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October 19, 2009

filed electronically in docket office on 10/20/09

Ms. Darlene Standley, Chief
Utilities Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Subject: Docket No. 09-00056
Petition of Cartwright Creek, LLC to Change and Increase Rates and Charges
Response to CAPD Additional Discovery Request of October 9, 2009

Dear. Ms. Standley,

Attached for filing is Cartwright Creek's response to the Consumer Advocate and Protection Division's October 9, 2009 Additional Discovery Request.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce E. Meyer", is written over a light blue horizontal line.

Bruce E. Meyer
Vice President – Operations
Cartwright Creek, LLC

Copies: Sharla Dillon, TRA

- Electronic version via email
- Original and five hard copies via FedEx.)

Mary Leigh White – CAPD (via email)

Henry Walker – Counsel for Waterbridge (via email)

Cartwright Creek Response to CAPD Additional Discovery Request of 10-9-09

CAPD Requested Information and Documentary Materials

1. Please provide a further breakdown of the \$125,000 in expenses referenced in TRA Staff Data Request No. 2, Question 10. Your breakdown should include the account name, an identification of which expenses are directly associated with the Waterbridge Development, which expenses are directly associated with the acquisition of Cartwright Creek, and an identification of the purposes for any other expenses.

Response: Please see Attachment A entitled "Analyses of Cartwright Creek Capitalized Expenses 2004-2005."

Petition of Cartwright Creek, LLC to
Change and Increase Rates and Charges
Docket No. 09-00056
Response to CAPD Additional Discovery Request of October 9, 2009

Attachment A

Analyses of Cartwright Creek Capitalized Expenses 2004-2005

Sheaffer International, LLC.
Analyses of Cartwright Creek
Capitalized Expenses 2004-2005

