

STATE OF TENNESSEE

Office of the Attorney General



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January 31, 2020

VIA ELECTRONIC FILING

Hon. Rob L. Morrison, Chair
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

**RE: Petition of Navitas TN NG, LLC For Approval of an Adjustment in the Rates,
Charges and Tariffs, TPUC Docket No. 19-00057**

Dear Chair Morrison:

Since the initial filing of Navitas TN NG, LLC's ("Navitas") *Petition* in the above-referenced Docket, Navitas and the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General ("Consumer Advocate") have engaged in extensive discussions concerning an appropriate resolution of this matter. Many of these discussions have become memorialized in the testimonies of Navitas's and the Consumer Advocate's pre-filed expert testimonies.

With the January 29, 2020 submission of pre-filed rebuttal testimony, Navitas witness Thomas Hartline altered two positions provided by the Consumer Advocate in its pre-filed direct testimonies. The remainder of the Consumer Advocate's positions were not contested.

Navitas and the Consumer Advocate now represent that it is the joint position of the Parties that this matter is ripe for consideration by the Tennessee Public Utility Commission. At this time, there remain no outstanding disputes between the Parties with respect to this Docket, as clarified by and through discovery, the Parties' pre-filed testimonies, and other submissions. It is the position of the Parties that this matter should be resolved consistent with these filings.

Consistent with Commission practice, the Parties request that the entire official record in this Docket, including discovery, be made part of the evidentiary record. The Parties also waive cross-examination of witnesses and closing arguments. Navitas witness Hartline and Consumer

Advocate witnesses Dittmore, Klein, and Bradley will provide summaries of their respective testimonies. The witnesses will also be available for questions from the Commissioners and Commission Staff.

As required, an original of this filing, along with four hard copies, will be submitted to the Commission. Should you have any questions concerning this filing, or if you require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. P. Whitaker, III". The signature is fluid and cursive, with a horizontal line at the end.

Daniel P. Whitaker, III
Assistant Attorney General

cc: Howard La Don Baltimore, Esq.