses that need a lot of electricity that have gotten uninterruptible, high-quality, renewable energy without sharing a facility with similar companies, and, if so, identify these businesses.

RESPONSE:

Sharing a solar facility is at the very core of the purpose behind this Petition filed with the Tennessee Public Utility Commission. Section 1.1 of the Bylaws of Jackson Sustainability Cooperative express that the organization was formed to "assist .. members in sharing supplemental electrical energy from renewable sources." (Bate Stamped JSC 000032) The shared facility will assist members "[t]o avoid costs caused by grid outages by gaining access to solar power, without having to resort to dangerous and toxic fossil-fuel backup generators." (Id.) In contrast, the only current solution to grid failures is the use of backup generators that do not rely on renewable energy sources. The solar facility's "higher quality power in terms of voltage and frequency regulation" "reduces stresses on the Tennessee Valley Authority's grid and the Jackson Energy Authority distribution system."

JEA and TVA are either unable or unwilling to provide practical solutions to business for

grid failures and they harm they cause, leaving it up to individual businesses to provide their own back up energy sources, which in most cases are diesel-powered generators that are started after the failure. Jackson Sustainability Cooperative helps solve the problem of grid failure with high quality energy from renewable sources that is nearly instantly available to meet the load.

Informally, it appears that most employers in East Jackson do not have back up generators capable of preventing short term, temporary interruptions in electrical power. There are obvious good reasons for this: high cost, high pollution, and dangers to their employees. The proposed solar facility with battery storage is a solution to short term, temporary interruptions in the electrical energy supplied by JEA and TVA. Sharing a solar facility with batter storage appears not only a viable option, but the best option to prevent short term, temporary power interruptions from disrupting industrial processes at great cost to manufacturers. It is common knowledge that manufacturing facilities lose more money per hour when shut down than they make when operating.

50. Explain how a co-operative, as opposed to some other corporate form, "serves its members as a useful nonprofit vehicle to contribute in many ways to the redevelopment and economic improvement of their community," as referenced on page 14 of Emberling Part II (JSC-000430).

RESPONSE:

See response to Question 47 above. Jackson Sustainability Cooperative hopes to lead one community in its efforts to transition to clean energy. That is more than an environmental benefit, because it brings cost savings and economic growth to its members and the community.

The nonprofit cooperative allows all members to move toward greater use of clean energy. These same civic-minded members know that filling clean energy jobs and leasing waste land for solar panels will bring new tax revenues to the community. These broader economic impacts are perceived as investments in the East Jackson community, a community that has suffered through extreme weather damage and hard economic times. Beyond the financial and economic benefits, the cooperative will bring a commitment to supporting and improving lives in the community. Members cooperating to accomplish a common goal will, hopefully, be a catalyst for revitalization. The non-profit cooperative will deliver reliable, affordable, and responsible electricity to the community. It will also become a stimulus for reaching other common goals for the community, a community in need of revitalization. The Tennessee Electric Cooperative Association website echoes these same sentiments when it states: "Electric co-ops power everyday life for rural and suburban Tennessee, but the work of co-ops goes beyond simply keeping the power on. The figures ... tell the story of how co-ops truly impact the communities they serve." Jackson Sustainability Cooperative hopes to live up to this tradition established by the TECA.

51. Identify all persons and entities included in the term "we," as used in the sentence, "[s]ince all these goals fit perfectly with what we and our partners want to do for Jackson, we launched the co-operative," as stated on page 15 of Emberling Part II (JSC-000431).

RESPONSE:

On page 15 of Emberling Part II, "we" means the solar developer, Community Development Enterprises - Jackson I ("CDE"). CDE is a joint venture. (See the venture

agreement, Bate Stamped JSC Confidential - 500088 to 500103)

52. Explain how "our engineers" will choose the group of companies that will be served, as referenced on page 15 of Emberling Part II (JSC-000431) and produce all documents concerning the criteria for membership and the process for choosing members (e.g., checklists, criteria lists, scoring sheets, analysis of existing conditional members or potential members).

RESPONSE:

Objection. This question was previously asked and answered in response to Interrogatory 12 and Interrogatory 22 in the first set of interrogatories. Without waiving that objection, at this time there are no checklists, criteria lists, scoring sheets, or analysis of existing conditional members or potential conditional members. The National Renewable Energy Laboratory has a technical report that establishes good practices and reviews the steps necessary to integrate supplemental solar energy with power from the grid. (An Overview of Distributed Energy Resource (DER) Interconnection, NREL Technical Report TP-6A20-72102, April 2019) Jackson Sustainability Cooperative will, when the time comes, analyze the usage profiles of potential members and determine which fit best together to optimize usage of the electricity generated by the facility and stored in its batteries.

53. Produce all documents concerning the award received by the Jackson Solar Project, as referenced on page 19 of Emberling Part II (JSC-000435).

RESPONSE:

The email from the National Community Solar Partnership is provided as Bate Stamped

JSC - 000871. The award was for legal services that are subject to the attorney client privilege.

VERIFICATION

I, Dennis Emberling, as President of Jackson Sustainability Cooperative, swear and/or affirm that the foregoing Interrogatory Responses are true and accurate to the best of my knowledge, information, or belief.

Jackson Sustainability Cooperative

By: Dennis Emberling
Dennis Emberling, President

STATE OF TENNESSEE)
) SS
COUNTY OF DAVIDSON)

Before me, Dennis Emberling, of the state and county aforesaid, personally appeared Dennis Emberling, with whom I am personally acquainted, or proved to me on the basis of satisfactory evidence, and who, upon oath, acknowledged himself/herself to be the authorized representative of Jackson Sustainability Cooperative, and that he/she executed the foregoing instrument for the purpose therein contained, by signing the name of the corporation by himself/herself as the duly authorized representative.

WITNESS my hand at office, this 2 day of March, 2022.

Diane T. Bearre
NOTARY PUBLIC

My commission expires: 12-26-2022

DIANE T. BEARRE
STATE OF TENNESSEE NOTARY PUBLIC
MAURY COUNTY

Respectfully submitted,

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Facsimile: (615) 252-6404
Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of March, 2022, I filed Responses To Discovery with the parties named below and filed a true and correct copy with the Tennessee Public Utility Commission within three days, and I emailed and sent by U.S. mail copies to the following parties:

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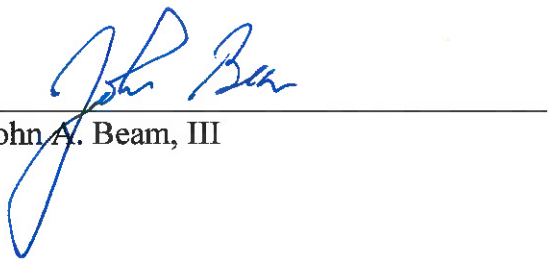

John A. Beam, III

-------- Forwarded Message --------
Subject:NCSP technical assistance application
Date: Thu, 9 Jul 2020 13:53:45 -0700
From: Greg Leventis <gleventis@lbl.gov>
To:de@mtrandc.com

We are pleased to let you know that we would like to offer your organization [and your team] free technical assistance based on your application.

You will be working with Keyes and Fox, who will be reaching out to you shortly to get started and discuss next steps. If you have questions in the meantime, you can contact Greg Leventis through the community platform.

Good luck!
NCSP team

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