

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

MAY 30, 2007

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

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electronically filed 5/30/07 @ 2:57pm

Docket No. 06-00259

**TENNESSEE WASTEWATER SYSTEMS, INC.'S RESPONSES TO SMOKEY COVE
LOG HOME RESORT'S, LYNN HENDRICK'S, and HP DEVELOPMENT'S
FIRST ROUND OF DISCOVERY**

The Tennessee Wastewater Systems, Inc. ("TWS") hereby submits the following responses to the First Set of Discovery Requests from Starr Crest Resort II ("Starr Crest") and Ussery #1 (the "Company") propounded upon TWS.

II. INTERROGATORIES

INTERROGATORY NO. 1: Please state the following information:

- a. Your full name;
- b. Your age;
- c. Your address;
- d. The name of your employer;
- e. The address of your employer;
- f. Your position of employment.

RESPONSE: See Interrogatory No. 2.

INTERROGATORY NO. 2: Please identify by name, address, and telephone number all persons who assisted you or your agents in the preparation of the answers to these Interrogatories and all sources of information, including any documents, consulted or referred to in the preparation of these answers.

RESPONSE: The following information was provided by Michael Hines, P.E., Founding Principal of Southeast Environmental Engineering, LLC (SEE). SEE is the contracting entity that manages TWS's east Tennessee operations. Mr. Hines is also President of Utility Capacity Corporation, Inc., the contracting entity that designed and constructed the sewerage systems for Smoky Cove Log Homes Resort.

INTERROGATORY NO. 3: Please list each person the Petitioner believes has Discoverable information relating to this matter. For each person, list their name, address, telephone number, and describe in detail the nature and extent of the discoverable knowledge possessed by such person, as known to the Petitioner.

RESPONSE: See pre-filed testimony of Charles Pickney and the responses to Interrogatories 2 and 5.

INTERROGATORY NO. 4: List the name, address, and telephone number of any

expert witnesses that you expect to call at trial and state the following:

- a. the subject matter on which said expert is expected to testify;
- b. the substance of the facts and opinions to which the expert is expected to testify;
- c. the grounds or basis for each opinion;

(RELATED DOCUMENT REQUEST): Pursuant to the attached Request for Production of Documents, please provide one copy of each report created by such expert.

RESPONSE: Petitioner does not intend to use the testimony of any expert witnesses.

INTERROGATORY NO. 5: Please provide the following information for any and all individuals, employees, independent contractors or agents of the Petitioner who have inspected or otherwise conducted tests or research or who have compiled numbers or data regarding wastewater usage for any property owned, controlled or maintained by Smoky Cove Log Home Resort, Lynn Hedrick, and/or HIP Development:

a. Full name;

RESPONSE: Michael Hines, P.E.

b. Age;

RESPONSE: 65

c. Address:

RESPONSE: 1920 Breezy Ridge Trail, Concord, TN 37922

d. Name of employer;

RESPONSE:

e. Address of employer;

RESPONSE:

f. Position of employment.

RESPONSE: Founding principal of Southeast Environmental Engineering LLC, the contractor managing TWS operations in east Tennessee.

g. Nature of work conducted on premises.

RESPONSE:

a. Full name;

RESPONSE: Tara Garrett

b. Age;

RESPONSE: 26

c. Address:

RESPONSE: 1920 Breezy Ridge Trail, Concord, TN 37922

d. Name of employer;

RESPONSE: Southeast Environmental Engineering, LLC

e. Address of employer;

RESPONSE:

f. Position of employment.

RESPONSE: Decentralized Wastewater Specialist

g. Nature of work conducted on premises.

RESPONSE: Field sampling, construction inspections, tank installations, pump installations.

(RELATED DOCUMENT REQUEST): Pursuant to the attached Request for Production of Documents, please provide one copy of each report or study conducted by the above individual, employee, independent contractor or agent of Petitioner.)

RESPONSE: See response to Interrogatory No. 6.

INTERROGATORY NO. 6: Please describe with specificity the methodology utilized by Petitioner to determine the wastewater usage attributable to each property owned, controlled or maintained by Smoky Cove Log Home Resort, Lynn Hedrick, and/or HP Development.

RESPONSE: TWS does not have flow data for each unit in the Smoky Cove Log Home Resort. Attached are periodic flow calculations for selected cabins. The data is derived from STEP pump logs at the indicated cabins.

