

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>APPLICATION OF LIMESTONE</b>	)	
<b>WATER UTILITY OPERATING</b>	)	
<b>COMPANY, LLC FOR AUTHORITY TO</b>	)	
<b>SELL OR TRANSFER TITLE TO THE</b>	)	<b>DOCKET NO. 21-00055</b>
<b>ASSETS, PROPERTY AND REAL</b>	)	
<b>ESTATE OF A PUBLIC UTILITY AND</b>	)	
<b>FOR A CERTIFICATE OF</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	
	)	

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**CONSUMER ADVOCATE’S FIRST SET OF DISCOVERY REQUESTS  
TO LIMESTONE WATER UTILITY OPERATING COMPANY, LLC**

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Pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11, the Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney (the “Consumer Advocate”), by and through counsel, propounds the following discovery requests to Limestone Water Utility Operating Company, LLC (“Limestone” or the “Company”) and its parent company, Central States Water Resources, Inc. (“CSWR”).

The Company shall serve full and complete responses in accordance with the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o James P. Urban, on or before 2:00 p.m. (CDT), June 8, 2022.

**PRELIMINARY MATTERS AND DEFINITIONS**

1.     **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.

2.     **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3.     **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4.     **Objections.** If any objections to this discovery are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5.     **Singular/Plural.** The singular shall include the plural, and vice-versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) "You," "Your," "Company," "Buyer," or "Limestone," shall mean Limestone Water Utility Operating Company, LLC and all employees, agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

(b) "Central States Water" or "CSWR" shall mean Central States Water Resources, Inc. and all employees, agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

(c) "Shiloh Falls" or "Seller" shall mean Shiloh Falls Utilities, Inc. and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(d) "Affiliate" shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater clarification, "control" is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term "Affiliate" shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an "Affiliate."

(e) "Communication" shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings and personal conversations, or otherwise.

(f) "Document" shall have the broadest possible meaning under applicable law. "Document" shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph,

videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made.

(g) "Person" shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(h) "Identify" with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person's relationship, whether business, commercial, professional, or personal with you;
  - ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);
  - iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
  - iv. Any oral communication, means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.
- (i) "And" and "or" shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.
- (j) "Including" shall be construed to mean including but not limited to.

**FIRST SET OF DISCOVERY REQUESTS**

**1-1.** Refer to the *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 Public Convenience and Necessity* ("Petition")<sup>1</sup> at Exhibit 7, the Sale Agreement. Provide a comprehensive explanation indicating how the purchase price was determined. Include within the response all analytical support, workpapers, and other supporting documents used to calculate and negotiate the purchase price contained within the Exhibit.

**RESPONSE:**

**1-2.** Refer to the Petition at Exhibit 7, the Sale Agreement, at Page 5. Provide an estimate of expenses for both the services of the surveyor and the cost of the easement. Additionally, indicate whether it is the intention of Limestone to recover these expenses from ratepayers in a future docket.

**RESPONSE:**

**1-3.** Refer to the Petition at Exhibit 11 (Confidential), which contains a pro-forma balance sheet and income statement. Provide a pro-forma balance sheet separating balances by system.

**RESPONSE:**

**1-4.** Refer to the Petition at Exhibit 11 (Confidential), which contains a pro-forma balance sheet and income statement. Provide a pro-forma income statement separating balances by system.

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<sup>1</sup> *Petition*, TPUC Docket No. 21-00055 (May 17, 2021).

**RESPONSE:**

- 1-5.** Provide a pro-forma projected income statement for the Shiloh Falls wastewater system for the years 2023 through 2025.

**RESPONSE:**

- 1-6.** Provide the projected accounting entries to be added to the books of Limestone to record the Shiloh Falls acquisition based upon applicable Shiloh Falls balances as of December 31, 2020, and reconciled with the purchase price.

**RESPONSE:**

- 1-7.** Refer to Pages 5–6 of the Petition. Provide a detailed cost estimate of the anticipated repairs, upgrades, and/or replacements discussed on these pages.

