

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 )

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LIMESTONE WATER UTILITY OPERATING COMPANY'S RESPONSE TO THE  
CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST

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To: Karen H. Stachowski (BPR No. 019607)  
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**GENERAL OBJECTIONS**

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

1. Respondent objects to the extent that any Request seeks information or the production of documents protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity. Such information or documents shall not be produced in

response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege or right with respect to such documents or information or of any work product doctrine that may attach thereto.

2. Respondent objects to all Requests inclusive, to the extent they purport to enlarge, expand, or alter in any way the plain meaning and scope of any specific Request on the grounds that such enlargement, expansion, or alteration renders said Request vague, ambiguous, unintelligible, unduly broad, or uncertain.
3. Respondent objects to all Requests inclusive, to the extent they seek documents or information not currently in Respondent's possession, custody, or control, or refer to persons, entities, or events not known to Respondent on the grounds that such Requests seek to require more of Respondent than any obligation imposed by law, would subject Respondent to unreasonable and undue annoyance, oppression, burden, and expense, and would seek to impose upon Respondent an obligation to investigate or discover information or materials from third parties or services that are equally accessible to the Consumer Advocate.
4. Respondent objects generally to all Requests to the extent they seek to impose an obligation on Respondent to provide more information than required by the Tennessee Rules of Civil Procedure or any order in this matter.
5. Respondent objects generally to all Request to the extent that any Request seeks electronically-stored information that is not reasonably accessible to Respondent because of undue burden or cost, including but not limited to documents stored on systems for archival or disaster recovery purposes, data residing in hardware buffer memories, deleted files that have not been fully overwritten, and replica data resulting from automatic back-up functions.
6. 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.

7. Respondent objects to each Request to the extent that it attempts to include several separate Requests or discrete sub-parts within one purported Request. Respondent will not respond to any Request that, including discrete subparts, exceed the applicable limit under the Tennessee Rules of Civil Procedure or the Local Rules.

### **Responses to Second Set of Data Request**

- 2-1. Refer to Aqua Utilities' Responses to Consumer Advocate's (CA) Aqua Utilities DR Nos. 1-3 and 1-17. Also, refer to Limestone Water's Exhibit entitled "DR1-23." Aqua Utilities states that it never received information for a distribution map showing lines, line sizes, valves, blow-offs and hydrants for the Points of Pickwick Area. In Limestone Water's Exhibit DR1-23, the report does not address the lack of a distribution map for the water system. However, the report's *Wastewater Treatment Facility Understating* section states that the "current owner is making an effort to find design plans for the system layout and will provide plans that he acquires." Further, the report also states that smoke testing will "help with mapping the [wastewater] system for survey and GIS purposes." Respond to the following:

- a. Water System.

- i. If a current distribution map for all developments is not produced by the current owner, will the Company complete a distribution map to include all of the developments?
  - (1) If yes, provide an estimate of such a mapping project and who will be responsible for incurring such cost.
  - (2) If no, explain why the Company will not complete a distribution map that includes all of the developments.

**b. Wastewater System.**

- i. Will the Company conduct smoke testing for the entire wastewater system for all three developments?
  - (1) If yes, provide cost and time estimate of smoke testing the entire system.
  - (2) Who will be responsible for incurring such cost.
- ii. If a current distribution map for all developments is not produced by the current owner and smoke testing will not be conducted on the entire wastewater system, will the Company complete a distribution map to include all of the developments?
  - (1) If yes, provide cost and time estimates of such a mapping project and who will be responsible for incurring such cost.
  - (2) If no, explain why the Company will not complete a distribution map that includes all of the developments.

**RESPONSE:**

**a. Water System.**

i. Yes, to the best of its ability CSWR will produce a map of the distribution systems using data from surveys performed during our initial title work and other data collected during setup of the utilities in our maintenance management software. This sort of “forensic” mapping of a system can only establish the details of the system with limited accuracy. Located features will be accurately placed, and assumptions will be made to fill in the paths of linework.

(1) The estimate currently shows \$16,000 between GIS and Surveying cost, and the Company intends to capitalize these costs and include them in the rate base used to determine the revenue requirement in the first-rate case.

