PUBLIC RECORDS POLICY
FOR
JACKSON ENERGY AUTHORITY

Pursuant to Tenn. Code Ann. § 10-7-503(g), the following Public Records Policy for Jackson Energy Authority(JEA) is hereby adopted by JEA's Board of Directors to provide economical and efficient access to public records as provided under the Tennessee Public Records Act ("TPRA") in Tenn. Code Ann. § 10-7-501, et seq.

The TPRA provides that all state, county and municipal records shall, at all times during business hours, which for public hospitals shall be during the business hours of their administrative offices, be open for personal inspection by any citizen of this state, and those in charge of the records shall not refuse such right of inspection to any citizen, unless otherwise provided by state law. See Tenn. Code Ann. § 10-7-503(a)(2)(A). Accordingly, the public records of JEA are presumed to be open for inspection unless otherwise provided by law.

Personnel of JEA shall timely and efficiently provide access and assistance to persons requesting to view or receive copies of public records. No provisions of this Policy shall be used to hinder access to open public records. However, the integrity and organization of public records, as well as the efficient and safe operation of JEA, shall be protected as provided by current law. Concerns about this Policy should be addressed to the Public Records Request Coordinator for JEA or to the Tennessee Office of Open Records Counsel ("OORC").

This Policy is available for inspection and duplication in the office of JEA's Open Records Coordinator located at 250 N. Highland Ave. This Policy is posted online at www.jaxenergy.com. This Policy shall be reviewed annually.

I. Definitions:

A. *Records Custodian*: The office, official or employee lawfully responsible for the direct custody and care of a public record. See Tenn. Code Ann. § 10-7-503(a)(1)(C). The records custodian is not necessarily the original preparer or receiver of the record.

B. *Public Records*: All documents, papers, letters, maps, books, photographs, microfilms, electronic data processing files and output, films, sound recordings, or other material, regardless of physical form or characteristics, made or received pursuant to law or ordinance or in connection with the transaction of official business by any governmental agency. See Tenn. Code Ann. § 10-7-503(a)(1)(A).

C. *Public Records Request Coordinator*: The individual, or individuals, designated in Section III, A.3 of this Policy who has, or have, the responsibility to ensure public record requests are routed to the appropriate records custodian and are fulfilled in accordance with the TPRA. See Tenn. Code Ann. § 10-7-503(a)(1)(B). The Public Records Request Coordinator may also be a records custodian.

D. *Requestor*: A person seeking access to a public record, whether it is for inspection or duplication.

II. Requesting Access to Public Records

A. Public record requests shall be made to the Public Records Request Coordinator ("PRRC") or his/her designee in order to ensure public record requests are routed to the appropriate records custodian and fulfilled in a timely manner.

B. Requests for inspection only cannot be required to be made in writing. The PRRC should request a mailing [or email] address from the requestor for providing any written communication required under the TPRA.

C. Requests for inspection may be made orally or in writing using the attached Form. These requests should be made at 250 N. Highland Ave, by phone at (731)422-7500, or by email at openrecords@jaxenergy.com.

D. Proof of Tennessee citizenship by presentation of a valid Tennessee driver's license (or alternative acceptable form of ID) is required as a condition to inspect or receive copies of public records.

III. Responding to Public Records Requests

A. Public Record Request Coordinator

1. The PRRC shall review public record requests and make an initial determination of the following:

    a. If the requestor provided evidence of Tennessee citizenship;

    b. If the records requested are described with sufficient specificity to identify them; and

    c. If the Governmental Entity is the custodian of the records.

2. The PRRC shall acknowledge receipt of the request and take any of the following appropriate action(s):

    a. Advise the requestor of this Policy and the elections made regarding:

        i. Proof of Tennessee citizenship;

        ii. Form(s) required for copies;

        iii. Fees (and labor threshold and waivers, if applicable); and

        iv. Aggregation of multiple or frequent requests.

    b. If appropriate, deny the request in writing, providing the appropriate grounds such as one of the following:

        i. The requestor is not, or has not presented evidence of being a Tennessee citizen.

        ii. The request lacks specificity.

        iii. An exemption makes the record not subject to disclosure under the TPRA. (Provide the exemption in written denial)

        iv. The Governmental Entity is not the custodian of the requested records.

        v. The records do not exist.

    c. Forward the records request to the appropriate records custodian in JEA

3. The designated PRRC(s) is(are):

    a. Name or title: JEA Open Records Coordinator

    b. Contact information*:* Email- openrecords@jaxenergy.com; Phone–(731)422-7500 Address-250 N. Highland Ave, Jackson, TN 38301.

