

# BUTLER | SNOW

June 7, 2023

## **VIA ELECTRONIC FILING**

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)

Electronically Filed in TPUC Docket  
Room on June 7, 2023 at 5:14 p.m.

**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:

Please find enclosed Limestone Water Utility Operating Company, LLC's responses to the requests from the Consumer Advocate Division, dated April 11, 2023.

The original and four (4) hard copies will follow. Please feel free to reach out to me if you have any further questions.

Sincerely,

BUTLER SNOW LLP



Katherine Barnes

Enclosure

cc: Russ Mitten, Limestone Water Utility Operating Company  
Vance Broemel, Consumer Advocate Division  
Karen H. Stachowski, Consumer Advocate Division

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BUTLER SNOW LLP

June 7, 2023

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**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 Mr. Rush:

Please find below Limestone's responses to your data requests dated April 11, 2023.

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

1. *Rule 1220-04-13-.17(2)(a)7(i,iii-v). The map in Exhibit 1 lacks sufficient detail to comply with the rule. The map does provide street names in accordance with subsection (ii), however, this rule requires a list of other details that are not provided in Exhibit 1. While maps may have been filed in previous dockets, the Joint Petitioners should file the most current maps available in this docket so that the public can readily assess them in this proceeding. Please provide a map or maps that satisfy Rule 1220-04-13-.17(2)(a)7.*

**Response:** Please find attached **Revised Collective Exhibit 1** to the Joint Application. This exhibit includes an updated map and an Engineering Report. Read together, these documents provide all the available details outlined above.

**Rule 1220-04-14-.08(2) Acquisitions**

1. *Rule 1220-04-14-.08(2)e. The statement in Exhibit 1 lacks sufficient detail to comply with the rule, as it does not "comprehensively describe the service area of the selling utility" and the maps provided in Exhibit 1 do not contain the information required in the rule*

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*governing wastewater utility maps and records. Under Rule 1220-04-13-.05, a wastewater utility "shall keep on file in its main office suitable maps, plans, and records showing the entire layout of its wastewater system including the location, size and capacity of each component." Please provide a comprehensive description of the area, and maps that satisfy this rule and Rule 1220-04-13-.05.*

**Response:** Please see the Service Area Legal Description section within the **Revised Collective Exhibit 1**.

2. *Rule 1220-04-14-.08(2)1. On page 8 of the "Appendix A" to the Petition, the Company states that the required statement is "contained in the Joint Application." However, the Consumer Advocate is unable to locate a statement specifically addressing "the particular benefits, costs, or service changes, if any, that affect acquired customers and/or existing customers." Please provide this statement.*

**Response:** Although Limestone details below various benefits supporting a potential acquisition premium to comply with the updated Filing Requirements adopted by the TN PUC, the Company is not requesting an acquisition premium in the current case and the Commission will not be asked to approve any acquisition adjustments related to the purchase of DSH's assets as Limestone is proposing to defer these issues to a future rate case. However, approving the proposed transfer of wastewater assets currently owned by DSH & Associates, LLC would be in the public interest. The affiliated group to which Limestone Water UOC belongs has demonstrated it has the managerial and operational expertise and experience necessary to own and operate the subject systems. It also has access to capital necessary to repair and upgrade those systems to ensure they comply with all health and environmental regulations and provide safe and reliable service to customers.

CSWR, LLC, and its affiliated utility operating companies have a proven track record of acquiring small, oftentimes distressed, water and wastewater systems, making the repairs and upgrades those systems require, and operating them in a way that pleases utility and environmental regulators alike. As evidence of their successes, utility, and environmental regulators in several states where affiliates currently operate have sought out those affiliates and asked them to become the emergency operator of systems in need of immediate aid. The Missouri Public Service Commission and the Missouri Department of Natural Resources have recognized the solid track record CSWR, and its affiliates have established for acquiring, rehabilitating, maintaining, and operating troubled water and wastewater systems in that state.

As its website expressly states, the mission of CSWR and its affiliates is to bring safe, reliable, and environmentally responsible water resources to every community in the United States. As it works to accomplish that objective, the group is transforming how water utilities work by using technology and innovation to quickly assess and invest in reliable infrastructure that meets or exceeds stringent state and federal safety standards, ensuring all communities across the country have access to safe, clean, and reliable water

resources while protecting the aquifers, lakes, rivers, and streams that are essential to our world.

