

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF TENNESSEE)
WASTEWATER SYSTEMS, INC.,) **DOCKET NO. 16-00139**
FOR APPROVAL OF ADJUSTMENT)
OF ITS RATES AND NEW TARIFF)

**MOTION FOR EXTENSION OF TIME TO FILE
CONSUMER ADVOCATE'S PRE-FILED DIRECT TESTIMONY
AND REQUEST FOR EXPEDITED CONSIDERATION OF THIS MOTION**

Comes the Consumer Protection and Advocate Division of the Office of the Attorney General (Consumer Advocate), and hereby requests an extension of time until May 31, 2017, to file its Pre-Filed Direct Testimony in the above-captioned docket.

In support of this Motion and Request for Expedited Consideration, the Consumer Advocate would show:

1. On Friday, January 13, 2017, the Consumer Advocate sent Tennessee Wastewater Systems, Inc. (TWSI) its **First Discovery Request**. The number of requests was large due to TWSI's Petition lacking the necessary and appropriate documentation required by common practice to be provided with a general rate case petition. Accordingly, the Consumer Advocate contemporaneously filed a Motion for Leave to Issue More than Forty Discovery Requests due in part to the lack of records such as income statements, balance sheets, general ledgers or other such accounting documents supporting the Petition. Further, TWSI is a subsidiary of Adenus Group LLC which owns other wastewater systems. The subsidiary/affiliate, multi-state structure and operations among all of the related entities and individuals requires more extensive discovery.

2. TWSI began informally providing responses to the Consumer Advocate's First Discovery Request on Thursday, January 19, 2017. On Friday, February 3, 2017, TWSI responded formally to the Consumer Advocate's First Discovery Request.

3. The Tennessee Public Utility Commission (TPUC) staff sent TWSI its **First Data Request** on Thursday, February 2, 2017.

4. On February 8 and 17, 2017, TWSI filed supplemental responses to the Consumer Advocate's First Discovery Request. The supplemental responses provided responsive documents inadvertently left out of the exhibits previously filed in the response.

5. TWSI provided a response to TPUC staff's First Data Request on Friday, February 17, 2017.

6. On Wednesday, March 8, 2017, the Parties met, in person, to discuss issues related to the Consumer Advocate's Discovery Requests. During this meeting, the Consumer Advocate advised TWSI that it would be using the test year of 2016 rather than TWSI's proposed test year of 2015.

7. On Tuesday, March 14, 2017, the Consumer Advocate filed a records request with the TPUC related to this Docket regarding the topics of credit card convenience fees and customer complaints. Based on the Petition, the Company provided no notice that the credit card convenience fee was already being collected. The Consumer Advocate has not been able to support, on any basis, TWSI collecting the fee under the existing tariff. During the March 8, 2017, meeting on discovery matters, TWSI stated that they were already assessing the fee and described their interaction with the Authority on this topic recently and in the past prior to implementing the fee.

8. On Friday, March 17, 2017, the Consumer Advocate sent TWSI its **Second Discovery Requests** and on Friday, March 17, 2017, TWSI responded formally to the Consumer Advocate's Second Discovery Request.

9. On Thursday, March 23, 2017, TWSI provided a supplemental response to the Second Discovery Request providing responsive documents inadvertently left out of the exhibits previously filed in the response.

10. On Friday, March 24, 2017, TPUC responded to the Consumer Advocate's Tenn. Code Ann. § 65-4-118 Records Request.

11. The Consumer Advocate sent TWSI an **Informal Third Discovery Request** on Friday, April 7, 2017. A copy is attached as Exhibit A. This Discovery Request includes clarification of previous discovery responses; supplemental information on previous discovery responses; identifying non-responsive discovery responses; detailed questions regarding currently assessed credit card convenience fees; and detailed questions regarding business transactions with entities that appear to involve a relative of a director of Adenus Group, LLC.

12. The Consumer Advocate sent TWSI an **Informal Fourth Discovery Request** on Tuesday, April 11, 2017. A copy is attached as Exhibit B. This Discovery Request includes clarification of previous discovery responses; supplemental information on previous discovery responses; a request for workpapers in Excel format; and requests on monthly numbers for various charges (*e.g.*, nonpayment charges, reconnection charges, disconnection charges, returned check charges, etc.).

13. On Tuesday, April 11, 2017, the Parties had a conference call to discuss issues related to the Consumer Advocate's Discovery Request. During this conference call, the Consumer Advocate advised TWSI that it would be sending a fifth request to them.

14. The Consumer Advocate sent TWSI an **Informal Fifth Discovery Request** on Monday, April 24, 2017. A copy is attached as Exhibit C. This Discovery Request includes clarification of previous discovery responses; supplemental information on previous discovery responses; identifying non-responsive discovery responses; requesting documents in Excel format; and requesting assistance in reconciling TWSI's ledger expenses with invoices provided in previous responses.

15. The TPUC staff sent TWSI a **Second Data Request** on Tuesday, April 25, 2017. In addition to its own questions, the request included clarification on some of the Consumer Advocate's previous discovery requests.

16. The Consumer Advocate sent TWSI an **Informal Sixth Discovery Request** on Friday, April 28, 2017. A copy is attached as Exhibit D. This Discovery Request includes clarification of previous discovery responses focusing primarily on reconciling TWSI's billing revenue with the existing tariffs for commercial customers.

17. The Consumer Advocate sent TWSI a **follow-up inquiry** on Monday, May 8, 2017. A copy is attached as Exhibit E. This inquiry requests assistance in reconciling TWSI's billing revenue provided during previous discovery responses with the existing tariffs' commercial cabin customers.

18. TWSI provided a response to TPUC staff's Second Data Request on Tuesday, May 9, 2017.

19. None of the Informal Discovery Responses that the Company has sent to the Consumer Advocate have been filed, and thereby provided, to the TPUC within the 3-day deadline that has been applied in every other docket (that the Consumer Advocate is aware of) to informal discovery responses.

20. The Parties set up a conference call on Thursday, May 11, 2017, to discuss the Consumer Advocate's request for an extension of time and the filing of informal discovery responses. In that telephone conference, the Parties could not agree upon a revised procedural schedule. In addition, the Parties were unable to agree on the manner of filing the informal discovery responses.

21. After further discussions on the issue of filing informal discovery responses on Friday, May 12, 2017, TWSI agreed that informal inquiries relevant to the rate case should be filed with TPUC after review by its counsel. TWSI noted that such responses would be identified as informal, uncertified responses.

22. The Consumer Advocate respectfully suggests that it will need more time than is currently allowed under the existing procedural schedule to analyze TWSI's responses to TPUC's data requests and the Consumer Advocate's Informal Discovery Requests. It is not realistic or reasonable to even assume that the volume of data responses provided by the Company can be analyzed by the Consumer Advocate and its expert and testimony prepared by its expert by Wednesday, May 17, 2017. To deny the Consumer Advocate the additional time would be a disservice to consumers and to the TPUC.

