

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA**

GEORGIA POWER COMPANY and)	
SOUTHWIRE COMPANY, LLC,)	
)	
Petitioners,)	
)	
v.)	Docket No. 38275
)	
CARROLL ELECTRIC MEMBERSHIP)	
CORPORATION,)	
)	
Respondent.)	

**CARROLL ELECTRIC MEMBERSHIP CORPORATION’S RESPONSE TO
REQUEST OF PETITIONERS FOR EVIDENTIARY HEARING AND
CARROLL ELECTRIC MEMBERSHIP CORPORATION’S
REQUEST FOR PERMISSION TO PURSUE DISCOVERY**

Respondent Carroll Electric Membership Corporation (“Carroll EMC”) continues to assert the exclusive right pursuant to the Georgia Territorial Electric Service Act, O.C.G.A. §§ 46-3-1 through 46-3-15 (the “Territorial Act”), and more specifically O.C.G.A. § 46-3-8(b), to continue serving the manufacturing facility recently purchased by Southwire Company, LLC (“Southwire”) at 5152 Columbia Drive, Carrolton, Georgia. Because the Petitioners Georgia Power Company (“Georgia Power”) and Southwire failed to provide allegations in their Petition that would show otherwise even if true, Carroll EMC filed a motion asking the Commission to either dismiss the matter or, alternatively, to summarily decide the matter in favor of Carroll EMC.

In response, Petitioners filed their Request for Evidentiary Hearing and Opposition to Motion to Dismiss or, in the Alternative, for Summary Disposition, in which they provided more allegations which they claim are the bases for their argument that Southwire should qualify for

the large load customer choice provision of the Territorial Act, O.C.G.A. § 46-3-8(a)(5), as an exception to O.C.G.A. § 46-3-8(b). Carroll EMC disagrees with their conclusion, but acknowledges that their allegations and supporting affidavits provide a sufficient basis for the Commission to schedule a hearing on this matter.

Such a hearing will provide the opportunity for Carroll EMC to respond in detail to the specifics presented by Petitioners, and therefore Carroll EMC will not unnecessarily burden the record with such detail in this response, and in fact Carroll EMC can only fully respond after pursuing appropriate discovery regarding Petitioners' allegations. However, it is worthwhile at this point to note broadly a few of Petitioners' more egregious errors and omissions:

- There is no precedent in Georgia to distinguish between differing classes of “light” or “heavy” manufacturing facilities with respect to determining electric service rights under the Territorial Act.
- Utility providers' different available rates are not relevant to whether or not the Territorial Act grants one of those utility providers the exclusive right to serve a certain premises. However, it is incorrect to describe Carroll EMC's LP-3 Large Power Service as an “interruptible” rate. Affidavit of Jerome Johnston, attached hereto, ¶ 4.
- Despite Petitioners' lists of changes being made by Southwire to the Old Sony Plant, “larger, more modern and more elaborate replacement facilities of similar function and classification have generally been ruled by the Commission to be ‘in substantial kind’ with previous facilities and not to be new premises.” Diverse Power v. City of LaGrange, Docket No. 13392-U (Final Order, December 4, 2003), at p. 5, citing Colquitt EMC v. Georgia Power Company, Docket No. 12528-U (Initial Decision, January 18, 2002); North Georgia EMC v. City of Dalton, Docket No. 3941-U (Initial Decision, June 21,

1991); Georgia Power Company v. Middle Georgia EMC, Docket No. 3826-U (Initial Decision, May 16, 1989); Central Georgia EMC v. Georgia Power Company, Docket No. 3692-U (Initial Decision, May 9, 1988).

- Carroll EMC never agreed to provide Southwire's North Campus premises with only "interim" service. Affidavit of Jerome Johnston ¶ 5.
- Through its employees' statements and extensive otherwise unnecessary construction activity, Petitioner Georgia Power has both expressed and demonstrated its intention to begin providing so-called "temporary" electric service to Southwire's North Campus in the immediate future – prior to any ruling by the Commission on this matter. Affidavit of Jerome Johnston ¶¶ 6 - 8. Moreover, Southwire, without waiting for the hearing Petitioners themselves requested, has now asked Carroll EMC to disconnect service to the North Campus on May 31, a request Carroll EMC naturally declined. Affidavit of Jerome Johnston ¶ 9. Such actions show Petitioners' disregard both for this proceeding in which they asked the Commission to determine the parties' rights under the Territorial Act and for Southwire's contractual relationship with Carroll EMC. Petitioners filed this action asking the Commission to exercise its equitable jurisdiction, but they appear to be doing so with remarkably unclean hands.

The burden at a hearing will be on the Petitioners to show why O.C.G.A. § 46-3-8(b) is not dispositive and Southwire's contract with Carroll EMC should be set aside, and it is clear from their allegations and affidavits that they will attempt to do so by asserting Southwire's North Campus is not "in substantial kind" with the Old Sony Plant. Therefore, prior to a hearing on this matter, Carroll EMC respectfully requests permission to pursue discovery concerning such relevant facts as, for example, Petitioners' architectural and engineering plans and

drawings, actual and projected costs, and all contracts and communications between Petitioners with respect to the commencement of electric service by Georgia Power and related construction. In addition, to the extent Georgia Power and Southwire continue on their current course and Georgia Power provides any retail electric service to Southwire before the Commission has made a ruling in this matter, Carroll EMC will be forced to ask for a cease and desist order to protect Carroll EMC's existing territorial rights and current contract with Southwire pending the final determination of this matter.

