

filed electronically in docket office on
11/02/12
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)

**RESPONSES OF LAUREL HILLS CONDOMINIUMS PROPERTY OWNERS
ASSOCIATION TO SECOND AND THIRD DISCOVERY REQUEST OF THE
CUSTOMER INTERVENORS TO LAUREL HILLS CONDOMINIUMS PROPERTY
OWNERS ASSOCIATION**

The following are the Responses of Laurel Hills Condominiums Property Owner's Association ("Laurel Hills") to the Second and Third Discovery Request of the Customer Interveners, Gary Hauser, *et al.*, (the "Customer Interveners" or "Customers") served on October 5, 2012 and .

SECOND DISCOVERY REQUESTS

1. Gary Haiser, et al ("Customers") specifically incorporates each and every Data Request filed by the TRA on August 28, 2012 in this Docket as if fully stated herein. The Customers expressly reserve the right to seek supplemental responses and/or file a motion to compel if the Customers determine that any responses to the Data Request are inadequate or incomplete.

Response: Laurel Hills incorporates its responses to the Data Request filed by the TRA on August 28, 2012 in this Docket as if fully stated herein.

2. The Customers specifically incorporates each and every Discovery Request filed by the Consumer Advocate on September 14, 2012 in this Docket as if fully stated herein. The Customers expressly reserve the right to seek supplemental responses and/or file a motion to compel if the Customers determine that any responses to the Discovery Request are inadequate or incomplete.

Response: Laurel Hills incorporates its responses to the Discovery Requests filed by the Consumer Advocate on September 14, 2012 in this Docket as if fully stated herein.

3. The Customers specifically incorporates each and every Discovery Request filed by the TRA Staff on September 18, 2012 in this Docket as if fully stated herein. The Customers expressly reserve the right to seek supplemental responses and/or file a motion to compel if the Customers determine that any responses to the Discovery Request are inadequate or incomplete.

Response: Laurel Hills incorporates its responses to the Discovery Request filed by the TRA Staff on September 18, 2012 in this Docket as if fully stated herein.

4. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #1; explain the statement that every customer of Laurel Hills is a member of the RMCC, specifically with respect to "Pre-1972" property owners who may also be Laurel Hills customers.

Response: Laurel Hills believes that all maintains that all customers should and could be members of the Renegade Mountain Community Club so long as those customers remain in good

standing with the Renegade Mountain Community Club.

5. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #2; identify what three properties for which John Peters is currently responsible for water service and why he is currently being billed for only two properties.

RESPONSE: Laurel Hills does not have sufficient information to in its possession, custody, or control to respond to this Request. Specifically, customers have refused to provide information as to service address, and Laurel Hills often uses billing addresses to contact its customers.

6. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #2; define the term "abandonment". Define the 15 customers who have "abandoned" water service and the effective date the "abandonment" was noted. For each identify if and when (date) that a disconnection request was received. Explain why the 15 customers continue to be billed for water service.

Response: Laurel Hills states that the customers identified in Exhibit 1 have stopped paying for water service, and Laurel Hills believes that customers have abandoned water service based on this failure to pay.

7. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #2. Provide copies of all rebuffed requests sent to customers requesting updated addresses and/or other customer information and provide copies of all letters received from customers requesting that their account information be updated or changed.

Response: Laurel Hills has sent customers a request to sign a contract that had information requesting the identified information but no customer returned these forms. A representative copy of the requests is attached as Exhibit 2.

8. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #5; identify any approval by any authority (state, federal or other) approving Laurel Hills rate increase from \$25.00 to the \$86.40 for all customers prior to the rate increase being implemented in June 2011 and, if no approval was received, explain why this rate increase should be legally recognized.

Response: Laurel Hills states that it did not seek approval from any authority to increase the rate. The rate increase was necessitated by increasing costs associated with running and operating the system.

9. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #5; explain why Laurel Hills continued to invoice customers at the \$86.40 monthly rate from June 2011 to July 2012 for those customers who are Plaintiffs in Cumberland County Chancery Court Case 2012-CH-513 and thus are not required to pay that rate for monthly water service.

Response: Laurel Hills intends to preserve its right to collect the \$86.40 and therefore continues to bill at that rate.

10. Reference Laurel Hills response to the TRA Staff Data Request dated September 26, 2012, Response #6; noting that Robert Adkins is a full time resident in close proximity to the referenced

office, identify who occupied this location on what dates and hours from the time period September 15-30, 2012. Provide documentation such as pay stubs for time worked at this office.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

11. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #4; provide data originally requested with respect to prior period tax returns of Laurel Hills Condominiums Property Owners Association for years prior to 2011 (with permission, Landsford and Stephens Accountants access this information instantaneously, at no charge from the IRS website).

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

12. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #12, is Moy Toy, LLC's "developer" status currently being challenged in any ongoing legal proceedings?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

13. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #12; provide the date and any verifying documentation of when Renegade Florida, LTD and Renegade Florida Management, LLC acquired their interest in Moy Toy, LLC.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does

not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

14. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #12; provide the date and any verifying documentation of when Renegade Florida, LTD became the managing member of Moy Toy, LLC.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

15. Reference the Laurel Hills Response to the Consumer Advocate Division's Data

Request dated September 18, 2012, Response #12; provide a description of the discussions and negotiations surrounding the purchase of the water system (including, but not limited to determination of price, negotiation of the terms of sale, negotiation of the revocable lease and terms of the promissory note); for each provide the date or approximate date, a synopsis of the discussion or negotiation and the person (not entity) representing Laurel Hills and Moy Toy, LLC respectively.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

16. Reference the Laurel Hills Petition for a CCN, dated April 10, 2012, paragraph #3; if Laurel Hills did not operate the water system until its purchase on May 1, 2011 and Moy Toy, LLC decided not to operate the water system after their purchase on September 28, 2010, who was responsible for the water system and its continuous operation between September 28, 2010 and May 1, 2011? Provide documents.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does

not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

17. Reference the Laurel Hills Petition for a CCN, dated April 10, 2012, paragraph #3; who authorized and executed payments for water, electric and repairs of the system between September 28, 2010 and May 1, 2011?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

18. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #15; what individual(s), representing Moy Toy, LLC, approved the valuation method of the water system described in Response #15. What individual representing Laurel Hills approved the valuation method?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

19. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #15; state the names, addresses and contact information for the individuals at the Tennessee Association of Utility Districts (TAUD) with whom Laurel Hills consulted to determine the valuation method described in Response #15.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this

request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

20. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #15; what individual(s) from Laurel Hills or Moy Toy, LLC contacted TAUD and at the time were they representing Laurel Hills, Moy Toy, LLC or both entities?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

21. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #16; provide all records discussed in Response #16.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does

not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

22. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #18; given that the Renegade Mountain Community Club (RMCC) efficiently operated the water system prior to 2001, detail what discussions involving which individuals took place between Moy Toy, LLC and the RMCC and/or Laurel Hills and the RMCC in 2010/2011 regarding potential operation of the water system. If none, state why none were held.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this

request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

23. Reference Article V and Article VI of the 1972 Renegade Resort Covenants and Restrictions (and later versions), explain where said document gives the "developer" the authority or ability to sell (transfer legal control) of the water system to any other person or entity other than the RMCC? Under what authority did any party convey the water system at issue to any other party except the RMCC since the conveyance from the water system's original developer?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

24. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #20; as requested, describe the steps taken by Laurel Hills to ensure that the work performed by Renegade Resources, LLC is fair, prudent and reasonable for this geographic area and also as requested, state all members of Renegade Resources, LLC. Was the work bid out? If no, why not?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

