

**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)	
)	

**SHILOH FALLS RESPONSE TO CONSUMER ADVOCATE'S SECOND SET OF
DISCOVERY REQUESTS**

RESPONSE TO SECOND DISCOVERY REQUESTS

2-1. In DR 1-4 to Shiloh Falls, we asked that any contributed assets be identified. In Docket No. 95-03948, the Public Service Commission issued an order on May 31, 1996, approving a settlement agreement between Shiloh Falls and the Consumer Advocate (share.tn.gov/tra/orders/1999/9503948.pdf). Paragraph 5 of the Settlement Agreement provides, "[Shiloh Falls] will book a credit of \$193,881 (half of the gross plant in service) to Other Paid in Capital in a specifically designated sub-account, Contributed Capital, in accordance with USOA. The offsetting debit will be made to owner's equity. The Contributed Capital account will be recognized as a reduction in rate base in any future proceedings." This Contributed Capital sub-account should be identified by Shiloh Falls as contributed assets in response to DR 1-4, but Shiloh Falls' original responses to that DR did not identify any contributed assets. Please supplement Shiloh Falls' response.

RESPONSE: Unfortunately, the individuals responsible for the Shiloh Falls development and the construction of the sewage treatment plant have passed away. The two individuals primarily responsible for representing the partners and the two accountants who would have been involved with the entries described in this request have also passed away. Therefore, certain information is limited. The Seller has sent this request to their current accountant and will supplement this response if the information becomes available.

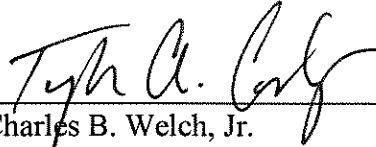
2-2. Shiloh Fall's response to DR 1-5 indicates that Shiloh Falls is collecting tap fees. What are these tap fees intended to cover?

RESPONSE: The tap fees are used to pay the contractor who actually sets the taps but does not cover any equipment such as grinder pumps.

2-3. Shiloh Falls' response to DR 1-9 indicates that there were no capital expenditures. However, the responses to DR 1-6 and DR 1-15 include items that would qualify as capital expenditures, including construction work in progress and remediations expenditures to comply with TDEC NOVs. Please supplement Shiloh Falls' response to DR 1-9 to explain this discrepancy.

RESPONSE: The utility company is owned by SPD Company, LLC, and Shackelford Development Corporation, who did not directly fund any capital expenditures during the period covered by DR 1-9. All capital expenditures during the period were made by the utility company.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "Tyler A. Cosby", is written over a horizontal line.

Charles B. Welch, Jr.

Tyler A. Cosby

Farris Bobango PLC

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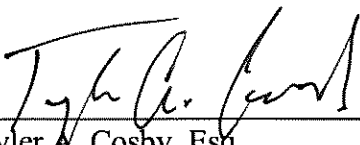
Email: cwelch@farris-law.com

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:

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On this the 29th day of June 2022.



Tyler A. Cosby, Esq.