

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

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

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO SUNSET COVE CONDOMINIUM HOA OF NORRIS LAKE, INC AND
COMMERCIAL BANK**

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 Sunset Cove Condominium HOA of Norris Lake, Inc. and Commercial Bank (Individually “Sunset Cove,” or “Commercial Bank” and together the “Sellers”).

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 Nos. 1-8 & 1-9. Identify the certified operator who operates and maintains the system. Additionally, provide the prior year costs for those services.

RESPONSE:

2-2. Refer to the Company's response to Consumer Advocate DR No. 1-8. The HOA maintenance fees for Sunset Cove Condominium are currently \$300 per month. How much of the \$300 per month HOA dues paid by each individual condominium owner is allocated to pay for wastewater services?

RESPONSE:

RESPECTFULLY SUBMITTED,



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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, with a courtesy copy by electronic mail, upon:

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On this the 30th day of November 2023.



SHILINA B. BROWN
Assistant Attorney General