

**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

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 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. 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) 741-2370
Fax: (615) 532-2910
Email: 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@bsjfinn.com

This the 9th day of May 2017.

Karen H. Stachowski
Karen H. Stachowski