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March 22, 2019

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Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

In Re: Petition of Cartwright Creek, LLC to Amend Service Territory to Include the
Wilson Parcel and Garrett Parcel for the Troubadour Development in Williamson
County
Docket No: 19-00042


Dear Sir or Madam:

Please accept for filing the above-captioned petition to amend the service area of
Cartwright Creek, LLC to include two, immediately adjacent areas.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:


Henry Walker

HW/dbi
Attachment

111398-401001
483 8-9900-9422.1

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

IN RE:)
)
PETITION OF CARTWRIGHT CREEK, LLC)
TO AMEND SERVICE TERRITORY TO)
INCLUDE THE WILSON PARCEL AND)
GARRETT PARCEL FOR THE)
TROUBADOUR DEVELOPMENT IN)
WILLIAMSON COUNTY)

Docket No. 19-00042

**PETITION OF CARTWRIGHT CREEK, LLC
TO AMEND SERVICE TERRITORY TO INCLUDE
THE WILSON PARCEL AND GARRETT PARCEL FOR THE
TROUBADOUR DEVELOPMENT IN WILLIAMSON COUNTY**

Cartwright Creek, LLC (“Cartwright Creek” or “the Company”) petitions the Tennessee Public Utility Commission (“the Commission”) to amend the Company’s service area to include (2) proposed parcels called “Wilson Parcel” and “Garrett Parcel” for the existing Troubadour development (formerly The Hideaway at Arrington), located in Williamson County, Tennessee, directly adjacent to the east of the Company’s present service territory.

The Wilson & Garrett parcels will both be part of an existing residential development on Cox Road in Williamson County known as Troubadour. Exhibit 1 (attached) shows the location of the development and its proximity to the Company’s existing service area that includes Troubadour, Arrington Retreat, and new Hardeman Springs developments. Currently the Company has two hundred residential customers in this service area and will have over seven hundred customers in this service area when the three developments are fully built. The Wilson and Garrett parcels will add twenty houses with initial construction expected to begin in 2019. Cartwright Creek has been a regulated provider of wastewater services in Williamson County since 2004. The Company currently has two service areas with approximately 750 existing residential and 42 commercial customers. The Company’s contact information is on file at the

Commission. As explained in the attached testimony of Company manager Mr. Bruce Meyer (Exhibit 2), the Company has the managerial, technical and financial ability to provide service to the Troubadour development.

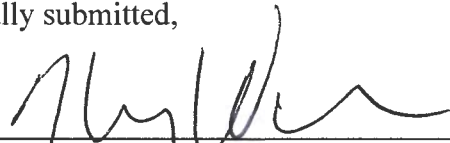
Cartwright Creek's financial viability has been recently reviewed by the Commission in Docket 16-00127, a "Staff assisted" rate case. Order issued January 10, 2017. As a result of that case, the Company's financial situation is now steadily improving and the addition of new customers in the Troubadour project that includes the Wilson and Garrett Parcels will further strengthen the Company's position. The developer of the Troubadour will bear all expenses for the engineering and construction of a collection system which will then be deeded to Cartwright Creek. The developer has also agreed to pay for the costs of this proceeding.

Wastewater service to the Wilson and Garret parcels will be provided through grinder pumps at each home and a low-pressure force main system sending effluent to the existing waste water treatment system. Cartwright Creek currently owns and operates similar wastewater treatment systems at both Arrington Retreat and Troubadour and employs a full-time, licensed wastewater operator to maintain those systems. As the developments continue to add homes and customers, additional staff will be hired. Cartwright Creek also maintains an office and shop at the Troubadour treatment facility, directly across the street from the Wilson property. As a result, Cartwright Creek can serve the Wilson and Garrett parcels without a significant increase in resources while collecting tap fees from the new houses in Wilson Parcel that will be placed into an escrow account and used to maintain and improve Cartwright Creek's facilities in other areas.

Cartwright Creek has the technical, managerial and financial capabilities to provide wastewater service to this area, as requested by the developer. The Company therefore asks that the Commission amend the Company's service area to include these two additional parcels.

