

November 4, 2022

**VIA ELECTRONIC FILING**

Hon. Herb Hilliard, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

Electronically Filed In TPUC Docket Room  
on November 4, 2022 at 9:00 a.m.

**RE: *Expedited Petition of Sontara Old Hickory, Inc. for Approval of the Acquisition of the System and for the Issuance of a Certificate of Public Convenience and Necessity, TPUC Docket No. 19-00071***

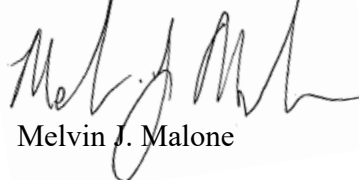
Dear Chairman Hilliard:

In an abundance of caution, we are submitting this letter as a follow-up to the Tennessee Public Utility Commission's ("TPUC" or "Commission") November 22, 2019, *Order Approving Asset Purchase Agreement and Granting Certificate of Convenience and Necessity* in TPUC Docket No. 19-00071. By its plain language, TPUC Rule 1220-04-13-.09(7) appears to only apply to wastewater systems that are to be constructed subsequent to the Commission's granting of a Certificate of Convenience and Necessity ("CCN"), as opposed to the circumstances presented in Docket No. 19-00071. Nonetheless, even though no construction was undertaken to build a new water and wastewater system with respect to our CCN, in the unlikely event the rule is determined to apply to Docket No. 19-00071, Sontara Old Hickory, Inc., is hereby complying with TPUC Rule 1220-04-13-.09(7) by notifying the Commission in writing within three (3) years from the date of the written order granting our CCN that the water and wastewater system acquired in Docket No. 91-00071 is fully operational and remains in service.

If you have any questions or require additional information, please let me know.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

cc: Peter Straub  
Vance Broemel, Consumer Advocate Division  
Karen Stachowski, Consumer Advocate Division