

STATE OF TENNESSEE

Office of the Attorney General



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July 20, 2023

Kelly Cashman-Grams  
General Counsel  
c/o Tory Lawless  
Docket Manager  
Tennessee Public Utility Commission  
502 Deaderick Street  
Nashville, TN 37243

Electronically Filed in TPUC Docket  
Room on July 20, 2023 at 3:24 p.m.

Re: Tennessee Public Utility Commission, Docket No. 23-00016, *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*

Dear Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate") respectfully requests the Tennessee Public Utility Commission ("TPUC") to furnish the following records which the Consumer Advocate believes TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced docket.

The Consumer Advocate would note that, in its Response to Consumer Advocate DR 2-9 filed in this Docket July 12, 2023, DSH & Associates, LLC ("DSH") stated the following: "Unfortunately, DSH did not become aware of the TPUC Rule 1220-04-13-.07(7) until April of 2023. At that time, DSH communicated its oversight to TPUC and reviewed the expenditures for the last couple of years with TPUC."

The records requested by the Consumer Advocate are as follows:

1. Any communication between DSH or Limestone Water Utility Operating Company, LLC ("Limestone") and TPUC or TPUC Staff concerning expenditures from DSH escrow accounts.

Thank you for your time and consideration of this request. If you have questions regarding this request, please contact me at (615) 741-2357.

Respectfully,

A handwritten signature in blue ink, reading "Mason C. Rush". The signature is fluid and cursive, with the first name "Mason" being the most prominent.

Mason C. Rush  
Assistant Attorney General

cc: All Parties of Record