

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

IN RE:)	
)	
JOINT APPLICATION OF LIMESTONE)	
WATER UTILITY OPERATING)	
COMPANY, LLC, AND CUMBERLAND)	
BASIN WASTEWATER SYSTEMS, LLC)	
FOR APPROVAL OF THE)	DOCKET NO. 23-00077
ACQUISITION OF AND TO OPERATE)	
THE WASTEWATER SYSTEM OF)	
CUMBERLAND BASIN WASTEWATER)	
SYSTEMS, LLC, AND TO ISSUE A)	
CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO CUMBERLAND BASIN WASTEWATER SYSTEMS, 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 Cumberland Basin Wastewater Systems, LLC (“Cumberland Basin” 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 2:00pm (Central Time), June 7, 2024. 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. 1-18. Have Exhibits A-D to the Sales Agreement been finalized? If so, provide those finalized Exhibits. If not, provide an estimated date of finalization.

RESPONSE:

2-2. Provide the Company's Balance Sheet at December 31, 2023.

RESPONSE:

2-3. Provide the Company's Income Statement at December 31, 2023.

RESPONSE:

2-4. Provide the Company's General Ledger at December 31, 2023.

RESPONSE:

RESPECTFULLY SUBMITTED,



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In re: Limestone / Cumberland Basin

TPUC Docket No. 23-00077

Consumer Advocate's Second Set of Discovery Requests to Cumberland Basin

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
Email: Katherine.Barnes@butlersnow.com

Cumberland Basin Wastewater Systems, LLC
c/o Tim Huddleston
150 Construction Drive
Livingston, TN 38570
Phone: (931) 403-1000
Email: thuddleston@wocc.com

On this the 28th day of May, 2024.



SHILINA B. BROWN
Assistant Attorney General