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February 3, 2016

Chairman, Tennessee Regulatory Authority
ATTN: Sharla Dillon, Docket Manager
502 Deadrick Street, 4th Floor
Nashville, TN 37243

Re: Petition of Tennessee Wastewater Systems, Inc. for Approval of Capital
Improvement Surcharges and Financing Arrangements
Tennessee Regulatory Authority, Docket No. 14-00136

Dear Sharla:

Please find enclosed for filing an original and thirteen copies of The Data Request No. 1 on behalf of Summit View Homeowners' Association regarding the above-captioned matter submitted pursuant to TRA Rule 1220-1-2-.11, as a party to this contested matter. If you have any questions, please feel free to contact me.

Sincerely,



Arthur G. Seymour, Jr.
Kevin A. Dean
FRANTZ, McCONNELL & SEYMOUR, LLP

KAD:dmm
Enclosure

cc: Rick Tucker (Via Email w/enc.)
Bill Waldrep (Via Email w/enc.)
Henry Walker, Esq. (Via U.S. Mail w/enc.)
Rachel A. Newton, Esq. (Via U.S. Mail w/enc.)
Charles B. Welch, Esq. (Via U.S. Mail w/enc.)

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IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

IN RE:

**PETITION OF TENNESSEE WASTEWATER
SYSTEMS, INC., FOR APPROVAL OF
CAPITAL IMPROVEMENT SURCHARGES
AND FINANCING ARRANGEMENTS**

No: 14-00136

SUMMIT VIEW HOMEOWNERS' ASSOCIATION'S DATA REQUEST NO. 1

The following questions pertain to the proposed project at Summit View Resort near Pigeon Forge, Tennessee.

1. Provide a true and exact copy of Tennessee Wastewater Systems, Inc.'s (TNWI) maintenance records for the Summit View Resort System¹ from 2007 to the present date.

RESPONSE:

2. Describe in detail how TNWI has maintained the System at Summit View Resort from 2007 forward and with what frequency (monthly, etc.) maintenance was performed and include a description of the procedures utilized for inspection and operation for each of the System's component parts.

RESPONSE:

3. On page 2 of the Petition you (TNWI) filed in this case, beginning on line 3 you have represented that "the actual usage, however, runs as high as 18,000 gallons per day." Provide all supporting information and documentation for your assertion that the usage at the Summit View Resort has ever run as high as 18,000 gallons per day and list each and every date on which actual usage has exceeded 10,000 gallons per day. Further, describe in detail the

ORIGINAL

equipment used to take the measurements upon which you rely, including but not limited to the manufacturer of the gauging instruments, the brand of each instrument, when each instrument was installed, and all maintenance records and/or records of calibration of the equipment.

RESPONSE:

4. Describe in detail the basis for determining the design size of 18,500 gpd given the historical flow records do not suggest the design flow needs that amount of capacity.

RESPONSE:

5. Was any alternative design studies (or any other alternative corrective action) conducted to determine the most feasible solution(s) with respect to the Summit View Resort System? If not, why not? If so, please describe in detail and produce a copy of all documentation evidencing such a study (or studies) and any cost-benefit analyses that were performed.

RESPONSE:

6. On page 3 of the Petition you (TNWI) filed in this matter, you have listed the estimated total cost of the project as \$330,000.00; produce all supporting documentation for this figure, including but not limited to all requests for proposals for bids that were sent out and copies of all bids submitted to you for this project.

RESPONSE:

7. Produce a true and exact copy of the sewage system maintenance and management contract with Summit View Resort entered into as of the 17th day of January, 2007, including all Exhibits thereto (including but not limited to the referenced Exhibit 1).

RESPONSE:

¹ All references to the "System" shall include, but are not limited to, the STEP tanks, the collection network, the treatment system, and the drip dispersal field.

This the 3rd day of February, 2016.



Arthur G. Seymour, Jr. (BPR No. 1569)

Kevin A. Dean (BPR No. 26267)

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Attorneys for Summit View Homeowners'
Association

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing document has been served this 3rd day of February, 2016, upon all counsel or parties as listed below at interest in this cause by delivering a true and exact copy to the offices of said counsel or parties or by placing a copy in the United States mail addressed to said counsel or parties at his/her office, with sufficient postage to carry it to its destination, or by special overnight courier; if the foregoing document has been electronically filed with the Court, this service has been made only upon counsel or parties to whom the Court does not furnish electronic copies of filings.

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