23. The Consumer Advocate believes that it would be helpful to the TPUC to have the Consumer Advocate's expert present a complete case to it. By "complete case," the Consumer Advocate means a case that not merely opposes selected parts of the TWSI's incomplete and confusing Petition, but one that presents a reasoned, carefully thought out case that sets forth a just and reasonable rate to be paid by the Company's consumers and, to the extent that is possible in this Docket, provides an alternative number for the numbers presented by TWSI.

24. In order to accomplish the analysis and testimony that would enable it to present a complete case and to be as helpful to the TPUC as possible, the Consumer Advocate needs the additional time requested, as well as continues to need, among other things, information regarding:

- The currently assessed credit card convenience fee which is not part of the existing tariff but proposed in the new Petition;
- Clarification on business transactions with entities that appear to involve relatives of a director of Adenus Group, LLC; and
- Reconciliation of TWSI's billing revenue and its current tariff.

25. Accordingly, the Consumer Advocate's request for an extension of time is reasonable and benefits all parties and the TPUC.

26. The Consumer Advocate has spoken several times with TWSI concerning the extension of time requested in this Motion. And the Consumer Advocate appreciates the willingness of counsel for TWSI to discuss a revised procedural schedule. Nevertheless, the Parties spoke most recently on Thursday, May 11, 2017 and, unfortunately, could not come to an agreement.

27. In view of the immediacy of the current deadline for the filing of the Direct Testimony of the Consumer Advocate's expert and, further, to enable the efficient utilization of resources and to facilitate planning in this Docket, the Consumer Advocate asks for expedited consideration of this Motion.

In view of the foregoing, the Consumer Advocate respectfully requests that the Hearing Officer extend the due date for the referenced Intervenor Pre-Filed Testimony until Wednesday, May 31, 2017, and that the remainder of the procedural schedule be amended in an appropriate manner. Further, in view of the immediacy of the current deadline and for the other reasons set

forth above, expedited consideration of this Motion is respectfully requested.

RESPECTFULLY SUBMITTED,



KAREN H. STACHOWSKI (BPR No. 019607)

Assistant Attorney General

Office of the Tennessee Attorney General

Public Protection Section

Consumer Protection and Advocate Division

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was served via U.S. Mail or electronic mail upon:

Jeff Ridsen, Esq.
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This the 12th day of May, 2017



KAREN H. STACHOWSKI

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

IN RE:)
)
PETITION OF TENNESSEE)
WASTEWATER SYSTEMS, INC.,) **DOCKET NO. 16-00139**
FOR APPROVAL OF ADJUSTMENT)
OF ITS RATES AND NEW TARIFF)

**INFORMAL THIRD DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE WASTEWATER SYSTEMS, INC.**

To: Jeff Risdan, Esq.
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This Third Discovery Request is hereby served upon Tennessee Wastewater Systems, Inc. (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests 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, 20th Floor, Nashville, Tennessee 37243, c/o Karen H. Stachowski,

on or before 4:00 p.m. (CDT), April 21, 2017, as ordered by the Hearing Officer in the adoption of a procedural schedule in this TRA Docket.

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 Advocate and Protection Division to Tennessee Wastewater System Inc.* sent to TWSI on January 13, 2017, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by TWSI which would make a prior response inaccurate, incomplete, or incorrect.

THIRD DISCOVERY REQUESTS

3-1. Refer to Exhibits 1 and 2 in the Direct Testimony of Charles Hyatt. Provide revised Exhibits with a Test Period ending December 31, 2016 and Attrition Period ending December 31, 2018.

RESPONSE:

3-2. Refer to the Attachment included by the Company in response to CPAD2-1 for the 2015 and 2016 revenue price-out. Provide this data on a monthly basis from January 2015 through December 2016.

RESPONSE:

3-3. Refer to the Attachment included by the Company in response to CPAD2-1 for the 2015 and 2016 revenue price-out. Indicate the individual billing rates that the Company uses to record

Sewer, Maintenance, Billing & Collecting, Bonding and Escrow Revenues. For example, the Company uses a B&C rate of \$1.5 to calculate the number of customer. What is the source of this charge and the other charge components that the Company uses to record revenues on its books.

RESPONSE:

3-4. Refer to the Attachment included by the Company in response to CPAD2-1 for the 2015 and 2016 revenue price-out. Provide a price-out for the Commercial customer class by month from January 2015 through December 2016 using the individual rate components included in the Company's tariff for Commercial customers with food service and Commercial customers without food service.

RESPONSE:

3-5. Refer to the Attachment included by the Company in response to CPAD2-1 for the 2015 and 2016 revenue price-out. Provide a price-out for the Residential Cabin customer class by month from January 2015 through December 2016 using the individual rate components included in the Company's Commercial tariff for Overnight Rental Units.

RESPONSE:

3-6. Refer to the Company's response to CPAD2-13 regarding developer revenue. The Company's reply to this request appears to be non-responsive in that it did not include the developer contracts that produce the revenue stream for 2010 through 2016. Therefore, provide the developer contracts that produce the revenues associated with Account 421.5.

RESPONSE:

3-7. Refer to the Company's response to CPAD2-13 regarding developer revenue. The Company indicates that "This revenue is not rate based as the expenses are not inclusive either." Identify the expenses that are associated with the revenues in Account 421.5.

RESPONSE:

3-8. Refer to the Company's response to CPAD2-13 regarding developer revenue. Provide all support from the TRA substantiating the Company's claim that developer revenue is not included in utility income.

RESPONSE:

3-9. Refer to Paragraph #9 of the Company's Petition which contains the current and proposed monthly rates. Provide a copy of the Company's current tariff that supports the current monthly rates contained in the Petition.

RESPONSE:

3-10. Refer to the Company's response to CPAD2-120. The Company's reply to this request appears to be non-responsive in that it did not include documentation to support its explanation of the 3% convenience fee. Therefore, please provide documentation such as the current contract or agreement with Bluefin for processing credit cards.

RESPONSE:

3-11. Refer to the Company's response to CPAD2-120 and the Authority's response to the Consumer Advocate's Request for Records dated March 24, 2017. In an email with a subject line of "TWSI Bond True Up", it states that the convenience fee is already being charged. Provide documentation to support your answers to the following:

- a. When did the Company begin assessing the Credit Card Convenience Fee (day/month/year) to its customers?
- b. What was the amount of the initial Credit Card Convenience Fee charged to its customers?
- c. What notice was provided to the Company's customers prior to implementation of this new Credit Card Convenience Fee?
- d. The Company states that the "fee is presented to the customer prior to completing and submitting their payment." Is the only notice provided to the Company's customers of this fee when he/she attempts to pay by credit card online?
- e. What is the total amount collected by year since 2011 when the Company started collecting the Credit Card Convenience Fee?