WHEREFORE, Carroll EMC respectfully requests that the Commission set the matter for an evidentiary hearing and permit the Parties to engage in relevant pre-hearing discovery.

Respectfully submitted this 27th day of May, 2014.



G. Mark Cole
Georgia Bar No. 176522
Autry, Cole, Hanrahan, Hall & Cook, LLP
2100 East Exchange Place, Suite 210
Tucker, GA 30084
Telephone: (770) 270-6974
Facsimile: (770) 270-6970
Email: cole@ahclaw.com

ATTORNEYS FOR CARROLL ELECTRIC
MEMBERSHIP CORPORATION

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA**

GEORGIA POWER COMPANY and)	
SOUTHWIRE COMPANY, LLC,)	
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Petitioners,)	
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v.)	Docket No. 38275
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CARROLL ELECTRIC MEMBERSHIP)	
CORPORATION,)	
)	
Respondent.)	

AFFIDAVIT OF JEROME JOHNSTON

PERSONALLY APPEARED before the undersigned officer duly authorized by law to administer oaths, Jerome Johnston, who, after being duly sworn and deposed, freely and voluntarily, states as follows:

1.

I am over eighteen years of age and am competent to give this Affidavit.

2.

I give this Affidavit for use in support of Carroll Electric Membership Corporation's Response to Request of Petitioners Southwire Company, LLC ("Southwire") and Georgia Power Company ("Georgia Power") for Evidentiary Hearing in the above-captioned matter and for any other purposes allowed by law.

3.

I currently serve as the Interim Chief Executive Office of Carroll Electric Membership Corporation ("Carroll EMC"). This Affidavit is based upon my personal knowledge regarding Carroll EMC, its membership policies, and its history of service to the premises known formerly as "the Old Sony Plant" and currently as Southwire's North Campus.

4.

Carroll EMC's LP-3 Large Power Service is not an "interruptible" rate, although it does allow customers the option to curtail load during load management hours and achieve annual savings.

5.

Contrary to any implication otherwise, Carroll EMC never agreed to provide only "interim" power to Southwire at the Old Sony Plant, although we understood when Southwire requested service that Southwire wished to assert that customer choice was applicable. With respect to the exclusivity and permanence of electric service, Carroll EMC's service agreement and related public terms and conditions that apply to Southwire's North Campus are the same as those Southwire has long agreed to for its other facilities served by Carroll EMC: Southwire is contractually obligated to purchase all the retail electricity for its North Campus from Carroll EMC unless the Public Service Commission determines otherwise.

6.

Carroll EMC employees have been verbally informed by Georgia Power personnel that Georgia Power intends to begin providing "temporary" electric service to Southwire's North Campus, but we have no confirmation that such service has begun as of the date of this affidavit. However, beginning no later than the first week of May of 2014, Georgia Power contract crews began constructing new lines either above or below ground that partially run parallel to Carroll EMC's lines as shown on accompanying exhibits A and B. At one location, these new lines have been constructed so close to Carroll EMC's facilities that safety standards have been violated. By May 15, Georgia Power had connected to duplicative service entrance cables that run into the existing Southwire building in parallel with Carroll EMC's service to the facility, as shown on accompanying exhibit C.

7.

Carroll EMC is not aware of the cost of these new Georgia Power lines nor of any existing contractual agreement between Georgia Power and Carroll EMC's customer, Southwire, with respect to either the responsibility to pay for the newly constructed lines or the rate at which Georgia Power will provide power to Southwire. However, Carroll EMC is aware from observations and taking field measurements that Georgia Power is upgrading approximately 2,700 feet of existing 12 kV three phase distribution line and is constructing approximately 5,100 feet of new 12 kV three phase distribution line to the Old Sony Plant, none of which would be of use to Georgia Power so long as Carroll EMC continues to serve those premises. In addition, Carroll EMC is aware of a requested substation capacity increase to be effective June 1, 2014 made by Georgia Power to Georgia Transmission Corporation per the attached correspondence labeled as exhibit D.

8.

None of the Georgia Power or Carroll EMC lines referenced above in paragraphs 6 and 7 are connected to Southwire's proposed new switchyard. Nor is there any apparent reason the newly installed Georgia Power lines could any more easily be reconfigured than Carroll EMC's existing lines when Southwire desires such connections in the future. As Carroll EMC recently reminded Southwire as shown in the attached exhibit E, upon request from Southwire, Carroll EMC's lines can be redirected to the relocated connection point in just a few days.

9.

On May 22, 2014, Carroll EMC received the letter attached as Exhibit F from Southwire requesting that Carroll EMC disconnect service to the North Campus on May 31. Carroll EMC declined, noting both our existing contract that requires Southwire to purchase all retail electricity for the facility from Carroll EMC and the pendency of this matter.

10.

The above-stated facts are true and correct and based upon my personal knowledge.

