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January 25, 2024

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Room on January 25, 2024 at 1:43 p.m.

Hon. Herbert H. Hilliard, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

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, TPUC Docket No. 23-00070*

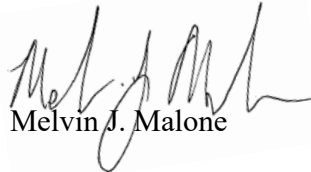
Dear Chairman Hilliard:

Attached for filing please find the *Rebuttal Testimony of Josiah Cox* in the above-referenced docket.

As required, the original plus four (4) hard copies will be mailed to your office. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachment

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Eddie Castles, Sunset Cove Condo HOA of Norris Lake, Inc.
Adam Robertson, Commercial Bank
Gregory Logue, Commercial Bank
Shilina B. Brown, Consumer Advocate Division
Victoria B. Glover, Consumer Advocate Division

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REBUTTAL TESTIMONY

OF JOSIAH COX

LIMESTONE WATER UTILITY OPERATING COMPANY, LLC

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Josiah Cox. My business address is 1630 Des Peres Road, Suite 140, St. Louis
3 Missouri, 63131.

4 **Q. WHAT IS YOUR POSITION WITH LIMESTONE WATER UTILITY**
5 **OPERATING COMPANY, LLC (“LIMESTONE” OR “COMPANY”)?**

6 A. I am President of Limestone. I also am President of CSWR, LLC (“CSWR”), a Limestone
7 affiliate.

8 **Q. DID YOU SUBMIT PRE-FILED TESTIMONY IN THIS MATTER ON BEHALF**
9 **OF LIMESTONE IN SUPPORT OF THE JOINT APPLICATION.**

10 A. Yes. I submitted Pre-filed Direct and Supplemental Direct Testimony.

11 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS CASE?**

12 A. The purpose of my Rebuttal Testimony is to support the Joint Application submitted in this
13 matter by both Limestone, Sunset Cove Condominium HOA of Norris Lake, Inc. (“Sunset
14 Cove”), and Commercial Bank, collectively the “Joint Applicants,” by responding to the
15 Pre-filed Testimony of Consumer Advocate Witness David Dittimore.

16 **Q. DOES MR. DITTEMORE ON BEHALF OF THE CONSUMER ADVOCATE**
17 **RECOMMEND APPROVAL OF THE JOINT APPLICANTS’ REQUEST FOR**
18 **APPROVAL OF THE ACQUISITION?**

19 A. As outlined on page 4 of his testimony, Mr. Dittimore recommends that the Commission
20 approve Limestone’s proposal as follows:

1. Authority to acquire the assets of Sunset Cove for the nominal amount of \$1, subject to the Company obtaining all necessary permits and other operating authorizations from the Tennessee Department of Environmental Conservation (“TDEC”).
2. The adoption of the proposed monthly customer charge of \$30.73 per month applied to each member of Sunset’s Homeowner’s Association (“HOA”). As referenced in Supplemental Testimony, the Company does not request to charge an escrow fee at this time.⁷
3. The determination of whether any regulatory and/or transaction costs are eligible for recovery from customers will be determined in the Company’s initial rate case filing. Such costs should be set aside in Account 183, for ease of reference in future proceedings. The Company has committed that it will not seek recovery in rates more than 50% of the legal costs incurred in this proceeding.⁸
4. The proposal to adopt the depreciation rates of Limestone should be approved. The acceptance of the existing depreciation rates of Limestone⁹ should not be used as evidence of the reasonableness of such rates in a future rate proceeding.

(For ease of reference, I have included Mr. Dittemore’s footnotes just as they appear in his testimony.)

Q. WHAT IS LIMESTONE’S RESPONSE TO THE FOUR (4) ITEMS PROPOSED BY MR. DITTEMORE ON PAGE 4 OF HIS TESTIMONY AS SET FORTH ABOVE?