RESPONSE:

3-12. Regarding the Credit Card Convenience Fee discussed in 3-10 above, answer the following and provide documentation to support your answers:

- a. Did the Company receive multiple bids from vendors for online credit card processing services? If so, how many? If not, what was the process for awarding such contracts?
- b. List all the vendors the Company has contracted over time regarding online credit card processing services and each of the corresponding Credit Card Convenience Fees charged to the Company's customer for each vendor since. Provide copies of any bids and contracts.

- c. If the Company has only had one vendor providing the online credit card processing service, provide the Credit Card Convenience Fees charged to the Company's customers by year since date of implementation.
- d. Who is the point of contact at the current vendor for the Company? Provide the name, address, telephone number, and email address for the contact person
- e. Provide billing statements from the vendor(s) for 2014, 2015 and 2016.

RESPONSE:

3-13. From 2011 (implementation of the Credit Card Convenience Fee) to present, provide a history of the payment options available the Company's customers? For example, customers could also send checks by U.S. mail or pay over the telephone in 2014.

RESPONSE:

3-14. Since 2011 (implementation of the Credit Card Convenience Fee) to present, provide an estimate by year of the number of the Company's customers that utilize the online credit card payment option.

RESPONSE:

3-15. For customers that have limitations on access to the internet, public transportation or credit cards, do you have a payment option that offers a quick and convenient way to pay their bill? List these options.

RESPONSE:

3-16. Since 2011 (implementation of the Credit Card Convenience Fee) provide all customer complaints about the Credit Card Convenience Fees.

RESPONSE:

3-17. Since 2011 (implementation of the Credit Card Convenience Fee), provide all customer complaints about options for payment of bills.

RESPONSE:

3-18. Refer to Company's response to CPAD1-8. The contract provided lists Barrel Investments, LLC as the lessor for property at 1225 Jayell Rd, Sevierville, TN. However, according to the State of Tennessee, Comptroller of the Treasury website, the Property Owner is Robert Pickney (see http://www.assessment.col.tn.gov/RE_Assessment/ParcelDetailIMPACT.aspx). Answer the following and provide documentation to support your answer:

- a. Who owns the property 1225 Jayell Rd, Sevierville, TN?
- b. If Barrel Investments, LLC is not the owner of the property, why is it listed as the lessor of the property?
- c. Erin Elizabeth Pickney is listed as the registered agent of Barrel Investments, LLC. Is Erin Elizabeth Pickney related to any of the board of directors of Adenus Group, LLC— Robert Pickney, Charles Pickney, Thomas Pickney or William Pickney?
- d. Identify the Company's point of contact for Barrel Investments, LLC. Provide the name, address, telephone number, and email address for the contact person.
- e. Barrel Investments, LLC is identified as a member-managed corporation on the Secretary of State's website. Who are the managing members of Barrel Investments, LLC?

- f. Identify other properties considered by the Company prior to contracting to lease this property at 1225 Jayell Rd, Sevierville, TN? Provide the details of those other options, including lease rates.
- g. Identify all employees who have worked at the property by year since the Company started utilizing this property.
- h. Explain the use of the property and the particular structures on the property utilized by the Company.
- i. Has the Company made any improvements to the property? If so, what were the improvements and the associated costs.

RESPONSE:

3-19. Refer to Company's responses to CPAD1-6 through CPAD1-9 regarding written and unwritten contracts with affiliates and non-affiliates respectively. TWSI provided contracts with 3 affiliates: Jeremy Dison, Robert Pickney, and Aviation Parkway Partnership. TWSI provided a contract with one non-affiliate Barrel Investments, LLC. TWSI indicated that there were no unwritten contracts with affiliates or non-affiliates. In the attached Exhibit 3-19A, Robert Pickney identified DRT, LLC as an entity that provides specialized construction to the Company. Answer the following and provide documentation to support your answer:

- a. Why did the company not provide the name of DRT, LLC in response to the Consumer Advocate's First Discovery Request?
- b. There is no listing for DRT, LLC on the Secretary of State's website, but there is a listing for a DRT Services, LLC. Jeremy Dison is the Registered Agent. Is this the

entity that provides specialized construction to the Company as identified by Robert Pickney's attached deposition?


- c. DRT Services, LLC is identified as a member-managed corporation on the Secretary of State's website. Who are the managing members of DRT Services, LLC (or DRT, LLC)?
- d. Provide billing statements from the DRT Services, LLC (or DRT, LLC) for 2014, 2015 and 2016.
- e. Provide copies of the Company's payments to DRT Services, LLC (or DRT, LLC) for 2014, 2015 and 2016.
- f. Identify the Company's point of contact for DRT Services, LLC (or DRT, LLC). Provide the name, address, telephone number, and email address for the contact person.
- g. What was the Company's process for choosing DRT Services, LLC (or DRT, LLC)? If bids were collected or estimates provided, provide copies.
- h. What other vendors did the Company consider before employing DRT Services, LLC (or DRT, LLC)?

RESPONSE:

3-20. Provide copies of any 1099 tax forms the Company filed for 2014, 2015, 2016.

RESPONSE:

RESPECTFULLY SUBMITTED,


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Assistant Attorney General
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Consumer Protection and Advocate Division
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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:

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General Counsel
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hwalker@bradley.com

This the 7 day of April, 2017.


KAREN H. STACHOWSKI

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF TENNESSEE)
WASTEWATER SYSTEMS, INC.,) **DOCKET NO. 16-00139**
FOR APPROVAL OF ADJUSTMENT)
OF ITS RATES AND NEW TARIFF)

**INFORMAL FOURTH DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE WASTEWATER SYSTEMS, INC.**

To: Jeff Risdan, Esq.
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hwalker@bradley.com

This Fourth Discovery Request is hereby served upon Tennessee Wastewater Systems, Inc. (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests 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, 20th Floor, Nashville, Tennessee 37243, c/o Karen H. Stachowski,

on or before 4:00 p.m. (CDT), April 21, 2017, as ordered by the Hearing Officer in the adoption of a procedural schedule in this TPUC Docket.

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 Advocate and Protection Division to Tennessee Wastewater System Inc.* sent to TWSI on January 13, 2017, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by TWSI which would make a prior response inaccurate, incomplete, or incorrect.

FOURTH DISCOVERY REQUESTS

4-1. Refer to the Company's response to CPAD2-15. Please provide a copy of the payroll registers showing the monthly rates of pay for all employees from January 2015 through December 2016.

RESPONSE:

4-2. Refer to the Company's response to CPAD2-23. Please provide a copy of the invoices and any other documentation supporting the Bioxide expense for 2016.

RESPONSE:

4-3. Refer to the Company's response to CPAD2-33. Please identify all amounts used to calculate the \$376 expense for account 736.03 – Contractual Service

RESPONSE:

4-4. Refer to the Company's response to CPAD2-37. Due to some months having multiple timesheets, please identify which specific timesheets were used to calculate the \$223,460 expense for Contractual Service – AUG-MGMT Fees.

