

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

IN RE:)	
PETITION OF LAUREL HILLS)	
CONDOMINIUMS PROPERTY OWNERS)	DOCKET NO. 12-00030
ASSOCIATION FOR A CERTIFICATE)	
OF PUBLIC CONVENIENCE AND)	
NECESSITY)	

**RESPONSE TO CUSTOMER INTERVENERS' MOTION FOR CONTINUANCE OF
HEARING DATE AND FOR REVISED SCHEDULING ORDER**

The Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate" or "AG"), does not oppose the Customer Interveners' Motion for Continuance of Hearing Date and for Revised Scheduling Order. As will be shown below, even though the parties have worked diligently in this case, much work remains to be done. Accordingly, a continuance from the current hearing date would make a thorough and well-prepared hearing more likely.

1. The Consumer Advocate has worked diligently, and in good faith, with Laurel Hills ("Laurel Hills" or "LH") on discovery issues. Specifically, on the following dates, the Consumer Advocate and Laurel Hills conferred on discovery issues:

- 8/28 AG/LH email exchange offering draft discovery and to meet and confer
- 8/30 AG draft discovery sent to LH
- 8/31 AG/LH telephone conference with counsel and Mr. McClung discussing the draft discovery

- 9/6 LH Pre-filed Testimony of Mr. McClung
- 9/7 LH Response to TRA and informal agreement that AG would have a week to review the responses to TRA data requests and McClung testimony before submitting formal AG discovery requests
- 9/14 AG formal discovery filed


2. The discovery responses received thus far from Laurel Hills will require a significant amount of work by the Consumer Advocate Regulatory Analysts, CPA, and other experts in order to fully determine a fair and reasonable rate.

3. The Consumer Advocate Regulatory Analysts, CPA, and other experts are also engaged in three other rate cases simultaneously with this docket. See Dockets 12-00049, 12-00064, and 12-00068. The Consumer Advocate Attorneys are also involved with each of these cases.

4. The Consumer Advocate anticipates that the testimony the Customer Interveners intend to obtain from Crab Orchard Utility District will be helpful in this case. Such testimony must be compelled by subpoena and that process may require an adjustment of the extant scheduling order.

5. The Consumer Advocate Attorneys primarily handling this docket (John J. Baroni and Charlena Aumiller) were previously scheduled to participate in the NARUC Utility Rate School from October 28, 2012 through November 4, 2012. A continuance of this docket would be beneficial to their participation in this program.

RESPECTFULLY SUBMITTED,



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Dated: 9/28/12.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to the Customer Interveners' Motion for Continuance of Hearing Date and for Revised Scheduling Order Petition to Intervene was served via U.S. Mail or electronic mail upon:

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This the 28th day of September, 2012.


JOHN J. BARONI