

TENNESSEE PUBLIC UTILITY COMMISSION



502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Electronically Filed in TPUC Docket Room on January 8, 2019 at 3:01 p.m.

January 8, 2020

Mr. Henry Walker
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203

RE Docket No. 19-00049, *Petition of Cartwright Creek, LLC Requesting Approval of Proposed Capital Improvements.*

Dear Mr. Walker:

In order for the Commission to evaluate the above captioned docket, it is requested that your company provide answers to the attached Staff Data Request.

Pursuant to TRA Rule 1220-1-1-.03(4), submit either an electronic response along with an original and four (4) written copies or an original written response and thirteen (13) copies. Please note that the requisite number of written copies of all requested information should be provided to the Docket Manager no later than Friday, January 17, 2020, and electronic responses, if filed, must be in .pdf format. Should you have questions regarding the attached request, please contact me at (615) 770-6884.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Foster".

David Foster
Director, Utilities Division

C: Docket File
Tom Kolschowsky

Staff Data Request 1

1. Provide the latest monthly total escrow balance separated by (1) tap fees and (2) capital improvement surcharges.
2. Identify any amounts that shareholders are proposing to contribute to the repairs and upgrades needed at the Grasslands System.
3. Assuming the Commission approves the continuation of the \$7.50 monthly Capital Improvement Surcharge in Docket 19-00097, please discuss whether shareholders would be willing to fund the necessary repairs and upgrades upfront and then receive compensation via the monthly surcharge, including reasonable interest charges?
4. Discuss Cartwright Creek's attempts to secure a loan for the outstanding amount needed to complete repairs and upgrades needed at the Grasslands System.
5. Discuss in detail all repairs that have been made at the Grasslands System that have yet to be paid.
6. Discuss the repairs and upgrades the existing escrow funds will be used for and discuss the remaining repairs and upgrades that will be necessary, including amounts.
7. Assuming the Commission approves the continuation of the \$7.50 monthly Capital Improvement Surcharge, provide an anticipated timetable for completing repairs and upgrades at the Grasslands System.
8. Will future repairs be made at the Grasslands System prior to receiving funds via the Monthly Capital Surcharge (assuming it will be approved).
9. Provide copies of all Cartwright Creek's contracts with developers.