

IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE

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IN RE:

PETITION OF TENNESSEE  
WASTEWATER SYSTEMS, INC. TO  
AMEND ITS CERTIFICATE OF  
CONVENIENCE AND NECESSITY

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DOCKET NO. 15-00025

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**PROPOSED SECOND SUPPLEMENTAL DISCOVERY REQUEST**

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To: Tennessee Wastewater Systems, Inc.  
c/o Henry Walker  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203

This Discovery Request is hereby served upon Tennessee Wastewater Systems, Inc., ("TWSI" or "Company"), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. We request that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Erin Merrick, within one week of the TRA's granting the Consumer Advocate's *Motion for Leave to File Second Supplemental Discovery Request*.

**PRELIMINARY MATTERS AND DEFINITIONS**

This Supplement Discovery Request incorporates the same Preliminary Matters And Definitions as set forth in *Request of the Consumer Advocate and Protection Division of the Attorney General's Office for Interrogatories and Production of Documents*, filed on May 26,

2015, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by TWSI that would make a prior response inaccurate, incomplete, or incorrect.

**SUPPLEMENTAL DISCOVERY REQUEST**

1. If TWSI's proposed amendment to its CCN is granted for The Enclave at Dove Lake, will TWSI agree not to sell, market, or otherwise deal in capacity at The Enclave at Dove Lake—including all dealings directly or indirectly in capacity with affiliates—or allow or permit the sale, marketing or declining in capacity by an affiliate without TRA approval?

**RESPONSE:**

RESPECTFULLY SUBMITTED,

*Erin Merrick* by *Vance*  
ERIN MERRICK (BPR# 033883)  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
(615) 741-8722  
(615) 741-1026 FAX  
*Knoemel*

Dated: 11 June, 2015.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Henry Walker  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
hwalker@babco.com

This the 11 day of June, 2015.

Erin Merrick by  
ERIN MERRICK  
Vance  
Broomel