

BUTLER | SNOW

September 22, 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
September 22, 2023 at 2:40 p.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*

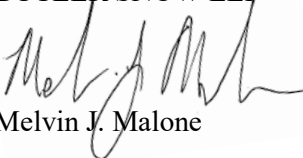
Dear Chairman Hilliard:

Attached for filing please find the *Limestone Water Utility Operating Company, LLC's Supplemental Response DR 1-18 to First Discovery Requests of the Consumer Advocate* as well as the *Verification* to the Responses which were filed on September 21, 2023, 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
 Vance L. Broemel, Consumer Advocate Division
 Karen H. Stachowski, Consumer Advocate Division
 Shilina B. Brown, Consumer Advocate Division

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BUTLER SNOW LLP

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

IN 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)	DOCKET NO. 23-00037
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)	

**LIMESTONE WATER UTILITY OPERATING COMPANY, LLC’S
SUPPLEMENTAL RESPONSE TO FIRST DISCOVERY REQUESTS
OF THE CONSUMER ADVOCATE**

Limestone Water Utility Operating Company, LLC (“Limestone”), by and through counsel, hereby submits its Supplemental Response to 1-18 of the First Discovery Responses propounded by the Consumer Advocate Division of the Attorney General’s Office (“Consumer Advocate”). The supplemental information can be found in Response 1-18(c) and changes the dollar amount to \$30,000 from \$219,999.96 in Limestone’s initial Responses, filed on September 21, 2022.

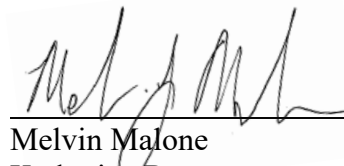
1-18. Refer to the Petition, Exhibit 9, Direct Testimony of Josiah Cox at 13:12-22. Specifically, refer to his discussion of the use of third-party contractors to provide Operating and Maintenance services on behalf of Limestone and provide the following:

- (a) Identify the entity(ies) providing third-party Operating and Maintenance (O&M) services to Limestone's existing systems;
- (b) Provide the annualized cost of such services based upon the current contract in effect; and
- (c) Provide the estimated annual incremental O&M cost accruing to Limestone as a result of this acquisition.

RESPONSE:

- (a) Clearwater Solutions is the only O&M firm currently operating Limestone's systems in Tennessee.
- (b) The annualized cost of such services based upon the current contract in effect is \$462,600.
- (c) The estimated annual incremental O&M cost accruing to Limestone as a result of this acquisition, based on the 2023 budget, is \$30,000.00.

Respectfully submitted,



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*Attorneys for Applicant Limestone Water Utility
Operating Company, LLC*

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

IN 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

DOCKET NO. 23-00037

VERIFICATION

STATE OF Missouri)

COUNTY OF St. Louis)

BEFORE ME, the undersigned, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Eric Rocchio being by me first duly sworn deposed and said that:

He, being duly sworn, verifies that these discovery responses are accurate to the best of his knowledge and ability.



[Signature]

Sworn to and subscribed before me
this 22nd day of SEPTEMBER, 2023.

Reece Gilmore
Notary Public

My Commission expires: Oct 16, 2026



CERTIFICATE OF SERVICE

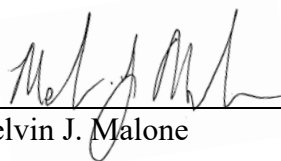
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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This the 22nd day of September 2023.



Melvin J. Malone