

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

IN RE:)	
)	
Petition of Superior Wastewater Systems,)	
LLC For A Certificate of Convenience and)	DOCKET NO. 23-00051
Necessity To Amend Its Existing Service)	
Territory in Williamson County)	

REPLY OF TENNESSEE WASTEWATER SYSTEMS, INC.

Tennessee Wastewater Systems, Inc. ("TWSI") submits the following reply to the filing made by Superior Wastewater Systems, LLC ("Superior") on August 29, 2023, opposing TWSI's Petition to Intervene in this docket.

1. A portion of the service area requested by Superior is located, according to the Petition, at 4833 Murfreesboro Road, Arrington, TN. This property, which is owned by Mr. Greg Sanford, falls within TWSI's Milcrofton service territory as shown on the map attached as Exhibit 1.¹

2. Neither the property owner nor Superior has contacted TWSI to request that TWSI provide service to the property.

3. TPUC Rule 1220-04-13-.09(4) is not applicable to this situation. TWSI was granted a CCN for the Milcrofton Service Territory in Docket 97-01393. TWSI has provided service within the territory since 1997. The rule does not require that the holder of the CCN provide service to every parcel within the service territory.

¹ TWSI's Petition to Intervene identified two different parcels, also owned by Mr. Greg Sanford, Parcel 113 057.06 000 and Parcel 113 057.09 000. Those parcels are not in TWSI's service territory and were included by mistake. TWSI has explained the error to Mr. Sanford.

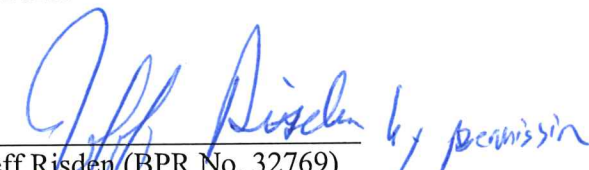
4. As property owners request service within the territory, TWSI evaluates each request and determines whether it can reasonably provide the requested service either through an on-site or regional treatment facility. If TWSI determines that it cannot not provide the requested service at a reasonable cost, TWSI will agree to amend its certificate accordingly.

5. Since no such request has been made regarding the Sanford property at 4833 Murfreesboro Road, TWSI has not yet determined if it can provide the requested service at a reasonable price.


6. In any event, there is no question that TWSI has a legal right to intervene in this docket.

WHEREFORE, TWSI respectfully requests that the Commission enter an Order granting its Petition to Intervene.

Respectfully submitted this 30th day of August 2023.



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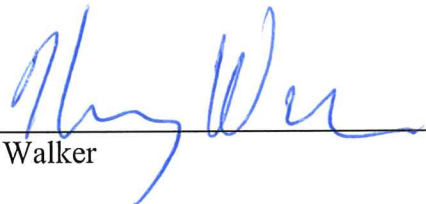
CERTIFICATE OF SERVICE

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 30th day of August 2023.



Henry Walker