25. Given the definitions and requirements of the Tennessee Non profit Corporation Act (TCA 48-58-302), explain how the decision to purchase the water system for \$400,000.00 between Laurel Hills and Moy Toy, LLC was not a violation of this statute with respect to a conflict of interest. Provide any documentation related to your response.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

26. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #22; provide a copy of the declarations page for each Laurel Hills' policy showing the starting date, effective date and annualized cost of each policy.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

27. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #24; identify when (date) the verbal contract between Laurel Hills and Darrell McQueen was made for his services, when (date) the invoice of Darrell McQueen was initially submitted to Laurel Hills for payment and when and who

approved this invoice.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

28. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #24; provide a listing of the specific professional consulting and supervision tasks performed by Darrell McQueen during the performance period including a detailed description of the work, hours and dates.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

29. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #25; to add specificity to the original question, explain why Laurel Hills is entitled to potential reimbursement from customers of any legal expenses not directly attributable to the organization of the water system, or TRA application process, more specifically those legal expenses spent on promoting and/or defending its efforts to admittedly operate an unauthorized and unregulated water system.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

30. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #26; if 15 customers were lost for "various reasons" explain

why they are all still being invoiced as of August 20, 2012 (see Laurel Hills General Ledger and Accounts Receivable Aging Report submitted as exhibits to Laurel Hills Response to the TRA Staff Data Request).

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

31. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #26; provide any and all proof in the form of documentation that Cumberland Point Condominiums, any other entity or any individual is in the process of planning to drill a well.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing

Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

32. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Response #26; confirm that one of the two existing wells (Baker) was required because no water lines are currently available to provide a connection.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

33. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Data Response #7 (Meeting Minutes); both the 2011 and 2012 referenced minutes list the address of Laurel Hills as 3277 Renegade Mountain Parkway and the Laurel

Hills TRA Petition lists Laurel Hills' address as 17 Mountain Laurel Drive. Which address is correct? Which address is staffed 5 hours per day? During what time frame was it being staffed 5 hours per day?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

34. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Data Response #7 (Meeting Minutes) lists that 143 weeks were present and recognized; given that a member in good standing must be current in maintenance fees to vote and that the general ledger data provided in Laurel Hills Response to the TRA Staff Data Request lists approximately five members maintenance fees were received, explain how 143 weeks were recognized and that a quorum was present to conduct business regarding the water system.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file

only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

35. Reference the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Data Response #7 (Meeting Minutes); the 2011 minutes indicate that Landsford and Stephens were approved to continue as the accounting firm for Laurel Hills indicating that copies of these records are backed up and available. Provide tax returns general ledgers and balance sheets for Laurel Hills for 2009 and 2010.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

36. Reference (1) the Laurel Hills Response to the Consumer Advocate Division's Data Request dated September 18, 2012, Data Response #7 (2012 Meeting Minutes), dated January 17, 2012 stating that Michael McClung will approach VEC (electric company) to discuss cutting off electricity for water operations and (2) the fact that the Customers in Cumberland County Chancery Court Case 2012-CH-513 aver that Michael McClung abandoned the water system at issue on January 19, 2012 by placing a work order for VEC to cut electric power to the Mullinix Pump Station; explain Michael McClung's actions during the period 17-20 January, 2012 with respect to attempting to stop electric power to the water system's pumps. Specifically did Michael McClung authorize a VEC work order on January 19, 2012 to stop electric service to the Mullinix Pump Station?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

37. Reference the Laurel Hills Response to the Consumer Advocate Division's Data

Request dated September 18, 2012, Data Response 20 (Renegade Resources, LLC); noting that this Data Response fails to list the duties performed by each employee and those specific hours attributable to water operations (example, why would any charges from January 1, 2011 to April 30, 2011 be valid), provide a detailed listing of dates, hours and tasks performed by Laurel Hills employees directly attributable to water operations.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

