DOCKET NO: 2021-AD-19

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSIONS. PUBLIC SERVICE

ORDER ESTABLISHING

FEB 02 2021

COMMISSION

COMMISSION REVIEW THE EFFICACY AND FAIRNESS OF THE NET METERING AND INTERCONNECTION RULES

MOTION TO INTERVENE

COMES NOW the City of Jackson, Mississippi and hereby files this Motion to Intervene in the above-styled proceeding. In support thereof, the City of Jackson, Mississippi states as follows:

- 1. The City of Jackson, Mississippi (hereinafter Jackson) is a municipal corporation existing as a political subdivision of the State of Mississippi.
- 2. Jackson is the largest municipality in the State of Mississippi and serves as Mississippi's capitol. Jackson is particularly interested in this proceeding because proposed changes in the rules would encourage its citizens to augment their energy sources with clean, renewable sources of power that could result in a lower cost of energy to citizens, particularly low-income citizens. Jackson is also particularly interested in the jobs that a change in the rules would generate for its citizens by increasing the demand for clean, renewable technologies that are currently being produced within the City. Finally, Jackson, as a large municipality, which operates numerous facilities within its municipal limits that use electricity, is particularly interested in pursuing clean energy solutions for its energy needs that will be cost-effective and reduce its carbon footprint. Virtual net metering would make these solutions more affordable to Jackson.
- 3. The name and address of the attorneys who are authorized to accept service of filings on behalf of the City of Jackson in this proceeding are:

Timothy Howard, City Attorney Terrell S. Williamson, Legal Counsel Office of the City Attorney 455 East Capitol Street Post Office Box 2779 Jackson, Mississippi 39207-2779 601/960-1799 (office) 601/960-1756 (facsimile) timhoward@jacksonms.gov twilliamson@jacksonms.gov

4. Jackson requests intervention as a full party, including the right to present testimony and exhibits, and to cross-examine witnesses. Jackson has a substantial interest relating to the proceeding at issue and is so situated that the disposition of the proceeding may as a practical matter impair or impede its ability to protect that interest. The granting of this motion will not substantially delay the proceedings in this matter.

WHEREFORE, PREMISES CONSIDERED, Jackson respectfully requests that Commission enter an Order granting Jackson's Motion to Intervene and allowing Jackson to become a full party of record in the above-styled proceeding.

Respectfully submitted this the 2d day of February, 2021.

CITY OF JACKSON, MISSISSIPPI

BY: /s Terrell S. Williamson
Terrell S. Williamson
One of Its Attorneys

OF COUNSEL:

Timothy Howard, Esq.
(Miss. Bar No. 10687)
City Attorney for the City of Jackson, Mississippi Terrell S. Williamson, Esq.
(Miss. Bar No. 8639)
OFFICE OF THE CITY ATTORNEY
455 East Capitol Street
Post Office Box 2779
Jackson, Mississippi 39207-2779
601/960-1799 (office)
601/960-1756 (facsimile)

CERTIFICATE OF SERVICES

I, Terrell S. Williamson, one of the counsel of record for the City of Jackson, Mississippi do hereby certify that in compliance with RP 6.121(2) of the Public Utilities Rules of Practice and Procedure and in compliance with the Commission's March 12, 2020 ORDER TEMPORARILY SUSPENDING RULES AND ENCOURAGING USE OF THE COMMISSION'S ELECTRONIC FILING SYSTEMS:

- (1) An electronic copy of the Motion to Intervene has been filed with the Commission via email at the address designed by the Commission for electronic filing, efile.psc@psc.state.ms.us;
- (2) An electronic copy of the Motion to Intervene has been served to the following persons designated to receive filings at the following addresses:

Katherine Collier

<u>executive.secretary@psc.ms.gov;</u>
<u>katherine.collier@psc.state.ms.us</u>

Sally Doty

Shawn S. Shurden

<u>executive.secretary@psc.ms.gov;</u>
<u>katherine.collier@psc.state.ms.us</u>

<u>sally.doty@mpus.ms.gov</u>

<u>ssshurde@southernco.com</u>

Shawn S. Shurden ssshurde@southernco.com
Bryan W. Estes chipestes@gmail.com
Hart Martin hart.martin@ago.ms.gov

Stephen B. Jacksonsjackson@cooperativeenergy.comAlan Wilsonawilson@cooperativeenergy.comRyan Burrageryan.burrage@entegritypartners.com

Robert Wiygul <u>robert@wwglaw.com</u>

Beth L. Orlansky <u>borlansky@mscenterforjustice.org</u>

Randy E. Carroll

Kacey Guy Baily

Stephen Wright

Larry D. Moffett

Paul Purnell

Rearroll@EMEPA.com

kacey@gloveryoung.com

swright@gsreia.org

larry@larrymoffett.com

purnell@ecm.coop

Paul Purnell

Paul Purnell

Hunter Walters

Elizabeth Galante

Jeremy C. Vanderloo

Tianna H. Raby

Alexander C. Martin, II

Alicia S. Hall

Alicia S. Hall

Purnell@ecm.coop

walters@ecm.coop

bgalante@posigen.com

jvandel@entergy.com

traby@entergy.com

amart12@entergy.com

ahall4@entergy.com

Caleb Dana <u>mssolarenergysociety@gmail.com</u>

Jason B. Keyesjkeyes@keyesfox.comRobert P. Wiserwise@sharpewise.com

This the 2d day of February, 2021.

By: /s Terrell S. Williamson
Terrell S. Williamson
OFFICE OF THE CITY ATTORNEY
455 East Capitol Street
Post Office Box 2779
Jackson, Mississippi 39207-2779
601/960-1799 (office)
601/960-1756 (facsimile)
twilliamson@jacksonms.gov