FURTHER, AFFIANT SAYETH NOT.



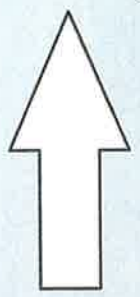
Name: Jerome Johnston
Interim Chief Executive Officer
CARROLL ELECTRIC MEMBERSHIP
CORPORATION

SWORN TO AND SUBSCRIBED
before me this 23rd day
of May, 2014.


Notary Public
My Commission Expires:



New Georgia
Power line
extension to
Southwire



Existing Carroll EMC
distribution pole



EXHIBIT
A

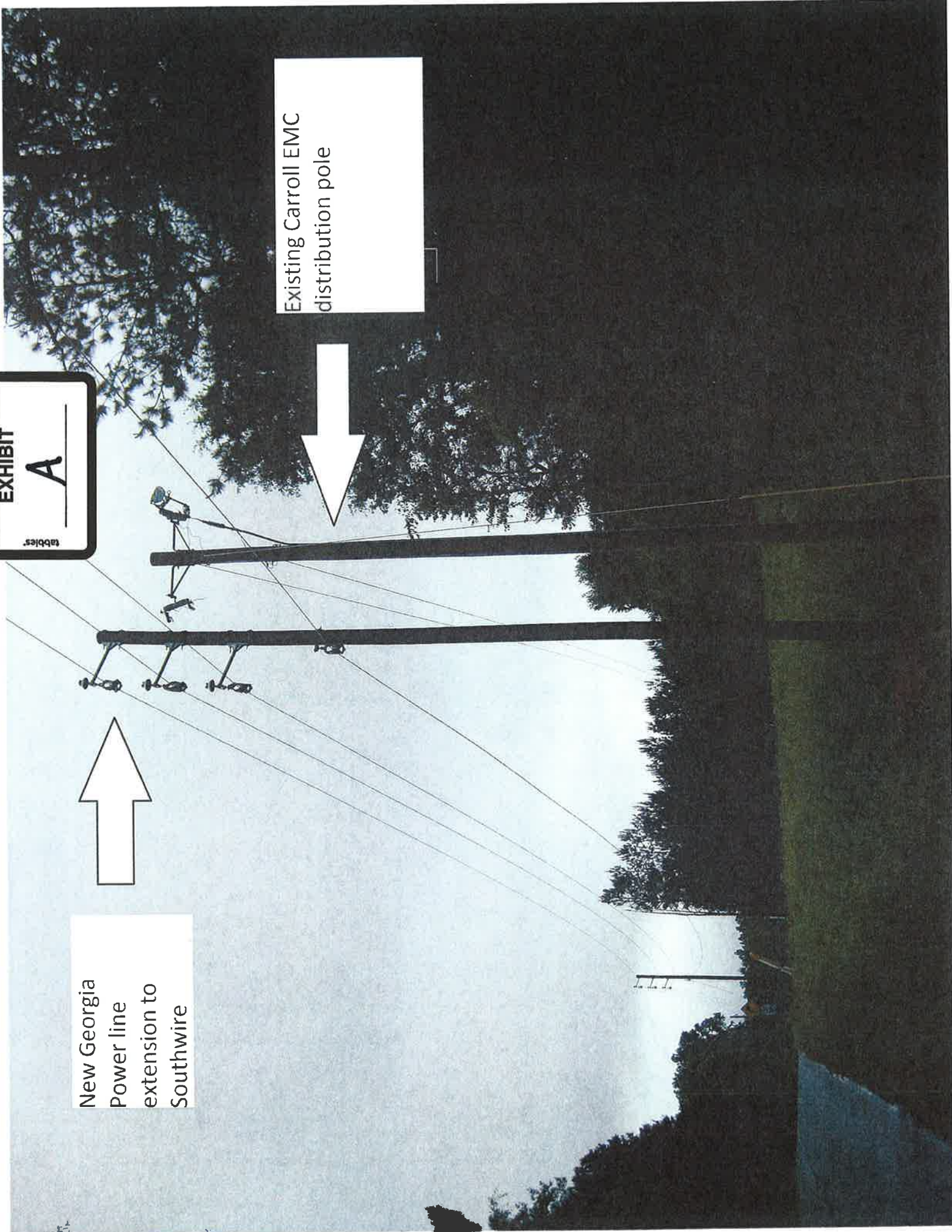
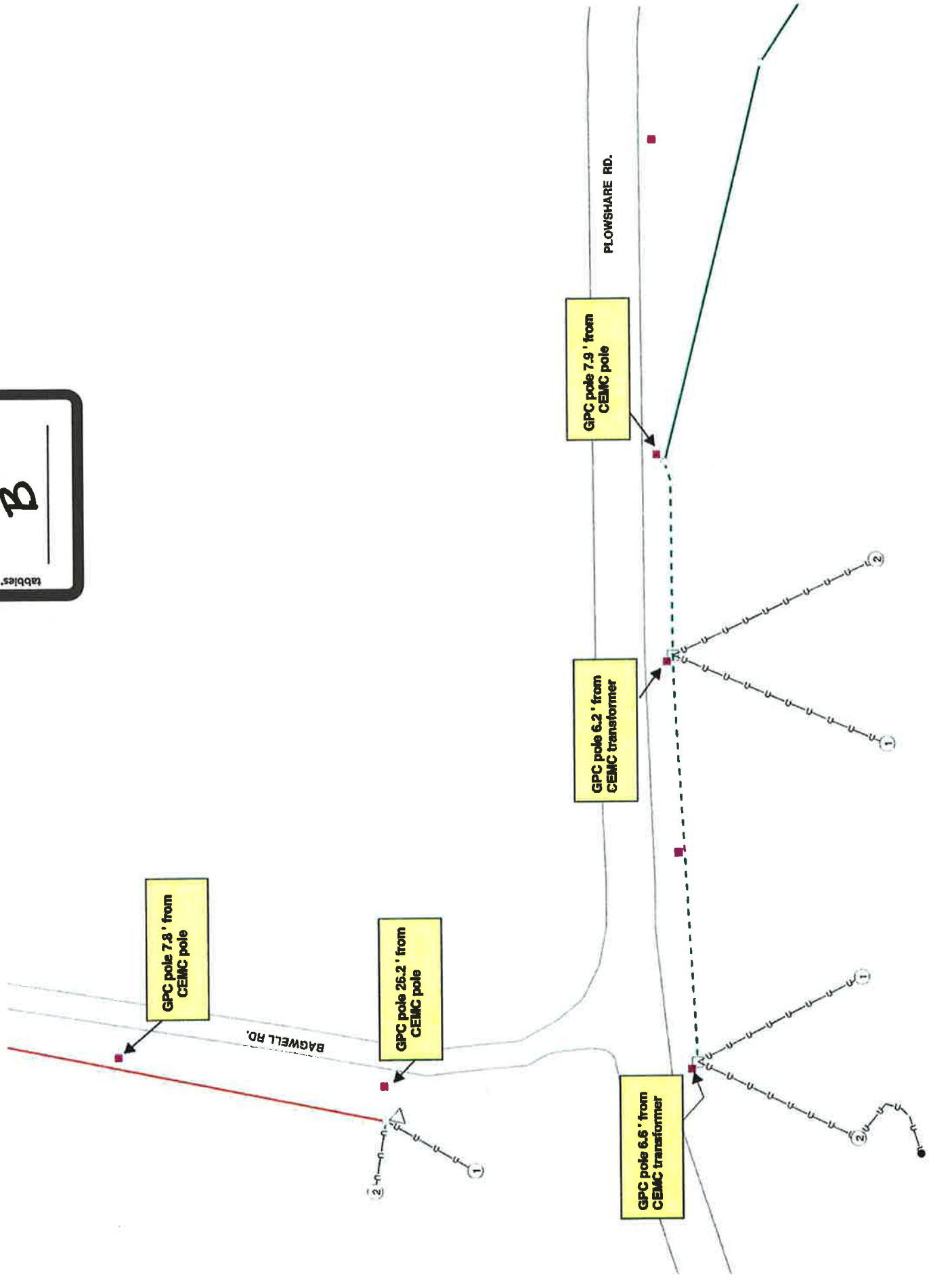
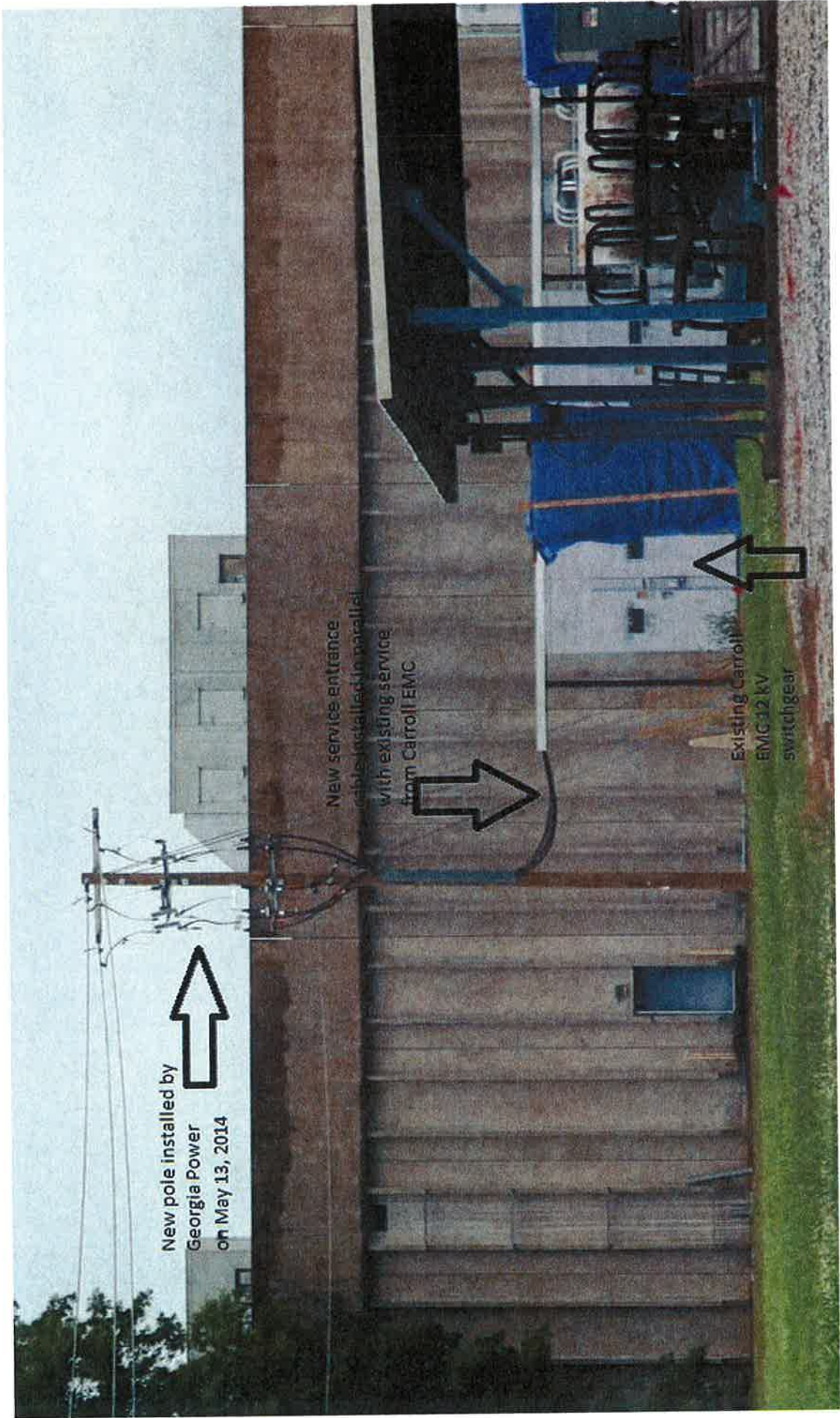
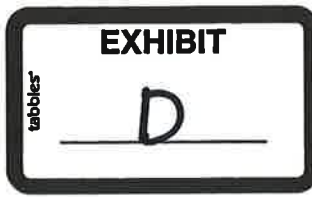


