

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF)	
OLD HICKORY WATER, LLC)	DOCKET NO. 12-00039
FOR A CERTIFICATE OF)	
CONVENIENCE AND NECESSITY)	

MOTION FOR APPROVAL OF ALTERNATIVE FINANCIAL SECURITY

Pursuant to Rule 1220-4-13.07 of the Tennessee Regulatory Authority ("Authority"), Old Hickory Water, LLC ("Old Hickory Water"), by and through its counsel, submits this motion and respectfully requests the Authority approve and accept an alternative form of financial security as permitted by Rule 1220-4-13-.07(5) and as set forth in this motion.

1. Old Hickory Water filed its Petition for a Certificate of Public Convenience and Necessity ("CCN") and the accompanying authority to provide water and wastewater utility services formally provided by Hickory Star Water Company, LLC ("HSWC") on May 11, 2012. Due to a foreclosure on the assets of the previous owner and operator of the utility, Old Hickory Water acquired the utility as detailed in such Petition. As a result of the acquisition, Old Hickory Water has provided uninterrupted and continuous service to customers of the utility under the same rates, terms and conditions.

2. Old Hickory Water submitted a bond in the amount of \$25,000. TRA Rule 1220-4-13-.07(2)(a) requires a bond in the amount of \$20,000 or one hundred percent (100%) of the amount of gross revenue reported on the most recent UD20. While Old Hickory Water is completing financial information for the Authority, Authority staff is of the opinion that

the Authority, Authority staff is of the opinion that gross revenues are approximately \$84,355 and requested a new bond in that amount or file for approval of an alternative amount pursuant to TRA Rule 1220-4-13-.07(5). See Data Request of February 28, 2013, Request #5. This motion is a result of such request.

3. Old Hickory Water has the requisite financial stability to operate the utility, as demonstrated in its Petition and subsequent filings. Old Hickory Water has been operating the utility since acquisition in 2011 without any financial problems. Since acquisition, customers of both the water and wastewater systems have been served continuously and without rate increases. The Authority is assured of financial security with the \$25,000 bond and the financial stability of Old Hickory Water.

4. The \$25,000 bond filed by Old Hickory Water is ample security.

WHEREFORE, Old Hickory Water respectfully requests the Authority to:

1. Approve the present \$25,000 bond as alternative financial security.
2. Grant any other relief as the Authority may deem just and proper.

Respectfully submitted,



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