

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE:

**PETITION OF INTEGRATED RESOURCE
MANAGEMENT, INC. d/b/a IRM UTILITY,
INC. TO POST ALTERNATIVE FINANCIAL
SECURITY**

Docket No. 14-00072

**MOTION OF INTEGRATED RESOURCE MANAGEMENT, INC. FOR A
CONTINUANCE**

Integrated Resource Management, Inc. ("IRM") respectfully moves the Authority to defer the hearing on its petition scheduled for consideration on Monday, September 15, 2014 to its next regularly scheduled Conference Agenda. In support of its motion, IRM would show to Authority as follows:

1. The current financial security, a letter of credit in the amount of \$95,000.00, will expire on September 23, 2014. IRM is in the process of making application for replacement financial security in an amount of \$120,000.00 in the form of a bond or a letter of credit.
2. The replacement security will be in excess of the \$108,000.00 required pursuant to Authority rule and will render the Petition moot.
3. Under the circumstances, a later hearing, if necessary, on the issue of sufficiency of IRM's financial security would be duplicative as to one or more issues considered at a hearing at the September 15 Conference.
4. A delay of the hearing will not prejudice any rights or obligations of IRM or the Authority.

For the foregoing reasons, IRM requests that the hearing on the Petition filed in this cause be continued to the next available date.

Respectfully Submitted,

FARRIS BOBANGO, PLC

By: 

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