

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

Investigation into Navitas Utility Corporation's Notice of Probable Shut Down and Discontinuance of Tennessee Service

DOCKET NO. 19-00084

**RESPONSE IN SUPPORT OF CONSUMER ADVOCATE’S EMERGENCY MOTION
TO FIX REVISED MONTHLY CHARGE IN TARIFF**

Navitas TN NG, LLC (“Navitas”), files this response in support of the Emergency Motion to Revise Fixed Monthly Charge in Tariff of the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (“Consumer Advocate”). Navitas respectfully requests the Tennessee Public Utility Commission (“TPUC” or “Commission”) approve the Motion of the Consumer Advocate (“Motion”).

As set forth in the Motion, if the current TPUC tariffed rates as modified by B&W's FERC Order are not suspended or modified, consumers will be paying an excessive amount more than the rates set forth in TPUC's Final Order Setting Rates (Docket No. 15-00042). The additional charges threatened by B&W Pipeline, LLC ("B&W") pursuant to a Federal Energy Regulatory Commission ("FERC") would lead to such a scenario.

WHEREFORE, Navitas respectfully requests the Commission grant the Motion of Consumer Advocate, including, but not limited to:

1. Set a hearing on the merits of this Docket either on or before the next scheduled TPUC Commissioners Conference;

2. Adopt one of the tariff rate modifications set forth by the Consumer Advocate;
3. Consider if B&W's actions with respect to seeking a new FERC Order contravening TPUC Order in Docket 15-00042 was sanctionable; and
4. Grant such further relief as deemed appropriate.

This 17th day of September, 2019.

RESPECTFULLY SUBMITTED,



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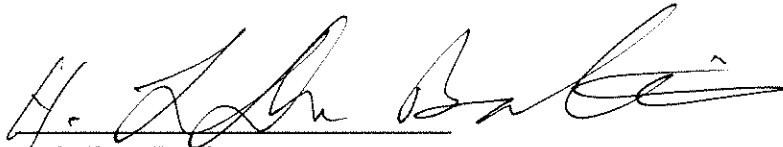
Counsel for Navitas TN NG, LLC

CERTIFICATE OF SERVICE

The undersigned, H. LaDon Baltimore, does hereby certify on this 17th day of September, 2019, a copy of the foregoing Order was transmitted via electronic mail or United States Mail, first class, postage prepaid to the following:

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