

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE: PETITION FOR A GENERAL RATE)	
INCREASE, IMPLEMENTATION OF A)	
DISTRIBUTION SYSTEM INFRASTRUCTURE)	DOCKET NO. 12-00049
CHARGE AND THE ESTABLISHMENT OF)	
TRACKING MECHANISMS FOR PURCHASED)	
POWER, PENSIONS AND CHEMICAL EXPENSES)	

MOTION FOR LEAVE TO ISSUE MORE THAN FORTY DISCOVERY REQUESTS

The Consumer Advocate and Protection Division of the Office of the Attorney General ("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 Tennessee American Water Company ("TAWC" 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



RYAN MCGEHEE (BPR #025559)
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Consumer Advocate and Protection Division
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Dated: July 6, 2012.

CERTIFICATE OF SERVICE

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

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This the 6th day of July, 2012.



RYAN L. MCGEHEE