

August 30, 2022

Mr Herb Hilliard, Chairman
c/o Ectory Lawless
Tennessee Public Utilities Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Electronically Filed in TPUC Docket Room on August
30, 2022 at 1:50 pm

RE: Docket No. 22-00074 – TWSI Responses to Staff Data Requests

Dear Chairman Hilliard,

The following are Tennessee Wastewater Systems, Inc's responses to Commission Staff's data requests filed in this docket on August 24, 2022.

Please let me know if I can be of any further assistance in the Commission's evaluation of this petition.

Kind regards,



Jeff Risdien
General Counsel

1. **Regarding Commission Rule 1220-04-13-.17(2)(a)(i):** Staff needs to be able to discern clearly and visually separate the areas on the map which will be: phase 1, phase 2, phase 3, phase 4, and phase 5 as well as the commercial refueling station. If higher resolution maps are available for this project, please provide a copy.

RESPONSE: See Maps 1 (phases) and 2 (service locations) attached.

2. **Regarding Commission Rule 1220-04-13-.17(2)(a)(v):** There are two parcels of private property that will be partially surrounded by the planned development. Parcel 049.00 (figure 1) is partially surrounded by the planned commercial facility. Parcel 051.00 (figure 2) is partially surrounded by parcels 048.00 and 048.01. Please discuss whether easements for private property will be necessary and, if so, how TWSI plans to negotiate these easements.

RESPONSE: The developer does not intend to cross either parcel so easements will not be necessary.

3. **Regarding Commission Rule 1220-04-13-.17(2)(b)(3):** The Sanitary Sewer Service Agreement "Sewer Agreement" executed on July 9, 2020 between TWSI and Harvester, LLC references Adenus Solutions Group, LLC as the (Contractor) for this development. This contract language appears inconsistent with the petition filed on July 22, 2022, as well as the Build Agreement executed on July 15, 2022 between Scott & Ritter, Inc. (Contractor) and Harvester, LLC (Developer). Additionally, there was difficulty in reading the Sewer Contract due to poor legibility. Please clarify this apparent inconsistency and make any necessary changes and re-submit a more legible Sanitary Sewer Service Agreement reflecting any changes.

RESPONSE: Adenus Solutions Group, was the contractor on the drip disposal system serving the development. The contract between ASG and the Developer is attached as Exhibit 3. Scott & Ritter remains the contractor for the sewer treatment system.

4. **Regarding Commission Rule 1220-04-13-.17(2)(b)(3):** The Construction Agreement for Installation of the WWTP @ Derby Meadows Coopertown ("Build Agreement") has an employee by the name of Eric Carter signing on behalf of the Contractor. Please confirm that Mr. Carter is an authorized signer regarding the financial interests and intent of Scott & Ritter, Inc?

RESPONSE: See Letter 4 attached.

5. **Regarding Commission Rule 1220-04-13-.17(2)(e)(1):** The language of this Commission rule requires the filing of a prior year-end balance sheet, income statement, and the statement of cash flows. While a balance sheet has been provided, an income statement and statement of cash flows is also needed.

RESPONSE: See attachments 5A and 5B (confidential filings).

6. **Regarding Commission Rule 1220-04-13-.17(2)(e)(6):** Please provide an estimated cost breakdown for constructing each of the five phases of the proposed development.

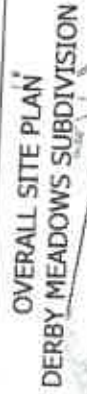
RESPONSE: The system will be constructed to serve the entire development (all phases). Final cost, including the land and collection system costs will be filed in this docket consistent with previous Commission Orders granting CCNs which have required the filing of final Contributions in Aid of Construction amounts prior to commencing service.

