

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

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T.R.A. DOCKET ROOM

IN RE:

**PETITION OF NAVITAS TN NG, LLC
FOR AN ADJUSTMENT TO ITS NATURAL
GAS RATES AND APPROVAL OF REVISED
TARIFFS**

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DOCKET NO. 12-00068

**NAVITAS TN NG, LLC's SUPPLEMENTAL RESPONSES TO FIRST DISCOVERY
REQUEST OF THE CONSUMER ADVOCATE AND PROTECTION DIVISION**

COMES NOW, Navitas TN NG, LLC ("Navitas"), by and through undersigned counsel, and hereby submits the following Responses to the Consumer Advocate's First Set of Discovery Requests. Navitas states as follows:

1. The Consumer Advocate incorporates any Data Request filed by the TRA Staff in this Docket No. 12-00068 as if fully stated herein, and expressly reserves the right to seek supplemental responses and/or file a motion to compel if the Consumer Advocate determines that any responses to the Data Request are inadequate or incomplete.

RESPONSE BY THOMAS HARTLINE TO QUESTION 12:

Navitas and the Tennessee Regulatory Authority, in the presence of the Consumer Advocate reviewed the understanding of Question 12 in the afternoon of October 15, 2012.

Navitas noted that the Oklahoma Corporation Commission had recently approved the use of a 35% corporate tax rate and that Federal Taxes and Tennessee taxes are due regardless of the entity type.

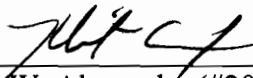
Navitas confirmed that it used the historic cost and depreciation method for Net Plant calculation in the Rate Base.

Navitas confirmed that it allocated its joint facilities based on percentage of customers in each jurisdiction.

The Company is continuing to work with the Consumer Advocate and the Tennessee Regulatory Authority to analyze the allocation issue.

Dated this the 26th day of October, 2012.

Respectfully Submitted,



Klint W. Alexander (#20420)

Wyatt, Tarrant & Combs, LLP

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Nashville, TN 37203

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VERIFICATION OF NAVITAS TN NG, LLC

STATE OF _____)
) **ss.**
COUNTY OF _____)

I Thomas Hartline, Secretary of Navitas TN NG, LLC, being duly sworn according to law, makes oath and affirm that I have read the foregoing documentation, know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.

THOMAS HARTLINE

Subscribed and sworn to me, a Notary Public in and for the above County and State, on this ____ day of October, 2012.

NOTARY PUBLIC

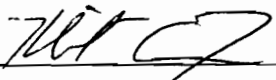
My Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2012, a copy of the foregoing was filed in the above-captioned action. A copy will be sent by regular U.S. Mail to:

Jean Stone, Esq.
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Ryan McGehee, Esq.
Consumer Advocate and Protection Division
State of Tennessee, Office of Attorney General
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Klint W. Alexander, BPR 020420