STATE OF TENNESSEE

Office of the Attorney General



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May 18, 2023

Kelly Cashman-Grams
General Counsel
c/o Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Electronically Filed in TPUC Docket Room on May 18, 2023 at 10:49 a.m.

Re: Tennessee Public Utility Commission, Docket No. 21-00086, Staff Compliance Audit of Superior Wastewater Systems, LLC's Compliance with Commission Rules 1220-04-13-.07 and 1220-04-13-.08 Regarding Financial Security and Rule 1220-04-13-.16 Regarding Affiliate Transactions

Dear Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") respectfully requests the Tennessee Public Utility Commission ("TPUC") to furnish the following records which the Consumer Advocate believes TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced docket. The records requested are as follows:

- 1. An unredacted copy of the confidential record "TPUC3-8a, page 2" provided in Superior Wastewater Systems, LLC Response to Staff's Third Discovery Request which was filed in the Docket on May 17, 2023.
- 2. All other confidential documents regarding TPUC Docket No. 21-00086 submitted to the Commission since January 24, 2023.
- 3. All non-confidential documents regarding TPUC Docket No. 21-00086 submitted to the Commission since January 24, 2023. For example, Superior Wastewater System, LLC's consultant sent a letter to the Commission on March 6, 2023 about Net Operating Losses. Although a copy of this letter was filed as Attachment TPUC3-7A in the recently filed discovery responses, the Consumer Advocate had not received a copy previously.

Thank you for your time and consideration of this request. If you have questions regarding this request, please contact me at (615) 741-2357.

Respectfully,

Mason C. Rush

Mason C. Rush

Assistant Attorney General

cc: All Parties of Record