


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)	

CONSUMER ADVOCATE'S MOTION FOR LEAVE TO ISSUE
MORE THAN FORTY DISCOVERY REQUESTS

The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (Consumer Advocate), pursuant to TPUC Rule 1220-1-2-.11(5)(a), hereby submits this Motion requesting permission to issue more than forty discovery requests to Limestone Water Utility Operating Company, LLC, Central States Water, Inc. and Aqua Utilities Company, LLC. Pursuant to TPUC Rule 1220-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests and the discovery requests themselves. A copy of the proposed discovery is filed herewith.

RESPECTFULLY SUBMITTED,


KAREN H. STACHOWSKI (BPR #019607)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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Limestone Water Utility Operating
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This the 29th day of January, 2020.



KAREN H. STACHOWSKI