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Chairman Kenneth C. Hill  
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Docket & Records Manager  
Tennessee Public Utility Commission  
Andrew Jackson State Office Building  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243-0001

RE: Application of Jackson Sustainability Cooperative for a Determination of  
Exemption and in the Alternative, for a Certificate of Public Convenience and  
Necessity – Docket No. 21-00061

Dear Ms. Lawless,

Enclosed is a Request for Status Conference filed on behalf of the Respondents, Jackson Energy Authority, Tennessee Electric Cooperative Association, Tennessee Valley Authority and the Tennessee Municipal Electric Power Association which we would appreciate your filing.

We are submitting an email copy as well and our copying all counsel with this correspondence. Thank you for your assistance.

Sincerely,

Larry L. Cash

LLC/dac

Enclosure

cc: All Counsel of Record

**BEFORE THE  
TENNESSEE PUBLIC UTILITY COMMISSION**

**NASHVILLE, TENNESSEE**

<b>THE APPLICATION OF JACKSON</b>	)	
<b>SUSTAINABILITY COOPERATIVE</b>	)	
<b>FOR A DETERMINATION OF</b>	)	
<b>EXEMPTION AND IN THE</b>	)	Docket No. 21-00061
<b>ALTERNATIVE, FOR A CERTIFICATE</b>	)	
<b>OF PUBLIC CONVENIENCE AND</b>	)	
<b>NECESSITY</b>	)	

**REQUEST FOR STATUS CONFERENCE**

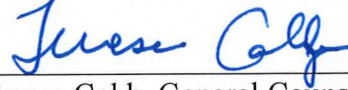
Come the Respondents, Jackson Energy Authority (“JEA”), Tennessee Electric Cooperative Association (“TECA”), Tennessee Valley Authority (“TVA”) and the Tennessee Municipal Electric Power Association (“TMEPA”) (collectively “Respondents”) and request a status conference in the above-referenced matter. In support of the Request, Respondents state that they received JSC’s discovery responses on Wednesday, September 22, 2021, and are still reviewing and evaluating those responses. Surprisingly, at least to Respondents, included in the discovery responses was additional Pre-filed testimony (called Direct Testimony of Dennis Emberling, Part II), that is new and additional testimony of greater length than the original Pre-filed testimony that was included with the original Petition. Additionally, respondents believe that there are a number of discovery Answers which are non-responsive, and the additional Pre-filed testimony raises new and additional issues.

Topics for discussion in the proposed status conference include, but are not limited to, discovery issues, responses to the new Pre-filed testimony and amendments to the procedural schedule. Respondents will seek to meet and confer with JSC about the discovery disputes as soon as practicable. In light of the fact that intervenors’ pre-filed testimony is due on October 4.

Respondents ask that a status conference be scheduled for mid or late next week to discuss potential modifications to the procedural schedule.

Respectfully submitted September 24, 2021.

**JACKSON ENERGY AUTHORITY**



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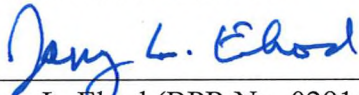
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2021, 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:

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