

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

IN RE:)	
)	
DOCKET TO COLLECT AND CONSIDER)	
INFORMATION RELEVANT TO)	
COMMISSION PRACTICE AND)	DOCKET NO. 21-00018
PROCEDURE FOR RULEMAKING ON)	
TENN. R. AND REGS. 1220-01-01, 1220-01-02,)	
AND OTHER SECTIONS AS DETERMINED)	
RELEVANT)	

**WITHDRAWAL OF MOTION TO FILE SUPPLEMENTAL COMMENTS AFTER THE
DEADLINE**

The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), hereby withdraws its previously filed *Motion to File Supplemental Comments After the Deadline* to the Tennessee Public Utility Commission’s (“TPUC” or the “Commission”) for consideration in this proceeding. The Consumer Advocate is withdrawing its motion in light of the Commission’s *Notice Soliciting Public Comments on Rulemaking* that was filed yesterday afternoon, March 24, 2025 by its General Counsel making the motion moot.

WHEREFORE, based on the foregoing, the Consumer Advocate respectfully requests permission to withdraw its previously filed *Motion to File Supplemental Comments After the Deadline*.

Respectfully submitted this 25th day of March, 2025.

RESPECTFULLY SUBMITTED,

Karen H. Stachowski

KAREN H. STACHOWSKI (BPR No. 019607)

Deputy Attorney General

VANCE L. BROEMEL (BPR No. 011421)

Senior Assistant Attorney General

Consumer Advocate Division

Office of the Tennessee Attorney General

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2370

Fax: (615) 741-1026

Email: karen.stachowski@ag.tn.gov

Email: vance.broemel@ag.tn.gov

TPUC Docket No. 21-00018

Withdrawal of Motion to File After the Deadline

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail, upon:

Kelly Grams, General Counsel
Tennessee Public Utility Commission
Legal Division
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Robert C. Lane
Director, Rates and Regulatory
Tennessee-American Water Company
109 Wiehl Street
Chattanooga, TN 37403
Email: Bob.Lane@amwater.com

Melvin J. Malone
Katherine Barnes
Butler Snow LLP
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
Email: Melvin.Malone@butlersnow.com
Email: Katherine.Barnes@butlersnow.com
Counsel for TAWC

J.W. Luna, Esq.
Butler Snow LLP
The Pinnacle at Symphony Place
150 3rd Ave S, Ste. 1600
Nashville, TN 37201
Email: jw.luna@butlersnow.com
Counsel for CGC

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

Jason Willard
Director, External Affairs
Chattanooga Gas Company
2207 Olan Mills Drive
Chattanooga, TN 37421
Email: jrwillar@southernco.com

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

William C. Bovender
Joseph B. Harvey
Hunter, Smith & Davis, LLP
P.O. Box 3740
Kingsport, TN 37664
Email: bovender@hsdlaw.com
Email: jharvey@hsdlaw.com
Counsel for KgPCo

William K. Castle
American Electric Power Service
Corporation
Three James Center
Suite 1100 1051 E. Cary Street
Richmond, VA 23219-4029
Email: wkcastle@aep.com

James R. Bacha
American Electric Power Service
Corporation
1 Riverside Plaza
Columbus, OH 43215
Email: jrbacha@aep.com

James G. Ritter
American Electric Power Service
Corporation
Three James Center
1051 E. Cary Street, Suite 1100
Richmond, VA 23219-4029
Email: jritter@aep.com

Paul S. Davison, Esq.
Holland & Knight LLP
511 Union Street, Suite 2700
Nashville, TN 37219
Email: paul.davidson@hklaw.com
Counsel for Piedmont Gas

Brian L. Franklin, Esq.
McGuire Woods LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202
Email: bfranklin@mcguirewoods.com
Counsel for Piedmont Gas

James H. Jeffries IV, Esq.
McGuire Woods LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202
Email: jjeffries@mcguirewoods.com
Counsel for Piedmont Gas

Pia Powers
Managing Director – Gas Rates & Reg.
Piedmont Natural Gas Company, Inc.
4720 Piedmont Row Drive
Charlotte, NC 28210
Telephone: 704-249-6685
Email: pia.powers@duke-energy.com

This the 25th day of March, 2025.



KAREN H. STACHOWSKI
Deputy Attorney General