Technical resources and operational expertise that would be available to DSH customers already have greatly improved the quality of utility service provided to customers of affiliates in Missouri, Arkansas, Louisiana, Kentucky, Texas, and Mississippi. CSWR has on staff engineers and other trained and qualified personnel with experience in the design and operation of water and wastewater systems, and CSWR supplements those resources with qualified and licensed local contract operators who are responsible for day-to-day plant operations. Access to these and other resources available through its affiliation with CSWR would allow Limestone Water to achieve economies of scale not generally available to similarly sized water and wastewater utilities. The affiliated group's business model makes this expertise and experience available to affiliates and does so through economies of scale that can be achieved because of CSWR's centralized management structure.

CSWR also has developed and implemented operating processes and technologies that improve service to customers. If authorized to make the acquisition proposed in this application, Limestone Water plans to implement operational changes specifically designed to improve and enhance customer service. Customers would have access to a 24-hour phone line to report any utility service issues. Information received from those calls would then be transferred into CSWR's computerized maintenance management system and converted into work orders, which creates a historical record of all reported service issues. The work order also ensures contracted customer service personnel can quickly commence work required to deal with issues affecting service efficiently and expeditiously.

CSWR utilizes the Computerized Maintenance Management System (CMMS), program Utility Cloud to facilitate field work, inspections, maintenance schedules, and reporting for all facilities. This allows CSWR to manage data, work, and compliance across plant and distributed field assets. Utility Cloud has been implemented to assist in avoiding compliance and equipment failures with real-time data monitoring across people, machines, and sensors throughout all our service areas.

The main benefit that Utility Cloud offers CSWR is that the system is highly configurable, easy-to-use asset management tool that helps all parties distribute work, report on maintenance, and streamline compliance reports. With the system being highly configurable CSWR can build out the systems efficiently and begin tracking maintenance and improvements day one of ownership.

It is paramount to our operations that this product is used, and a big proponent of that is the ease of use. Most of the end users of this system require only a 4-hour training session to be able to navigate, create and assign work, and complete the Work Orders. The ability to get our contractors trained so quickly speaks volumes to how easy the system is to operate. That initial training is adequate for 90% of our operators.

Features of Utility Cloud that have been beneficial to our operations and streamlined time consuming processes consist of:

- Automating the completion and submission of compliance reports using the exact field data your crew collects.
- Utilize custom accounts, security roles, and user rights to maintain the separation between projects and managing multiple contractors while storing all CSWR's data in one database.
- Manage and track maintenance history on all assets to assist in identifying potential capital improvement projects.
- Created custom alerts to trigger as issues arise.
- Leveraging digital SOPs, manuals, and layouts helping standardize complex work and to
- meet regulatory and OSHA requirements.
- Create powerful workflows and reports for our compliance objectives.
- Integration with the survey database to create a useable asset for field work tracking, utilizing real-time data and leveraging analytical tools to trend plant performance.

As part of the CSWR's arsenal of tools utilized, Utility Cloud is pivotal in the operation and maintenance of the facilities that take over. The ability to create custom workflows gives us the ability to collect asset and task specific data quickly and efficiently. Utilizing this system allows for CSWR to quickly implement new processes that are applicable for all our sites across the country with the click of a button. This is the type of configuration scalability that CSWR requires and Utility Cloud delivers.

Limestone Water also would ensure customers have access to customer service representatives during normal business hours to discuss customer concerns. Additionally, Limestone Water will establish a utility-specific webpage and dedicated email address to keep customers informed about their utility service. Information available on the website would include state mandated drinking water testing information, up-to-date website bulletins about current service status, and service initiation or discontinuance procedures. Limestone Water also will also implement a dedicated social media page to offer another avenue of communication with customers. Limestone Water also will offer online bill paying options to customers including e-checks, debit card, and credit cards.

Due to all of the above, the existing customers of Limestone Water UOC and the existing customers of DSH would benefit from the proposed transaction. The technical, managerial, and financial capabilities of Limestone Water and its parent company CSWR will provide economies of scale that cannot be recognized by systems the size of DSH. As such, the Company believes that an Acquisition Premium is prudent for all affected parties.

