

**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 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**

**Docket No. 23-00070**

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

Comes Commercial Bank, by and through counsel, and Sunset Cove Condominium HOA of Norris Lake, Inc., pursuant to Tennessee Rules of Civil Procedure 26, 33, 34, and 36, and Tenn. Comp R. & Reg. 1220-01-02-.11, and responds to the Consumer Advocate's Second Set of Discovery Requests as follows:

**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:** As was stated on page 4 of the Appendix to the Joint Application, Sunset Cove does not have a current state operator certificate for a wastewater system operator. The system's permit expired and has not been renewed by TDEC. Therefore, there are no prior year costs for an operator.

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:** No part of the 2023 \$300.00 per month HOA maintenance fees paid to the HOA by each individual condominium owner is allocated to pay for wastewater services. However, once a permit is obtained and an operator approved, the monthly expense for the cost of wastewater services will be allocated pro rata to each individual condominium owner. The HOA has approved a budget for 2024 of \$400.00 per month per unit which includes a line item for septic system operation costs for the entire condominium project of \$6,500.00.

Respectfully submitted this 14th day of December, 2023.

**OATH**

I, Eddie Castles, President of Sunset Cove Condominium HOA of Norris Lake, Inc., makes oath that the foregoing Responses to Consumer Advocate's Second Set of Discovery Requests are true to the best of my knowledge, information and belief.

SUNSET COVE CONDOMINIUM HOA OF  
NORRIS LAKE, INC.

By:   
Eddie Castles, President

STATE OF TENNESSEE     )  
COUNTY OF \_\_\_\_\_ )

Before me, a Notary Public in and for the state and county aforesaid, personally appeared EDDIE CASTLES, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who, upon oath, acknowledged himself to be the President of SUNSET COVE CONDOMINIUM HOA OF NORRIS LAKE, INC., the within named bargainor, a corporation, and that he, as such President, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself as President.

Witness my hand and seal, this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
Notary Public

My Commission Expires:  
\_\_\_\_\_

**OATH**

I, Adam Robertson, President of Commercial Bank, makes oath that the foregoing Responses to Consumer Advocate's Second Set of Discovery Requests are true to the best of my knowledge, information and belief.

COMMERCIAL BANK

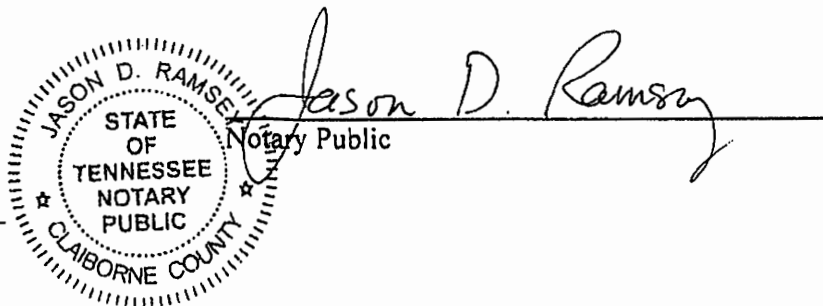
By: Adam Robertson  
Adam Robertson, President

STATE OF TENNESSEE )  
COUNTY OF Claiborne )

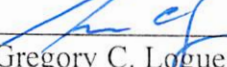
Before me, a Notary Public in and for the state and county aforesaid, personally appeared ADAM ROBERTSON, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who, upon oath, acknowledged himself to be the President of COMMERCIAL BANK, the within named bargainer, a corporation, and that he, as such President, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself as President.

Witness my hand and seal, this 13 day of December, 2023.

My Commission Expires:  
9/26/2027



WOOLF, McCLANE, BRIGHT,  
ALLEN & CARPENTER, PLLC

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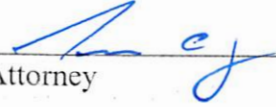
**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing Responses has been served upon the following counsel for the parties in interest herein by electronic mail and by mailing same to the offices of said counsel by United States Mail with sufficient postage thereon to carry the same to its destination.

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Dated this the 14<sup>th</sup> day of December, 2023.

  
\_\_\_\_\_  
Attorney