**b. Wastewater System.**

i. Yes, Smoke testing will be conducted for the entire system,

(1) Smoke Testing is estimated to cost \$15,000.

ii. Yes, to the best of its ability CSWR will produce a map of the collection systems using data

from surveys performed during our initial title work and other data collected during setup of the utilities in our maintenance management software. This sort of “forensic” mapping of a system can only establish the details of the system with limited accuracy. Located features will be accurately placed, and assumptions will be made to fill in the paths of linework. Smoke testing will also bring enhanced accuracy to these maps.

- (1) The estimate currently shows \$30,000 between GIS and Surveying cost, and Limestone intends to capitalize those costs and include them in the rate base used to determine the revenue requirement in the Company’s first-rate case.

2-2. Refer to Aqua Utilities’ Responses to CA Aqua Utilities DR Nos. 1-9 and 1-10; this Docket’s *Amended Joint Application*, Appendix A(e)(9); and Limestone Water’s Exhibit entitled “DR1-23.” In 2015, Aqua Utilities had 371 residential water customers and 301 residential wastewater customers. In its discovery responses, Aqua Utilities stated that it has 350 residential water and wastewater customers and 25 irrigation customers in its three development. Limestone’s report, Exhibit DR1-23, states there are 353 water and wastewater customers and 66 irrigation customers. The report also states that the “area is anticipating more growth.” So, it appears that there has been customer growth since the Staff Assisted Rate Case in 2015 and additional growth is expected. Yet, the Parties in their *Amended Joint Application* predict no customer growth during the first five years of operation. Explain why customer growth is not anticipated in the first five years of operation.

**RESPONSE:**

**CSWR has no accurate method to anticipate growth at this time. As more information becomes available, CSWR plans to update its growth projections if necessary.**

- 2-3. Refer to Aqua Utilities' Responses to CA Aqua Utilities DR Nos. 1-9 and 1-10 and Limestone Water's Exhibit entitled "DR1-23." Explain the discrepancy in the number of irrigation customers identified by Aqua Utilities in its response to discovery (25 customers) and the number of irrigation customers identified by Limestone's report, Exhibit DR1-23 (66 customers).

**RESPONSE:**

**The previous owner stated that there are currently 66 irrigation meters in the system and Limestone relied on those statements.**

- 2-4. Refer to Aqua Utilities' State Operating Permit SOP-92082 and Limestone Water's Exhibit entitled "DR1-23." The State Operating Permit SOP-92082 authorizes the operation of an "aerated lagoon with spray irrigation system to serve approximately 49 homes. The design capacity of the system is 0.1481 MGD." The design flow for the wastewater system is approximately 300 GPD per single family dwelling unit. However, in Exhibit DR1-23, the report states that there are currently 353 wastewater customers and "the facility currently appears to have excess capacity due to being predominantly second homes." Provide the following:

- a. What is the "design flow per single family dwelling unit" utilized by the Company in determining that the system has "excess capacity."
- b. The Company's numbers and calculation in determining the excess capacity of the system.
- c. It appears that both the Company and Aqua Utilities are relying on current and future residences being primarily used as secondary homes when determining required capacity. However, the character of the developments may change in the future resulting in an increase in full-time residents. If this occurs and the system's existing capacity is insufficient because the design flow of 300 GPD per single

family dwelling unit as set out in SOP-92082 was not followed, who will responsible for the capital expenditure to expand the system?

**RESPONSE:**

- a. 300 GPD was used in this estimate**
- b. Capacity is 148100 GPD ( $353 \times 300 = 105900 \text{ GPD} < 148100 \text{ GPD}$ )**
- c. The Company will be responsible for upgrades. Additionally, after taking over the system we will install flow metering, which will provide more accurate flow numbers, as well as an active measure of flow moving forward. This will provide a more exact estimate of excess capacity and show any change in the characterization of the community over time, as described in the question.**

2-5. Refer the Company's Exhibit entitled "DR1-23." In Exhibit DR1-23, the report states that there are currently 353 wastewater customers and "the facility currently appears to have excess capacity due to being predominantly second homes. Did the identified excess capacity, or unused capacity, within the wastewater system impact Limestone's (or any of its affiliates) analysis of an appropriate offer price? If yes, explain the impact. If no, explain why the excess capacity was not considered.

