

LAW OFFICES  
**DANIEL, LAWSON, TUGGLE & JERLES, LLP**

912 MAIN STREET  
P.O. BOX 89  
PERRY, GEORGIA 31069-0089

ROBERT T. TUGGLE, III  
WILLIAM R. JERLES, JR.  
ROBERT R. LAWSON

TELEPHONE (478) 987-2622  
TELECOPIER (478) 987-7037  
www.dltj.com

TOM W. DANIEL  
(1939-2017)

December 30, 2022

HUGH LAWSON, JR.  
(1941-1998)

Ms. Sallie Tanner, Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, GA 30334  
salliet@psc.state.ga.us

RE: Notice of Filing  
Tri-County Electric Membership Corporation and Tri-County Service Center, Inc.  
Independent Accountant's Report with Officers Cost Certification Statement  
For Year Ended April 30, 2022  
Docket No. 42744

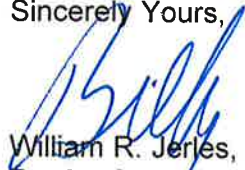
Dear Ms. Tanner,

Pursuant to the Alternative Electronic Filing Procedures of the Commission, Tri-County Electric Membership Corporation and Tri-County Service Center, Inc., hereby file its Independent Accountant's Report, with Officers Cost Certification Statement, certifying that Tri-County Electric Membership Corporation and Tri-County Service Center, Inc. have complied with its Cost Allocation Manual and Docket 42744.

A copy of the filing is also being provided by email to all parties listed on the enclosed Certificate of Service for Docket No. 42744. Pursuant to Ga. PSC Rule 512-2-1-.04(b). A hard copy of the enclosed filing will be provided to the Georgia Public Service Commission in compliance with the Alternative Electronic Filing Procedures.

Please contact me should you have any questions regarding this filing.

Sincerely Yours,

  
William R. Jerles, Jr.  
**Daniel, Lawson, Tuggle & Jerles, LLP**  
General Counsel, Tri-County  
Electric Membership Corporation

WRJjr/knr  
Enclosures

cc: Ray Grinberg



September 13, 2022

**INDEPENDENT ACCOUNTANT'S REPORT**

The Board of Directors  
Tri-County Electric Membership Corporation and Subsidiary

We have examined management of Tri-County Electric Membership (Tri-County EMC) and Tri-County Service Center, Inc. (Tri-Co Go)'s assertion, included in the accompanying Cost Certification Statement required by Tri-County EMC's Cost Allocation Manual (CAM), that Tri-County EMC and Tri-Co Go complied with cost certification requirements of the CAM for the year ended April 30, 2022. Management is responsible for their assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform procedures to obtain evidence about management's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

In our opinion, management's assertion that Tri-County EMC and Tri-Co Go complied with cost certification requirements of the CAM during the year ended April 30, 2022, is fairly stated, in all material respects.

This report is intended solely for the information and use of the Georgia Public Service Commission, Tri-Co EMC, and Tri-Co Go, and is not intended to be and should not be used by anyone other than these specified parties.

*McNair, McLemore, Middlebrooks & Co., LLC*  
McNAIR, MCLEMORE, MIDDLEBROOKS & CO., LLC

**Cost Certification Statement**  
**For the Year Ended April 30, 2022**

We hereby certify that to the best of our knowledge and belief Tri-County Electric Membership Corporation (Tri-County EMC) and Tri-County Service Center Corporation (Tri-Co Go) its broadband affiliate, have complied with the Cost Allocation Manual approved by the Public Service Commission (PSC). Furthermore, we certify that:

- All costs, including shared services, have been fully allocated between Tri-County EMC's electric activities and the broadband activities of Tri-Co Go.
- Any transfer of assets from Tri-County EMC to Tri-Co Go or vice versa has been at fair market value or cost, whichever is higher.
- Loans from Tri-County EMC to Tri-Co Go have been at market rates, except for loans made specifically for broadband services as described in Georgia law.
- Tri-County EMC and Tri-Co Go maintain separate books and records which are available for inspection as required by Georgia law.
- All costs have been allocated in accordance with the Cost Allocation Manual in order to assure compliance with Georgia law prohibiting cross-subsidization.
- Tri-County EMC has not conditioned the receipt of electricity services upon, nor provided more favorable terms for, customer of Tri-Co Go.

This certification is intended solely for the purpose of satisfying the requirements of the Tri-County EMC's Cost Allocation Manual and should not be relied on for any other purpose.

This 13<sup>th</sup> day of September 2022.

  
\_\_\_\_\_  
Ray Grinberg,

Chief Executive Officer – Tri-County Electric Membership Corporation and Subsidiary

  
\_\_\_\_\_  
Dawn Haskins,

Senior Executive VP and CFO – Tri-County Electric Membership Corporation and Subsidiary

**BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION**

**Docket No. 42744**

**CERTIFICATE OF SERVICE**

I certify that I have this day served a copy of the foregoing Independent Accountant's Report with Officers Cost Certification Statement for Tri-County EMC and Tri-County Service Center, Inc., upon the following persons by transmitting a copy of same via email to each party of record.

