

BUTLER | SNOW

February 9, 2024

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on February 9, 2024 at 1:28 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, and Cumberland Basin Wastewater Systems, LLC, for Approval of the Acquisition of and to Operate the Wastewater System of Cumberland Basin Wastewater Systems, LLC, and to Issue a Certificate of Public Convenience and Necessity, TPUC Docket No. 23-00077*

Dear Chairman Hilliard:

Attached for filing please find responses from Limestone Water Utility Operating Company, LLC to the Consumer Advocate's inquiry and requests regarding the minimum filing requirements 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.

Sincerely,

BUTLER SNOW LLP



Katherine Barnes

Attachment

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Tim Huddleston, Cumberland Basin Wastewater Systems, LLC
David Woodsmall, Central States Water Resources
Shilina Brown, Consumer Advocate Division

*The Pinnacle at Symphony Place
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BUTLER SNOW LLP

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February 9, 2024

VIA EMAIL

Shilina B. Brown
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202
Shilina.Brown@ag.tn.gov

RE: *Joint Application of Limestone Water Utility Operating Company, LLC, and Cumberland Basin Wastewater Systems, LLC, for Approval of the Acquisition of and to Operate the Wastewater System of Cumberland Basin Wastewater Systems, LLC, and to Issue a Certificate of Public Convenience and Necessity, TPUC Docket No. 23-00077*

Dear Ms. Brown:

We are in receipt of your inquiry and requests regarding the minimum filing requirements in the above-referenced docket. Please find the responses from Limestone Water Utility Operating Company, LLC (“Limestone”), below.

ATTACHMENT A – CCN MFRs

Rule 1220-04-13-.17(2)(a) General Information

1. *Rule 1220-04-13-.17(2)(a)4. The rule requires the petition to include a corporate organization chart showing all affiliate relationships. However, there are errors on the corporate organizational chart filed as Exhibit 5 to the Joint Petition. Specifically, (1) US Water, LLC should read as US Water Systems, LLC and (2) Central States Water Resources, Inc. should be shown as linked directly to CSWR, LLC and not linked to US Water, LLC. Josiah Cox provided such corrections in his testimony in a hearing before the Kentucky Public Service Commission.*

Response: Please find attached Revised Exhibit 5 to the Joint Application. Revised Exhibit 5 includes the corrected naming convention for US Water Systems, LLC. However, Central States Water Resources, Inc., should not be shown as linked directly to CSWR, LLC. Central States Water Resources, Inc., is owned by US Water Systems, LLC, but Central States Water Resources, Inc., does not have ownership interest in CSWR, LLC. Therefore, Central States Water Resources, Inc., is linked properly on Exhibit 5 and Revised Exhibit 5.

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Also, please find attached Revised Exhibit 12 that clarifies the description of Mr. Cox's role in CSWR, LLC, and Central States Water Resources, Inc.

2. *Rule 1220-04-13-.17(2)(a)5. The rule requires a copy of the applicant's articles of incorporation, partnership agreement, and/or by-laws. The required documents were filed with the Joint Petition; however, the Consumer Advocate noticed that the principal address for Limestone on both the Operating Agreement and the articles of incorporation are not the same principal address stated on page 4 of the Joint Petition. Please explain why they differ and clarify.*

Response: The address included in Limestone's Operating Agreement and Articles of Incorporation reflects the Company's previous office location. The principal address stated on page 4 of the Joint Petition is the Company's current office location.

3. *Rule 1220-04-13-.17(2)(a)7(i). This rule requires the location of the wastewater system, i.e., treatment plant, pre-application treatment facilities, collection infrastructure, building(s) for equipment, drip fields, disposal fields and/or wetland cells.*
 - *The Genesis Village map shows only the wastewater treatment facility ("WWTF") and lift station location without the required details. According to SOP-08040, the system is described as a system with septic tanks, an effluent collection system, two Aquapoint BioClere fixed film reactors, and fenced drip irrigation field. The Consumer Advocate reviewed the Tennessee Department of Environment and Conservation ("TDEC") Water Resources Dataviewer ("WR Dataviewer") and Enforcement Dataviewer. As a result of this review, the Consumer Advocate located a TDEC administrative order, which required Cumberland Basin Water Systems, Inc. ("CBWSI") to file updated engineering plans of the system.*
 - *The Bluffs map only shows the WWFT location. According to SOP-07008, the system is described as a system with septic tanks, an effluent collection system, a recirculating media filter, a UV disinfection, and a 6.0-acre drip irrigation field. The Consumer Advocate reviewed TDEC WR and Enforcement Dataviewers, but we did not locate engineering plans or administrative orders regarding this system in the dataviewers.*

Please file updated maps in this docket that clearly provide the required detail as set out in this rule.

Response: Please find attached Revised Collective Exhibits 1A and 1B to the Joint Application. Revised Collective Exhibit 1A includes an updated map, as well as a schematic extracted from the Engineering Report for Genesis Village. Revised Collective Exhibit 1B includes an updated map, as well as engineering drawings for The Bluffs. Read together for each subdivision, these documents provide the necessary details and address the requirements outlined above.

4. Rule 1220-04-13-.17(2)(a)7(iii). This rule requires a map to show access roads and names of access roads and the other utilities necessary to provide wastewater service. The updated engineering plans for SOP-08040 appear to delineate an access road to the WWTF. The maps provided in the Joint Petition do not show access roads or other utilities necessary to provide services. Please file updated maps in this docket that shows the access roads and other utilities pursuant to this rule requirement.