Further, certain benefits, efficiencies and service changes are outlined in the Pre-filed Direct Testimony of Limestone Witness Josiah Cox.

3. *Rule 1220-04-14-.08(2)m. Exhibit 29 to the Petition shows contributed assets from DSH. However, the "year of report" is 2021. Please provide the same page from DSH's most recent annual report.*

Response: Please see attached a **Revised Exhibit 29** to the Joint Application for the most recent annual report provided by DSH & Associates, LLC.

Rule 1220-04-14-.08(5) Acquisitions

1. *Rule 1220-04-14-.08(5). Limestone & DSH provided a copy of the draft Customer Notification Letter as Exhibit 13 of the Petition. Please provide a copy of proof of the published public notice.*

Response: Please see attached the Customer Notification Letter, filed as **Supplemental Exhibit 13**, that was sent to DSH customers on May 26, 2023.

Please feel free to reach out to me if you have any further questions.

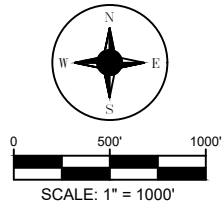
Sincerely,

BUTLER SNOW LLP



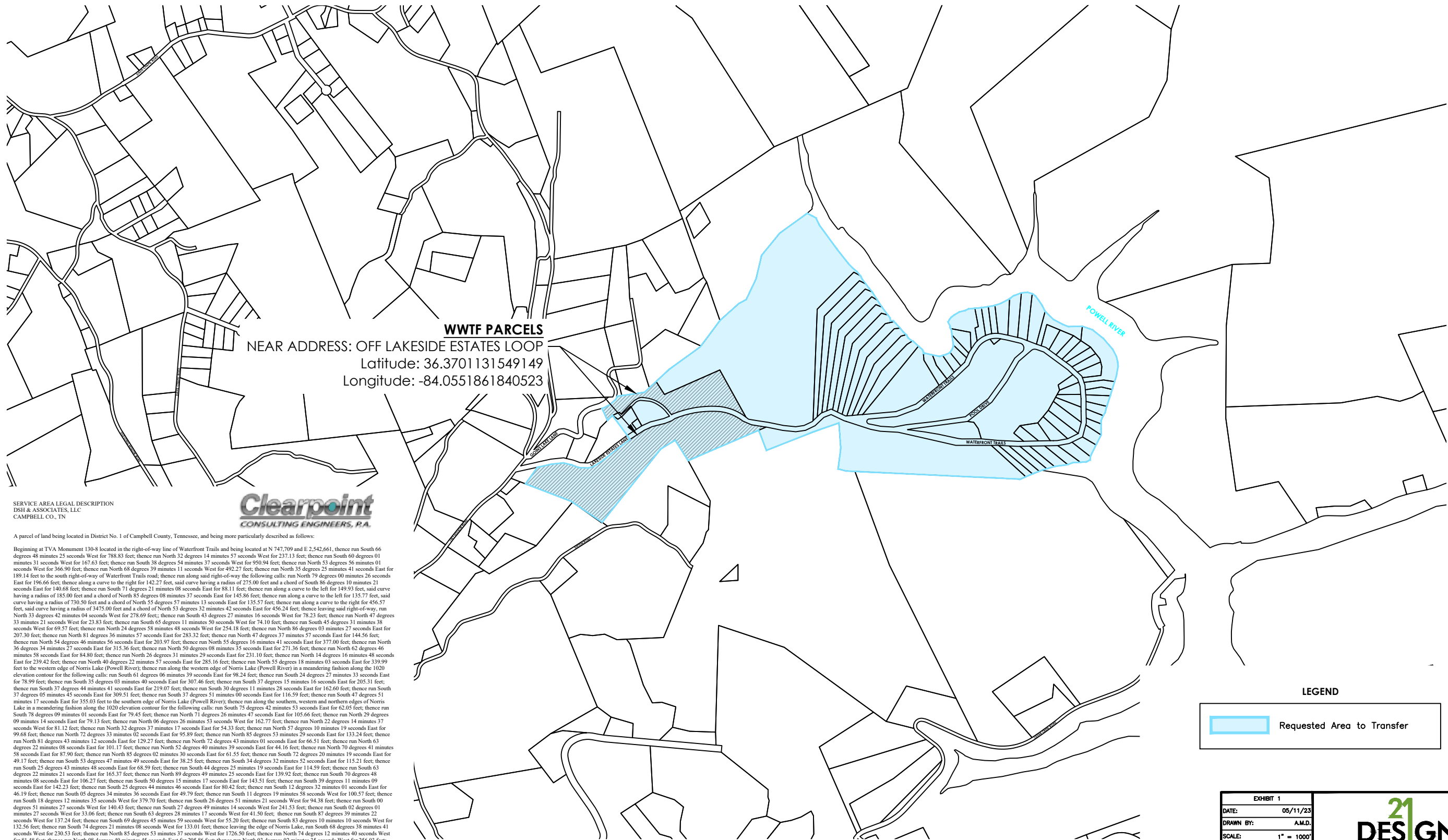
Katherine Barnes

cc: Russ Mitten, Limestone Water Utility Operating Company  
Vance Broemel, Consumer Advocate Division  
Karen H. Stachowski, Consumer Advocate Division



# PROPOSED SERVICE AREA MAP — DSH, TN LAFOLLETTE, TN

General Location Map



LEGEND

Requested Area to Transfer

SERVICE AREA LEGAL DESCRIPTION  
DSH & ASSOCIATES, LLC  
CAMPBELL CO., TN



A parcel of land being located in District No. 1 of Campbell County, Tennessee, and being more particularly described as follows:

