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July 19, 2021

VIA ELECTRONIC FILING

Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

**IN RE: APPLICATION OF LIMESTONE WATER UTILITY OPERATING
COMPANY, LLC FOR AUTHORITY TO SELL OR TRANSFER
TITLE TO THE ASSETS, PROPERTY AND REAL ESTATE OF A
PUBLIC UTILITY AND FOR A CERTIFICATE OF
CONVENIENCE
DOCKET NO 21-00053**

Dear Tory:

Please accept for filing in the above-captioned docket the attached response to the First Discovery Request of the Consumer Advocate.

Sincerely,

A handwritten signature in blue ink that reads "Henry Walker". To the right of the signature is a small, circular blue ink stamp containing the letters "HW".

Henry Walker

Counsel for Cartwright Creek, LLC

HW/mf
Enclosure

4846-3723-7745.2

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

1. Identify the monthly escrow balances established pursuant to Tennessee Public Utility Commission (TPUC or the “Commission”) orders by month since the date of inception through May 2021.

Response:

Cartwright Creek, LLC maintains two escrow accounts that have been approved by the Tennessee Public Utility Commission. The first escrow account relates to tap fee funds received by developers which is recorded in Account 131.2. The second escrow account relates to capital improvement surcharges (\$7.50 monthly) received from all customers that are recorded in Account 131.4. The historic balances of these two accounts is shown below.

Account 131.2 – Tap Fees

	2016	2017	2018	2019	2020	2021
January	\$65,000	\$95,000	\$66,154	\$70,583	\$68,683	\$183,410
February	65,000	95,000	91,154	93,083	66,043	213,410
March	65,000	95,000	91,154	113,083	12,179	263,410
April	65,000	95,000	91,154	113,083	2,444	283,410
May	80,000	95,000	77,706	113,083	2,444	315,210
June	80,000	95,000	85,206	98,083	2,444	191,181
July	80,000	95,000	85,206	98,083	43,410	
August	90,000	95,000	85,206	148,083	43,410	
September	90,000	95,000	72,468	148,083	43,410	
October	90,000	75,000	72,468	148,083	63,410	
November	95,000	75,000	68,083	96,768	113,410	
December	95,000	66,154	68,083	88,683	143,410	

Account 131.4 – Capital Improvement Surcharges

	2016	2017	2018	2019	2020	2021
January			\$66,171	\$138,916	\$10,488	\$37,649
February		\$5,370	72,222	145,456	10,488	44,016
March		10,770	78,135	151,547	488	50,542
April		15,531	84,077	157,756	488	56,912
May		20,816	90,369	164,098	488	63,788
June		26,273	96,610	170,456	488	70,468
July		31,936	102,439	170,456	488	
August		37,653	108,410	176,470	6,226	
September		43,301	114,739	189,028	12,536	
October		48,808	120,870	195,452	18,734	
November		54,751	138,916	201,616	25,061	
December		60,246	132,949	208,023	31,263	

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

2. Will the escrow funds balances established pursuant to Commission order be transferred to and maintained by Limestone, or are such balances proposed to be retained by the ownership of Cartwright Creek? If the former is true, provide a reference within the Agreement or Petition confirming the transfer of funds. If the latter is true, provide a comprehensive justification for the retention of these funds considering prior Commission orders.

Response:

Cartwright Creek expects the Commission to determine whether tap fees and/or CRS funds should be transferred to Limestone and what conditions should apply to such a transfer.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

3. Refer to Order Approving Extension of Surcharge, pp. 7-9, TPUC Docket No. 19-00097 (August 25, 2020). If the Parties' intention within the agreement is that the escrow funds will not be used to enhance the system to bring it into compliance with Tennessee environmental regulations, reconcile this position with the language contained in the Commission's Order in TPUC Docket No. 19-00097.

Response:

Cartwright Creek expects the Commission to determine how funds from the tap fee and CRS accounts will be used by Limestone if the acquisition transaction proposed in this case is approved.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

4. Provide the Cartwright Creek general ledger detail for the period January – May 2021.

Response:

See Confidential Attachment 1-4a for a copy of Cartwright Creek, LLC's ledger for January – May 2021.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF
CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

ATTACHMENT 1-4A – GENERAL LEDGER

Confidential

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CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

5. Provide the Balance Sheet of Cartwright Creek for the month ended May 2021.

Response:

See Confidential Attachment 1-5a for a copy of Cartwright Creek, LLC's Balance Sheet for the month ended May 2021.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF
CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

ATTACHMENT 1-5A – BALANCE SHEET

Confidential

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CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

6. The tariff of Cartwright Creek contains separate rates for the areas of Grassland, Arrington, Hardeman, and Hideaway. Provide the monthly customer counts and revenue generated by customer category (residential, commercial, miscellaneous charges) for each for the period January 2020 through the most recent month available.

Response:

This detail is recorded in the Company's Quarterly Reports to the Commission. See the following confidential attachments for a copy of the Company's Quarterly Reports for the dates requested.

Attachment 6a	March 31, 2020, Quarterly Report (Portions are Confidential).
Attachment 6b	June 30, 2020, Quarterly Report (Portions are Confidential).
Attachment 6c	September 30, 2020, Quarterly Report (Portions are Confidential).
Attachment 6d	December 31, 2020, Quarterly Report (Portions are Confidential).
Attachment 6e	March 31, 2021, Quarterly Report (Portions are Confidential).

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF
CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

ATTACHMENT 1-6A – QUARTERLY REPORTS

QUARTERLY REPORT OF REVENUES, EXPENSES
AND INVESTMENTS - WASTEWATER COMPANIESCompany Name:
Quarter Ending:Cartwright Creek, LLC
March 31, 2020

Income Statement Item (a)	Amount For This Quarter		Year-To-Date		12 Months-To-Date	
	This Year (b)	Last Year (c)	This Year (d)	Last Year (e)	This Year (f)	Last Year (g)
Operating Revenue						
1 Residential Sales	\$118,999	\$120,457	\$118,999	\$120,457	\$488,002	\$472,054
2 Commercial Sales	21,903	25,480	21,903	25,480	86,784	105,477
3 Other Revenues	36,238	73,664	36,238	73,664	120,625	235,400
4 Total Operating Revenues (Lines 1 through 3)	\$177,140	\$219,601	\$177,140	\$219,601	\$695,411	\$812,931
Operating Expenses						
5 Salaries & Wages Expense	\$0	\$0	\$0	\$0	\$0	\$0
6 Purchased Wastewater Treatment	0	0	0	0	0	0
7 Sludge Removal Expense	6,750	0	6,750	0	21,000	46,450
8 Purchased Power	13,714	15,098	13,714	15,098	50,377	53,885
9 Fuel for Power Production	0	0	0	0	0	0
10 Chemicals	4,544	3,319	4,544	3,319	14,635	19,140
11 Materials and Supplies	3,375	2,284	3,375	2,284	8,766	8,500
12 Contractual Services	125,098	101,586	125,098	101,586	645,050	500,466
13 Rents	0	0	0	0	0	0
14 Transportation Expense	2,922	6,810	2,922	6,810	17,747	17,528
15 Insurance Expense	9,690	8,693	9,690	8,693	44,883	45,626
16 Regulatory Commission Expense	0	3,579	0	3,579	0	3,579
17 Bad Debt Expense	9,461	0	9,461	0	9,461	0
18 Miscellaneous Expense	20,039	51,994	20,039	51,994	161,435	98,048
19 Depreciation & Amortization Expense	0	0	0	0	0	0
20 Taxes Other Than Income Taxes	10,046	8,391	10,046	8,391	18,893	17,480
21 Income Taxes	0	0	0	0	0	0
22 Total Operating Expenses (Lines 5 through 21)	\$205,639	\$201,754	\$205,639	\$201,754	\$992,247	\$810,702
23 Net Operating Income (Line 4 less Line 22)	-\$28,499	\$17,847	-\$28,499	\$17,847	-\$296,836	\$2,229
Selected Balance Sheet Items						
(a)	Balance End of Quarter		Average 12 MTD			
	This Year (h)	Last Year (i)	This Year (j)	Last Year (k)		
24 Utility Plant in Service	\$5,267,109	\$4,933,859	\$5,012,713	\$4,932,763		
25 Construction Work in Process	0	0	0	0		
26 Utility Plant Acquisition Adjustment	0	0	0	0		
27 Property Held For Future Use	0	0	0	0		
28 Accumulated Depreciation & Amortization	968,952	968,952	968,952	968,952		
29 Materials & Supplies	0	0	0	0		
30 Unamortized Investment Tax Credit	0	0	0	0		
31 Deferred Income Tax	0	0	0	0		
32 Contributions in Aid of Construction	4,511,648	4,083,191	4,277,739	4,083,191		
33 Customer Advances for Construction	0	0	0	0		
34 Preferred Stock	200	200	200	200		
35 Common Stock	0	0	0	0		
36 Premium on Capital Stock or Other Stock	0	0	0	0		
37 Retained Earnings	-1,273,053	-1,075,390	-1,261,207	-1,095,623		
38 Long Term Debt	1,212,468	1,212,468	1,212,468	1,212,468		

Type of Customer (a)	Number Billed at the End of the Period	
	This Year (b)	Last Year (c)
39 Residential	780	854
40 Commercial	39	39
41 Other	0	0
42 Total	819	893

INSTRUCTIONS

- 1 This report is required for all companies that had operating revenues in excess of \$100,000 during the preceeding year, but less than \$1,500,000 per TRA Rule 1220-4-1-.10. Type amounts onto spreadsheet and file report sixty days after the reported ending date.
- 2 Show amounts rounded to the nearest dollar.
- 3 List other customers listed in the meter section under the "Remarks" section below.
- 4 Put any additional comments in the "Remarks" section below.

