

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
EXPEDITED JOINT APPLICATION OF)	
LIMESTONE WATER UTILITY)	
OPERATING COMPANY, LLC, AND)	
DSH & ASSOCIATES, LLC, FOR)	
APPROVAL OF THE ACQUISITION OF)	DOCKET NO. 23-00016
AND TO OPERATE THE)	
WASTEWATER SYSTEM OF DSH &)	
ASSOCIATES, LLC, AND TO)	
TRANSFER OR ISSUE A)	
CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS TO
LIMESTONE WATER UTILITY OPERATING COMPANY, LLC**

Pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11, the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, propounds the following discovery requests to Limestone Water Utility Operating Company, LLC (“Limestone” or the “Company”).

The Company shall serve full and complete responses in accordance with the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Mason C. Rush, on or before 2:00pm (Central Time), July 12, 2023. The Preliminary Matters and Definitions set forth in the Consumer Advocate’s First Set of Discovery Requests are hereby incorporated by reference as if fully restated herein.

SECOND DISCOVERY REQUESTS

- 2-1. Refer to the Company's response to Consumer Advocate DR No. 1-4. Specifically, refer to the updated Revised Exhibit 19. Reconcile the \$137,557 shown for the DSH acquisition to the 2022 Utility Plant in Service of \$90,606 as found in the "DSH 2022 Annual Report".

RESPONSE:

- 2-2. Refer to the Company's response to Consumer Advocate DR No. 1-12. Refer also to the *Stipulation and Settlement Agreement* filed October 12, 2021, in TPUC Docket No. 21-00053 concerning the Company's acquisition of Cartwright Creek, LLC. If the escrowed funds are found to be part of the acquisition in this docket, will the Company hold the escrowed funds in a separate account from the other escrowed funds of the Company? Additionally, if the Petition is approved, will the Company hold future escrowed funds in a separate account from other escrowed funds received? If the Company intends to treat escrowed funds differently than described above, explain how it intends to treat such funds and its rationale for doing so.

RESPONSE:

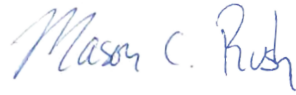
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In re: Limestone / DSH

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Consumer Advocate's Second Set of Discovery Requests to Limestone

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink that reads "Mason C. Rush". The signature is written in a cursive, flowing style.

MASON C. RUSH (BPR No. 039471)

Assistant Attorney General

KAREN H. STACHOWSKI (BPR No. 019607)

Senior Assistant Attorney General

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In re: Limestone / DSH

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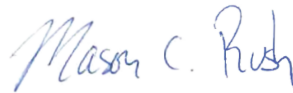
Consumer Advocate's Second Set of Discovery Requests to Limestone

CERTIFICATE OF SERVICE

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

Melvin Malone
Katherine Barnes
Butler Snow LLP
The Pinnacle at Symphony Place
150 Third Avenue South, Suite 1600
Nashville, TN 37201
Phone: (615) 651-6700
Email: Melvin.Malone@butlersnow.com
Email: Katherine.Barnes@butlersnow.com

On this the 5th day of July 2023.



MASON C. RUSH
Assistant Attorney General