

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

IN RE:

**PETITION OF TENNESSEE WATER
SERVICE, INC. FOR APPROVAL OF
AN INTERIM EMERGENCY
WILDFIRE RESTORATION
SURCHARGE, INTERIM EMERGENCY
WATER SERVICE AVAILABILITY
FEE, EMERGENCY MAKE-WHOLE
SURCHARGE AND AN INTERIM
EMERGENCY OPERATIONAL COST
PASS-THROUGH MECHANISM**

DOCKET NO. 17-00108

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 Tennessee Water Service, Inc. Pursuant to TPUC Rule 1220-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by its 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)

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Consumer Protection and Advocate 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:

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This the 5th day of October 2017.


Karen H. Stachowski