REMARKS

I certify that to the best of my knowledge and belief, this is a true and correct report:

Date: May 31, 2020

Signature: _____

Name: Thomas L. Kolschowsky

Title: Corporate Counsel

Address: PO Box 147
1551 Thompson's Station Road West

City/State/Zip: Thompson's Station 37179

Phone: 630-469-3331

SUPPLEMENTAL FINANCIAL DATA TO TRA FORM (PSC-3.04)
FOR THE QUARTER ENDED MARCH 31, 2020

Line #		Average For 12 MTD
	Additions:	
1	Plant-In-Service	5,012,713
2	Plant Under Construction	0
3	Property Held For Future Use	
4	Materials and Supplies	
5	Other Additions (Itemize):	
6		
7		
8	Total Additions	5,012,713
	Deductions:	
9	Accumulated Depreciation	968,952
10	Accumulated Deferred Income Taxes	
11	Unamortized Investment Credit - Pre 1971	
12	Customer Deposits	
13	Other Deductions (Itemize):	
14	Contributions in Aid of Construction	4,277,739
15		
16	Total Deductions	5,246,691
17	Rate Base (Line 8 less line 16)	-233,978
18	Net Operating Income (NOI)	-296,836
	Adjustments (Itemize):	
19		
20		
21		
22		
23		
24	Adjusted Net Operating Income	-296,836
25	Rate of Return (Line 24 divided by Line 17)	126.86%

All amounts should be calculated in a manner consistent with the last Rate Order issued by the Authority for this company.

CONTINUING SURVEILLANCE CONSIDERATIONS: Estimate the effect on net operating income of very significant known changes occurring within the period covered by this report which are not fully reflected in the revenue and expense amounts shown in the report.

CARTWRIGHT CREEK, LLC
SUPPLEMENTAL CAPITAL SURCHARGE REPORT
FOR THE QUARTER ENDED MARCH 31, 2020

Statement Date	Customers	CIS Rate	Capital Improvement Liability (Account 235.1)		Capital Improvement Cash Reserve (Account 131.4)		Funding
			Accrual	Expended	Balance	Withdrawals	Over/(Under)
DEC 2019	839	7.50	6,292.50	0.00	215,857.50	0.00	-1,780.34
JAN	819	0.00	0.00	203,589.53 A/	12,267.97	203,589.53 A/	-1,780.34
FEB	818	0.00	0.00	0.00	12,267.97	10,000.00	-1,780.34
MAR	819	0.00	0.00	10,000.00 A/	2,267.97	10,000.00 A/	-1,780.34
					6,054.19	0.00	
					0.00	0.00	
					10,000.00	10,000.00	
					0.00	10,000.00 A/	
					487.63		
					487.63		
				Acct 235.1 at 3/31	487.63		
				Bank Acct x2776 at 3/31	487.63		
						Acct 131.4 at 3/31	487.63

* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.

	Accrual Basis	Cash Basis	Difference
Dec 2019 Balance			1,780.34
January	0.00	0.00	1,780.34
February	0.00	0.00	1,780.34
March	0.00	0.00	1,780.34
Total	0.00	0.00	

A/ Check #5092 in the amount of \$233,589.53 was written to Insituform Technologies, LLC on 1/7/2020. This payment was funded primarily from the \$213,589.53 withdrawal from the Capital Improvement Cash Reserve and was for the sewer rehab project # 250408.

NOTE: See attached bank statements for the current quarter for supporting verification.

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QUARTERLY REPORT OF REVENUES, EXPENSES
AND INVESTMENTS - WASTEWATER COMPANIESCompany Name:
Quarter Ending:Cartwright Creek, LLC
June 30, 2020

Income Statement Item (a)	Amount For This Quarter		Year-To-Date		12 Months-To-Date	
	This Year (b)	Last Year (c)	This Year (d)	Last Year (e)	This Year (f)	Last Year (g)
Operating Revenue						
1 Residential Sales	\$156,221	\$121,719	\$275,220	\$242,176	\$522,504	\$478,146
2 Commercial Sales	22,233	21,627	44,136	47,107	87,390	100,266
3 Other Revenues	34,031	38,898	70,269	112,562	115,758	232,298
4 Total Operating Revenues (Lines 1 through 3)	\$212,484	\$182,244	\$389,625	\$401,845	\$725,652	\$810,710
Operating Expenses						
5 Salaries & Wages Expense	\$0	\$0	\$0	\$0	\$0	\$0
6 Purchased Wastewater Treatment	0	0	0	0	0	0
7 Sludge Removal Expense	0	0	6,750	0	21,000	29,500
8 Purchased Power	12,960	12,159	26,674	27,257	51,178	53,302
9 Fuel for Power Production	0	0	0	0	0	0
10 Chemicals	6,416	4,140	10,960	7,459	16,911	14,633
11 Materials and Supplies	5,649	1,300	9,024	3,584	13,115	7,279
12 Contractual Services	165,750	189,199	290,848	290,785	621,601	589,582
13 Rentals	0	0	0	0	0	0
14 Transportation Expense	2,174	4,948	5,096	11,758	14,973	19,088
15 Insurance Expense	9,422	8,683	19,112	17,377	45,622	37,558
16 Regulatory Commission Expense	3,429	0	3,429	3,579	3,429	3,579
17 Bad Debt Expense	0	0	9,461	0	9,461	0
18 Miscellaneous Expense	16,025	31,061	36,064	83,055	146,399	91,454
19 Depreciation & Amortization Expense	0	0	0	0	0	0
20 Taxes Other Than Income Taxes	4,672	4,624	14,718	13,015	18,941	18,205
21 Income Taxes	0	0	0	0	0	0
22 Total Operating Expenses (Lines 5 through 21)	\$226,497	\$256,114	\$432,136	\$457,869	\$962,630	\$864,180
23 Net Operating Income (Line 4 less Line 22)	-\$14,014	-\$73,870	-\$42,511	-\$56,024	-\$236,978	-\$53,470
Selected Balance Sheet Items						
(a)	Balance End of Quarter		Average 12 MTD			
	This Year (h)	Last Year (i)	This Year (j)	Last Year (k)		
24 Utility Plant in Service	\$5,400,265	\$4,934,099	\$5,129,254	\$4,933,919		
25 Construction Work in Process	0	0	0	0		
26 Utility Plant Acquisition Adjustment	0	0	0	0		
27 Property Held For Future Use	0	0	0	0		
28 Accumulated Depreciation & Amortization	968,952	968,952	968,952	968,952		
29 Materials & Supplies	0	0	0	0		
30 Unamortized Investment Tax Credit	0	0	0	0		
31 Deferred Income Tax	0	0	0	0		
32 Contributions in Aid of Construction	4,603,991	4,083,191	4,407,939	4,086,941		
33 Customer Advances for Construction	0	0	0	0		
34 Preferred Stock	0	0	0	0		
35 Common Stock	200	200	200	200		
36 Premium on Capital Stock or Other Stock	0	0	0	0		
37 Retained Earnings	-1,246,069	-1,149,100	-1,285,449	-1,109,218		
38 Long Term Debt	1,251,894	1,212,468	1,222,325	1,212,468		

Type of Customer (a)	Number Billed at the End of the Period	
	This Year (b)	Last Year (c)
39 Residential	787	846
40 Commercial	39	39
41 Other	0	0
42 Total	826	885

INSTRUCTIONS

- 1 This report is required for all companies that had operating revenues in excess of \$100,000 during the preceeding year, but less than \$1,500,000 per TRA Rule 1220-4-1-. 10. Type amounts onto spreadsheet and file report sixty days after the reported ending date.
- 2 Show amounts rounded to the nearest dollar.
- 3 List other customers listed in the meter section under the "Remarks" section below.
- 4 Put any additional comments in the "Remarks" section below.

