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February 9, 2010

Sent via Electronic Submission

filed electronically in docket office on 02/09/10

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

**RE: Integrated Resource Management, Inc.'s Petition to Amend its
Certificate of Convenience and Necessity (Docket No. 09-00099)**

Dear Ms. Standley:

To further assist the Tennessee Regulatory Authority (the "Authority") in its review of Integrated Resource Management, Inc.'s ("IRM") Petition to Amend its Certificate of Convenience and Necessity to provide wastewater utility services to the portion of Decatur County, Tennessee known as Riverstone Estates, IRM provides the following enclosed documents:

- 1) An Amendment to the Pre-Filed Direct Testimony of Jeffrey W. Cox, Sr.
- 2) An Amended Build-out Plan
- 3) A letter from Jason Scott, Mayor of Decatur County, Tennessee
- 4) Tariff Residential and Commercial Rate Sheets

In accordance with the rules of the Authority, IRM submits these enclosed documents electronically along with four (4) written copies to be delivered directly to the Authority. Should you have any questions, please do not hesitate to contact myself or Mr. Chuck Welch at (615) 726-1200.

Respectfully submitted,

Farris Mathews Bobango PLC



Reen L. Locker

CC: Jeffrey Cox via Email

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF INTEGRATED RESOURCE)
MANAGEMENT, INC. d/b/a IRM UTILITY,)
INC. TO AMEND ITS CERTIFICATE OF) **Docket No. 09-00099**
PUBLIC CONVENIENCE AND NECESSITY)
TO SERVE AN AREA IN DECATUR)
COUNTY, TENNESSEE KNOWN AS)
RIVERSTONE ESTATES)

**AMMENDMENT TO THE
PRE-FILED DIRECT TESTIMONY OF JEFFREY W. COX, SR.**

Q: Please state your name for the record and your position with the Petitioner, Integrated Resource Management, Inc. d/b/a IRM Utility, Inc. (“IRM”).

A: Jeffrey W. Cox, Sr. I am the President of IRM.

Q: Are you presenting testimony on behalf of IRM?

A: Yes. I previously filed Pre-Filed Direct Testimony with the Tennessee Regulatory Authority (the “Authority”) on July 13, 2009. At the time of filing, the information included was true and accurate to the best of my knowledge, information and belief. Due to the dynamics of the current economy as well as a change in ownership with the developer, some delays have occurred since the date of filing to which IRM would like to make the Authority aware. The following four questions will address these delays as well as provide additional information to the Authority.

Q: Will the change in ownership affected how IRM will serve Riverstone Estates?

A: No. The managing partner is still Jeff Wilkes. The only change was that shares of stock were transferred to the new owner.

Q: Where specifically is Riverstone Estates located in Decatur County, Tennessee?

A: The property, in its entirety, is in Decatur County, Tennessee. The property borders State Route 114 from the entrance of Riverstone Estates at mile marker one (1) to the Kentucky Lake Bridge.

Q: Can you describe the service you will be providing?

A: Yes. The service IRM will be providing will be the same as we have petitioned for in the past. IRM will be operating an onsite biological/natural wastewater treatment facility that beneficially reuses the water in subsurface drip irrigation systems.

Q: How many customers will be served by the proposed system? How many of these units will be commercial, residential and rental?

A: There will be approximately one-hundred and fifty (150) residential customers. The homes will be a combination of primary residences, vacation homes, and possibly rental units. There will be a seventy (70) seat restaurant and a marina.

Currently, there are three small homes that have been managed as overnight rental units. They are presently for sale as residences or vacation homes. There may be more rentals in the future.

The Riverstone Estates project is approved for the treatment and disposal of approximately 50,000 gallons per day. This amount can be divided as per the needs of future sales. There is no zoning in Decatur County. Therefore, the developer can offer sales of different uses according to the marketable product until capacity is met.

Attached is an amended Build-out Plan to provide the Authority more detail and to assist in explaining the future customers whom are to be serviced by the proposed system.

Q: Has IRM contacted other utility service providers in the area to determine if they have potential plans to service the area?

A: Yes. We have received letters from both the Mayor of the Town of Scotts Hill as well as from the Mayor of Decatur County, both verifying they do not have plans to service the area. The letter from the Mayor of Decatur County is enclosed herewith.