B. Records Custodian

1. Upon receiving a public records request, a records custodian shall promptly make requested public records available in accordance with Tenn. Code Ann. § 10-7-503. If the records custodian is uncertain that an applicable exemption applies, the custodian may consult with the PRRC, counsel, or the OORC.

2. If not practicable to promptly provide requested records because additional time is necessary to determine whether the requested records exist; to search for, retrieve, or otherwise gain access to records; to determine whether the records are open; to redact records; or for other similar reasons, then a records custodian shall, within seven (7) business days from the records custodian's receipt of the request, send the requestor a completed Public Records Request Response Form which is attached.

3. If a records custodian denies a public record request, he or she shall deny the request in writing as provided in Section III.A.2.b using the Public Records Request Response Form.

4. If a records custodian reasonably determines production of records should be segmented because the records request is for a large volume of records, or additional time is necessary to prepare the records for access, the records custodian shall use the Public Records Request Response Form to notify the requestor that production of the records will be in segments and that a records production schedule will be provided as expeditiously as practicable. If appropriate, the records custodian should contact the requestor to see if the request can be narrowed.

5. If a records custodian discovers records responsive to a records request were omitted, the records custodian should contact the requestor concerning the omission and produce the records as quickly as practicable.

C. Redaction

1. If a record contains confidential information or information that is not open for public inspection, the records custodian shall prepare a redacted copy prior to providing access. If questions arise concerning redaction, the records custodian should coordinate with counsel or other appropriate parties regarding review and redaction of records.

2. Whenever a redacted record is provided, a records custodian should provide the requestor with the basis for redaction. The basis given for redaction shall be general in nature and not disclose confidential information.

IV. Inspection of Records

A. There shall be no charge for inspection of open public records.

B. The location for inspection of records within the offices of JEA should be determined by either the PRRC or the records custodian.

C. Under reasonable circumstances, the PRRC or a records custodian may require an appointment for inspection or may require inspection of records at an alternate location.

V. Copies of Records

A. A records custodian shall promptly respond to a public record request for copies in the most economic and efficient manner practicable.

B. Copies will be available for pickup at a location specified by the records custodian.

C. Upon payment for postage, copies will be delivered to the requestor's home address.

D. A requestor will not be allowed to make copies of records with personal equipment.

VI. Fees and Charges and Procedures for Billing and Payment

A. Records custodians shall provide requestors with an itemized estimate of the charges prior to producing copies of records and may require pre-payment of such charges before producing requested records.

B. Fees and charges for copies are as follows:

1. $0.15 per page for letter- and legal-size black and white copies.

2. $0.50 per page for letter- and legal-size color copies.

3. Labor when time exceeds 60 minutes.

4. If an outside vendor is used, the actual costs assessed by the vendor.

C. Payment is to be made in cash, by personal check, or by credit card payable to Jackson Energy Authority presented to a cashier at either of our customer care centers located at 351 Dr. Martin Luther King Drive or 2030 Pleasant Plains Ext.

D. Payment in advance will be required when costs are estimated to exceed $20.

I. Aggregation of Frequent and Multiple Requests

1. JEA will aggregate record requests in accordance with the Frequent and Multiple Request Policy promulgated by the OORC when more than (4) requests are received within a calendar month (either from a single individual or a group of individuals deemed working in concert).

2. [If aggregating]:

a. The level at which records requests will be aggregated is 4 (*whether by agency, entity, department, office or otherwise*).

b. The PRRC is responsible for making the determination that a group of individuals are working in concert. The PRRC or the records custodian must inform the individuals that they have been deemed to be working in concert and that they have the right to appeal the decision to the OORC.