BEFORE THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

		T.R.A.
IN RE:)	DOCKET ROOM E
PETITION OF B&W PIPELINE, LLC)	DOCKET NO. 15-00042 ZI II
FOR AN INCREASE IN RATES)	

UNOPPOSED 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 (40) discovery requests to B&W Pipeline, LLC ("B&W" or "Company") as part of its second round of discovery requests. Pursuant to TRA Rule 1220-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by this motion. Henry Walker, Esq., Attorney for B&W, has informed undersigned counsel, Rachel A. Newton, that he is not opposed to the above-referenced request. The Consumer Advocate and B&W hereby submit the attached *Proposed Agreed Order Granting Leave to Issue More Than Forty Discovery Requests*.

Respectfully submitted,

Rachel A. Newton (#022960)

Assistant Attorney General

Office of the Attorney General

Consumer Advocate and Protection Division

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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 (BPR# 000272) Bradley Arant Boult Cummings, LLP 1600 Division Street, Suite 700 Nashville, TN 37203

Klint Alexander (BPR # 20420) Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. 211 Commerce Street, Suite 800 Nashville, Tennessee 37201

This the 2 day of July

Rachel A. Newton