

STATE OF TENNESSEE

Office of the Attorney General



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April 25, 2019

Hon. Robin L. Morrison, Chairperson  
c/o Sharla Dillon  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

RE: Tennessee Wastewater Systems, Inc., Petition to Amend Its Certificate of Convenience  
and Necessity, TPUC Docket No. 18-00107

Dear Chairperson Morrison:

Since the submission of Tennessee Wastewater Systems, Inc.'s (TWSI) Petition in the above-referenced matter on October 16, 2018, TWSI and the Consumer Advocate Unit in the Financial Division of the Office of Attorney General (Consumer Advocate) have been involved in cooperative discussions and have exchanged various information related to the Petition. With the submission of discovery responses by TWSI and Consumer Advocate's Testimony of Alex Bradley<sup>1</sup>, the Parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer. Moreover, after considering the entire record, it is the joint position of the Parties that this matter is ripe for consideration on the merits by the Tennessee Public Utility Commission. At this time, there remain no outstanding disputes between the Parties with respect to this Docket, as clarified by and through discovery, the Parties' communications and pre-filed testimony. As reflected in the Pre-filed Testimony of Mr. Bradley, there are no contested issues between the Parties on the merits of the Petition, and it is the position of the Parties that this matter should be resolved in favor of the positions set forth in TWSI's Petition, consistent with the pre-filed testimony of the Parties. Consistent with agency practice, the Parties hereby jointly request that the entire official record in this Docket, including discovery, be made a part of the evidentiary record.

With the foregoing in mind, unless otherwise requested by the Commission, the Parties hereby waive both opening statements and cross-examination of witnesses by the Parties. TWSI Witness, Matthew Nicks, and Consumer Advocate Witness, Alex Bradley, will provide summaries

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<sup>1</sup> TWSI will not be submitting rebuttal testimony in light of the testimony of Mr. Bradley stating that TWSI had addressed the concerns of the Consumer Advocate that prompted its intervention into the Docket.

of pre-filed testimony and are available for questions by TPUC Commissioners or TPUC Staff at the Hearing scheduled for May 20, 2019.

As required, an original of this filing, along with four hard copies will follow. Should you have any questions concerning this filing, or additional information, please do not hesitate to contact me.

Sincerely,



Karen H. Stachowski  
Assistant Attorney General

cc: Jeff Ridsen