## IN THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

IN RE:	)		
PETITION OF TENNESSEE	)	DOCKET NO.	11-00187
WASTEWATER SYSTEMS, INC. TO	)		
POST ALTERNATIVE FINANCIAL	)		
SECURITY	)		

## PETITION OF TENNESSEE WASTEWATER SYSTEMS TO POST ALTERNATIVE FINANCIAL SECURITY

Tennessee Wastewater Systems ("TWS") petitions the Authority, pursuant to Rule 1220-4-13-.07(5), to approve and accept a bond of \$1,249,000 as sufficient financial security to comply with the Authority's rules.

According to the most recent UD20 Authority Form filed by TWS, the utility's reported annual revenue is \$1,415,000. The bond covers 88% of the utility's annual revenue. Because of the large number of independent systems operated by TWS, the size of the bond is adequate to cover any operational problems that might arise. Furthermore, TWS is much larger than any other utility providing stand-alone wastewater services in Tennessee. At the time this rule was adopted, TWS and other similar utilities were much smaller. It is not reasonable to require that a utility the size of TWS obtain a bond equal to 100% of its annual revenue. The proposed bond should be sufficient and should be approved, pursuant to Rule 1220-4-13-.07(5).

Respectfully submitted,

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