

May 1, 2019

Electronically Filed in TPUC Docket Room on May 1, 2019 at 10:03 a.m.

David Foster, Director Utilities Division  
Tennessee Public Utilities Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

**RE:** Docket No. 19-00043, *Petition of King 's Chapel Capacity, LLC to Amend Service Territory to Include the Hill Parcel and Roberts Parcel for the King's Chapel Development in Williamson County.*

Dear Mr. Foster:

The responses to the Commission staff's data request issued to me on behalf of Tennessee Wastewater Systems, Inc. ("TWWS") on April 24, 2019 in the above referenced matter are as follows:

1. Please state whether the Hill and Roberts Parcels are within service area granted to TWWS. If so, please specify and reference such authority.

**RESPONSE:** The Hill and Roberts Parcels are within the service area granted to Tennessee Wastewater Systems, Inc. in Docket No. 97-01393. The territory map filed with and approved by the Commission in the docket show these parcels are within the Company's certificated territory.

2. (a) If the Hill and Roberts Parcels are within TWWS' certificated service area, please state whether the Company is providing service within these two parcels.

**RESPONSE:** The Company offers service throughout the service territory and is willing and able to provide it to anyone who requests it. Presently the Company is not providing service within these two parcels as service has not yet been requested, though it has the ability and willingness to do so.

(b) If TWWS is not serving these parcels, please state whether the Company has the requisite facilities in place to provide sewer service to these areas.

**RESPONSE:** TWWS is constructing a regional plant to provide service to two subdivisions on Cox Road as well as the eastern portion of the Company's Milcrofton territory, which includes these two parcels. The regional plant will have sufficient capacity to serve the Hill and Roberts parcels. TDEC has issued TWWS a State Operating Permit for the operation of the facility.

(c) If TWWS is currently capable of serving these areas, identify all existing facilities that are in place, along with any additional infrastructure, that would be needed to provide service.

**RESPONSE:** TWWS has no existing facilities in place to provide service (nor does Kings Chapel Capacity, LLC, for that matter, as their existing system must be expanded to create the capacity necessary to provide service to these parcels), however the regional plant will break ground this summer and is scheduled to be completed within the calendar year. Service to the Hill and Roberts parcels will also require piping infrastructure to connect the parcels to the regional plant. Additional drip infrastructure will need to be installed for disposal.

(d) State whether TWWS has acquired the necessary easements and sufficient land and all other necessary local and state approvals to serve the Hill and Roberts Parcels.

**RESPONSE:** No, the developer has yet to discuss this project with TWWS to determine what is needed to provided service. However, any easements and land necessary to provide service can be acquired.

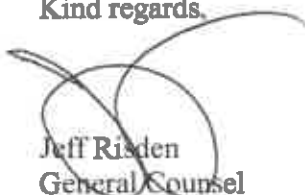
TWWS holds the CCN to provide service to the Hill and Roberts parcels. TWWS also has a State Operating Permit for the regional plant that will serve the parcels. No local approvals are necessary for TWWS to provide service, though the developer is required to show proof that a CCN has been granted to the wastewater provider before the project can be presented to the planning commission for county consideration and approvals.

3. In the event that the Hill and Roberts parcels are within TWWS' certificated service area and TWWS is not serving or is unable or unwilling to serve these two parcels, state whether the Company will relinquish the parcels.

**RESPONSE:** The Hill and Roberts parcels are within TWWS' certificated service area and the Company is able and willing to provide wastewater service to the parcels.

If the Commission has any further questions or I can be of further assistance, please do not hesitate to contact me.

Kind regards,



Jeff Riden  
General Counsel

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