RESPONSE:

4-5. Refer to the Company's response to CPAD2-40. Please provide documentation supporting the Company's rent expense of \$60,945 for 2015 and 2016.

RESPONSE:

4-6. Refer to the Company's response to CPAD2-41. Please provide documentation that would support the registration renewal expense of \$1,489 and \$288 for 2015 and 2016.

RESPONSE:

4-7. Refer to the Company's response to CPAD2-51. Please provide the invoices or documentation for the \$3,750.00 withdrawal that occurred on 08/08/2016 and the \$1,900 expense incurred by Danny Crawford that occurred on 08/18/2016.

RESPONSE:

4-8. Refer to the Company's response to CPAD2-54. Please provide a copy of the workpapers supporting the \$111,638 calculation (in Excel format) of Depreciation Expense for 2016.

RESPONSE:

4-9. Refer to the Company's response to CPAD2-84. Please provide a copy of the workpapers supporting the \$37,955 calculation (in Excel format) of Payroll Tax for 2016.

RESPONSE:

4-10. Refer to the Company's response to CPAD2-94. Please provide a copy of the workpapers supporting the \$13,237 calculation (in Excel format) of interest expense for 2016.

RESPONSE:

4-11. Please provide the monthly billing determinants for the Southridge Development from January 2015 through December 2016.

RESPONSE:

4-12. Please provide the monthly number of Nonpayment Charges (5% fee) from January 2015 through December 2016.

RESPONSE:

4-13. Please provide the monthly number of Reconnection Charges (\$50.00 fee) from January 2015 through December 2016.

RESPONSE:

4-14. Please provide the monthly number of Disconnection Charges (\$40.00 fee) from January 2015 through December 2016.

RESPONSE:

4-15. Please provide the monthly number of Returned Check Charges (\$25.00 fee) from January 2015 through December 2016.

RESPONSE:

4-16. Please provide the monthly number of Credit Card Convenience Fee Charges (3% fee) from January 2015 through December 2016.

RESPONSE:

4-17. Please provide the base amount that the City of Coopertown Franchise Fee (3% fee) is applied to from January 2015 through December 2016.

RESPONSE:

4-18. Please provide the monthly number of Pre-Construction Tap Fee Charges (\$3,000.00 fee) from January 2015 through December 2016.

RESPONSE:

4-19. Please provide the monthly number of Post-Construction Tap Fee Charges (\$3,500.00 fee) from January 2015 through December 2016.

RESPONSE:

4-20. Please provide the monthly treatment cost revenue (pass-through amount) for the City of Clarksville from January 2015 through December 2016.

RESPONSE:

RESPECTFULLY SUBMITTED,



KAREN H. STACHOWSKI (BPR No. 019607)

Assistant Attorney General

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Public Protection Section

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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:

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This the 11th day of April, 2017.


KAREN H. STACHOWSKI

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)
)
PETITION OF TENNESSEE)
WASTEWATER SYSTEMS, INC.,) DOCKET NO. 16-00139
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INFORMAL FIFTH DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE WASTEWATER SYSTEMS, INC.

To: Jeff Risdan, Esq.
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This Fifth Discovery Request is hereby served upon Tennessee Wastewater Systems, Inc. (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests 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, 20th Floor, Nashville, Tennessee 37243, c/o Karen H. Stachowski,

on or before 4:00 p.m. (CDT), April 26, 2017, for *Section A. Previously Provided Documents—Request for Excel Format* and on or before 4:00 p.m. (CDT), May 1, 2017, for *Section B. Follow-up to Previous Responses*.

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 Advocate and Protection Division to Tennessee Wastewater System Inc.* sent to the Company on January 13, 2017, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

FIFTH DISCOVERY REQUESTS

A. Previously Provided Documents—Request for Excel Format

5-1. Refer to Attachment “3-2b Southridge” of the Company’s response to CPAD Data Request

3-2. Please provide this response in Excel format.

RESPONSE:

5-2. Refer to the four Attachments of the Company’s response to CPAD Data Request 3-4.

Please provide these Attachments in Excel format.

RESPONSE:

5-3. Refer to the two attachments included in the Company’s response to CPAD Data Request

4-12 regarding nonpayment charges. Please provide these attachments in Excel format.

RESPONSE:

5-4. Refer to the attachment included in the Company's response to CPAD Data Request 4-13 regarding reconnection charges. Please provide this attachment in Excel format.

RESPONSE:

5-5. Refer to the attachment included in the Company's response to CPAD Data Request 4-15 regarding returned check charges. Please provide this attachment in Excel format.

RESPONSE:

5-6. Refer to the two attachments included in the Company's response to CPAD Data Request 4-16 regarding credit card convenience fee charges. Please provide these attachments in Excel format.

RESPONSE:

5-7. Refer to the attachment included in the Company's response to CPAD Data Request 4-20 regarding City of Clarksville treatment charges. Please provide this attachment in Excel format.

RESPONSE:

B. Follow-up to Previous Responses

5-8. Refer to the Company's response to CPAD Data Request 4-4 regarding Contractual Services-AUG-MGMT Fees. We have been unable to reconcile the Company's 2016 management fee expense of \$223,460 from the invoices provided. Please provide an analysis (in Excel format) of the Company's invoices for management fee expense that supports the 2016 expense for \$223,460.

RESPONSE:

5-9. Refer to the Company's response to CPAD Data Request 4-5 regarding rent expense. Please provide documentation supporting the 2016 rent payment of \$60,945 for 2015 and 2016.

RESPONSE

5-10. Refer to the Company's response to CPAD Data Request 4-7 regarding documentation for small equipment purchases for \$1,900 on 8/18/2016 and \$3,750 on 8/8/2016. Please provide a copy of the executed bill of sale showing the signature of both the buyer and seller as well as the signature date.

RESPONSE:

5-11. Refer to the Company's response to CPAD Data Request 3-4. Please provide the source and support for the individual commercial billing rates for that the Company uses to record journal entries for Sewer, Escrow, Maintenance, and Billing & Collecting.

RESPONSE:

5-12. Refer to Attachment 3-2a of the Company's response to CPAD Data Request 3-2. This request asked for a revenue price-out by month from January 2015 through December 2016. The Company's response in Attachment "3-2a" appears to only include a revenue price-out from January 2016 through December 2016. Please provide a revenue price-out from January 2015 to December 2015 to complete this response.

RESPONSE:

5-13. Refer to the Company's response to CPAD Data Request 3-3. This item requested the source and support for the individual residential billing rates for Sewer, Maintenance, Billing & Collecting, Bonding and Escrow Revenues. This information is needed in order to confirm the revenues that the Company's posts to these accounts in its ledger. The response to this request referred to Exhibit 3-2b which is non-responsive. Please provide the source of the individual residential billing rates that the Company uses to record journal entries for Sewer, Maintenance, Billing & Collecting, Bonding and Escrow Revenues.

