

**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 PETITION TO INTERVENE

Navitas TN NG, LLC ("Navitas"), files this response in support of the Petition of the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General ("Consumer Advocate"). The requested intervention meets the requirements of Tenn. Code Ann. § 65-4-118 and because consumers' interests, rights, duties or privileges may be determined or affected by this proceeding. The petition meets the requirements of T.C.A. §4-5-310(a)(2),(3) and (b) in that the intervention will not impair the interests of justice and will not impair the orderly and prompt proceedings.

WHEREFORE, Navitas TN NG, LLC respectfully requests the Tennessee Public Utility Commission grant the Consumer Advocate's Petition to Intervene.

This 17th day of September, 2019.

RESPECTFULLY SUBMITTED,



H. LaDon Baltimore (BPR #003836)
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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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