

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**LYNWOOD UTILITY CORPORATION'S)
PETITION FOR ADJUSTMENT OF)
RATES)**

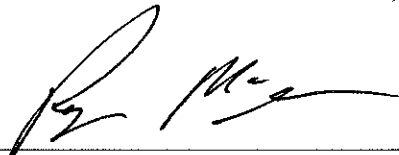
DOCKET NO. 09-00034

**CONSUMER ADVOCATE'S MEMORANDUM IN SUPPORT OF THE MOTION FOR
LEAVE TO SERVE MORE THAN FORTY (40) DISCOVERY REQUESTS**

Robert E. Cooper, Jr., the Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division ("Consumer Advocate"), respectfully moves for leave to serve more than forty (40) discovery requests pursuant to TRA Rule 1220-1-2-.11. The Consumer Advocate has forty one (41) discovery requests to submit. Counsel for Lynwood Utility Corporation has no objection to the Consumer Advocate's motion.

The Consumer Advocate respectfully submits odor control issues related to Docket 08-00060 may be in issue in this matter. Additional discovery requests pertaining to odor control expenses have been included in the Consumer Advocate's First Discovery Request.

RESPECTFULLY SUBMITTED,



RYAN L. MCGEHEE (BPR# 25559)
T. JAY WARNER (BPR #26649)
Associate Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 532-9299

Dated: May 4, 2009.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

Tyler Ring
President
Lynwood Utility Corporation
321 Billingsly Court, Suite 4
Franklin, TN 37065

Donald L. Scholes
Branstetter, Stranch & Jennings, PLLC
227 Second Avenue North, Fourth Floor
Nashville, TN 37201-1631

This the 4 day of May, 2009.



RYAN L. MCGEHEE