BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

PETITION OF TENNESSEE AMERICAN WATER)	
COMPANY TO CHANGE AND INCREASE)	
CERTAIN RATES AND CHARGES SO AS TO)	DOCKET NO. 06-00290
PERMIT IT TO EARN A FAIR AND ADEQUATE)	
RATE OF RETURN ON ITS PROPERTY USED)	
AND USEFUL IN FURNISHING WATER)	
SERVICE TO ITS CUSTOMERS)	
)	

CONSUMER ADVOCATE AND PROTECTION DIVISION'S MOTION FOR EXTENSION OF TIME

The Office of the Tennessee Attorney General, by and through the Consumer Advocate and Protection Division, hereby moves for an extension of time in which to file its Pre-Filed Testimony. This Pre-Filed Testimony is currently due on Monday, February 26, 2007. By this Motion, the Consumer Advocate is requesting an extension of time to Wednesday, February 28, 2007.

The Consumer Advocate has been diligently working on its Pre-Filed Testimony but it has become apparent that more time is needed in order to properly cover all the material. The parties have all worked hard in this case but the fact is that certain discovery issues were not resolved until after the date discovery was due on February 6, 2007; this has delayed the Consumer Advocate's time in which to prepare testimony.

If this Motion is granted, the Consumer Advocate understands that the time to file Pre-Filed Testimony is similarly extended to all parities. The City of Chattanooga and the Manufacturer's Association support this request for an extension of time. In addition, the Consumer Advocate, speaking for itself only and acknowledging that it has not discussed this point with other parties yet, is willing to allow Tennessee American Water Company an additional two days in which to prepare its discovery requests, which are currently due on March 7, 2007. At this time the Consumer Advocate will make every attempt to respond to discovery requests in the time currently allowed so that the Procedural Schedule will not have to be further modified.

Respectfully submitted,

Vance L. Broemel, B.P.R. No. 11421

Assistant Attorney General

Office of the Attorney General

Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, TN 37202

(615) 741-8733

Stephen Butler B.P.R. No. 14772

Assistant Attorney General

Office of the Attorney General

Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, TN 37202

104540

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being forwarded via electronic mail and U.S. mail, to:

Richard Collier Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Henry Walker Boult, Cummings, Conners & Berry PLC 1600 Division Street, Suite 700 P.O. Box 340025 Nashville, Tennessee 37203 37243-0505

David C. Higney Grant, Konvalinka, & Harrison PC Republic Centre, Suite 900 1800 Republic Centre 633 Chestnut Street Chattanooga, TN 37450-0001 R. Dale Grimes
Bass, Berry & Sims PLC
AmSouth Center
315 Deadrick Street, Suite 2700
Nashville, Tennessee 37238-3001

Michael A. McMahan City of Chattanooga/Office of the City Attorney 801 Broad Street, Suite 400 Chattanooga, Tennessee 37402

Frederick L. Hitchcock Chambliss, Bahner & Stophel, P.C. 1000 Tallan Building Two Union Square Chattanooga, Tennessee 37402

ance I Browned

on this the 22nd day of February, 2007.

Vance L. Broemel