

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

MAY 7, 2007

*In re: Petition of Tennessee Wastewater
Systems, Inc. to Amend its Certificate of
Convenience and Necessity*)
)
)

Docket No. 06-00259

**TENNESSEE WASTEWATER SYSTEMS, INC.'S FIRST ROUND OF DISCOVERY
TO
STARR CREST RESORTS II and USSERY #1**

The Tennessee Wastewater Systems, Inc. ("TWS") hereby serves the following discovery requests to Starr Crest Resorts II and Ussery #1 (the "Company").

DEFINITIONS

1. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

2. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of the Company, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings,

comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

3. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

4. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

5. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

6. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;

- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

GENERAL INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody

or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. For each data request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DISCOVERY REQUESTS

1. Identify each of the three entities listed in the Petition to Intervene and, as to each entity, provide the address of any property which is either owned or managed by the entity and which is subject to the rate increase described in the Petition (hereafter, the “subject properties”).

RESPONSE:

2. As to each of the subject properties:
- a. Describe the size of any building on the property, (including the maximum number of overnight guests the building can accommodate), the building's owner, and its usage, indicating in particular whether the building is used, in whole or in part, for overnight rental.
 - b. If the subject property is used, in whole or in part, for overnight rental (hereafter, the "rental properties"), provide (i) a current rate schedule, and (ii) a current advertisement for the property.
 - c. For each of the subject properties, provide copies of monthly electric and gas (natural or propane) bills for the following months: August, 2006, October, 2006, December 2006, and the most recent month available.
 - d. For each of the subject property, provide copies of all water bills for the most recent twelve months.
 - e. For each of the rental properties, provide a list covering the period of May 1, 2006, through April 30, 2007, showing (i) the number of days the property was rented, (ii) the approximate number of people who stayed overnight at the rental property on each night it was rented and, (iii) total rental income during that period.

RESPONSE:

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry M. Walker /dc

Henry M. Walker (No. 000272)

1600 Division Street, Suite 700

P.O. Box 340025

Nashville, Tennessee 37203


(615) 252-2363

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being forwarded via U.S. mail, to:

Robert G. Wheeler, Jr.
Attorney at Law
P.O. Box 110971
Nashville, TN 37222-0971

on this the 7 day of May 2007.



Henry Walker