



**Larry L. Cash**

Direct Dial (423) 785-8394  
Direct Fax (423) 321-1694  
Larry.Cash@millermartin.com

November 28, 2022

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

Electronically Filed in TPUC Docket Room  
on November 28, 2022 at 1:59 p.m.

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 Supplemental Notice of Filing with its Attorneys' Fees request, filed 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. The filing corrects mathematical calculations in JEA's filing of November 23, 2022.

Sincerely yours,

Larry L. Cash

LLC/dac

Enclosures

cc: Mark Smith  
Brant Phillips  
Matt Sinback  
Caleb Hogan  
Henry Walker  
Teresa Cobb  
John Beam  
Jeremy Elrod

26032032v1  
15509-0006

Volunteer Building Suite 1200  
832 Georgia Avenue | Chattanooga, TN | 37402-2289  
Office 423.756.6600 Fax 423.785.8480  
millermartin.com

**ATLANTA  
CHARLOTTE  
CHATTANOOGA  
NASHVILLE**

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

<b>IN RE:</b>	)	
	)	
<b>PETITION OF JACKSON</b>	)	
<b>SUSTAINABILITY COOPERATIVE</b>	)	
<b>FOR DETERMINATION OF</b>	)	Docket No. 21-00061
<b>EXEMPTION OR, ALTERNATIVELY,</b>	)	
<b>CERTIFICATE OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY.</b>	)	

**SUPPLEMENTAL NOTICE OF FILING**

Comes Jackson Energy Authority (“JEA”), by and through counsel, and supplements it’s requested attorney’s fees submitted with its Notice of Filing of November 23, 2022 with the attached Supplemental request for attorney’s fees (**Exhibit A**). JEA would show that this Supplemental filing does not change any of the requested fees but corrects mathematical errors in the November 23, 2022 Request.

JEA also submits the Declaration of Larry L. Cash attached hereto as **Exhibit B**.

Respectfully submitted,

**MILLER & MARTIN PLLC**

By: \_\_\_\_\_

Larry L. Cash (BPR No. 9386)

[larry.cash@millermartin.com](mailto:larry.cash@millermartin.com)

Mark W. Smith (BPR No. 16908)

[mark.smith@millermartin.com](mailto:mark.smith@millermartin.com)

832 Georgia Avenue, Suite 1200

Chattanooga, Tennessee 37402

Telephone: (423) 756-6600

Facsimile: (423) 785-8480

**JACKSON ENERGY AUTHORITY**

Teresa Cobb, General Counsel

[tcobb@jaxenergy.com](mailto:tcobb@jaxenergy.com)

P. O. Box 68

Jackson, Tennessee 38302

Telephone: (731) 422-7500

Facsimile: (731) 488-7221

*Attorneys for: Jackson Energy Authority*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 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  
[beam@equituslaw.com](mailto:beam@equituslaw.com)  
Equitus Law Alliance, PLLC  
P.O. Box 280240  
Nashville, TN 37208

Henry Walker  
[hwalker@bradley.com](mailto:hwalker@bradley.com)  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203

W. Brantley Phillips, Jr.  
[bphillips@bassberry.com](mailto:bphillips@bassberry.com)  
Matthew J. Sinback  
[msinback@bassberry.com](mailto:msinback@bassberry.com)  
Caleb H. Hogan  
[caleb.hogan@bassberry.com](mailto:caleb.hogan@bassberry.com)  
Bass Berry & Sims PLC  
150 Third Avenue South, Suite 2800  
Nashville, TN 37201

Jeremy L. Elrod  
[jelrod@tmepa.org](mailto:jelrod@tmepa.org)  
Director of Government Relations  
Tennessee Municipal Electric Power Association  
212 Overlook Circle, Suite 205  
Brentwood, TN 37027

**MILLER & MARTIN PLLC**



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.
		<b>Total:</b>	<b>\$5,146.00</b>	<b>15.2</b>	

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.
		<b>Total:</b>	<b>\$1,203.00</b>	<b>2</b>	
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.
<b>Total:</b>			<b>\$2,348.00</b>	<b>13</b>	

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.
		<b>Total:</b>	<b>\$102.00</b>	<b>0.3</b>	
	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.
		<b>Total:</b>	<b>\$444.00</b>	<b>1.4</b>	
<b>Total Fees</b>			<b>\$9,243.00</b>		

**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.**

Docket No. 21-00061

**AFFIDAVIT OF LARRY L. CASH**

Comes the Affiant, Larry L. Cash, after being duly sworn according to law and states as follows:

1. I am a citizen and resident of Chattanooga, Hamilton County, Tennessee. I am over the age of 21 years of age, and I have personal knowledge of the facts set forth herein.

2. I am a member of the firm of Miller & Martin PLLC, and I am one of the attorneys representing Jackson Energy Authority ("JEA") in this matter. I have practiced law in Tennessee since October 1981. The other Miller & Martin PLLC attorney primarily responsible for representing JEA includes Mark W. Smith who has practiced law since 1994.

3. Between March 22, 2022 and November 8, 2022, JEA incurred fees for attorney and paralegal time in the amount of \$9,243.00 in connection with a discovery dispute covered by the Hearing Officer's Initial Order of November 14, 2022.

4. The work performed is set forth as an itemized entries on **Exhibit A** attached to JEA's Notice of Filing of November 22, 2022, as supplemented (for mathematical errors) with JEA's Supplemental Notice of Filing filed herewith, on November 28, 2022.

5. Considering, among other factors, the time and labor required, the novelty and difficulty of the questions involved, the skill requisite to perform the services, the fees, customarily





charged in the locality for similar services, as well as the experience, reputation, and ability of the lawyers performing the services, the attorneys' fees detailed in **Exhibit A** are exceedingly reasonable and necessary for the work performed for JEA by attorneys at Miller & Martin PLLC.

FURTHER THIS AFFIANT SAITH NOT.

  
\_\_\_\_\_  
Larry L. Cash

STATE OF TENNESSEE  
COUNTY OF HAMILTON

Before me, a Notary Public in and for the State and County aforesaid, personally appeared the within named Affiant, Larry L. Cash, with whom I am personally acquainted, (or proved to me on the basis of satisfactory evidence) who made oath that the statements contained in the foregoing Affidavit are true of Affiant's own knowledge.

WITNESS my hand and official seal this 28<sup>th</sup> day of November, 2022.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

6-24-23

