

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

APPLICATION OF LIMESTONE WATER)	
UTILITY OPERATION COMPANY, LLC)	
FOR AUTHORITY TO SELL OR TRANSFER)	DOCKET NO. 21-00053
TITLE TO THE ASSETS, PROPERTY, AND)	
REAL ESTATE OF A PUBLIC UTILITY,)	
CARTWRIGHT CREEK, L.L.C., AND FOR)	
A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

**SUPERIOR WASTEWATER SYSTEMS'
PETITION TO INTERVENE**

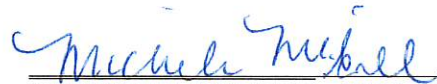
Superior Wastewater Systems, LLC ("SWS"), petitions the Tennessee Public Utility Commission ("TPUC"), pursuant to Tennessee Code Annotated § 4-5-310(a), to allow SWS to intervene as a matter of right in the above-captioned Petition of Limestone Water Utility Operating Company, LLC ("Limestone") to operate in the same certificated but unserved area of Planned Growth Area 5 ("PGA5") in Williamson County. In support of this Petition, SWS submits that:

1. SWS presently has a CCN to serve an area in Williamson County adjacent to PGA5.
2. SWS is currently planning to seek authority from the TPUC to provide wastewater services to unserved areas in Williamson County and other locations throughout Tennessee.
3. Among other service territories, TPUC had previously granted to Cartwright Creek, LLC ("Cartwright Creek") a certificate of convenience

and necessity to provide service to PGA5 in Docket No. 04-000358. At this time, a great deal of PGA5 remains unserved by any wastewater utility.

4. On January 24, 2022, TPUC issued an order in this docket transferring “all assets, property and real estate” used by Cartwright Creek to provide wastewater service and granting Limestone a certificate of convenience and necessity.
5. On September 26, 2022, the Parties to this Docket, issued a Joint Motion for Clarification asking whether the Commission’s January 24, 2022 Order included the transfer of the unserved areas of PGA5.
6. SWS maintains that any decision by TPUC in this docket to change the certificated area of PGA5 could have a precedential effect on any future filings of SWS to expand its present service territory. Therefore, the outcome of the above-captioned proceeding will have a direct impact on the rights, duties, privileges, immunities, or other legal interests of SWS. Moreover, granting this Petition to Intervene is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

Therefore, SWS respectfully requests that TPUC grant its Petition to Intervene.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been served upon the following persons by hand delivery or by United States Mail, with proper postage thereon.

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This 12th day of October 2022.



MICHELE MCGILL