**RESPONSE:**

**As referenced in DR 1-7, while always trying to pay the lowest purchase price possible, CSWR typically uses the Net Book Value and appraisals to formulate an offer price. Due to the service area being a second home community, there do seem to be times when there is excess capacity. During peak usage, however, the system is operating at maximum capacity and therefore is not overbuilt. This capacity is in use and useful during peak usage and therefore, did not affect the offer price.**

2-6. Refer to Aqua Utilities' Response to CA's Aqua Utilities DR No. 1-4. The Commission rules require a "certification from a design engineer that the wastewater system was constructed in accordance with TDEC-approved construction plans and specifications" however, Aqua Utilities states that this certification is not in its possession. Respond to the following:

- a. Has the Company evaluated the Aqua Utilities wastewater system to determine if it is constructed in accordance with TDEC-approved construction plans and specifications?
- b. If the Company has conducted its own evaluation, provide all documents of this evaluation.
- c. If the Company has not conducted its own evaluation, will the Company conduct such an evaluation? If yes, when will it conduct the evaluation. If no, explain why such an evaluation will not be conducted.

**RESPONSE:**

The Company interprets 1220-04-13-.17(2) as applying to newly constructed systems where an applicant is seeking an initial CCN. Because this transaction involves a system that already is in operation under a CCN granted many years ago, Limestone does not believe that rule applies to this application. Subject to that qualification, the Company responds as follows:

- a. No, the Company has not yet evaluated the system to determine if it was constructed in accordance with TDEC-approved construction plans.
- b. See response to preceding question.
- c. Yes, this sort of evaluation will be completed, however it will likely be completed during an initial evaluation period following closing where the initial operational improvements are implemented and basic repairs are completed. It is difficult to accurately evaluate a system while it is being operated by a different company.



**During this initial period, a clearer picture of what the system is actually capable of will be established and said evaluation will be completed and documented.**

2-7. Refer to the Company's Response to CA DR Nos. 1-5(b) and 1-36. Respond to the following:

- a. The Company's Response to CA DR No.1-5(b) indicates the use of the four-factor Massachusetts Method for cost allocation, while the Company's Response to CA No. 1-36 refers to three factors and lists such factors. Confirm that the Massachusetts formula includes the listed three factors and is not a four-factor methodology. If this is not confirmed, identify the fourth factor used to compute the appropriate allocation factor.
- b. Provide a calculation of the factors based upon the existing retail service companies of CSWR based upon 2019 financial data.
- c. Confirm that the Company uses a simple average of the three individual factors to develop an overall allocation ratio. If this is not confirmed, explain how the Company arrives at the overall ratio.
- d. With respect to the reference to Direct Labor in Company's Response to CA DR No. 1-36, does this include contract labor?

**RESPONSE:**

- a) The Massachusetts method is a 3-factor calculation that includes gross property, plant, and equipment; direct labor expenses; and gross revenues.**
- b) Please see attachment "DR 2-7B Mass Method Calculations". This is the calculation based on 2019 actuals.**
- c) CSWR does use a simple average of the ratios.**
- d) Direct labor does include contract labor.**

2-8. Refer to the Company's Responses to CA DR Nos. 1-5 and 1-36. Provide the total CSWR costs incurred in 2019 that were (i) directly charged to affiliates and (ii) were allocated using the Massachusetts formula to affiliates.

**RESPONSE:**

**i) \$324,372**

**ii) CSWR did not record expense allocations via the Massachusetts method in 2019. Full implementation was executed on 1/1/2020**

2-9. Refer to the Company's Responses to CA DR Nos. 1-5 and 1-36. Identify the total 2019 CSWR costs by account or type of cost.

**RESPONSE:**

**As referenced in our response to DR 2-8, CSWR did not record expense allocations via the Massachusetts Method in 2019. The only cost allocated to CSWR operating companies was insurance expense.**

2-10. Refer to the Company's Response to CA DR Nos. 1-5 and 1-36. Identify the total 2019 costs direct charge/allocated by state in which CSWR operates (AR/KY/LA/MO).

