

STATE OF TENNESSEE

Office of the Attorney General



HERBERT H. SLATERY III

June 28, 2022

Electronically Filed in TPUC Docket
Room on June 28, 2022 at 9:22 a.m.

Chairman Kenneth Hill
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, 4th Fl.
Nashville, TN 37243

RE: Docket No. 21-00055, *Application of Limestone Water Utility 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.*

Dear Chairman Hill:

Filed herewith are the Consumer Advocate's Second Set of Discovery Requests to each of the joint petitioners in the above-referenced docket.

On Wednesday, June 22, 2022, the parties convened for an informal discovery meeting, after which on June 23, 2022, the Consumer Advocate sent follow-up and clarifying requests by email to counsel for joint petitioners. The questions in the Consumer Advocate's Second Set of Discovery Requests are virtually identical to those sent by email to Joint Petitioners on June 23, 2022. In accordance with the procedural schedule, the Consumer Advocate believed it prudent to also file and serve these requests as formal discovery requests.

Please let me know if you have any questions. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim P. Urban".

James P. Urban

Deputy Attorney General

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

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

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

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), July 1, 2022. The Preliminary Matters and Definitions set forth in the Consumer Advocate’s First Set of Discovery Requests are hereby integrated as if fully restated herein.

SECOND DISCOVERY REQUESTS

2-1. In reference to Limestone's response to DR 1-3, is page 1 intended to be the pro-forma balance sheet for Shiloh Falls system post-acquisition? Is page 2 intended to be the pro-forma balance sheet for the Limestone system post-acquisition? Finally, if page 2 was intended to be pro-forma balance sheet for Limestone acquisition reconcile it with Confidential Exhibit 11 as filed with the Company's Petition.

RESPONSE:

2-2. The pro-forma income statement Limestone provided in response to DR 1-4 lists "Year 1," "Year 2," "Year 3." Please confirm these labels are intended to correlate with the first three years of Limestone's operation of the Shiloh Falls system or explain what these labels represent.

RESPONSE:

RESPECTFULLY SUBMITTED,

/s/ James P. Urban

JAMES P. URBAN (BPR No. 033599)

Deputy Attorney General

KAREN H. STACHOWSKI (BPR No. 019607)

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In re: Limestone / Shiloh Falls

TPUC Docket No. 21-00055

Consumer Advocate's Second 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.
C/O Tyler A. Cosby, Esq.
Farris Bobango PLC
414 Union Street, Suite 1105
Nashville, TN 37219
Email: cwelch@farris-law.com
Email: tcosby@farris-law.com

On this the 28th day of June 2022.

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