Beginning at TVA Monument 130-8 located in the right-of-way line of Waterfront Trails and being located at N 747.709 and E 2,542.661, thence run South 66 degrees 48 minutes 25 seconds West for 788.83 feet; thence run North 32 degrees 14 minutes 57 seconds West for 237.13 feet; thence run South 60 degrees 01 minutes 31 seconds West for 167.63 feet; thence run South 38 degrees 37 seconds West for 950.94 feet; thence run North 33 degrees 46 minutes 01 seconds West for 366.90 feet; thence run North 68 degrees 39 minutes 11 seconds West for 492.27 feet; thence run North 25 degrees 25 minutes 41 seconds East for 189.14 feet to the south right-of-way of Waterfront Trails road; thence run along said right-of-way the following calls: run North 79 degrees 00 minutes 26 seconds East for 196.66 feet; thence along a curve to the right for 142.27 feet, said curve having a radius of 275.00 feet and a chord of South 86 degrees 10 minutes 21 seconds East for 140.68 feet; thence run South 71 degrees 21 minutes 08 seconds East for 88.11 feet; thence run along a curve to the left for 149.93 feet, said curve having a radius of 185.00 feet and a chord of North 85 degrees 08 minutes 37 seconds East for 145.86 feet; thence run along a curve to the left for 135.77 feet, said curve having a radius of 730.50 feet and a chord of North 55 degrees 57 minutes 13 seconds East for 135.57 feet; thence run along a curve to the right for 456.57 feet, said curve having a radius of 3475.00 feet and a chord of North 53 degrees 32 minutes 42 seconds East for 456.24 feet; thence leaving said right-of-way, run North 33 degrees 42 minutes 04 seconds West for 278.69 feet; thence run South 43 degrees 27 minutes 16 seconds West for 78.23 feet; thence run North 47 degrees 33 minutes 21 seconds West for 23.83 feet; thence run South 65 degrees 11 minutes 50 seconds West for 74.10 feet; thence run South 45 degrees 31 minutes 38 seconds West for 69.57 feet; thence run North 24 degrees 58 minutes 48 seconds West for 254.18 feet; thence run North 86 degrees 03 minutes 27 seconds East for 207.30 feet; thence run North 81 degrees 36 minutes 57 seconds East for 283.32 feet; thence run North 47 degrees 37 minutes 57 seconds East for 144.56 feet; thence run North 54 degrees 46 minutes 56 seconds East for 203.97 feet; thence run North 55 degrees 16 minutes 41 seconds East for 377.00 feet; thence run North 36 degrees 34 minutes 27 seconds East for 315.36 feet; thence run North 50 degrees 08 minutes 35 seconds East for 271.36 feet; thence run North 62 degrees 46 minutes 58 seconds East for 84.80 feet; thence run North 26 degrees 31 minutes 29 seconds East for 231.10 feet; thence run North 14 degrees 16 minutes 48 seconds East for 239.42 feet; thence run North 40 degrees 22 minutes 57 seconds East for 285.16 feet; thence run North 55 degrees 18 minutes 03 seconds East for 339.99 feet to the western edge of Norris Lake (Powell River); thence run along the western edge of Norris Lake (Powell River) in a meandering fashion along the 1020 elevation contour for the following calls: run South 61 degrees 06 minutes 39 seconds East for 98.24 feet; thence run South 24 degrees 27 minutes 33 seconds East for 78.99 feet; thence run South 35 degrees 03 minutes 40 seconds East for 307.46 feet; thence run South 37 degrees 15 minutes 16 seconds East for 205.31 feet; thence run South 37 degrees 44 minutes 41 seconds East for 219.07 feet; thence run South 30 degrees 11 minutes 28 seconds East for 162.60 feet; thence run South 37 degrees 05 minutes 45 seconds East for 309.51 feet; thence run South 37 degrees 51 minutes 00 seconds East for 116.59 feet; thence run South 47 degrees 51 minutes 17 seconds East for 255.03 feet to the southern edge