

IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE

IN RE:	)	
	)	
PETITION OF TENNESSEE	)	
WASTEWATER SYSTEMS, INC., FOR	)	DOCKET NO. 14-00136
APPROVAL OF CAPITAL	)	
IMPROVEMENT SURCHARGES AND	)	
FINANCING ARRANGEMENTS	)	

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SECOND SUPPLEMENTAL RESPONSE TO DISCOVERY REQUESTS  
FROM THE CONSUMER ADVOCATE

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Tennessee Wastewater Systems, Inc. ("TWSI") submits the following second supplemental responses to certain Discovery Requests from the Consumer Advocate:

**SECOND SUPPLEMENTAL RESPONSE 21:**

Jeremy Dison, described as a "related entity" in the initial Response, is the step-son of Tom Pickney, a part-owner of Adenus.

TWSI has previously provided the price Dison paid for the land needed to expand the wastewater system at Summit View, the date of Dison's purchase, and a copy of Dison's contract to sell the land to TWSI at cost plus expenses, including an 8% return.

Both the agreement with Dison and a similar agreement between TWSI and Bob Pickney to purchase land at Smoky Village were arranged to insure that TWSI would be able to purchase these parcels if the TRA approves the requested bank loan and related surcharges.


In each case, additional land is needed to expand the wastewater treatment systems at Summit View and Smoky Village. Based on TWSI's experience, it is often difficult to

acquire land adjacent to an existing treatment system after the surrounding development has been built. Upon learning that land at these sites was being offered for sale and after discussing the matter with outside counsel, TWSI arranged for related entities, Bob Pickney and Jeremy Dison, to purchase the properties and hold them until TWSI receives the necessary regulatory approvals. Had TWSI not made those arrangements, TWSI might not be able to purchase the land following TRA approval or might not be able to purchase the land for the same price.

Respectfully submitted,

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By: \_\_\_\_\_

  
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