RESPONSE:

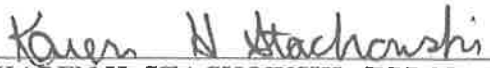
5-14. Refer to the Company's response to CPAD Data Request 4-9 regarding payroll taxes of \$37,955 for 2016. We are unable to reconcile the Company's ledger expense of \$37,955 with the invoices provided in response to CPAD2-84. Please provide an analysis (in Excel format) of the Company's invoices for payroll tax expense that supports the 2016 expense for \$37,955.

RESPONSE:

5-15. Refer to the Company's response to CPAD Data Request 4-10 regarding interest expense of \$13,237 for 2016. We are unable to reconcile the Company's ledger expense of \$13,237 with the invoices provided in response to CPAD2-94. Please provide an analysis (in Excel format) of the Company's invoices for interest expense that supports the 2016 expense for \$13,237.

RESPONSE:

RESPECTFULLY SUBMITTED,


KAREN H. STACHOWSKI (BPR No. 019607)
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Office of the Tennessee Attorney General
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Consumer Protection and Advocate Division
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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:

Jeff Risen, Esq.
General Counsel
Tennessee Wastewater Systems, Inc.
851 Aviation Parkway
Smyrna, TN 37167
615-220-7171
615-346-9516 (fax)
Jeff.risen@adenus.com

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1600 Division St., Suite 700
Nashville, TN 37203
615-252-2363
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hwalker@bradley.com

This the 24th day of April, 2017.



KAREN H. STACHOWSKI

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF TENNESSEE)
WASTEWATER SYSTEMS, INC.,) **DOCKET NO. 16-00139**
FOR APPROVAL OF ADJUSTMENT)
OF ITS RATES AND NEW TARIFF)

**INFORMAL SIXTH DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE WASTEWATER SYSTEMS, INC.**

To: Jeff Ridsen, Esq.
General Counsel
Tennessee Wastewater Systems, Inc.
851 Aviation Parkway
Smyrna, TN 37167
615-220-7171
615-346-9516 (fax)
Jeff.ridsen@adenus.com

Henry M. Walker, Esq.
Bradley, LLP
1600 Division St., Suite 700
Nashville, TN 37203
615-252-2363
615-252-6363 (fax)
hwalker@bradley.com

This Sixth Discovery Request is hereby served upon Tennessee Wastewater Systems, Inc. (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests 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, 20th Floor, Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 4:00 p.m. (CDT), May 5, 2017.

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 Advocate and Protection Division to Tennessee Wastewater System Inc.* sent to the Company on January 13, 2017, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SIXTH DISCOVERY REQUESTS

6-1. Refer to Attachment “MTN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 606 (TNCOM0012) for January 2015

Sewer Revenue	\$886.62
Escrow Revenue	368.88
Maintenance Revenue	488.83
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$1,747.31

RESPONSE:

6-2. Refer to Attachment “MTN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown

below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 619 (TNCOM0014) for January 2015

Sewer Revenue	\$130.39
Escrow Revenue	56.10
Maintenance Revenue	73.11
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 262.58

RESPONSE:

6-3. Refer to Attachment "MTN Commercial without Food 1-1-2016 through 12-31-16" of the Company's response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 1167 (TNCOM0021) for January 2015

Sewer Revenue	\$97.20
Escrow Revenue	41.11
Maintenance Revenue	54.37
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 195.66

RESPONSE:

6-4. Refer to Attachment "MTN Commercial without Food 1-1-2016 through 12-31-16" of the Company's response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 1202 (TNCOM0024) for January 2015

Sewer Revenue	\$70.05
---------------	---------

Escrow Revenue	30.18
Maintenance Revenue	39.56
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 142.77

RESPONSE:

6-5. Refer to Attachment “MTN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 1331 (TNSSP001A) for January 2015

Sewer Revenue	\$130.39
Escrow Revenue	56.10
Maintenance Revenue	73.11
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 262.58

RESPONSE:

6-6. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 551 (TNCOM0002) for January 2015

Sewer Revenue	\$938.72
Escrow Revenue	394.98
Maintenance Revenue	519.25
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$1,855.93

RESPONSE:

6-7. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 2169 (TNCOM0003) for January 2015

Sewer Revenue	\$50.30
Escrow Revenue	21.75
Maintenance Revenue	28.60
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 103.63

RESPONSE:

6-8. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 557 (TNCOM0008) for January 2015

Sewer Revenue	\$291.72
Escrow Revenue	123.19
Maintenance Revenue	161.94
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 579.83

RESPONSE:

6-9. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown

below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 560 (TNCOM0011) for January 2015

Sewer Revenue	\$586.04
Escrow Revenue	246.50
Maintenance Revenue	324.35
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$1,159.87

RESPONSE:

6-10. Refer to Attachment "MTN Commercial with Food 1-1-2016 through 12-31-16" of the Company's response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 551 (TNCOM0017) for January 2015

Sewer Revenue	\$938.72
Escrow Revenue	394.98
Maintenance Revenue	519.25
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$1,855.93

RESPONSE:

6-11. Refer to Attachment "MTN Commercial with Food 1-1-2016 through 12-31-16" of the Company's response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 551 (TNCOM0025) for January 2015

Sewer Revenue	\$938.72
Escrow Revenue	394.98
Maintenance Revenue	519.25

Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$1,855.93

RESPONSE:

6-12. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 557 (TNCOM0030) for January 2015

Sewer Revenue	\$233.05
Escrow Revenue	98.41
Maintenance Revenue	129.37
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 463.81

RESPONSE:

6-13. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 2642 (TNCOM0035) for January 2015

Sewer Revenue	\$4,534.87
Escrow Revenue	1,928.90
Maintenance Revenue	2,517.38
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$8,983.79

RESPONSE:

6-14. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for October 2016 with the Company’s tariffs for the following account:

Account 2980 (TNCOM0038) for October 2016

Sewer Revenue	\$643.80
Escrow Revenue	466.86
Maintenance Revenue	855.10
Billing Revenue	3.00
Bonding Revenue	2.42
Total Revenue	\$1,971.18

RESPONSE:

6-15. Refer to Attachment “MTN Commercial with Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for June 2016 with the Company’s tariffs for the following account:

Account 1706 (TNGRVCLUB) for June 2016

Sewer Revenue	\$1,836.87
Escrow Revenue	1,331.97
Maintenance Revenue	2,439.06
Billing Revenue	4.50
Bonding Revenue	3.42
Total Revenue	\$5,615.82

RESPONSE:

6-16. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 564 (TNBCO0002) for January 2015

Sewer Revenue	\$52.51
Escrow Revenue	34.53
Maintenance Revenue	73.59
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 163.61

RESPONSE:

6-17. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 782 (TNTCO0001) for January 2015

Sewer Revenue	\$116.81
Escrow Revenue	75.18
Maintenance Revenue	159.43
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 354.40

RESPONSE:

6-18. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 1637 (TNTCO002A) for January 2015

Sewer Revenue	\$114.48
Escrow Revenue	74.22
Maintenance Revenue	154.81
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 346.49

