

STATE OF TENNESSEE

Office of the Attorney General



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December 26, 2019

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

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

Dear Chairperson Morrison:

Since the submission of Kings Chapel Capacity, LLC's (Kings Chapel)¹ Petition in the above-referenced matter on March 29, 2019, King's Chapel and the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (Consumer Advocate) have been involved in cooperative discussions and have exchanged various information related to the Petition. With the submission of supplemental supporting documentation and discovery responses by Kings Chapel; the submission of Kings Chapel's Testimony of John Powell; and the submission of the Consumer Advocate's Testimony of Alex Bradley, the Parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer. Kings Chapel accepts the Consumer Advocate's recommendations and will not be filing rebuttal testimony in this Docket.

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, and the Parties' 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

¹ Since the filing of this Petition, the Commission has acknowledged a notification of a name change by Kings Chapel. Kings Chapel is now Superior Wastewater Systems, LLC. However, for purposes of this Docket, the Consumer Advocate will continue to refer to Kings Chapel. *Letter from David Foster*, Director of TPUC Utilities Division, to John Powell, Superior Wastewater Systems, LLC, TPUC Docket No. 19-00015 (June 28, 2019).

positions set forth in Kings Chapel'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. Kings Chapel Witness, John Powell, and the Consumer Advocate Witness, Alex Bradley, will provide summaries of pre-filed testimony and are available for questions by TPUC Commissioners or TPUC Staff at the Hearing.

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.

Respectfully,



Karen H. Stachowski
Assistant Attorney General

cc: Charles B. Welch, Jr., Esq.