A. The four (4) above-referenced items outlined by Mr. Dittemore are consistent with the Joint Application. Limestone accepts the Consumer Advocate’s language in item No. 3 above that “[s]uch costs should be set aside in Account 183[.]” Further, Limestone accepts the Consumer Advocate’s language in item No. 4 above that “[t]he acceptance of the existing

⁷ *Id.* at 3:6-12.

⁸ *Joint Application*, p. 10, TPUC Docket No. 23-00070 (September 15, 2023).

⁹ *Joint Application*, Appendix A, pp. 5-6 and Exhibit 20. The Company states in Appendix A that it seeks adoption of the depreciation the Commission has approved for IRM, as reflected in IRM’s annual report attached as Exhibit 20. However, Exhibit 20 contains the financial statements of Limestone, not of IRM. It is more logical that the Commission adopt the existing depreciation rates of Limestone in this proceeding. For purposes of my testimony, I am assuming the Company is seeking adoption of the Limestone depreciation rates as set forth in its Exhibit 20 to be applied to the operations of Sunset Cove going forward. *Id.*

1 depreciation rates of Limestone should not be used as evidence of reasonableness of such
2 rates in a future rate proceeding.”

3 **Q. DOES MR. DITTEMORE RECOMMEND FURTHER PROPOSALS IN HIS**
4 **TESTIMONY?**

5 A. Yes. On page 5 of his testimony, Mr. Dittmore also recommends the adoption of the
6 following provisions:

- 7 1. The Company should provide its proposed accounting entries at the
8 time of the acquisition for review and approval by the Commission.
9 The submission should be made within this docket and a copy
10 provided to the Consumer Advocate.
- 11 2. The Commission should require the Company to identify and
12 provide the financial statements of the Wall Street private equity
13 firm referenced in the testimony of Mr. Cox.
- 14 3. The Commission should require future wastewater applications to
15 address the revenue requirement implications of the acquisition on
16 existing Limestone customers, assuming the Commission adopts
17 consolidated rates. The Company should be required to submit an
18 analysis estimating the revenue requirement of the acquired system
19 after all necessary capital expenditures have been made.
- 20 4. The Commission should open an investigation into whether rate
21 consolidation is in the public interest. The determination of this
22 issue should then be incorporated into the definition of public
23 interest in the evaluation of wastewater acquisitions.

24 **Q. WHAT IS LIMESTONE’S RESPONSE TO THE FOUR (4) ITEMS PROPOSED BY**
25 **MR. DITTEMORE ON PAGE 5 OF HIS TESTIMONY AS SET FORTH**
26 **DIRECTLY ABOVE?**

27 A. As explained in more detail below, it is Limestone’s position that these four (4) provisions
28 should not be adopted in this proceeding.

1 **Q. WHAT IS LIMESTONE’S POSITION ON THE FIRST PROVISION**
2 **RECOMMENDED BY MR. DITTEMORE?**

3 A. The first provision is as follows:

- 4 1. The Company should provide its proposed accounting entries at the
5 time of the acquisition for review and approval by the Commission.
6 The submission should be made within this docket and a copy
7 provided to the Consumer Advocate.

8 Limestone does not believe that requiring it to submit the proposed accounting entries at
9 the time of the acquisition for review and approval by the Commission is necessary. To the
10 extent necessary, a review of any proposed accounting entries for the acquisition may be
11 performed in Limestone’s initial rate case proceeding involving the assets acquired.

