### Electronically Filed in TPUC Docket Room on December 23, 2019 at 2:11 p.m.



Henry Walker Direct: 615.252.2363 Fax: 615.252.6363 hwalker@babc.com

December 23, 2019

### VIA ELECTRONIC FILING

Tennessee Public Utility Commission 502 Deaderick Street, 4<sup>th</sup> Floor Nashville, TN 37243

Re:

Petition of Cartwright Creek, LLC to Extend Capital Improvement Surcharge

Staff Data Request No. 1 Docket No. 19-00097

Please accept for filing the attached answers to the Staff Data Request No. 1 in the above-captioned docket.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

Henry Walker

HW/dbi Attachments

#### Question:

1. Please explain the difference between the 893 customers reported on the March 2019 quarterly report and the 835 customers that were billed the \$7.50 surcharge. Each quarterly report and quarterly billing reveals similar information. Does Cartwright [Creek] bill the surcharge to all customers and, if not, please explain.?

#### Response:

Cartwright Creek applies the Customer Improvement Surcharge to all of its customers.

The 893 Customers reported on Page 3 of the March 2019 Quarterly Report represents the <u>average</u> number of customers for the entire quarter. Some of these customers who enter or leave the system in a particular month can be counted twice – once for the previous customer and once for the new customer resulting in slightly higher customer counts.

The 835 Customers reported on Page 4 of the March 2019 Quarterly Report represents the actual number of customers for March 2019 that the Capital Improvement Surcharge was applied to.

### Question:

2. Please provide the amounts by system and by date (Arrington Retreat, Hideaway, Troubadour, Hardeman Springs) since 2015 that Cartwright Creek has collected in "Owner Maintenance Fees" (fee paid by owner of each lot). Also, include the amount of any owner credits or refunds for these systems.

### Response:

See Exhibit A.

### Question:

3. Please provide the amount of tap fees by month since January 2010 that has been collected to date separated by all locations, including Grasslands, Arrington Retreat/Waterbridge, Hardeman Springs, Stillwater, Hideaway and Troubadour. Provide this information by system and also identify the number of lots added per quarter.

### Response:

See Exhibit B. We do not track the historical number of lots per quarter.

#### Question:

4. Your annual reports for 2016, 2017 and 2018 show the following new customer connections:

	Arrington	Hideaway	Grasslands		
2016	39	6	3		
2017	13	25	0		
2018	8	13	0		

Also, your annual report shows the following amounts for tap fees:

2016: \$65,000 2017: \$22,500 2018: \$37,500

Please reconcile the number of new connections with the tariff tap fee rate of \$5,000 per new connection for these years. Also provide an explanation for any uncollected tap fees required by tariff.

#### Response:

Please see TPUC Attachment 1-4a for a detailed listing from our ledger of the tap fees charged by location for 2015 through 2019. Not every new connection has been charged a tap fee, depending upon Developer agreements.

### Question:

5. Provide a two-year forecast for the number of lots to be added at each location and provide the anticipated tap fees to be collected.

### **Response:**

The number of lots to be added is highly dependent on factors not in Cartwright Creek's control. We do not have a forecast on taps or fees to be collected.

### Question:

6. Provide a two-year forecast for any developer subsidy/maintenance fees or fees of any sort to be collected for the expanded/upgraded developments.

### Response:

See response to question 5.

### Question:

7. If the Petition is approved, prove anticipated completion times for major repairs for the next two years, including a description of the repairs and estimated repair costs.

### Response:

Major repairs will be planned as the funds from tap fees and the capital surcharge accrue. The amount from tap fees at this time is uncertain.

# Exhibit A

CARTWRIGHT CREEK LLC
OWNER MAINTENANCE FEE COLLECTED

HARDEMAN SPRINGS

	Arrington Retreat	Retreat				TROUBAD	TROUBADOUR/HIDEAWAY	AWAY		
	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
								-g-98-a		
Arrington Property Holdings, LLC					THE RESIDENCE OF THE PARTY OF T		0	112,787	115,812	103,711
ARH Models II					Managaran and an alternative dispersion of the particular and the same		998	832		
Aspen Construction LLC					-			6,396	4,285	621
Britt At Arrington LLC							4,690	7,196	3,904	931
Celebration Homes				A CONTRACTOR AND ADDRESS OF THE PARTY ADDRESS OF THE PARTY AND ADDRESS			5,773	5,904	4,034	740
Hideaway Investments							14,937	10,268	1,417	
Legend Homes LLC	The state of the s						3,969	3,343	2,259	
MRSF1, LLC / Investor Nation LLC	-	-	The second of th					1,674	1,008	
The Ernst Group LLC	A CONTRACTOR OF THE PROPERTY O		Policy and the standard programme and the standard policy and the standard pol	Contract of the Contract of th			2,309	4,257	5,227	2,948
TN Valley Homes				The contract of the contract o	a majora di danamana di magana di manda di paga pagi da man		3,969	6,748	1,629	853
Weekley Homes LLC							2,886	3,637	3,413	543
Wiesner Custom Homes	and the same and t		To the state of th				3,324	4,524	1,707	
Woodridge Homes			· Company of the comp		The last Committee of the Committee of t	and the second s	3,464	3,637	2,818	
Drees Premier Homes	2,381	4,899	4,641	6,685	1,271					233
Meritage Homes of Tennessee, Inc	1,546	5,757	2,532	5,967	2,321					
PH Investments, LLC	227	94	276							
Turnberry Homes LLC @ ARRINGTON RETREAT	THE REAL PROPERTY AND ADDRESS OF THE PARTY AND	COLUMN TO THE PERSON OF T	4,973	14,586	14,255					
Turnberry Homes LLC @ HARDEMAN SPRINGS	A COMMENT OF THE PARTY OF THE P									
Stonebridge Homes @ HARDEMAN SPRINGS										
			,				9	,	1	4
OWNER MAINTENANCE FEE COLLECTED	4,154	10,747	12,421	27,238	17,846		46,188	1/1,203	14/,513	110,58
year 1 credit to Arrington National Holdings								-50,151	And the second s	
TOTAL								221,354	erantistic P	

247	2015	2016	2017	2018	2019
247					
247					
247 247 11,543 494					
247 247 1,543 494	THE REAL PROPERTY AND PERSONS ASSESSED.	A CONTRACTOR OF THE PROPERTY O			Accession and the second secon
247	dan jermijo vermejo i v Bakandi mojihravi i	The state of the s			
247 247 11,543 494	Andreas and the second			The same of the sa	
1,543	de destination de la company d	The calculation is a construction of the calculation of the calculatio	NAME OF THE OWNER	CONTRACTOR OF THE PARTY OF THE	247
1,543					
1,543	ta e e alconomie minimo miser e manimo de la como de manimo de la como de la		TO THE PERSON AND THE		247
1,543	ments of comments of contrast				
1,543 494					
1,543 494					
1,543 494					
1,543 494					
1,543 494					
1,543 494 2,530					
1,543					
2,530					1,543
2,530					494
2,530					
					2,530

### Exhibit B

TAPS

		2015	2016	2017	2018	2019	
ARRINGTON RETREAT GRASSLANDS		30,000 5,000	15,000	22,500	32,500	7,500	
HIDEAWAY/TROUBADOUR HARDEMAND SPRINGS	****	and the second s	50,000		5,000	40,000	
	TOTAL	35,000	65,000	22,500	37,500	47,500	207,500