RESPONSE:

6-19. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 1637 (TNCO002B) for January 2015

Sewer Revenue	\$73.39
Escrow Revenue	47.65
Maintenance Revenue	99.46
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 223.48

RESPONSE:

6-20. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company’s tariffs for the following account:

Account 798 (TNTTR0001) for January 2015

Sewer Revenue	\$219.22
Escrow Revenue	141.97
Maintenance Revenue	295.95
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 660.12

RESPONSE:

6-21. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown

below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 2009 (TNTTS7967) for January 2015

Sewer Revenue	\$43.75
Escrow Revenue	29.00
Maintenance Revenue	61.90
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 137.63

RESPONSE:

6-22. Refer to Attachment "ETN Commercial with Food 1-1-2016 through 12-31-16" of the Company's response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 828 (TNTTS0002) for January 2015

Sewer Revenue	\$231.87
Escrow Revenue	147.92
Maintenance Revenue	313.09
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 695.86

RESPONSE:

6-23. Refer to Attachment "ETN Commercial with Food 1-1-2016 through 12-31-16" of the Company's response to CPAD Data Request 5-2. Please reconcile the billing revenue as shown below from this Attachment for January 2015 with the Company's tariffs for the following account:

Account 830 (TNTTS7955) for January 2015

Sewer Revenue	\$166.72
---------------	----------

Escrow Revenue	106.73
Maintenance Revenue	226.08
Billing Revenue	1.50
Bonding Revenue	1.48
Total Revenue	\$ 502.51

RESPONSE:

6-24. Refer to the four Attachments included with the Company’s response to CPAD Data Request 5-2 which contain the monthly commercial billing detail for January 2015 through December 2016. Please provide the source and support documents that the Company relies upon to determine the current expected design flow for all commercial customers.

RESPONSE:

6-25. Refer to the four Attachments included with the Company’s response to CPAD Data Request 5-2 which contain the monthly commercial billing detail for January 2015 through December 2016. Almost all of these commercial customers are billed using the same expected design flow for each month of this two year period. Provide a copy of the Company’s policy for reassessing expected design flow for commercial customers, and how often this reassessment takes place.

RESPONSE:

6-26. Refer to Attachment “ETN Commercial without Food 1-1-2016 through 12-31-16” of the Company’s response to CPAD Data Request 5-2. Specifically refer to the following accounts in this spreadsheet.

- Account 564 (Location TNBCO0002)
- Account 1637 (Location TNTCO002A)
- Account 1637 (Location TNTCO002B)

Account 798 (Location TNTTR0001)

The bills for each of these accounts varies for each month of this two year period. Explain how the Company determines and implements the expected design flow on a monthly basis to determine the billing amount for each of these customers.

RESPECTFULLY SUBMITTED,



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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:

Jeff Riden, Esq.
General Counsel
Tennessee Wastewater Systems, Inc.
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615-252-2363
615-252-6363 (fax)
hwalker@bradley.com

This the 28 day of April, 2017.



KAREN H. STACHOWSKI

Refer to Attachment "Cabin 2015 2016" of the Company's response to CPAD Data Request 5-2 Supplemental. Please reconcile the billing revenue as shown below from this Attachment for the stated month with the Company's tariffs for the following accounts:

Account 1709 (TNBBR0090) for December 2016

Sewer Revenue	\$45.47
Escrow Revenue	37.20
Maintenance Revenue	75.12
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$160.50

Account 802 (TNBBR0094) for October 2016

Sewer Revenue	\$58.26
Escrow Revenue	47.45
Maintenance Revenue	95.54
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$203.96

Account 356 (TNBBR011R) for December 2016

Sewer Revenue	\$27.51
Escrow Revenue	22.81
Maintenance Revenue	46.43
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$99.46

Follow-up on Commercial Cabins from
Discovery Request 5-2 Supplemental
May 8, 2017

Exhibit E



Account 408 (TNBBR0129) for December 2016

Sewer Revenue	\$22.83
Escrow Revenue	19.06
Maintenance Revenue	38.95
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$83.55

Account 173 (TNBBR012R) for December 2016

Sewer Revenue	\$128.52
Escrow Revenue	103.75
Maintenance Revenue	207.78
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$442.76

Account 1757 (TNBBR0130) for July 2016

Sewer Revenue	\$34.88
Escrow Revenue	28.72
Maintenance Revenue	58.20
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$124.44

Account 2259 (TNBBR013R) for December 2016

Sewer Revenue	\$32.98
Escrow Revenue	27.20
Maintenance Revenue	55.17
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$118.06

Account 264 (TNBBR0146) for July 2016

Sewer Revenue	\$31.84
Escrow Revenue	26.28
Maintenance Revenue	53.34
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$114.10

Account 2249 (TNBBR0147) for November 2016

Sewer Revenue	\$25.08
Escrow Revenue	20.87
Maintenance Revenue	42.55
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$91.21

Account 663 (TNBBR0148) for December 2016

Follow-up on Commercial Cabins from
Discovery Request 5-2 Supplemental
May 8, 2017

Sewer Revenue	\$24.91
Escrow Revenue	20.72
Maintenance Revenue	42.27
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$90.61

Account 2298 (TNBBR0152) for December 2016

Sewer Revenue	\$25.08
Escrow Revenue	20.87
Maintenance Revenue	42.55
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$91.21

Account 2058 (TNBBR0181) for November 2016

Sewer Revenue	\$25.97
Escrow Revenue	21.57
Maintenance Revenue	43.96
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$94.21

Account 1963 (TNBBR091R) for December 2016

Sewer Revenue	\$34.71
Escrow Revenue	28.58
Maintenance Revenue	57.92
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$123.92

Account 1866 (TNBBR093R) for November 2016

Sewer Revenue	\$36.07
Escrow Revenue	29.67
Maintenance Revenue	60.10
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$128.55

Account 264 (TNBBR141R) for August 2016

Sewer Revenue	\$32.41
Escrow Revenue	26.74
Maintenance Revenue	54.25
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$116.04

Account 264 (TNBBR144R) for August 2016

Sewer Revenue	\$32.41
Escrow Revenue	26.74
Maintenance Revenue	54.25
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$116.04

Account 2015 (TNBBR151R) for July 2016

Sewer Revenue	\$30.73
Escrow Revenue	25.39
Maintenance Revenue	51.57
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$110.33

Account 1346 (TNBBR153R) for December 2016

Sewer Revenue	\$34.35
Escrow Revenue	28.29
Maintenance Revenue	57.35
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$122.70

Account 620 (TNBBR192R) for September 2016

Sewer Revenue	\$31.00
Escrow Revenue	25.60
Maintenance Revenue	52.00
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$111.31

Account 2004 (TNBBR197R) for October 2016

Sewer Revenue	\$22.79
Escrow Revenue	19.03
Maintenance Revenue	38.88
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$83.41

