

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	)	

JOINT APPLICANTS' RESPONSE TO CONSUMER ADVOCATE'S MOTION IN LIMINE

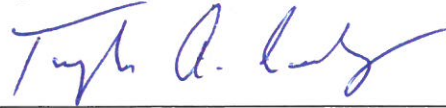
The Joint Applicants, Aqua Utilities Company LLC ("Aqua") and Limestone Water Utility Operating Company ("Limestone") by and through their undersigned counsel, respectfully submit this Response to Consumer Advocate's Motion in Limine. The items/documents cited by the CAD were not filed into the Docket. The items/documents at issue here are possible exhibits the Joint Applicants might use during the Hearing. Pursuant to the Hearing Officer's request, the Joint Applicants shared these items with the CAD via the cloud share by the August 5, 2020 deadline.

The CAD does not cite a single ground on which this Motion can be granted. For example, the CAD makes no suggestion that the items/documents are irrelevant or that the items/documents are in any way prejudicial. The only ground the CAD cites is "No prior reference to these documents was made by any witness of the Joint Applicants prior to August 5, 2020." That certainly is not a ground to grant the Motion.

Therefore, the Joint Applicants respectfully request that this Motion be denied, and for such other and further relief as the Hearing Officer deems just and proper.

Dated: August 7, 2020

Respectfully Submitted,



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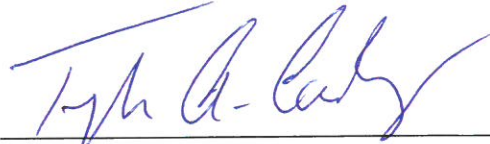
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*Attorneys for Joint Applicants Aqua Utilities
Company, Inc., and Limestone Water Utility
Operating Company, LLC*

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 August, 2020.

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



Tyler A. Cosby