

TENNESSEE PUBLIC UTILITY COMMISSION



502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

September 10, 2026

Gary Caleb Davidson
Highland Lake Camp, Inc.
400 E. Hull Avenue
Gainsboro, TN 38562

Electronically Filed in TPUC Docket Room
on September 10, 2026 at 1:53 p.m.

Via Email

*Request for Letter of Determination Regarding Certificate of
Convenience and Necessity, Docket No. 26-00071*

Dear Mr. Davidson:

On August 7, 2026, as President of Highland Lake Camp, Inc. (“Highland Lake” or “Campground”), you filed a letter and attachments (together “Request”) with the Tennessee Public Utility Commission (“Commission” or “TPUC”) requesting a letter of determination regarding whether a Certificate of Public Convenience and Necessity (“CCN”) would be required based on the proposed plans for a sewer system (“System”) at Highland Lake. The Request states the Campground is being “developed on approximately 500 acres and will provide overnight accommodations and outdoor recreational opportunities for guests.”¹ According to the Request, the current phase of the Campground will have six rental cabins and seven RV sites with full utility hookups, and the System will be used exclusively for the Campground and its guests.² The Request states the System “will serve only the campground’s facilities and guests located on property controlled by Highland Lake Camp, Inc. Wastewater

¹ Request, p. 1 (August 7, 2026).

² *Id.*

services will not be offered to neighboring properties, off-site customers, or the general public.”³

Tenn. Code Ann. § 65-4-101(6)(A) defines a public utility as:

every individual, copartnership, association, corporation, or joint stock company, its lessees, trustees, or receivers, appointed by any court whatsoever, that own, operate, manage or control, within the state, any interurban electric railway, traction company, all other common carriers, express, gas, electric light, heat, power, water, telephone, telegraph, telecommunications services, or any other like system, plant or equipment, affected by and dedicated to the public use, under privileges, franchises, licenses, or agreements, granted by the state or by any political subdivision thereof.

Based on the information provided in the Request, Highland Lake does not appear to be a public utility, as defined by Tenn. Code Ann. § 65-4-101(6), because the System will be owned, operated, and maintained by Highland Lake for the exclusive use of the guests of the Campground. Therefore, since Highland Lake does not appear to be a public utility, it is not required to obtain a CCN from the Commission. If any of the facts or circumstances set forth in the Request regarding the provision of sewer service at Highland Lake should change, Highland Lake must notify the Commission immediately.

Sincerely,


Monica Smith-Ashford, Senior Counsel

³ *Id.*