REMARKS

I certify that to the best of my knowledge and belief, this is a true and correct report:

Date: August 31, 2020

Signature: _____

Name: Thomas L. Kolschowsky

Title: Corporate Counsel

Address: PO Box 147
1551 Thompson's Station Road West

City/State/Zip: Thompson's Station 37179

Phone: 630-469-3331

SUPPLEMENTAL FINANCIAL DATA TO TRA FORM (PSC-3.04)
FOR THE QUARTER ENDED JUNE 30, 2020

Line #		Average For 12 MTD
	Additions:	
1	Plant-In-Service	5,129,254
2	Plant Under Construction	0
3	Property Held For Future Use	
4	Materials and Supplies	
5	Other Additions (Itemize):	
6		
7		
8	Total Additions	5,129,254
	Deductions:	
9	Accumulated Depreciation	968,952
10	Accumulated Deferred Income Taxes	
11	Unamortized Investment Credit - Pre 1971	
12	Customer Deposits	
13	Other Deductions (Itemize):	
14	Contributions in Aid of Construction	4,407,939
15		
16	Total Deductions	5,376,891
17	Rate Base (Line 8 less line 16)	-247,637
18	Net Operating Income (NOI)	-236,978
	Adjustments (Itemize):	
19		
20		
21		
22		
23		
24	Adjusted Net Operating Income	-236,978
25	Rate of Return (Line 24 divided by Line 17)	95.70%

All amounts should be calculated in a manner consistent with the last Rate Order issued by the Authority for this company.

CONTINUING SURVEILLANCE CONSIDERATIONS: Estimate the effect on net operating income of very significant known changes occurring within the period covered by this report which are not fully reflected in the revenue and expense amounts shown in the report.

Statement Date	Customers	CIS Rate	Capital Improvement Liability (Account 235.1)	Capital Improvement Cash Reserve (Account 131.4)	Funding Over/(Under)	
			Accrual	Additions	Withdrawals	Balance
DEC 2019	839	7.50	6,292.50	6,054.19	0.00	214,077.16
JAN	819	0.00	0.00	0.00	203,589.53 A/	10,487.63
FEB	818	0.00	0.00	0.00	10,000.00	10,487.63
MAR	819	0.00	0.00	0.00	10,000.00 A/	487.63
APR	820	0.00	0.00	0.00	0.00	487.63
MAY	829	0.00	0.00	0.00	0.00	487.63
JUN	826	0.00	0.00	0.00	0.00	487.63
			Acct 235.1 at 6/30		Acct 131.4 at 6/30	487.63
			Bank Acct x2776 at 6/30			
* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.						
		Accrual Basis	Cash Basis	Difference		
Dec 2019 Balance				1,780.34		
January		0.00	0.00	1,780.34		
February		0.00	0.00	1,780.34		
March		0.00	0.00	1,780.34		
April		0.00	0.00	1,780.34		
May		0.00	0.00	1,780.34		
June		0.00	0.00	1,780.34		
Total		0.00	0.00			

* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.

Dec 2019 Balance

January	0.00	0.00	1,780.34
February	0.00	0.00	1,780.34
March	0.00	0.00	1,780.34
April	0.00	0.00	1,780.34
May	0.00	0.00	1,780.34
June	0.00	0.00	1,780.34
Total	0.00	0.00	

A/ Check #5092 in the amount of \$233,589.53 was written to Insituform Technologies, LLC on 1/7/2020. This payment was funded primarily from the \$213,589.53 withdrawal from the Capital Improvement Cash Reserve and was for the sewer rehab project # 250408.

NOTE: See attached bank statements for the current quarter for supporting verification.

Confidential

Confidential

Confidential

QUARTERLY REPORT OF REVENUES, EXPENSES
AND INVESTMENTS - WASTEWATER COMPANIES

Company Name:
Quarter Ending:

Cartwright Creek, LLC
September 30, 2020

Income Statement Item (a)	Amount For This Quarter		Year-To-Date		12 Months-To-Date	
	This Year (b)	Last Year (c)	This Year (d)	Last Year (e)	This Year (f)	Last Year (g)
Operating Revenue						
1 Residential Sales	\$123,111	\$122,304	\$398,331	\$364,480	\$523,311	\$482,983
2 Commercial Sales	22,233	21,627	66,369	68,734	87,996	95,166
3 Other Revenues	39,302	6,305	109,571	118,867	148,755	194,147
4 Total Operating Revenues (Lines 1 through 3)	\$184,646	\$150,236	\$517,271	\$552,081	\$760,062	\$772,296
Operating Expenses						
5 Salaries & Wages Expense	\$0	\$0	\$0	\$0	\$0	\$0
6 Purchased Wastewater Treatment	0	0	0	0	0	0
7 Sludge Removal Expense	22,650	14,250	29,400	14,250	29,400	27,250
8 Purchased Power	13,223	11,629	39,897	38,886	52,772	52,029
9 Fuel for Power Production	0	0	0	0	0	0
10 Chemicals	442	1,012	11,402	8,471	16,341	12,270
11 Materials and Supplies	10,633	2,197	19,657	5,781	21,551	7,664
12 Contractual Services	133,974	182,790	424,822	473,575	572,785	632,923
13 Rents	0	0	0	0	0	0
14 Transportation Expense	3,726	3,831	8,822	15,589	14,868	19,531
15 Insurance Expense	20,649	16,699	39,761	34,076	49,572	42,768
16 Regulatory Commission Expense	0	0	3,429	3,579	3,429	3,579
17 Bad Debt Expense	0	0	9,461	0	9,461	0
18 Miscellaneous Expense	20,112	34,771	56,176	117,826	131,740	101,702
19 Depreciation & Amortization Expense	0	0	0	0	0	0
20 Taxes Other Than Income Taxes	0	0	14,718	13,015	18,941	18,205
21 Income Taxes	0	0	0	0	0	0
22 Total Operating Expenses (Lines 5 through 21)	\$225,408	\$267,179	\$657,545	\$725,048	\$920,860	\$917,921
23 Net Operating Income (Line 4 less Line 22)	-\$40,762	-\$116,943	-\$83,274	-\$172,967	-\$160,798	-\$145,625
Selected Balance Sheet Items						
(a)	Balance End of Quarter		Average 12 MTD			
	This Year (h)	Last Year (i)	This Year (j)	Last Year (k)		
24 Utility Plant in Service	\$5,419,699	\$4,942,251	\$5,129,254	\$4,936,017		
25 Construction Work in Process	0	0	0	0		
26 Utility Plant Acquisition Adjustment	0	0	0	0		
27 Property Held For Future Use	0	0	0	0		
28 Accumulated Depreciation & Amortization	968,952	968,952	968,952	968,952		
29 Materials & Supplies	0	0	0	0		
30 Unamortized Investment Tax Credit	0	0	0	0		
31 Deferred Income Tax	0	0	0	0		
32 Contributions in Aid of Construction	4,738,992	4,258,058	4,407,939	4,124,408		
33 Customer Advances for Construction	0	0	0	0		
34 Preferred Stock	0	0	0	0		
35 Common Stock	200	200	200	200		
36 Premium on Capital Stock or Other Stock	0	0	0	0		
37 Retained Earnings	-1,297,419	-1,269,508	-1,285,449	-1,146,038		
38 Long Term Debt	1,251,894	1,212,468	1,222,325	1,212,468		

Type of Customer (a)	Number Billed at the End of the Period	
	This Year (b)	Last Year (c)
39 Residential	804	845
40 Commercial	39	39
41 Other	0	0
42 Total	843	884

INSTRUCTIONS

- 1 This report is required for all companies that had operating revenues in excess of \$100,000 during the preceeding year, but less than \$1,500,000 per TRA Rule 1220-4-1-.10. Type amounts onto spreadsheet and file report sixty days after the reported ending date.
- 2 Show amounts rounded to the nearest dollar.
- 3 List other customers listed in the meter section under the "Remarks" section below.
- 4 Put any additional comments in the "Remarks" section below.

REMARKS

I certify that to the best of my knowledge and belief, this is a true and correct report:

Date: November 30, 2020

Signature: _____

Name: Thomas L. Kolschowsky

Title: Corporate Counsel

Address: PO Box 147
1551 Thompson's Station Road West

City/State/Zip: Thompson's Station 37179

Phone: 630-469-3331

SUPPLEMENTAL FINANCIAL DATA TO TRA FORM (PSC-3.04)
FOR THE QUARTER ENDED SEPTEMBER 30, 2020

Line #		Average For 12 MTD
	Additions:	
1	Plant-In-Service	5,129,254
2	Plant Under Construction	0
3	Property Held For Future Use	
4	Materials and Supplies	
5	Other Additions (Itemize):	
6		
7		
8	Total Additions	<hr/> 5,129,254
	Deductions:	
9	Accumulated Depreciation	968,952
10	Accumulated Deferred Income Taxes	
11	Unamortized Investment Credit - Pre 1971	
12	Customer Deposits	
13	Other Deductions (Itemize):	
14	Contributions in Aid of Construction	4,407,939
15		
16	Total Deductions	<hr/> 5,376,891
17	Rate Base (Line 8 less line 16)	-247,637
18	Net Operating Income (NOI)	-160,798
	Adjustments (Itemize):	
19		
20		
21		
22		
23		
24	Adjusted Net Operating Income	<hr/> -160,798
25	Rate of Return (Line 24 divided by Line 17)	64.93%

All amounts should be calculated in a manner consistent with the last Rate Order issued by the Authority for this company.

