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December 5, 2012

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VIA E-MAIL TRANSMISSION: [sharla.dillon@etn.gov](mailto:sharla.dillon@etn.gov)

and

FIRST CLASS MAIL

Sharla Dillon, Clerk

Tennessee Regulatory Authority

460 James Robertson Parkway

Nashville, Tennessee 37243

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

Dear Ms. Dillon:

Please find attached the Direct Testimony of Robert Adkins on behalf of Gary Haiser, et al. I will be submitting an Affidavit of Robert Adkins shortly.

I will be forwarding to you today by first class mail the original and four copies of this document.

Should you have any questions, please give me a call at the direct dial number above.

December 5, 2012

With kindest regards, I am

Very truly yours,

A handwritten signature in cursive script that reads "Melanie E. Davis". The signature is written in dark ink and is positioned above the printed name.

Melanie E. Davis

MED:ps

Enclosure

cc: Monica Smith-Ashford  
Shiva Bozarth, General Counsel  
John Baroni, Attorney  
Donald Scholes, Attorney  
Benjamin Gastel, Attorney  
John Moore, et al

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

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DIRECT TESTIMONY OF ROBERT ADKINS ON BEHALF OF GARY HAISER; JOHN MOORE; GERALD NUGENT; ROY PERRY; JOHN PETERS; JOEL MATCHAK; ROBERT ADKINS; JOE GARNER; TERRY COPE; ROBERT SCHWARTZ; ONUS WILLIAMS; GENE MANERS; MICHAEL KRABOUSANOS; WENDELL BLAIR; LUKE DUNN; DAVID BREG; KENT LATHAM; CORTEZ INVESTMENT GROUP, INC.; JIMMY DOUGLAS; THOMAS BAUER; DONALD SANDLIN; JUDY SCALES PATTERSON; ISAAC GAMBLE; RENEE TODD; RICHARD KNAPP; JOHN CHAMBERS; JOHN P. PETERS REVOCABLE TRUST; AND CUMBERLAND POINT CONDOMINIUM OWNERS ASSOCIATION, OR COLLECTIVELY THE ("CUSTOMERS").

**Pre Filed Direct Testimony of Robert Adkins**

Q. What is your complete name and address?

A. My full name is Robert Adkins and I reside in Renegade Resort at 82 Mountain Laurel Drive, Crab Orchard, Tennessee 37723.

Q. What is your relationship(s) in the matter of Laurel Hills' Amended Petition for a Certificate of Public Convenience and Necessity (CCN) currently before the Tennessee Regulatory Authority (TRA)?

A. I am a full time resident in Renegade Resort, a current water customer of Laurel Hills, a Customer Intervener in TRA Docket 12-00030 currently before the TRA and a Plaintiff in Cumberland County Chancery Court Case 2013-CH-513.

Q. In what capacity will you testify and how will it affect the matter of Laurel Hills' Amended Petition for a Certificate of Public Convenience and Necessity (CCN) currently before the Tennessee Regulatory Authority (TRA)?

A. I will testify as a resident of Renegade Resort and will testify to the quantity of time the office of Laurel Hills, at 17 Mountain Laurel Drive, Crab Orchard, Tennessee (as reported by Laurel Hills to the TRA in the previously filed Rate and Tariff Schedule), is occupied.

Q. Are you familiar with the Laurel Hills' response to data request #6 of the TRA Staff Data Request dated September 26, 2012, where Laurel Hills stated that they staff their Mountain Laurel Drive office with someone five (5) hours per day, five (5) days per week on average?

A. Yes

Q. Can you comment on the validity of this statement?


A. Yes, my current residence of 82 Mountain Laurel Drive is located on the same street and within fifty (50) yards of the office in question and its associated parking lot. During the vast majority of days over the past two months I have been working to construct an addition to my home located at 82 Mountain Laurel Drive. In the process of daily construction, I was able to observe the activity at the Laurel Hills' office on most days. Prior to approximately November 1, 2012, I observed Laura Juarez visiting the office on average, one (1) to two (2) days per week for an average of one (1) to two (2) hours per visit. Occasionally, less than once (1) per week, some other person, usually Michael McClung, would occupy the office for an hour (1) or two (2). Since approximately November 1, 2012, activity at the office has slowed considerably to where, on some weeks, no one has occupied the office at all.

Q. Does this conclude your Direct Testimony?

A. Yes, but I reserve the right to submit additional testimony based on my review of additional information and data submitted in the future.

Gary Haiser, John Moore, Gerald Nugent and  
others as listed above.

By Counsel:



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MELANIE E. DAVIS,  
Tennessee Bar No. 017947  
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Telephone: (865) 980-1625

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing of the DIRECT PRE FILED TESTIMONY OF ROBERT ADKINS has been served upon the following:

David Foster, Chief-Utilities Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
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Jean Stone, General Counsel  
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John J. Baroni, Esq  
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Benjamin A. Gastel, Esq  
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Nashville, TN 37201-1631

by mailing a true and accurate copy via U.S. Mail, postage prepaid, this the 5th day of December, 2012.

Kizer & Black Attorneys, PLLC



Melanie E. Davis