

IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE TENNESSEE

IN RE:	)	
	)	
COMPLAINT AND PETITION AGAINST	)	
COUNCE NATURAL GAS COMPANY, INC.	)	
FOR ALLEGED VIOLATIONS OF THE	)	DOCKET NO. 24-00053
STATUTES AND RULES REGULATING	)	
CYBERSECURITY PLANS AND	)	
REPORTING	)	

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REQUEST TO WITHDRAW COMPLAINT AND  
PETITION TO CONVENE A SHOW CAUSE PROCEEDING

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Comes now the Tennessee Public Utility Commission ("TPUC" or "Commission") Staff as a party ("Party Staff" or "Petitioner"), by and through the undersigned counsel, and requests that the Administrative Judge permit Party Staff to withdraw its *Complaint and Petition to Convene a Show Cause Proceeding* ("Petition") and close the docket in this matter concerning Counce Natural Gas Company, Inc. ("Counce" or "Company"). As grounds for this request, Party Staff would state as follows:

Upon the filing of the *Petition*, Counce contacted Party Staff concerning the Company's lack of systems and computer data that would require the adoption and implementation of a cybersecurity plan. The parties discussed the statute not having an exception to the annual cybersecurity plan filing requirement. As a result, Counce has submitted a sworn statement certifying that it has no data or systems that require adoption of a cybersecurity plan. A copy of the statement is attached hereto as Exhibit 1. Party Staff asserts that such statement complies with the annual filing requirement and that the Company is in compliance with statutory and TPUC rule requirements concerning cyber security plan filings.

For the foregoing reasons, Party Staff respectfully requests that the Administrative Judge issue an Order granting the withdrawal of its *Petition* and closing this docket.

Respectfully submitted,



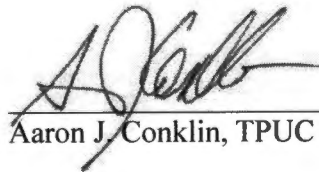
Aaron J. Conklin, #018597  
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Nashville, TN 37243  
(615) 770-6896  
Aaron.conklin@tn.gov

**CERTIFICATE OF SERVICE**

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

Counce Natural Gas Company, Inc.  
369 Highway 72  
P.O. Box 285  
Burnsville, MS 38833  
burnsvillegasco@gmail.com

This the 29th day of August, 2024.



Aaron J. Conklin, TPUC Senior Counsel

**EXHIBIT 1**  
**Filed Confidentially**  
**in accordance with**  
**TPUC Rule 1220-04-15.02**