38. Given the approval of the new Laurel Hills BOD to purchase the water system in May 2011 and their decision to increase the maintenance fees on each timeshare week from approximately \$300 in 2010 to \$1300 in 2011 to \$1650 in 2012, confirm that the \$400,000 cost of the water system was or was not a factor in the BOD decision to raise the maintenance fees for Laurel Hills by 450% over a two year period.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does

not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

THIRD REQUESTS

1. Gary Haiser, et al ("Customers") specifically incorporates each and every Data Request filed by the TRA on August 28, 2012 in this Docket as if fully stated herein. The Customers expressly reserve the right to seek supplemental responses and/or file a motion to compel if the Customers determine that any responses to the Data Request are inadequate or incomplete.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

2. Gary Haiser, et al ("Customers") specifically incorporates each and every Discovery Request filed by the Consumer Advocate on September 14, 2012 in this Docket as if fully stated herein. The Customers expressly reserve the right to seek supplemental responses and/or file a motion to compel if the Customers determine that any responses to the Discovery Request are inadequate or incomplete.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

3. Gary Haiser, et al ("Customers") specifically incorporates each and every Discovery Request filed by the TRA Staff on September 18, 2012 in this Docket as if fully stated herein. The Customers expressly reserve the right to seek supplemental responses and/or file a motion to compel if the Customers determine that any responses to the Discovery Request are

inadequate or incomplete.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

4. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #4; as originally requested, provide all Laurel Hills POA bank statements from January 2010 to August 2012 (only June 2011 through August 2012 are attached).

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not

reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

5. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #9; as requested, please provide a detailed break out of all costs associated with the water tower rehabilitation; in addition please define the plan with phases, timelines and costs associated with each timeline or phase; indicate any ability to finance the repairs over time.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

6. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #9; explain why Laurel Hills submitted a detailed estimate from Pittsburgh Tank and Tower on July 18, 2012 to the TRA (TRA Response #1) when Laurel Hills already contracted and paid 10% of the total cost to begin repairs on June 9, 2011 to Preferred Tank and Tower (Laurel Hills Response to Customer Interveners First Request dated September 27,

2012).

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

7. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #9; explain the rational why Laurel Hills initiated a contract with Preferred Tank and Tower in June, 2011 (Laurel Hills Response to Customer Interveners First Request dated September 27, 2012), then submitted a plan to the Tennessee Department of Environment and Conservation (TDEC) to eliminate the water tower which was approved and now wants to again rehabilitate the water tower, or why was it important in June 2011, not important in December 2011 and is now important in 2012.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this

request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

8. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #5; identify any approval by any authority (state, federal or other) approving Laurel Hills rate increase from \$25.00 to the \$86.40 for all customers prior to the rate increase being implemented in June 2011 and, if no approval was received, explain why this rate increase should be legally recognized.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

9. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #9; explain why it would be economically preferable for Laurel Hills to use

Pittsburgh Tank and Tower to complete the water tank repairs if Laurel Hills has already contracted with and paid 10% of the total cost to Preferred Tank and Tower who offered a phased approach and will finance the repairs over time.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

10. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #10; since this response states that due to Chancellor Thurman's ruling in February, 2012, Laurel Hills could only "charge" customers \$43.20 for water, explain why customers continued to be billed for \$86.40 per month from March to July 2012 (Response #5, Laurel Hills Aging Accounts Receivable status as of August 24, 2012).

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40)

such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

11. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #10; since this response (and many previous responses) states that beginning in November 2011, many customers simply stopping paying their water bills altogether, define what "many" means and explain why the Laurel Hills 2011 General Ledger (Response #4 attachment) indicates approximately \$7623.60 of water revenue was received in November 2011 by laurel Hills.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

12. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #1 (Water Bills); explain the huge increase in the Crab Orchard Utility water bill for September 28, 2011, and if caused by the approximate 1,000,000 gallon leak that occurred on Roy Perry's property, explain the circumstances surrounding this loss, to include how long it took to identify the leak, how long it took to repair the leak, who repaired the leak and whether Laurel Hills is seeking the cost of this repair as part of the costs submitted to the TRA for consideration of its proposed water rates.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

13. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #1 (phone bill): explain why the telephone bill for Michael McClung (owner of account) should be considered as a cost of the water system and if for Laurel Hills official use, why is it not in Laurel Hills name.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does

not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

14. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #1 (phone bill): identify all other phone lines currently used and paid for by Laurel Hills and specify which are used in the "staffed" office, and for each voice line in the "staffed" office, provide a copy of the bill showing the call detail for each from January to August 2012.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

15. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #17: in this response (and many others) Laurel Hills states that it is unfair for the timeshare members to subsidize the water system. Given the information supplied by Laurel Hills of a zero percent occupancy rate of the timeshares (Response 22), an increase in the timeshare maintenance fees from \$300 to \$1650 in a two year period (Response 19), its inability to collect but \$14,300 of \$130,000 in total maintenance fees for 2011 (Response 4, 2011 General Ledger), the receipt of \$47,023 in 2011 water revenue (Response 4, 2011 General Ledger) and allocating approximately 50% of all "common" expenses to water customers (Michael McClung's Pre-filed Testimony), explain how and why the water system is not actual subsidizing the failing Laurel Hills timeshare operations.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

16. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #4: in reference to the bank statement electronic banking (EB) debit and credit transactions , identify who are the owners of accounts 0110550054, 0082593213, 0110550038, and any other accounts, and there relationship to Laurel Hills.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

17. Reference Laurel Hills response to the TRA Staff Data Request dated September 7, 2012, Response #4: provide detail and invoice for check #1057 to Wolfe-McClane.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

18. Reference Laurel Hills response to the TRA Staff Data Request dated September 7,

2012, Response #4: in reference to the 2011 General Ledger (Response 4) showing a credit entry of \$33.07 to close out a former checking account, identify this account and the owner and provide all bank statements and copies of checks from September 2010 through its closure.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

19. Further to the discovery request #22 filed by the Consumer Advocate on September 14, provide copies of the coverage description pages for policies 03088215, 03083096, and any other policies not listed in Laurel Hills Response to the Staff data Request, Response #1. Although Laurel Hills response promised this information by supplemental response, it has not been provided effective this date.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

20. In reference to Laurel Hills Response to the Customers First Data Request, Response #12: VEC Summary and reference the electronic copies of the 2011 and 2012 profit and loss detail, utilities account, explain why the electric amounts for the Mullinix Drive station match the VEC Summary for 2012 but exceed the VEC Summary for 2011. Laurel Hills' response indicated that the 2011 electric bills included amounts attributable to timeshare operations. Provide revised Water Income and Expense spreadsheet (attached electronically to Laurel Hills response to the TRA Staff Data Request) correcting this omission.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

21. In reference to Laurel Hills Response to the Customers First Data Request, Response #17: in this response Laurel Hills states that the former owners of the water system

did not have sufficient funds to pay the fine. Verify that the legal previous owner and operator of the water system was Moy Toy, LLC. Identify all actions taken, on behalf of the water customers, to recoup the fines paid by Laurel Hills from previous owners' neglect.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

22. Explain the \$11,000 received by Laurel Hills from Moy Toy, LLC in 2011, and since Laurel Hills did not yet own the water system, identify its purpose, the terms for repayment if any, and the individual (not entity) that approved (signed by Moy Toy) and accepted (Laurel Hills) disbursement.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

23. In reference to Laurel Hills Response to the Customers First Data Request, Response #18; in Laurel Hills response to the TRA Staff Data Request it stated that there are 8 timeshare units and in Response #18, they state that there are approximately 200 weeks deeded which accounts for only 50% of the total timeshare units (8 units times 50 weeks). Explain the status of the remaining 200 units, if they are spread across all 8 units or confined to one or more specific units and if they were ever deeded.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