12 In its recent *Order Approving Settlement Agreement and Transfer of System, and*
13 *Granting Certificate of Convenience and Necessity*, in TPUC Docket No. 23-00016 (Dec.
14 26, 2023), the Commission did not require Limestone to submit its proposed accounting
15 entries at the time of the acquisition for review and approval by the Commission.
16 Moreover, the Commission “found that the Settlement Agreement includes terms that
17 require compliance with accounting procedures that are needed to assist in the analytical
18 review of transactions.”¹⁰ The Settlement Agreement in TPUC Docket No. 23-00016 does
19 not contain a requirement that Limestone submit the proposed accounting entries at the
20 time of the acquisition for review and approval by the Commission. Similarly, in the
21 Stipulation and Settlement Agreement between Limestone and the Consumer Advocate in
22 TPUC Docket No. 21-00059 (Candlewood), the parties did not include any requirement

¹⁰ *Order Approving Settlement Agreement and Transfer of System, and Granting Certificate of Convenience and Necessity*, p. 12, TPUC Docket No. 23-00016 (Dec. 26, 2023).

1 that prospective accounting entries for the acquisition be submitted prior to closing for
2 Commission approval.¹¹

3 As recognized by the Commission in other Limestone acquisition proceedings, the
4 commitments set forth in the Joint Application in this matter include terms that require
5 compliance with accounting procedures that are needed to assist in the analytical review of
6 transactions.

7 **Q. WHAT APPEARS TO BE THE UNDERLYING BASES OR CONCERN OF THIS**
8 **RECOMMENDATION?**

9 A. On page 9 of his testimony, Mr. Dittemore references a discovery response in which
10 “Limestone stated that it does not intend to restate its account balances resulting from the
11 transaction at a later date and provided a pro-forma accounting entry within its response.”
12 Apparently based on this response, Mr. Dittemore recommends that if Limestone intends
13 to make any changes in account balances that those changes be “supplied to the
14 Commission within this docket upon closing, for Commission approval.”

15 **Q. WHAT IS YOUR RESPONSE TO MR. DITTEMORE RECOMMENDATION?**

16 A. Limestone believes Mr. Dittemore’s recommendation is both impractical and unnecessary.
17 While Limestone intends to record at closing all account balances provided by Sunset
18 Cove, it is possible that after closing Limestone may identify errors in those balances. If
19 that is the case, Limestone reserves the right to seek the Commission’s permission to make
20 necessary changes. Those changes and any accounting entries recorded at closing can be
21 reviewed by the Commission in Limestone’s initial rate case proceeding involving the
22 assets acquired. There is no need to review those accounting entries prior to closing.

¹¹ See, e.g., *Stipulation and Settlement Agreement*, TPUC Docket No. 21-00059 (Aug. 19, 2022).

1 **Q. WHAT IS LIMESTONE’S POSITION ON THE SECOND PROVISION**
2 **RECOMMENDED BY MR. DITTEMORE?**

3 A. The second provision is as follows:

4 2. The Commission should require the Company to identify and
5 provide the financial statements of the Wall Street private equity
6 firm referenced in the testimony of Mr. Cox.

7 It is Limestone’s position that the Commission should not require Limestone to identify
8 and provide the financial statements of the Wall Street private equity firm referenced in
9 my Pre-filed Direct Testimony. Based upon the required, appropriate, and adequate
10 information previously submitted to the Commission, the Commission has previously, and
11 recently, determined that Limestone possesses the requisite financial capability.¹²

12 **Q. IN HIS TESTIMONY, DOES MR. DITTEMORE PROVIDE ANY SUPPORT**
13 **THAT LIMESTONE IS NOT FINANCIALLY CAPABLE?**

14 A. No, he does not. In fact, on page 11, lines 1-5 of his testimony, Mr. Dittemore notes that
15 “CSWR continues to expand the scope of its operations. Therefore, it would appear that
16 the private equity firm has thus far provided the necessary financial support to operate its
17 various systems.”