**RESPONSE:**

**MO - \$218,664**

**KY - \$21,333**

**AR - \$84,375**

**LA – No costs were allocated to Louisiana in 2019, because the Company did not commence operations in that state until late December 2019.**

2-11. Refer to the Company's Response to CA DR No. 1-18. Identify the CFO of CSWR and provide a summary of his/her relevant work experience and educational background.

**RESPONSE:**

**Currently, CSWR is in the interviewing process to hire a CFO. Once this decision has been made, CSWR will provide their relevant work experience and educational background.**

2-12. Refer to "DR 1-26 Aqua Utilities Appraisal Report." The appraisal report states as follows (pdf page 46):

We have not been provided a current survey, title report, soils report, or environmental opinion. Further we have not been provided access or confirmation of the location or observation of any utility easements within the residential neighborhoods, which are gated subdivisions. The value as reported herein is predicated on the extraordinary assumption that: 1) there is no adverse title, soils or environmental conditions impacting the subject site; and 2) all stated assumptions relative to water and sewer easements are accurate as described herein. We have no(t) applied any hypothetical conditions. The use of extraordinary assumptions might have affected the assignment results. We recommend the Intended User obtain verification of each of the assumptions described herein by a qualified professional.

With respect to the passage above, indicate whether each of the following items identified in the first sentence have been obtained:

- a. Current Survey.
- b. Title Report.
- c. Soils Report.
- d. Environmental Opinion.

If such items identified in b – d above have been obtained, provide a copy.

**RESPONSE:**

**None of the items have been obtained at this time. CSWR is in the process of obtaining a current survey and title documents but does not plan to obtain a soils report or an environmental opinion at this time.**

2-13. Refer to the Company's Response to CA DR No. 1-28 (b), which provided forecasted Income Statements of Limestone and contains assumptions for utilities Limestone does not own and apparently omits information related to the pending Aqua transaction. Provide similar financial information forecasting operating results applicable to Aqua operations, but omitting information related to other entities.

**RESPONSE:**

**The company's response to DR 1-28(b) does include the pending Aqua transaction. The asterisked note referred to the systems besides Aqua Utilities included in the Pro Forma Income statement. Please see Attachment "DR 2-13 Aqua Pro Forma". This spreadsheet uses the same assumptions.**

2-14. Refer to Aqua Utilities' Response to CA's Aqua Utilities DR Nos. 1-9b and to Limestone Water's Exhibit entitled "DR1-23." Aqua Utilities state that the Points of Pickwick has 25 irrigation meters and doesn't mention irrigation meters at the other two developments, Northshore and the Preserve. In Limestone Water's Exhibit DR1-23, the report states there are 66 irrigation meters. Provide an explanation in the discrepancy of the irrigation meters identified.

**RESPONSE:**

**The previous owner stated that there are currently 66 irrigation meters in the system and the Company relied on that statement.**

2-15. Provide a copy of the audited 2018 financial statements for Central States Water.

**RESPONSE:**

**See attachment "DR 2-15 2018 Financials" filed under seal.**

2-16. Provide a copy of the unaudited 2019 financial states for Central States Water.

**RESPONSE:**

**See attachment "DR 2-16 2019 Financials" filed under seal.**

2-17. Refer to the Company's Response to CA DR No. 1-52. Provide estimates of anticipated future rate increases necessary to provide Limestone a reasonable return. Indicate the timing and magnitude of such anticipated increases.

**RESPONSE:**

**Preliminary rate increase estimates for Limestone Water as a whole (including the systems referenced in the response to DR 1-28) can be found in Limestone's response to DR 1-28. Actual future rate increases will be determined by the commission after considering all relevant factors affecting rates, including a fair return on investment devoted to the public service.**

2-18. Refer to the Company's Response to CA DR No. 1-39(c). Provide detail of what is included in the anticipated capital expenditure of \$48,000?

**RESPONSE:**

**The improvements planned in this capital expenditure include housing for equipment, fencing repairs, installation of a flowmeter, and spray irrigation system repairs. Over time there will be additional capital improvements including installation of remote monitoring on lift stations.**

2-19. Refer to the Company's Response to the Company's Exhibit entitled "DR1-23." What is the estimate cost for radio read meters for the water system?

