

**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)	
OPERATING 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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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 March 12, 2020 the Consumer Advocate sent two follow up questions to Aqua's Supplemental Responses to the Data Request.

The Consumer Advocate's follow up questions are as follows:

1. **Aqua Utilities Response to DR#2.** The response by Aqua Utilities for 2-4, it references the Purchase and Sale Agreement that was filed with the Application/Petition regarding the list of assets to be transferred. However, the Purchase and Sale Agreement didn't contain any of the Exhibits referenced within the Agreement. More specifically, Exhibits A & B are descriptions of immovable and movable property that are the subject of the Agreement. The Consumer Advocate requested copies of these exhibits in its previous discovery request to Limestone Water, No. 1-42b. Limestone Water's response was that such exhibits do not exist. Is there a document of the list of assets to be transferred? If yes, can Aqua Utilities provide a copy.

RESPONSE:

Pursuant to the terms of the Purchase and Sale Agreement, Exhibits A, B, C, D, E, F, G, and H do not currently exist but will be prepared in the ordinary course in conjunction with the closing of the transaction contemplated in this proceeding.

2. **Aqua Utilities Supplemental Response.** The Company stated that "... the account fluctuates based upon the amount collected and costs incurred for the maintenance and repair of

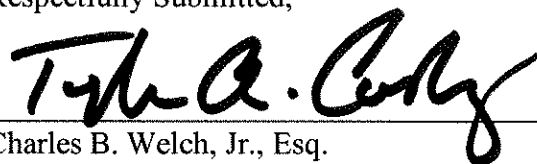
the facilities.” Can you provide the basis, and support, for Company’s statement that CIAC may be reduced for maintenance and repair of facilities?

RESPONSE:

The balances will not be impacted as a result of the proposed transaction. The amounts of the CIAC are listed in the Annual Reports.

Dated: March 16, 2020

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Tyler A. Cosby", is written over a horizontal line.

Charles B. Welch, Jr., Esq.

Tyler A. Cosby, Esq.

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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 16th 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 black ink, reading "Tyler A. Cosby", written over a horizontal line.

Tyler A. Cosby