Q: Is all of the information in the Petition accurate to the best of your knowledge, information, and belief?

A: Yes.

Q: Does this conclude your additional testimony?

A: Yes.

STATE OF TENNESSEE)
COUNTY OF Jefferson)

JEFFREY W. COX, SR., having been first duly sworn, makes oath that the statements contained in the foregoing Amendment to the Pre-Filed Direct Testimony are true to the best of his knowledge, information, and belief.



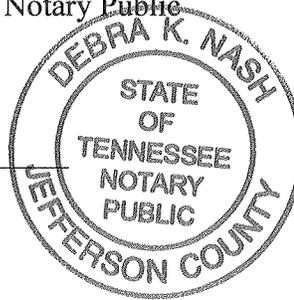
JEFFREY W. COX, SR.

SWORN TO AND SUBSCRIBED before me, on this the 5 day of Feb., 2010.



Notary Public

My Commission Expires: 12-7-13



Riverstone Estates

Decatur County

Projected Commercial Build-out Plan = 2

Total Number of Residential Customers = 150

Year	Residential Residential Rate	Commercial Commercial Rate	Unimproved Lots Annual Assessment
2010	23	1	127
2011	28	1	122
2012	34	1	116
2013	40	2	110
2014	46	2	104

The expected build-out is conservative with low water use. Cabin Rentals are considered as residential rates in this model to be conservative. Total build-out will be longer than five years.

*Estimated System Expenses & Revenues for Five Years

	2010 6-mos.	2011	2012	2013	2014
Expenses	9,995.00	24,529.76	23,843.49	30,452.69	31,522.14
Revenue:	10,995.18	23,676.96	25,700.88	32,502.00	34,521.92

