

From: [David Foster](#)
To: [Ectory R. Lawless](#)
Subject: FW: 21-00001 Data Request
Date: Wednesday, July 14, 2021 12:28:09 PM

Tory,

Please file this data request sent via email to Mr. John Powell in Docket No. 21-00001.

David

From: David Foster
Sent: Wednesday, July 14, 2021 12:25 PM
To: John Powell <john-powell@comcast.net>
Cc: Chuck Welch <cwelch@farris-law.com>; Patsy Fulton <Patsy.Fulton@tn.gov>
Subject: 21-00001 Data Request

Mr. Powell,

It is requested that you provide the following clarifications/additional information regarding your previous responses to Staff's Data Request #3.

1 The Wastewater Facility Construction Agreement's signature page remains to be between JP Construction Communities, LLC and McCanless and Company. The response to Staff Data Request item 3-2e said it had been changed from JP Construction Communities, LLC to the correct name, John Powell Construction. It is requested that a signature be submitted with the all correct entity names.

2. The Wastewater Treatment Facility Service Agreement ("Agreement") now has the name McCanless and Company, Inc. on the signature page. The previous contract, as well as page 1 of the Agreement and the Secretary of State's website, has the Company name of McCanless and Company with no listing for McCanless and Company, Inc. Please clarify whether McCanless and Company, Inc. and McCanless and Company are the same entity? If not, please explain.

3. The map provided in Exhibit B is not readable. The map should clearly identify the location of the new treatment system (SOP-20021), the location of the existing treatment system (SOP-03032) and the two subdivisions (Kings Chapel and The Homes at Mulberry Meadows). Street names should also be included between the two locations.

4. Staff Data Request item 3-3e states: The tariffed annual access fee revenue of \$84 for each unsold lot or per lot should be clearly stated. The response to 3-3e states to see Section 4 (Fees for customer sewage and wastewater treatment) on page 3 of Attachment 3-1a. The statement in the Agreement states that McCanless and Company will be liable for an annual service of Eighty-Four dollars (\$84) for all lots that remain unsold. Please confirm that that McCanless and Company will be liable for \$84 for each lot unsold. As an example, if ten homes are built then McCanless and Company would owe the Utility a total \$1,428 (\$84 per lot x 17 unsold lots). Of course, the total number of unsold lots could increase if more lots are approved by Williamson County.

It is requested that this information be provided as soon as possible in order to schedule the CCN petition for the next Commission Conference on August 9, 2021.

David Foster
Director of Utilities Division
Tennessee Public Utility Commission
(615) 770-684