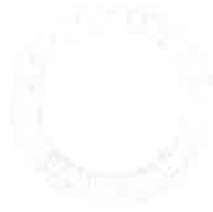


TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

October 12, 2023

Electronically Filed in TPUC Docket
Room on October 12, 2023 at 9:40 a.m.

Jeffrey W. Cox Jr., President
IRM Utility, Inc.
3444 Saint Andrews Drive
White Pine, TN 37890
Sent by email: irmutility@gmail.com

In Re: Docket No. 23-00055, *Petition of Integrated Resource Management, Inc. for a Certificate of Convenience and Necessity.*

Dear Mr. Cox:

To assist the Commission in its ongoing investigation into the above referenced docket, it is requested that responses be provided to the following:

1. Regarding Commission Rule 1220-04-13-.17(2)(a)(4): Does IRM Utility, Inc. have any other affiliate relationships besides that of IRM – C&C? If so, please identify each such affiliate and describe the type of work done for the Utility.
2. Regarding Commission Rule 1220-04-13-.17(2)(a)(7): Please provide the approximate acreage of the proposed development.
3. Regarding Commission Rule 1220-04-13-.17(2)(b)(1): Provide a letter from the Union County government stating its position regarding intent/non-intent to serve the proposed development.
4. Regarding Commission Rule 1220-04-13-.17(2)(c)(4): Please provide proof that the party contracted to install the proposed wastewater system has a valid and current contractor's license in the State of Tennessee.
5. Regarding Commission Rule 1220-04-13-.17(2)(d)(1): Please provide a copy of the application for the State Operating Permit ("SOP") filed with TDEC. Include the letter from TDEC indicating the receipt of the complete application. Include any engineering and/or design reports submitted to TDEC, such as the Design Development Report and the Detailed Soils Investigation Report.
6. Regarding Commission Rule 1220-04-13-.17(2)(d)(2): Please provide a copy of the State Operator Certificate for the wastewater system operator of record.

7. Regarding Commission Rule 1220-04-13-.17(2)(e)(2): On August 11, 2023, IRM Utility, Inc. filed its income statement and balance sheet for the year ending December 31, 2022; the Company also requested this information be treated as confidential. In order to move this docket forward, please refile the information contained in the August 11, 2023 filing as non-confidential. Should the Company refuse to lift the confidentiality of this information, Staff requests that the Company provide a legal brief and/or detailed explanation as to why this information should be treated as confidential. Staff also requests that a statement of cash flows be filed for IRM Utility, Inc. for the year ending December 31, 2022 as non-confidential.
8. Regarding Commission Rule 1220-04-13-.17(2)(e)(3): Please confirm that IRM Utility, Inc. will follow the NARUC Uniform System of Accounts (USOA) for wastewater utilities.
9. Regarding Commission Rule 1220-04-13-.17(2)(e)(7): Provide a detailed breakdown of the estimated amount of contributed capital that will be recorded on the applicant's financial books, including estimated amounts for items such as land, drip fields, collection lines, etc.
10. Regarding Commission Rule 1220-04-13-.17(2)(e)(8): Please provide a revised tariff adding the new development (Paradise Pointe) along with the applicable rates, terms, and conditions of service for the proposed development.
11. Regarding Commission Rule 1220-04-13-.17(2)(e)(11): Demonstrate that the applicant has acquired a performance bond from the developer or builder of the wastewater system made payable to the Utility to ensure the construction of the wastewater system. The performance bond should be for an amount equal to or greater than the cost of the system as provided in contracts between the builder, developer and/or utility.
12. Regarding Commission Rule 1220-04-13-.17(2)(e)(13): Please provide a financial security instrument, compliant with Commission Rule 1220-04-13-.07.

It is requested that all responses be provided no later than 2:00 p.m. on Friday, October 20, 2023. Responses may be submitted electronically at tpuc.docketroom@tn.gov with one hard copy mailed to the Docket Manager at the Tennessee Public Utility Commission, 502 Deaderick Street, 4th Floor, Nashville, Tennessee 37243. Contact Cole McCormick at cole.mccormick@tn.gov or at (615) 770-6871 should you have questions or need clarification of any requested item. Thanks for your attention to this matter.

Sincerely,



David Foster, Director
Utilities Division

C: Charles B. Welch, Jr. (By email to cwelch@fairris-law.com)
Karen Stachowski (By email to Karen.Stachowski@ag.tn.gov)
Docket File