BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

)
)) 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 August 28, 2020. As grounds for this Motion, Navitas states to the Commission as follows:

- 1. Navitas is scheduled to file a Response in this docket Wednesday, July 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. At this time, some issues have been resolved, but a couple of issues are not settled.
- 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 August 28, 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 29th day of July, 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