EXHIBIT
B
tabbles







County: CARROLL

Printed on: 05/21/2014

**Georgia Transmission Corporation
REQUEST FOR PROJECT ESTIMATE**

Planning Contact : ANNE MILLER
Project Manager : DAVID AKIN

Region: Northwest

Required Cut-In Date: 06/01/2014

GTC Projects:

P87447 Buck Creek(CARROLL EMC#014) 115kV/12kV Substation

Approved by _____ Date _____

Scopes:

P87447 Increase capacity from 32.9 MVA to 44.8 by replacing Bank B. Remove T-9607 115/12 kV 10.5 MVA. Add T-9758 115/12 kV 22.4 MVA. Per GPC PCD #6-14. GPC will perform the work under WAR #1-14.

Justification: The Buck Creek 115/12 kV Bank B is expected to exceed its 10.5 MVA top nameplate capacity in summer of 2014 with the addition of a new customer. GPC sent PCD #6-14 requesting GTC to increase capacity to 22.4 MVA by 6/1/14, utilizing T-9758 from the ITS Spare Pool. GTC sent WAR #1-14 to authorize GPC to perform the work.

The capacity increase will be classified as Exclusive Use DSF for GPC.

SUBSTATION PROJECT INFORMATION

Project Name: Buck Creek Met Pt #: CAR 014 Description: General Substation Modification
 Facility Owner: GEORGIA TRANSMISSION CORPORATION
 Forecast: \$350,434
 Area Project:
 Op H S KV: 115kV ITS Crit Proj: Yes Capacity Added: 22.40
 Op L S KV: 12kV Split Bus: No Capacity Removed: 10.50 Pro Type: AIM
 Land Req'd: No EMC Low Side: No Control House: No RTU: No
 Mobile Req'd: No Req'd ITS: 06/01/2014 PCD Required: No PCD Date:
 Bypass Metering: No JSTP Submittal: * DSF Only JSTP Cost Type: * Not Subject to Cost Overrun

Transformer ID	Action	Location	Amount
T-9607	RTD	Warehouse	0.00
T-9758	USD	ITS Spare Pool	0.00

ITS Member Feeder Information

of Feeders: 0 Regulator Size: 0
 Overhd/Undergrd: NA Oper. Voltage: NA

Load Projections:	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
EMC MVA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ITS MVA	9.90	12.90	12.90	11.00	11.50	12.00	12.50	12.50	12.50	12.50	12.50
Total:	9.90	12.90	12.90	11.00	11.50	12.00	12.50	12.50	12.50	12.50	12.50

**PROJECT COMMITMENT DOCUMENT with Distribution Service Facilities
ITS PARTICIPANTS (GPC, GTC, MEAG, DALTON)**

REQUESTER	WORK PERFORMER	Requester PCD # 6-14	
		Project #	Customer Choice
<input checked="" type="checkbox"/> GPC <input type="checkbox"/> MEAG <input type="checkbox"/> GTC <input type="checkbox"/> DALTON	<input type="checkbox"/> GPC <input type="checkbox"/> MEAG <input checked="" type="checkbox"/> GTC <input type="checkbox"/> DALTON	<input checked="" type="checkbox"/> Substation	<input type="checkbox"/> Line

FACILITY NAME & OWNER: Buck Creek 115/12 kV Substation (GTC)

PROJECT DESCRIPTION: See Attachments

Date Required: 6/1/2014

Work Description:

The Buck Creek 115/12kV Transformer Bank B is expected to exceed its 10.5MVA top nameplate capacity in Summer of 2014. GPC requests that Bank B-Co. #9607 be replaced by an available spare transformer, 22.4MVA-Co. #9758 as soon as possible but no later than 6/1/2014. GPC is willing to perform the work under a WAR if that will expedite this customer choice project.

