

**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	)	

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

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IRM Utility, Inc. ("IRM"), by and through counsel, hereby submits its Supplemental Responses to the Discovery Requests propounded by the Consumer Advocate Division of the Attorney General's Office ("Consumer Advocate"), specifically Financial Records that were to be provided as available.

**SUPPLEMENTAL RESPONSES TO FIRST SET OF DISCOVERY RESPONSES**

- 1-1. Provide a copy of the Company's Balance Sheet at December 31, 2022, 2021, 2020, and 2019. Specifically, the amounts and any available documentation for Financial Security Surcharge collections.

**SUPPLEMENT RESPONSE:** To the best of the Company's knowledge, there have been no collections for the Financial Security Surcharge.

- 1-2.** Provide a copy of the Company's Income Statement at December 31, 2022, 2021, 2020, and 2019. Specifically, the amounts of any available documentation for collected Security Deposits.

**SUPPLEMENTAL RESPONSE:** Only six security deposits have been collected on behalf of Riverstone since IRM began servicing the system. The security deposits for Riverstone are as follows:

- a. 2/11/2012, James Ramsey, deposit of \$120, disconnected the 2 lots on 1/3/2022
  - b. 2/11/2012, Clay Williams, deposit of \$60, disconnected lot on 11/23/2016
  - c. 2/14/2012, Mark Abel, deposit of \$60, disconnected lot on 5/20/2018
  - d. 1/1/2016, Doug Kibbey, deposit of \$60, disconnected lot on 8/8/2017
  - e. 3/19/2016, Judy Harrison, current customer
  - f. 11/7/2017, Jason Sexton, deposit of \$60, disconnected lot on 6/2/2018
- 1-3.** Provide a copy of the Company's General Ledger at December 31, 2022, 2021, 2020, and 2019. Specifically, the amounts and any available documents for Access Fees collected.

**SUPPLEMENTAL RESPONSE:** All access fees have been applied to Customers' bills. The company will provide any balances which might be available upon receipt of that information from its accountants.

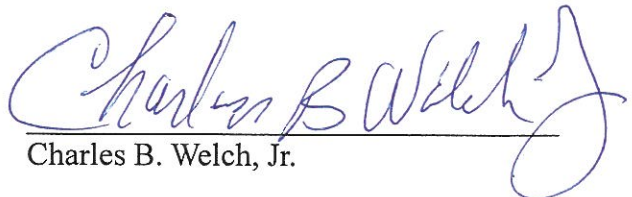
**CERTIFICATE OF SERVICE**

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

Shilina B. Brown  
Assistant Attorney General  
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Deputy Attorney General  
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On this the 3<sup>rd</sup> day of November, 2023

  
Charles B. Welch, Jr.