CONTINUING SURVEILLANCE CONSIDERATIONS: Estimate the effect on net operating income of very significant known changes occurring within the period covered by this report which are not fully reflected in the revenue and expense amounts shown in the report.

CARTWRIGHT CREEK, LLC
SUPPLEMENTAL CAPITAL SURCHARGE REPORT
FOR THE QUARTER ENDED SEPTEMBER 30, 2020

Statement Date	Customers	Capital Improvement Liability (Account 235.1)			Capital Improvement Cash Reserve (Account 131.4)			Funding Over/(Under)	
		CIS Rate	Accrual	Expended	Balance *	Additions	Withdrawals	Balance	
DEC 2019	839	7.50	6,292.50	0.00	215,857.50	6,054.19	0.00	214,077.16	-1,780.34
JAN	819	0.00	0.00	203,589.53 A/	12,267.97	0.00	203,589.53 A/	10,487.63	-1,780.34
FEB	818	0.00	0.00	0.00	12,267.97	10,000.00	10,000.00	10,487.63	-1,780.34
MAR	819	0.00	0.00	10,000.00 A/	2,267.97	0.00	10,000.00 A/	487.63	-1,780.34
APR	820	0.00	0.00	0.00	2,267.97	0.00	0.00	487.63	-1,780.34
MAY	829	0.00	0.00	0.00	2,267.97	0.00	0.00	487.63	-1,780.34
JUN	826	0.00	0.00	0.00	2,267.97	0.00	0.00	487.63	-1,780.34
JUL	835	7.50	6,262.50	0.00	8,530.47	5,738.16	0.00	487.63	-1,780.34
AUG	841	7.50	6,307.50	0.00	14,837.97	6,310.23	0.00	6,225.79	-2,304.68
SEP	843	7.50	6,322.50	0.00	21,160.47	6,197.81	0.00	12,536.02	-2,301.95
								18,733.83	-2,426.64
				Acct 235.1 at 9/30	18,733.83		Acct 131.4 at 9/30	18,733.83	
				Bank Acct x2776 at 9/30	18,733.83				
* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.									
		Accrual Basis	Cash Basis		Difference				
	Dec 2019 Balance				1,780.34				
	January	0.00	0.00		1,780.34				
	February	0.00	0.00		1,780.34				
	March	0.00	0.00		1,780.34				
	April	0.00	0.00		1,780.34				
	May	0.00	0.00		1,780.34				
	June	0.00	0.00		1,780.34				
	July		5,738.16		1,780.34				
	August	6,262.50			2,304.68				
	September	6,307.50			2,301.95				
		6,322.50			2,426.64				

* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.

	Accrual Basis	Cash Basis	Difference
Dec 2019 Balance			1,780.34
January	0.00	0.00	1,780.34
February	0.00	0.00	1,780.34
March	0.00	0.00	1,780.34
April	0.00	0.00	1,780.34
May	0.00	0.00	1,780.34
June	0.00	0.00	1,780.34
July	6,262.50	5,738.16	2,304.68
August	6,307.50	6,310.23	2,301.95
September	6,322.50	6,197.81	2,426.64

Total 18,892.50 18,246.20

A/ Check #5092 in the amount of \$233,589.53 was written to Insituform Technologies, LLC on 1/7/2020. This payment was funded primarily from the \$213,589.53 withdrawal from the Capital Improvement Cash Reserve and was for the sewer rehab project # 250408.

NOTE: See attached bank statements for the current quarter for supporting verification.

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QUARTERLY REPORT OF REVENUES, EXPENSES
AND INVESTMENTS - WASTEWATER COMPANIES

Company Name:
Quarter Ending:

Cartwright Creek, LLC
December 31, 2020

Income Statement Item (a)	Amount For This Quarter		Year-To-Date		12 Months-To-Date	
	This Year (b)	Last Year (c)	This Year (d)	Last Year (e)	This Year (f)	Last Year (g)
Operating Revenue						
1 Residential Sales	\$124,240	\$124,980	\$522,571	\$489,460	\$522,571	\$489,460
2 Commercial Sales	22,233	21,627	88,602	90,361	88,602	90,361
3 Other Revenues	47,011	39,184	156,582	158,051	156,582	158,051
4 Total Operating Revenues (Lines 1 through 3)	\$193,484	\$185,791	\$767,755	\$737,872	\$767,755	\$737,872
Operating Expenses						
5 Salaries & Wages Expense	\$0	\$0	\$0	\$0	\$0	\$0
6 Purchased Wastewater Treatment	0	0	0	0	0	0
7 Sludge Removal Expense	22,500	0	51,900	14,250	51,900	14,250
8 Purchased Power	12,743	12,875	52,640	51,761	52,640	51,761
9 Fuel for Power Production	0	0	0	0	0	0
10 Chemicals	407	4,939	11,809	13,410	11,809	13,410
11 Materials and Supplies	5,595	1,894	25,252	7,675	25,252	7,675
12 Contractual Services	102,467	147,963	527,289	621,538	527,289	621,538
13 Rents	0	0	0	0	0	0
14 Transportation Expense	2,658	6,046	11,480	21,635	11,480	21,635
15 Insurance Expense	8,317	9,811	48,078	43,887	48,078	43,887
16 Regulatory Commission Expense	686	0	4,115	3,579	4,115	3,579
17 Bad Debt Expense	0	0	9,461	0	9,461	0
18 Miscellaneous Expense	15,822	75,564	71,998	193,390	71,998	193,390
19 Depreciation & Amortization Expense	0	0	0	0	0	0
20 Taxes Other Than Income Taxes	3,810	4,223	18,528	17,238	18,528	17,238
21 Income Taxes	0	0	0	0	0	0
22 Total Operating Expenses (Lines 5 through 21)	\$175,006	\$263,315	\$832,550	\$988,363	\$832,550	\$988,363
23 Net Operating Income (Line 4 less Line 22)	\$18,479	-\$77,524	-\$64,795	-\$250,491	-\$64,795	-\$250,491
Selected Balance Sheet Items						
(a)	Balance End of Quarter		Average 12 MTD			
	This Year (h)	Last Year (i)	This Year (j)	Last Year (k)		
24 Utility Plant in Service	\$5,422,867	\$4,907,392	\$5,249,408	\$4,929,400		
25 Construction Work in Process	0	0	0	0		
26 Utility Plant Acquisition Adjustment	0	0	0	0		
27 Property Held For Future Use	0	0	0	0		
28 Accumulated Depreciation & Amortization	968,952	968,952	968,952	968,952		
29 Materials & Supplies	0	0	0	0		
30 Unamortized Investment Tax Credit	0	0	0	0		
31 Deferred Income Tax	0	0	0	0		
32 Contributions in Aid of Construction	4,903,993	4,258,058	4,569,423	4,170,625		
33 Customer Advances for Construction	0	0	0	0		
34 Preferred Stock	0	0	0	0		
35 Common Stock	200	200	200	200		
36 Premium on Capital Stock or Other Stock	0	0	0	0		
37 Retained Earnings	-1,283,953	-1,353,165	-1,289,060	-1,211,791		
38 Long Term Debt	1,251,894	1,212,468	1,232,181	1,212,468		

Type of Customer (a)	Number Billed at the End of the Period	
	This Year (b)	Last Year (c)
39 Residential	819	800
40 Commercial	39	39
41 Other	0	0
42 Total	858	839

INSTRUCTIONS

- 1 This report is required for all companies that had operating revenues in excess of \$100,000 during the preceeding year, but less than \$1,500,000 per TRA Rule 1220-4-1-.10. Type amounts onto spreadsheet and file report sixty days after the reported ending date.
- 2 Show amounts rounded to the nearest dollar.
- 3 List other customers listed in the meter section under the "Remarks" section below.
- 4 Put any additional comments in the "Remarks" section below.

REMARKS

I certify that to the best of my knowledge and belief, this is a true and correct report:

Date: February 28, 2021

Signature: _____

Name: Thomas L. Kolschowsky

Title: Corporate Counsel

Address: PO Box 147
1551 Thompson's Station Road West

City/State/Zip: Thompson's Station 37179

Phone: 630-469-3331

SUPPLEMENTAL FINANCIAL DATA TO TRA FORM (PSC-3.04)
FOR THE QUARTER ENDED DECEMBER 31, 2020

Line #		Average For 12 MTD
	Additions:	
1	Plant-In-Service	5,249,408
2	Plant Under Construction	0
3	Property Held For Future Use	
4	Materials and Supplies	
5	Other Additions (Itemize):	
6		
7		
8	Total Additions	5,249,408
	Deductions:	
9	Accumulated Depreciation	968,952
10	Accumulated Deferred Income Taxes	
11	Unamortized Investment Credit - Pre 1971	
12	Customer Deposits	
13	Other Deductions (Itemize):	
14	Contributions in Aid of Construction	4,569,423
15		
16	Total Deductions	5,538,375
17	Rate Base (Line 8 less line 16)	-288,966
18	Net Operating Income (NOI)	-64,795
	Adjustments (Itemize):	
19		
20		
21		
22		
23		
24	Adjusted Net Operating Income	-64,795
25	Rate of Return (Line 24 divided by Line 17)	22.42%

All amounts should be calculated in a manner consistent with the last Rate Order issued by the Authority for this company.

