IN THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

IN RE:))))		TRA Docket Office 12/3/15
PETITION OF TENNESSEE WASTEWATER SYSTEMS, INC., FOR APPROVAL OF LOANS		DOCKET NO. 15-00071	

TENNESSEE WASTEWATER SYSTEMS, INC.'S SUPPLEMENTAL RESPONSE TO THE REQUEST OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION OF THE ATTORNEY GENERAL'S OFFICE FOR INTERROGATORIES AND PRODUCTION OF DOCUMENTS

FIRST DISCOVERY REQUESTS

In your Data Response filed September 3, 2015, you state at Answer 8 that the newly purchased trucks (i.e., two 2014 Ford F250 pickup trucks and two 2015 Chevrolet Silverado 2500 pickup trucks) "are replacing older trucks." The following questions pertain to that replacement.

1. Please state the number of trucks in the TWSI fleet prior to purchasing the new trucks and the total number of trucks in the TWSI fleet following this purchase.

RESPONSE: There were four (4) trucks existing in the TWSI fleet prior to purchasing the new trucks. These trucks were formerly owned by Adenus Operations. They were transferred to TWSI for the exclusive use of the utility in June 2015. There are a total of four (4) new trucks between the original and amended petitions (not three (3) as stated in the previous response). This brings the total number of trucks in the TWSI fleet to eight (8) trucks.

19. How much will the total capacity at the Dyers Hollow facility increase once the

new drip field is completed? How much of this capacity will TWSI customers

use, and how much of this capacity will be used to fulfill Adenus Capacity's

contractual obligations to Walmart Express under the Commercial Sewer Service

Agreement?

RESPONSE: The drip field has been completed and total capacity is 0.0597

MGD. Adenus Capacity has no obligation to Walmart Express. Adenus

Capacity sold Walmart one tap. The Commercial Sewer Service Agreement

is with TWSI who is obligated to serve and provide Walmart with capacity of

300 gallons per day.

Respectfully submitted,

Jeff Risden (BPR# 032769)

General Counsel

Adenus Group, LLC

849 Aviation Parkway

Smyrna, Tennessee 37179

(615) 220-7171

Dated: December 3, 2015.

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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
(615) 741-8722

This the 3rd day of December, 2015.

Jeff Risden