OVERALL SITE PLAN
DERBY MEADOWS SUBDIVISION
COOPERTOWN, TENNESSEE

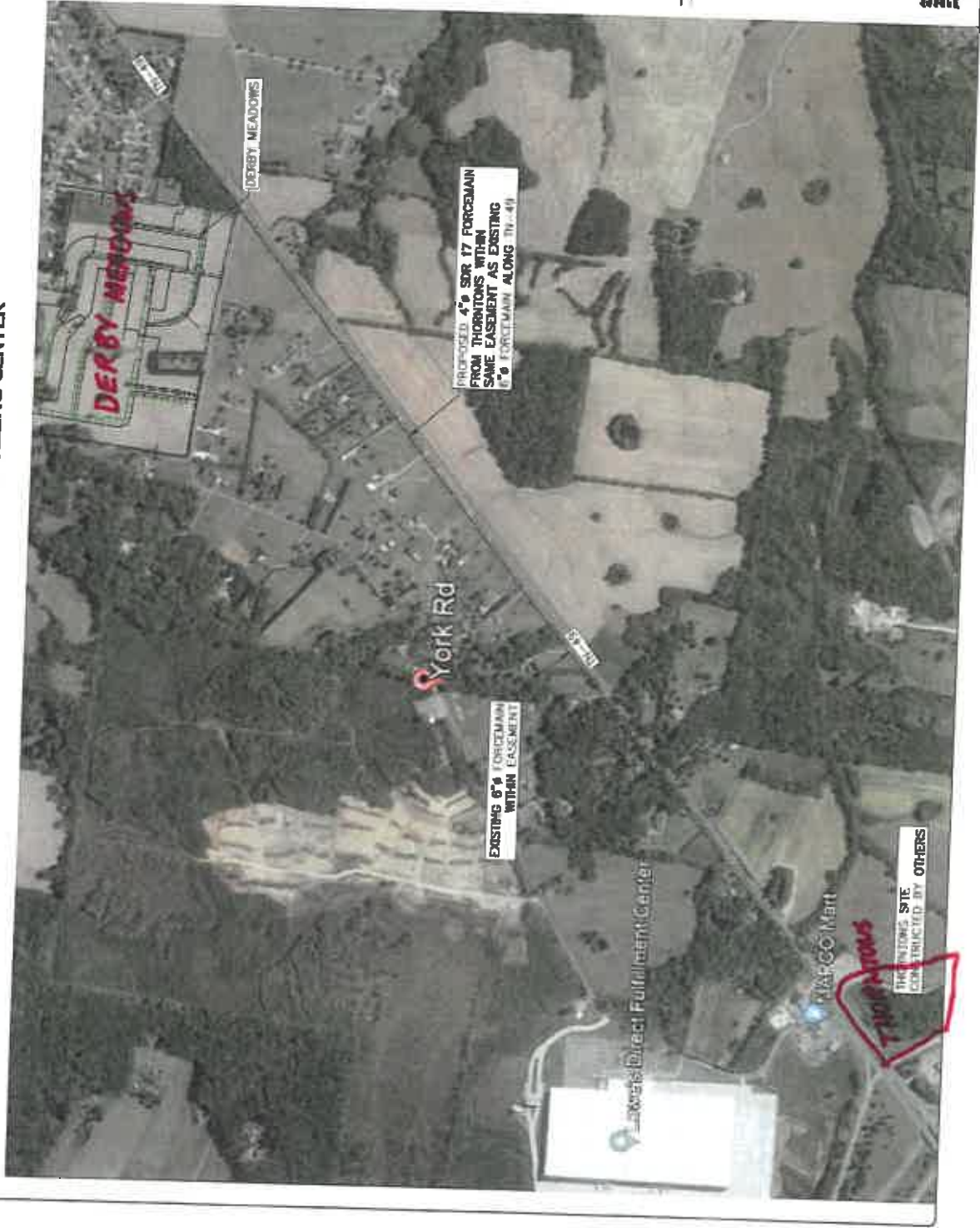


Landmark

**THE NO TIT-TESTING
-AND ONLY-
TUBING, TUBING, TUBING.**



AERIAL MAP OF DERBY MEADOWS AND THORNTONS REFUELING CENTER



CALL TENSSEEE 611
BEFORE YOU DIG
(404) 731-1111 OR 611



Landmark
SURVEYING & MAPPING
INCORPORATED
1000 N. 10TH ST.
SUITE 100
ATLANTA, GA 30309
(404) 525-1000
WWW.LANDMARKSURVEYING.COM



AERIAL MAP OF DERBY MEADOWS AND
THORNTONS REFUELING CENTER
DERBY MEADOWS SUBDIVISION
COOPERTOWN, TENNESSEE



THIS MAP WAS PREPARED BY
LANDMARK SURVEYING & MAPPING
INCORPORATED
1000 N. 10TH ST.
SUITE 100
ATLANTA, GA 30309
(404) 525-1000
WWW.LANDMARKSURVEYING.COM

2

8651-12-10-1526

CALL TENNESSEE BUI
BEFORE YOU DIG
800/251-4111 OR 615

OVERALL SITE PLAN DERBY MEADOWS SUBDIVISION



Landmark
CONSULTING GROUP
1000 N. 10TH AVE.
SUITE 100
DENVER, CO 80202
TEL: 303.733.1000
WWW.LANDMARKCG.COM



OVERALL SITE PLAN
DERBY MEADOWS SUBDIVISION
COOPERTOWN, TENNESSEE



01-21-1598

DERBY MEADOWS SUBDIVISION
COOPERTOWN, TENNESSEE
01-21-1598

Docket 22-00074 – Derby Meadows

Confidential Filing

ASG Construction Contract

SCOTT & RITTER, INC.

2385 Barren River Road
P.O. Box 749
Bowling Green, KY 42102
Tel: (270) 781-9988
Fax: (270) 782-3267
www.scottandritter.com

**Municipal • Commercial • Industrial • Highway
Heavy Civil / Utility Contracting**

August 24, 2022

Matt Nicks
Adenus Group, LLC
849 Aviation Pkwy
Smyrna, TN 37167

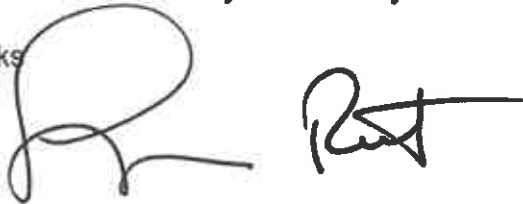
RE: Derby Meadows WWTP

Dear Mr. Nicks,

Eric Carter has authority to sign construction contracts for Scott & Ritter, Inc.

Please let me know if you need any further information.

Thanks

Two handwritten signatures are present. The first signature, on the left, is a stylized 'R' with a long horizontal stroke, likely belonging to Larkin Ritter. The second signature, on the right, is a more complex, cursive signature, likely belonging to Eric Carter.

Larkin Ritter
SCOTT & RITTER, INC. | CEO
2385 Barren River Road | Bowling Green, KY 42101
Office 270-781-9988 | Cell 270-799-0000 | Fax 270-782-3267
lr Ritter@scottandritter.com

Docket 22-00074 – Derby Meadows

Confidential Filing

Statement of Cash Flows

Docket 22-00074 – Derby Meadows

Confidential Filing

Income Statement