## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

June 21, 2012

IN RE:	
)	
COMPLAINT OF CONOCOPHILLIPS COMPANY )	
FOR AN ORDER DETERMINING	<b>Docket No. 11-00210</b>
CONOCOPHILLIPS NOT LIABLE FOR PENALTIES)	
AND CHARGES ASSESSED BY CHATTANOOGA )	
GAS COMPANY, OR, IN THE ALTERNATIVE,	
PETITION FOR SPECIAL RELIEF	

## AGREED MOTION FOR EXTENSION OF PROCEDURAL SCHEDULE

Chattanooga Gas Company ("CGC" or "Company") and ConcoPhillips ("ConocoPhillips") respectfully request a thirty (30) day extension of the deadlines in this Docket, including the immediate deadlines for the Parties to file a proposed settlement agreement and for CGC to file a responsive pleading. The Consumer Advocate and Protection Division of the Office of Attorney General & Reporter does not oppose this request. The Parties have made significant progress in the settlement discussions that are ongoing and need additional time to continue working toward filing a proposed settlement of all issues in this Docket.

On March 23, 2012, the Parties submitted a joint proposed procedural schedule for the Hearing Officer's consideration. By Order dated March 29, 2012, the Hearing Officer adopted the Parties' joint proposed procedural schedule. On June 4, 2012, based on the agreed motion filed by ConocoPhillips, the Hearing Officer granted a thirty (30) extension of all deadlines set forth in the Procedural Schedule entered on March 29, 2012, to accommodate the continuing settlement discussions of the Parties. Allowing the Parties another thirty (30) day extension will allow settlement discussions to conclude with either the filing of a proposed settlement

agreement for the Tennessee Regulatory Authority's consideration or proceeding with this contested case proceeding as set forth in the Procedural Schedule.

Respectfully submitted,

J. W. Luna, Esq. (BPR No. 5780)

Jennifer L. Brundige, Esq. (BPR No. 20673)

LUNA LAW GROUP, PLLC 333 Union Street, Suite 300

Nashville, TN 37201

(615) 254-9146

Attorneys for Chattanooga Gas Company

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing forwarded via email and U.S. Mail, postage pre-paid, on this the 21st day of June, 2012, to the following:

Kelly Cashman-Grams, Esq. Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Ryan McGehee, Esq. Vance Broemel, Esq. Office of the Attorney General and Reporter Consumer Advocate and Protection Division P.O. Box 20207 Nashville, TN 37202-0207

Tom Midyett, Esq. 318 Erin Drive, Suite 2A Knoxville, TN 37919

Jerry I Dundy