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Filed Electronically in TPUC Docket Room on 10/11/2017

October 11, 2017

Via Electronic Mail and Federal Express

(tpuc.docketroom@tn.gov)

Tory Lawless, Acting Docket Manager

Tennessee Public Utility Commission

502 Deaderick Street, 4th Floor

Nashville, Tennessee 37243

Re: *In Re: Petition of the Laurel Hills Water System Receivership for Provisional Certificate of Public Convenience and Necessity*
Tennessee Public Utility Commission, Docket No. 17-00098

Dear Ms. Lawless:

Attached is a Petition to Intervene to be filed in the above-styled matter on behalf of Renegade Mountain Community Club. The original and four copies will follow by Federal Express. Copies of the Petition have been served by first class mail on the parties listed in the Certificate of Service.

Thank you for your assistance in this matter.

Sincerely,

Daniel J. Moore

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DJM:ar
Enclosure

cc: Mr. Michael McClung
Robert Schwerer, Esq.
Aaron Conklin, Esq.
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**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF THE LAUREL HILLS)	
WATER SYSTEM IN RECEIVERSHIP)	Docket No. 17-00098
FOR PROVISIONAL CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

PETITION TO INTERVENE

Comes now Renegade Mountain Community Club (the "Community Club"), by and through counsel, and respectfully petitions the Tennessee Public Utility Commission ("TPUC") to grant the Community Club's intervention into this proceeding because interests, rights, duties, or privileges of the Community Club and the members of the Community Club may be determined or affected by Receivership Management, Inc.'s (RMI) Petition of Laurel Hills Water System in Receivership for Provisional Certificate of Public Convenience and Necessity (Petition). For cause, the Community Club would show as follows:

1. The Community Club is a Tennessee nonprofit corporation. It is the homeowners association for Renegade Mountain. As such, the residents of Renegade Mountain are members of the Community Club.
2. The Community Club is charged with the maintenance of common areas of the Renegade Mountain subdivision, including, but not limited to, easements upon the roads, for the benefit of the members of the Community Club.
3. The residents of Renegade Mountain, who are members of the Community Club, receive their water from the Laurel Hills Water System.

4. Portions of the Laurel Hills Water System lie within the boundaries of the common areas of Renegade Mountain, including the easements over the roads that benefit the Community Club and the members of the Community Club.

5. RMI is a Tennessee-based corporation appointed by the Cumberland County Chancery Court to serve as the Receiver of the Laurel Hills Water System.

6. On September 12, 2017, RMI filed its Petition seeking a Provisional Certificate of Public Convenience and Necessity (CCN).

7. In its Petition, RMI references the ongoing litigation in Cumberland County Chancery Court, Docket No. 2012-CH-560, related to the purported settlement agreement between the Laurel Hills Condominium POA and TPUC, entered in TPUC Docket No. 12-00077.

8. RMI has already received approval to set rates for water services and now seeks a CCN from TPUC to operate the Laurel Hills Water System.

9. The interests of the Community Club and the members of the Community Club may be affected by the determinations and orders made by the TPUC with respect to (A) the interpretation, application, and implementation of Tenn. Code Ann. §65-4-201 et seq., and other relevant statutory and regulatory provisions and (B) the review and analysis of information RMI submits in support of its request for a CCN.

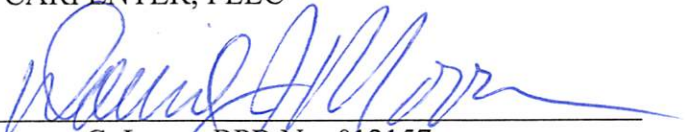
10. The Community Club is an interested party and is entitled to notice and the opportunity to be heard in this proceeding pursuant to Tenn. Code Ann. §65-4-204.

11. Only by participating as a party in this proceeding can the Community Club represent the interests of itself and the members of the Community Club.

WHEREFORE, the Community Club respectfully requests that TPUC grant this Petition to Intervene, and provide the Community Club with notice of and the opportunity to be heard in any hearing conducted in this proceeding.

RESPECTFULLY SUBMITTED:

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Attorneys for Renegade Mountain Community Club

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing pleading has been served upon the following counsel for the parties in interest herein by delivering same to the offices of said counsel, or by mailing same to the offices of said counsel by United States Mail with sufficient postage thereon to carry the same to its destination.

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This the 11 day October, 2017.



Daniel J. Moore, Esq.