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January 22, 2008

VIA HAND DELIVERY

Honorable Eddie Roberson, Chairman
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

filed electronically in docket office on 01/22/09

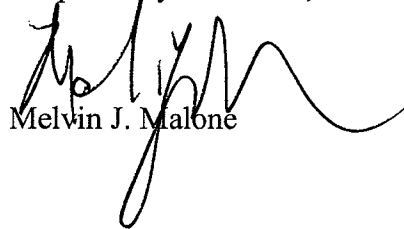
**RE: In Re: Petition for Approval to Transfer HC Sewage Treatment LLC's
Authority to Provide Wastewater Utility Services to Greeneville Oil and
Petroleum, Inc., TRA Docket No. 08-00222**

Dear Chairman Roberson:

Enclosed please find one (1) original and four (4) copies of the *Motion of Greeneville Oil and Petroleum, Inc. to Substitute Greeneville Sewage, LLC as the Petitioner* (the "Motion"). One (1) additional copy of the *Motion* is enclosed to be filed-stamped for our records.

If you have any questions or require additional information, please let us know.

Respectfully submitted,


Melvin J. Malone

clw

I.

BACKGROUND

On or about September 23, 2008, HC Sewage Treatment, LLC (“HC”) informed the Authority by letter that it was insolvent and no longer able to continue the operation of the sole plant owned by the utility in Hampton, Tennessee.¹ In the aforementioned letter, HC further informed the Authority that it would operate its plant until October 10, 2008.² With an aim towards serving the public interest, with the cooperation of HC, and with the knowledge of the Authority, Greeneville assumed the operations of HC’s wastewater facility on or about October 10, 2008. Greeneville has expended its own funds to operate the plant since on or about October 10, 2008, due to HC’s reported insolvency and inability to continue operations.

As a show of good faith to HC, on December 5, 2008, Greeneville submitted a *Petition to Transfer the Certificate of Public Convenience and Necessity of HC Sewage Treatment, LLC to Greeneville Oil and Petroleum, Inc.* (the “Petition”) to the Authority. At present, the parties have not yet reached agreement with respect to the transfer of HC Sewage Treatment, LLC.

II.

REQUEST

Greeneville Sewage, LLC is a limited liability company organized under and pursuant to Tennessee law. Greeneville Sewage, LLC is wholly-owned by Greeneville and Greeneville is the sole member of Greeneville Sewage, LLC. Attached hereto as **Exhibit A** is Greeneville Sewage, LLC’s Articles of Organization. Among other reasons, as Greeneville Sewage, LLC is

¹ See *In re: Request of HC Sewage Treatment, LLC for Authority Action Pursuant to Letter Dated September 23, 2008*, Order Requiring HC Sewage Treatment, LLC and First Bank and Trust Company to Appear and Show Cause Why the Tennessee Regulatory Authority Should Not Make a Claim Against HC Sewage Treatment, LLC’s Financial Security, TRA Docket No. 08-00183, p. 1 (Oct. 7, 2008) (“*Show Cause Order*”).

² *Show Cause Order* at 3.

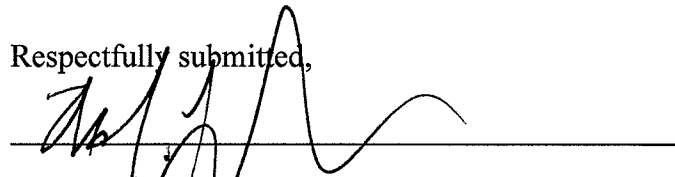
an affiliate of Greeneville, the public interest will not be harmed by the granting of this substitution.

III.

CONCLUSION

For the reasons set forth herein, Greeneville respectfully requests expedited consideration of this motion and the appointment of a Hearing Officer on the merits.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Melvin J. Malone', is written over a horizontal line.

Melvin J. Malone
Sarah Lodge Tally
MILLER & MARTIN PLLC
150 Fourth Avenue North
1200 One Nashville Place
Nashville, Tennessee 37219-2433
(615) 244-9270 telephone
(615) 256-8197 facsimile

Attorneys for:
Greeneville Oil and Petroleum, Inc.

EXHIBIT A

**GREENEVILLE SEWAGE, LLC's
ARTICLES OF ORGANIZATION**

Secretary of State
Division of Business Services
312 Eighth Avenue North
6th Floor, William R. Snodgrass Tower
Nashville, Tennessee 37243

DATE: 01/09/09
REQUEST NUMBER: 6417-2263
TELEPHONE CONTACT: (615) 741-2286
FILE DATE/TIME: 01/09/09 1554
EFFECTIVE DATE/TIME: 01/09/09 1554
CONTROL NUMBER: 0593852

TO:
MILLER & MARTIN PLLC
150 4TH AVE N

NASHVILLE, TN 37219-2433

RE:
GREENEVILLE SEWAGE, LLC
ARTICLES OF ORGANIZATION -
LIMITED LIABILITY COMPANY

CONGRATULATIONS UPON THE FORMATION OF THE LIMITED LIABILITY COMPANY IN THE STATE OF TENNESSEE WHICH IS EFFECTIVE AS INDICATED ABOVE.

