

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>JOINT APPLICATION OF LIMESTONE</b>	)	
<b>WATER UTILITY OPERATING</b>	)	
<b>COMPANY, LLC, SUNSET COVE</b>	)	
<b>CONDOMINIUM HOA OF NORRIS</b>	)	
<b>LAKE, INC. AND COMMERCIAL</b>	)	<b>DOCKET NO. 23-00070</b>
<b>BANK FOR APPROVAL OF THE</b>	)	
<b>ACQUISITION OF AND TO OPERATE</b>	)	
<b>THE WASTEWATER SYSTEM OF</b>	)	
<b>SUNSET COVE CONDOMINIUM HOA</b>	)	
<b>OF NORRIS LAKE, INC. AND</b>	)	
<b>COMMERCIAL BANK AND TO ISSUE</b>	)	
<b>A CERTIFICATE OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	

---

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS  
TO LIMESTONE WATER UTILITY OPERATING COMPANY, LLC**

---

Pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11, the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, propounds the following discovery requests to Limestone Water Utility Operating Company, LLC (“Limestone” or the “Company”).

The Company shall serve full and complete responses in accordance with the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Shilina B. Brown, on or before 2:00 pm (Central Time), December 14, 2023. The Preliminary Matters and Definitions set forth in the Consumer Advocate’s First Set of Discovery Requests are hereby incorporated by reference as if fully restated herein.

**SECOND SET OF DISCOVERY REQUESTS**

- 2-1.** Refer to the Company's response to Consumer Advocate DR No. 1-6. Provide the anticipated number of residential customers that will be billed under the consolidated bill that will be sent by Limestone to the Sunset Cove HOA.

**RESPONSE:**

- 2-2.** Refer to the Company's response to Consumer Advocate DR No. 1-6. Does the Company intend to provide a means for the individual condominium owners to easily contact the utility when there is a service issue or when a customer has a complaint? If so, how does the company intend to achieve this since there will be a consolidated bill structure where Limestone will only bill the HOA. Will each owner be provided access to Limestone's customer portal? If the Company does not intend for individual condominium owners to have the ability to contact Limestone, provide the Company's rationale for not providing each individual customers an individual customer facing portal to address service issues or customer complaints.

**RESPONSE:**

- 2-3.** Refer to the Company's response to Consumer Advocate DR No. 1-6. Address the following hypothetical situation: if individual owners of the units served by the Company stop paying their Homeowners Association (HOA) dues, this could potentially impact the ability of the HOA to pay the bill due to the Company. In the event of nonpayment of the bill by the HOA, will the Company discontinue providing services to all individual condominium owners? How will the Company handle this type of situation? Please provide a detailed explanation of discontinuance of services/shutoff policies.

**RESPONSE:**

2-4. Refer to the response to Consumer Advocate DR No. 1-13. In the Company's response, the Company identified the public interest implications of the acquisition on both current and future Limestone customers in the area of operational efficiencies. However, the response does not address the implications of this transaction on existing Limestone customers resulting from absorbing the capital expenditures required from this transaction into the composite Limestone Rate Base. Please discuss how the transaction meets the public interest standard for existing Limestone customers relative to the implications of this transaction on the overall Limestone Rate Base.

**RESPONSE:**

**RESPECTFULLY SUBMITTED,**



---

SHILINA B. BROWN (BPR No. 020689)

Assistant Attorney General

VICTORIA B. GLOVER (BPR No. 037954)

Assistant Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Telephone: (615) 741-2357

Email: [shilina.brown@ag.tn.gov](mailto:shilina.brown@ag.tn.gov)

Email: [victoria.glover@ag.tn.gov](mailto:victoria.glover@ag.tn.gov)

*In re: Limestone/IRM*

TPUC Docket No. 23-00070

Consumer Advocate's Second Set of Discovery Requests to Limestone/CSWR

**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:

Melvin Malone  
Katherine Barnes  
Butler Snow LLP  
The Pinnacle at Symphony Place  
150 Third Avenue South, Suite 1600  
Nashville, TN 37201  
Phone: (615) 651-6700  
Email: [Melvin.Malone@butlersnow.com](mailto:Melvin.Malone@butlersnow.com)  
Email: [Katherine.Barnes@butlersnow.com](mailto:Katherine.Barnes@butlersnow.com)

Josiah Cox  
1630 Des Peres Road, Suite 140  
St. Louis, MO 63131  
Phone: (314) 380-8544  
Email: [regulatory@cswrgroup.com](mailto:regulatory@cswrgroup.com)

Eddie Castles, President  
Sunset Cove Condominium HOA of Norris Lake, Inc.  
200 Sunset Coves Drive  
Maynardville, TN 37807  
Email: [ccastles\\_8721@fuse.net](mailto:ccastles_8721@fuse.net)

Adam Robertson, President  
Commercial Bank  
6710 Cumberland Gap Parkway,  
Harrogate, TN, 37752  
Phone: (423)869-5151  
Email: [arobertson@cbtn.com](mailto:arobertson@cbtn.com)

Gregory C. Logue, Esq.  
Woolf - McClane  
P.O. Box 900  
Knoxville, TN 37243  
Phone: (865) 215-1000  
Email: [GLogue@wmbac.com](mailto:GLogue@wmbac.com)

On this the 30<sup>th</sup> day of November 2023.



---

SHILINA B. BROWN  
Assistant Attorney General