¹² See *Order Approving Sale of Assets, Property, and Real Estate and Certificate of Public Convenience of Aqua Utilities Company, LLC Subject to Conditions and Requirements of the Tennessee Public Utility Commission*, TPUC Docket No. 19-00062 (Dec. 7, 2020); *Order Approving Settlement Agreement and Transfer of Systems, and Granting Certificate of Convenience and Necessity*, TPUC Docket No. 21-00053 (Jan. 24, 2022) (acquisition of wastewater system previously owned by Cartwright Creek, LLC); *Order Approving Settlement Agreement and Transfer of Systems and Granting Certificate of Convenience and Necessity*, TPUC Docket No. 21-00055 (Dec. 2, 2022) (acquisition of water and wastewater system previously owned by Shiloh Falls Utilities, Inc.); *Order Approving Settlement Agreement and Transfer of System and Granting Certificate of Convenience and Necessity*, TPUC Docket No. 21-00060 (Dec. 2, 2022) (acquisition of wastewater system previously owned by Chapel Woods Home Owners Association); *Order Approving Petition for Reconsideration of Commission Order Approving Settlement Agreement and Transfer of Systems, Granting Certificate of Convenience and Necessity, and Disallowing Continuation of Candlewood Lakes POA’s Water Availability Fee*, TPUC Docket No. 21-00059 (Commission approving acquisition and granting CCN to Limestone) (May 1, 2023); and *Order Approving Settlement Agreement and Transfer of System, and Granting Certificate of Convenience and Necessity*, TPUC Docket No. 23-00016 (Dec. 26, 2023).

1 **Q. ARE THERE OTHER REASONS THAT LIMESTONE OPPOSES THIS**
2 **RECOMMENDATION?**

3 A. Yes. Among other reasons that Limestone opposes this recommendation is that neither
4 Limestone nor its affiliates possess the audited financial statements of the Wall Street
5 private equity firm referenced in my Pre-filed Direct Testimony. or know whether such
6 audited financial statements exist.

7 **Q. WHAT IS LIMESTONE'S POSITION ON THE THIRD PROVISION**
8 **RECOMMENDED BY MR. DITTEMORE?**

9 A. The third provision is as follows:

- 10 3. The Commission should require future wastewater applications to
11 address the revenue requirement implications of the acquisition on
12 existing Limestone customers, assuming the Commission adopts
13 consolidated rates. The Company should be required to submit an
14 analysis estimating the revenue requirement of the acquired system
15 after all necessary capital expenditures have been made.

16 It is Limestone's position that the Commission should not require future wastewater
17 applications to address the revenue requirement implications of the acquisition on existing
18 Limestone customers, assuming the Commission adopts consolidated rates. Further, the
19 Company should not be required to submit an analysis estimating the revenue requirement
20 of the acquired system after all necessary capital expenditures have been made.

21 As noted by the Commission's actions in other Limestone acquisition proceedings,
22 the only rates the Commission should consider in determining whether an acquisition is in
23 the public interest are those that would be in effect immediately after closing. Future rates
24 – i.e., those that may be set by the Commission in a future rate case – are not immediately
25 relevant to the determination of whether an acquisition application should be granted. As
26 the approval of the Joint Application will have no impact on existing customer rates and

1 would establish a reasonable rate for Sunset Cove, the Commission should not take Mr.
2 Dittemore's speculation on future rates into account. The questions presented here are
3 whether Limestone is technically, managerially, and financially qualified to own and
4 operate the Sunset Cove system as a regulated public utility and whether the proposed
5 transaction is in the public interest. Furthermore, the Commission should not consider Mr.
6 Dittemore's future rates testimony because the underlying estimates are based on
7 assumptions regarding all elements of ratemaking – revenue, expenses, rate base, capital
8 structure, rate of return, rate design, etc. – that may or may not be valid.

9 In its Responses to CAD DR 1-13 and CAD DR 2-4, Limestone addressed the
10 Consumer Advocate's public interests and consolidation inquiries. Based on the experience
11 of our affiliate group in states outside Tennessee, where such rates have been approved,
12 consolidated rates are an effective mechanism to mitigate "rate shock" that otherwise
13 would result when small, undercapitalized, and mismanaged system are acquired by
14 experienced and technically competent owners that invest the capital required to address
15 needed capital improvements in those systems to provide safe and reliable service. Where
16 adopted, consolidated rates allow all customers within a state to share the benefits of
17 economics of scale our affiliated group can achieve. Consolidated rates also help spread
18 out the rate impact of required capital investments that have greater impacts on some
19 systems in the short term but that will affect all systems in the long run.

