

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

IN RE:)	
PETITION OF LAUREL HILLS WATER)	
SYSTEM IN RECEIVERSHIP FOR)	DOCKET NO. 16-00012
APPROVAL OF ADJUSTMENTS OF ITS)	
RATES AND CHARGES)	

**CONSUMER PROTECTION AND ADVOCATE DIVISION'S
MOTION TO DISMISS CLAIMS (a) AND (b)**

Comes the Consumer Protection and Advocate Division of the Office of the Attorney General ("Consumer Advocate") pursuant to TRA Rule 1220-1-2-.03 and moves the Tennessee Regulatory Authority to dismiss or deny the Receiver's claims or proposal for any rates that include the recovery of Receivership fees and costs as set forth in the *Petition for Emergency Relief*. In its *Petition for Emergency Relief*, Laurel Hills Water System in Receivership ("Receiver"), has set forth three different proposed rate increases for consumers, distinguished therein as (a), (b), and (c). Two of these three proposed rate increases, options (a) and (b), seek the immediate recovery of Receivership fees and costs in consumers' rates. The recovery of Receivership fees and costs in consumers' rates is contrary to the *Order Appointing Receiver* issued by the Chancery Court of Cumberland County on October 26, 2015, No. 2012-CH-560. Accordingly, the Receiver's claims or proposals for any rates that included the recovery of Receivership fees and costs in consumers' rates should be dismissed.

RESPECTFULLY SUBMITTED,



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Dated: 3/21/16

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:

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This the 21st day of March, 2016.



Erin Merrick