Service Point Voltage: 12kV

2014 Monthly Maximum Demand in MVA:

<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>
7.9	9.9	10.5	10.9	10.9	11.9	11.9	12.9	12.9

Annual Maximum Demand in MVA:

<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
12.9	12.9	11.0	11.5	12.0	12.5

GTC intends to submit a Work Authorization Request to GPC to perform this work.

TYPE OF REQUEST:

- 1 - FACILITY OWNER TO INSTALL RLB SWITCH AT SERVICE POINT
 - 2 - FACILITY OWNER TO INSTALL STANDARD BREAKER AT SERVICE POINT:
 - 3 - FACILITY OWNER TO INSTALL BREAKER SPECIFIED BY REQUESTING PARTICIPANT AT SERVICE POINT
- QUANTITIES REQUESTED:**
- | | | |
|--|--|--|
| <input type="checkbox"/> 120/240 V AC
Fuse Size 20 A | <input type="checkbox"/> AT Status | <input type="checkbox"/> Control & Status via Hard Wire |
| <input type="checkbox"/> 125 V DC *
Fuse Size 30 A | <input type="checkbox"/> Bank Alarm | <input type="checkbox"/> Control & Status via Digital Communication Access to relay(Comlink) |
| <input type="checkbox"/> 3-PHASE 120 V AC
Refer to ITS Procedure #7 | <input type="checkbox"/> Relay Failure Alarm | <input type="checkbox"/> Wireless |
| <input type="checkbox"/> 100:5A RRM CT (RF=3) | <input type="checkbox"/> Bank Telemetry | <input type="checkbox"/> PCB Three - Phase Amps |
| <input type="checkbox"/> 14400:120V RRM PT | <input type="checkbox"/> Control & Status of PCB | <input type="checkbox"/> Low side Bus Voltage |
| | <input type="checkbox"/> Control & Status - PCB Tag SW | <input type="checkbox"/> Loss of Station Service |
| | <input type="checkbox"/> Control & Status - PCB G SW | <input type="checkbox"/> RRM Bypass Switches (Direct Cost to Requesting Participant) |
| | <input type="checkbox"/> Control & Status - PCB R SW | |

REQUESTER'S SIGNATURE / TITLE: John Chakiris, Principle Engineer/Area Planning **PHONE #:** 404-506-1218

APPROVED: Maryanne Mujica, ITS/Area Planning Manager 3/27/2014

REQUEST DATE: 4/4/2014 **RESPOND BY DATE:** 4/18/2014 **NEED DATE:** 6/1/2014

Requester will be responsible for all costs if not approved for inclusion in the ITS.

PCD ACCEPTANCE: ACCEPT / REJECT with Explanation:

APPROVAL (EXECUTIVE IF NEEDED)	SIGNATURE / JOB TITLE: <u>Anne Miller, Transmission Services Engineer</u> DATE: <u>4/21/2014</u>
	EXECUTIVE / JOB TITLE: _____ DATE: _____

Work Performer PCD #: _____ **Project #:** _____

WAR COORDINATOR CONTACT INFORMATION

Dalton EMAIL: warcoord@dutil.com	GPC EMAIL: warcoord@southernco.com
GTC EMAIL: warcoord@gatrans.com	MEAG EMAIL: warcoord@meagpower.org

**WORK AUTHORIZATION REQUEST
ITS PARTICIPANTS (GPC, GTC, MEAG, DALTON)**

REQUESTER	WORK PERFORMER	Requester WAR # 1-14PN
		Project # _____
<input type="checkbox"/> GPC <input type="checkbox"/> MEAG <input checked="" type="checkbox"/> GTC <input type="checkbox"/> DALTON	<input checked="" type="checkbox"/> GPC <input type="checkbox"/> MEAG <input type="checkbox"/> GTC <input type="checkbox"/> DALTON	<input type="checkbox"/> Emergency <input checked="" type="checkbox"/> Customer Choice <input type="checkbox"/> Non-Emergency

FACILITY NAME & OWNER: Buck Creek Substation (GTC)

PROJECT DESCRIPTION: See attachments

GTC requests GPC to increase the capacity of Bank B to 22.4 mVA utilizing CO #9578.

- GTC wants to review the GPC proposed one line diagram changes prior to detailed design proceeding.
- GTC wants to review the design drawings prior to the project being released for construction.
- GPC shall provide final as-built drawings back to GTC within 3 months after completion of construction.
- GPC shall bill GTC within 90 days of project completion.
- The Buck Creek electronic drawings will be placed on the ITS web site for GPC to utilize.
- The GTC contact for GPC is David Akin, 770-861-6122.

