

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

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<b>IN RE:</b>	)	
	)	
<b>PETITION OF TENNESSEE</b>	)	<b>DOCKET NO. 15-00071</b>
<b>WASTEWATER SYSTEMS, INC.,</b>	)	
<b>FOR APPROVAL OF LOANS</b>	)	

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**RESPONSE TO CONSUMER ADVOCATE'S REPLY TO TWSI'S OPPOSITION TO  
CONSUMER ADVOCATE'S PETITION TO INTERVENE**

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Tennessee Wastewater Systems, Inc. ("TWSI") filed a petition in this matter to gain TRA approval for certain financing arrangements enabling the company to purchase new vehicles and land. The approval of loans is not a novel issue before the TRA and one that is capable of being resolved without convening a contested case. The Consumer Advocate is concerned about the effect these loans may have on the consumer, however no rate increase or other assessment to the consumer is being sought at this time. If and when TWSI seeks a rate increase, that would be an appropriate time for the Consumer Advocate to petition to intervene.

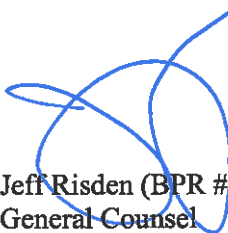
The Consumer Advocate seeks to compare the issues in Docket 14-00136 with the loan request here; however these issues are like comparing apples to oranges. Docket 14-00136 involves a request for loan approval to fix four wastewater systems that have failed under extraordinary circumstances and require significant funding to repair. TRA approval of the loans is necessary per §65-4-112 and given the significant amount of financing involved, TWSI has asked for permission to assess the ratepayers for the cost of the loans, which the TRA needs to approve as well, pursuant to §65-5-101 and 103. Statements made regarding loans and assessments in Docket 14-00136 are specific to the issues involved and questions asked in that docket and have no applicability to the financing requests in this one.

The issue in this docket is a simple matter involving the approval of routine financial arrangements for vehicles and land necessary for TWSI to conduct its ordinary business. TWSI is not seeking an increase in customer rates, at this time, related to the loans in this petition. TWSI is seeking speedy resolution to this petition without incurring any further cost or delay.

For these reasons, TWSI respectfully requests the TRA to deny the Consumer Advocate's Petition to Intervene.

Dated: September 11, 2015

Respectfully Submitted,



Jeff Ridsen (BPR # 32769)  
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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:

Erin Merrick, Esq.  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, TN 37202

This the 11<sup>th</sup> day of September, 2015

Jeff Ridsen