24. In reference to Laurel Hills Response to the Customers First Data Request, Response #18; in this response, Laurel Hills states "Laurel Hills, realizing that collection of maintenance fees from owners will never reach 100%, sets the maintenance fee based on the estimation of how many timeshare owners will actually pay the maintenance fees". Identify

if the business model described for setting timeshare rates is, or will be used for water operations, if not explain the prudent steps Laurel Hills will take to collect the fees due by all water customers and not further encumber those responsible individuals who do pay their water bills with paying for the expenses of those customers who don't pay.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

25. In reference to Laurel Hills Response to the Customers First Data Request, Response #21; given that Laurel Hills borrowed money from Renegade Mountain Timeshares, LLC to finance water operations and does not own any timeshares as stated in the response, state the purpose and business functions that Renegade Mountain Timeshares, LLC was organized to perform and state specifically all business interactions between Renegade Mountain Timeshares, LLC and Laurel Hills.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40)

such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

26. In reference to Laurel Hills Response to the Customers First Data Request, Response #23; since the response states that minutes of the December 22, 2011 meeting were not kept, please provide a statement from Michael McClung, Phillip Guettler and Darren Guettler as to where the meeting was held, who attended the meeting, what subjects were covered and discussed, the actual resolutions derived and approved and the final vote for each.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

27. In reference to Laurel Hills Response to the Customers First Data Request,

Response #24/25; Laurel Hills' responses state that they are under no obligation to maintain a Customer Complaint Log which is in contradiction to Rule 1200-5-1.17(24) which states "All community water systems must establish and maintain a file of customer complaints". Given this deficiency was cited in the 2006, 2007 and 2011 TDEC Sanitary Surveys, identify whether Laurel Hills is or is not required to maintain a Customer Log/file, and if so has Laurel Hills maintained this log/file as required.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

28. In reference to Laurel Hills Response to the Customers First Data Request, Response #24/25; in Laurel Hills' responses provided they state that all email and hardcopy complaints obtained from a reasonable search were attached to the Response, however no documents were attached as stated. Indicate whether these attachments were intentionally or unintentionally omitted and if unintentionally omitted, resubmit. Additionally state whether any director, officer or employee of Laurel Hills has knowledge of any additional complaints from water customers where documents are not available to record such complaints.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

29. In reference to Laurel Hills Response to the Customers First Data Request, Response #28: in Laurel Hills' response provided they state that the requested bank statements were provided as part of their response to the TRA initial Staff Data Request, however the specific bank statements were not attached as stated. Indicate whether these attachments were intentionally or unintentionally omitted. If unintentionally omitted, resubmit, if intentionally omitted, explain the reason they were omitted.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery

requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

30. In reference to the 2011 General Ledger provided by Laurel Hills in their Response to the Staff Data Request (Response 4); Identify whether the amounts paid to VEC for electric from January to April 2011 were for timeshare operations only, or whether the amounts included the electric meter at the Mullinix pump station. If for timeshare operations only explain the significant increase in electric used for timeshare operations in relationship to those same months in 2012. If the total bill includes the Mullinix Pump Station electric, indicate why laurel Hills paid these amounts when Moy Toy, LLC was the legal owner and operator of the water system.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

31. Reference the Direct Pre-filed Testimony of Christopher Klein, dated October 1, 2012: being specific to identify individuals representing any entities involved explain

why the \$400,000 loan between Moy Toy, LLC and Laurel Hills, and the \$53,000 loan between Renegade Mountain Timeshares, LLC and Laurel Hills are "at arm's length transactions".

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

32. In reference to Laurel Hills Response to the Customers First Data Request, Response #6 (Revocable License): paragraphs 3 and 6 of the referenced document state that Laurel Hills must receive written permission from Moy Toy, LLC prior to performing many repairs and improvements, including the installation of shutoff valves. Submit all approval requests sent and approved by Moy Toy, LLC for, but not limited to, the installation of all valves, valve boxes and repairs to customer Nugent's and Perry's water connections. If not dated, identify the date each document was submitted and approved (signed).

