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January 8, 2021

**FILED**

**JAN 08 2021**

**MISS. PUBLIC SERVICE  
COMMISSION**

Katherine Collier, Esq.  
Executive Secretary  
Mississippi Public Service Commission  
501 North West Street, Suite 201A  
Jackson, MS 39201  
katherine.collier@psc.ms.gov

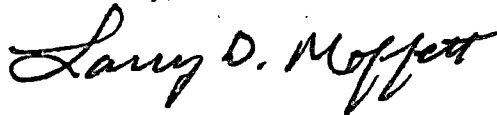
RE: Motion of Central Electric Power Association to Intervene  
Docket Number 2020-UA-211

Dear Ms. Collier:

On behalf of Central Electric Power Association, please find the attached Motion to Intervene along with a proposed Order granting same. Pursuant to the Commission's Order of March 12, 2020, this filing is only being made electronically. Physical copies shall be provided as may be required by further order of the Commission.

Thank you for your assistance.

Sincerely,



Larry D. Moffett

Cc: Sally Birchfield Doty, Esq. ([sally.doty@mpus.ms.gov](mailto:sally.doty@mpus.ms.gov))  
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FILED

JAN 08 2021

MISS. PUBLIC SERVICE  
COMMISSION

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

PEARL RIVER SOLAR PARK LLC

DOCKET NO. 2020-UA-211

IN RE: PETITION OF PEARL RIVER SOLAR PARK LLC FOR A CERTIFICATE  
OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING  
CONSTRUCTION, OWNERSHIP, AND OPERATION OF A SOLAR  
ELECTRIC GENERATING FACILITY IN SCOTT COUNTY, MISSISSIPPI

**MOTION OF CENTRAL ELECTRIC POWER ASSOCIATION TO INTERVENE**

COMES NOW Central Electric Power Association (“Central”), Identification Number EA-103-0035-00, by and through counsel, and pursuant to Rule 6(121) of the Public Utilities Rules of Practice and Procedure, files this motion to intervene in the above referenced matter, and in support thereof would show unto the Mississippi Public Service Commission (“Commission”) the following:

1. Central is a member-owned corporation formed and operating on a not-for-profit basis under Mississippi’s Electric Power Association Law, Miss. Code Ann. §§77-5-201, *et seq.* (“EPA Act”). Central owns and operates equipment and facilities for the distribution of electricity; is a “public utility” under the Mississippi Public Utilities Act, §§77-3-1, *et seq.*, (“the Public Utilities Act”); and is subject to the jurisdiction of the Commission as and to the extent set forth in the Public Utilities Act and the EPA Act. Central provides -- and is exclusively entitled to provide -- electricity to the public within those certain geographic areas that are described in certificates of public convenience and necessity issued by the Commission to Central.

2. Central has a substantial interest relating to the property, transaction or outcome of this proceeding and is so situated that the disposition of the proceeding may as a practical matter impair or impede Central’s ability to protect that interest. Thus, Central asks for

permission to intervene and to be given the status of a party and to participate as a party, subject to any conditions as may be prescribed by the Commission.

5. Pearl River Solar Park LLC (“PRSP”) filed its Petition with the Commission on or about December 23, 2020, seeking a certificate of public convenience and necessity for the construction, ownership, and operation of a solar electric generating facility (“Subject Facility”) in Scott County, Mississippi. PRSP’s Petition states that the Subject Facility is to be located on a total of 1,760 acres generally located in Sections 13, 24, and 25 of Township 8 North, Range 5 East, and Section 19, 30, and 31 of Township 8 North, Range 6 East of Scott County (“Facility Site”).

6. The Facility Site is in Central’s certificated service area, and the Subject Facility, if constructed, will be in Central’s certificated service area. Central has the exclusive right to provide electric service within its certificated service area. Section 77-3-12(1), Miss. Code Ann.

7. Central takes no position on the merits of the relief requested by PRSP except to the extent as may be necessary for the protection of Central’s rights under its area certificates. Specifically, to the extent electricity from other sources will be needed for the construction and/or operation of the Subject Facility, Central has the exclusive right to furnish and provide such electricity. In considering the relief requested by PRSP, the Commission must ensure that Central’s rights are protected, and the Commission should, among other things, require PRSP to demonstrate and affirm that PRSP will honor, uphold, and protect Central’s right to be the exclusive provider of electricity to the Facility Site and the Subject Facility.

