

STATE OF TENNESSEE

Office of the Attorney General



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September 1, 2021

Jeff Ridsen
Tennessee Wastewater Systems, Inc.
851 Aviation Parkway
Smyrna, TN 37167

Re: Tennessee Public Utility Commission, Docket No. 21-00096, *Petition of Tennessee Wastewater Systems, Inc. to Amend its Certificate of Convenience and Necessity to Include Nolensville Catholic Church.*

Dear Mr. Ridsen:

The Consumer Advocate reviewed Tennessee Wastewater Systems, Inc.'s (TWSI) Petition in the above-referenced docket for compliance with the minimum filing requirements for an amendment to a Certificate of Convenience and Necessity (CCN) as set forth in Tenn. Comp. R. & Regs. 1220-04-13-.17.

The Consumer Advocate appreciates the time and effort TWSI put into compiling its Petition, as well as its attention to the Commission's minimum filing requirements. Upon review of the Petition, the Consumer Advocate could either not locate or would appreciate clarification regarding the items detailed in the attached document, Attachment A.

Thank you in advance for TWSI's attention to the Consumer Advocate's request. If you have questions regarding this request, please contact me at (615) 741-2357.

Respectfully,

Rachel C. Bowen

Rachel C. Bowen
Assistant Attorney General

cc: Patsy Fulton, TPUC
Kelly Cashman-Grams, TPUC

ATTACHMENT A

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Rule 1220-04-13-.17(2)(a) General Information

- *Rule 1220-04-13-.17(2)(a)5.* TWSI provided a copy of its Articles of Incorporation; however, this document is not sufficiently legible for review. Please resubmit a clearer version of the Articles of Incorporation.
- *Rule 1220-04-13-.17(2)(a)7 (i)-(v).* TWSI provided a map in Exhibit 7 to the Petition. The map provided is not, however, legible for review. Please resubmit a clearer version of this map. Please ensure that the resubmitted map complies with the provisions of the rules.

Rule 1220-04-13-.17(2)(b) Property Rights and Public Need

- *Rule 1220-04-13-.17(2)(b).* TWSI provided a Sanitary Sewer Service Agreement in Exhibit No. 14 to the Petition. This document is blurry and difficult to read. Please resubmit a clearer version of the Agreement.

Rule 1220-04-13-.17(2)(d) Sufficient Technical Ability

- *Rule 1220-04-13-.17(2)(d)4.* The rule requires that any complaint(s), notices of violation or administrative action filed with or issued by a regulatory agency be listed. Please indicate whether this provision is applicable or not.

Rule 1220-04-13-.17(2)(e) Sufficient Financial Ability

- *Rule 1220-04-13-.17(2)(e)9.* In accordance with the rule, please provide estimates of costs and customers added by month for the first five (5) years based upon the construction build-out schedule for developers in the service area of the proposed wastewater system. For each year, by month, provide an estimated number of customers by customer class anticipated to be served by the wastewater system. Include the utility's basis and assumptions used for this projection. Provide this information in a spreadsheet in Microsoft Excel format with all assumptions clearly documented.