

STATE OF TENNESSEE

Office of the Attorney General



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May 30, 2017

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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:

This letter is a follow-up to our letter dated May 8, 2017 seeking clarification on whether the Company would be filing of an amended petition or new petition. On May 18, 2017, the Company filed an Amended Petition requesting approval of a tariff with a "flat monthly rate of \$90 per residential unit and other charges set forth in a tariff and approve the rules and regulations for service in the tariff." The Consumer Advocate has reviewed the Amended Petition, and reviewed the Company's responses to TPUC's Data Request and the Consumer Advocate's Discovery Request.

The Consumer Advocate's position continues to be that a new procedural schedule is necessary with the filing of an Amended Petition. The increase of the flat monthly rate from \$60.00 in the *Initial Petition* filed in February 2017 to \$90.00 in the Amended Petition filed this month is a significant increase of 50% over the original filing. In addition to this recent, significant change in the flat rate, the Company's *Petition*, even amended, is deficient. Some samples of the Company's numerous deficiencies include:

- Tariff
  - Not filed with *Initial Petition* in February 2017. Filed in response to TPUC Data Request #21 on May 1, 2017.
  - Deficient Schedule of Rates and Charges
    - Simply lists monthly service rate.
    - Does not include such fees as “new account”; “reconnection”; “returned check” or “online credit card convenience”.
    - Does not explain grounds for service termination by utility or a process to dispute a service termination.
    - Does not explain if a procedure is available for a payment plan for past due bills, returned checks, or disconnect/reconnect charges.
    - Does not include emergency contact information.
    - Does not explain procedure for change in ownership.
    - In Addendum 1 of the Initial Petition, it states that bills are past due 15 days after the billing date. However, the Tariff provided in the TPUC Data Request says a late fee penalty is not assessed until a bill is 25 days after the billing date.
- Deficiencies in Addendum 1 of the *Initial Petition*
  - Exhibit 13, Audited Financial Report on Integra Water Tennessee
    - The Company states “Submitted Separately as Confidential Information”. No documents were submitted confidentially with the *Initial Petition*.
    - In response to Consumer Advocate Request #1-26, the Company states “Integra Water Tennessee, LLC does not have audited financials”.
  - Exhibit 14, Audited Financial Report on Integra Water
    - The Company states “Submitted Separately as Confidential Information”. No documents were submitted confidentially with the *Initial Petition*.
    - In response to Consumer Advocate Request #1-26, the Company states “Integra Water, LLC does not have audited financials”.
  - Exhibit 18, TN Region OH Allocation
    - The Company states “Provided Upon Request”.
    - Consumer Advocate requested this information in its Discovery Request #1-28, the Company provided no response. The Consumer Advocate followed up with the Company about the lack of response.

The Company states the request was overlooked and it will respond soon with information.

- Exhibit 19, TN Corporate OH Allocation
  - The Company states “Provided Upon Request”
  - Consumer Advocate requested this information in its Discovery Request #1-29, the Company provided no response. . The Consumer Advocate followed up with the Company about the lack of response. The Company states the request was overlooked and it will respond soon with information.

We would like to work out a new procedural schedule with you so the case can move forward as expeditiously as possible. Could you advise us when the Company anticipates having a complete filing for review? This will permit us to work out a procedural schedule. 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

cc: Patsy Fulton, TPUC  
Monica Smith-Ashford, TPUC