of Norris Lake (Powell River); thence run along the southern, western and northern edges of Norris Lake in a meandering fashion along the 1020 elevation contour for the following calls: run South 75 degrees 42 minutes 53 seconds East for 62.05 feet; thence run South 78 degrees 09 minutes 01 seconds East for 79.45 feet; thence run North 71 degrees 26 minutes 47 seconds East for 105.66 feet; thence run North 29 degrees 09 minutes 14 seconds East for 79.13 feet; thence run North 06 degrees 26 minutes 53 seconds West for 162.77 feet; thence run North 22 degrees 14 minutes 37 seconds West for 81.12 feet; thence run North 32 degrees 37 minutes 17 seconds East for 54.33 feet; thence run North 57 degrees 10 minutes 19 seconds East for 99.68 feet; thence run North 72 degrees 33 minutes 02 seconds East for 95.89 feet; thence run North 85 degrees 39 minutes 29 seconds East for 133.24 feet; thence run North 81 degrees 43 minutes 12 seconds East for 129.27 feet; thence run North 72 degrees 43 minutes 01 seconds East for 66.51 feet; thence run North 63 degrees 22 minutes 08 seconds East for 101.17 feet; thence run North 52 degrees 40 minutes 39 seconds East for 44.16 feet; thence run North 70 degrees 41 minutes 59 seconds East for 87.90 feet; thence run North 85 degrees 02 minutes 30 seconds East for 143.51 feet; thence run South 39 degrees 11 minutes 09 seconds East for 49.17 feet; thence run South 53 degrees 47 minutes 49 seconds East for 38.25 feet; thence run South 34 degrees 32 minutes 52 seconds East for 115.21 feet; thence run South 25 degrees 43 minutes 48 seconds East for 68.59 feet; thence run South 44 degrees 25 minutes 19 seconds East for 114.59 feet; thence run South 63 degrees 22 minutes 21 seconds East for 165.37 feet; thence run North 89 degrees 49 minutes 25 seconds East for 139.92 feet; thence run South 70 degrees 48 minutes 08 seconds East for 106.27 feet; thence run South 50 degrees 15 minutes 17 seconds East for 143.51 feet; thence run South 39 degrees 11 minutes 09 seconds East for 142.23 feet; thence run South 25 degrees 44 minutes 46 seconds East for 80.42 feet; thence run South 12 degrees 32 minutes 01 seconds East for 46.19 feet; thence run South 05 degrees 34 minutes 36 seconds East for 49.79 feet; thence run South 11 degrees 19 minutes 58 seconds West for 100.57 feet; thence run South 18 degrees 12 minutes 35 seconds West for 379.70 feet; thence run South 26 degrees 51 minutes 21 seconds West for 94.38 feet; thence run South 00 degrees 51 minutes 27 seconds West for 140.43 feet; thence run South 27 degrees 49 minutes 14 seconds West for 241.53 feet; thence run South 02 degrees 01 minutes 27 seconds West for 33.06 feet; thence run South 63 degrees 28 minutes 17 seconds West for 41.50 feet; thence run South 87 degrees 39 minutes 22 seconds West for 137.24 feet; thence run South 69 degrees 45 minutes 59 seconds West for 55.20 feet; thence run South 83 degrees 10 minutes 10 seconds West for 132.56 feet; thence run South 74 degrees 21 minutes 08 seconds West for 133.01 feet; thence leaving the edge of Norris Lake, run South 68 degrees 38 minutes 41 seconds West for 230.53 feet; thence run North 85 degrees 53 minutes 37 seconds West for 1726.50 feet; thence run North 74 degrees 12 minutes 40 seconds West for 81.48 feet; thence run North 08 degrees 40 minutes 45 seconds East for 205.86 feet; thence run North 03 degrees 02 minutes 35 seconds West for 256.03 feet; thence run South 71 degrees 53 minutes 48 seconds West for 262.36 feet; thence run South 69 degrees 36 minutes 37 seconds West for 512.16 feet; thence run North 19 degrees 55 minutes 54 seconds West for 250.18 feet back to the Point of Beginning. Said parcel contains 174.8 acres, more or less.



