

**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**

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**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS  
TO INTEGRATED RESOURCE MANAGEMENT, INC D/B/A IRM UTILITY, INC**

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Pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11, the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, propounds the following discovery requests to Integrated Resource Management, Inc d/b/a IRM Utility, Inc. (“IRM” or the “Company”).

The Company shall serve full and complete responses in accordance with the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Shilina B. Brown, on or before 2:00pm (Central Time), October 13, 2023. The Preliminary Matters and Definitions set forth in the Consumer Advocate’s First Set of Discovery Requests are hereby incorporated by reference as if fully restated herein.

**SECOND SET OF DISCOVERY REQUESTS**

**2-1.** Provide the Company's Annual Reports filed at the Commission for years 2009 thru 2014.

**RESPONSE:**

**2-2.** Provide the approximate date the system was conveyed to the Utility and placed into service.

**RESPONSE:**

**2-3.** Refer to the Company's response Consumer Advocate DR No. 1-1. Specifically, refer to the 2022 Balance Sheet provided. Identify the balances of the assets attributable to the Riverstone Estates System.

**RESPONSE:**

**2-4.** Refer to the Company's response to Consumer Advocate DR Nos. 1-1 through 1-3. When does the Company anticipate that supplemental responses will be provided?

**RESPONSE:**

**RESPECTFULLY SUBMITTED,**



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*In re: Limestone/IRM*

TPUC Docket No. 23-00037

Consumer Advocate's Second Set of Discovery Requests to IRM

**CERTIFICATE OF SERVICE**

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

Charles B. Welch, Jr.  
Farris Bobango PLC  
414 Union St., Suite 1105  
Nashville, TN 37219  
Email: [cwelch@fairris-law.com](mailto:cwelch@fairris-law.com)

Melvin Malone  
Katherine Barnes  
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On this the 6<sup>th</sup> day of October 2023.



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SHILINA B. BROWN  
Assistant Attorney General