## TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway Nashville, Tennessee 37243-0505

March 20, 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 have agreed to extend the due date for filing of Direct Testimony in the procedural schedule by one additional week. The purpose of the extension is to allow the parties to continue negotiations. James Jeffries, counsel for Nashville Gas, and Joe Shirley, counsel for the Consumer Advocate, concur in this request. Do not hesitate to call Gary or me if you have any questions.

Very truly yours,

**Authority Staff** 

Aaron Rochelle

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

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

## MOTION TO CONTINUE SCHEDULING ORDER

Authority Staff respectfully moves to continue the Procedural Schedule one week. Staff requests that the due date of March 20, 2006 be changed to March 27, 2006 to file its Direct Testimony. Staff also asks that the remaining due dates be likewise continued one week. As grounds for this Motion, Authority Staff submits the following:

- 1. On November 28, 2005, the TRA issued its Order Establishing Procedural Schedule in this matter. Per the Order, Direct Testimony was due on February 20, 2006.
- 2. On February 2, 2006, Authority Staff along with the Consumer Advocate and Protection Division, began negotiating a possible settlement with Nashville Gas Company.
- 3. On February 17, 2006, Staff filed its *Motion to Amend Scheduling Order*, which was granted by the Hearing Officer's *Order Amending Procedural Schedule* of February 17, 2006.
- 4. The parties aver that negotiations are proceeding satisfactorily. In the interests of judicial economy, the parties feel best served by continuing settlement negotiations.

5. Wherefore, Authority Staff moves the Hearing Officer to grant Staff an extension of time until March 27, 2006 to file its Direct Testimony and the rest of the Hearing Officer's Procedural Schedule be continued one additional week.

Respectfully submitted,

Aaron Rochelle, Counsel

Tennessee Regulatory Authority 460 James Robertson Pkwy.

Nashville, Tennessee 37243-0505

(615)741-3191

Dated: March 20, 2006

## CERTIFICATE OF SERVICE

I, Aaron Rochelle, hereby certify that I have served a copy of the foregoing request 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 20th day of March, 2006.

R. Dales Grimes, Esq. Bass, Berry & Sims, PLC AmSouth Center 315 Deaderick Street, Suite 2700 Nashville, Tennessee 37238-3001

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Stephen Butler & Joe Shirley, Esq. Consumer Advocate and Protection Division of the Office of the Attorney General Post Office Box 20207 Nashville, Tennessee 37202

Aaron Rochelle