CONTINUING SURVEILLANCE CONSIDERATIONS: Estimate the effect on net operating income of very significant known changes occurring within the period covered by this report which are not fully reflected in the revenue and expense amounts shown in the report.

CARTWRIGHT CREEK, LLC
SUPPLEMENTAL CAPITAL SURCHARGE REPORT
FOR THE QUARTER ENDED DECEMBER 31, 2020

Statement Date	Customers	CIS Rate	Capital Improvement Liability (Account 235.1)	Capital Improvement Cash Reserve (Account 131.4)	Funding Over/(Under)
			Accrual	Balance	
DEC 2019	839	7.50	6,292.50	214,077.16	-1,780.34
JAN	819	0.00	0.00	10,487.63	-1,780.34
FEB	818	0.00	0.00	10,487.63	-1,780.34
MAR	819	0.00	0.00	10,487.63	-1,780.34
APR	820	0.00	0.00	487.63	-1,780.34
MAY	829	0.00	0.00	487.63	-1,780.34
JUN	826	0.00	0.00	487.63	-1,780.34
JUL	835	7.50	6,262.50	487.63	-1,780.34
AUG	841	7.50	6,307.50	487.63	-1,780.34
SEP	843	7.50	6,322.50	6,225.79	-2,304.68
OCT	851	7.50	6,382.50	12,536.02	-2,301.95
NOV	853	7.50	6,397.50	18,733.83	-2,426.64
DEC	858	7.50	6,435.00	25,061.49	-2,481.48
				31,262.67	-2,677.80
				37,648.53	-2,726.94
			Acct 235.1 at 12/31	Acct 131.4 at 12/31	
				37,648.53	
			Bank Acct x2776 at 1/31/21		
				37,648.53	

* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.

	Accrual Basis	Cash Basis	Difference
Dec 2019 Balance			1,780.34
January	0.00	0.00	1,780.34
February	0.00	0.00	1,780.34
March	0.00	0.00	1,780.34
April	0.00	0.00	1,780.34
May	0.00	0.00	1,780.34
June	0.00	0.00	1,780.34
July	0.00	0.00	1,780.34
August	6,262.50	5,738.16	2,304.68
September	6,307.50	6,310.23	2,301.95
October	6,322.50	6,197.81	2,426.64
November	6,382.50	6,327.66	2,481.48
December	6,397.50	6,201.18	2,677.80
Total	38,107.50	37,160.90	2,726.94

A/ Check #5092 in the amount of \$233,589.53 was written to Insituform Technologies, LLC on 1/7/2020. This payment was funded primarily from the \$213,589.53 withdrawal from the Capital Improvement Cash Reserve and was for the sewer rehab project # 250408.

NOTE: See attached bank statements for the current quarter for supporting verification.

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QUARTERLY REPORT OF REVENUES, EXPENSES
AND INVESTMENTS - WASTEWATER COMPANIES

Company Name:
Quarter Ending:

Cartwright Creek, LLC
March 31, 2021

Income Statement Item (a)	Amount For This Quarter		Year-To-Date		12 Months-To-Date	
	This Year (b)	Last Year (c)	This Year (d)	Last Year (e)	This Year (f)	Last Year (g)
Operating Revenue						
1 Residential Sales	\$126,176	\$118,999	\$126,176	\$118,999	\$529,748	\$488,002
2 Commercial Sales	20,704	21,903	20,704	21,903	87,403	86,784
3 Other Revenues	55,575	36,238	55,575	36,238	175,919	120,625
4 Total Operating Revenues (Lines 1 through 3)	\$202,455	\$177,140	\$202,455	\$177,140	\$793,070	\$695,411
Operating Expenses						
5 Salaries & Wages Expense	\$0	\$0	\$0	\$0	\$0	\$0
6 Purchased Wastewater Treatment	0	0	0	0	0	0
7 Sludge Removal Expense	12,750	6,750	12,750	6,750	57,900	21,000
8 Purchased Power	14,441	13,714	14,441	13,714	53,367	50,377
9 Fuel for Power Production	0	0	0	0	0	0
10 Chemicals	2,119	4,544	2,119	4,544	9,384	14,635
11 Materials and Supplies	2,203	3,375	2,203	3,375	24,080	8,766
12 Contractual Services	103,404	125,098	103,404	125,098	505,595	645,050
13 Rents	0	0	0	0	0	0
14 Transportation Expense	3,750	2,922	3,750	2,922	12,308	17,747
15 Insurance Expense	0	9,690	0	9,690	38,388	44,883
16 Regulatory Commission Expense	3,428	0	3,428	0	7,543	0
17 Bad Debt Expense	0	9,461	0	9,461	0	9,461
18 Miscellaneous Expense	49,738	20,039	49,738	20,039	101,697	161,435
19 Depreciation & Amortization Expense	0	0	0	0	0	0
20 Taxes Other Than Income Taxes	9,693	10,046	9,693	10,046	18,175	18,893
21 Income Taxes	0	0	0	0	0	0
22 Total Operating Expenses (Lines 5 through 21)	\$201,527	\$205,639	\$201,527	\$205,639	\$828,437	\$992,247
23 Net Operating Income (Line 4 less Line 22)	\$928	-\$28,499	\$928	-\$28,499	-\$35,367	-\$296,836
Selected Balance Sheet Items						
(a)	Balance End of Quarter		Average 12 MTD			
	This Year (h)	Last Year (i)	This Year (j)	Last Year (k)		
24 Utility Plant in Service	\$5,422,867	\$5,267,109	\$5,378,277	\$5,012,713		
25 Construction Work in Process	0	0	0	0		
26 Utility Plant Acquisition Adjustment	0	0	0	0		
27 Property Held For Future Use	0	0	0	0		
28 Accumulated Depreciation & Amortization	968,952	968,952	968,952	968,952		
29 Materials & Supplies	0	0	0	0		
30 Unamortized Investment Tax Credit	0	0	0	0		
31 Deferred Income Tax	0	0	0	0		
32 Contributions in Aid of Construction	5,064,431	4,511,648	4,771,016	4,277,739		
33 Customer Advances for Construction	0	0	0	0		
34 Preferred Stock	200	200	200	200		
35 Common Stock	0	0	0	0		
36 Premium on Capital Stock or Other Stock	0	0	0	0		
37 Retained Earnings	-1,300,407	-1,273,053	-1,275,871	-1,261,207		
38 Long Term Debt	1,251,894	1,212,468	1,242,038	1,212,468		

Type of Customer (a)	Number Billed at the End of the Period	
	This Year (b)	Last Year (c)
39 Residential	831	800
40 Commercial	39	39
41 Other	0	0
42 Total	870	839

INSTRUCTIONS

- 1 This report is required for all companies that had operating revenues in excess of \$100,000 during the preceeding year, but less than \$1,500,000 per TRA Rule 1220-4-1-.10. Type amounts onto spreadsheet and file report sixty days after the reported ending date.
- 2 Show amounts rounded to the nearest dollar.
- 3 List other customers listed in the meter section under the "Remarks" section below.
- 4 Put any additional comments in the "Remarks" section below.

REMARKS

I certify that to the best of my knowledge and belief, this is a true and correct report:

Date: May 31, 2021

Signature: _____

Name: Thomas L. Kolschowsky

Title: Corporate Counsel

Address: PO Box 147
1551 Thompson's Station Road West

City/State/Zip: Thompson's Station 37179

Phone: 630-469-3331

SUPPLEMENTAL FINANCIAL DATA TO TRA FORM (PSC-3.04)
FOR THE QUARTER ENDED MARCH 31, 2021

Line #		Average For 12 MTD
	Additions:	
1	Plant-In-Service	5,378,277
2	Plant Under Construction	0
3	Property Held For Future Use	
4	Materials and Supplies	
5	Other Additions (Itemize):	
6		
7		
8	Total Additions	<hr/> 5,378,277
	Deductions:	
9	Accumulated Depreciation	968,952
10	Accumulated Deferred Income Taxes	
11	Unamortized Investment Credit - Pre 1971	
12	Customer Deposits	
13	Other Deductions (Itemize):	
14	Contributions in Aid of Construction	4,771,016
15		
16	Total Deductions	<hr/> 5,739,968
17	Rate Base (Line 8 less line 16)	-361,691
18	Net Operating Income (NOI)	-35,367
	Adjustments (Itemize):	
19		
20		
21		
22		
23		
24	Adjusted Net Operating Income	<hr/> -35,367
25	Rate of Return (Line 24 divided by Line 17)	9.78%

All amounts should be calculated in a manner consistent with the last Rate Order issued by the Authority for this company.

CONTINUING SURVEILLANCE CONSIDERATIONS: Estimate the effect on net operating income of very significant known changes occurring within the period covered by this report which are not fully reflected in the revenue and expense amounts shown in the report.

