

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION OF INTEGRA WATER  
TENNESSEE, LLC FOR A CCN AND  
AUTHORITY TO CHARGE RATES  
IN CASEY COVE SUBDIVISIONS  
LOCATED IN DEKALB COUNTY,  
TENNESSEE**

**DOCKET NO. 17-00014**


---

**CONSUMER ADVOCATE'S MOTION FOR LEAVE TO ISSUE  
MORE THAN FORTY DISCOVERY REQUESTS**

---

The Consumer Protection and Advocate Division of the Office of the Attorney General (Consumer Advocate), pursuant to TPUC Rule 1220-1-2-.11(5)(a), hereby submits this Motion requesting permission to issue more than forty discovery requests to Integra Water Tennessee, LLC. Pursuant to TPUC 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. A copy of the proposed discovery is filed herewith.

RESPECTFULLY SUBMITTED,

  
KAREN H. STACHOWSKI (BPR #019607)  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Public Protection Section  
Consumer Protection and Advocate Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Phone: (615) 741-1671  
Fax: (615) 532-2910  
Email: [karen.stachowski@ag.tn.gov](mailto:karen.stachowski@ag.tn.gov)

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:

Benjamin A. Gastel, Esq.  
Branstetter, Stranch & Jennings, PLLC  
The Freedom Center  
223 Rosa L. Parks Avenue, Suite 200  
Nashville, Tennessee 37203  
Tel: 615.254.8801  
Fax: 615.255.5419  
Email: beng@bsjfirm.com

This the 11<sup>th</sup> day of October, 2017.

Karen H Stachowski  
Karen H. Stachowski