Respectfully submitted,

By: _____



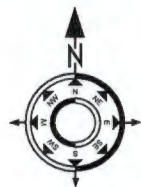
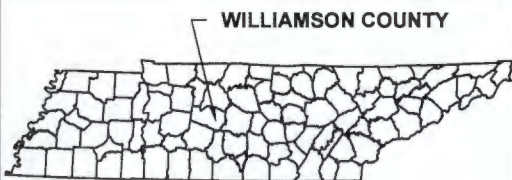
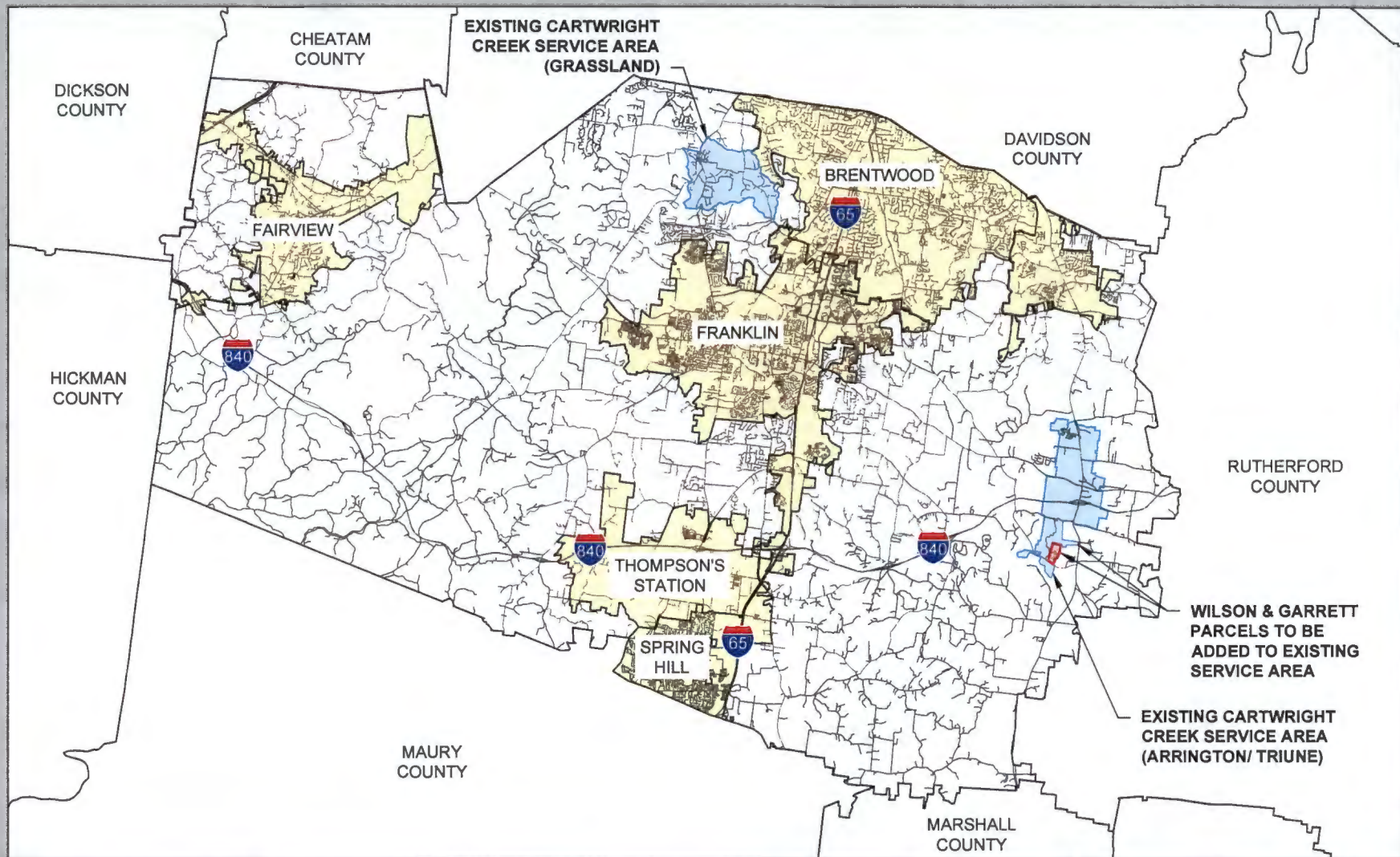
Henry Walker (B.P.R. No. 000272)
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203
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Email: hwalker@babbc.com

Attorneys for Cartwright Creek, LLC

Exhibit 1

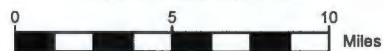
MAPS SHOWING LOCATION OF CARTWRIGHT CREEK'S EXISTING SERVICE AREA
AND LOCATION OF PROPOSED SPANTOWN DEVELOPMENT.

See attached.