**RESPONSE:**

- 1-8.** Before entering into the purchase agreement with Shiloh Falls, did Limestone (including affiliates) review the accounting practices and records of Shiloh Falls? If so, what steps did Limestone undertake to review such documents and practices?

**RESPONSE:**

- 1-9.** Does Limestone contend that Shiloh Falls' historic accounting practices and records provide sufficient information from which a reasoned determination can be made as to the prudence of acquiring the system?

**RESPONSE:**

**1-10.** Will Limestone seek to reserve the opportunity to modify any historical account balances of Shiloh Falls as a result of any prospective review of its accounting practices?

**RESPONSE:**

**1-11.** Confirm that notwithstanding any language in the Sales Agreement, Limestone intends to carry over the balance of Contributions in Aid of Construction from Shiloh at the date of closing and incorporate this balance into that of Limestone.

**RESPONSE:**

**1-12.** Confirm that Limestone intends to maintain separate accounting records for the Shiloh system such that the assets, liabilities, revenues, and expenses incurred in operating the system will be separately identifiable from the financial results of other Limestone operating systems.

**RESPONSE:**

**1-13.** Shiloh Falls does not report Income Tax Expense within its TPUC annual report. Estimate the Income Tax Expense that will be incurred by the Limestone – Shiloh Falls system for the 2023–2025 period.

**RESPONSE:**

**1-14.** Refer to Page 9 of the Petition, which states that the provision of services by Limestone will not adversely impact the availability of affordable utility service. With respect to this statement, respond to the following:

- a. Provide all underlying supporting information that leads Limestone to conclusion that affordability of utility service will not be adversely impacted as a result of this acquisition; and

- b. How does Limestone define affordable utility service, and over what time frame does this statement apply?

**RESPONSE:**

- 1-15.** Refer to the testimony of Limestone's witness Josiah Cox at Page 10 of Exhibit 9 to the Petition, wherein Mr. Cox discusses to the hiring of a non-affiliated, third-party O&M firm to provide services at the former Aqua system. Provide the following:
- a. A copy of the contractual agreement with the referenced third-party firm; and
  - b. The monthly O&M costs incurred by the Aqua system associated with these third-party services since the date Limestone acquired the system.

**RESPONSE:**

- 1-16.** Refer to the testimony of Limestone's witness Josiah Cox at Page 13. Provide an estimate of Shiloh Falls' anticipated capital expenditures by project to be made in the 2023–2025 period.

**RESPONSE:**

- 1-17.** Counsel associated with Farris Bobango PLC represented to the Consumer Advocate that the firm will represent both parties—the buyer and the seller—in this Docket. Will attorneys' fees and costs be billed separately for each party?

**RESPONSE:**

- 1-18.** Provide a statement detailing how attorneys' fees and costs are recorded for each party and provide the total attorneys' fees and costs incurred to date for each party. This is an ongoing request and should be updated by the 15<sup>th</sup> of every month covering the prior month's regulatory expenses.

**RESPONSE:**



**1-19.** Refer to Page 5 of Exhibit 7 to the Petition (the Sales Agreement). Provide the following:

- a. A detailed list of the real property owned by the Shackelford Company that will be conveyed to Limestone;
- b. A narrative response detailing why the Shackelford Company was in possession of some of the assets necessary to provide wastewater service to this community; and
- c. A statement of whether either party is compensating the Shackelford Company for the transfer of these assets, beyond the stated purchase price.

**RESPONSE:**

**1-20.** Refer to Section 6.B. on Page 5 of Exhibit 7 to the Petition (the Sales Agreement). Section 6.B. 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 May 28, 2021, and on September 27, 2021, the Tennessee Department of Environment and Conservation ("TDEC") issued Notice of Violations ("NOVs") identifying multiple deficiencies in the wastewater treatment process. The NOVs are attached to this request as Exhibits 1 and 2, respectively. In reference to these NOVs, respond to the following:

- a. Before receiving this request, was Limestone aware of the NOVs?
- b. If Limestone was aware, were these deficiencies considered during the sales negotiations? Additionally, reconcile the listed deficiencies with the anticipated repairs/upgrades/replacements projects mentioned on marked Pages 5 and 6 of the Joint Petition and provide cost estimates?
- c. During the period leading up the signing of the Sales Agreement, did a representative of Limestone or CSWR ever physically visit the wastewater treatment facilities of Shiloh Falls?
- d. The NOV states that "there is clear evidence to indicate that the existing spray field is not sufficiently sized to allow for the disposal of the volumes of water being applied." Is it Limestone's intention to secure more land for the drip field? Has land already been acquired to remedy this issue?
- e. Provide a comprehensive explanation identifying what portion (if any) of the findings in the NOV(s) will 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 Shiloh Falls to Central States and then assigned to Limestone and an identification of the financial implications of this distinction.

