



Larry L. Cash

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November 23, 2022

Electronically Filed in TPUC Docket Room
on November 23, 2022 at 3:01 p.m.

VIA ELECTRONIC AND VIA U.S. MAIL

Ectory Lawless, Esq.
Tennessee Public Utility Commission
Andrew Jackson State Office Building
502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

RE: Jackson Sustainability Cooperative
Docket No. 21-00061

Dear Ms. Lawless,

We enclose the original and four copies of the Intervenor Jackson Energy Authority's Request for Attorneys' Fees consistent with Hearing Officer Monica Smith-Ashford's Initial Order Granting, In Part and Denying, In Part Motions to Compel Filed by Tennessee Electric Cooperative Association and Jackson Energy Authority dated November 14, 2022.

Sincerely yours,

Larry L. Cash

LLC/gs

Enclosures

cc: Mark Smith
Brant Phillips
Matt Sinback
Caleb Hogan
Henry Walker
Theresa Cobb
Kimberly Bolton

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

IN RE:

**PETITION OF JACKSON
SUSTAINABILITY COOPERATIVE
FOR DETERMINATION OF
EXEMPTION OR, ALTERNATIVELY,
CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY.**

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Docket No. 21-00061

NOTICE OF FILING

Comes Jackson Energy Authority (“JEA”), by and through counsel, and submits its Request for Attorney’s Fees pursuant to the Initial Order Granting, In Part and Denying, In Part Motions to Compel Filed by Tennessee Electric Cooperative Association and Jackson Energy Authority dated November 14, 2022. A breakdown of the requested fees is attached as Exhibit A.

Respectfully submitted,

MILLER & MARTIN PLLC

By: 

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JACKSON ENERGY AUTHORITY

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Attorneys for: Jackson Energy Authority

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2022, a copy of the foregoing document was served on the following persons via email, hand delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

John A. Beam, III
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MILLER & MARTIN PLLC

A handwritten signature in blue ink, appearing to read "J. L. Elrod", is written over a horizontal blue line.

Bill Date	Date	TKPR Name	Billed Amt	Bl Hrs	Narrative
7/19/2022	6/2/2022	Cash, Larry L	\$204.00	0.6	Preliminary review of JSC Response to Motion to Compel; Receiving and reviewing correspondence from H. Walker re response; Receiving and reviewing correspondence from attorneys Phillips and Hogan re meeting to prepare for hearing and preparation of reply;
7/19/2022	6/3/2022	Cash, Larry L	\$408.00	1.2	Detailed review of JSC Response to Motion to Compel; Correspondence to all counsel re document retention policy allegations and receiving and reviewing reply; Receiving and reviewing correspondence from T. Cobb and preparation of reply;
7/19/2022	6/7/2022	Cash, Larry L	\$510.00	1.5	Detailed review of JSC Responses to deficiency letters and out line of issues to be addressed; Conference call with attorney Phillips and Walker preparing for hearing on Motion to Compel;
7/19/2022	6/8/2022	Morris, Rachel	\$23.00	0.1	Review of Notice concerning oral arguments.
7/19/2022	6/13/2022	Morris, Rachel	\$23.00	0.1	Review of Notice of Hearing on Motions to Compel.
7/19/2022	6/16/2022	Cash, Larry L	\$136.00	0.4	Receiving and reviewing correspondence from H. Walker re issues to raise at hearing on Motion to Compel; Preparation of memorandum to M. Smith re same, and analysis as to additional input;
7/19/2022	6/20/2022	Cash, Larry L	\$1,326.00	3.9	Preparation for hearing on Motion to Compel; Trip to Nashville;
7/19/2022	6/21/2022	Cash, Larry L	\$2,278.00	6.7	Participation in hearing before TPUC; Meeting with all intervenors' counsels; Return from Nashville; Telephone conference with T. Cobb reporting as to hearing; Receiving and reviewing correspondence from H. Walker;
7/19/2022	6/27/2022	Cash, Larry L	\$238.00	0.7	Receiving and reviewing Transcript of Proceedings;
		Total:	\$5,146.00	15.2	

