

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

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IN RE: )  
PETITION OF INTEGRA WATER TENNESSEE, LLC )  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE ) Docket No. 17-00014  
AND NECESSITY AND TPUC TO CHARGE RATES IN )  
CASEY COVE SUBDIVISION LOCATED IN DEKALB )  
COUNTY, TENNESSEE )

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**PETITIONER'S AMENDED AND SUPPLEMENTED RESPONSES TO FIRST  
DISCOVERY REQUEST OF THE CONSUMER PROTECTION AND ADVOCATE  
DIVISION TO INTEGRA WATER TENNESSEE, LLC**

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Petitioner Integra Water Tennessee, LLC. (Company), provides these Amended and Supplemental Responses to the Consumer Protection and Advocate Division of the Attorney General's Office ("Consumer Advocate") to correct an error in its original responses. Specifically, responses to Requests 28 and 29 were omitted due to a clerical error. As a result, Petitioner hereby files the corrected version of responses to Requests 28 and 29.

**AMDNED AND SUPPLEMENTAL RESPONSES**

**REQUEST 28:** Refer to the list of addendum & exhibits filed with the Company's *Initial Petition*. Provide Exhibit 18 TN Region OH Allocation and a narrative description of the allocation..

**RESPONSE:** Included in the estimated cost of service for Casey Cove is \$1,000 for Regional OH and \$1,500 for Corporate OH. While the specific services listed below will be provided from Integra Water's North Carolina subsidiary (ONSWC) and tracked and billed separately to Integra Water Tennessee, various other cost necessary to provide these services are allocated. Included in the \$1,000 for Regional OH are:

1. Real Property Leases
2. Phone System
3. Utilities
4. Insurances (GL, Umbrella, etc)

5. Business Licenses (Franchise Fees, etc)
6. Other Misc. expenses

Regional OH includes those cost allocated to Casey Cove for OH expenses incurred through from our North Carolina office. These include overhead cost necessary for ONSWC to provide the following services:

- Legal
- Engineering & Technical Assistance
- Compliance
- Administration
- Recruiting
- Operational and Compliance Support
- Regulatory & Rate Support

Legal: ONSWC may assist Integra Tennessee in retaining outside council retained to represent Integra Tennessee. This may include finding qualified legal counsel for specific legal matters and assisting with negotiating fees and terms.

Engineering & Technical Assistance: ONSWC may assist Integra Tennessee in retaining outside engineering support retained to represent Integra Tennessee. This may include finding qualified engineers for specific engineering matters and assisting with negotiating fees and terms. In addition, ONSWC may provide technical assistance to operational personnel.

Compliance: ONSWC may assist Integra Water Tennessee with regulatory support. This may include coordination with TDEC, TRA and other regulatory agencies.

Administration: Michael Myers, the President of Integra Water Tennessee resides in North Carolina and may provide leadership and decision making regarding operation and financial matters for Integra Water Tennessee. John McDonald, Member of Integra Water, resides in Birmingham, Alabama and may provide leadership and decision making regarding accounting and financial matters. Additionally, the Administration staff may assist Integra Water Tennessee with various data entry, filing, expense report, and other administrative duties.

Recruiting: ONSWC may assist Integra Water Tennessee with recruiting and other HR related functions. This includes development of position descriptions, job ads, administration of personnel manuals, etc. Duties may also extend to assisting with placement of job ads in appropriate publications.

Operational & Compliance Support: ONSWC many assist Integra Water Tennessee with operational & compliance support. This would be supplemental to the support provided by Engineering personnel.

Regulatory and Rate Support: Integra Water utilizes a multi-disciplined approach to regulatory and rate support and as such both ONSWC and Integra Water may provide testimony, support to filings and data request.

**REQUEST 29:** Refer to the list of addendum & exhibits filed with the Company's *Initial Petition*. Provide Exhibit 19 TN Corporate OH Allocation and a narrative description of the allocation.

**RESPONSE:**

Included in the estimated cost of service for Casey Cove is \$1,000 for Regional OH and \$1,500 for Corporate OH. While the specific services listed below will be provided from Integra Water's Alabama Office (Integra Water) and tracked and billed separately to Integra Water Tennessee, various other cost necessary to provide these services are allocated. Included in the \$1,500 for Corporate OH are:

- Real Property Leases
- Phone System
- Utilities
- Insurances (GL, Umbrella, etc)
- Business Licenses (Franchise Fees, etc)
- Other Misc. expenses

Corporate OH includes those cost allocated to Casey Cove for OH expenses incurred through from our Alabama office. These include overhead cost necessary for Integra Water to provide the following services:

- Accounting & Financial Support
- Administration
- Regulatory & Rate Support

Accounting and Financial Services: Integra will assist in the preparation and implementation of accounting methods and procedures to determine that they conform fully to the requirements, rules and regulation of governmental authorities having jurisdiction over Integra Water Tennessee and will review Integra Water Tennessee monthly financial reports, annual reports and other reports, including those to any governmental authorities. Integra will advise and assist in the establishment and maintenance of current record keeping techniques; review accounting procedures, methods and forms; and evaluate systems of internal control for receipt and disbursement of funds, materials and supplies, and other assets. Integra will assist in the maintenance of accounting records as required by Integra Water Tennessee. When appropriate, Integra will cooperate and consult with Integra Water Tennessee's certified public accountants. Integra will provide assistance to Integra Water Tennessee in the preparation of all financial reports and provide said financial reports to Integra Water Tennessee Management on a monthly basis no later than the 10th of following month. Integra will also provide services related to accounts payable, payroll, consolidation, budgeting and long-range planning.

Integra will assist in the preparation of operating and construction budgets and monitor the control over such budgets by comparing experienced costs to the projections. Integra will prepare or assist in the preparation of federal, state and local tax returns for and to the extent required by Integra Water Tennessee.

Administration: Michael Myers, the President of Integra Water Tennessee resides in North Carolina and may provide leadership and decision making regarding operation and financial matters for Integra Water Tennessee. John McDonald, Member of Integra Water, resides in Birmingham, Alabama and may provide leadership and decision making regarding accounting and financial matters. Additionally, the Administration staff may assist Integra Water Tennessee with various data entry, filing, expense

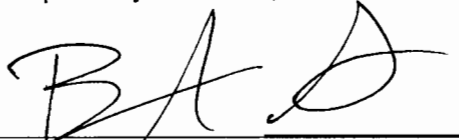
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report, and other administrative duties.

Regulatory and Rate Support: Integra Water utilizes a multi-disciplined approach to regulatory and rate support and as such both ONSWC and Integra Water may provide testimony, support to filings and data request.

Date: June 23, 2017

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was sent by U.S. Mail, postage prepaid and electronic mail on this the June 23, 2017 to the following:

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