

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TN

March 4, 2015

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T.R.A. DOCKET ROOM

IN RE:

CARTWRIGHT CREEK, LLC,  
REQUEST TO UTILIZE ALTERNATIVE  
FINANCIAL SECURITY PURSUANT TO  
TENN. COMP. R. & REGS.  
1220-4-13-.07(5)

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DOCKET NO.  
14-00034

**JOINT MOTION FOR EXTENSION OF TIME**

Cartwright Creek, LLC and the staff of the Compliance Division of the Tennessee Regulatory Authority (collectively, "the Parties") jointly request an additional forty-five (45) days for Cartwright Creek to comply with the "Order Denying Request for Alternative Financial Security" issued January 6, 2014.

The Parties submitted a settlement agreement in this docket on April 1, 2014. The Authority issued a written Order on January 6, 2015 rejecting the settlement. The Order directs Cartwright Creek "to file within sixty (60) days proof of either a security bond or irrevocable letter of credit . . . in the amount of \$440,147 . . . or, in the alternative, another petition requesting approval of an alternative financial security," Order at 8. Since Cartwright Creek lacks the financial resource to obtain a bond or letter of credit in the amount of \$440,147, the utility will file a new petition for an alternative amount. The Order states that any such proposal, even if agreed to by the TRA Compliance Division, must include a substantial amount of additional information.

On behalf of Cartwright Creek, Mr. Bruce Meyer is responsible for locating, gathering and presenting all of this information. Mr. Meyer does not have the time necessary to assemble

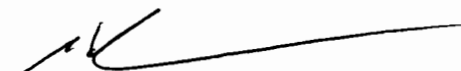
and present the documents requested by the TRA within the sixty (60) day time limit set by the Order. Therefore, the Parties request an additional forty-five (45) days for Cartwright Creek to comply with the deadline in the Order. The additional time will also enable the Parties to negotiate and draft an alternative proposal for financial security. Therefore, the Parties jointly ask that this motion be granted and that the time for Cartwright Creek to make the required filing be extended to April 21, 2015.

Respectfully submitted,



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