**RESPONSE:**

**1-21.** Refer to the Petition, Exhibit 7, Sales Agreement at Page 3, § 4. The Agreement is dated October 31, 2018, approximately three and a half years ago. Have there been any material changes to the terms of that agreement, including the purchase price? If yes, list the change(s) and explain the justification for the change(s). If no, admit that all of the terms of the parties' agreement remain as set forth in the Sales Agreement (Exhibit 7 to the Petition).

**RESPONSE:**

**RESPECTFULLY SUBMITTED,**

/s/ James P. Urban

JAMES P. URBAN (BPR No. 033599)

Deputy Attorney General

KAREN H. STACHOWSKI (BPR No. 019607)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Financial Division, Consumer Advocate Unit

P.O. Box 20207

Nashville, Tennessee 37202-0207

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Email: [james.urban@ag.tn.gov](mailto:james.urban@ag.tn.gov)

Email: [karen.stachowski@ag.tn.gov](mailto:karen.stachowski@ag.tn.gov)

*In re: Limestone / Shiloh Falls*

TPUC Docket No. 21-00055

Consumer Advocate's First Discovery Requests to Limestone/CSWR

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail, with  
a courtesy copy by electronic mail, upon:

Limestone Water Utility Operating Company, LLC

C/O Charles B. Welch, JR., Esq.

Tyler A. Cosby, Esq.

Farris Bobango PLC

414 Union Street, Suite 1105

Nashville, TN 37219

Email: [cwelch@farris-law.com](mailto:cwelch@farris-law.com)

Email: [tcosby@farris-law.com](mailto:tcosby@farris-law.com)

On this the 25th day of May 2022.

/s/ James P. Urban  
JAMES P. URBAN  
Deputy Attorney General



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
1625 HOLLYWOOD DRIVE  
JACKSON, TENNESSEE 38305-4316  
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (431) 661-6283**

Certified Mail Receipt # 7018 0040 0000 6354 9481

May 28, 2021

Ms. Lisa S. Thomas  
Owner Shiloh Falls Utilities, Inc.  
e-copy: [lisa.thomas@sfdcares.com](mailto:lisa.thomas@sfdcares.com)  
450 Church Street  
Savannah, TN 38372

**RE: Notice of Violation/Compliance Review Meeting Request**  
State Operating Permit No. SOP-94011  
Shiloh Falls Utilities, Inc.  
Pickwick Dam/Counce, Hardin County, Tennessee

Dear Ms. Thomas:

On May 12th, 2021, Bradley Smith, a representative of the Tennessee Department of Environment and Conservation, Division of Water Resources (The Division), performed a routine compliance evaluation inspection (CEI) at the above referenced facility in order to evaluate compliance with your State Operating Permit (SOP). The Division thanks contract operator Virgil Morris for his time and assistance. Please see the sections below for details regarding the inspection.

**I. Permit**

This permit covers the collection system, lagoons, UV disinfection and fenced spray irrigation system located at latitude 35.030556 and longitude -88.229167 in Hardin County, Tennessee to serve approximately 259 homes in the Shiloh Falls Utilities, Inc, in the Pickwick Dam/Counce area. The design capacity of the system is .055 MGD.

**II. Records/Reports**

A review of the facility's self-monitoring was performed. Monitoring records were available upon request, complete and current. Laboratory data from 2020 were traced through the process from generation to final reporting and found to be complete and without error.

