

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	)	

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CARTWRIGHT CREEK'S RESPONSES TO  
CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST

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**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)<sup>1</sup>, 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.

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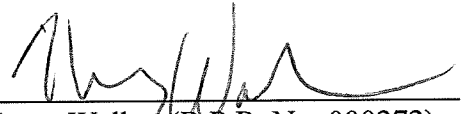
<sup>1</sup> A copy of the Design Report was attached to the Consumer Advocate's First Discovery Request as Exhibit CA-1.

- 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.

**RESPONSE:**

- a. *Yes.*
- b. *See attached estimates of construction costs. Exhibit 2-1(b).*

Respectfully submitted,

By: 

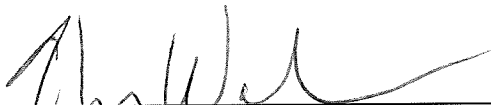
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Attorneys for Cartwright Creek, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of June, 2019, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

Karen Stachowski, Asst. Atty. Gen.  
Financial Division, Consumer Advocate Unit  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207

  
\_\_\_\_\_  
HENRY WALKER

## **Exhibit 2-1(b)**

Discovery Land Company  
Hideaway WWTP Phase II Expansion  
Opinion of Probable Construction Cost

Project Component	Quantity	Installed Unit Cost	Unit	Installed Costs
	Alt #4 - Lagoon + Baswood AIMS System			Alt #4 - Lagoon + Baswood AIMS System
Sitework				
Soil Excavation	200	10	cy	\$ 2,000
Concrete Apron	40	750	cy	\$ 30,000
Fencing	170	20	LF	\$ 4,000
Gravel Roadway	670	15	sy	\$ 11,000
4ft Dia Manholes (aeration valving)	2	3000	e	\$ 6,000
CIP Concrete				
Pump, Blower Screen Building Pad	34	750	cy	\$ 26,000
Odor Control Pad	6	750	cy	\$ 5,000
Intermediate Wall in old PreAnoxic Tank	3	1000	cy	\$ 3,000
Screen Channel in old PreAnoxic Tank	10	1000	cy	\$ 10,000
Baswood Reactor Pads	51	750	cy	\$ 39,000
Sludge Dewatering Building Pad	31	1000	cy	\$ 31,000
Sludge Dewatering Building Pad	31	750	cy	\$ 24,000
Steel				
old PreAnoxic tank cover	1	9600	EA	\$ 10,000
Sludge Building	440	150	sf	\$ 66,000
Control Building Expansion	570	150	sf	\$ 86,000
Pump/Blower Building	770	150	sf	\$ 116,000
				\$ -
Equipment				\$ -
PS-C Pumps to Smaller Baswood System after Lagoon	2	25000	EA	\$ 50,000
Odor Control System	1	42000	EA	\$ 42,000
Influent Screen - Installed	1	227500	EA	\$ 228,000
AIMS System - Baswood downstream of treatment lagoon	1	1408000	LS	\$ 1,408,000
Media Deck, Media installations	1	25000	LS	\$ 25,000
Odor Control System installations	1	15000	LS	\$ 15,000
Baswood Pump Skid, Blower Skid & Mixer/Aerator Installation	1	20000	LS	\$ 20,000
Dome Access Door Adder	3	2000	ea	\$ 6,000
UV disinfection reactor	1	57500	EA	\$ 58,000
Turbo Filter	1	42900	EA	\$ 43,000
Effluent Pump to Remote Drip Field	1	60800	EA	\$ 61,000
Sludge Dewatering Box	1	48000	EA	\$ 48,000
Polymer Feed System, Piping, etc	1	14000	EA	\$ 14,000
Piping & Valving				
3" PVC	225	15	LF	\$ 4,000
4" PVC	250	15	LF	\$ 4,000
6" PVC	350	30	LF	\$ 11,000
8" SS aeration piping	140	160	LF	\$ 23,000
10" SS aeration piping	60	200	LF	\$ 12,000
6" PVC odor control duct	90	60	LF	\$ 6,000

10" PVC odor control duct	150	100	LF	\$	15,000
6" PVC Ball Valve	6	2240	LF	\$	14,000
12" PVC Butterfly Valve - Odor Control	4	3080	ea	\$	13,000
12" SS Butterfly Valve - Aeration	2	6000	ea	\$	12,000
4" PVC Check Valves	2	2100	EA	\$	5,000
4" PVC Full Port Ball Valves	8	2100	EA	\$	17,000
Insulation and Heat Tracing	200	30	EA	\$	6,000
6" Magnetic Flow Meter	2	7000	EA	\$	14,000
6" Piping to Remote Drip Field from Harlan Rd	2800	40	LF	\$	112,000
3" Piping to from Remote Drip Field to WWTP	2800	25	LF	\$	70,000
Remote Drip Field Flush Return Pump Station	1	56000	LF	\$	56,000
Bore FM, electrical under Railroad	1	100000	LS	\$	100,000
Subsurface Drip Irrigation System - remotete field	6.33	40000	acres	\$	254,000
Existing Zone 1 Modification (required for sludge truck turning)	0.10	40000	acres	\$	4,000
Electrical and I&C	15.0%		%	\$	397,000
SCADA Imprpvements	1	250000	%	\$	250,000
HVAC/Plumbing	2.3%		%	\$	89,000
General Requirements	12%			\$	298,000
Subtotal Construction without Contingency				\$	4,273,000
Contingency and Cost Items Not Priced	15%			\$	430,000
<b>Construction with Contingency</b>				\$	<b>4,703,000</b>