

# BUTLER | SNOW

May 22, 2024

**VIA ELECTRONIC FILING**

Electronically Filed in TPUC Docket  
Room on May 22, 2024 at 3:10 p.m.

Hon. Herbert H. Hilliard, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

**RE: *Expedited Joint Application of Limestone Water Utility Operating Company, LLC, and DSH & Associates, LLC, for Approval of the Acquisition of and to Operate the Wastewater System of DSH & Associates, LLC, and to Transfer or Issue a Certificate of Public Convenience and Necessity, TPUC Docket No. 23-00016***

Dear Chairman Hilliard:

Attached for filing please find Limestone Water Utility Operating Company, LLC's *Second Report Demonstrating Compliance with Filing Requirements of Order Approving Settlement Agreement and Transfer of System, and Granting Certificate of Convenience and Necessity* in the above-captioned matter.

As required, the original plus four (4) hard copies will be mailed to your office. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Sincerely,

BUTLER SNOW LLP



Katherine Barnes

clw

Attachments

cc: Doug Hodge, DSH & Associates  
Russ Mitten, Limestone Water Utility Operating Company  
Shilina B. Brown, Consumer Advocate Division  
Victoria B. Glover, Consumer Advocate Division

*The Pinnacle at Symphony Place  
150 3<sup>rd</sup> Avenue South, Suite 1600  
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BUTLER SNOW LLP

87908409.v1

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

**IN RE:** )  
 )  
**EXPEDITED JOINT APPLICATION** )  
**OF LIMESTONE WATER UTILITY** )  
**OPERATING COMPANY, LLC, AND** )  
**DSH & ASSOCIATES, LLC, FOR** )  
**APPROVAL OF THE ACQUISITION** )  
**OF AND TO OPERATE THE** )  
**WASTEWATER SYSTEM OF DSH &** )  
**ASSOCIATES, LLC, AND TO** )  
**TRANSFER OR ISSUE A** )  
**CERTIFICATE OF PUBLIC** )  
**CONVENIENCE AND NECESSITY** )

**DOCKET NO. 23-00016**

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**SECOND REPORT DEMONSTRATING COMPLIANCE WITH FILING  
REQUIREMENTS OF ORDER APPROVING SETTLEMENT AGREEMENT AND  
TRANSFER OF SYSTEM, AND GRANTING CERTIFICATE OF CONVENIENCE  
AND NECESSITY**

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On December 26, 2023, the Tennessee Public Utility Commission (“Commission” or “TPUC”) issued its *Order Approving Settlement Agreement and Transfer of System, and Granting Certificate of Convenience and Necessity* (“Order”). In the Order, the Commission approved the *Stipulation and Settlement Agreement* entered into by Limestone Water Utility Operating Company, LLC (“Limestone”), DSH & Associates, LLC (“DSH”), and the Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”).<sup>1</sup> The Order requires Limestone to file certain documents with the Commission, specifically outlined in paragraphs 3, 8, 10, and 13 through 20.<sup>2</sup> On February 22, 2024, Limestone filed its first *Report Demonstrating Compliance with Filing Requirements of the Order*, which included all documents required to be

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<sup>1</sup> *Order Approving Settlement Agreement and Transfer of System, and Granting Certificate of Convenience and Necessity*, p.14, TPUC Docket No. 23-00016 (Dec. 26, 2023).

<sup>2</sup> *Id.*, p. 5-8. See also *Stipulation and Settlement Agreement*, p. 3-7, TPUC Docket No. 23-00016 (Sept. 25, 2023).

filed with the Commission except the copies of maps and engineering designs for the wastewater system, as required by Paragraph 20 of the Order. Therefore, Limestone hereby files, as **Exhibit 1** to this second report, **copies of maps and engineering designs for the wastewater system** within 30 days of availability. Limestone has fully complied with the compliance filing terms of the Order.

Respectfully submitted,

BUTLER SNOW LLP



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Melvin Malone  
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COUNSEL FOR LIMESTONE WATER UTILITY  
OPERATING COMPANY, LLC

# **EXHIBIT 1**

# LAFOLLETTE UTILITIES BOARD

CAMPBELL COUNTY, TENNESSEE

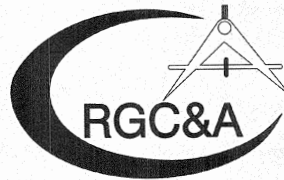
## SANITARY SEWER SYSTEM FOR LAKESIDE ESTATES



LOCATION MAP

APPROVED BY:

