

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

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<b>Re:</b>	)	
	)	
	)	
<b>COMPLAINTS AND PETITIONS</b>	)	
<b>OF RONALD C. McCABE vs.</b>	)	<b>DOCKET NO. 22-00105</b>
<b>TENNESSEE WASTEWATER</b>	)	
<b>SYSTEMS, INC.</b>	)	

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**TENNESSEE WASTEWATER'S OPPOSITION  
TO PETITIONER'S MOTION TO COMPEL**

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Tennessee Wastewater Systems, Inc. ("TWSI") by and through counsel files this Objection to Petitioner's Motion to Compel.

The Petitioner's motion does not raise any true issues regarding unresponsive responses to his discovery requests<sup>1</sup>. The responses provided by TWSI to Petitioner's discovery requests accurately and completely answer the requests as submitted by the Petitioner. The Petitioner is using this motion to either (1) express his displeasure about the responses he received; (2) request additional information not sought in the original request; (3) mischaracterizes the responses; or (4) argue about how the responses do not comport to his opinions and interpretations of the matters for which he is seeking information. This is not the purpose of a Motion to Compel and are not adequate grounds for granting such a motion.

To the extent Petitioner requests specific confirmations or denials to certain Discovery Requests, TWSI responds as follows:

DR #1 – Confirm

DR #3 - Confirm

DR #10 - Deny

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<sup>1</sup> Except to those requests, Petitioner has specifically stated he wants "confirmed or denied". Those items will be addressed at the end of this Opposition.

These admissions are consistent with the responses already made to the respective requests in TWSI's original discovery response.

TWSI believes it has fully responded to all requested discovery or has filed a proper objection. Based on the foregoing, TWSI respectfully requests the hearing officer to deny Petitioner's Motion to Compel.

Respectfully submitted,



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Jeff Riden BPR #32769  
General Counsel  
Tennessee Wastewater Systems, Inc.  
851 Aviation Parkway  
Smyrna, TN 37167  
615-220-7171  
[jeff.riden@adenus.com](mailto:jeff.riden@adenus.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing document has been served upon:

Ronald C. McCabe, CPA  
5501 Bellview Ave.,  
New Port Ritchey, FL 34652  
rcmbizz@hotmail.com

and

Karen Stachowski, Senior Assistant Attorney General  
Financial Division, Consumer Advocate Unit  
Office of Tennessee Attorney General  
P.O. Box 20207  
Nashville, Tennessee 37202  
Karen.Stachowski@ag.tn.gov

via email on this 6th day of March 2023.

Jeff Riden

