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BEFORE THE
TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

In Re:

PETITION OF LAUREL HILLS
CONDOMINIUMS PROPERTY
OWNERS ASSOCIATION
FOR A CERTIFICATE OF PUBLIC
CONVEYANCE AND NECESSITY.

Docket No. 12-00030

MOTION FOR ORDER ALLOWING FOR ADDITIONAL DISCOVERY REQUESTS
BY CUSTOMER INTERVENERS

Come now the Customer Interveners, by and through counsel, and move this Court for an Order allowing it to file and have accepted discovery requests in excess of forty (40). Tenn. R.R. Sec. 220-1-2.11 allows a party in a proceeding to file forty (40) discovery requests. The Customer Interveners have filed in excess of forty (40) requests. They hereby ask for permission to serve up to one hundred six (106) discovery requests in this matter which is complex and which requires voluminous discovery. Much of the discovery is necessary because of evasive or incomplete answers filed by Laurel Hills Condominium Property Owners Association ("Laurel Hills") to original discovery.

The Customer Interveners would note that Tenn. R.R. Section 1220-1-1-.05 allows for waiver of rules for good cause shown in a particular proceeding on a Motion of a party except when the rule embodies a statutory requirement. There is no such statutory requirement involved in limitation on discovery requests.

The history involved in this contested case is complicated. This is the type of case where such a limitation on discovery should be amended in order to allow for the further discovery as requested. The discovery as propounded is not overly burdensome and is reasonably calculated to lead to the discovery of admissible proof. Laurel Hills has done so many things in such an inappropriate way that more questions must be allowed in an attempt to get all the facts before the Authority.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read 'MELANIE E. DAVIS', is positioned above a horizontal line.

MELANIE E. DAVIS, Attorney for
Customer Interveners
Tennessee Bar No. 017947
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing MOTION FOR ORDER ALLOWING FOR ADDITIONAL DISCOVERY REQUESTS BY CUSTOMER INTERVENERS has been served upon the following:

David Foster, Chief-Utilities Division
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Nashville, TN 37243-0505

Shiva Bozarth, General Counsel
Tennessee Regulatory Authority
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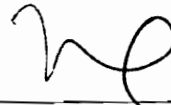
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by mailing a true and accurate copy via U.S. Mail, postage prepaid, this the 1st day of November, 2012

Kizer & Black Attorneys, PLLC:



Melanie E. Davis