Account 190 (TNESP0051) for October 2016

Sewer Revenue	\$192.03
Escrow Revenue	161.63
Maintenance Revenue	331.87
Billing Revenue	16.50
Bonding Revenue	13.31
Total Revenue	\$715.34

Account 1538 (TNESP0103) for December 2016

Sewer Revenue	\$76.84
Escrow Revenue	62.34
Maintenance Revenue	125.23
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$267.12

Account 1697 (TNHSP0052) for September 2016

Sewer Revenue	\$24.20
Escrow Revenue	20.16
Maintenance Revenue	41.14
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$88.21

Account 1565 (TNHSP0079) for August 2016

Sewer Revenue	\$22.04
Escrow Revenue	18.43
Maintenance Revenue	37.69
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$80.80

Account 159 (TNHSP0084) for September 2016

Sewer Revenue	\$46.58
Escrow Revenue	38.09
Maintenance Revenue	76.88
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$164.26

Account 1723 (TNHSP0261) for September 2016

Sewer Revenue	\$1.50
Escrow Revenue	1.14
Maintenance Revenue	10.13
Billing Revenue	21.40
Bonding Revenue	11.12
Total Revenue	\$45.29

Account 2036 (TNHSP0628) for December 2016

Sewer Revenue	\$22.08
Escrow Revenue	18.46
Maintenance Revenue	37.76
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$81.01

Account 238 (TNHSP136R) for September 2016

Sewer Revenue	\$36.38
Escrow Revenue	29.92
Maintenance Revenue	60.60
Billing Revenue	1.50
Bonding Revenue	1.12
Total Revenue	\$129.61

Account 350 (TNLPR0074) for August 2016

Sewer Revenue	\$24.16
Escrow Revenue	20.12
Maintenance Revenue	41.07
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$87.99

Account 251 (TNLPR063R) for August 2016

Sewer Revenue	\$39.38
Escrow Revenue	32.32
Maintenance Revenue	65.39
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$139.73

Account 1689 (TNSLR0030) for December 2016

Sewer Revenue	\$1.50
Escrow Revenue	1.21
Maintenance Revenue	18.95
Billing Revenue	15.95
Bonding Revenue	32.75
Total Revenue	\$70.36

Account 129 (TNSMC0001) for August 2016

Sewer Revenue	\$28.62
Escrow Revenue	23.70
Maintenance Revenue	48.19
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$103.15

Account 2157 (TNMC0002) for December 2016

Sewer Revenue	\$33.37
Escrow Revenue	21.75
Maintenance Revenue	45.53
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$103.36

Account 198 (TNSMC0005) for October 2016

Sewer Revenue	\$35.94
Escrow Revenue	29.57
Maintenance Revenue	59.89
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$128.11

Account 1981 (TNSMC0007) for August 2016

Sewer Revenue	\$28.44
Escrow Revenue	23.55
Maintenance Revenue	47.91
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$102.54

Account 1571 (TNSMC0040) for December 2016

Sewer Revenue	\$37.90
Escrow Revenue	31.90
Maintenance Revenue	65.50
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$140.72

Account 2173 (TNSMC0096) for December 2016

Sewer Revenue	\$1.50
Escrow Revenue	1.21
Maintenance Revenue	10.13
Billing Revenue	21.40
Bonding Revenue	11.12
Total Revenue	\$45.36

Account 229 (TNSTC1004) for August 2016

Sewer Revenue	\$21.86
Escrow Revenue	18.28
Maintenance Revenue	37.40
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$80.18

Account 1981 (TNSTC1006) for December 2016

Sewer Revenue	\$99.15
Escrow Revenue	80.22
Maintenance Revenue	160.86
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$342.94

Account 678 (TNSTC1034) for August 2016

Sewer Revenue	\$65.32
Escrow Revenue	53.11
Maintenance Revenue	106.82
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$227.89

Account 720 (TNSTC1037) for September 2016

Sewer Revenue	\$31.31
Escrow Revenue	25.85
Maintenance Revenue	52.49
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$112.36

Account 1646 (TNSTC1060) for August 2016

Sewer Revenue	\$56.02
Escrow Revenue	45.66
Maintenance Revenue	91.97
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$196.29

Account 1548 (TNSTC2137) for December 2016

Sewer Revenue	\$27.29
Escrow Revenue	22.63
Maintenance Revenue	46.07
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$98.70

Account 2288 (TNSTC3008) for November 2016

Sewer Revenue	\$20.54
Escrow Revenue	17.22
Maintenance Revenue	35.29
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$75.76

Account 249 (TNSTC3023) for August 2016

Sewer Revenue	\$22.13
Escrow Revenue	18.50
Maintenance Revenue	37.83
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$81.10

Account 302 (TNSTC3030) for August 2016

Sewer Revenue	\$28.22
Escrow Revenue	23.38
Maintenance Revenue	47.56
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$101.80

Account 148 (TNTHI0002) for November 2016

Sewer Revenue	\$21.16
Escrow Revenue	17.72
Maintenance Revenue	36.28
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$77.87

Refer to Attachment "Cabin 2015 2016" of the Company's response to CPAD Data Request 5-2 Supplemental. Please reconcile the billing revenue as shown below from this Attachment for the stated month with the Company's tariffs for the following accounts:

Account 1709 (TNBBR0090) for December 2016

Sewer Revenue	\$45.47
Escrow Revenue	37.20
Maintenance Revenue	75.12
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$160.50

Account 802 (TNBBR0094) for October 2016

Sewer Revenue	\$58.26
Escrow Revenue	47.45
Maintenance Revenue	95.54
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$203.96

Account 356 (TNBBR011R) for December 2016

Sewer Revenue	\$27.51
Escrow Revenue	22.81
Maintenance Revenue	46.43
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$99.46

Account 408 (TNBBR0129) for December 2016

Sewer Revenue	\$22.83
Escrow Revenue	19.06
Maintenance Revenue	38.95
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$83.55

Account 173 (TNBBR012R) for December 2016

Sewer Revenue	\$128.52
Escrow Revenue	103.75
Maintenance Revenue	207.78
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$442.76

Account 1757 (TNBBR0130) for July 2016

Sewer Revenue	\$34.88
Escrow Revenue	28.72
Maintenance Revenue	58.20
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$124.44

Account 2259 (TNBBR013R) for December 2016

Sewer Revenue	\$32.98
Escrow Revenue	27.20
Maintenance Revenue	55.17
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$118.06

Account 264 (TNBBR0146) for July 2016

Sewer Revenue	\$31.84
Escrow Revenue	26.28
Maintenance Revenue	53.34
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$114.10

Account 2249 (TNBBR0147) for November 2016

Sewer Revenue	\$25.08
Escrow Revenue	20.87
Maintenance Revenue	42.55
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$91.21

Account 663 (TNBBR0148) for December 2016

Follow-up on Commercial Cabins from
Discovery Request 5-2 Supplemental
May 8, 2017

Sewer Revenue	\$24.91
Escrow Revenue	20.72
Maintenance Revenue	42.27
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$90.61

