TENNESSEE Wastewater
an Adenus Utility

851 Aviation Parkway
Smyrna, TN 37167

August 1, 2014

Mr. David Foster, Chief
Utilities Division
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: Docket # 14-00006 – Scales Project - Data Response

Dear Mr. Foster:

Tennessee Wastewater Systems, Inc. provides the following supplemental information per your request dated July 30, 2014.

1. Explain the company's reasoning and overall rationale (and specific criteria) for not requiring the Developer/Contractor to install a drip field prior to the Utility accepting ownership to the wastewater system? **What are the criteria used in determining when a drip should be built and who makes that decision?**

Response: Standard design criteria for facultative ponds have been established as part of the plans which have been submitted and approved by TDEC for all permitted sites of this nature. This criteria benefits both TWS and the ratepayers by deferring the ongoing operational expenses (such as purchased power and remote telemetry monitoring) until the system has the critical mass of customer revenue needed to offset those expenses.

One of the standards established is the delay of installing the drip system until the pond has reached 75% of its holding capacity. TWS performs monthly site visits on all of its permitted systems and inspection of the lagoon level is part of that process. When the lagoon approaches 75% of capacity, the operator notifies the Chief Technical Officer (CTO-Engineer). The CTO then visits the site and determines the timeframe for installing the drip system. The initial evaluation is done visually, but if necessary the CTO will use laser levels or other depth measuring equipment to verify the status of the pond. When CTO determines that it is time to install the drip system, he notifies the President of TWS who then schedules the installation.

The lagoons typically take several years to reach capacity, and would take at least another year to reach normal operating level. No TWS pond has ever reached operating level prior to drip irrigation being installed. Paris Landing was the first lagoon to reach 75%, and drip was installed six years ago. The system started discharging approximately two years later after reaching normal operating levels. Maple Green (TRA 00-01128) was installed earlier this year. Several of the sites have little or no flow coming to the systems. Clarkrange (TRA 05-00162), Cross Plains (TRA 05-00293), and the Highlands at Big South Fork (TRA 05-00162) have less than 5 customers per system, and are at low levels. Dyers Hollow is approaching 75% full and drip is scheduled to be installed.

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If you have any further questions, or need any additional information, please feel free to contact me.

Sincerely,

Matt Pickney, Operations Manager
Tennessee Wastewater Systems, Inc.