**III. Facility Site Review, Self-Compliance Program, Operations & Maintenance, and Sanitary Sewer Overflows**

The wastewater treatment process is described as a 2-celled lagoon, pressure filtration, UV disinfection and a holding pond. Disposal of treated wastewater is by spray irrigation to a fenced area located adjacent

Notice of Violation/Compliance Review Meeting Request  
Shiloh Falls Utilities, Inc.  
05/28/21  
Page 2

to the wastewater treatment plant (WWTP) at latitude 35.030556 and longitude -88.229167 in Hardin County, Tennessee. No wastewater discharge is allowed.

Four deficiencies were documented during the inspection:

1. The UV/Filter Building at the WWTP is dilapidated. Its condition is such that the structure appears to be very unsafe and is likely inadequate for providing protection from the elements for valuable treatment infrastructure.
2. There were no signs posted for the wastewater disposal field as required by Part III, Section B of your permit.
3. Although the collection system itself was not evaluated as part of this inspection, the Division was notified via a complaint of an overflow at the Roberts Lane pump station during the time of site visit. Please be advised that sewer system overflows are prohibited. Details are available in Part II, Section C. 3 of your permit.
4. There was a broken lateral line in the spray field area. (This item was promptly corrected by Mr. Lynn Baker of D and K Construction upon notification.)

One violation was documented during the inspection:

1. There is clear evidence to indicate that the existing spray field is not sufficiently sized to allow for the disposal of the volume of water being applied. In addition to the site observations showing evidence of ponding, runoff and dead or dying vegetation there are historical records showing that the spray field, which is currently being used as the sole disposal area, was originally proposed for secondary use only. The engineering report from F & M Consulting Inc. (February 2003) proposed this site for a maximum of 25,000 gallons per day (gpd). Flow values reported over the past 12 months and the estimate given on your application for permit renewal, dated April 14<sup>th</sup>, 2021, greatly exceed the disposal area's capacity for hydrologic absorption and very likely exceed its nutrient uptake ability as well.

Ponding resulting in the discharge of treated wastewater into Waters of the State or to locations where it is likely to move to Waters of the State are considered a violation of your SOP.

#### **IV. Flow Measurement**

The flow to the disposal field is measured by a "water-type" meter.

#### **V. Laboratory**

All monitoring parameters required by the SOP are being subcontracted to Waypoint Analytical in Jackson, TN. The subcontract laboratory was not evaluated as part of this inspection.

#### **VI. Sludge Handling/Disposal (or Biosolids Handling/Disposal)**

No sludge removal has been necessary to date.

Notice of Violation/Compliance Review Meeting Request  
Shiloh Falls Utilities, Inc.  
05/28/21  
Page 3

#### **VII. Required Actions**

Please implement measures to correct the deficiencies listed in Section III as soon as practicable. **As a result of the overloaded spray field a Compliance Review Meeting (CRM) has been scheduled for June 22, 2021 at 9:00am in the Jackson Environmental Field located at 1625 Hollywood Drive, Jackson TN to discuss the violation and corrective actions.** Please bring any documents, records or representatives with you that would be beneficial to this meeting. Until such time as corrective actions are discussed and approved by the Division and successfully implemented any and all practical means should be used to eliminate the unpermitted discharge of treated wastewater to Waters of the State.

#### **VIII. Conclusion**

Compliance with your SOP requirements helps ensure the protection of downstream fish and aquatic life and water quality. Your efforts will help ensure permit compliance and protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 571-7790 or via email at [Conner.Franklin@tn.gov](mailto:Conner.Franklin@tn.gov) or Brad Smith at (731)-234-1408 or at [Bradley.E.Smith@tn.gov](mailto:Bradley.E.Smith@tn.gov).

Sincerely,

A handwritten signature in cursive script that reads "Conner Franklin".

Conner Franklin  
Environmental Field Office Manager  
Division of Water Resources  
Jackson Environmental Field Office

cc: Bradley Smith, Environmental Consultant I, JEFO (via email)



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
1625 HOLLYWOOD DRIVE JACKSON, TENNESSEE 38305-4316  
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283

### Image Log

**DATE:** 05/13/21

**Site:** Shiloh Falls Utilities – SOP-94011

**Personnel Present:** Bradley Smith

**Subject:** Compliance Evaluation Inspection



Image 1 – Property Aerial





Image 2 - WebSoil Aerial (See Figure 1 below for High Intensity Soils Map)





Image 3 - Primary Lagoon



Image 4 - Secondary Lagoon





Image 5 - Filter Backwash Basin





Image 6 - Holding Lagoon



Image 7 - Sand Filter and UV System Building





Image 8 - UV System (Lower Left)





Image 9 - Channel indicating runoff on SE side of spray field.





