

**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 PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	
	)	

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

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**RESPONSE TO SECOND DISCOVERY REQUESTS**

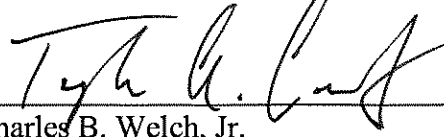
**2-1.** In reference to Limestone’s response to DR 1-3, is page 1 intended to be the pro-forma balance sheet for Shiloh Falls system post-acquisition? Is page 2 intended to be the pro-forma balance sheet for the Limestone system post-acquisition? Finally, if page 2 was intended to be pro-forma balance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

**RESPONSE:** Page 1 is the stand-alone pro-forma balance sheet for Limestone (post-acquisition but not including Shiloh Falls data) as requested in the DR. Similarly, Page 2 is the stand-alone pro-forma balance sheet for the Shiloh Falls system post-acquisition. On the other hand, Confidential Exhibit 11 is a consolidated view of Limestone post-acquisition (including Shiloh Falls data) with the Company’s most up-to-date information as of the time of filing. As such, Confidential Exhibit 11 and page 2 of the Company’s DR response are showing two separate views.

**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:** Confirmed. These labels are intended to correlate with the first three years of Limestone’s operation of the Shiloh Falls system.

**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

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**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:

JAMES P. URBAN (BPR No. 033599)  
Deputy Attorney General  
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On this the 21th day of June 2022.

  
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Tyler A. Cosby, Esq.