

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE

**IN RE:**

**B& Pipeline, LLC**

v.

**Navitas TN NG, LLC**

Docket No. 20-00004

**MOTION BY NAVITAS TN NG, LLC FOR EXTENSION OF TIME TO FILE A  
RESPONSE TO B&W PIPELINE, LLC MOTION TO DISMISS NAVITAS  
COUNTERCLAIM**

Navitas TN NG, LLC ("Navitas TN" or "Navitas"), through its counsel of record, hereby submits this Motion for Extension of Time to File a Response to B&W Pipeline, LLC Motion to Dismiss Navitas Counterclaim until July 29, 2020 (30 days extension). As grounds for this Motion, Navitas states to the Commission as follows:

1. Navitas is scheduled to file a Response in this docket Monday, June 29, 2020.
2. A case decided June 17, 2020, by the Kentucky PSC, case # 2019-00430, involving the parties to this docket which will impact this TPUC docket. The rate surcharge set in that case directly impacts the issue in this TPUC docket. The parties are negotiating a possible settlement agreement in this docket.
3. With an extension, the interests of justice will be served in that the present docket may be settled, or at the least, some issues may be clarified. Economy of justice is served in that an extension will expedite further proceedings in this docket by some issues being clarified 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 Response by Navitas be extended until July 29, 2020; and
2. The Commission grant such other relief as appropriate.

**RESPECTFULLY SUBMITTED,**

A handwritten signature in black ink, appearing to read 'H. LaDon Baltimore', written over a horizontal line.

H. LaDon Baltimore (BPR #003836)

**FARRIS BOBANGO, PLC**

Philips Plaza

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Nashville, TN 37219

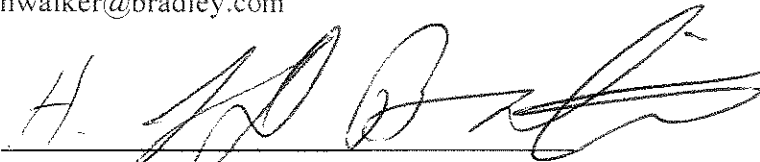
615-726-1200

dbaltimore@farris-law.com

### CERTIFICATE OF SERVICE

The undersigned does hereby certify on this 20th day of April, 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.  
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H. LaDon Baltimore