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May 16, 2024

David Foster  
Director, Utility Division  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Fl.  
Nashville, Tennessee 37243

Docket No. 23-00036

Dear David,

My client, Serenity Trust, is the developer of a small, residential development called “Nash Ridge” in Williamson County. On January 26, 2024, the Commission issued a final order in Docket No. 23-00036 approving the application of Limestone Utility Operating Company to provide wastewater service to that development. The award of the certificate was based on Limestone’s statement that “several ongoing repair projects” on the treatment system at Grasslands “will free up underutilized or unavailable treatment capacity” that can be allocated to Nash Ridge. Order at 4. “Limestone expects these repairs to be complete within the next year.” *Id.*

Limestone informed the Commission in July, 2023 that the repairs needed in order to free up sufficient capacity to handle Nash Ridge “are expected to be completed within the next year.” Response to Staff Data Requesting July 24, 2023, Response 4. Those repairs were described by Limestone as “the replacement of a failed influent screen, inflow and infiltration investigations, and a sewer main/manhole lining project to reduce flow coming into the plant.” *Id.*

As noted in The Utility Service Agreement, Serenity Trust has already paid Limestone \$100,000 over and above any contributions in aid of construction in order to contribute to the cost of those repairs. See Exhibit 20A filed June 21, 2023, Section 6.1.

Serenity Trust has asked Limestone to provide a timetable regarding those repairs. Limestone has not yet provided that information, and Serenity Trust is unable to plan its own construction schedule.

Since the Commission’s Order granting Limestone’s petition to serve Nash Ridge was contingent upon Limestone’s commitment to make the repairs necessary to create sufficient capacity to serve Nash Ridge, my client respectfully asks that the Commission staff send a data

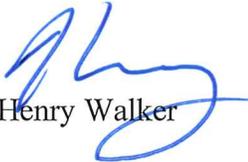
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request to Limestone asking the utility to give its best estimate as to when the repairs will begin and when the repairs are likely to be completed.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

  
Henry Walker

HW/cc

cc: Katherine Barnes, Attorney for Limestone