20 **Q. SHOULD THE COMMISSION CONSIDER FUTURE RATE IMPACTS IN**
21 **REACHING A DECISION IN THIS CASE?**

22 A. No. The impact on future rates of Limestone's acquisition of the Sunset Cove system is not
23 known or measurable. Therefore, it would be inappropriate, unreasonable, and premature

1 for the Commission to consider that issue in the current proceeding. Moreover, as a
2 regulated utility, Limestone is prohibited by law from changing rates until such a change
3 is authorized by the Commission, and no change in rates can be approved by the
4 Commission without a thorough consideration of a utility's rate change request, with full
5 opportunity for interested parties – including the Consumer Advocate – to present evidence
6 and arguments regarding that request. Hence, it serves no purpose for the Commission to
7 consider hypothetical future rate impacts in this acquisition case. Similar to the issue of an
8 acquisition adjustment and inclusion of due diligence costs in rates, the issue of rates should
9 be deferred to a future rate case proceeding where information is known and measurable
10 and all parties can present evidence relevant to ratemaking.

11 **Q. WHAT IS LIMESTONE'S POSITION ON THE FOURTH PROVISION**
12 **RECOMMENDED BY MR. DITTEMORE?**

13 A. The fourth provision is as follows:

- 14 4. The Commission should open an investigation into whether rate
15 consolidation is in the public interest. The determination of this
16 issue should then be incorporated into the definition of public
17 interest in the evaluation of wastewater acquisitions.

18 It is Limestone's position that the Commission should not open an investigation into
19 whether rate consolidation is in the public interest. The issues involving consolidation of
20 rates may vary from industry to industry and from company to company. A generic inquiry
21 into consolidated rates may or may not yield fruitful information to the Commission. Even
22 should the Commission wish to consider whether such a generic inquiry on consolidated
23 rates is appropriate absent any company-specific request for consolidated rates, there is no
24 justifiable reason for such a consideration to occur or for such a decision to be made in an
25 acquisition proceeding in which there is limited participation.

1 **Q. AS NOTED IN PAGES 16-17 OF HIS TESTIMONY, DO YOU AGREE WITH MR.**
2 **DITTEMORE’S CONCERNS REGARDING THE CONSIDERATION OF A**
3 **CONSOLIDATED RATES PROPOSAL WITHIN A FUTURE RATE CASE?**

4 A. No. Rate cases are detailed, and sometimes complex, matters by their nature. Consolidation
5 aside, old and new issues – some anticipated, some not anticipated, some simple, some
6 novel – arise that must be addressed. Generally, as regulated rates must be addressed within
7 a rate case, a proposal for consolidated rates is usually a component of a rate case. I also
8 would note that Limestone’s affiliates in Missouri, Mississippi, Louisiana, Kentucky, and
9 Texas each included a proposal to consolidate rates in the initial rate case filed in those
10 states, and regulators believed the evidence provided was sufficient to enable them to
11 approve consolidated rates as part of their final rate orders or recommended orders.

12 **Q. AS NOTED ON PAGE 17 OF HIS TESTIMONY, DO YOU AGREE WITH MR.**
13 **DITTEMORE’S DECLARATION THAT LIMESTONE WOULD NOT PROVIDE**
14 **RELEVANT INFORMATION WITH RESPECT TO EACH SYSTEM? IF NOT,**
15 **PLEASE EXPLAIN.**

16 A. I disagree with Mr. Dittemore’s declaration. All capital investment and most operating
17 expenses are recorded to accounts for the system to which they relate. Those costs not
18 recorded in that manner are allocated based on CSWR’s and Limestone’s Cost Allocation
19 Manual. Therefore, it would be possible for Limestone, the CAD, and any intervenors in a
20 future Limestone rate case to determine and compare the potential customer impacts of
21 system-specific and consolidated rates.

