

# TENNESSEE REGULATORY AUTHORITY



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Nashville, Tennessee 37243-0505

T.R.A. DOCKET ROOM

February 17, 2006

Hon. Jean Stone, Hearing Officer  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

**RE: Review of Nashville Gas Company's IPA Relating to Asset Management Fees**  
**Docket number: 05-00165**

Dear Hearing Officer Stone:

The parties in this matter have agreed to extend the due dates in the procedural schedule for the filing of testimony by an additional four weeks; therefore, the TRA Audit Staff has filed the attached Motion to Amend Scheduling Order. The purpose of the extension is to allow the parties to continue to negotiate a potential settlement of the issues in this case. Prior to the filing of this motion and on behalf of the TRA Audit Staff, I have discussed this request with James Jeffries, counsel for Nashville Gas Company, and Joe Shirley, counsel for the Consumer Advocate, and they do not object. Please do not hesitate to call if you have any questions.

Very truly yours,

Aaron Rochelle  
Counsel for the Authority Staff

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>REVIEW OF NASHVILLE GAS</b>	)	<b>DOCKET NO.</b>
<b>COMPANY'S IPA RELATING TO ASSET</b>	)	<b>05-00165</b>
<b>MANAGEMENT FEES</b>	)	

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**MOTION TO AMEND SCHEDULING ORDER**

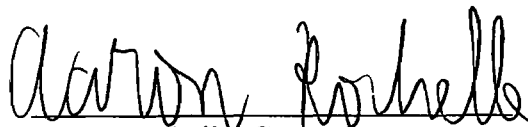
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TRA Audit Staff as a party ("Authority Staff") respectfully moves to amend the Order Establishing Procedural Schedule entered by the Hearing Officer on November 28, 2005. Authority Staff requests that the due date for filing of its Direct Testimony be extended from February 20, 2006 to March 20, 2006, and all other due dates in the scheduling order be likewise extended by four weeks. As grounds for this Motion, Authority Staff submits the following:

1. On November 28, 2005, the Hearing Officer issued its Order Establishing Procedural Schedule in this matter. Per the Order, Direct Testimony is due on February 20, 2006 (which is a state holiday).
2. Upon completion of the discovery phase of this matter, Authority Staff and the Consumer Advocate and Protection Division entered into comprehensive negotiations with Nashville Gas Company concerning a possible settlement of the issues in this case.
3. The Authority Staff aver that negotiations are proceeding in earnest, but due to the complexity of the issues, are extremely time-consuming. The parties feel that all interests will be best served by continuing settlement negotiations, thereby avoiding protracted litigation if possible.

4. Counsel for Nashville Gas Company and the Consumer Advocate and Protection Division have agreed to this request and do not object to this motion.
5. Wherefore, Authority Staff moves this Honorable Hearing Officer to grant this Motion, amend the scheduling order as stated above, and extend the remaining due dates by four weeks.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Aaron Rochelle", written over a horizontal line.

Aaron Rochelle, Counsel  
Tennessee Regulatory Authority  
460 James Robertson Pkwy.  
Nashville, Tennessee 37243-0505  
(615)741-3191 ext. 203

Dated: February 17, 2006

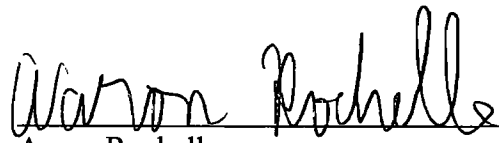
## CERTIFICATE OF SERVICE

I, Aaron Rochelle, hereby certify that I have served a copy of the foregoing document on the following persons by hand delivery or by depositing a copy of the same in the United States Mail, postage prepaid, addressed to them at the addresses shown below, this 17th day of February, 2006.

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Aaron Rochelle