**RESPONSE:**

**The total cost is \$381,625 according to current capital estimate done by 21 Design Group. This exceeds the entire capital upgrade budget for both the water and wastewater system and therefore will not be pursued at this time.**

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 10<sup>th</sup> day of March, 2020.

Vance Bromel  
Karen H. Stachowski  
Consumer Protection and Advocate Division  
Office of the Attorney General  
P.O. Box 20207  
Nashville, TN 37202

A handwritten signature in cursive script, reading "Tyler A. Cosby", written over a horizontal line.

Tyler A. Cosby

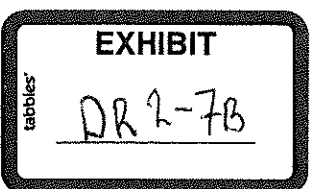
**CSWR, LLC**  
Cost Allocation  
(Massachusetts Method)

**Premise:** The Mass Method is employed when no direct cost allocation is readily available to transfer costs to the UOCs.  
To arrive at an expense ratio, the weighted average of three factors (Utility Plant In Service, Revenue and Direct Labor) is calculated.

**Example:** As of and for the year ended: December 31, 2019

Utility Plant In Service	Amount	Percent	Revenue	Amount	Percent
Hillcrest	1,186,273	6.75%	Hillcrest	436,375	15.67%
Raccoon Creek	1,789,895	10.18%	Raccoon Creek	543,540	19.51%
Indian Hills	1,876,915	10.68%	Indian Hills	537,851	19.31%
Elm Hills	2,122,956	12.08%	Elm Hills	137,393	4.93%
Confluence Rivers	1,876,956	10.68%	Confluence Rivers	309,946	11.13%
Hayden's Place	218,137	1.24%	Hayden's Place	65,503	2.35%
St. Joseph's Glen	311,108	1.77%	St. Joseph's Glen	127,007	4.56%
Sebastian Lake	242,886	1.38%	Sebastian Lake	114,496	4.11%
Eagle Ridge	309,417	1.76%	Eagle Ridge	156,167	5.61%
Oak Hill	328,957	1.87%	Oak Hill	117,095	4.20%
Flushing Meadows	354,215	2.02%	Flushing Meadows	79,239	2.84%
Magnolia	6,514,894	37.07%	Magnolia	4,000	0.14%
Bluegrass	441,359	2.51%	Bluegrass	156,950	5.63%
	17,573,968	100.00%		2,785,562	100.00%

Direct Labor	Amount	Percent	Allocated - Overhead Burden	Amount	Percent
Hillcrest	33,677	2.76%	Hillcrest	499,405	8.39%
Raccoon Creek	66,585	5.46%	Raccoon Creek	697,354	11.72%
Indian Hills	63,376	5.19%	Indian Hills	697,908	11.73%
Elm Hills	119,276	9.78%	Elm Hills	531,383	8.93%
Confluence Rivers	505,806	41.45%	Confluence Rivers	1,254,897	21.09%
Hayden's Place	25,922	2.12%	Hayden's Place	113,411	1.91%
St. Joseph's Glen	37,691	3.09%	St. Joseph's Glen	186,837	3.14%
Sebastian Lake	46,195	3.79%	Sebastian Lake	184,053	3.09%
Eagle Ridge	108,757	8.91%	Eagle Ridge	322,948	5.43%
Oak Hill	52,214	4.28%	Oak Hill	205,404	3.45%
Flushing Meadows	27,505	2.25%	Flushing Meadows	141,127	2.37%
Magnolia	4,229	0.35%	Magnolia	745,094	12.52%
Bluegrass	128,921	10.57%	Bluegrass	371,180	6.24%
	1,220,154	100.00%	<b>Total Allocated Overhead</b>	5,951,000	100.00%