PROPOSED SERVICE AREA MAP

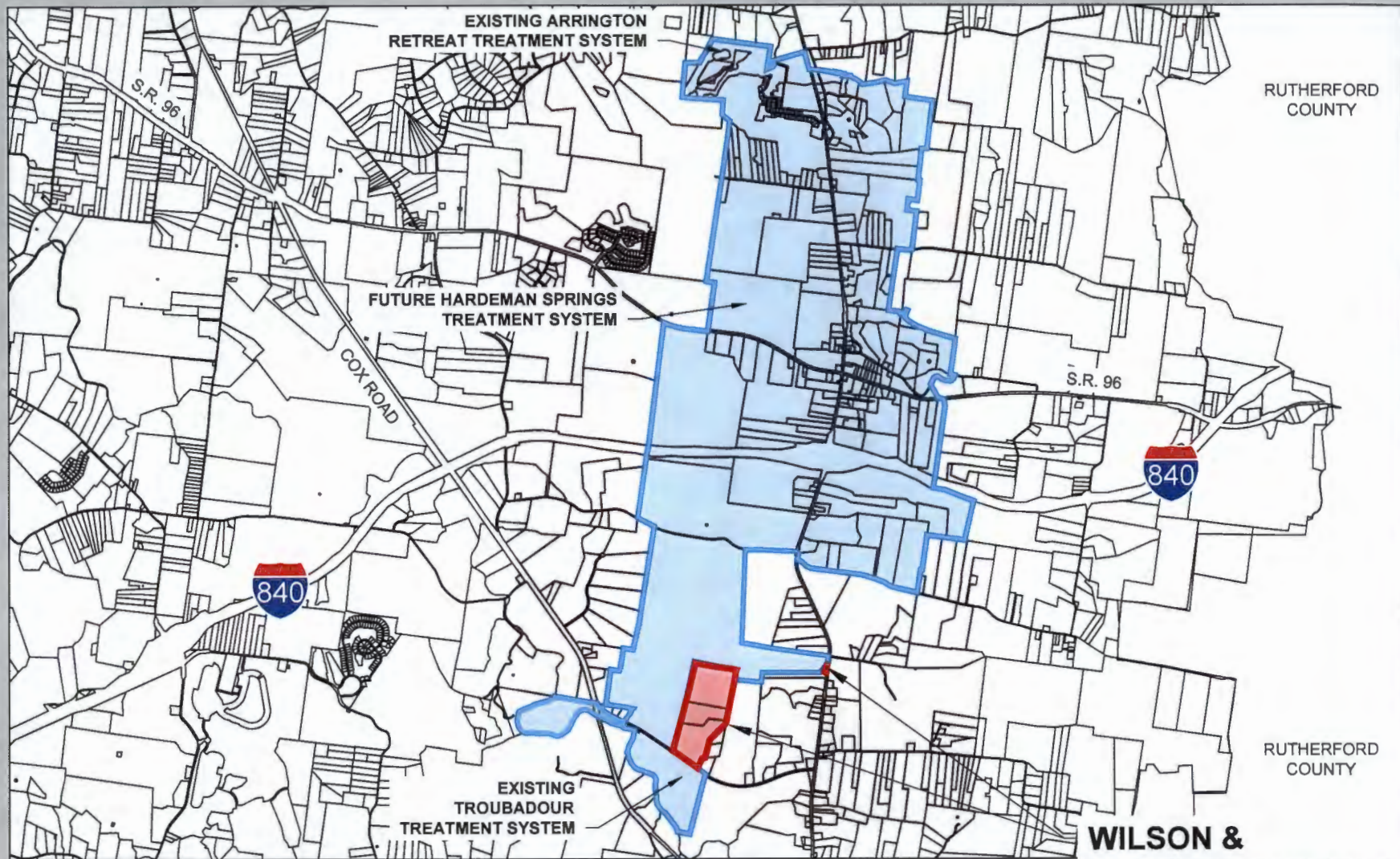
DECEMBER, 2018



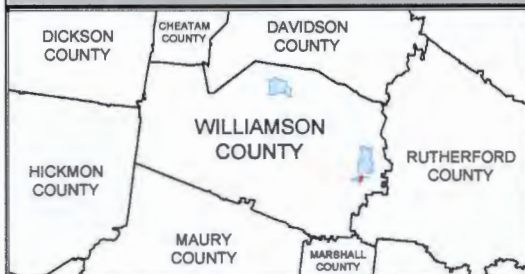
REVISIONS

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Contact: BRUCE MEYER
Phone: 615-281-8600
Email: bmeyer@sheafferwws.com



WILSON & GARRETT PARCELS



PROPOSED SERVICE AREA MAP (ENLARGED VIEW)

DECEMBER, 2018



REVISIONS

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| Contact: | BRUCE MEYER |
| Phone: | 615-281-8600 |
| Email: | bmeyer@sheafferwws.com |

Exhibit 2

PRE-FILED TESTIMONY OF MR. BRUCE MEYER

See attached.