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# SANITARY SEWER SYSTEM FOR LAKESIDE ESTATES




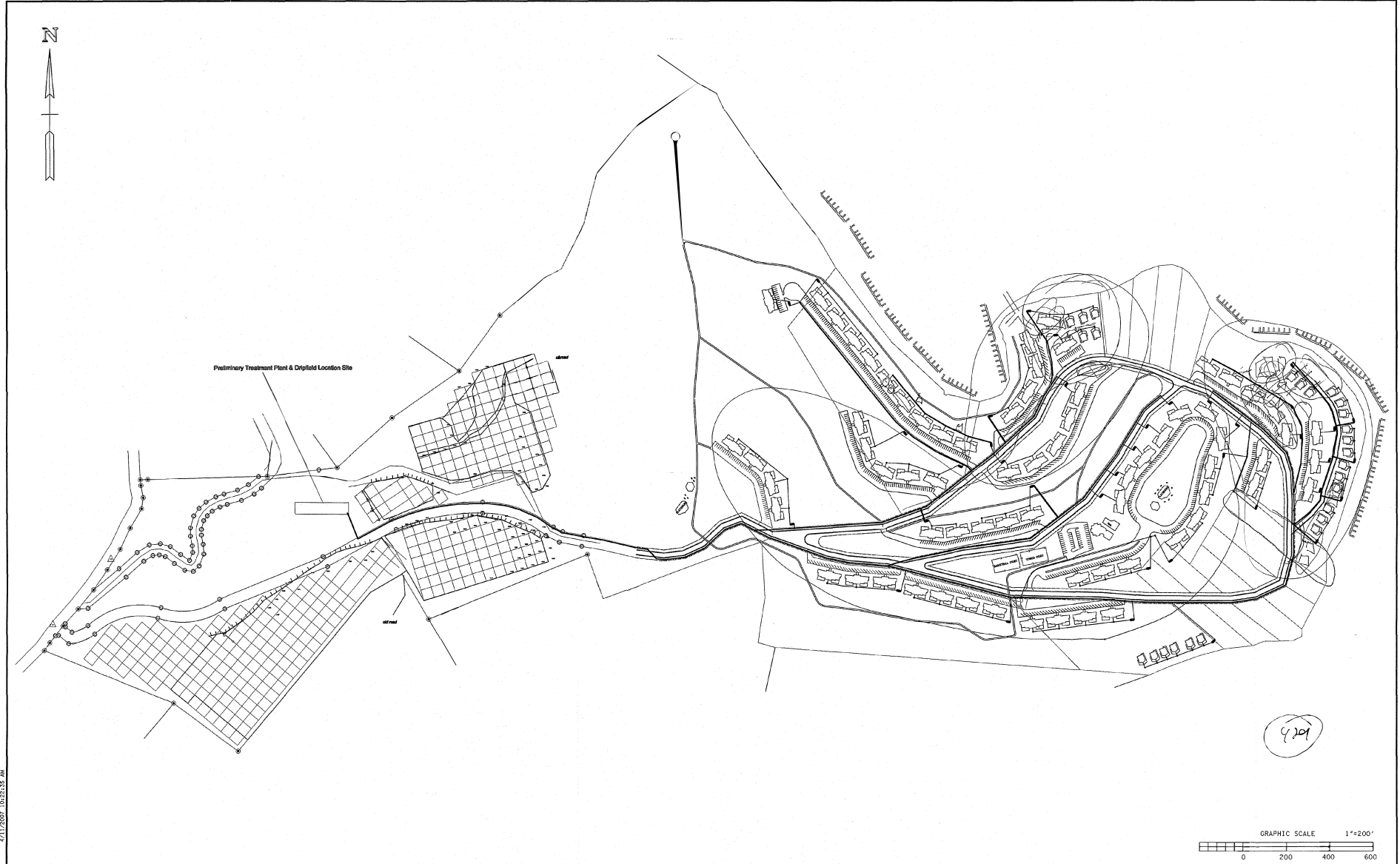
Eddie W. Troxell  
EDDIE TROXELL  
SUPERINTENDENT OF WATER OPERATIONS  
LAFOLLETTE UTILITIES BOARD







