

STATE OF TENNESSEE

Office of the Attorney General



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Hon. Herbert H. Hilliard, Chairman
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

In Re: Application of B&W Pipeline, LLC for a Certificate of Convenience and Necessity to Operate a Natural Gas Pipeline System in Pickett, Morgan & Fentress Counties, TRA Docket No. 13-00151

Dear Chairman Hilliard:

The Consumer Advocate and Protection Division ("Consumer Advocate") has reviewed the Application of B&W Pipeline, LLC for a Certificate of Convenience and Necessity ("CCN") and related documents filed in this docket. In the Application, B&W Pipeline, LLC ("B&W" or "the Company") requests approval to operate a natural gas pipeline in portions of Pickett, Morgan, and Fentress Counties. At this time, B&W provides natural gas transportation services to Navitas TN NG, LLC ("Navitas"). In addition, there appear to be eight residential customers receiving natural gas from B&W, some of whom appear to have contractual agreements with the Company.

In its Application, B&W stated that it intended to transfer these residential customers to Navitas. Based on a review of B&W's responses to the TRA's data requests, the Consumer Advocate was concerned that there was insufficient information regarding B&W's plans to transfer services of the residential customers to Navitas. However, B&W filed an amended data response on October 22, 2014. In that response, B&W stated that it would honor its current contractual obligations with the residential customers and that no customer would be transferred to Navitas. Therefore, the Consumer Advocate's concern about the transfer of the residential customers is no longer at issue. The Consumer Advocate has also considered the financial, managerial, and technical qualifications of B&W by reviewing the Company's data responses filed in this docket. Based on this review, the Consumer Advocate does not intend to oppose the CCN on these grounds.

The Consumer Advocate does reserve its right to take appropriate action with respect to any proposed amendments or other changes that may be requested subsequent to the filing of this letter, or to protect the interests of consumers. This letter may not be used for any purpose other than relaying the Consumer Advocate's intent not to oppose the CCN, as described above.

The Consumer Advocate respectfully requests that this letter be filed in this docket.

Sincerely,

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