

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
DOCKET TO EVALUATE CHATTANOOGA)	Docket No. 20-00139
GAS COMPANY’S PURCHASES AND)	
RELATED SHARING INCENTIVES)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
JOINT PROPOSED PROCEDURAL SCHEDULE**

The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (“Consumer Advocate”), by and through Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully moves the Commission for an extension of time to file a joint proposed procedural schedule in the above-captioned Docket for the reasons that follow:

On August 25, 2021, the Commission ordered the parties to submit a joint proposed procedural schedule in the above-captioned Docket by September 8, 2021.¹ In this Order, the Commission also directed the Consumer Advocate Unit to file pre-filed testimony in support of its Petition filed in this matter and to present a witness at the hearing.² In order to evaluate how to best meet the directives contained within this Order, the Consumer Advocate respectfully requests an extension of two weeks to the September 8, 2021 deadline to file a joint proposed procedural schedule.

The undersigned counsel has contacted counsel for CGC regarding this request and can represent that CGC does not oppose the requested extension of time.

¹ *Order Denying Consumer Advocate’s Motion to Set Hearing and Requiring a Witness to be Presented*, p.5, TPUC Docket No. 20-00129 (August 25, 2021).

² *Id.*

Wherefore, the Consumer Advocate respectfully requests that its motion for extension of time be granted and that the deadline for filing a joint proposed procedural schedule be extended by two weeks.

RESPECTFULLY SUBMITTED,



RACHEL C. BOWEN (BPR No. 039091)

Assistant Attorney General

VANCE L. BROEMEL (BPR No. 011421)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Financial Division, Consumer Advocate Unit

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-8151

Fax: (615) 532-2910

Email: rachel.bowen@ag.tn.gov

Email: vance.broemel@ag.tn.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail, with a courtesy copy by electronic mail, upon:

Kelly Cashman Grams, Esq.
General Counsel
Tennessee Public Utility Commission
Legal Division
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Email: kelly.grams@tn.gov

J.W. Luna Esq.
Butler Snow LLP
150 3rd Ave. South, Suite 1600
Nashville, TN 37201
Telephone: (615) 651-6749
Email: jw.luna@butlersnow.com

Paul Teague
Director, External Affairs
Chattanooga Gas Company
2207 Olan Mills Drive
Chattanooga, TN 37421
Telephone: (404) 693-5986
Email: pteague@southernco.com

Floyd R. Self, Esq.
Berger Singerman, LLP
313 North Monroe Street, Suite 301
Tallahassee, FL 32301
Telephone: (850) 521-6727
Email: fself@bergersingerman.com

Elizabeth Wade, Esq.
Chief Regulatory Counsel
Southern Gas Company
Ten Peachtree Place, NW
Atlanta, GA 30309
Telephone: (404) 584-3160
Email: ewade@southernco.com

This the 1st day of September 2021.



RACHEL C. BOWEN
Assistant Attorney General