

IN RE: )  
)  
PETITION OF LAUREL HILLS WATER SYSTEM ) DOCKET NO. 16-00012  
IN RECEIVERSHIP FOR APPROVAL OF )  
ADJUSTMENTS OF IT RATES AND CHARGES )  
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**DISCOVERY REQUESTS TO CONSUMER ADVOCATE**

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Comes now Tennessee Regulatory Authority (“TRA” or “Authority”) Staff acting as a Party (“Party Staff”) with the following discovery requests to the Consumer Advocate and Protection Division of the Attorney General’s Office (“Advocate”).

**Request for Production**

1. Produce any and all consumer complaints or other contacts from consumers received by the Advocate in relation the operation of the Renegade Mountain water system since October 1, 2015.
2. Provide a copy of the Advocate’s plan to ensure payments to a receiver if the TRA receives permission from the Chancery Court of Cumberland County to be released from the obligation to pay for receivership costs.
3. Provide a copy of the responses filed by the Advocate in response to Party Staff’s Motion to Appoint Receiver filed in Cumberland County Chancery Court, Docket No. 2012-CH-560.
4. Provide a copy of any transcript or other demonstration that the Advocate presented any

argument or evidence at the October 26, 2015, hearing on the Motion to Appoint Receiver.

5. Provide a copy of all expert or other reports, analysis, memoranda or other documentation stating or indicating that the costs and expenses included in the Receiver's Petition for Emergency relief filed in this docket are not just and reasonable.

**Request for Admissions**

6. In TRA Docket No. 07-00081 the Advocate agreed that certain environmental costs were extraordinary expenses and that the company should be allowed recovery of those extraordinary expenses.

Admit or Deny

7. In TRA Docket No. 11-00180 the Advocate agreed that certain expenses related to the 2010 floods were extraordinary expenses and that the company should be allowed recovery of those extraordinary expenses.

Admit or Deny

8. In TRA Docket No. 10-00014 Kingsport Power Company requested recovery of certain storm related expenses that the company alleged were "outside the norm" and the Advocate did not oppose that recovery.

Admit or Deny

9. In TRA Docket No. 12-00051 Kingsport Power Company requested recovery of certain storm related expenses that the company alleged were unusual and the Advocate did not oppose that recovery.

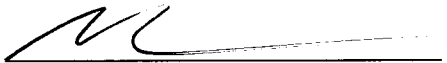
Admit or Deny

**Interrogatories**

10. Please explain whether or not the appointment of a receivership is an extraordinary event.
11. Please explain whether or not the costs, expenses, and hourly rates of a receivership for the Renegade Mountain water utility are extraordinary expenses.
12. Please state what if any basis the Advocate will have to argue that the costs, expenses, and hourly rates of the receiver should not be included in rates if the Cumberland County Chancery Court finds that the October 26, 2015, Order Appointing Receiver allows for the inclusion of receivership costs, expenses, and hourly rates in utility rates.

13. Please identify what sources of funds the TRA should draw upon to pay for the costs, expenses, and hourly rates of the receiver.

Respectfully Submitted,



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