*Eddie W. Troxell*  
EDDIE TROXELL  
SUPERINTENDENT OF WATER OPERATIONS  
LAFOLLETTE UTILITIES BOARD

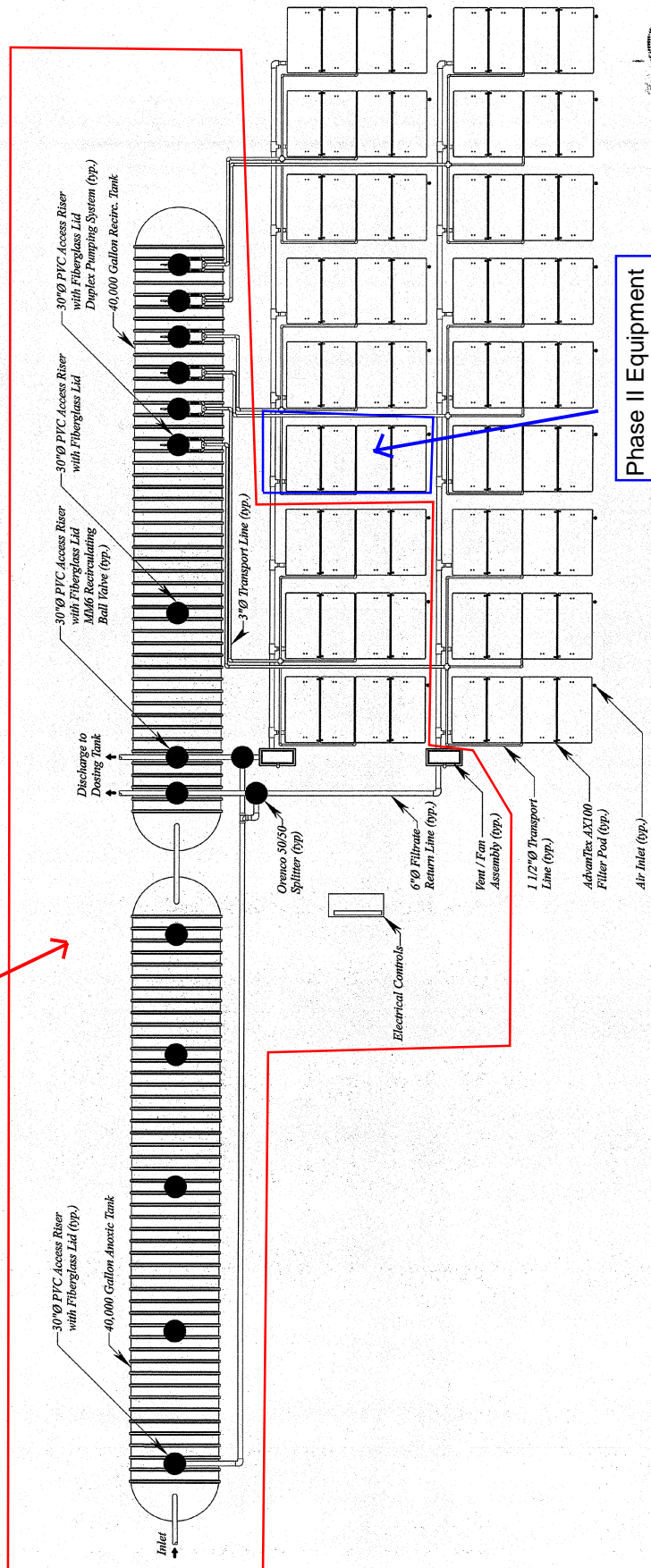


ROBERT G. CAMPBELL & ASSOCIATES, L.P.  
CONSULTING ENGINEERS  
KNOXVILLE, TENNESSEE




Phase I Equipment

Phase II Equipment



Typical 18 Pod AX100 Layout



			ROBERT G. CAMPBELL & ASSOC., L.P. CONSULTING ENGINEERS KNOXVILLE, TENNESSEE			LAKESIDE ESTATES SANITARY SEWER SYSTEM			TYPICAL 18-POD ADVANTEX AX-100 TREATMENT SYSTEM			DESIGNED BY AWO	CHECKED BY RJC	SCALE NTS	SHEET NO.	
NO.	DATE	DESCRIPTION	BY	CRD.	REVISED							DRAIN BY AWO	DATE 10/4/2007	FILE NO. 06108	OF 5	SHEETS