DECATUR COUNTY
JASON SCOTT, MAYOR

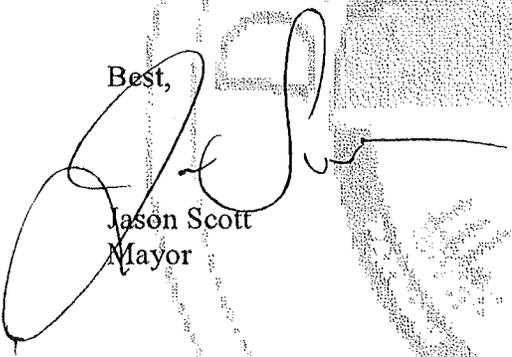
February 4, 2010

Mr. Jeff Wilkes
890 Pickwick St.
Savannah, Tennessee
38372

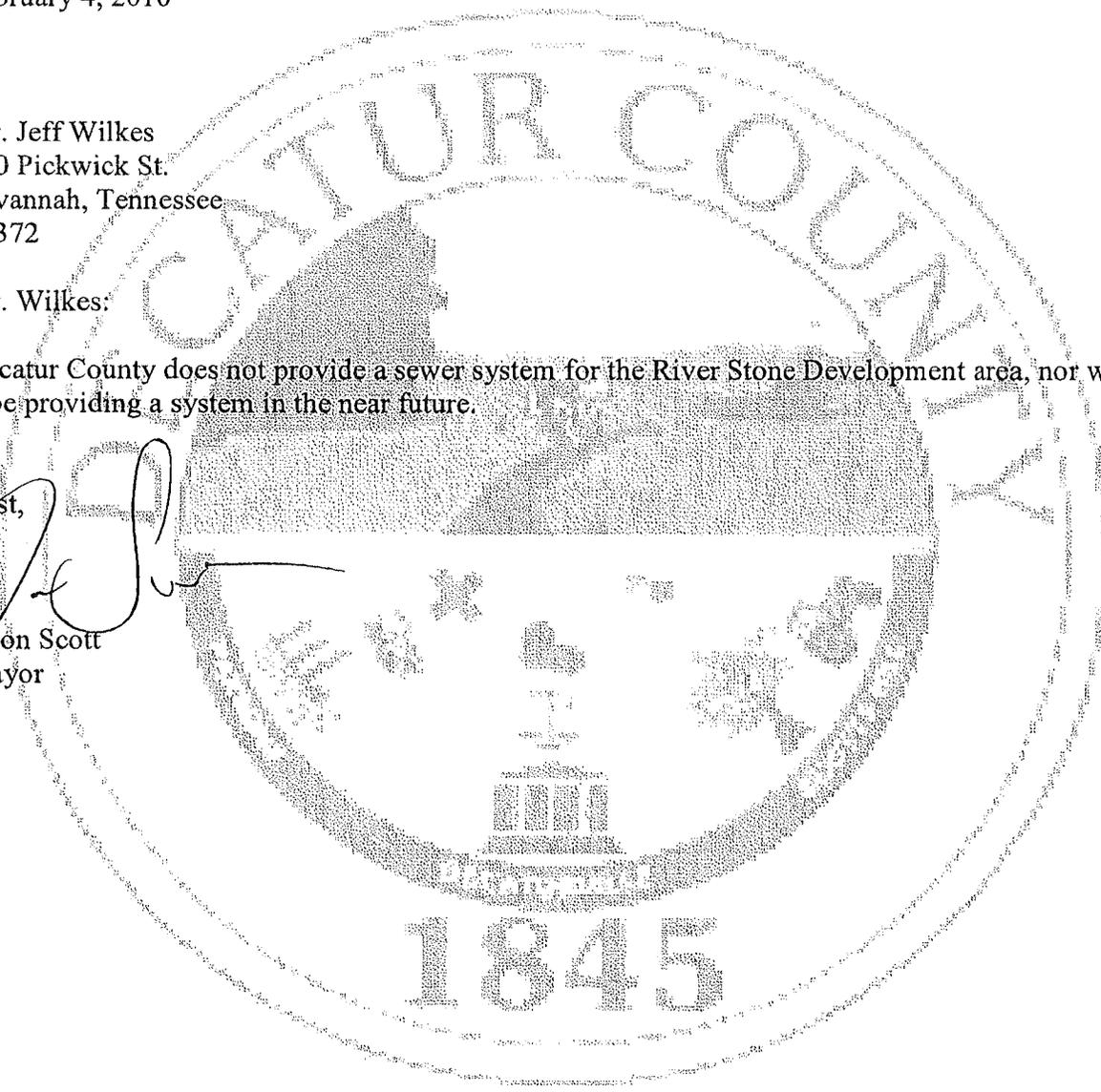
Mr. Wilkes:

Decatur County does not provide a sewer system for the River Stone Development area, nor will it be providing a system in the near future.

Best,



Jason Scott
Mayor



P.O. Box 488/Decaturville, TN/38329
Phone: 731-852-2131/Fax: 731-852-2130
scottj@decaturcountyttn.org

Received Time Feb. 5. 12:59PM

Wastewater Utility Service

RESIDENTIAL RATES SHEET

RATE CLASS 1

Fixed Film Treatment and Drip Dispersal.....\$35.11

Effective October 22, 2007, \$10.13 of the residential rate will be placed in the Company's escrow account.

Wastewater Utility Service

COMMERCIAL RATE (WITHOUT FOOD SERVICE)

The sewer bill will be charged on a monthly basis. The customer will provide a system that has an expected design flow and quality characteristics. Special conditions such as high treatment requirement or high flows may make other systems than addressed in this initial petition necessary. IRM Utility, Inc. will need to petition for rates on a case by case basis for such systems.

A minimum service charge will be \$75.00 per month for the first 300 gallons per day of design flow expected. For each additional 100 gallons per day, up to 1,000 gallons per day, an additional charge of \$15.00 per month per 100 gallons will be charged. For design flows expected over 1,000 gallons per day, up to 3,000 gallons per day, the following additional monthly charges per 1,000 gallons of daily flow will apply:

Treatment	Disposal		
	Sub-surface Drip Irrigation	Point Discharge	Off-Site
Sand, Gravel, Media Filters	\$140.00	\$165.00	-
Lagoon	\$116.00	\$140.00	-
Off-site	-	-	Pass-through & \$73.00

For design daily flows over 3,000 gallons, the monthly charge on all system configurations will be \$116.00 per 1000 gallons of daily flow.

