

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF LAUREL HILLS WATER
SYSTEM IN RECEIVERSHIP FOR
APPROVAL OF ADJUSTMENTS OF ITS
RATES AND CHARGES**

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DOCKET NO. 16-00012

**SECOND DISCOVERY REQUEST OF THE CONSUMER PROTECTION AND
ADVOCATE DIVISION TO LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP**

To: Laurel Hills Water System in Receivership
c/o Robert E. Moore, Jr., Esq.
Receivership Management, Inc.
1101 Kermit Drive, Suite 735
Nashville, TN 37217

This Discovery Request is hereby served upon Laurel Hills Water System in Receivership, ("LHWS"), 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 Protection and Advocate Division, 315 Deaderick Street, 19th Floor, UBS Tower, Nashville, Tennessee 37243, c/o Erin Merrick, on or before 4:00 p.m. Central time, March 15, 2016.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate the same Preliminary Matters And Definitions as set forth in the *First Discovery Request of the Consumer Protection and Advocate*

Division to Laurel Hills Water System in Receivership filed March 3, 2016, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by LHWS which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

1. Please state whether there is any provision in the *Order Appointing Receiver* that empowers the Receiver to petition the TRA or other appropriate tribunal for an increase in rates to recover "Receivership fees and costs," as defined in the *Order Appointing Receiver*. If so, cite that provision.

RESPONSE:

2. State whether, prior to the filing of the *Petition for Emergency Relief*, the TRA Party Staff discussed with the Receiver whether Receivership fees and costs should be, or could be, included in customer rates. If so, provide a narrative of those discussions, including an account of who first proposed the inclusion of Receivership fees and costs in proposed rates and the basis for that inclusion.

RESPONSE:

RESPECTFULLY SUBMITTED,


ERIN MERRICK (BPR #033883)

Assistant Attorney General

VANCE L. BROEMEL (BPR #011421)

Senior Counsel

Consumer Protection and Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

(615) 741-8722

(615) 741-1026 – FAX

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:

Robert E. Moore, Jr., Esq.
Receivership Management, Inc.
1101 Kermit Drive, Suite 735
Nashville, TN 37217
Phone: 615-370-0051
Fax: 615-373-4336
Email: rmoore@receivermngmt.com

G. Everett Sinor, Jr.
Attorney at Law
3504 Robin Road
Nashville, Tennessee 37204
Phone: 615-969-9027
Email: Everett.Sinor@gmail.com

LHWS Water System in Receivership
Post Office Box 25
Crossville, Tennessee 38555

Tennessee Regulatory Authority ("Party Staff")
Shiva Bozarth, Esq.
502 Deaderick Street
Nashville, TN 37243

on this the 8th day of March, 2016.


Erin Merrick