

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 FIRSTSET OF DATA REQUEST

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INSTRUCTIONS

Please note, as used herein:

(a) The word "document" shall be construed broadly to include any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts and both sides thereof.

(b) The word "or" means "and/or;" the word "and" means "and/or."

(c) The word “identify” means, with respect to any statements, documents, acts, practices, occurrences, events, devices, schemes, meetings, conferences, communications, or utterances, the date thereof, the party or parties causing, issuing or communicating such statement, document, communication or utterance, the parties to whom and in whose presence such statements, documents, communication or utterance was given or transmitted, the party who participated in, caused or had knowledge of any act, practice, occurrence, event, device, scheme, meeting or conference, and whether any of the foregoing was in writing, in which event describe the terms (or attach a copy of any document to the answers to these data request), or oral, in which event state the substance thereof.

(d) The word “identify” or “identity” means, with respect to any person, the name, residential and business address, residential and business telephone numbers, place of employment, title or position with such employer.

(e) The term “Aqua” refers to the Joint Applicant Aqua Utilities Company, LLC herein.

(f) The terms “Limestone or Limestone Water” refer to the Joint Applicant Limestone Water Utility Operating Company.

(g) The words “you” or “your” or “CAD” mean the Consumer Advocate Division of the Tennessee Attorney General’s Office.

(h) The word “transaction” refers to any the proposed transaction in the above captioned Docket.

DATA REQUEST

1. Reference is made on page 3, line 7 of Mr. Dittmore’s Direct Testimony dated March 31, 2020, in this matter, wherein Mr. Dittmore references a decision by the TPUC in Docket No. 20-00025. Please state, with specificity, the relevant issues and provisions of the order TPUC decided on the issue referenced in Mr. Dittmore’s testimony. Additionally, please produce any relevant provisions of that proceeding, that the CAD has in its possession, custody, or control, upon which

you relied.

2. Mr. Dittenmore's Direct Testimony dated March 31, 2020, in this matter, contains a statement on page 3, lines 9-12, that states "However, it does not specifically identify the criteria which should be used to determine whether the proposed transaction is in the public interest. I believe the following criteria should be used in the evaluation of this transaction and similarly situated transactions..." Please provide, with specificity, what information, including any documents, Mr. Dittenmore used to form his opinion.

3. Question 9 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, in this matter contains specific recommended conditions necessary for this transaction to move forward. Please provide with specificity, what information, including any documents, Mr. Dittenmore used to form the rational to impose the conditions identified on page 4, lines 12 through 20 and page 5, lines 1 through 17, as to Aqua Utilities.

4. On page 6, line 6 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore states that he does not believe the adoption of the conditions identified in Answer 9 represent roadblocks to closing the transaction. Please provide, with specificity, what information was used as a basis to form this opinion., as to Aqua Utilities.

5. On page 15, Answer 29 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore provides 4 factors that should be considered when determining the portion of the Gain on the Sale should be assigned to ratepayers. Please provide what information was used to form the basis of this opinion.

6. On page 3, line 1 of Mr. Bradley's Direct Testimony dated March 31, 2020, Mr. Bradley identifies the amount of CIAC balance for Aqua as \$322,438 for the 12 months ending May 31, 2016. Please provide in detail all current and historical information with regard to the origin and

calculation of this amount.

7. On page 3, line 18 of Mr. Bradley's Direct Testimony dated March 31, 2020, Mr. Bradley quotes Pre-filed Direct Testimony of Joe Shirely in TPUC Docket No. 15-00044. Please produce any relevant portions of that proceeding, that the CAD has in its possession, custody, or control, upon which you relied.

8. On page 4, line 21 of Mr. Bradley's Direct Testimony dated March 31, 2020, Mr. Bradley references TPUC Docket No. 06-000187. Please produce any relevant portions of that proceeding, that the CAD has in its possession, custody, or control, upon which you relied.

9. On page 3, Question 10 of Mr. Bradley's Direct Testimony dated March 31, 2020, Mr. Bradley is asked to give his opinion regarding the Current CIAC Balance. Please provide what information was relied upon, including the historical information regarding the origin and current calculation of the amount, in forming that opinion.

10. Please provide any and all information the CAD has received from TDEC regarding Aqua Utility Company as a result of a public records request.

11. Produce all hearing exhibits and other documents that you plan to introduce, use, or reference at the hearing on the merits in this matter.

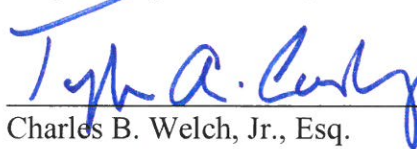
12. Produce all documents that have been referenced or relied upon by each of your witnesses.

13. Produce all work-papers and calculations generated by each of your witnesses in this matter in Excel working format with numbers, and formulas.

14. Please identify the names, business addresses, and telephone numbers of each individual that assisted in the preparation of these responses.

Dated: April 7, 2020

Respectfully Submitted,



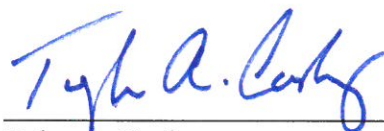
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*Attorneys for Joint Applicants Aqua Utilities
Company, Inc., and Limestone Water Utility
Operating Company, LLC*

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 7th day of April, 2020.

Vance Bromel
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Tyler A. Cosby