STATE OF TENNESSEE

Office of the Attorney General



HERBERT H. SLATERY III ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202 TELEPHONE (615)741-3491 FACSIMILE (615)741-2009

May 8, 2017

Benjamin A. Gastel, Esq.
Branstetter, Stranch & Jennings, PLLC
The Freedom Center
223 Rosa L. Parks Avenue, Suite 200
Nashville TN 37203
615-254-8801
615-255-5419 (fax)
beng@bsjfirm.com

Re:

Tennessee Public Utility Commission, Docket No. 17-00014, Petition of Integra Water Tennessee, LLC for a Certificate of Public Convenience and Necessity and Authority to Charge Rates in Casey Cove Subdivision Located in Dekalb County, Tennessee

Dear Mr. Gastel:

We are seeking clarification in your client's response to the Tennessee Public Utility Commission's (TPUC) Data Request, Integra Water Tennessee, LLC (Integra Water). Specifically in response to Data Request Number 28, Integra Water states "[t]he Petition is incorrect. Integra Water is applying for a \$90 flat rate per connection. We will modify the petition and resubmit." Does Integra Water mean it will be amending the *Petition* it filed on February 8, 2017 or will it file a new petition?

It is the Consumer Advocate's position that a new procedural schedule will be necessary whether the petition to be filed is new or amended. We would like to work out a new procedural schedule, but will need to know when will the amended petition or new petition be filed with TPUC? Resolving a new procedural schedule is important as deadlines are quickly approaching such as discovery requests due tomorrow, May 9, 2017.

We also do not have a protective order issued in this matter. The Consumer Advocate provided a draft proposed agreed protective order on April 20, 2017, but have not received a response to date.

Thank you for your time and consideration of this matter. If you have questions regarding this request, please contact me at (615) 741-2370.

Respectfully,

Karen H. Stachowski

Assistant Attorney General

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cc: Pa

Patsy Fulton, TPUC

Monica Smith-Ashford, TPUC