Account 2298 (TNBBR0152) for December 2016

Sewer Revenue	\$25.08
Escrow Revenue	20.87
Maintenance Revenue	42.55
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$91.21

Account 2058 (TNBBR0181) for November 2016

Sewer Revenue	\$25.97
Escrow Revenue	21.57
Maintenance Revenue	43.96
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$94.21

Account 1963 (TNBBR091R) for December 2016

Sewer Revenue	\$34.71
Escrow Revenue	28.58
Maintenance Revenue	57.92
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$123.92

Account 1866 (TNBBR093R) for November 2016

Sewer Revenue	\$36.07
Escrow Revenue	29.67
Maintenance Revenue	60.10
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$128.55

Account 264 (TNBBR141R) for August 2016

Sewer Revenue	\$32.41
Escrow Revenue	26.74
Maintenance Revenue	54.25
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$116.04

Account 264 (TNBBR144R) for August 2016

Sewer Revenue	\$32.41
Escrow Revenue	26.74
Maintenance Revenue	54.25
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$116.04

Account 2015 (TNBBR151R) for July 2016

Sewer Revenue	\$30.73
Escrow Revenue	25.39
Maintenance Revenue	51.57
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$110.33

Account 1346 (TNBBR153R) for December 2016

Sewer Revenue	\$34.35
Escrow Revenue	28.29
Maintenance Revenue	57.35
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$122.70

Account 620 (TNBBR192R) for September 2016

Sewer Revenue	\$31.00
Escrow Revenue	25.60
Maintenance Revenue	52.00
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$111.31

Account 2004 (TNBBR197R) for October 2016

Sewer Revenue	\$22.79
Escrow Revenue	19.03
Maintenance Revenue	38.88
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$83.41

Account 190 (TNESP0051) for October 2016

Sewer Revenue	\$192.03
Escrow Revenue	161.63
Maintenance Revenue	331.87
Billing Revenue	16.50
Bonding Revenue	13.31
Total Revenue	\$715.34

Account 1538 (TNESP0103) for December 2016

Sewer Revenue	\$76.84
Escrow Revenue	62.34
Maintenance Revenue	125.23
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$267.12

Account 1697 (TNHSP0052) for September 2016

Sewer Revenue	\$24.20
Escrow Revenue	20.16
Maintenance Revenue	41.14
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$88.21

Account 1565 (TNHSP0079) for August 2016

Sewer Revenue	\$22.04
Escrow Revenue	18.43
Maintenance Revenue	37.69
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$80.80

Account 159 (TNHSP0084) for September 2016

Sewer Revenue	\$46.58
Escrow Revenue	38.09
Maintenance Revenue	76.88
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$164.26

Account 1723 (TNHSP0261) for September 2016

Sewer Revenue	\$1.50
Escrow Revenue	1.14
Maintenance Revenue	10.13
Billing Revenue	21.40
Bonding Revenue	11.12
Total Revenue	\$45.29

Account 2036 (TNHSP0628) for December 2016

Sewer Revenue	\$22.08
Escrow Revenue	18.46
Maintenance Revenue	37.76
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$81.01

Account 238 (TNHSP136R) for September 2016

Sewer Revenue	\$36.38
Escrow Revenue	29.92
Maintenance Revenue	60.60
Billing Revenue	1.50
Bonding Revenue	1.12
Total Revenue	\$129.61

Account 350 (TNLPR0074) for August 2016

Sewer Revenue	\$24.16
Escrow Revenue	20.12
Maintenance Revenue	41.07
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$87.99

Account 251 (TNLPR063R) for August 2016

Sewer Revenue	\$39.38
Escrow Revenue	32.32
Maintenance Revenue	65.39
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$139.73

Account 1689 (TNSLR0030) for December 2016

Sewer Revenue	\$1.50
Escrow Revenue	1.21
Maintenance Revenue	18.95
Billing Revenue	15.95
Bonding Revenue	32.75
Total Revenue	\$70.36

Account 129 (TNSMC0001) for August 2016

Sewer Revenue	\$28.62
Escrow Revenue	23.70
Maintenance Revenue	48.19
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$103.15

Account 2157 (TNMC0002) for December 2016

Sewer Revenue	\$33.37
Escrow Revenue	21.75
Maintenance Revenue	45.53
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$103.36

Account 198 (TNSMC0005) for October 2016

Sewer Revenue	\$35.94
Escrow Revenue	29.57
Maintenance Revenue	59.89
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$128.11

Account 1981 (TNSMC0007) for August 2016

Sewer Revenue	\$28.44
Escrow Revenue	23.55
Maintenance Revenue	47.91
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$102.54

Account 1571 (TNSMC0040) for December 2016

Sewer Revenue	\$37.90
Escrow Revenue	31.90
Maintenance Revenue	65.50
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$140.72

Account 2173 (TNSMC0096) for December 2016

Sewer Revenue	\$1.50
Escrow Revenue	1.21
Maintenance Revenue	10.13
Billing Revenue	21.40
Bonding Revenue	11.12
Total Revenue	\$45.36

Account 229 (TNSTC1004) for August 2016

Sewer Revenue	\$21.86
Escrow Revenue	18.28
Maintenance Revenue	37.40
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$80.18

Account 1981 (TNSTC1006) for December 2016

Sewer Revenue	\$99.15
Escrow Revenue	80.22
Maintenance Revenue	160.86
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$342.94

Account 678 (TNSTC1034) for August 2016

Sewer Revenue	\$65.32
Escrow Revenue	53.11
Maintenance Revenue	106.82
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$227.89

Account 720 (TNSTC1037) for September 2016

Sewer Revenue	\$31.31
Escrow Revenue	25.85
Maintenance Revenue	52.49
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$112.36

Account 1646 (TNSTC1060) for August 2016

Sewer Revenue	\$56.02
Escrow Revenue	45.66
Maintenance Revenue	91.97
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$196.29

Account 1548 (TNSTC2137) for December 2016

Sewer Revenue	\$27.29
Escrow Revenue	22.63
Maintenance Revenue	46.07
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$98.70

Account 2288 (TNSTC3008) for November 2016

Sewer Revenue	\$20.54
Escrow Revenue	17.22
Maintenance Revenue	35.29
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$75.76

Account 249 (TNSTC3023) for August 2016

Sewer Revenue	\$22.13
Escrow Revenue	18.50
Maintenance Revenue	37.83
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$81.10

Account 302 (TNSTC3030) for August 2016

Sewer Revenue	\$28.22
Escrow Revenue	23.38
Maintenance Revenue	47.56
Billing Revenue	1.50
Bonding Revenue	1.14
Total Revenue	\$101.80

Account 148 (TNTHI0002) for November 2016

Sewer Revenue	\$21.16
Escrow Revenue	17.72
Maintenance Revenue	36.28
Billing Revenue	1.50
Bonding Revenue	1.21
Total Revenue	\$77.87