CARTWRIGHT CREEK, LLC
SUPPLEMENTAL CAPITAL SURCHARGE REPORT
FOR THE QUARTER ENDED MARCH 31, 2021

Statement Date	Customers	Capital Improvement Liability (Account 235.1)		Balance *	Capital Improvement Cash Reserve (Account 131.4)		Funding Over/(Under)
		CIS Rate	Accrual		Additions	Withdrawals	
DEC 2020	858	7.50	6,435.00	40,375.47	6,385.86	0.00	-2,726.94
JAN	860	7.50	6,450.00	46,825.47	6,367.17	0.00	-2,809.77
FEB	872	7.50	6,540.00	53,365.47	6,526.78	0.00	-2,822.99
MAR	870	7.50	6,525.00	59,890.47	6,369.66	0.00	-2,978.33
					Acct 131.4 at 3/31		56,912.14
					Acct 235.1 at 3/31		56,912.14
					Bank Acct x2776 at 4/30		56,912.14

* Accrual to Cash Basis Adjustment for timing difference of uncollected Capital Improvement Surcharge.

	Accrual Basis	Cash Basis	Difference
Dec 2020 Balance			2,726.94
January	6,450.00	6,367.17	2,809.77
February	6,540.00	6,526.78	2,822.99
March	6,525.00	6,369.66	2,978.33

Total	19,515.00	19,263.61
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NOTE: See attached bank statements for the current quarter for supporting verification.

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CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

7. Provide a copy of all appraisals relied upon by Cartwright Creek to evaluate an appropriate Purchase/Sale price. To the extent such appraisals differ from the proposed purchase price of the system, provide all analysis reconciling the two amounts.

Response:

Cartwright Creek is not in possession of any appraisals.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

8. Identify the amount of capital injected by Cartwright Creek's owner(s) by year for the period January 2019 to date. For each capital injection, provide supporting documentation which confirms the capital injection.

Response:

The owners of Cartwright Creek, LLC have not injected any capital into the wastewater system since January 2019.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

9. Refer to the Petition, p. 6. Provide a specific list of the accounting, ratemaking, and regulatory approvals which are conditions precedent to closing the Transaction.

Response:

Cartwright Creek, LLC is aware of no regulatory approvals that are required other than approval by the Commission of this docket and TDEC approval of the transfer of the operating permits.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

10. Identify the number and amount of tap fee collections anticipated by CSWR, by year, and that were incorporated into its forecasted financial projects related to Cartwright Creek.

Response:

Cartwright Creek, LLC has no forecast of tap fee collections. Furthermore, Cartwright Creek, LLC is not aware of the internal processes used by CSWR (Limestone) to develop its forecasted financial projections.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

11. Refer to the *Petition*, Exhibit 7 (Confidential), Sales Agreement at p. 5, § 6B. This paragraph contains general language regarding the assumption of liabilities associated with the proposed transaction, further indicating liabilities/obligations of the Seller incurred prior to the date of the transaction shall remain with the Seller. On April 29, 2019, the Tennessee Department of Environment and Conservation (TDEC) issued a Director's Order to Cartwright Creek identifying deadlines to comply with various compliance issues. A copy of the TDEC Director's Order is attached as Exhibit CA-1.
- a. Explain and provide support regarding Cartwright Creek's compliance with the requirements set out in the *Order and Assessment* section of TDEC Director's Order No. WPC18-0100 which are as follows:
 - i. Paragraph XIII, § 1. Submittal of Corrective Action Plan/Engineering Report (CAP/ER).
 - ii. Paragraph XIII, § 2. Completion of all scheduled activities within one year of date of approval by TDEC.
 - iii. Paragraph XIII, § 3. Submission of a Final Report to TDEC six months after completion of CAP/ER.
 - iv. Paragraph XIII, § 4.
 - b. In light of the existing TDEC enforcement actions involving Cartwright Creek, provide a comprehensive explanation to the extent to which Limestone will assume such liabilities in light of § 6 of the Sales Agreement.
 - c. Provide a comprehensive explanation identifying what portion, (if any) of the liabilities established in the Director's Order shall be the financial obligation of Limestone. This response shall include a comprehensive discussion of how the requirements set out in this directive shall be transitioned from Cartwright Creek to Central States and assigned to Limestone including an identification of the financial implications of this distinction.
 - d. Provide a complete listing of all liabilities that will not be transferred to Central States and then assigned to Limestone. If, there are liabilities that will not be transferred, identify the responsible party for these liabilities.

Response:

- a.-d. The Director's Order has been closed. Upon request and to the extent not addressed in other responses, Cartwright Creek will describe the improvements and repairs that Cartwright Creek has completed or is in the process of undertaking in response to TDEC's concerns. The description may refer to information already provided by Cartwright Creek to the Commission.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

12. Does Cartwright Creek believe that civil penalties assessed by TDEC, like those assessed in the Director's Order attached as Exhibit CA-1, may be paid from the monies set aside in the specifically identified escrow or surcharge accounts authorized by the Commission? Provide an explanation to your answer.

Response:

No.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

13. Refer to Petition of Cartwright Creek, LLC to Increase Tap Fees to Address Environmental Issues Raised by the Tennessee Department of Environment and Conservation, Exhibit A, TPUC Docket No. 19-00034 (March 13, 2019). A copy is attached as Exhibit CA-2. Provide the following:
- a. The amount of escrow monies spent to date on the implementation of the CAP/ER submitted to TDEC in response to Director's Order No. WPC18-0100.
 - b. Based on the Engineering Report, Exhibit CA-2, provide the estimate of the costs for the recommendations set out on p. 14 of the report.

Response:

- a. The Directors order was dismissed in January 2021 as described in the response to question 1-11. Therefore, Cartwright Creek, LLC did not submit a CAP/ER to TDEC in response to the Directors Order. However, Cartwright Creek, LLC has spent escrow monies to improve the collection system and reduce Inflow and Infiltration (I&I) and other plant repairs. See the following response to question 1-13b.
- b. The recommendations on page 14 of Exhibit CA-2 were the basis of engineering and bid documents that were used to obtain competitive bids and retain a contractor for the repairs. The repair work was completed in early 2020 and have reduced I&I. The repairs covered by escrow monies total \$571,908.42.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

14. Refer to the Petition, Exhibit 7 (Confidential), Sales Agreement at p. 6, § 6F. Provide a list of all litigation disclosed to the buyer, Central States.

Response:

Now that the Director's Order referred to Question 11 has been closed, Cartwright Creek is aware of no pending litigation.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

15. The 2020 Cartwright Creek financial statements provided to the Commission indicate a zero value for 2020 Depreciation Expense as well as Accumulated Depreciation. The 2018 Cartwright Creek financial statements also indicate a zero value for Depreciation Expense. With respect to this account, respond to the following questions:
- a. Identify the last date Cartwright Creek recorded depreciation expense on its books.
 - b. Identify the annual depreciation expense charged in the year in which the expense was last recorded.
 - c. Provide the justification for not recording depreciation expense.
 - d. Provide the monthly accounting entries since January 2020 to record new capital expenditures associated with Plant in Service.

Response:

- a. December 31, 2010.
- b. \$24,660
- c. In 2010, it was discovered that Cartwright Creek, LLC had developed a negative rate base (Utility Plant in Service less Accumulated Depreciation less Contributions in Aid of Construction). Further, the Company's negative rate base was only exacerbated by further recording depreciation expense. As a result, Company management decided in early 2011 to cease recording depreciation expense on its books until such a time that any negative rate base was reversed.
- d. All capital expenditures since January 2020 have generally been recorded as a debit to Utility Plant in Service and a credit to Contributions in Aid of Construction. As noted in the Company's response to Item #8, the owners of Cartwright Creek, LLC have not injected any capital into the wastewater system since January 2019.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

16. State the monthly service rates currently being assessed to customers within the Hardeman Springs Subdivision. Identify the existing tariff that specifies these charges.

Response:

The monthly service rates for Hardeman Springs are included in Cartwright Creek's tariff. See the response to question 1-17.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

17. Provide a complete copy of Cartwright Creek's current tariff.

Response:

See Attachment 1-17a for a copy of Cartwright Creek, LLC's current tariff.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF
CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

ATTACHMENT 1-17A – TARIFF

Cartwright Creek

Wastewater Service Tariff

TRA #1 Rate Schedules

SCHEDULE OF RATES & CHARGES GRASSLAND SERVICE TERRITORY

Residential Monthly Wastewater Service:

1-2 Bedroom	\$42.00
2 Bedroom	\$42.00
3 Bedroom	\$46.50
4 Bedroom	\$52.00
5 Bedroom	\$55.25

Commercial Monthly Wastewater Service:

Rate per 1,000 Gallons per Month (Actual or Estimated Flow)	\$8.75
Minimum Monthly Charge	37.00

Miscellaneous Charges:

Monthly Capital Recovery Surcharge	\$7.50
Returned Check Charge	\$25.00
Disconnection Charge	\$10.00
Reconnection Charge	\$15.00
Late Payment Penalty	5.00%

All customers are also required to provide a refundable security deposit equal to twice the estimated monthly bill prior to obtaining service.

