

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

In re:)	
)	
PETITION OF JACKSON SUSTAINABILITY)	Case No. 21-00061
COOPERATIVE TO DETERMINE IF A)	
CERTIFICATE OF CONVENIENCE AND)	
NECESSITY IS NEEDED)	

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APPLICANT'S MOTION TO DISMISS PETITION WITH PREJUDICE

Comes the Applicant, Jackson Sustainability Cooperative, and moves the Commission to dismiss the petition to determine if a Certificate of Convenience and Necessity Is Needed filed before the Commission with prejudice. In support of said motion, the Applicant filed a petition for relief under Chapter 7 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of Tennessee, case number 23-10645, on May 24, 2023. Brian Glass, the duly appointed Chapter 7 Trustee, has been informed of this motion and has no objection to the relief sought herein.

Respectfully Submitted,

/s/ STEVEN L. LEFKOVITZ
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Bankruptcy Counsel for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on this the 14th day of August, 2023, the foregoing document was served on the following persons via U.S. Mail, Postage Prepaid: John A. Beam, III, Equitus Law Alliance, PLLc, P.O. Box 280240, Nashville, Tn 37208; Larry L. Cash and Mark W. Smith; Miller & Martin PLLc, 832 Georgia Avenue, Suite 1200, Chattanooga, Tennessee 37402; Henry Walker and Austin McMullen, Bradley Arant Boult Cummings, LLP, 1600 Division Street, Suite 700, Nashville, Tn 37203; Kimberly Bolton, Office Of The General Counsel; Tennessee Valley Authority, 400 West Summit Hill Drive; Knoxville, Tn 37902-1401; Jeremy L. Elrod, Tennessee Municipal Electric Power Association, 212 Overlook Circle, Suite 205, Brentwood, Tn 37027; W. Brantley Phillips, Jr. and Matthew J. Sinbeck, Bass Berry and Sims, 150 3rd Avenue North, Nashville, Tn 37201.

/s/Steven L. Lefkovitz