

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

IN RE:)	
)	
APPLICATION LIMESTONE WATER)	
UTILITY OPERAITNG COMPANY,)	
LLC FOR AUTHORITY TO PURCHASE)	
TITLE TO THE ASSETS, PROPERTY)	DOCKET NO. 21-00060
AND REAL ESTATE OF A)	
WASTEWATER SYSTEM AND FOR A)	
CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY)	
)	

**CHAPEL WOODS HOMEOWNERS ASSOCIATION
SUPPLEMENTAL RESPONSE TO CONSUMER ADVOCATE'S INFORMAL
DISCOVERY REQUESTS**

SUPPLEMENTAL RESPONSE TO DISCOVERY REQUESTS

1. Chapel Woods discusses its tap fees in response to DR 1-5. How much was collected in the form of tap fees? What costs are these tap fees was intended to cover?

Response: Tap fees collected since 2018, were \$31,250. The Tap fees were deposited to the Savings Account and used to cover repairs, maintenance, and upgrades to the sewer treatment facility and the collection system.

2. How was the replacement of the UV system identified in Chapel Woods' response to DR 1-7 funded?

Response: The UV System was purchased prior to 2018 with a secured loan against the savings account through First Commerce Bank in Chapel Hill and paid for out of the regular quarterly dues receipts. All other maintenance and upgrades expenses were paid using funds from checking to the extent possible and the balance from the savings as necessary.

3. In reference to DR 1-9 to Limestone, is page 1 intended to be the pro-forma balance sheet for Limestone post-acquisition? Is page 2 intended to be the pro-forma balance sheet for the Chapel Woods system post-acquisition? Finally, if page 1 was intended to be pro-forma balance sheet for Limestone post-acquisition, why does it differ from 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 Chapel Woods data) as requested in the DR. Similarly, Page 2 is the stand-alone pro-forma balance sheet for the Chapel Woods system post-acquisition. On the other hand, Confidential Exhibit 11 is a consolidated view of Limestone post-acquisition (including Chapel Woods 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.

RESPECTFULLY SUBMITTED,



Charles B. Welch, Jr.

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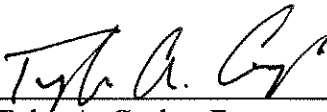
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CERTIFICATE OF SERVICE

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:

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On this the 30 th day of June 2022.



Tyler A. Cosby, Esq.