IN THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

IN RE:)				
PETITION OF BERRY'S CHAPEL)	DOCKET NO. 14-00004			
UTILITY, INC. TO INCREASE RATES)	DOCKET NOTE OVOI			
AND CHARGES; TARIFF TO RECOVER)				
THE COST OF FINANCIAL SECURITY;)		3 7	. :	• 3
IMPLEMENTATION OF PASS)		!		
THROUGHS FOR SLUDGE REMOVAL,)		8	1	
ELECTRICITY, CHEMICALS AND)		<u>دڙي</u>	1	. i .
PURCHASED WATER)		m	7	1
			<u></u>	 _	
			(2)		

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 Berry's Chapel Utility, Inc. ("BCUI" 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. Berry's Chapel does not oppose this Motion.

RESPECTFULLY SUBMITTED,

VANCE L. BROEMEL (BPR #11421)

Senior Counsel

Office of the Attorney General

Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

(615) 741-8733

Dated: 6 1, 2014.

CERTIFICATE OF SERVICE

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

Henry Walker Bradley Arant Boult Cummings, LLP 1600 Division Street, Suite 700

Nashville, TN 37203

This the 7th day of Lebrand, 2014.

ANCE L. BROEMEL