Patrick Reinhardt  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334  
[patrickr@psc.ga.gov](mailto:patrickr@psc.ga.gov)

L. Craig Dowdy  
Taylor English Duma LLP  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
[cdowdy@taylorenghish.com](mailto:cdowdy@taylorenghish.com)

Mr. Reece McAlister  
Georgia Public Service Commission  
Executive Secretary  
244 Washington Street SW  
Atlanta, GA 30334  
\*Via Federal Express

Mr. Brent Beal  
Century Link  
Government Affairs Director  
100 North Union Street  
Montgomery, AL 36104  
[Brent.beal@centurylink.com](mailto:Brent.beal@centurylink.com)

Mr. Newton M. Galloway  
Counsel for Public Service Telephone Co.  
Galloway & Lyndall, LLP  
406 North Hill Street  
Griffin, GA 30223  
[ngalloway@gallyn-law.com](mailto:ngalloway@gallyn-law.com)

Mr. Michael P. Foor  
Vice President-State Government Affairs,  
Georgia  
350 N. Main Street  
Cornelia, GA 30531  
[Michael.foor@windstream.com](mailto:Michael.foor@windstream.com)

Ms. Jeanne W. Stockman  
Century Link  
Associate General Counsel  
14111 Capital Boulevard  
Wake Forest, NC 27587  
[Jeanne.w.stockman@centurylink.com](mailto:Jeanne.w.stockman@centurylink.com)

Terri Lyndall  
Attorney for Public Service Telephone Co.  
406 North Hill Street  
Griffin, GA 30223  
[tlyndall@gallyn-law.com](mailto:tlyndall@gallyn-law.com)

Jason Bragg  
Rachael Young  
Georgia EMC  
75 5<sup>th</sup> Street, N.W., Suite 710  
Atlanta, GA 30308  
[jason.bragg@georgiaemc.com](mailto:jason.bragg@georgiaemc.com)  
[rachael.young@georgiaemc.com](mailto:rachael.young@georgiaemc.com)

Mr. Robert S. Highsmith, Jr.  
Counsel for Georgia Cable Association  
Holland & Knight LLP  
Regions Plaza, Suite 1800  
1180 W. Peachtree St, NW  
Atlanta, GA 30309  
[Robert.highsmith@hkllaw.com](mailto:Robert.highsmith@hkllaw.com)

Wayne Livingston  
Diverse Power Incorporated  
Kudzu Networks, Inc.  
1400 South Davis Road  
P.O. Box 160  
LaGrange, GA 30241-0003  
[Wayne.livingston@diversepower.com](mailto:Wayne.livingston@diversepower.com)

Mr. Adam Wise  
Georgia Telecommunications Association  
9040 Roswell Road, Suite 140  
Atlanta, GA 30350  
[awise@gta.org](mailto:awise@gta.org)

Dawn Kelliher  
Windstream  
VP-Head of State Government Affairs  
4001 N. Rodney Parham Road  
Little Rock, AR 72212  
[Dawn.kelliher@windstream.com](mailto:Dawn.kelliher@windstream.com)

Bryan Ferguson  
Habersham EMC/Trainwaive Fiber  
6135 State Highway 115 W.  
Clarksville, GA 30523  
[Bryan.ferguson@hemc.coop](mailto:Bryan.ferguson@hemc.coop)

Leon Bowles  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, GA 30334  
[Leonb@psc.state.ga.us](mailto:Leonb@psc.state.ga.us)

Mr. Steve Minor  
Counsel for Georgia EMC  
Tisinger Vance, P.C.  
100 Wagon Yard Plaza  
Carrollton, GA 30117  
[sminor@tisingervance.com](mailto:sminor@tisingervance.com)

Charles Autry  
Blue Ridge Mountain EMC  
Autry, Hall & Cook LLP  
2100 E. Exchange Place, Suite 210  
Tucker, GA 30084  
[autry@ahclaw.com](mailto:autry@ahclaw.com)

Andrew Kilgore  
Diverse Power Incorporated  
Kudzu Networks, Inc.  
1400 South Davis Road  
P.O. Box 160  
LaGrange, GA 30241-0003  
[Andrew.kilgore@diversepower.com](mailto:Andrew.kilgore@diversepower.com)

Dan Walsh  
Assistant AG-PSC  
State of Georgia  
40 Capitol Square, S.W.  
Atlanta, GA 30334-1300  
[dwalsh@law.ga.gov](mailto:dwalsh@law.ga.gov)

Patrick W. Turner  
Assistant Vice President  
AT&T Georgia  
244 Washington St., S.W.  
Atlanta, GA 30334-5701  
[Pt1285@att.com](mailto:Pt1285@att.com)

Glenn Purcell  
Habersham EMC/Trainwaive Fiber  
6135 State Highway 115 W.  
Clarksville, GA 30523  
[glenn.purcell@hemc.coop](mailto:glenn.purcell@hemc.coop)

Ray Grinberg  
Tri-County EMC  
310 W. Clinton Street  
Gray, GA 31032  
[rayg@tri-countyemc.com](mailto:rayg@tri-countyemc.com)

Lindsey Williamson  
Counsel for Georgia Cable Association  
Holland & Knight LLP  
Regions Plaza, Suite 1800  
1180 W. Peachtree Street, N.W.  
Atlanta, GA 30309  
[Lindsey.williamson@hkclaw.com](mailto:Lindsey.williamson@hkclaw.com)

Romanous Dotson  
Altamaha EMC  
611 West Liberty Street  
Lyons, Georgia 30436  
[romanous.dotson@altamahaemc.com](mailto:romanous.dotson@altamahaemc.com)

So certified, this 30<sup>th</sup> day of December, 2022.



William R. Jerles, Jr.  
Daniel, Lawson, Tuggle & Jerles, LLP  
912 Main Street  
Perry, GA 31069  
(478) 987-2622  
Attorney for Tri-County EMC and  
Tri-County Service Center, Inc.