Property Owner/Builder/Developer Fees:

Residential Tap Fee	\$10,000.00
Commercial Tap Fee per Gallon per Day Peak Usage	\$14.29*
Construction Inspection Fee	\$250.00
Construction Reinspection Fee	\$50.00

A property owner, builder or developer may apply to the Company for a Service Connection to an existing wastewater treatment facility owned and operated by the Company. If acceptable to the Company, the applicant shall sign the Contracts for Service and pay the Company the required Tap Fees and other applicable fees pursuant to this Tariff.

**- Commercial Tap Fees are computed by multiplying the peak daily usage (estimated or known)*

** \$14.29 or \$10,000.00, whichever is greater.*

**SCHEDULE OF RATES & CHARGES
ARRINGTON RETREAT SERVICE TERRITORY**

Residential Monthly Wastewater Service:

All Residential Customers	\$55.25
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Commercial Monthly Wastewater Service:

Rate per 1,000 Gallons per Month (Actual or Estimated Flow)	\$8.75
Minimum Monthly Charge	37.00

Miscellaneous Charges:

Monthly Capital Recovery Surcharge	\$7.50
Returned Check Charge	\$25.00
Disconnection Charge	\$10.00
Reconnection Charge	\$15.00
Late Payment Penalty	5.00%

All customers are also required to provide a refundable security deposit equal to twice the estimated monthly bill prior to obtaining service.

Property Owner/Builder/Developer Fees:

Residential Tap Fee	\$10,000.00
Commercial Tap Fee per Gallon per Day Peak Usage	\$14.29*
Construction Inspection Fee	\$250.00
Construction Reinspection Fee	\$50.00

A property owner, builder or developer may apply to the Company for a Service Connection to an existing wastewater treatment facility owned and operated by the Company. If acceptable to the Company, the applicant shall sign the Contracts for Service and pay the Company the required Tap Fees and other applicable fees pursuant to this Tariff.

**- Commercial Tap Fees are computed by multiplying the peak daily usage (estimated or known)*

** \$14.29 or \$10,000.00, whichever is greater.*

SCHEDULE OF RATES & CHARGES HIDEAWAY SERVICE TERRITORY

Residential Monthly Wastewater Service:

All Residential Customers	\$55.25
---------------------------	---------

Commercial Monthly Wastewater Service:

Rate per 1,000 Gallons per Month (Actual or Estimated Flow)	\$8.75
Minimum Monthly Charge	37.00

Miscellaneous Charges:

Monthly Capital Recovery Surcharge	\$7.50
Returned Check Charge	\$25.00
Disconnection Charge	\$10.00
Reconnection Charge	\$15.00
Late Payment Penalty	5.00%

All customers are also required to provide a refundable security deposit equal to twice the estimated monthly bill prior to obtaining service.

Property Owner/Builder/Developer Fees:

Residential Tap Fee	\$10,000.00
Commercial Tap Fee per Gallon per Day Peak Usage	\$14.29*
Construction Inspection Fee	\$250.00
Construction Reinspection Fee	\$50.00

A property owner, builder or developer may apply to the Company for a Service Connection to an existing wastewater treatment facility owned and operated by the Company. If acceptable to the Company, the applicant shall sign the Contracts for Service and pay the Company the required Tap Fees and other applicable fees pursuant to this Tariff.

**- Commercial Tap Fees are computed by multiplying the peak daily usage (estimated or known)*

** \$14.29, or \$10,000.00 whichever is greater.*

SCHEDULE OF RATES & CHARGES HARDEMAN SPRINGS SERVICE TERRITORY

Residential Monthly Wastewater Service:

All Residential Customers	\$55.25
---------------------------	---------

Commercial Monthly Wastewater Service:

Rate per 1,000 Gallons per Month (Actual or Estimated Flow)	\$8.75
Minimum Monthly Charge	37.00

Miscellaneous Charges:

Monthly Capital Recovery Surcharge	\$7.50
Returned Check Charge	\$25.00
Disconnection Charge	\$10.00
Reconnection Charge	\$15.00
Late Payment Penalty	5.00%

All customers are also required to provide a refundable security deposit equal to twice the estimated monthly bill prior to obtaining service.

Property Owner/Builder/Developer Fees:

Residential Tap Fee	\$10,000.00
Commercial Tap Fee per Gallon per Day Peak Usage	\$14.29*
Construction Inspection Fee	\$250.00
Construction Reinspection Fee	\$50.00

A property owner, builder or developer may apply to the Company for a Service Connection to an existing wastewater treatment facility owned and operated by the Company. If acceptable to the Company, the applicant shall sign the Contracts for Service and pay the Company the required Tap Fees and other applicable fees pursuant to this Tariff.

**- Commercial Tap Fees are computed by multiplying the peak daily usage (estimated or known)*

** \$14.29 or \$10,000.00, whichever is greater.*

Cartwright Creek

Wastewater Service Tariff

TRA #2 Rules and Regulations

RULES AND REGULATIONS

Statement of Purpose

The general purposes of these rules and regulations are to establish procedures for furnishing sewerage and sewage treatment services on a uniform basis to customers within the service area boundary of Cartwright Creek, LLC.

Definition of Terms

1. Company - The word Company shall mean the Cartwright Creek, LLC.
2. Engineer - The word Engineer shall mean the consulting engineer of Cartwright Creek, LLC.
3. Customer - The word Customer shall mean any person, firm, corporation, association or government unit furnished sewerage services by the Company.
4. Property - The word Property shall mean all facilities owned and operated by the Company.
5. Commission - The word Commission shall mean the Tennessee Regulatory Authority.
6. Sewer – Piping, both gravity and pressure type, not on the customer's property, that collect and transport wastewater, including valves, manholes, access boxes, valve vaults, cleanouts, and other devices on the sewer.
7. Collection lines – See Sewer.
8. Lateral Sewer – The words Lateral Sewer shall mean the piping extending from the Collection lines to the Customer's property line (for customers with gravity only sewer connections) or to the Service Box (for customers with grinder pumps).
9. Service Box – For Customers with grinder pumps, a below ground valve assembly installed at each individual customer's property that connects to the Company's lateral sewer and where the customer's Service line is connected.
10. Service line – For customers with gravity sewer connections, the piping on the Customer's property extending from the Lateral Sewer to the customer's place of business or residence. For customer's with grinder pumps, the piping on the customer's property that connects the Grinder Pump to the Service Box, including the cleanout and connection to the pump.
11. Grinder Pump – The individual grinder pump installed at each residential or non-residential service location that receives and pumps sewage from the customer to the Company's sewer. This includes the pump, the pump sump, electrical control panel, and interconnecting wiring.
12. Residential Service - The words Residential Service shall mean the provision of wastewater service to a customer whose primary use is for the customer's personal dwelling.
13. Commercial Service – The words Commercial Service shall mean the provision of wastewater service to a customer whose primary use is for other than the customer's personal dwelling.

Authorization of Rules and Regulations

Cartwright Creek, LLC, a corporation organized and engaged in business as a public utility in the State of Tennessee under a transferred Certificate of Convenience and Necessity approved by the Tennessee Regulatory Authority on November 8, 2004, under Docket No. 04-00358, submits the following statement of its rules and regulations.

Effect of Rules and Regulations

All provisions of these rules and regulations shall be incorporated in each contract with each sewerage Customer of the Company.

Utility Items on Private Property

1. For Customers with gravity connections, the Customer shall own and maintain all piping within the residence or commercial building and exterior piping and Service Line.
2. For Customers with grinder pumps, the Customer shall own and maintain all piping within the residence or commercial building and external piping connecting to the grinder pump. The Company shall maintain the grinder pump and service line and the Customer shall be responsible for the cost of repair and maintenance of the grinder pump and service line. The Customer shall be responsible for furnishing and maintaining electrical power to the grinder pump.

Discontinuance of Service

Service under any application may be discontinued for the following reasons:

1. Non-payment of bill as hereinafter set forth.
2. For misrepresentation in the application.
3. For modifying or repairing any Property of the Company.
4. For failure to protect the connections, service lines or fixtures in good order.
5. For damaging any service pipes or any property of the Company in any way whatsoever.
6. Vacancy of premises.
7. For disconnecting or re-connecting service by any party other than a duly authorized agent of the Company without the consent of the Company.

Non-payment Penalties

A penalty of five (5%) percent of the monthly charge will be due after the 15th day of each month for which a bill has been rendered. After twenty (20) days non-payment after the first day of the month in which the bill is payable, the Company may shut-off the customer's service; provided, however, the Company will give the customer an additional fifteen (15) days' notice before discontinuation. A fee of Ten and No/100 (\$10.00) Dollars will be charged for disconnection and a Fifteen and No/100 (\$15.00) Dollars fee will be charged for re-connection of service, plus the actual cost of remedying any damage to the shut-off valve or other facilities. No service shall be turned on again if discontinued for non-payment (or any other valid reason) until all charges have been paid, including disconnection and re-connection fees.

