### filed electronically in docket office on 03/11/16

# G. Everett Sinor, Jr. Attorney at Law

March 11, 2016

Ms. Sharla Dillon Dockets and Records Manager Tennessee Regulatory Authority Andrew Jackson Building 502 Deaderick Street, Fourth Floor Nashville, Tennessee 37243

RE: Filing of Responses to Discovery Requests & Letter

#### DELIVERY BY UNITED STATES FIRST CLASS MAILS AND ELECTRONIC MAIL

Deat Ms. Dillon:

Please find enclosed herewith an original and four (4) copies of the following:

- 1. The Response of Laurel Hills Water System in Receivership to the Consumer Advocate and Protection Division of the Attorney General and Reporter's Office First Discovery Request, for filing in Docket No. 16-00012;
- 2. The Response of Laurel Hills Water System in Receivership to the Consumer Advocate and Protection Division of the Attorney General and Reporter's Office Second Discovery Request, for filing in Docket No. 16-00012; and,
- 3. A letter from Robert E. Moore, Jr., Chief Operations Officer of Receivership Management, Inc., the Court Appointed Receiver for Laurel Hills Water System in Receivership, for filing in Docket Nos. 12-00077 and 15-00118.

Should you have any questions, please do not hesitate to contact me.

Thanking you for your consideration of this matter, I am,

Enclosure

ec: Shiva K. Bozarth, Esq.
Donald Scholes, Esq. and Benjamin Gastel, Esq.
Melanic Davis, Esq.
Vance Broemel, Esq.
Roger York, Esq.

Attorney at Law

March 10, 2016

Tennessee Regulatory Authority 502 Deaderick Street Nashville, Tennessee 37243

RE: Letter in Support of Laurel Hills Water Service Customers

## TO BE FILED ELECTRONICALLY IN DOCKET NOS. 12-00077 & 15-00118

#### Ladies and Gentlemen:

As you know, the Laurel Hills Water System [hereinafter the "Water System"] has been placed into receivership by order of the Cumberland County Chancery Court, dated October 26, 2015. The previous owners and operators of the Water System, Laurel Hills Condominiums Property Owners' Association, agreed to the placement of the Water System into receivership in a Settlement Agreement entered into with the Tennessee Regulatory Authority.

That Settlement Agreement provided for a number of conditions and/or restrictions to be placed upon the conveyance of the Water System's assets and use rights, some of which pertain to rights not related to the delivery of potable water to customers. The First Addendum to said Settlement Agreement specifically speaks to the ability of Cumberland County to utilize the water tower for E911 transmission purposes, which certainly bearing on the public's health.

The receivership estate was created to benefit the customers of the Water System, and the Receiver views its role in that light. Accordingly, the Receiver supports efforts to benefit the customers of the Water System and improve the public health of the community at large.

Thank you for your consideration of this matter.

Yours sincerely,

Robert E. Moore, Jr. (BPR #013600)

Chief Operations Officer

Receivership Management, Inc.

Receiver for Laurel Hills Water System in Receivership

ec: John Moore