Image 10 - Same channel as above with different aspect.





Image 11 - Broken spray field lateral. (Promptly repaired upon notification.)





Image 12 - Evidence of wastewater migration pathway at head of exclusion zone on South side of fenced area.





Image 13 - Area where wastewater has clearly been ponding.





Image 14 - Braided migration pathway on SW side of spray field at perimeter fence.





Image 15 - More evidence of offsite migration at perimeter fence.



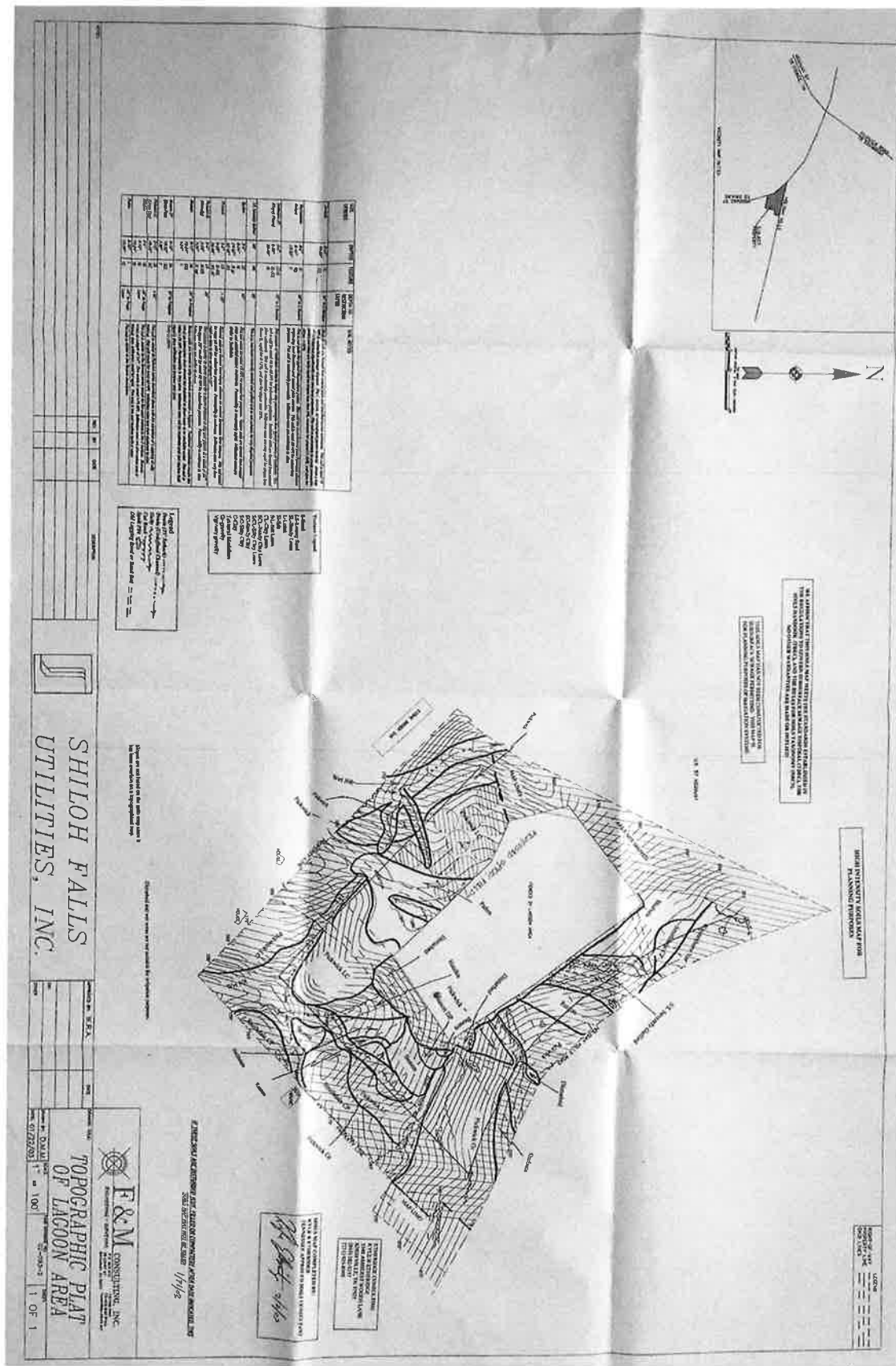


Figure 1 - High Intensity Soils Map from February 2003 Engineering Report "Proposed Secondary Spray Irrigation Field"



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
1625 HOLLYWOOD DRIVE  
JACKSON, TENNESSEE 38305-4316  
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (431) 661-6283**

Certified Return Receipt #: 7020 2450 0002 2246 5418

September 27, 2021

Ms. Lisa S. Thomas  
Owner Shiloh Falls Utilities, Inc.  
e-copy: [lisa.thomas@sfdcares.com](mailto:lisa.thomas@sfdcares.com)  
450 Church Street  
Savannah, TN 38372

**RE: Notice of Violation/Compliance Review Meeting**  
State Operating Permit No. SOP-94011  
Shiloh Falls Utilities, Inc.  
Pickwick Dam/Counce, Hardin County, Tennessee

Dear Ms. Thomas:

On September 14, 2021 Tennessee Department of Environment and Conservation, Division of Water Resources (The Division), received a complaint regarding excessive algal growth in Houston Branch downstream of Old Hwy 57 in Counce, Hardin County, Tennessee.

On September 14 and 17, 2021 a member of the Division investigated the complaint. It was determined that excessive algal growth (eutrophication) was occurring in an unnamed tributary (UNT) to Houston Branch and in Houston Branch below the confluence with the UNT. The UNT was later evaluated to identify upstream sources of potential nutrient enrichment. On Friday, September 17 an unpermitted discharge from the Shiloh Falls