Additional surcharges will apply when customers exceed their expected design flows. For any month that a customer's water meter reading exceeds the expected design flow, the following surcharges will apply:

Excess Water Usage	Surcharge
1 gallon to 1,000 gallons above expected design flow	\$175.00
1,001 gallons to 2,000 gallons above expected design flow	\$200.00
Over 2,000 gallons above expected design flow	\$200.00/1000 gals

If the water meter readings exceed the design flow or analysis indicates that effluent characteristics are not as indicated by the customer's design engineer, the monthly charge will be revised to reflect the increased usage and any capital costs associated with increasing the capacity of the system or upgrading the treatment for the greater loading will be paid by the customer.

Effective October 22, 2007, 29% of the billed rate from all Commercial customers, including special contract customers, will be placed in the Company's escrow account.

Fees: Nonpayment – 5% Disconnection - \$10.00 Reconnection - \$15.00 Returned Check - \$35.00.

Wastewater Utility Service

COMMERCIAL RATE (WITH FOOD SERVICE)

The sewer bill will be charged on a monthly basis. The customer will provide a system that has an expected design flow and quality characteristics. Special conditions such as high treatment requirement or high flows may make other systems than addressed in this initial petition necessary. IRM Utility, Inc. will need to petition for rates on a case by case basis for such systems.

A minimum service charge will be \$100.00 per month for the first 300 gallons per day of design flow expected. For each additional 100 gallons, up to a total of 1,000 gallons per day, an additional charge of \$18.00 per month per 100 gallons will be charged. For design flows expected over 1,000 gallons per day, up to 3,000 gallons per day, the following additional monthly charges per 1,000 gallons of daily flow will apply:

Treatment	Disposal		
	Sub-surface Drip Irrigation	Point Discharge	Off-Site
Sand, Gravel, Media Filters	\$170.00	\$192.00	-
Lagoon	\$142.00	\$163.00	-
Off-site	-	-	Pass Through & \$94.00

For design daily flows over 3,000 gallons, the monthly charge on all system configurations will be \$142.00 per 1000 gallons of daily flow.

Additional surcharges will apply when customers exceed their expected design flows. For any month that a customer's water meter reading exceeds the expected design flow, the following surcharges will apply:

Excess Water Usage	Surcharge
1 gallon to 1,000 gallons above expected design flow	\$210.00
1,001 gallons to 2,000 gallons above expected design flow	\$220.00
Over 2,000 gallons above expected design flow	\$220.00/1000 gals

If the water meter readings exceed the design flow or analysis indicates that effluent characteristics are not as indicated by the customer's design engineer, the monthly charge will be revised to reflect the increased usage and any capital costs associated with increasing the capacity of the system or upgrading the treatment for the greater loading will be paid by the customer.

Effective October 22, 2007, 29% of the billed rate from all Commercial customers, including special contract customers, will be placed in the Company's escrow account.

Fees: Nonpayment – 5% Disconnection - \$10.00 Reconnection - \$15.00 Returned Check - \$35.00.

Wastewater Utility Service

COMMERCIAL RATE—OVERNIGHT RENTAL UNITS

The monthly sewer charge per customer is based upon the monthly average daily flow monitored from the unit being served. A minimum of \$75.00 per month will be charged for up to the first 300 gallons per day of average daily flow. For each additional 100 gallons per day of average daily flow, up to a total of 1,000 gallons per day, an additional charge of \$15.00 per month per 100 gallons levied. For average daily flows over 1,000 gallons per day, the following additional monthly charges per 1,000 gallons of average daily flow will apply:

Treatment	Disposal		
	Sub-surface Drip Irrigation	Point Discharge	Off-Site
Fixed Film	\$140.00	\$165.00	-
Lagoon	\$116.00	\$140.00	-

If a Customer's usage exceeds the average daily design flow for 3 consecutive months, the Customer may be required to pay any capital costs associated with increasing the capacity of that portion of the system designed and dedicated to serve such Customer.

Effective October 22, 2007, 29% of the billed rate from all Commercial customers, including special contract customers, will be placed in the Company's escrow account.

Fees: Nonpayment - 5% Disconnection - \$10.00 Reconnection - \$15.00 Returned Check - \$35.00.