

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:

PETITION OF NAVITAS TN NG, LLC
FOR APPROVAL OF AN ADJUSTMENT
IN THE RATES, CHARGES, AND
TARIFFS

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Docket No. 19-00057

CONSUMER ADVOCATE'S MOTION TO SUBMIT MORE THAN FORTY
DISCOVERY REQUESTS

The Consumer Advocate Unit in the Financial Division of the Office of the Tennessee 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 Navitas TN NG, LLC ("Navitas"). The Consumer Advocate has discussed this matter with Counsel for Navitas, who is aware of the Motion and indicates Navitas does not object.

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 18th day of October, 2019.



DANIEL P. WHITAKER III
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