

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

IN RE:)	
)	
DOCKET TO EVALUATE CHATTANOOGA GAS COMPANY'S GAS PURCHASES AND RELATED SHARING INCENTIVES))))	DOCKET NO. 07-00224

**CONSUMER ADVOCATE'S MOTION FOR LEAVE TO SERVE MORE THAN
FORTY (40) DISCOVERY REQUESTS**

Robert E. Cooper, Jr., the Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division ("Consumer Advocate"), respectfully moves for leave to serve more than forty (40) discovery requests.

TRA Rule 1220-1-2-.11 provides as follows:


No party shall serve on any other party more than forty (40) discovery requests including sub-parts without first having obtained leave of the Authority or a Hearing Officer. Any motion seeking permission to serve more than forty (40) discovery requests shall set forth the additional requests. The motion shall be accompanied by a memorandum establishing good cause for the service of additional interrogatories or requests for production. If a party is served with more than forty (40) discovery requests without an order authorizing the same, such party need only respond to the first forty (40) requests.

As cause for serving more than forty (40) discovery requests, the Consumer Advocate relies on the reasoning set out in the Consumer Advocate's Motion For Leave To Serve More Than Forty (40) Discovery Requests, dated February 28, 2008, filed in TRA Docket 07-00224.¹ Additionally,

¹ One clear exception is the fact that the deficiency found by the hearing officer in the first motion is eliminated by submitting the discovery requests with this motion.


the Consumer Advocate relies on the reasoning expressed by the Consumer Advocate regarding this issue during the status conference held on March 7, 2008 in this same docket. The subject discovery requests are attached.

Respectfully submitted,


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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served via first-class U.S. Mail, postage prepaid, electronic mail, or hand delivery, upon the parties of record in this case on March 18, 2008.


Timothy C. Phillips
Senior Counsel

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