## BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

IN RE:	)	
	)	
PETITION OF SUPERIOR WATER SERVIC	E )	
FOR A CERTIFICATE OF CONVENIENCE	)	
AND NECESSITY TO PROVIDE WATER	)	
SERVICE TO A PORTION OF KINGS'	)	Docket No. 17-00120
CHAPEL SUBDIVISION IN WILLIAMSON	)	
COUNTY	)	
	)	

SUPERIOR WATER SERVICE'S SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS IN ORDER TO REQUEST DISCOVERY AND SUBPOENA DUCES TECUM FOR INFORMATION HELD BY MILCROFTON UTILITY DISTRICT AND NOLENSVILLE/COLLEGE GROVE UTILITY DISTRICT

On June 12, 2018, Superior Water Service, LLC ("Superior Water") filed its initial Response in this Docket to the Motion to Dismiss filed by Milcrofton Utility District and Nolensville/College Grove Utility District (collectively, "the Utility Districts"). In order to further its full response to the Motion to Dismiss, Superior Water now asks the Hearing Officer for approval to issue discovery requests (in the form of oral depositions) to the Utility Districts.

Superior Water states that if the pending motion to dismiss is granted, then Superior Water and the Developer of the King's Chapel Subdivision ("the Developer") will have no other practical means of obtaining water service. It is the position of Superior Water, that critical information relevant to the Utility District's Motion to Dismiss can only be obtained through oral depositions of select Directors, Officers, engineers and Managers of the Utility Districts.

RESPECTFULLY SUBMITTED,

## 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:

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This the 18th day of June, 2018.

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