**DIRECT TESTIMONY
of
BRUCE MEYER**

ON BEHALF OF CARTWRIGHT CREEK, LLC

March 21, 2019

Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION FOR THE RECORD.

A1. My name is Bruce Meyer and my business address is 6545 Cox Road, College Grove, TN 37046.

Q2. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A2. I am employed by Sheaffer Wastewater Solutions, LLC as Operations Manager.

Q3. HOW LONG HAVE YOU BEEN EMPLOYED BY SHEAFFER WASTEWATER SOLUTIONS?

A3. I have been employed by Sheaffer Wastewater Solutions (“Sheaffer”) for approximately seventeen years.

Q4. WHAT IS YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE?

A4. I have a Bachelor’s and Master’s Degree in Environmental Engineering for the University of Illinois, Chicago and the Illinois Institute of Technology, respectively. I have over 35 years of experience in various roles in the environmental industry. I currently hold a Professional Engineering license in Tennessee and have State of Tennessee Biological Natural Systems and Collection System II wastewater operator’s licenses.

Q5. WHAT ARE YOUR RESPONSIBILITIES AS THE OPERATIONS MANAGER FOR CARTWRIGHT CREEK, LLC?

A5. I am responsible for the day-to-day operation, engineering and permitting for Cartwright Creek, LLC (“Cartwright Creek”).

Q6. PLEASE DESCRIBE THE CARTWRIGHT CREEK SERVICE AREA.

A6. Cartwright Creek currently provides service to the Grassland's area in Williamson County and to the Arrington Retreat and Troubadour (formerly Hideaway) subdivisions in the Arrington/Triune area in Williamson County. The wastewater treatment system for another development that Cartwright Creek will serve, Hardeman Springs, is complete awaiting final approvals. The existing service areas and treatment sites are shown in the map on Exhibit A. The existing service area in the Arrington/Triune area was approved by the Tennessee Regulatory Authority in Docket Nos. 04-00358 and 07-00180.

Q7. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A7. The purpose of this testimony is to describe the proposed additions to Cartwright Creek's service territory and the capability of Cartwright Creek to properly serve them.

Q8. PLEASE DESCRIBE THE PROPOSED WILSON PARCEL DEVELOPMENT.

A8. The proposed Wilson Parcel will add residential development consisting of 20 homes on approximately 110 acres. It will be developed in two phases. It will be located approximately 1 mile west of Nolensville Road (Horton Highway) on Cox Road in Williamson County. Exhibit 1 shows the Wilson Parcel development location and proximity to Cartwright Creek's existing operations.

Q9. WHAT TYPE OF WASTEWATER COLLECTION AND WASTEWATER TREATMENT IS PROPOSED TO PROVIDE SEWER SERVICE?

A9. The collection system will be a low-pressure force main system, with grinder pumps at every home. The pumps will discharge to common low-pressure collection lines that will convey the wastewater to the existing Hideaway Treatment system owned by Cartwright Creek on Cox Road. The existing wastewater treatment system, an aerated lagoon

system, currently has capacity to treat the wastewater from the Wilson and Garrett properties. Additionally, plans are underway for expansion of the existing treatment system to accommodate additional homes at Troubadour development. The treated effluent will continue to be disinfected and land applied through subsurface drip irrigation. There are hundreds of similar collection and on-site treatment systems successfully treating wastewater across Tennessee in this manner.

Q10. WHAT IS THE CURRENT STATUS OF THE WILSON PARCEL DEVELOPMENT?

A10. The civil engineering design of the development is underway. The design includes the wastewater collection system. Construction activity will not commence until Williamson County and TDEC approval is granted to the overall development. The County and State permitting and approval process will continue through this year with site construction in late 2019.

Q11. PLEASE DESCRIBE THE PROPOSED GARRETT PARCEL.

A11. The Garrett parcel is an approximate 0.2 acre parcel along Nolensville Road that is adjacent to existing land owned by the developer of the Troubadour development currently within Cartwright Creek's service territory. It is unlikely, due to its size, that there will be construction on this parcel. However, the developer is requesting adding this parcel to the service territory so that all the land in the Development is within Cartwright Creek's service territory.

Q12. WHAT IS THE CURRENT PERMIT STATUS OF THE WASTEWATER TREATMENT SYSTEM SERVICE THE WILSON PROPERTY?

