

STATE OF TENNESSEE

Office of the Attorney General



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September 3, 2019

Kelly Cashman-Grams
General Counsel
c/o Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Re: Records Request Related to TPUC Docket 19-00057, *Petition of Navitas TN NG, LLC for Approval of an Adjustment in the Rates, Charges and Tariffs*

Dear Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office (Consumer Advocate) respectfully requests the Tennessee Public Utility Commission (TPUC) to furnish some specific records which the Consumer Advocate believes the TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced Docket. The records requested are as follows:

- A. The service metrics reports compiled by Navitas and filed with the Commission for the last three calendar years;
- B. Electronic copies of the monthly excel files submitted by Navitas with each monthly surveillance report filed for the last 3 years;
- C. Either electronic or hard copies of consumer complaints filed with the Commission concerning Navitas within the last 3 years; and
- D. Electronic copies of the annual reports filed by Navitas for the last 3 years.

Thank you for your time and consideration of this matter. If you have questions regarding this request, please contact me at (615) 532-9299.

Respectfully,

A handwritten signature in blue ink, appearing to read "D. P. Whitaker, III", with a stylized flourish at the end.

Daniel P. Whitaker, III
Assistant Attorney General

cc: Howard La Don Baltimore, Esq.
Vanessa Novak, Esq.
TPUC Docket No. 19-00057