BEFORE THE TENNESSEE REGULATORY AUTHORITY

2014 APR - 1 PM 1:59

IN RE:)	T.R.A. DOCKET R
CARTWRIGHT CREEK, LLC, REQUEST TO UTILIZE ALTERNATIVE FINANCIAL SECURITY PURSUANT TO TENN. COMP. R. & REGS. 1220-4-13-07(5))	DOCKET NO. 14-0034

JOINT PETITION FOR ALTERNATE SECURITY

Comes now the Tennessee Regulatory Authority Compliance Division, represented by the Party Staff, and Cartwright Creek, LLC. ("Cartwright") who respectfully request that the Tennessee Regulatory Authority ("TRA" or the "Authority") approve the attached Agreement between the parties which provides a mechanism by which Cartwright can fulfill its obligation to maintain adequate financial security consistent with Tenn. Code Ann. § 65-4-201(e) and Tenn. Comp. R. & Reg. 1220-4-13-.07.

Facts

- 1. Cartwright is a wastewater treatment system operating in Williamson County, Tennessee.
- Since June, 2011, Cartwright has operated without a financial security fund which is required by the TRA rules.
- 3. Because of the company's financial condition, Cartwright cannot reasonably obtain a financial security fund equal to the maximum amount required by TRA Rule 1220-4-13-07.
- 4. The purpose of the financial security required by the TRA rules is to ensure that the Authority has sufficient funds available to operate the utility for the benefit of the customers in the event that the Authority assumes control of the utility.

5. Cartwright is prepared to provide the Authority with customer information that will allow the Authority to bill customers for services, thereby reducing substantially the amount needed in the security fund under the TRA rules. In light of this agreement, the parties submit that a letter of credit in the amount of \$20,000.00 is sufficient to allow the Authority to operate the system.

WHEREFORE, the Party Staff and Cartwright respectfully request that the Authority approve the Agreement attached to this Joint Petition and give Cartwright 60 days from the approval of this agreement to appear before the Authority with the Letter of Credit described in the Agreement.

Respectfully submitted,

Shiva K. Bozarth, BPR No.22685

Legal Counsel

Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Henry Walker (B.P.R. No. 000272)
Bradley Arant Boult Cummings, LLP

1600 Division Street, Suite 700

Nashville, TN 37203 Phone: 615-252-2363 Email: hwalker@babc.com