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does

not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

33. In reference to Laurel Hills Response to the Customers First Data Request, Response #6 (Revocable License): paragraph 4 refers to a Conveyance Agreement; provide a copy of the Conveyance Agreement and any attachments. Also what person (not entity) negotiated the Conveyance Agreement for Moy Toy, LLC and for Laurel Hills

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

34. In reference to Laurel Hills Response to the Customers First Data Request, Response #31: the original data request was for copies of receipts submitted by Darrell McQueen to laurel Hills for reimbursement, two checks in the amount of \$97.68 and \$1517.19 respectively. The data provided to Response 31 consisted of two receipts for \$344.13 and \$122.93 respectively totaling \$456.14. Submit remainder of receipts (\$1147.81) submitted by Darrell McQueen seeking reimbursement by Laurel Hills

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

35. In reference to Laurel Hills Response to the Customers First Data Request, Response # 31; the Preferred Tank and Tower contract submitted by Laurel Hills in response to data request #31 had a firm date of work beginning on the water tower not later than September 1, 2011. An additional hand written note was later added to extend the date of contract execution and initialed by Michael McClung, but was not initialed by Preferred Tank and Tower representatives. Submit a copy of the referenced contract showing the extension of the start date initialed by both parties. Is this contract still in force one year later or was the initial payment of \$3387.50 (10% down) lost or returned as a result of any failure to begin work by September 1, 2011?

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

36. Provide detailed invoices showing hours and work description for all work performed by Renegade Resources, LLC for 2011 and 2012.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

37. Provide detailed invoices showing hours, work description and who (individual) performed the management work Renegade Mountain Timeshares, LLC for all

2011 and 2012 management fees attributed to water operations.

OBJECTION: Laurel Hills objects to this discovery request to the extent that it does not comply with Tenn.R. R. § 1220-1-2.11(6)(a), which permits a party in this proceeding to file only forty (40) discovery requests and the Customers have now propounded more than forty (40) such requests without the prior approval of the Tennessee Regulatory Authority or the Hearing Officer. Without such prior approval, Laurel Hills does not have an obligation to respond to this request. Laurel Hills further objects given that the cost of responding to the additional discovery requests will be born, ultimately, by Laurel Hills' water customers, and therefore it is not reasonable or prudent to respond to additional requests. Laurel Hills further objects to this request to the extent that it is overly broad, unduly burdensome and seeks irrelevant information.

DATED: November 2, 2012

RESPECTFULLY SUBMITTED,



DONALD L. SCHOLLES
BENJAMIN A. GASTEL
Branstetter, Stranch & Jennings, PLLC
227 Second Avenue North
Fourth Floor
Nashville, TN 37201-1631

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing Response was served upon the following via United States 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 2nd day of November, 2012


Benjamin A. Gastel

8:59 AM

10/12/12

Laurel Hills Condominiums POA
A/R Aging Summary
 As of October 12, 2012

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>> 90</u>	<u>TOTAL</u>
OW**BOWLES, MELVIN & MARY ANNE	0.00	0.00	43.20	86.40	861.80	991.40
OW**BURMAN, STEVEN	0.00	0.00	43.20	86.40	1,103.80	1,233.40
OW**BUTZ, JOHN	0.00	0.00	43.20	86.40	1,248.20	1,377.80
OW**CRAWFORD, KENNETH & MARY	0.00	0.00	43.20	86.40	993.60	1,123.20
OW**DUNN, LUKE	0.00	0.00	43.20	86.40	562.00	691.60
OW**ELLIS, ALVIN	0.00	0.00	0.00	43.20	432.00	475.20
OW**FORRESTER, ELAINE	0.00	0.00	0.00	86.40	1,248.20	1,334.60
OW**HOGARTH, ARDIS	0.00	0.00	43.20	86.40	1,248.20	1,377.80
OW**MCMEANS, DON	0.00	0.00	43.20	86.40	950.40	1,080.00
OW**MOY TOY, LLC	0.00	0.00	43.20	86.40	1,123.20	1,252.80
OW**NUNEZ, GUILLERMO & PATRICIA (2)	0.00	0.00	86.40	172.80	2,073.60	2,332.80
OW**PERRY, ROY (2)	0.00	0.00	0.00	172.80	1,157.20	1,330.00
OW**STANDING ROCK, LLC	0.00	0.00	43.20	86.40	1,123.20	1,252.80
OW**WARDEN, JIM	0.00	0.00	43.20	86.40	1,205.00	1,334.60
TOTAL	<u>0.00</u>	<u>0.00</u>	<u>518.40</u>	<u>1,339.20</u>	<u>15,330.40</u>	<u>17,188.00</u>

