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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

IN RE:	
B& Pipeline, LLC	Docket No. 20-00004
v.	}
Navitas TN NG, LLC	

MOTION BY NAVITAS TN NG, LLC FOR EXTENSION OF TIME TO FILE AN ANSWER

Navitas TN NG, LLC ("Navitas TN" or "Navitas"), through its counsel of record, hereby submits this Motion For Extension of Time to File an Answer until April 24, 2020.. As grounds for this Motion, Navitas states to the Commission as follows:

- 1. Navitas is scheduled to file an Answer in this docket Friday, March 27, 2020.
- 2. A case is underway by the Kentucky PSC involving the parties to this docket which will impact this TPUC docket. A decision may be rendered in mid-April by the KYPSC which could lead to clarification in this docket and possibly, settlement.
- 3. Due to the current Coronavirus stay in place orders, compliance with the deadline is problematic.
- 4. With an extension, the interests of justice will be served in that the present docket may be settled, or at the least, clarify some issues. Economy of justice is served in that an extension will expedite further proceedings in this docket by clarifying some issues or resulting in a settlement.
- 5. Counsel for B&W Pipeline, LLC has authorized the undersigned counsel to state he has no opposition to this motion.

WHEREFORE, Navitas TN respectfully requests that:

- 1. The due date for the Answer by Navitas be extended until April 24, 2020; and
- 2. The Commission grant such other relief as appropriate.

RESPECTFULLY SUBMITTED,

H. LaDon Baltimore (BPR #003836)

FARRIS BOBANGO, PLC

Philips Plaza

414 Union Street, Suite 1105

Nashville, TN 37219

615-726-1200

dbaltimore@farris-law.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify on this 23rd day of March, 2020 a copy of the foregoing was transmitted via electronic mail or United States Mail, first class, postage prepaid to the following:

Henry Walker, Esq. Bradley Arant Boult Cummings, LLP 1600 Division Street, Suite 700

Nashville, Tennessee 37203

hwalker@bradley.com

H. LaDon Baltimore