22 **Q. ON PAGE 20 OF HIS TESTIMONY, MR. DITTEMORE ASKS “WHAT WOULD**
23 **OCCUR IF ONLY HALF OF THE HOMEOWNERS PAID THEIR MONTHLY**

**RATE, AND SUNSET HOA DID NOT HAVE THE FUNDS TO COVER THE
REMAINING BILL FROM LIMESTONE?” CAN YOU ADDRESS THIS PLEASE?**

A. Yes. Limestone addressed this question in its Response to CAD DR 2-3, as set forth below:

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: As set forth in the Amended and Clarified Joint Petition, Limestone intends to provide service to and bill a single customer – the HOA – that would be responsible for paying the sewer service bill. If, under the hypothetical posed in this request, individual condominium residents failed to pay their HOA charges, it would be up to the HOA to address that situation through normal mechanisms typically established in the HOA bylaws, including property liens. Any action taken by Limestone to address a failure to pay by the HOA will be consistent with Limestone’s tariffs, the Commission’s rules and regulations, and state law.

**Q. ON PAGE 20 OF HIS TESTIMONY, MR. DITTEMORE ASKS, “IF AN
INDIVIDUAL HOMEOWNER IS HAVING A WASTEWATER SERVICE
PROBLEM, CAN THE INDIVIDUAL CONTACT LIMESTONE DIRECTLY OR
MUST IT GO THROUGH THE ‘CUSTOMER,’ SUNSET COVE? CAN YOU
ADDRESS THIS PLEASE?**

A. Yes. Limestone addressed this question in its Response to CAD DR 2-2, as set forth below:

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

1 individual customer facing portal to address service issues or customer
2 complaints.

3 RESPONSE: As clarified in the Amended and Clarified Joint Petition,
4 Sunset Cove HOA will be Limestone's customer. At closing, Limestone
5 will provide Sunset Cove HOA with a Welcome Letter containing
6 information regarding a dedicated service line (1-855-723- 4 84970828.v1
7 2450) that customers can use to contact Limestone. In addition to calling
8 the previously mentioned toll-free service number, the HOA may contact
9 Limestone by sending an email to customer service
10 (support@limestonewateruoc.com). The toll-free number and the website
11 /email are available 24/7. Dedicated third-party customer service personnel
12 are available during regular business hours to address customer concerns
13 (M-F 7:00 am - 7:00 pm). Additionally, Limestone's main office is open
14 from 8:00 am to 5:00 pm M-F to respond to customer concerns escalated by
15 operations or customer service personnel.

16 Limestone does not possess documents regarding the structure of Sunset Cove
17 HOA. It may be that the individual condominium owners are, or can become,
18 members of Sunset Cove HOA.

19 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

20 **A.** Yes, it does.

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS)

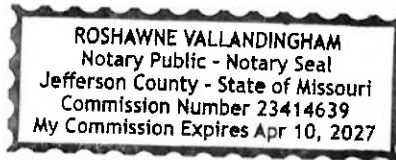
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Josiah Cox, being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of Limestone Water Utility Operating Company, LLC before the Tennessee Public Utility Commission, and if present before the Commission and duly sworn, his testimony would be as set forth in his pre-filed testimony in this matter.

JOSIAH COX

Sworn to and subscribed before me
this 24th day of January, 2024.

Roshawne Vallandingham
Notary Public



My Commission Expires: 04-10-2027

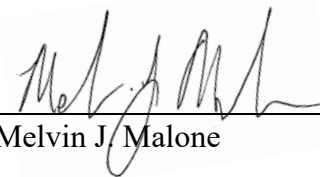
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Shilina B. Brown, Esq.
Assistant Attorney General
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Victoria B. Glover, Esq.
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This the 25th day of January 2024.



Melvin J. Malone