

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE TENNESSEE**

IN RE:)	
)	
COMPLAINT AND PETITION AGAINST)	
INTEGRATED RESOURCE)	
MANAGEMENT, INC. FOR ALLEGED)	DOCKET NO. 24-00051
VIOLATIONS OF THE STATUTES AND)	
RULES REGULATING CYBERSECURITY)	
PLANS AND REPORTING)	

PRE-FILED DIRECT TESTIMONY OF JERRY KETTLES

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Jerry Kettles. My business address is 502 Deaderick Street, 4th Floor, Nashville, Tennessee.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Tennessee Public Utility Commission. I am the Director of Economic Analysis.

Q. DO YOUR RESPONSIBILITIES AT THE TENNESSEE PUBLIC UTILITY COMMISSION INCLUDE DUTIES RELATED TO CYBERSECURITY PLAN FILINGS?

A. Yes. I am the repositior for the filings required by Tenn. Code Ann. § 65-4-107 and Commission Rule 1220-04-15-.04. I ensure that regulated utilities have submitted the annual filing required by law. Where a regulated utility has not timely submitted the annual filing. I make contact with Company representatives in an attempt to obtain compliance.

Q. IN THE COURSE OF YOUR DUTIES RELATED TO CYBERSECURITY PLAN FILINGS, HAVE YOU HAD ANY INTERACTIONS WITH INTEGRATED RESOURCE MANAGEMENT, LLC d/b/a IRM UTILITY, LLC (“IRM”)?

A. Yes. IRM did not submit the required annual filing relating to its cybersecurity plan on or before July 1, 2024 as required. I have attempted to reach Company representatives by telephone and email to let the Company know that the Commission had not received its annual cybersecurity filing. I spoke with Marian Cox, a Company representative concerning the cybersecurity filing on July 24, 2024.

Q. WHAT, IF ANYTHING, HAS BEEN THE RESPONSE FROM IRM?

A. IRM has not responded to requests to submit its annual cybersecurity plan filing.

Q. HAS IRM COMPLIED WITH THE ANNUAL REQUIREMENT TO FILE INFORMATION CONCERNING ITS CYBERSECURITY PLAN?

A. No. The Tennessee Public Utility Commission has not received any documentation from IRM that would satisfy its annual cybersecurity plan filing requirement.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes

STATE OF TENNESSEE)

COUNTY OF DAVIDSION)

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Jerry Kettles, being by me first duly sworn and deposed and said that:

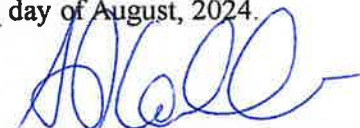
He is appearing as a witness on behalf of the Tennessee Public Utility Commission before the Tennessee Public Utility Commission, and if present before the Commission and duly sworn, his testimony would be as set forth in his pre-filed testimony in this matter.



Jerry Kettles

Sworn to and subscribed before me this 30th day of August, 2024.





Notary Public
My Commission Expires: 10/16/2027