Utilities Spray Irrigation Disposal Field was observed. The treated wastewater was found to be flowing under Hwy 57 migrating eastward. The migration pathway was followed roughly 1250 feet downstream to a point near the confluence with the Houston Branch UNT. No other sources of potential nutrient enrichment were identified.

**Please be advised that the discharge of treated wastewater into waters of the state or to locations where it is likely to move to Waters of the State is a violation of your state operating permit.**

In addition, following the Notice of Violation issued May 28, 2021 and the subsequent Compliance Review Meeting on June 22, 2021 a Corrective Action Plan (CAP) was to be submitted to this office within 45 days of that meeting. To date a CAP has not been received.

**As a result of this continued discharge and non-receipt of a CAP, a second Compliance Review Meeting has been scheduled for Thursday, October 14, 2021 at 10:00am at the Jackson Environmental Field Office located at 1625 Hollywood Drive, Jackson, TN 38305.**

**Exhibit 2**

NOV/Compliance Review Meeting

Shiloh Falls Utilities, Inc.

09/27/21

Page 2

If I may be of assistance in matters concerning this notice, please contact me via telephone at (731) 571-7790 or via email at [conner.franklin@tn.gov](mailto:conner.franklin@tn.gov) or Brad Smith at (731-234-1408 or at [Bradley.E.Smith@tn.gov](mailto:Bradley.E.Smith@tn.gov).

Sincerely,

A handwritten signature in blue ink that reads "Conner Franklin". The signature is written in a cursive, flowing style.

Conner Franklin  
Environmental Field Office Manager  
Division of Water Resources  
Jackson Environmental Field Office

cc: Mr. Gil Parish, ([parrishgil@gmail.com](mailto:parrishgil@gmail.com))  
Mr. Lannie Hutton ([lanniehutton@gmail.com](mailto:lanniehutton@gmail.com))  
Bradley Smith, Environmental Consultant I, JEFO ([bradley.e.smith@tn.gov](mailto:bradley.e.smith@tn.gov))