

**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)	DOCKET NO. 23-00037
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)	

**IRM UTILITY, INC.'S RESPONSES
TO SECOND DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

IRM Utility, Inc. ("IRM"), by and through counsel, hereby submits its Responses to the Second Discovery Requests propounded by the Consumer Advocate Division of the Attorney General's Office ("Consumer Advocate").

RESPONSES TO SECOND SET OF DISCOVERY RESPONSES

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

RESPONSE: These Annual Reports are on file with the Commission and are a matter of public record. The Company does not have the resources to search its records to locate its copy of the reports in any reasonable period of time.

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

RESPONSE: To the best of the Company's information and belief, the system was conveyed to the company and placed into service during the first quarter of 2011.

- 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: The 2022 Balance Sheet speaks for itself. In further explanation, to the best of the Company's information, \$175,000 was paid to the construction company for delivery of a completed system.

- 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: The information requested is held by the Company's accountant. A request has been made for the information but it has not yet been delivered.

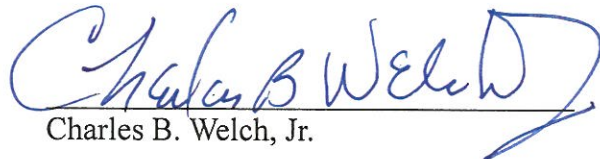
CERTIFICATE OF SERVICE

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:

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On this the 13th day of October, 2023


Charles B. Welch, Jr.