BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF CHATTANOOGA GAS)	
COMPANY FOR APPROVAL OF ITS)	
RATES AND CHARGES, MODIFICATION)	DOCKET NO. 09-00183
OF ITS RATE DESIGN, AND REVISED)	
TARIFF)	

CONSUMER ADVOCATE'S MOTION REQUESTING PERMISSION TO ISSUE MORE THAN FORTY DISCOVERY REQUESTS TO CHATTANOOGA GAS COMPANY

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division ("Consumer Advocate"), pursuant to TRA Rule 1220-1-2-.11(5)(a), hereby submits this motion requesting permission to issue more than forty discovery requests to Chattanooga Gas Company, Inc. ("CGC" or "Company"). Pursuant to TRA Rule 1220-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests and the discovery requests themselves.

RESPECTFULLY SUBMITTED,

ROBERT E. COOPER JR., BPR# 010934 Attorney General and Reporter

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Steven L. Lindsey, Vice President-Operations Chattanooga Gas Company 2207 Olan Mills Drive Chattanooga, TN 37421

Archie Hickerson Director Regulatory Affairs AGL Resources Inc. 150 W. Main Street, Suite 1510 Norfolk, VA 23510

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This the 6th day of January, 2010.

C. Scott Jackson