

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)	
)	
JOINT APPLICATION OF AQUA)	
UTILITIES COMPANY, LLC, AND)	DOCKET NO. 19-00062
LIMESTONE WATER UTILITY)	
OPERAITNG COMPANY FOR)	
AUTHORITY TO SELL OR TRANSFER)	
TITLE TO THE ASSETS, PROPERTY)	
AND REAL ESTATE OF A PUBLIC)	
UTILITY AND FOR A CERTIFICATE)	
OF CONVENIENCE AND NECESSITY)	

AQUA UTILITIES COMPANY, LLC'S SUPPLEMENTAL RESPONSE TO DATA
REQUEST

To: Karen H. Stachowski (BPR No. 019607)
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Vance L. Broemel (BPR No. 011421)
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I. General Objection

Whether or not separately set forth in response to each Request, Respondent makes the following General Objection to each and every Definition and Request in Consumer Advocate's Data Request.

1. Respondent objects generally to all Requests to the extent that any Request seeks information that is not proportional to the needs of this case or that is not relevant to proving one

or more of the parties' claims or defenses. Respondent objects on the grounds that said demands are overly broad, and would subject Respondent to undue annoyance, oppression, burden, and expense. Such information shall not be produced in response to the Request.

II. Responses

On February 27, 2020, the Consumer Advocate sent a follow up question to Aqua's Supplemental Responses to the Data Request. Counsel for Aqua Utilities responded on March 2, 2020. On March 6, 2020, the Consumer Advocate sent electronic mail correspondence requesting that Aqua file their response in this Docket.

The Consumer Advocate's follow up question is as follows:

1. The CA DR No. 1-25 asked "If applicable, provide a comprehensive discussion justifying the retention of these funds by Aqua Utilities." In Limestone Water's Response to CA No. 1-59, Limestone Water states it was in error when it did not carry over the CIAC currently on the books of Aqua Utilities.

The Consumer Advocate would like confirmation from Aqua Utilities that it agrees with Limestone Water's response to CA No. 1-59.

RESPONSE:

Aqua agrees with Limestone's answer to CA No. 1-59 but would point out that, although the account will be transferred, the balance in the account fluctuates based upon the amount collected and costs incurred for the maintenance and repair of the facilities.

Dated: March 10, 2020

Respectfully Submitted,



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*Attorneys for Joint Applicants Aqua Utilities
Company, Inc., and Limestone Water Utility
Operating Company, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing has been served via either U.S. Mail, postage prepaid, or electronically to the following this 10th day of March, 2020.

Vance Bromel
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Tyler A. Cosby