

**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)	

**ARGEED MOTION TO EXTEND THE DEADLINE FOR THE FILING OF DIRECT
TESTIMONY TO AUGUST 27, 2012**


The Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), the City of Chattanooga ("City") and Walden's Ridge Utility District ("Walden's Ridge") (herein collectively "Requesting Intervenors") respectfully request the Hearing Officer in this matter, Chairman Kenneth Hill, to extend the direct testimony deadline set in this matter from August 20, 2012, to August 27, 2012. Tennessee American Water Company ("TAWC") and the Requesting Intervenors have agreed to the extension and a limit of a total of fifty (50) discovery requests collectively from all intervening parties, including Signal Mountain, that may be propounded on TAWC in the second round of discovery.

Attached is a modified proposed procedural schedule consistent with this Motion. The proposed changes to the schedule include moving the dates for the deadlines for objections to discovery, motions to compel and status conference to handle any discovery disputes if disputes arise.


At this time, counsel for Signal Mountain could not be reached to discuss an extension and limit on discovery requests by the intervening parties. In the interest of informing the Chairman of this request in a manner as timely as possible, the Requesting Intervening parties

and TAWC are submitting this request now. The Requesting Intervenors will continue efforts to contact counsel for Signal Mountain.

RESPECTFULLY SUBMITTED,


 w/permission ALM

Melvin J. Malone
For Tennessee American Water Company


 - w/permission ALM

Frederick L. Hitchcock
For the City of Chattanooga

Phillip A. Noblett
For Signal Mountain

 w/permission ALM

William H. Horton
For Walden's Ridge Utility District



RYAN MCGEHEE (BPR #025559)
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 532-5512

Dated: August 17, 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:

Melvin J. Malone
Butler, Snow, O'Mara, Stevens & Cannada,
PLLC
1200 One Nashville Place
150 Fourth Avenue, North
Nashville, TN 37219-2433

Lindsey W. Ingram III
Stoll Keenon Ogden PLLC
300 West Vine Street
Suite 2100
Lexington, KY 40507

Kevin Rogers
Operations Manager
Tennessee-American Water Company
1101 Broad Street
Chattanooga, TN 37402

William H. Horton
Horton, Ballard & Pemerton
735 Broad Street
Suite 306
Chattanooga, TN 37402

Frederick L. Hitchcock
Thomas C. Greenholtz
Willa B. Kalaidjian
Chambliss, Bahner & Stophel, PC
1000 Tallan Building
Two Union Square
Chattanooga, Tennessee 37402

Phillip A. Noblett
Signal Mountain Town Attorney
100 E., 11th Street
Suite 200
Chattanooga, TN 37402

Michael A. McMahan
Valerie L. Malueg
Phillip A. Noblett
100 E. 11th Street, Suite 200
Chattanooga, TN 37402

This the 17 day of August, 2012.



RYAN L. MCGEHEE

Docket 12-00049

July 6	First Round of Discovery Due
July 10	Objections to Discovery Due
July 13	Motions to Compel Due
July 30	First Round of Discovery Responses Due
August 27	Intervenors Prefiled Testimony Due
September 7	Second Round of Data Requests Due
September 14	Objections to Discovery Due
September 18	Motions to Compel Due
September 20	Status Conference (if necessary)
September 26	Second Round of Data Responses Due
September 26	Corrections to Intervenors Pre-filed Testimony
October 3	TAWC Rebuttal Due
October 8	Pre-Hearing Motions Due
October 15-19	Hearing
October 29	Post-Hearing Briefs Due