

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF CARTWRIGHT CREEK,)
LLC TO AMEND SERVICE) DOCKET NO. 19-00042
TERRITORY TO INCLUDE THE)
WILSON PARCEL AND GARRETT)
PARCEL FOR THE TROUBADOUR)
DEVELOPMENT IN WILLIAMSON)
COUNTY)

**CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST
TO CARTWRIGHT CREEK, LLC**

To: Cartwright Creek, LLC
C/O Henry Walker
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203
hwalker@babco.com

This Second Discovery Request is hereby served upon Cartwright Creek, LLC (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, War Memorial Building, 301 6th Avenue North, Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 2:00 p.m. (CDT), June 14, 2019.

PRELIMINARY MATTERS AND DEFINITIONS

These Second Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Discovery Request to Cartwright Creek, LLC*, sent to the Company on May 24, 2019, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

- 2-1. Refer to the Company's Response to the Consumer Advocate's Request No. 1-3. The Company stated that the "Wilson parcel will have contributed capital in the form of underground collection system piping estimated at \$180,000." However, in the *Hideaway Wastewater Treatment Plant, Phase II Expansion, Preliminary Design Report* (Design Report)¹, Appendix E, identifies new equipment as part of the system expansion. For convenience, a copy of Appendix E is provided in this Request. In Appendix E's schematic, expansion equipment includes the following: (1) new influent screen channel in existing preanoxic mix tank; (2) new pumps for existing PS-C; (3) new basswood reactor #1 (anoxic); (4) new basswood reactor #2 (aerobic); (5) new basswood reactor #2 (aerobic); (6) new UV; and (7) new drip filed pumps. Provide responses to the following:
- a. Are the expansion plans submitted and approved by the Tennessee Department of Environment and Conservation the same as Appendix E? If not, provide a copy of the approved expansion plans.
 - b. For the new equipment necessary and approved for the Phase II expansion of this system, identify the cost of each piece of equipment that will comprise the contributed capital amount.

¹ A copy of the Design Report was attached to the Consumer Advocate's First Discovery Request as Exhibit CA-1.

RESPONSE:

RESPECTFULLY SUBMITTED,



KAREN H. STACHOWSKI (BPR No. 019607)

Assistant Attorney General

VANCE L. BROEMEL (BPR No. 011421)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Henry Walker
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203
Ph: 615-252-2363
hwalker@babco.com

This the 7th day of June, 2019.



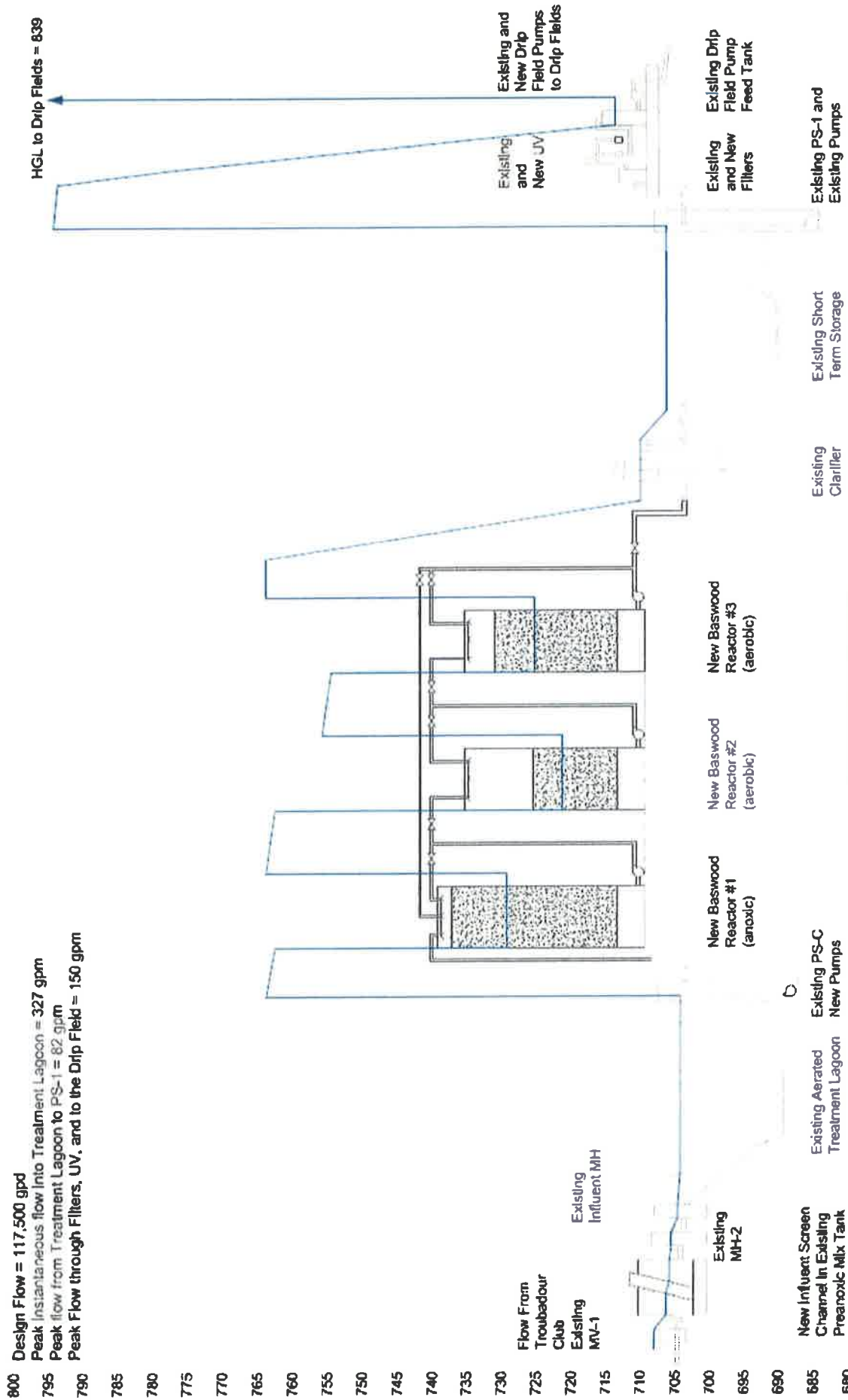
KAREN H. STACHOWSKI

Infilco Design Group, LLC
Hidesaway WWTP Preliminary Design Report
December 19, 2018

APPENDIX E

PROPOSED PRELIMINARY PLANS

800 Design Flow = 117,500 gpd
 795 Peak Instantaneous flow Into Treatment Lagoon = 327 gpm
 790 Peak flow from Treatment Lagoon to PS-1 = 82 gpm
 785 Peak Flow through Filters, UV, and to the Drip Field = 150 gpm



Proposed Hydraulic Profile
 NTS - Horizontal
 As Shown - Vertical



Proposed Site Plan
Scale 1" = 40'



Treatment System Enlarged Plan

Scale 1" = 20'