Effective Date  
Average Tariff

Year 1

Year 2

Year 3

\$ 74.25

**Revenues and Expenses**

**Current P&L**

**CSWR Rates  
at Acquisition**

**CSWR Step Rate**

**CSWR Final Rate**

**Total Operating Revenues**

\$ 254,232

\$ 254,232

\$ 611,460

\$ 670,031

**Operating Expenses**

\$ -

\$ -

\$ 67,680

\$ 67,680

Salaries & Wages \$ -

\$ -

\$ -

\$ 22,560

\$ 22,560

Employee Pensions and Benefits \$ -

\$ -

\$ -

\$ 120,000

\$ 120,000

Purchased Water/Sewer Transfer \$ -

\$ -

\$ 120,000

\$ 35,500

\$ 35,500

Plant Operations Expenses \$ 187,801

\$ 187,801

\$ 18,048

\$ 18,048

\$ 18,048

Billing Expenses \$ -

\$ -

\$ -

\$ 2,256

\$ 2,256

Supplies and Expenses \$ -

\$ -

\$ -

\$ 2,256

\$ 2,256

Transportation Expenses \$ -

\$ -

\$ -

\$ 3,384

\$ 3,384

Rent and Utility Expense \$ -

\$ -

\$ -

\$ 40,000

\$ 40,000

Insurance Expense \$ -

\$ -

\$ -

\$ 5,640

\$ 5,640

Outside Services Employed (i.e., IT, Legal, Actg, etc.) \$ -

\$ -

\$ -

\$ -

\$ -

Regulatory Commission Expenses \$ -

\$ -

\$ -

\$ 2,256

\$ 2,256

Uncollectible Expenses \$ -

\$ -

\$ -

\$ 3,384

\$ 3,384

Other Expenses \$ -

\$ -

\$ -

\$ 3,600

\$ 3,600

Communications (cell phones, internet, etc.) \$ -

\$ -

\$ -

\$ 3,384

\$ 3,384

Bank Expense \$ -

\$ -

\$ -

\$ 5,000

\$ 5,000

Travel & Entertainment Expense \$ -

\$ -

\$ -

\$ 276,512

\$ 61,006

Existing Staff Comp - 3 months \$ -

\$ -

\$ -

\$ -

\$ -

Audit Expense \$ -

\$ -

\$ -

\$ 30,250

\$ 36,008

Depreciation Expense \$ 83,578

\$ 83,578

\$ -

\$ 90,000

\$ 107,131

Amortization of Contributions in Aid of Construction \$ (12,606)

\$ (12,606)

\$ -

\$ 110,000

\$ 130,938

Amortization Expense \$ -

\$ -

\$ -

\$ -

\$ -

Tax Expenses \$ 16,435

\$ 16,435

\$ -

\$ -

\$ -

Interest Expense \$ 835

\$ 835

\$ -

\$ -

\$ -

Net Income \$ (21,811)

\$ (21,811)

\$ 32,084

\$ 110,000

\$ 130,938

**Total Operating Expenses**

\$ 187,801

\$ 222,148

\$ 334,948

\$ 334,948

**EBITDA**

\$ 66,431

\$ 32,084

\$ 276,512

\$ 335,083

**Total Operating Expenses**

\$ 187,801

\$ 222,148

\$ 334,948

\$ 334,948

**EBITDA**

\$ 66,431

\$ 32,084

\$ 276,512

\$ 335,083

**Total Operating Expenses**

\$ 187,801

\$ 222,148

\$ 334,948

\$ 334,948

**EBITDA**

\$ 66,431

\$ 32,084

\$ 276,512

\$ 335,083

**Total Operating Expenses**

\$ 187,801

\$ 222,148

\$ 334,948

\$ 334,948

EXHIBIT

5219991

D2 2-13

IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE

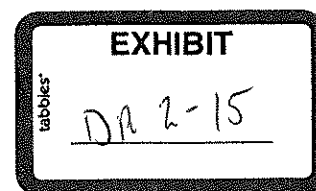
IN RE:	)	
	)	
JOINT APPLICATION OF AQUA	)	
UTILITIES COMPANY, LLC, AND	)	DOCKET NO. 19-00062
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LIMESTONE WATER UTILITY OPERATING COMPANY'S RESPONSE TO THE  
CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST

---

**Confidential and  
Propriety Exhibit.**



**IN RE:**

**JOINT APPLICATION OF AQUA  
UTILITIES COMPANY, LLC, AND  
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**

**LIMESTONE WATER UTILITY OPERATING COMPANY'S RESPONSE TO THE  
CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST**

**Confidential and  
Propriety Exhibit.**