A12. The wastewater collection and treatment systems for the existing Troubadour development have been approved via a State Operating Permit (SOP). The existing

wastewater treatment system will be expanded to accommodate all the homes in the full development. Design and permitting for this expansion is underway.

Q13. DOES CARTWRIGHT CREEK HAVE THE MANAGERIAL AND TECHNICAL ABILITY TO OPERATE AND MAINTAIN THE WILSON PARCEL DEVELOPMENT'S WASTEWATER TREATMENT SYSTEM?

A13. Yes. The Wilson and Garrett Parcels addition to the Development's collection and treatment system fits well into Cartwright Creek's existing operations in the Arrington/Triune area, where there are two existing wastewater collection and treatment systems and an upcoming system owned and operated by Cartwright Creek. We currently have about 200 customers at these developments and at full build-out will have over 700 customers. Cartwright Creek has a full-time, licensed wastewater operator and an office/shop at the existing Hideaway treatment facility, across the street from the Wilson Parcel development. His duties include the operation of the wastewater treatment systems at the Arrington Retreat and Troubadour developments. When required, Cartwright Creek's other wastewater operators assist the Hideaway operator. Due to the existing operations, Cartwright Creek has the equipment and tools required for the regular maintenance and operation of the system. Cartwright Creeks also has established relationships with several qualified contractors to address regular and emergency maintenance needs.

Q14. HOW WILL THE CONSTRUCTION OF THE PROPOSED COLLECTION SYSTEM AT THE WILSON PARCEL DEVELOPMENT BE MANAGED AND FUNDED?

A14. The developer will bear all expense for the engineering and construction of the collection system. Cartwright Creek will review and approve the design and will field inspect and

approve the construction. Upon completion and passing final inspection, the collection system will become the responsibility of Cartwright Creek, LLC for ownership and operation.

Q15. WHAT RATES AND CHARGES WILL BE USED FOR THE WILSON PARCEL DEVELOPMENT?

A15. The units on the Wilson Parcel will be part of the Troubadour (Hideaway) development, which will be charged the Commission's tariffed rates for that development.

Q16. YOU DESCRIBED THE COLLECTION SYSTEM IN A PREVIOUS ANSWER. HOW WILL THE GRINDER PUMPS AT EACH HOME BE MAINTAINED?

A16. The Tennessee Department of Environment and Conservation (TDEC) requires a wastewater system of this type to be owned by the utility to ensure that it is properly installed and maintained. Therefore, Cartwright Creek will own and maintain the system components at each customer's home. Maintenance will be done by qualified contractors under Cartwright Creek's direction and the homeowner will pay the contractor's bill.

Q17. WHY DOES CARTWRIGHT CREEK WANT TO SERVE THIS NEW DEVELOPMENT AND WHAT BENEFIT IS IT TO THE EXISTING SEWER CUSTOMERS?

A17. Cartwright Creek wants to serve the Wilson and Garrett Parcels because an increase in the customer base helps the financial picture for the utility. Its proximity to existing operations means it can be served with a relatively few new additional resources. And finally, the tap fees from each home will be escrowed and used, with TPUC approval, to improve Cartwright Creek's facilities.

Q18. DOES CARTWRIGHT CREEK HAVE THE FINANCIAL RESOURCES TO PROVIDE SERVICE TO THE WILSON PARCEL DEVELOPMENT?

A18. Yes. Cartwright Creek's financial capability was presented and reviewed the TPUC staff extensively during the work for the 2016 joint rate case in Docket No. 16-00127. The rates and charges approved in that case helped the financial picture of the Company. Additional customers and tap fees will continue to improve the utility's long-term financial situation.

Q19. WILL THE COMPANY ABIDE BY THE ORDERS AND RULES OF THE COMMISSION?

A19. Yes.

Q20. DOES THIS COMPLETE YOUR TESTIMONY?

A20. Yes, it does.

Exhibit 3

LETTER FROM DEVELOPER OF WILSON PARCEL

See attached.

December 5, 2018

Mr. Bruce Meyer
Cartwright Creek, LLC
1551 Thompson's Station Road West
Thompson's Station, TN 37179

RE: Expansion of Cartwright Creek Service District

Dear Mr. Meyer

I am writing you to request wastewater service at our +/- 110 acre project along Cox Road in Arrington, Tennessee, commonly known as the "Wilson Property."

We would like to initiate proceedings to include this project into Cartwright Creek's service area. We are anticipating developing approximately 22 large acreage sites with a limited commercial component.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas R. Fous', with a stylized, sweeping flourish extending to the right.

Thomas R. Fous
Project President
Troubadour