INTERROGATORY NO. 7: What wastewater usage amount, provided in quantitative numbers, is being attributed by Petitioner for each property owned, controlled or maintained by Smoky Cove Log Home Resort, Lynn Hedrick, and/or HP Development.

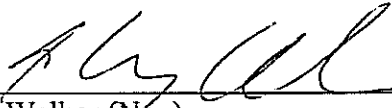
RESPONSE: The State Operating Permit issued to TWS for Smoky Cove is based on an application specifying 160 residential/resort homes designed at 250 gpd of sewage flow each.

(RELATED DOCUMENT REQUEST): Pursuant to the attached Request for Production of Documents, please provide any document which tends to establish the wastewater usage attributable to each property owned, controlled or maintained by Smoky Cove Log Home Resort, Lynn Hedrick and/or HP Development.

RESPONSE: See response to Interrogatory No. 6.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

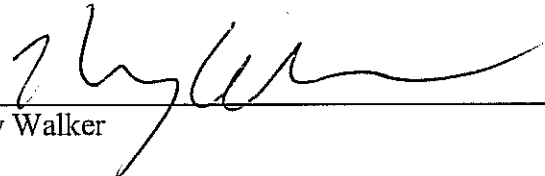
By: 
Henry Walker (No.)
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, Tennessee 37203
(615) 252-2363

CERTIFICATE OF SERVICE

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

Christopher W. Conner
Garner & Conner
250 High Street
P.O. Box 5059
Maryville, TN 37802
c_conner@gkfclaw.com

on this the 30 day of May, 2007.



Henry Walker

Sevier County Cabin Sewage Flow Data

Resort	Cabin Name	# Bdrms	Lot #	Address	24-May-07		29-May-07	
					Water Meter	Time Elapse (h)	Time Elapse (h)	Water Meter
					(gal)			(gal)
Starr Crest 2	Window to Heaven	5	140	1926 Starr View Drive	190876	321.06	322.19	191334
	Its Got It All	8	60	2211 Lone Eagle Drive	138300	98.16	102.3	143660
	Cloud 9	4	62	2219 Lone Eagle Drive	78714	79.23	80.03	79541
	Tree Top Haven	1	7	2232 Lone Eagle Drive	62741	77.86	80.42	63788
	Absolute Tranquility	2	67	2237 Lone Eagle Drive	66173	101.73	102.62	67014
	Mtn Lodge	8	38	1907 Legacy Drive	420229			426570
	High Adventure	7	40	1919 Legacy Drive	461935			464100
	Diamond in the Sky	8	37	2035 Milky Street	173673			175855
	Mtn Dream	2	15	2303 Rand Road	192373	312.43	315.8	193772
	Play House	1	7	2320 Rand Road	18549	28.65	29.86	19814
Black Bear	Black Bear Manor	12	11	1008 Crickett Wood Way	499904			503520
	Moonlight Lodge	8	13R	1009 Crickett Wood Way	320220			322378
	Valhalla Manor	12	12R	1010 Crickett Wood Way	543760			545445
	Wet-N-Wild	1	85	936 Black Bear Cub Way	157203			157595
	Bear Naked	1	37	854 Black Bear Cub Way	140147			140725
	Breathless	4	101	1723 High Rock	59110			60127
	Angel Crest	4	100	1721 High Rock	50083			51332
	TN Treasure	2	60	1215 Birds Nest Way	122965			123086
Smoky Cove	Smoky Bear	2	27	2807 Turkey Court		44.81	45.01	
The Highlands	Mt. LeConte Lodge	8	6	1156 Villa Overlook Way		201.93	203.92	
	Mama Bears Cabin	8	4	1152 Villa Overlook Way		287.79	289.23	
	Papa Bears Cabin	8	5	1154 Villa Overlook Way		475.49	475.49	
	Heavens View Lodge	8	3	1148 Villa Overlook Way		374	375.01	
	Blackbeary Lodge	8	2	1140 Villa Overlook Way		377.83	379.77	
	Blackbeary Cobbler	3	1	1132 Villa Overlook Way		264.42	265.29	

1 Data based on number of days unit rented during period.

Average Daily Flow	Calculated Gallons Pumped
(gal/day) ¹	(gal/day) ¹
239.50	118.65
1072.00	347.76
275.67	112
349.00	358.4
280.33	124.6
1268.20	
433.00	
436.40	
466.33	471.8
421.67	169.4
723.20	
431.60	
337.00	
130.67	
115.60	
203.40	
416.33	
40.33	
	16.8
	167.16
	201.6
	0
	84.84
	162.96
	182.7