#### Electronically Filed in TPUC Docket Room on August 27, 2020 at 6:01 p.m.

## 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 ADDITIONAL 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 Additional Time to File a Response to B&W Pipeline, LLC Motion to Dismiss Navitas Counterclaim until September 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 Friday, August 28, 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 settlement agreement in this docket. At this time, only one issue remains to be resolved and the agreement reduced to writing.
- 3. The President of Navitas is out of town and not able to review the final issue until the week of August 30. Because of this and the difficulty of all necessary parties communicating during this pandemic crisis, additional time is necessary to file the response.
- 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 render the case moot because of 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 September 28, 2020; and
- 2. The Commission grant such other relief as appropriate.

RESPECTFULLY SUBMITTED,

H. LaDon Baltimore (BPR #003836)

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### 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:

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