APPLICATION AND WATER SERVICE CUSTOMER CONTRACT

LAUREL HILLS CONDOMINIUMS PROPERTY OWNERS ASSOCIATION

P.O. Box 25
Crossville, TN 38555

I, _____ (Customer), hereby make application to Laurel Hills Condominiums Property Owners Association (POA) and contract for water service from the POA at the service address listed below.

(1) The Customer shall pay all required fees and charges and comply with all rules, regulations, bylaws and policies adopted by the POA board of directors to connect the Customers' service address to the POA's water system.

(2) The Customer shall pay for water service at the service address in accordance with the rates, rules, regulations and policies adopted by the POA board of directors. In the event the Customer fails to pay all or any portion of its bills for water service by the due date on the bill, the Customer understands and agrees that the POA may terminate water service for nonpayment.

(3) By applying for water service to this service address, I acknowledge and agree that I am the POA's Customer and am responsible for the payment of all water bills and service charges for the service address whether or not I own or live at the service address.

(4) The POA will not accept an application for service from someone other than the Customer unless the person applying on behalf of the Customer provides a power of attorney or other written documentation satisfactory to the POA which authorizes the person making the application to act on behalf of the Customer. The POA reserves the right to have the Customer complete a separate Application and Water Service Customer Contract after the initiation of water service to the service address.

(5) In the event an application for service is made for a service address where a dispute exists about who has the right of occupancy at the service address, the POA will provide service to the applicant provided the applicant is in actual possession of the service address. The POA will continue to provide service to the applicant in actual possession of the service address until the owner of the service address or other person claiming the right to possession of the service address provides the POA a court order or other documentation proving to the POA that such owner or person has the right to possession of the service address and has taken all legal steps necessary to obtain possession of the service address.

(6) The Customer shall pay all outstanding charges to the POA incurred by the Customer for water service at the service address or any other service address before water service will be provided to the Customer.

(7) The Customer agrees to pay all the costs incurred by the POA for the collection of unpaid bills for water service, including the court costs and reasonable attorneys' fees of the POA.

(8) The Customer agrees to abide by all of the POA rules, regulations, bylaws and policies governing the provision of water service, and the Customer understands and agrees that the POA shall have the right to change and revise its rules, regulations, bylaws and policies governing the provision of water service at any time.

(9) The POA shall not be obligated to provide water service to this service address when the POA determines it cannot financially operate the water system or a court or state agency determines the POA is not authorized to provide water service to the service address.

Full Legal Name(s): _____

Street Address (for service): _____

Billing Address (if different): _____

Drivers License No.(s): _____

Social Security No.(s): _____

Phone No. of Service Address: _____ Cell: _____

Phone No. of Billing Address (if different): _____

Work/Day Phone No.: _____ Where: _____

Emergency Phone No. of Relative **NOT** at Service Address: _____

Applicant is: _____ Owner _____ Renter _____ Other _____

**I have read and accepted a copy of the Application and Water Service
Customer Contract**

Signature

Date

Print Name: _____

Effective Date: _____