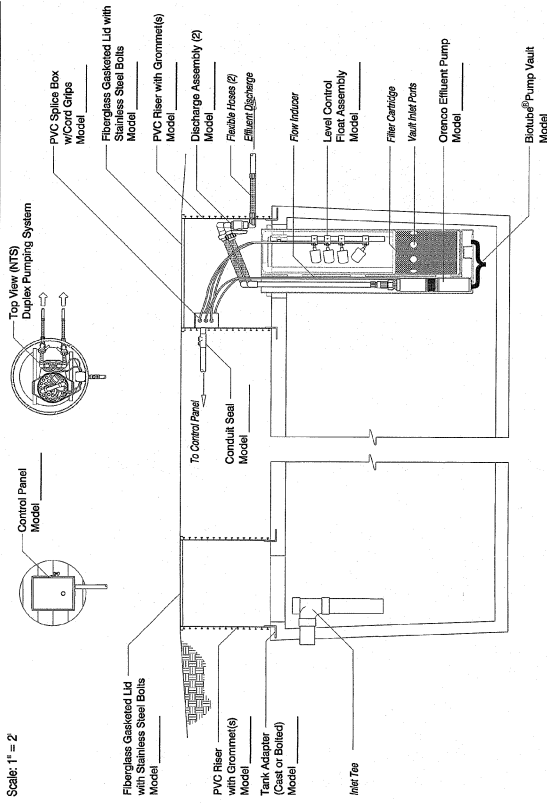
GRAPHIC SCALE 1"=200'

A horizontal graphic scale bar with a total length of 600 feet. It is divided into four equal segments, each representing 150 feet. The segments are further subdivided into smaller units. The scale is labeled with '0', '200', '400', and '600' at the major divisions. The text 'GRAPHIC SCALE' and '1"=200\'' are printed above the bar.

		<b>ROBERT G. CAMPBELL &amp; ASSOC., L.P.</b> CONSULTING ENGINEERS KNOXVILLE, TENNESSEE		<b>LAKESIDE ESTATES SUBDIVISION</b> <b>ON NORRIS LAKE</b>		<b>SEWER PLAN</b> <b>PRELIMINARY</b>		DESIGNED BY <b>HAJ</b>	CHECKED BY <b>HAJ</b>	SCALE <b>1" = 200'</b>	SHEET <b>1</b>
NO. _____		DATE _____		DATE _____		DRAWN BY <b>HAJ</b>		FILE NO. <b>410</b>		NO. _____	
NO. _____		DESCRIPTION <b>REVISIONS</b>		BY <b>HAJ</b>		NO. _____		NO. _____		NO. _____	

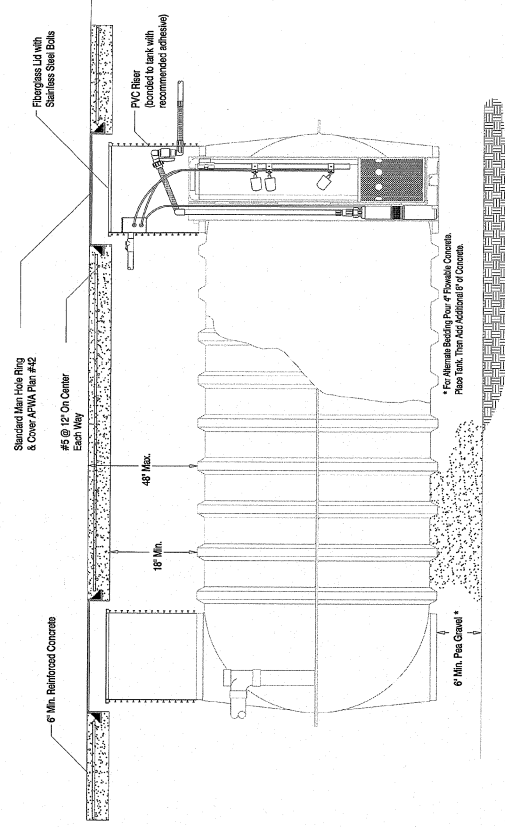
# Effluent Pumping System - Duplex

Scale: 1" = 2'



# Oreco Fiberglass Tank with H-20 Traffic Load

Oreco 1,500 gal. Fiberglass Tank



NO.	DATE	DESCRIPTION
REVISIONS		



ROBERT G. CAMPBELL & ASSOC., L.P.  
CONSULTING ENGINEERS  
KNOXVILLE, TENNESSEE

LAKESIDE ESTATES SUBDIVISION  
ON NORRIS LAKE

PUMP AND SEPTIC TANK  
DESIGN VIEW

DESIGNED BY BAG	CHECKED BY BAG	SCALE NTS	SHEET NO.
DRAWN BY BAG	DATE 4/11/07	FILE NO. 07030	3
			7 OF 7 SHEETS





CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Shilina B. Brown, Esq.  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Shilina.Brown@ag.tn.gov](mailto:Shilina.Brown@ag.tn.gov)

Victoria B. Glover, Esq.  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Victoria.Glover@ag.tn.gov](mailto:Victoria.Glover@ag.tn.gov)

This the 22<sup>nd</sup> day of May 2024.

  
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Katherine Barnes