

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE:

**PETITION OF BERRY'S CHAPEL
UTILITY, INC. TO CHANGE AND
INCREASE RATES AND CHARGES**

DOCKET NO. 11-00198

**JOINT MOTION OF BERRY'S CHAPEL AND CONSUMER ADVOCATE TO EXTEND
PROCEDURAL SCHEDULE BY THIRTY DAYS AND DESIGNATE TRA STAFF
MEMBERS AS A PARTY**

Berry's Chapel Utility, Inc. (BCUI) and the Consumer Advocate and Protection Division of the Office of the Attorney General (CAPD) jointly ask the Hearing Officer to extend all pending dates in the procedural schedule in Docket No. 11-00198 by thirty days. As part of this motion, BCUI agrees to extend by thirty days the statutory deadline for the final resolution of this rate case. The parties need the additional time to work on discovery issues. With the concurrent extension of the six-month deadline, this extension will not prejudice any party or impact the deliberations of the Authority.

BCUI and the CAPD further request that members of the TRA Staff be designated as a party in this docket. Since some members of the Staff are already participating as a party in a related docket, No. 11-00065 (the show cause proceeding) and are already precluded from advising the Directors in both that docket and the rate case docket, there is no additional burden

on the Directors or on the remaining advisory staff in having those same staff members also participate as a party in the rate case. More importantly, both BCUI and the CAPD believe that the Staff's participation as a party in the rate case will contribute to the ongoing negotiations between BCUI and the CAPD and may ultimately make it more likely that the parties can arrive at a satisfactory settlement, not only in the rate case docket but in Docket No. 11-00065 as well. The participation of the TRA staff as a party will also contribute to a fuller presentation of the pertinent facts at any hearing that is held in this docket.

For these reasons, the parties jointly ask that all procedural dates be extended by thirty days, that the six-month deadline for a final decision in this case be extended by thirty days, and the TRA Staff members who are designated as a party in Docket No. 11-00065 also be designated as a party to Docket No. 11-00198.

Respectfully submitted,

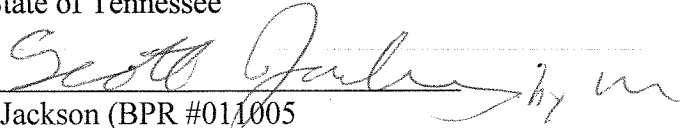
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