A LIMITED LIABILITY COMPANY ANNUAL REPORT MUST BE FILED WITH THE SECRETARY OF STATE ON OR BEFORE THE FIRST DAY OF THE FOURTH MONTH FOLLOWING THE CLOSE OF THE LIMITED LIABILITY COMPANY'S FISCAL YEAR. ONCE THE FISCAL YEAR HAS BEEN ESTABLISHED, PLEASE PROVIDE THIS OFFICE WITH WRITTEN NOTIFICATION. THIS OFFICE WILL MAIL THE REPORT DURING THE LAST MONTH OF SAID FISCAL YEAR TO THE LIMITED LIABILITY COMPANY AT THE ADDRESS OF ITS PRINCIPAL OFFICE OR TO A MAILING ADDRESS PROVIDED TO THIS OFFICE IN WRITING. FAILURE TO FILE THIS REPORT OR TO MAINTAIN A REGISTERED AGENT AND OFFICE WILL SUBJECT THE LIMITED LIABILITY COMPANY TO ADMINISTRATIVE DISSOLUTION.

WHEN CORRESPONDING WITH THIS OFFICE OR SUBMITTING DOCUMENTS FOR FILING, PLEASE REFER TO THE LIMITED LIABILITY COMPANY CONTROL NUMBER GIVEN ABOVE. PLEASE BE ADVISED THAT THIS DOCUMENT MUST ALSO BE FILED IN THE OFFICE OF THE REGISTER OF DEEDS IN THE COUNTY WHEREIN A LIMITED LIABILITY COMPANY HAS ITS PRINCIPAL OFFICE IF SUCH PRINCIPAL OFFICE IS IN TENNESSEE.

FOR: ARTICLES OF ORGANIZATION -
LIMITED LIABILITY COMPANY

ON DATE: 01/09/09

FROM:
MILLER & MARTIN PLLC(1200 1 NASH PLACE)
1200 ONE NASHVILLE P
150 4TH AVENUE NORTH
NASHVILLE, TN 37219-2433

RECEIVED: FEES \$300.00 \$0.00
TOTAL PAYMENT RECEIVED: \$300.00

RECEIPT NUMBER: 00004512107
ACCOUNT NUMBER: 00001605



SS-4458

Received of Miller & Martin
CHECK ☒ CASH ☐
MAIL ☒ FILE ☐
5430

Riley C. Darnell

RILEY C. DARNELL
SECRETARY OF STATE

**ARTICLES OF ORGANIZATION
FOR
GREENEVILLE SEWAGE, LLC**

FILED

RECEIVED
STATE OF TENNESSEE

2009 JAN -9 PM 3: 54

RILEY DARNELL
SECRETARY OF STATE

In accordance with the provisions of Section 48-249-202 of the Tennessee Revised Limited Liability Company Act (the "Act"), the undersigned organizer files the following Articles of Organization for the purpose of organizing a limited liability company.

1. Name. The name of the limited liability company is Greenville Sewage, LLC.
2. Registered Office Address and Registered Agent. The street address of the registered office of the limited liability company is 100 South Main Street, Greenville, Greene County, Tennessee 37743, and its registered agent at such office is E. Grant Crum.
3. Principal Office Address. The address of the principal office of the limited liability company is 860 W. Andrew Johnson, P.O. Box 926, Greenville, Greene County, Tennessee 37744.
4. Effective Date. These Articles of Organization shall be effective upon filing with the Secretary of State.
5. Duration. The period of duration for the limited liability company shall be perpetual.
6. Management. The limited liability company will be member-managed.

IN WITNESS WHEREOF, I have executed these Articles of Organization this the 9th day of January, 2009.



Clinton C. Cromwell, Organizer

6417.2263

BK/PG:459A/1252-1253

09000343

2 PGS : AL - CHARTER	
CHARLOTTE BATCH: 71820	
01/14/2009 - 10:15:09 AM	
VALUE	0.00
MORTGAGE TAX	0.00
TRANSFER TAX	0.00
RECORDING FEE	5.00
DP FEE	2.00
REGISTER'S FEE	0.00
TOTAL AMOUNT	7.00

STATE OF TENNESSEE, GREENE COUNTY

JOY RADER
REGISTER OF DEEDS

JOY RADER

Register of Deeds
Greene County, TN

Payment Receipt
Batch# 71620

01/14/2009

RCVD OF: MILLER & MARTIN

When Revenue Is Paid By Check, Receipt
Is Not Valid Until Check Is Paid By Bank

Check(s) 7.00

Inst # 09000343 10:15:09 AM

CHARTER

Book: 459A Page: 1252

Recording Fee 5.00

DP Fee 2.00

Document Total: 7.00

Batch Total: 7.00

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy has been forwarded via U.S. Mail to the following on this the 22 day of January 2009.

T. Arthur Scott, Jr.
Attorney at Law
130 Nevermore Lane
Kingsport, TN 37664

Mr. Daniel Morrison
Ms. Cheryl Morrison
Pizza Plus
P.O. Box 629
Blountville, TN 37617

Timothy Phillips
Office of the Attorney General, Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207



Melvin J. Malone