

BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

In Re:

SHOW CAUSE PROCEEDING AGAINST  
LAUREL HILLS CONDOMINIUMS PROPERTY  
OWNERS ASSOCIATION FOR ALLEGED  
VIOLATIONS OF TENN. CODE ANN. 65-4-201,  
65-4-301(A), 65-5-102, 65-4-101 AND/OR  
65-4-103 AND 65-4-115

Docket No. 12-00077

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PETITION TO INTERVENE

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Comes now Eagles Nest, LLC, a Nevada limited liability company authorized to do business in Tennessee, pursuant to T.C.A. Sec. 4-5-310 and T.C.A. Sec. 65-2-107 and files this Petition to Intervene in the above-styled matter by and through counsel.

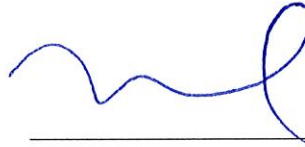
Eagles Nest, LLC is owner of property on Renegade Mountain. It seeks to obtain water services from Laurel Hills Condominiums Property Owners Association ("Laurel Hills") as a customer of the water system. Earlier this year, it sought preliminary plat approval from the Cumberland County Planning Commission for a subdivision of its property on Renegade Mountain. The Planning Commission advised Eagles Nest, LLC to first verify water pressure on or near its property and to submit this information as part of its application process. This would have required checking a line of Laurel Hills.

A representative of Eagles Nest, LLC went to Renegade Mountain to attempt to perform such tests. The Eagles Nest, LLC representative was denied access by

Darrell McQueen, an agent for Laurel Hills. This denial of access for the needed water pressure testing has resulted in significant delay in the construction work contemplated by Eagles Nest, LLC because its preliminary plat could not be considered by Planning Commission. Eagles Nest, LLC otherwise wishes to connect to the water system and obtain water from Laurel Hills or its successor. As such, Eagles Nest, LLC asks for permission to intervene so that it can address its concerns regarding Laurel Hills and to request relief that will allow it to proceed to obtain the necessary water pressures testing, to obtain taps, if desired, and become a water customer of Laurel Hills even during the pendency of this proceeding.

Eagles Nest, LLC submits that it is in the interest of justice and the orderly and prompt conduct of these proceedings that it be allowed to intervene.

RESPECTFULLY SUBMITTED,



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MELANIE E. DAVIS, Attorney for  
Customer Interveners  
Tennessee Bar No. 017947  
Kizer & Black Attorneys, PLLC  
329 Cates Street  
Maryville, Tennessee 37801  
Telephone: (865) 980-1625

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing of PETITION TO INTERVENE has been served upon the following:


Shiva Bozarth, General Counsel  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Vance Broemel, CPA  
Assistant Attorney General  
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Benjamin A. Gastel, Attorney  
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Nashville, TN 37201-1631

by mailing a true and accurate copy via E-Mail transmission and U.S. Mail, postage prepaid, this the 18th day of November, 2014.

Kizer & Black Attorneys, PLLC:



BY: \_\_\_\_\_  
Melanie E. Davis