

Office of the Attorney General



Electronically Filed in TPUC Docket Room
on November 4, 2021 at 9:42 a.m.

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November 4, 2021

Charles B. Welch, Jr., Esq.
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Re: Tennessee Public Utility Commission, Docket No. 21-00060, *Application of Limestone Water Utility Operating Company, LLC for Authority to Purchase Title to the Assets, Property, and Real Estate of a Wastewater System, Chapel Woods, and for a Certificate of Public Convenience and Necessity.*

Dear Mr. Welch:

On October 20, 2021, Limestone Water Utility Operating Company, LLC ("Limestone") filed its response to the Consumer Advocate's Minimum Filing Requirements (MFR) Letter. This response addressed the Consumer Advocate's Attachment A, which discussed the MFRs for Certificate of Convenience and Necessity (CCN) set out in TPUC Rule 1220-04-13-.17. However, Limestone has not yet addressed the minimum filing requirements for an acquisition set out in TPUC Rule 1220-04-14-.08.

In Limestone's response to the Consumer Advocate's MFR Letter, Limestone provided a single-page proposed tariff (Appendix I) stating that rates will be \$29.00 per month. However, this single-page proposed tariff does not meet the requirements for *Tariff Contents* set out in TPUC Rule 1220-04-01-.03, which states:

- (1) Tariffs must explicitly state the rates and charges for each class of service rendered, designating the area or district to which they apply.
- (2) Rules and regulations of the utility that **in any manner affects the rates charged or to be charged or that define the extent or character of the service to be given** shall be included with each tariff. (emphasis added)

If there are additional pages to the single page filed on October 20, 2021, please provide a complete copy of Limestone's proposed tariff. If this is the complete proposed tariff for Chapel Woods, please provide a revised proposed tariff that addresses such terms¹ as:

- Fees for "new account"; "reconnection"; "returned check", "late fees", or "online credit card convenience".
- The grounds for service termination by utility or a process to dispute a service termination.
- The procedure that is available for a payment plan for past due bills, returned checks, or disconnect/reconnect charges.
- Emergency contact information.

The Consumer Advocate would like to thank, in advance, Limestone's attention to the Consumer Advocate's requests. If you have questions regarding this request, please contact me at (615) 741-2370.

Respectfully,



Karen H. Stachowski
Senior Assistant Attorney General

cc: TPUC Docket Manager

¹ This is not meant to be an exhaustive list of terms to be included in Limestone's proposed tariff. The Commission has previously addressed the filing of a single-page tariff in TRA Docket No. 17-00014. In that docket, the utility provided a single page tariff in its CCN Petition. The Hearing Officer suspended the docket until the utility addressed the petition's deficiencies and filed a complete proposed tariff. *Order Suspending Procedural Schedule*, p. 3, TRA Docket No. 17-00014 (June 30, 2017).