Bill Date	Date	TKPR Name	Billed Amt	Bl Hrs	Narrative
6/22/2022	5/2/2022	Cash, Larry L	\$272.00	0.8	Receiving and reviewing response from JSC to deficiency letter; Preparation of report transmitting response to T. Cobb with explanation;
6/22/2022	5/2/2022	Morris, Rachel C	\$46.00	0.2	Review of correspondence from Jackson Sustainability Cooperative concerning discovery responses and production from Northern Reliability Inc.
6/22/2022	5/12/2022	Morris, Rachel	\$46.00	0.2	Review of Partial Procedural Schedule for Motions to Compel.
6/22/2022	5/17/2022	Cash, Larry L	\$136.00	0.4	Reviewing and analyzing confidential documents from Northern Reliability;
6/22/2022	5/20/2022	Cash, Larry L	\$578.00	1.7	Preparation of draft Motion to Compel and Memorandum in Support; Reviewing and analyzing memorandum in Support of TECA Motion to Compel; Revisions to Motion and Memorandum; to TECA counsel; Correspondence to T. Cobb;
6/22/2022	5/26/2022	Cash, Larry L	\$102.00	0.3	Receiving and reviewing correspondence from Hearing Officer re hearing on Motion to Compel; Preparation of correspondence to all Intervener's counsel; Receiving and reviewing reply and receiving and reviewing correspondence from attorney Beam;
6/22/2022	5/31/2022	Morris, Rachel	\$23.00	0.1	Review of Notice of Hearing concerning Motions to Compel.
		Total:	\$680.00	2	
Bill Date	Date	TKPR Name	Billed Amt	Bl Hrs	Narrative
5/13/2022	4/13/2022	Cash, Larry L	\$272.00	0.8	Preparation of memorandum re deficiencies in discovery responses; Notice of Satus Conference from Hearing Officer and receiving and reviewing suspension of Motion to Compel deadline;



5/13/2022	4/8/2022	Cash, Larry L	\$68.00	0.2	Receiving and reviewing correspondence from attorney Sinback re further amendment to Scheduling Order due to Northern Reliability delay in producing documents; Receiving and reviewing correspondence from H. Walker;
5/13/2022	4/26/2022	Cash, Larry L	\$238.00	0.7	Reviewing and analyzing confidential documents produced pursuant to subpoena by Northern Reliability; Preparation of report to T. Cobb re documents;
5/13/2022	4/5/2022	Cash, Larry L	\$238.00	0.7	Receiving and reviewing correspondence from T. Cobb and preparation of report as to documents from third parties; Reviewing and analyzing Hunt Solar documents produced pursuant to subpoena; Correspondence to Hearing Office advising that JEA had no objection to revised Protective Order;
5/13/2022	4/26/2022	Morris, Rachel C	\$46.00	0.2	Attention to obtaining Northern Reliability Confidential documents produced in response to TECA subpoena.
5/13/2022	4/18/2022	Morris, Rachel C	\$92.00	0.4	Attention to retaining Northern Reliability subpoena response and document production.
5/13/2022	4/11/2022	Cash, Larry L	\$68.00	0.2	Receiving and reviewing Status Report from TECA counsel to Hearing Officer; Receiving and reviewing correspondence from Hearing Officer re Scheduling Order;
5/13/2022	4/18/2022	Cash, Larry L	\$374.00	1.1	Participation in Status Conference with hearing officer; Preparation of memo re deadlines; Initial review of Northern Reliability documents;
5/13/2022	4/20/2022	Cash, Larry L	\$238.00	0.7	Preparation of draft deficiency letter;
5/13/2022	4/1/2022	Cash, Larry L	\$238.00	0.7	Reviewing and analyzing Synergy documents; Reviewing and analyzing Motion to Amend Protective Order; Receiving and reviewing correspondence from TECA counsel and from TCA counsel;
5/13/2022	4/27/2022	Cash, Larry L	\$102.00	0.3	Review of Feasibility study as to additional plans for microgrids and comparison to discovery responses;
5/13/2022	4/7/2022	Cash, Larry L	\$102.00	0.3	Review of SynEnergy and E A Solar confidential documents;
5/13/2022	4/21/2022	Cash, Larry L	\$272.00	0.8	Revisions to deficiency letter; Receiving and reviewing correspondence from attorney Sinback re deficiencies;
Total:			\$2,348.00	13	

Bill Date	Date	TKPR Name	Billed Amt	Bl Hrs	Narrative
4/20/2022	3/22/2022	Cash, Larry L	\$102.00	0.3	Receiving and reviewing correspondence from H. Walker re potential Motion to Compel filing and preparation of reply;
		Total:	\$102.00	0.3	

11/8/2022	Cash, Larry	\$444.00	1.4	Preparation for Status Conference; participation in Status Conference and receiving opinion as to award of fees; call with T. Cobb.
	Total:	\$444.00	1.4	
	Total Fees	\$12,373.00		