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OF COUNSEL:
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October 15, 2012

* ALSO ADMITTED IN GA
** ALSO ADMITTED IN KY
*** ONLY ADMITTED IN OH

Ms. Sharla Dillon
Docket Room Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Via Hand Delivery

Re: Petition of Laurel Hills Condominiums Property Owners Association for a
Certificate of Public Convenience and Necessity
Docket No. 12-00030

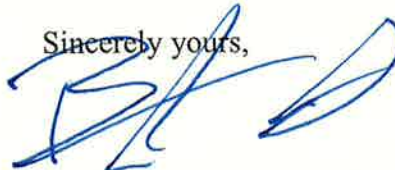
Dear Sharla:

I have enclosed an original and five copies of Laurel Hills Condominiums Property Owners Association's First Discovery Request to Customer Intervenors in the above styled case along with this cover letter.

This Request and this cover letter are being filed electronically by electronic mail this same date. Please return the additional copy of the Request stamp filed to me.

Thank you for your assistance.

Sincerely yours,



BENJAMIN A. GASTEL

Enclosure

c: Shiva Bozarth
John J. Baroni
Melanie Davis
Robert Schwerer
Michael McClung

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

IN RE:

PETITION OF LAUREL HILLS

CONDOMINIUMS PROPERTY OWNERS

ASSOCIATION FOR A CERTIFICATE

OF PUBLIC CONVENIENCE AND

NECESSITY

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DOCKET NO. 12-00030

**LAUREL HILLS CONDOMINIUMS PROPERTY OWNERS ASSOCIATION FIRST
DISCOVERY REQUEST TO THE CUSTOMER INTERVENORS**

Pursuant to Tenn. R. Civ. P. 26, 33, 34 and 36, and Tenn. Comp. R. R. § 1220-1-2-11, Laurel Hills Condominiums property Owners Association (“Laurel Hills”) serves this First Discovery Request to the Customer Intervenor. The Customer Intervenor is to produce responses at the office of Benjamin A. Gastel, Branstetter, Stranch, and Jennings, PLLC, 227 Second Ave. N., Fourth Floor, Nashville, TN 37201 or by email to beng@branstetterlaw.com no later than October 26, 2012.

For purposes of this Discovery Request the term “Customer Intervenor” includes Gary Haiser, John Moore, Gerald Nugent, Roy Perry, John Peters, Joel Matchak, Robert Adkins, Joe Garner, Terry Cope, Robert Schwarts, Onus Williams, Gene Maners, Michael Krabousanos, Wendell Blair, Luke Dunn, David Breg, Kent Latham, Cortez Investment Group, Inc., Jimmy Douglas, Thomas Bauer, Donal Sandlin, Judy Scales Patterson, Isaac Gamble, Renee Todd, Richard Knapp, John Chambers, John P. Peters Revocable Trust, and Cumberland Point Condominium Owners Association (“Cumberland Point”).

1. For each Customer Intervenor, other than Cumberland Point, identify the

Customer Intervenor's: full legal name, social security number, street address for service, billing address if different from service address, phone number for service and phone number for billing, whether the Customer Intervenor owns or rents the service address, and the number of weeks per year, on average, the Customer Intervenor occupies the service address.

RESPONSE:

2. For Cumberland Point identify: the name and billing address for every unit where Cumberland Point sends its request for membership dues, the name and unit number for any full time residents, and for all other units not occupied on a full time basis, the average number of weeks per year each unit is occupied.

RESPONSE:

3. For John Moore, identify all communications, either written or oral, between Mr. Moore and any manager or employee of the Crab Orchard Utility District related to the procurement of water for the Renegade Mountain development by stating: the date of the communication, or approximate date if the exact date is not known, the participants in the communication, the substance of the communication, and the purpose of the communication.

RESPONSE:

4. Identify the monthly rate of service fee the Customer Intervenors seek in this proceeding and identify the basis for why the Customer Intervenors believe that rate is a fair and reasonable rate of service.

RESPONSE:

5. Reference the Direct Testimony of John Moore, identify all facts and documents supporting, Mr. Moore's contention that the Renegade Mountain Community Club owned and operated the water system.

RESPONSE:

6. Reference the Direct Testimony of John Moore, describe in detail how Mr. Moore learned that the Renegade Mountain Community Club at some point owned and operated the water system.

RESPONSE:

7. Reference the Direct Testimony of John Moore, describe in detail Mr. Moore's contention that the developer of Renegade Mountain did not have the right to sell the water system to anyone other than the Renegade Mountain Community Club.

RESPONSE:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing was served upon the following via United States and Electronic Mail:

Shiva Bozarth, General Counsel Tennessee
Regulatory Authority 460 James Robertson
Parkway Nashville, TN 37243-0505

John J. Baroni, Esq
Consumer Advocate Division Office of
the Attorney General P.O. Box 20207
425 5th Avenue North, 2nd Floor Nashville,
TN 37243-0500

Melanie Davis
Kizer & Black Attorneys, PLLC
329 Cates St.
Maryville, TN 37801

This the 15th day of October, 2012



Benjamin A. Gastel