

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

IN RE:

**CHATTANOOGA GAS COMPANY
PETITION FOR APPROVAL OF AN
ADJUSTMENT IN RATES AND
TARIFF; THE TERMINATION OF THE
AUA MECHANISM AND THE
RELATED TARIFF CHANGES AND
REVENUE DEFICIENCY RECOVERY;
AND AN ANNUAL RATE REVIEW
MECHANISM**

DOCKET NO. 18-00017

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 Chattanooga Gas Company. Also, 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 as well as the discovery requests themselves.

RESPECTFULLY SUBMITTED



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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 20th day of March, 2018.



WAYNE M. IRVIN
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