Change in Ownership, Tenancy of Service

A new application and agreement must be made and approved by the Company on any change in ownership of property, or in tenancy, or in the service as described in the application. In the event of failure of a new owner or tenant to make such application, the Company shall have the right to discontinue service until such new application is made and approved.

Security Deposits

Each new Customer, before connection or re-connection, of the service may be required to make a refundable deposit to secure payment of sewerage bills in an amount double the monthly bill for that particular type of customer.

Engineering Materials and Construction Standards

To be provided upon written request.

Special Pretreatment Sewage Requirements

For all sewerage connections, in addition to the customary tap fees, the Company reserves the right to require any non-residential user to provide special treatment for any high strength effluent before discharge into its sewerage system. The Company may, upon the basis of recognized engineering standards and treatment costs, increase the tap fees or flat rate charges to cover the cost of treatment of high strength effluent or industrial waste, and may impose recognized engineering standards as to the maximum size of solids and constituents in such waste discharged into its sewerage system.

Additionally, if excessive volumes or high strength of sewage are received, the Company may require the Customer to monitor flow volume in order to adjust the monthly sewer service rate.

Damages

The Company shall in no event be responsible for maintaining any service line owned by the Customer, nor for damages created by sewage escaping therefrom, nor for defects in lines or fixtures on the property of the Customer. The Customer shall at all times comply with all regulations of the Tennessee Regulatory Authority, and of the Company, relating to the service lines and shall make all changes in his line required on account of grade or otherwise.

All leaks in any pipe or fixture on the premises of the Customer shall be immediately repaired. If the Customer fails to repair any such leak, the service may be discontinued until repairs are made.

Inspection

All pipes, valves and fixtures shall be subject to inspection at all reasonable hours by the Company or its duly authorized agent.

In Event of Emergency

The Company shall not be liable to the Customer for interruption of service, or for damages or inconveniences as a result of any interruption, stoppage, etc., which was beyond the reasonable control of the Company.

Extension Plan

The Company may furnish sewer services to additional property owners. The sewer service charges and tap fees identified in the Company's Tariff do not include costs for constructing new sewers. Any collector and/or lateral sewers required to service such properties shall be constructed at the cost of those parties desiring same, and these sewers shall become the property of the Company, to be credited to the account for contributions in aid of construction.

Contracts for Service

Each Customer before installation of service shall be required to execute on the appropriate forms furnished by the Company:

1. A sewer service contract.
2. The application and contract for sewer tap services (when applicable).

Cartwright Creek
Wastewater Service Tariff
TRA #2 – Rules & Regulations

Original Sheet #2-4
Effective Date: January 1, 2017

Customer Billing Forms

All customer billings shall be on a standard form whether residential, commercial or industrial.

Public Contact

Billing:

Cartwright Creek, LLC
Bruce Meyer
1551 Thompson's Station Road West
Thompson's Station, TN 37179
615-261-8615

Plant Operations:

Cartwright Creek, LLC
Bruce Meyer
1551 Thompson's Station Road West
Thompson's Station, TN 37179
615-261-8600

Tennessee Regulatory Authority Regulations

The utility in its operation shall conform with all the applicable rules and regulations promulgated from time to time by the Tennessee Regulatory Authority.

Returned Checks

Any Customer whose personal check is returned by the bank shall pay the Company an additional fee of \$25.00, which will be clearly indicated on the bill.

Payment Plans

The Company offers each customer the opportunity to resolve any past due balances to avoid "Non-payment Penalties". Customer may pay a past due bill, including returned check fees and other charges, disconnection and reconnection charges in a payment plan over a three to six-month billing cycle. Customers that desire to take advantage of this plan should submit their written request to the Company's business office.

If service has been disconnected, service will be reconnected within 2 days of receiving the first payment. The Company will offer one such payment plan within a full calendar year.

In the event that a customer on a payment plan fails to pay a monthly installment as per the terms of the plan and is more than fifteen (15) business days late on any payment, then the customer's service is subject to disconnection and all past due charges in addition to disconnect/reconnect fees would become due and payable prior to having service restored.

Alternative Address Notification

Customers can provide an alternative address for notification for potential disconnection that will also receive the required notices of disconnection. Customers shall submit alternative notification requests to the Company in writing.

Cartwright Creek, L.L.C.
1551 Thompson's Station Road West
Thompson's Station, TN 37179
615-261-8600

SEWER SERVICE CONTRACT

_____ Number of Bedrooms _____ Square Feet

Responsible Party for paying the bill:

Customer Name _____

Address of Service _____

CITY	STATE	ZIP
------	-------	-----

Mailing Address (if different) _____

CITY	STATE	ZIP
------	-------	-----

Phone: Home # _____ Work # _____

Email address: _____

(Cartwright Creek does not sell or provide customer contact information to third parties.)

Contact Person (if different from Customer) _____

I hereby make application to Cartwright Creek, LLC for connection with the mains of the sewer system and agree to pay for access, tap and service fees according to prevailing rates as identified in the Company's Tariff.

The Customer understands that the Company will provide a monthly bill to the Customer for sewerage services furnished. A penalty provision of five (5%) percent of the monthly charge applies to all bills after the 15th day of each month for which a bill has been rendered and will give the Company the right to collect such penalty. The failure to pay said bill the 20th day of the month following said bill will give the Company the immediate right to discontinue the furnishing of service, or to enforce a lien against the applicant's property. The Customer understands and acknowledges that failure to pay the monthly service or other charges when due may result in a lien against his property. If the Customer elects to terminate service, such termination shall be done by written notice to the Company 30 days prior to the requested termination date.

I understand that all service is subject to the rules and regulations of Cartwright Creek, LLC tariff, which may be amended from time to time and that these rules and regulations are part of this agreement.

Date _____ Signed _____

Contract approved and issued:

Date _____ By _____ Cartwright Creek, LLC

Office Use Only:

Account # _____

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

18. Provide a copy of the Sewer and Wastewater Treatment System Service Agreement between Propst Hardeman Springs, LLC and Cartwright Creek, LLC dated October 24, 2018.

Response:

See Confidential Attachment 1-18a for a copy of the Sewer and Wastewater Treatment System Service Agreement.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF
CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

ATTACHMENT 1-18A – SERVICE AGREEMENT

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

Confidential

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

19. State whether Cartwright Creek holds a deed for the land, the treatment system and drip fields, and title to the wastewater treatment and collection system at the Hardeman Springs subdivision.

Response:

Cartwright Creek has fee simple title interest in all of the properties it services.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

Question:

20. With respect to amounts classified as Account 235 – Customer Deposits reflected in the Cartwright Creek 2020 annual report, respond to the following:
- a. Provide a comprehensive explanation of the nature of the amounts identified in Account 235 – Customer Deposits.
 - b. Indicate whether it is the intent of Cartwright Creek to transfer these amounts to the buyer at the date of the transaction along with sufficient details to identify the customer associated with their deposit.
 - c. Provide a comprehensive explanation for the change in balances in Account 235 from \$214,000 at December 31, 2019 to \$38,000 at December 31, 2020. Provide the amount collected from customers and returned to customers within this response.

Response:

- a. Strictly speaking, Cartwright Creek, LLC has no Customer Deposits in the traditional sense. However, the Company does have a monthly Capital Improvement Surcharge (CIS) of \$7.50 that is recorded as a Customer Deposit since it represents a customer liability until an expenditure is authorized by the Commission.
- b. Cartwright Creek expects the Commission to determine how any remaining balance in the Capital Improvement Surcharge account should be dealt with by Limestone if the acquisition transaction proposed in this case is approved.
- c. As mentioned in Item 1-20a above, the Customer Deposit balance represents the accumulated funds from the \$7.50 CIS surcharge approved by the Commission. During 2020, a payment was made to Insituform Technologies for \$233,598 for repair of the Grassland collection system (Sewer Rehab Project #250408). This payment was funded primarily from a \$213,590 withdrawal from the CIS reserve.

CARTWRIGHT CREEK, LLC
DOCKET NO. 21-00053 – LIMESTONE PURCHASE OF CARTWRIGHT CREEK, LLC
FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE

21. Refer to the Petition, Exhibit 16. Only one TDEC permit is provided in the Petition, and it is for the system at the Hardeman Springs Subdivision (SOP-17002). Provide copies of the permits for the other three systems at issue with this Petition.

Response:

Copies of the permits can be found on the TDEC Water Resources Permits Dataviewer at:

Grasslands:

https://dataviewers.tdec.tn.gov/pls/enf_reports/f?p=9034:34031::::34031:P34031_SITE_ID:5217

Arrington Retreat:

https://dataviewers.tdec.tn.gov/pls/enf_reports/f?p=9034:34031::::34031:P34031_SITE_ID:11840

Hideaway/Troubadour:

https://dataviewers.tdec.tn.gov/pls/enf_reports/f?p=9034:34031::::34031:P34031_SITE_ID:34452

Hardeman Springs:

https://dataviewers.tdec.tn.gov/pls/enf_reports/f?p=9034:34031::::34031:P34031_SITE_ID:112627