GPC shall comply with the attached "Terms and Conditions for Work Authorization Requests Issued by Georgia Transmission Corporation to Georgia Power Company". (The attached document includes the GPC formal reply to the "Buy American" clause – this documentation is sufficient for these installations.)

Ref: PCD # 6-14

PCD Work Description:

The Buck Creek 115/12kV Transformer Bank B is expected to exceed its 10.5MVA top nameplate capacity in Summer of 2014. GPC requests that Bank B-Co. #9607 be replaced by an available spare transformer, 22.4MVA-Co. #9758 as soon as possible but no later than 6/1/2014. GPC is willing to perform the work under a WAR if that will expedite this customer choice project.

REQUESTER'S SIGNATURE/TITLE: David Akin / Project Manager **PHONE #:** 770-861-6122

REQUEST DATE: 04/23/2014 **RESPOND BY DATE:** 05/08/2014 **NEED DATE:** 06/01/2014

WAR ACCEPTANCE: **ACCEPT** / **REJECT with Explanation :**

APPROVAL (EXECUTIVE IF NEEDED)	SIGNATURE / JOB TITLE: <u>Larry Robinson - Project Manager</u> DATE: <u>5/7/2014</u>
	EXECUTIVE / JOB TITLE: _____ DATE: _____

Work Performer WAR #: GTC PS #02-14 **Project #:** 1553401

Project Billing #: _____ **Cost Estimate (\$):** \$350,434

ESTIMATE APPROVAL: **ACCEPT** / **REJECT with Explanation :**

APPROVAL SIGNATURE / JOB TITLE: [Signature] VP, PS **DATE:** 5/14/14

PROJECT COMPLETION:

APPROVAL SIGNATURE / JOB TITLE: _____ **DATE:** _____

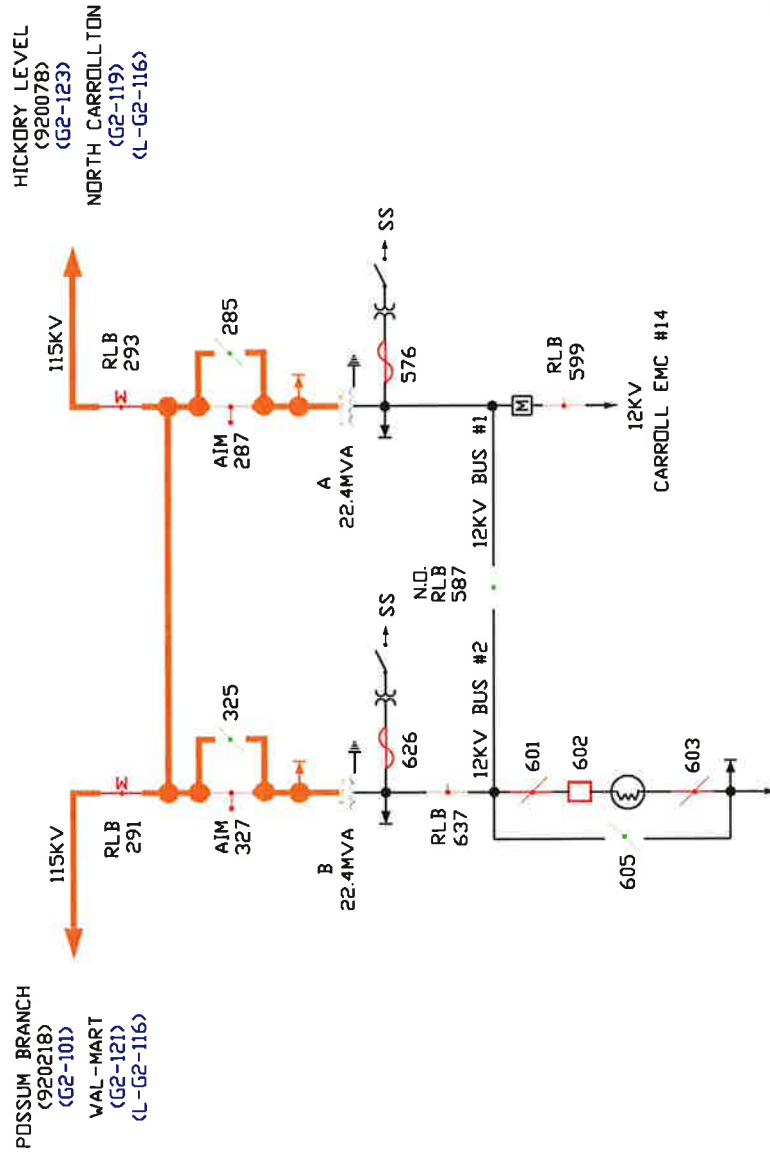
WAR COORDINATOR CONTACT INFORMATION

Dalton EMAIL: warcoord@dutil.com

GPC EMAIL: warcoord@southernco.com

GTC EMAIL: warcoord@gatrans.com

MEAG EMAIL: warcoord@meagpower.org



115KV SW. NO. PREFIX 138
12KV SW. NO. PREFIX GT

GEORGIA INTEGRATED TRANSMISSION SYSTEM
SUBSTATION DIAGRAM

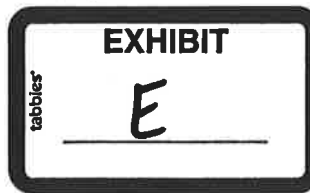
BUCK CREEK (GTC)

