

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**NASHVILLE, TENNESSEE**

**February 27, 2023**

<b>IN RE:</b>	)	
	)	<b>DOCKET NO.</b>
<b>PETITION OF JACKSON SUSTAINABILITY</b>	)	<b>21-00061</b>
<b>COOPERATIVE TO DETERMINE IF A</b>	)	
<b>CERTIFICATE OF CONVENIENCE AND</b>	)	
<b>NECESSITY IS NEEDED</b>	)	

---

**PETITIONER'S REQUEST FOR THE NOTICE SENT TO THE  
OFFICE OF THE ATTORNEY GENERAL**

---

Pursuant to Rule 1220-01-02-.10, the Commission is required to give notice to the Office of the Attorney General of Tennessee whenever the validity of an administrative rule or regulation is drawn into question. The Commission is clearly relying on the validity of its rules and regulations adopting the Rules of Civil Procedure to impose sanctions, while the Petitioner has clearly challenged the validity of such a rule to the extent that it allows the Commission to directly impose sanctions against the Petitioner, rather than apply to a court for an order of compliance.

Please send the Petitioner a copy of this notice that specifies the pertinent statutes and regulations, and the response from the Office of the Attorney General, if any. The Petitioner would like a full understanding of the procedural record in this determination before making its decision to file a UAPA appeal. At the present time, a copy of such notice does not appear to be in the record.

Respectfully submitted,

/s/ David H. Wood

John A. Beam, III (BPR# 11796)

beam@equituslaw.com

David H. Wood (BPR# 35489)

wood@equituslaw.com

Equitus Law Alliance, PLLC

709 Taylor Street, Nashville, Tennessee 37208

P.O. Box 280240, Nashville, Tennessee 37228

(615) 251-3131

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via either U.S. Mail, postage prepaid, or email to the following on the 27th day of February, 2023.

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

(423) 756-6600

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

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)

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)

/s/ John Beam  
John A. Beam, III

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)  
Erin Steelman (BPR No. 38463)  
Miller & Martin PLLC  
832 Georgia Avenue, Suite 1200  
Chattanooga, TN 37402