

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
ATNASHVILLE, TENNESSEE

IN RE:)
)
PETITION OF NAVITAS TN NG, LLC)
FOR APPROVAL OF AN ADJUSTMENT) Docket No. 19-00057
IN THE RATES, CHARGES, AND)
TARIFFS)

CONSUMER ADVOCATE'S SUPPLEMENT TO FIRST DISCOVERY
REQUEST TO NAVITAS TN NG, LLC

To: Howard La Don Baltimore, Esq.
Farris Bobango, PLC
414 Union Street, Suite 1105
Nashville, TN 37219
Email: dbaltimore@farris-law.com

This Supplement to the First Discovery Request is hereby served upon Navitas TN NG, LLC pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office ("Consumer Advocate") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. In submitting the First Discovery Request, the Consumer Advocate inadvertently did not include Request No. 1-60. The response is to be produced at the Office of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, War Memorial Building, 301 6th Avenue North, Nashville, Tennessee 37243, c/o Daniel P. Whitaker, III, on or before 2:00 p.m. (CDT), November 1, 2019.

PRELIMINARY MATTERS AND DEFINITIONS

This supplemental discovery request incorporates by reference the same Preliminary Matters and Definitions as set forth in the Consumer Advocate's First Discovery Request to

Navitas TN NG, LLC sent to the Company on October 18, 2019, and is to be considered continuing in nature, and is to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SUPPLEMENT TO FIRST DISCOVERY REQUESTS

1-60. Refer to the response to MFR Item 12 (WACC). Explain in detail the calculations of the following.

- (a) 2.00% value of personal guarantee
- (b) 14.99% cost of equity

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:

Howard La Don Baltimore, Esq.
Farris Bobango, PLC
414 Union Street, Suite 1105
Nashville, TN 37219
Email: dbaltimore@farris-law.com
Phone: 615-726-1200

This the 18th day of October, 2019.



DANIEL P. WHITAKER
Assistant Attorney General