

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**REVIEW OF NASHVILLE GAS  
COMPANY'S IPA RELATING TO  
ASSET MANAGEMENT FEES**

)  
)  
)  
)  
)

**DOCKET NO. 05-00165**

TRA DOCKET ROOM

2005 MAR 27 PM 1:58

RECEIVED

---

**AGREED MOTION TO STAY PROCEEDINGS**

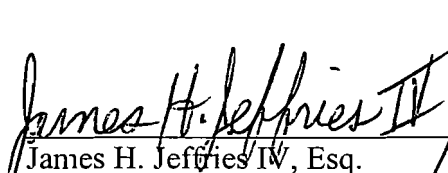
---

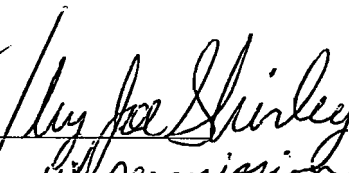
Nashville Gas Company, the TRA Audit Staff, and the Consumer Advocate Division (collectively, the "Parties") hereby move to stay these proceedings pending further negotiations by the Parties to settle all issues pending in this matter. As grounds for this motion, the Parties state as follows:

1. The Parties are conducting good-faith negotiations to settle the issues pending in this matter.
2. The Parties represent that these negotiations are progressing satisfactorily, but the Parties need additional time to fully pursue settlement of this matter.
3. To promote judicial economy, the Parties agree that these proceedings should be stayed to allow the settlement negotiations to proceed expeditiously.
4. If these proceedings are stayed, the Parties agree and request that the proceedings be resumed upon any Party's filing of a notice to resume the proceedings. If such notice is filed, the Parties further agree and request that the Direct Testimony be due in fifteen (15) days after the filing of the notice, and that the remainder of the schedule would follow from the date of filing such testimony in like intervals to the current schedule set forth in the Order Establishing Procedural Schedule.

WHEREFORE, THESE PREMISES CONSIDERED, the Parties request the Hearing Officer to enter an order staying the proceedings pending further settlement negotiations and directing that, upon any Party's filing of a notice to resume the proceedings, the initial testimony shall be due in fifteen (15) days after the filing of such notice and the remainder of the schedule shall follow from the date of filing of the initial testimony in like intervals to the current schedule set forth in the Order Establishing Procedural Schedule.


RESPECTFULLY SUBMITTED,

  
James H. Jeffries IV, Esq.  
Moore & Van Allen  
100 North Tryon Street, Suite 4700  
Charlotte, North Carolina 28202-4003


  
w/ permission

For Nashville Gas Company

  
Aaron Rochelle, Esq.  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

  
w/ permission

For TRA Audit Staff

  
Joe Shirley, AAG  
Office of the Attorney General  
P.O. Box 20207  
Nashville, Tennessee 37202

For Consumer Advocate Division

Dated: March 27, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served via the methods indicated on this 27th day of March, 2006, to the following:


Via first-class U.S. mail, postage prepaid:

James H. Jeffries IV, Esq.  
Moore & Van Allen  
100 North Tryon Street, Suite 4700  
Charlotte, North Carolina 28202-4003

R. Dale Grimes, Esq.  
Bass, Berry & Sims, PLC  
2700 First American Center  
Nashville, Tennessee 37238-2700

Via hand delivery:

Aaron Rochelle, Esq.  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

  
\_\_\_\_\_  
Joe Shirley  
Assistant Attorney General

#93739