 <b>PG&amp;A</b> CONSULTING ENGINEERS KNOXVILLE, TENNESSEE		<b>ROBERT G. CAMPBELL &amp; ASSOC., L.P.</b> CONSULTING ENGINEERS KNOXVILLE, TENNESSEE		<b>LAKESIDE ESTATES</b> <b>SANITARY SEWER SYSTEM</b>		<b>TYPICAL 18-POD ADVANTEX</b> <b>AX-100 TREATMENT SYSTEM</b>		SHEET NO. <b>5</b> OF <b>5</b>	
NO. DATE DESCRIPTION REVISIONS		BY C.D. C.D.		CHECKED BY AWO		SCALE N.T.S.		DATE 10/4/2007	

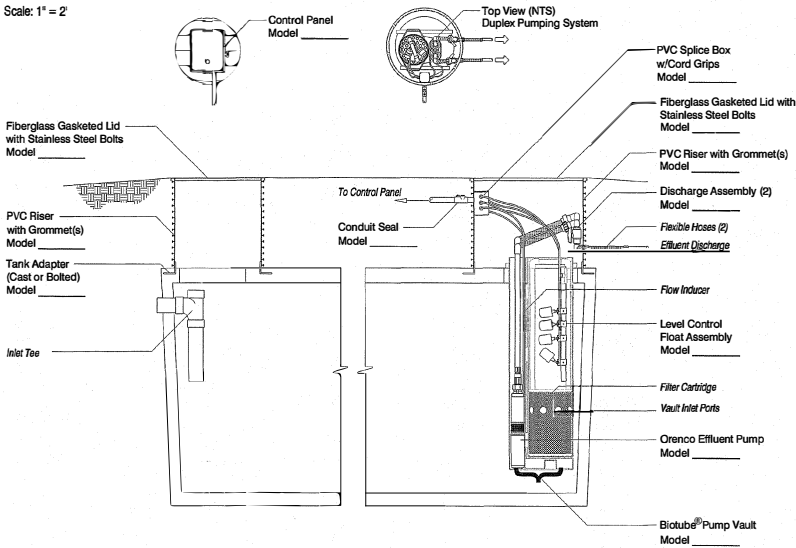


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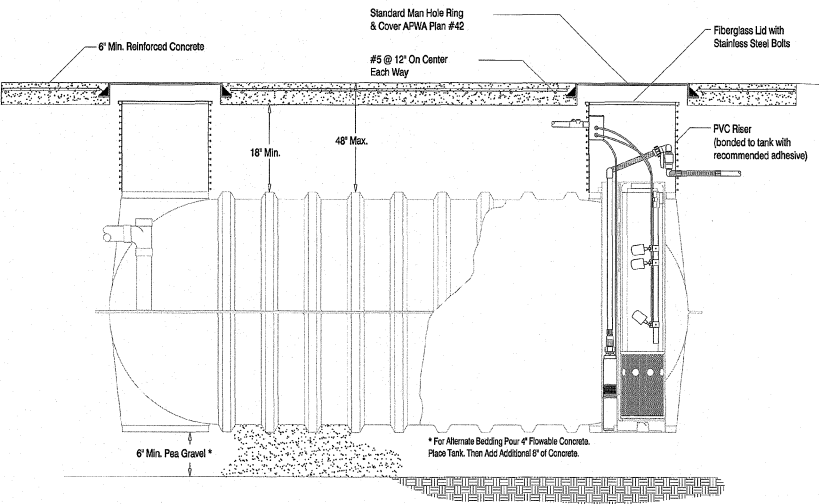
Effluent Pumping System - Duplex

Scale: 1" = 2'



Orenco Fiberglass Tank with H-20 Traffic Load

Orenco 1,500 gal. Fiberglass Tank



L:\PROJECTS\2007\070304\070304.dwg 4/11/2007 3:22:02 AM

NO.	DATE	DESCRIPTION	BY	CHKD.