| | Date | Num | Name | Amount | Waterbridge | Other Cartwright Creek | Memo |
|--|------------------|-------------------|------------------------|------------|--------------------|------------------------|--|
| Cartwright Creek , LLC | | | | | | | |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | | | | Services Rendered between 1/1/04 and 5/31/05 in support of Waterbridge CCN, and Cartwright Creek. |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | 59,400.00 | 23,100.00 | 36,300.00 | Dr. John R. Sheaffer, Project Director \$300 x 198 |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | 3,885.00 | 630.00 | 3,255.00 | Larry J. LeDay, Project Designer \$105 x36 Design for Old Natchez Sheaffer System / Waterbridge Construction Pricing |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | 6,250.00 | 6,250.00 | 0.00 | Joseph F. Del Nuovo, Senior Construction Manager \$125 x 51 hours - Development of construction estimate/discussions with contractor |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | 1,980.00 | 1,980.00 | 0.00 | Bruce E. Meyer, Project Engineer \$165 x 12 hours -Construction estimate |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | 600.00 | 600.00 | 0.00 | Nathan B. Hinch, Research Assistant \$75per hour 6 hours - Williamson County Zoning |
| | 08/24/2005 | 100596 | Cartwright Creek , LLC | 13,375.00 | 6,750.00 | 6,625.00 | Issue Research / Soils Mapping Robert Cochrane- Financial Services @ \$125 per hour 107 hours |
| Total Cartwright Creek , LLC | | | | 85,490.00 | 39,310.00 | 46,180.00 | |
| | | | | | | | |
| | 03/31/2005 | 14124-02M | Cartwright Creek , LLC | 585.00 | | 585.00 | |
| | 02/28/2005 | 14124-00M | Cartwright Creek , LLC | 32.50 | 32.50 | 0.00 | |
| | 01/31/2005 | 14124-02M | Cartwright Creek , LLC | 951.50 | 434.00 | 517.50 | |
| | 12/31/2004 | 14124-01M | Cartwright Creek , LLC | 2,645.00 | 2,645.00 | 0.00 | |
| | 11/30/2004 | 14124-01M | Cartwright Creek , LLC | 2,443.75 | 2,443.75 | 0.00 | |
| | 10/31/2004 | remaining balance | Cartwright Creek , LLC | 1,430.00 | | 1,430.00 | |
| | 09/30/2004 | | Cartwright Creek , LLC | 2,082.75 | | 2,082.75 | |
| | 09/21/2004 | 14124-00M | Cartwright Creek , LLC | 603.75 | 230.00 | 373.75 | |
| | 07/31/2004 | 14124-00M | Cartwright Creek , LLC | 1,150.00 | 172.50 | 977.50 | |
| | 06/30/2004 | 14124-00M | Cartwright Creek , LLC | 3,865.00 | 460.00 | 3,405.00 | |
| Total | | | | 15,789.25 | 6,417.75 | 9,371.50 | |
| | | | | | | | |
| Other Expenses: | | | | | | | |
| | | | | | | 0.00 | |
| Stahelin Properties In-house Counsel | | | | 5000 | | 5,000.00 | |
| Other Reimbursable Expenses: American Expense /John Sheaffer/Cochrane | | | | 15313.05 | 35.6 | 15,277.45 | |
| TN Department of Environment and Conservation Check 6673 10/14 | | | | 250.00 | 250.00 | 0.00 | |
| Bruce Meyer Waterbridge Irrigation Mapping | | | | 1143.74 | 1143.74 | 0.00 | Waterbridge |
| John R. Sheaffer Waterbridge Expenses June 17- 20, 2004 | | | | 669.08 | 669.08 | 0.00 | Negotiations regarding CC takeover of Waterbridge |
| | | | | | | 0.00 | |
| American Expense Airfare Cochrane Sheaffer Car Rental 1/10/2005 | | | | 515.93 | 515.93 | 0.00 | |
| Joe DelNuovo 1/21/05 meet with contractor regarding estimate | | | | 315.8 | 315.8 | 0.00 | |
| John R. Sheaffer Trip to Nashville (50% included Thompson Station) 4/15/04 | | | | 159.9 | 159.9 | 0.00 | One Half of Trip Other Half Thompson Station related (50% of \$319.80) |
| John R. Sheaffer Trip to Nashville 11/8-9/2004 | | | | 385.6 | 385.6 | 0.00 | |
| | | | | 23,753.10 | 3,475.65 | 20,277.45 | |
| Total Amount per Invoice 100596 dated 8/24/2005 | | | | 125,032.35 | 49,203.40 | 75,828.95 | |
| | | | | | | | |
| John R. Sheaffer Hours for Waterbridge expenses shown above | | | | | | | |
| Various Discussions with Cartwright Creek LLC group | 3/19/2004;11/8-9 | | | 24 hours | Sheaffer | | |
| Various Discussions with Cartwright Creek LLC group | | | | 10 hours | Sheaffer | | |
| Various Discussions with Williamson County Planning regarding PGA 5 | | | | 14 hours | Sheaffer | | |
| Attendance at TRA Meeting regarding Waterbridge PGA 5 CCN | 1/10/2005 | | | 8 hours | Sheaffer | | |
| Preparation of testimony for PGA 5 CCN | | | | 10 hours | Sheaffer | | |
| Attendance at Cartwright Creek TDEC Permit Public Hearings | 8/2004 | | | 8 hours | Sheaffer | | |
| Discussions with Waterbridge regarding development April 2005 | | | | 3 hours | Sheaffer | | |
| Total | | | | 77 | x \$300 = \$23,100 | | |
| Robert Cochrane Hours for Waterbridge expenses shown above | | | | | | | |
| Preparation of testimony for PGA 5 CCN | | | | 36 hours | Cochrane | | |
| Discussions with William Blair/Waterbridge LLC regarding plant financing | | | | 8 hours | Cochrane | | |
| Review of Construction Estimate | | | | 2 hours | Cochrane | | |
| Attendance at TRA Meeting regarding Waterbridge PGA 5 CCN | 1/10/2005 | | | 8 hours | Cochrane | | |
| Total | | | | 54 | x \$125 = \$6,750 | | |