

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**

1-14. Refer to the Petition, Exhibit 21, IRM Tariff No.1, § 4, First Revised Page 2

(Residential); IRM Tariff, TRA Tariff No.1 § 6, Original Page 1 (Commercial without food); IRM Tariff, TRA Tariff No.1 § 6, Original Page 1.2 (Campground); and IRM

Tariff, TRA Tariff No.1, § 6, First Revised Page 2.1 (Commercial with food). Confirm that IRM assesses a “financial security surcharge” of \$2.87 for residential and commercial customers.

**SUPPLEMENT RESPONSE:** IRM Utility has not itemized a charge for the Financial Security Surcharge on bills to customers in Riverstone Estates.

- 1-21. Refer to Petition, Exhibit 7, Sales Agreement. Confirm that the escrow account associated with Riverstone Estates’ will be transferred as part of the sale. Additionally, provide the Company’s calculation determining the amount of escrowed funds that will be transferred.

**SUPPLEMENTAL RESPONSE:** IRM Utility makes escrow deposits on a regular basis during the course of a year. The escrow deposits are aggregated among all of the IRM systems. IRM Utilities applies non-routine maintenance and repair expenses against the deposits. Over time, the non-routine expenses have significantly exceeded the deposits received. Accordingly, IRM Utility maintains a negligible balance in its escrow bank account due to the non-routine expenses drawn against the deposits. An annual summary of the escrow bank account activity utilized for all systems is included in the Annual Report filed by IRM Utility.

- 1-22. Provide the amount currently held in the escrow account that will be transferred as part of the transaction and explain how this amount was determined.

**SUPPLEMENTAL RESPONSE:** See Supplemental Response 1-22.

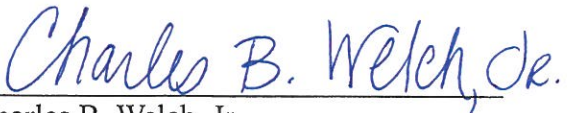
**CERTIFICATE OF SERVICE**

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

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On this the 27<sup>th</sup> day of November, 2023

  
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Charles B. Welch, Jr.