

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)
OPERAITNG COMPANY FOR)
AUTHORITY TO SEEL 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 SECOND DISCOVERY REQUEST
TO AQUA UTILITIES COMPANY, LLC

To: Charles B. Welch, Jr., Esq.	Aqua Utilities Company, Inc.
Tyler A. Cosby, Esq.	c/o Montana Land Company, LLC
Farris Bobango PLC	Attn: James E. Clausel
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Limestone Water Utility Operating Company, LLC
c/o Josiah Cox
Central States Water Resources, Inc.
500 Northwest Plaza Drive, Suite 500
St. Ann, MO 63074-2220
Telephone: (314) 736-4672
Email: jcox@cswrgroup.com

This Second Discovery Request is hereby served upon Cartwright Creek, LLC (Company) pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office

of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, War Memorial Building, 301 6th Avenue North, Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 2:00 p.m. (CDT), March 10, 2019.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Discovery Request to Aqua Utilities* sent to the Company on January 29, 2020, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

The Consumer Advocate acknowledges that significant portions of its Second Discovery Requests are redacted. The amount of redaction is unusual for the Consumer Advocate, but it is due to both Petitioners' designation of the entirety of their responses as confidential and proprietary. The Consumer Advocate does not agree with the entirety of the Petitioners' responses being designated as confidential and proprietary; however, the Consumer Advocate has abided by the terms and conditions of the Protective Order issued by the Hearing Officer on September 25, 2019.

2-1. Refer to *Tenn. Comp. R. & Regs. 1220-04-13-.17(2)(e)*8. Provide a copy of Aqua Utilities' current tariff.

RESPONSE:

2-2. Refer to Aqua Utilities' Responses to Consumer Advocate's DR Nos. 1-3 and 1-17.¹ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RESPONSE:

2-3. Refer to Aqua Utilities' Responses to Consumer Advocate's DR No. 1-17. It appears that the Company's Response was incomplete because it ended at the word "without." Provide the Company's complete response to DR No. 1-17.

RESPONSE:

2-4. Refer to Aqua Utilities' Responses to Consumer Advocate's DR No. 1-20 [REDACTED]

[REDACTED] Provide a complete listing of all assets to be transferred to Limestone upon the completion of the transaction.

RESPONSE:

¹ Unless otherwise identified, references to Consumer Advocate's discovery request are specific to the requests posed to Aqua Utilities.

RESPECTFULLY SUBMITTED,

Karen H Stachowski

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***Consumer Advocate's Second Discovery Request to Aqua Utilities Company, LLC
TPUC Docket No. 19-00062***

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:

Charles B. Welch, Jr., Esq.
Tyler A. Cosby, Esq.
Farris Bobango PLC
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Aqua Utilities Company, Inc.
c/o Montana Land Company, LLC
Attn: James E. Clausel
408 Main Street
Savannah, TN 38372
Telephone: (731) 925-4834
Email: jamesclausel@yahoo.com

Limestone Water Utility Operating Company, LLC
c/o Josiah Cox
Central States Water Resources, Inc.
500 Northwest Plaza Drive, Suite 500
St. Ann, MO 63074-2220
Telephone: (314) 736-4672
Email: jcox@cswrgroup.com

This the 25 day of February, 2020.

Karen H Stachowski
KAREN H. STACHOWSKI