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November 29, 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 Renegade Mountain Community Club's Responses to Interrogatories and Second Request for Production of Documents from Receivership Management, Inc. to be filed in the above-styled matter. The original and four copies will follow by Federal Express. Copies of the Responses 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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Daniel P. Whitaker, III, Esq.

**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)	

**RENEGADE MOUNTAIN COMMUNITY CLUB'S
RESPONSES TO INTERROGATORIES AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
FROM RECEIVERSHIP MANAGEMENT, INC.**

Comes now Renegade Mountain Community Club (hereinafter sometimes the "Community Club" or "RMCC"), by and through counsel, and respectfully submits these Responses to Interrogatories and First Request for Production of Documents from Receivership Management, Inc. ("Petitioner").

RESPONSES TO INTERROGATORIES

Interrogatory No. 1: Please identify and provide complete contact information (to include at minimum telephone number, address and email address) for each person who is an expert witness and who RMCC expects to call at the hearing of this matter. With regard to each expert witness, please describe: (a) the subject matter about which the expert is expected to testify; (b) the substance of the facts and opinions as to which expert is expected to testify; (c) give a summary for the grounds of each such opinion; (d) please attach to your answers to these interrogatories a copy of each expert's curriculum vitae; and (e) please state the dates of any reports prepared by such experts and attach to your answers to these interrogatories a copy of any report prepared by each such expert who RMCC expects to call at the trial of this matter.

RESPONSE: No expert has been identified as of the date hereof. RMCC reserves the right to supplement this response at a later date.

Interrogatory No. 2: Please identify and provide complete contact information (to include at minimum telephone number, address and email address) for each person associated with RMCC with personal knowledge of the facts related to the Laurel Hills Water System in Receivership, and please state, in detail, the facts of which you are aware that each identified person possesses.

RESPONSE: Objection. This interrogatory seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence, requests RMCC to perform research and tasks that are onerous, is overbroad, vague, and not related to any issue or fact in dispute, if any, concerning or relating to RMCC's ability to intervene and participate in this TPUC proceeding.. Subject to objections, Michael M. McClung, director and Chairman, 35 West Harbour Isles Dr #215, Fort Pierce, FL 34949, mcclungmichael65@gmail.com; Phillip Guettler, director and President, 4401 Whiteway Dairy Road, Fort Pierce, FL 34947 guett@bellsouth.net; Cumberland Point President Dave Carter, PO Box 3667, Crossville TN 38557, daveacarter@outlook.com. RMCC reserves the right to supplement this response at a later date.

Interrogatory No. 3: Please identify and provide complete contact information (to include at minimum telephone number, address and email address) for all persons who will provide evidence, in person, by affidavit, or otherwise, at the hearing on this matter

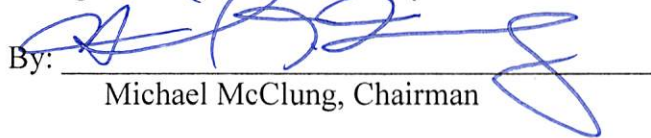
RESPONSE: Objection. See response 2 above. Subject to objections, the persons mentioned in response 2 above.

REQUESTS FOR PRODUCTION OF DOCUMENTS


Request for Production No. 1: Produce all Documents that will be introduced into evidence by the RMCC at the hearing on the Petition. Objection. This interrogatory seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence, requests RMCC to perform research and tasks that are onerous, is overbroad, vague, and not related to any issue or fact in dispute, if any, concerning or relating to RMCC's ability to intervene and participate in this TPUC proceeding.

Respectfully submitted this 29th day of November, 2017.

Renegade Mountain Community Club

By: 
Michael McClung, Chairman

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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 29th day November, 2017.


Daniel J. Moore, Esq.