

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

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

MOTION FOR EXTENSION OF TIME


COMES NOW the Petitioner Jackson Sustainability Cooperative, by and through Counsel, and moves the Hearing Officer and the Commission for an additional ten (10) days to file a response and/or amend its petition in response to the Intervening Petitions and Statements submitted in this matter pursuant to Tennessee Public Utility Commission rule 1220-01-02-.06.

On May 24, 2021, Petitioner Jackson Sustainability Cooperative filed a petition seeking a declaratory instruction on the application of Tennessee statutes to its proposed solar facility in Jackson, Tennessee. On June 10, 2021, the Hearing Officer set a deadline for intervening petitions. Jackson Energy Authority, Tennessee Valley Authority, Tennessee Municipal Electric Power Association, and Tennessee Electric Cooperative Association filed petitions to intervene and/or statements. The purpose of this motion is to allow additional time to address the issues presented by the intervening parties with the objective of narrowing the issues before the Commission.

Petitioner Jackson Energy Authority has acted diligently in requesting this short extension. Equally important, the possible prejudice to the other parties is minimal in granting a short extension.

WHEREFORE, Petitioner Jackson Sustainability Cooperative requests the Hearing Officer to allow an additional ten (10) days for the Petitioner to file a response and/or amend its petition in response to the Intervening Petitions and Statements submitted in this matter.

Respectfully submitted,



John A. Beam, III, BPR #11796
EQUITUS LAW ALLIANCE, PLLC
709 Taylor Street
P.O. Box 280240
Nashville, Tennessee 37228
Telephone: (615) 251-3131
Facsimile: (615) 252-6404
Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of July, 2021, I electronically filed a true and correct copy of the foregoing with the Tennessee Public Utility Commission which will automatically send email notification of such filing to the following intervening parties, and I emailed and sent by U.S. mail copies to the following parties:

Henry Walker (BPR No. 000272)
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203
615-252-2363
hwalker@bradley.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
kboulton@tva.gov

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

David Callis
Executive Vice President and General Manager
Tennessee Electric Cooperative Association
2964 Sidco Drive
Nashville, TN 37204
(615) 515-5533
dcallis@tnelectric.org

Mark W. Smith (BPR No. 16908)
Miller & Martin PLLC
832 Georgia Avenue, Suite 1200
Chattanooga, TN 37402
(423) 756-6600
mark.smith@millermartin.com

Teresa Cobb, General counsel
P.O. Box 68
Jackson, TN 38302
(731) 422-7500
tcobb@jaxenergy.com

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



John A. Beam, III