Drawn: 01-05-98 Revised: 05-21-14 CDH



Carroll EMC

Carroll Electric Membership Corporation • 155 North Hwy. 113 • Carrollton, GA 30117-7501



Phone: 770-832-3552
Web: www.cemc.com
Fax: 770-832-0240

May 9, 2014

VIA ELECTRONIC MAIL (jeff.herrin@southwire.com)

And

HAND DELIVERY

Mr. Jeff Herrin
Southwire Company
One Southwire Drive
Carrollton, Georgia 30119

RE: Service to 5152 Columbia Drive, Carrollton, Georgia ("Southwire North Campus")

Dear Jeff,

I am writing to remind you that as your contractual exclusive supplier of electric power to Southwire's North Campus, Carroll EMC is ready and capable to move the connection point for that facility whenever you want.

It is our understanding from previous discussions that Southwire would like the connection point for its North Campus facility relocated and hot on or around June 1, 2014. This presents no problem for Carroll EMC, and we would be pleased to make all necessary relocations of distribution lines. However, we have not yet heard from you to request any relocation or to coordinate the necessary connections, and therefore, we are not in a position to start any necessary work. Nonetheless, with just some slight advance contact, the actual changes to the distribution lines should only take a few days, so there remains plenty of time if June 1 is still your target date.

I should stress that the dispute presently pending before the Georgia Public Service Commission with respect to whether or not Carroll EMC has the exclusive right to continue serving the North Campus facility in the long term does not in any way affect our willingness to continue to adequately serve your needs in the immediate future. Should the legal process ultimately not support what we fully believe is our exclusive right to continue serving the North Campus, we of course would cooperate at such time to efficiently transfer service to another provider of your choice.

Mr. Jeff Herrin
May 9, 2014
Page 2

In addition to our desire to ensure you have adequate service in the immediate future; this letter is prompted by my concern over statements made by Georgia Power employees indicating their intent to provide "temporary power" to the North Campus facility. In fact, Georgia Power personnel recently contacted Carroll EMC to ask permission to overbuild Carroll EMC's distribution lines to the facility with their own lines for just that purpose. When Carroll EMC declined to give that permission, they began laying such lines along other paths. In light of these statements and actions by Georgia Power personnel, it may become necessary for Carroll EMC to seek an injunction against their provision of such power, since providing even "temporary" power would be in violation both of Carroll EMC's rights under the Georgia Territorial Act and of the present contractual agreement between Carroll EMC and Southwire.

But more importantly, for this letter and for the relationship between Carroll EMC and Southwire, the statements and actions of Georgia Power personnel make it necessary that I remind you of Southwire's contractual obligation as a customer/member of Carroll EMC to continue to receive all the electric power for the North Campus from Carroll EMC, pending any decision by the Georgia Public Service Commission to the contrary. To do otherwise is a breach of our existing contract, regardless of whether any other power received from another distribution provider was characterized as "temporary."

In closing, I urge you to have someone contact us if you wish to energize the relocated point of service in the next several weeks -- or at such time you do decide to move forward with energizing it. We look forward to continuing to serve all of Southwire's needs at the North Campus so long as that facility remains a Carroll EMC customer/member.

Please do not hesitate to contact me if you would like to discuss any aspect of this letter.

Sincerely,

CARROLL EMC



Jerome Johnston
Interim President/CEO

cc: Mr. Tom Stephens
Mr. Hugh Butler
Mr. Michael Hazelton
Mr. Don Conoly
Mr. Mark Cole

Southwire Company
One Southwire Drive
Carrollton, GA 30119
(770) 832-5032
www.tom.stephens@southwire.com



May 22, 2014

Jerome Johnston
Carroll Electric Membership Cooperative
155 North Highway 113
Carrollton, GA 30117

Jerome,

Southwire requests that Carroll EMC physically disconnect electrical power from the Southwire North Campus facility located at 5152 Columbia Drive in Carrollton, Georgia on May 31, 2014.

Respectfully Submitted,

Tom Stephens
Southwire Company
1 Southwire Drive
Carrollton, Georgia 30119


cc:
Richard Miller
Hugh Butler

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **CARROLL ELECTRIC MEMBERSHIP CORPORATION'S RESPONSE TO REQUEST OF PETITIONERS FOR EVIDENTIARY HEARING AND CARROLL ELECTRIC MEMBERSHIP CORPORATION'S REQUEST FOR PERMISSION TO PURSUE DISCOVERY** has been served upon the following via electronic delivery and addressed as follows, on this the 27th day of May, 2014.

Robert P. Edwards, Jr.
Troutman Sanders LLP
Bank of America Plaza
600 Peachtree Street, N.E.
Suite 5200
Atlanta, Georgia 30308-2216
bob.edwards@troutmansanders.com

John C. Stephens
Southwire Company, LLC
One Southwire Drive
Carrollton, Georgia 30119
John.Stephens@southwire.com



G. Mark Cole
Georgia Bar No. 176522