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June 30, 2025

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on June 30, 2025 at 3:16 p.m.

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

RE: *Limestone Water Utility Operating Company, LLC's Application to Expand its Certificate of Convenience and Necessity to Serve the Nash Ridge Subdivision, Williamson County, Tennessee, TPUC Docket No. 23-00036*

Dear Chairman Jones:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Third Report on the Status of Compliance*, pursuant to the Order Amending Certificate of Public Convenience and Necessity in the above-captioned matter.

As required, the original and 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.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachment

cc: Russ Mitten, Central States Water Resources
Vance Broemel, Consumer Advocate Division
Karen H. Stachowski, Consumer Advocate Division

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

IN RE:)	
)	
LIMESTONE WATER UTILITY)	
OPERATING COMPANY, LLC’S)	
APPLICATION TO EXPAND ITS)	DOCKET NO. 23-00036
CERTIFICATE OF CONVENIENCE)	
AND NECESSITY TO SERVE THE)	
NASH RIDGE SUBDIVISION IN)	
WILLIAMSON COUNTY, TENNESSEE)	

**LIMESTONE WATER UTILITY OPERATING COMPANY, LLC’S
THIRD REPORT ON THE STATUS OF COMPLIANCE**

On January 26, 2024, the Tennessee Public Utility Commission (“Commission”) issued its *Order Amending Certificate of Public Convenience and Necessity* (“2024 CCN Order”) in the above-captioned matter. The 2024 CCN Order required Limestone Water Utility Operating Company, LLC (“Limestone”) to make certain filings in this docket, including periodic updates on the status of the provision of wastewater service to the Nash Ridge Subdivision.¹ Limestone filed its initial report on July 25, 2024; in that report, Limestone proposed a subsequent compliance update on January 1, 2025.² The second compliance report was filed on January 2, 2025, due to the Commission’s closure on the holiday.

I. STATUS OF WASTEWATER SERVICE

As described in Limestone’s previous reports, the Grasslands wastewater treatment plant is aging and in poor condition, with many of its components at the end of their useful lives. Since Limestone has acquired the system, it has put measures into place to improve the system’s

¹ *Order Amending Certificate of Public Convenience and Necessity*, TPUC Docket No. 23-00036 (Jan. 6, 2024), pp. 7-8.

² *Limestone’s Initial Report of the Status of Compliance*, TPUC Docket No. 23-00036 (July 25, 2024), pp. 6-7.

functioning and efficacy, but Grasslands continues to be plagued by difficulties caused by its age and condition. Specifically, the facility has significant stormwater inflow and infiltration (I&I) that considerably increases the amount of flow coming into the system, above and beyond what enters the system from customers. Significant rainfall and flooding have also impacted the plant. These factors combined, and exacerbated by the system's poor condition, have led to permit exceedances since the last report in January of this year. The exceedances are limited to ammonia, carbonaceous biochemical oxygen demand, total suspended solids and total residual chlorine, and have been reported and either have been or are being addressed. Each exceedance is due to an extenuating circumstance, in large part heavy rain and flooding.

Since Limestone acquired the Grasslands system, it has been working cooperatively with the Tennessee Department of Environment and Conservation ("TDEC") to upgrade the entire plant. On February 13, 2023, Limestone entered into a Consent Order and Assessment with TDEC, in which Limestone agreed to submit a plan to "address the degraded conditions of treatment structures, laboratory conditions, and observations" outlined in the Consent Order.³ As such, Limestone submitted a proposed schedule for completion to TDEC, which was also filed with Limestone's initial report.⁴ Limestone's plan involves completely replacing the Grasslands system to serve Limestone's customers.

The Commission's 2024 CCN Order specifically amended Limestone's CCN to include the Nash Ridge Subdivision. Nash Ridge is a proposed 39-home development that has not yet been built. Given that the houses are not yet constructed, and Limestone's anticipated schedule for completion of the new system, it is likely that the Grasslands completion will coincide with the

³ *Limestone's Application to Expand its Certificate of Convenience and Necessity to Serve the Nash Ridge Subdivision*, TPUC Docket No. 23-00036 (May 22, 2023), Exhibit 21, Consent Order and Assessment.

⁴ *Limestone's Initial Report of the Status of Compliance*, TPUC Docket No. 23-00036 (July 25, 2024), Exhibit A.

completion of the homes' construction. Even so, and despite the challenges outlined above, it continues to be the opinion of Limestone's engineers that the 39 Nash Ridge homes could be added to the existing, upgraded system. This is because the addition of flow from so few homes is insignificant when compared to the amount currently received at Grasslands and adding Nash Ridge onto the system would not make a discernible difference in its operation.

II. STATUS OF COMPLIANCE WITH SPECIFIED REQUIREMENTS IN THE 2024 CCN ORDER

The Commission's 2024 CCN Order requires Limestone to make the following filings into this docket:

- a. The deed and/or easements for all the land and ownership rights to the wastewater system within fifteen (15) days of being issued and before the first customer is connected to the wastewater system, as set for in the contract submitted by Limestone Water Utility Operating Company, LLC, with the Commission;
- b. Certification from an engineer that Limestone Water Utility Operating Company, LLC, has sufficient capacity to serve the additional customers at the Nash Ridge development prior to new customers being connected to the system;
- c. Copies of all necessary Tennessee Department of Environment and Conservation approved documents relating to the Nash Ridge Development, if any, prior to new customers being connected to the system;
- d. A copy of the as-built plans with signed certification by Limestone Water Utility Operating Company, LLC, indicating the wastewater system has been inspected and is approved to begin operation; and

- e. A copy of the signed plat once the area of development is approved by the City and/or County government within fifteen (15) days of being issued and before the first customer is connected to the wastewater system.

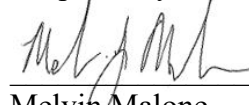
As noted in previous reports, most of these conditions can only be met after the upgrade has been completed, and Limestone will file all the applicable documents as required.

As previously recognized, TDEC's authorization of the subdivision's collection system that will eventually connect to the plant will be needed before any Nash Ridge customers can be connected to Grasslands. A supplemented NPDES permit application was submitted to TDEC on or about June 19, 2025.

III. CONCLUSION

Despite the challenges at Grasslands, many of which began prior to Limestone's acquisition of the plant, Limestone remains committed to persistently addressing these issues and completing a full replacement of the system. Limestone appreciates the opportunity to continue to update the Commission on its compliance with the 2024 CCN Order.

Respectfully submitted,



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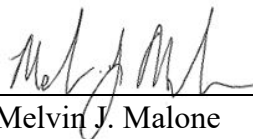
CERTIFICATE OF SERVICE

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

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This the 30th day of June 2025.



Melvin J. Malone