

December 13, 2023

VIA ELECTRONIC FILING

Hon. Herbert H. Hilliard, Chairman c/o Ectory Lawless, Docket Room Manager Tennessee Public Utility Commission 502 Deaderick Street, 4th Floor Nashville, TN 37243 TPUC.DocketRoom@tn.gov Electronically Filed in TPUC Docket Room on December 13, 2023 at 11:30 a.m.

RE: Joint Application of Limestone Water Utility Operating Company, LLC, and Integrated Resource Management, Inc. d/b/a IRM Utility, Inc., for Approval of the Acquisition of and to Operate the Wastewater System of Integrated Resource Management, Inc. d/b/a IRM Utility, Inc., and to Transfer or Issue a Certificate of Public Convenience and Necessity, TPUC Docket No. 23-00037

Dear Chairman Hilliard:

Attached for filing please find a *Joint Proposed Amended Procedural Schedule* in the above-captioned docket.

As required, the original plus four (4) hard 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

Attachments

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC

Chuck B. Welch, Jr., Farris Bobango PLC

Karen H. Stachowski, Consumer Advocate Division

Shilina B. Brown, Consumer Advocate Division

The Pinnacle at Symphony Place 150 3rd Avenue South, Suite 1600 Nashville, TN 37201 MELVIN J. MALONE 615.651.6705 melvin.malone@butlersnow.com

T 615.651.6700 F 615.651.6701 www.butlersnow.com

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

JOINT APPLICATION OF LIMESTONE)	
WATER UTILITY OPERATING)	
COMPANY, LLC, AND INTEGRATED)	
RESOURCE MANAGEMENT, INC. D/B/A)	
IRM UTILITY, INC., FOR APPROVAL OF)	
THE ACQUISITION OF AND TO)	DOCKET NO. 23-00037
OPERATE THE WASTEWATER SYSTEM)	DOCKET 110. 23-00037
OF INTEGRATED RESOURCE)	
MANAGEMENT, INC. D/B/A IRM)	
UTILITY, INC., AND TO TRANSFER OR)	
ISSUE A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

JOINT PROPOSED AMENDED PROCEDURAL SCHEDULE

Jointly comes the Consumer Advocate Division of the Office of the Attorney General ("Consumer Advocate"), Limestone Water Utility Operating Company, LLC, and Integrated Resource Management, Inc., d/b/a/ IRM Utility, Inc. ("Joint Petitioners"), and respectfully submit the following agreed upon Joint Proposed Amended Procedural Schedule in this TPUC Docket No. 23-00037 pursuant to instructions by the Hearing Officer.

Due Date/Deadline	Filing/Activity	
September 7, 2023	Consumer Advocate's 1st Discovery Request	
September 21, 2023	Joint Petitioners' Responses to 1st Discovery Request	
October 2, 2023	Consumer Advocate's 2 nd Discovery Request	
October 14, 2023	Joint Petitioners' Responses to 2 nd Discovery Request	
December 13, 2023	Consumer Advocate's Pre-Filed Testimony	
January 16, 2024	Joint Petitioners' Pre-Filed Rebuttal Testimony	

Due Date/Deadline	Filing/Activity	
January 18, 2024	Pre-Hearing Motions	
January 25, 2024	Pre-Hearing Telephone Status Conference	
February 20, 2024	Target Hearing Date	

- > Nothing herein restricts the Parties from voluntarily participating in additional informal discovery.
- > Copies of all discovery exchanged between the Parties shall be filed with TPUC within 3 business days of the exchange of information.
- > For all spreadsheets, a copy shall be submitted in Excel format with working formulas intact. This includes spreadsheets that are exhibits to Pre-Filed Testimony.
- > Rebuttal Testimony is limited only to issues raised in the Intervenor's Direct Testimony and should include the page and line number of the Intervenor's testimony that is being rebutted.

JOINTLY SUBMITTED FOR ENTRY:

BY:

MELVINS. MALONE (BPR No. 013874)

KATHERINE BARNES (BPR No. 032456)

Butler Snow LLP

The Pinnacle at Symphony Place

150 3rd Avenue South, Suite 1600

Nashville, TN 37201

(615) 651-6700

Melvin.Malone@butlersnow.com

Katherine.Barnes@butlersnow.com

Attorneys for Limestone Water Utility

Operating Company, LLC

RV.

CHARLES B. WELCH (BPR No. 005593) Warmism

Farris Bobango PLC

414 Union Street, Suite 1105

Nashville, TN 37219

(615) 726-1200

cwelch@farris-law.com

Attorneys for Integrated Resource

Management,

Inc. d/b/a IRM Utility, Inc.

BY:

SHILINA B. BROWN (BPR No. 020689)

Assistant Attorney General

KAREN STACHOWSKI (BPR No. 019607)

Deputy Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, TN 37202-0207

(615) 741-2357

Shilina.Brown@ag.tn.gov

Karen.Stachowski@ag.tn.gov

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:

Karen H. Stachowski, Esq.
Deputy Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Karen.Stachowski@ag.tn.gov

Shilina B. Brown, Esq.
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Shilina.Brown@ag.tn.gov

This the 13th day of December 2023.

Melvin J. Malone