8. This motion has been filed with the Commission within twenty (20) days from the date of the filing of PRSP’s Petition as required by Rule 6(121)(3) of the Public Utilities Rules of Practice and Procedure.

9. Service on Central in this proceeding should be made to the following:

Larry D. Moffett, Esq.  
Law Office of Larry D. Moffett, PLLC  
P.O. Box 1418  
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and

Paul Purnell, Esq.  
Attorney at Law  
Electric Cooperatives of Mississippi  
P.O. Box 3300  
Ridgeland, MS 39158-3300  
601-605-8600  
[purnell@ecm.coop](mailto:purnell@ecm.coop)

and

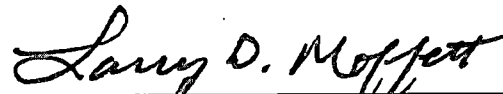
Hunter Walters, Esq.  
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Ridgeland, MS 39158-3300  
601-605-8600  
[walters@ecm.coop](mailto:walters@ecm.coop)

10. A proposed order granting this motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Central Electric Power Association respectfully requests that the Commission grant its Motion to Intervene and that Central Electric Power Association receive such other or additional relief as may be appropriate in the premises.

Respectfully submitted, this 8th day of January 2021.

Central Electric Power Association



By: Larry D. Moffett (MSB 3401)

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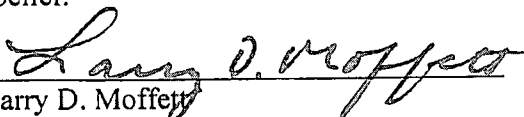
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STATE OF MISSISSIPPI

COUNTY OF LAFAYETTE

Personally appeared before me the undersigned notary public, the within named Larry D. Moffett, who after first being duly sworn by me deposed and stated that he is Attorney for Central Electric Power Association and that for and on behalf of Central Electric Power Association and as its act and deed, he signed the above and foregoing motion, after first having been duly authorized to do so, and that the factual statements in the motion are true and correct to the best of his knowledge, information and belief.

  
Larry D. Moffett  
Attorney for Central Electric Power Association

SWORN TO AND SUBSCRIBED before me on this the 8th day of January 2021.

Kattie Rush  
NOTARY PUBLIC

My Commission Expires:

April 6, 2021

(S E A L)



CERTIFICATE OF SERVICE

I, the undersigned, Larry D. Moffett, do hereby certify that in compliance with RP 6 of the Mississippi Public Service Commission Public Utilities Rules of Practice and Procedure, as modified and suspended by that certain Order Temporarily Suspending Rules and Encouraging Use of the Commission Electronic Filing System issued on March 12, 2020:

(1) An electronic copy of the Motion has been filed with the Commission via e-mail to:

Katherine Collier, Esq.  
Executive Secretary  
Mississippi Public Service Commission  
501 North West Street, Suite 201A  
Jackson, MS 39201  
[katherine.collier@psc.ms.gov](mailto:katherine.collier@psc.ms.gov)

(2) An electronic copy of the Motion has been filed with the Mississippi Public Utilities Staff via email to:

Sally Doty, Esq.  
Executive Director  
Mississippi Public Utilities Staff  
501 North West Street, Suite 301B  
Jackson, MS 39201  
[sally.doty@mpus.ms.gov](mailto:sally.doty@mpus.ms.gov)

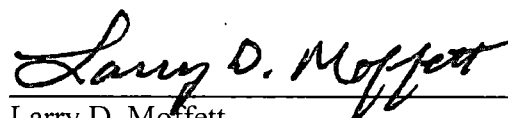
(3) An electronic copy of the Motion has been filed with the Commission via e-mail to the following address: [efile.psc.@psc.state.ms.us](mailto:efile.psc.@psc.state.ms.us)

(4) An electronic copy of the Motion has been served via e-mail on counsel for the Petitioner as follows:

Ricky J. Cox  
Leo E. Manuel  
Mary-Katherine Black  
Balch & Bingham LLP  
1310 Twenty Fifth Avenue  
P.O. Box 130  
Gulfport, MS 39502-0130  
[rcox@balch.com](mailto:rcox@balch.com)  
[lmanuel@balch.com](mailto:lmanuel@balch.com)  
[mblack@balch.com](mailto:mblack@balch.com)

(5) Movant has, to the undersigned's knowledge and belief, complied with all other requirements of the Mississippi Public Service Commission's Public Utilities Rules of Practice and Procedure regarding the filing and service of the Motion.

This, the 8th day of January 2021.

  
\_\_\_\_\_  
Larry D. Moffett