

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE

IN RE:)
)
 INVESTIGATION INTO NAVITAS UTILITY) DOCKET NO. 19-00084
 COMPANY'S NOTICE OF PROBABLE)
 SHUT DOWN AND DISCONTINUATION OF)
 TENNESSEE SERVICES)

PRE-HEARING BRIEF OF B&W PIPELINE, LLC

While B&W Pipeline believes that, as proposed in the company's filing in this docket on September 16, 2019, a just and reasonable intrastate rate would be the interstate rate established by the Federal Energy Regulatory Commission of \$2.7172 per Mcf, B&W Pipeline will agree in the interest of quickly resolving the current situation to accept an intrastate rate of \$2.06178 per Mcf as proposed by the Consumer Advocate. At the request of the Consumer Advocate, the company will also agree that, in the absence of circumstances that are beyond the control of B&W and that threaten the continuation of service, not to initiate a rate case in Tennessee prior to January, 2022.


If the Commission approves this rate on October 14, 2019, B&W Pipeline will make the new rate effective as of October 1, 2019 and waive any objections which could potentially be raised either on the issue of retroactive ratemaking or the handling of this matter on an expedited basis.

B&W's acceptance of the Consumer Advocate's proposed rate and the company's failure to object to the truncated procedures of this docket are being done solely for the reasons described above and do not reflect B&W's position as to what a "just and reasonable" rate would be or the process by which that rate should be determined.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: _____


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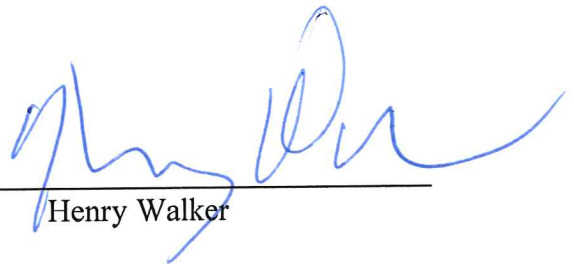
CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September, 2019, a copy of the foregoing document was served on the parties of record, via electronic delivery and U.S. Mail, postage prepaid, addressed as follows:

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