

**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)	

**LIMESTONE WATER UTILITY OPERATING COMPANY'S FIRST SET 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. On page 9, lines 17 and 18 of Mr. Dittenmore’s Direct Testimony dated March 31, 2020 states “The Company (Limestone) claims there is no Acquisition Premium in this case however their view of the definition of Acquisition Premium is not accurate.” Please identify what information, including any documents, that was used as the basis to form this opinion.

2. On page 22, lines 5 and 6 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore states "I believe rates should increase no more than \$10/month per year." Please identify what information, including any documents, was used to form this opinion.

3. On page 2, line 6 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore states "I have submitted testimony in a number of TPUC Dockets, since joining the Attorney General's Office." Please provide the Docket number of each Docket in which Mr. Dittenmore has provided testimony and provide any relevant portions of the proceedings, that the CAD has in its possession, custody, or control, upon which you relied.

4. 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 that should be assigned to ratepayers. Please provide the basis for this opinion, including any documents, and provide each Docket Number that these factors have been used in making a determination.

5. On page 9, line 5 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore states "I believe the portion of the purchase price related to land is excessive." Please identify and produce any documents and any information used to form this opinion.

6. On page 4, Answer 8 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore states: "I believe there are ratepayer benefits as well as risks associated with this transaction which I will identify in my testimony." Please identify and provide what information was used, including any documents, to form this opinion.

7. On page 10, Answer 16 of Mr. Dittenmore's Direct Testimony dated March 31, 2020, Mr. Dittenmore states "Exhibit DND-2 contains the Balance Sheet of Aqua. Exhibit DND-3 provides a very rough estimate of the Acquisition Premium based upon Aqua's 2018 Balance Sheet

balances. This amount translates to an approximate Acquisition Premium of \$571 Thousand.” Please provide a detailed description, including any documents and calculations, of how Mr. Dittenmore arrived at this specific amount.

8. On page 13, Answer 22 of Mr. Dittenmore’s Direct Testimony dated March 31, 2020, Mr. Dittenmore provides the estimated impact to customers. Please provide the specific calculations used to determine the estimated impact.

9. Please provide the TPUC Docket Number for each Docket in which the CAD has intervened within the last 2 years.

10. Please provide a detailed description of each instance in which the CAD has made a positive recommendation contingent upon the adoption of the CAD’s conditions in the last 2 years.

11. Please provide a detailed description of each instance in which the CAD has recommended that the Commission place a cap on rate increases in the last 2 years.

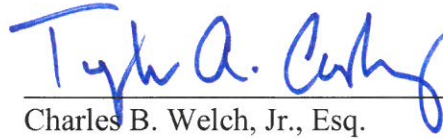
12. Please identify each TPUC Docket in which the CAD has recommended a company or utility not seek an increase in rates until the company or utility has operated the system for at least 1 year.

13. On page 14, Answer 28 of Mr. Dittenmore’s Direct Testimony dated March 31, 2020, Mr. Dittenmore provides his rationale for attributing a portion of all of the gain on the sale to Utility Ratepayers. Please provide all information relied upon, including any documents, in forming this rationale.

14. On page 17, Answer 32 of Mr. Dittenmore’s Direct Testimony dated March 31, 2020, Mr. Dittenmore references TPUC Docket No. 92-1398 and TPUC Docket No. U-84-7308. Please produce the relevant portions of these proceedings, upon which you relied.

Dated: April 7, 2020

Respectfully Submitted,



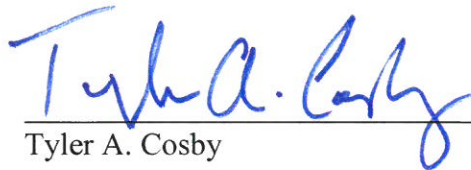
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*Attorneys for Joint Applicants Aqua Utilities
Company, Inc., and Limestone Water Utility
Operating Company, LLC*

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