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

LAKESIDE ESTATES SUBDIVISION  
ON NORRIS LAKE

PUMP AND SEPTIC TANK  
DESIGN VIEW

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



F-8

<b>Name of Respondent</b> DSH & Associates, LLC		<b>This Report is:</b> (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		<b>Date of Report</b> (Mo, Da, Yr) 3/25/23	<b>Year of Report</b> 2022
<b>CONTRIBUTIONS IN AID OF CONSTRUCTION (271)</b>					
<b>Description</b> (a)		<b>Water</b> (b)	<b>Sewer</b> (c)	<b>Total</b> (d)	
<b>Balance First of Year</b>		-	-	-	
Add Credits During Year		-	137,557	137,557	
Less Charges During Year		-	-	-	
<b>Balance End of Year</b>		0	137,557	137,557	
Less Accumulated Amortization		-	-	-	
<b>Net Contributions in Aid of Construction</b>		0	137,557	137,557	
<b>ADDITIONS TO CONTRIBUTIONS IN AID OF CONSTRUCTION DURING YEAR (CREDITS)</b>					
<b>Report below all developers or contractors agreements from which cash or property was received during the year</b> (a)		<b>Indicate "Cash" or "Property"</b> (b)	<b>Water</b> (c)	<b>Sewer</b> (d)	
Contractor or Developer #1			-	-	
Contractor or Developer #2			-	-	
Contractor or Developer #3			-	-	
Contractor or Developer #4			-	-	
Contractor or Developer #5			-	-	
Contractor or Developer #6			-	-	
Contractor or Developer #7			-	-	
Contractor or Developer #8			-	-	
Contractor or Developer #9			-	-	
Contractor or Developer #10			-	-	
Contractor or Developer #11			-	-	
Contractor or Developer #12			-	-	
Contractor or Developer #13			-	-	
Contractor or Developer #14			-	-	
Contractor or Developer #15			-	-	
Contractor or Developer #16			-	-	
Contractor or Developer #17			-	-	
Contractor or Developer #18			-	-	
Contractor or Developer #19			-	-	
Contractor or Developer #20			-	-	
Contractor or Developer #21			-	-	
Contractor or Developer #22			-	-	
Contractor or Developer #23			-	-	
Contractor or Developer #24			-	-	
Contractor or Developer #25			-	-	
Contractor or Developer #26			-	-	
Contractor or Developer #27			-	-	
Contractor or Developer #28			-	-	
Contractor or Developer #29			-	-	
Contractor or Developer #30			-	-	
<b>Total Credits During Year</b>			0	0	





**LIMESTONE WATER**

**Utility Operating Company**

A CSWR Managed Utility

May 26<sup>th</sup>, 2023

Dear Current Customer of DSH & Associates, LLC,

Limestone Water Utility Operating Company, LLC. (Limestone Water) and DSH & Associates, LLC (DSH) have filed a joint application with the Tennessee Public Utility Commission (TPUC) seeking Commission authorization for DSH to sell to Limestone Water its sewer system assets. DSH is currently serving approximately 46 connections in Campbell County.

If the proposal is approved by the TPUC, Limestone Water be subject to the jurisdiction of the TPUC in the following service areas:

- DSH

Limestone Water proposes to adopt the existing rate structure for all customers.

After completing the proposed acquisition of these service areas, Limestone Water plans to construct numerous improvements to the systems to address degradation due to age and environmental compliance issues.

Those wishing to comment should contact the TN Public Utility Commission at:

502 Deaderick Street  
4th Floor  
Nashville, TN 37243  
(800) 342-8359  
675-747-2904  
contact.tpuc@tn.gov

Refer to TPUC Docket Number 23-00016 in all correspondence.

If you have questions, please contact Limestone Water at 314-736-4672 or the above public office of the Tennessee Public Utility Commission.

Sincerely,

Josiah Cox

Limestone Utility Operating Company, LLC