Response: Please see the Company's response to #3 above.

Rule 1220-04-13-.17(2)(c) Managerial Ability

1. Rule 1220-04-13-.17(2)(c)3. This rule requires copies of all contracts related to any pending merger or acquisition of the applicant, corporate parent or affiliate. All TPUC docket numbers were provided in response to this rule with a statement of this rule being overly burdensome to Limestone. Recently, the Commission issued an order that granted Limestone's motion for waiver of this rule. The Consumer Advocate did not locate a motion for waiver of this rule for the current Docket. Please clarify if a waiver of this rule has been obtained.

Response: Limestone did not request a waiver from Rule 1220-04-13-.17(2)(c)(3) in this docket. In previous dockets, specifically Docket Nos. 23-00016¹ and 23-00036², no waivers were requested. The Commission accepted the Company's arguments and position with respect to Rule 1220-04-13-.17(2)(c)(3), as well as approved the Petitions. Therefore, the Company is seeking the same treatment in this docket. However, if the Commission prefers that the Company file a motion, it will do so.

Rule 1220-04-13-.17(2)(d) Technical Ability

1. Rule 1220-04-13-.17(2)(d)2. This rule requires a copy of the State Operator Certificate for the wastewater system operator of record. If the operator is a contract employee of the utility, provide a copy of the employment contract. The certificate filed with the Joint Petition reflects the current operator is the current Cumberland Basin employee. Limestone stated that they will not retain any of the current Cumberland Basin employees.

¹ Expedited Joint Application of Limestone Water Utility Operating Company, LLC, and DSH & Associates, LLC, for Approval of the Acquisition of and to Operate the Wastewater System of DSH & Associates, LLC, and to Transfer or Issue a Certificate of Public Convenience and Necessity, Appendix A, p. 3, TPUC Docket No. 23-00016 (Mar. 1, 2023); see also Order Approving Settlement Agreement and Transfer of System, and Granting Certificate of Convenience and Necessity, TPUC Docket No. 23-00016 (Dec. 26, 2023).

² Limestone Water Utility Operating Company, LLC's Application to Expand its Certificate of Convenience and Necessity to Serve the Nash Ridge Subdivision, Appendix A, p. 14, TPUC Docket No. 23-00036 (May 22, 2023); see also Order Amending Certificate of Public Convenience and Necessity, TPUC Docket No. 23-00036 (Jan. 26, 2024) (approving Limestone's application).

Please update this docket by filing Limestone's operator certificate or the contract with the operator who will be Limestone's contract employee.

Response: If the Commission grants Limestone the authority to acquire the system currently owned by Cumberland Basin, after transfer of the system, Limestone will issue a Request for Proposal ("RFP") to identify the best and most cost-effective entity to operate this system. Responses to this RFP will only be accepted from licensed, professional operators. Only then can the actual operator be identified. Once the operator has been identified, Limestone will file the State Operator Certificate with the Commission.

2. *Rule 1220-04-13-.17(2)(d)4. This rule asks for a list of complaint(s), notices of violation or administrative action filed with or issued by a regulatory agency and to identify the nature of the complaint notices of violation or administrative action, which agency is involved, and how the issue was or is being resolved. In reviewing the Joint Petition and the TDEC Water Resources Dataviewer, the Consumer Advocate notes the following regarding Limestone's existing wastewater and water utilities:*
 - a. *Grasslands Wastewater System, TN0027278.*
 - i. *Consent Order. The Joint Petition states that Limestone entered into a Consent Order with TDEC on February 3, 2023, resolving issues at Grasslands sewage treatment plant. Please update this docket with an explanation detailing the status of the corrective action set out in the consent decree.*
 - ii. *Ongoing Issues. The Grasslands System has had 4 incidents of washouts; a sanitary sewer overflow at a manhole; a failure of lift station resulting in the release of 250,000 gallons of untreated wastewater; and the overflow from a sludge holding tank. In response to inquiries by TPUC Staff and the Consumer Advocate in TPUC Docket No. 23-00026, TDEC provided an overview of the conditions and issues of concern of adding additional waste load to the Grasslands System.*
 - b. *Aqua Drinking Water System, DWS ID#0000948. TDEC recently issued a Notice of Deficiency regarding Limestone's failure to provide documentation of participant notice activities as required under TDEC's rules and regulations. A copy of the Notice of Deficiency is attached as CA MFR Exhibit A-9. Please provide an explanation and update to this Notice of Deficiency.*
 - c. *Hideaway Wastewater System, SOP-07090. By letter dated July 10, 2023, TDEC issued a Compliance Evaluation Inspection and Notice of Violation detailing numerous issues of concern and 7 "Action Items and Recommendations." A copy of the Notice of Violation is attached as CA MFR Exhibit A-10. Limestone responded, in writing, to the Notice of Violation on 3 different dates: August 9th, September 12th, and November 7th. In 2012, TDEC conducted a site visit at this*

system and filed a Filed Activity Report dated May 8, 2012. Please provide an explanation and update regarding any outstanding issues of concern raised by TDEC.

Response:

a. Grasslands Wastewater System

- i. Grasslands Consent Order. On February 13, 2023, Limestone entered into a Consent Order & Assessment with TDEC to address issues at the Grasslands facility. Limestone has been working with Mr. Michael Lancaster, in TDEC's Division of Water Resources Enforcement Unit, to implement the terms of the Consent Order. Consistent with this, Limestone submitted to TDEC the attached Schedule for Construction, which was approved by TDEC in the accompanying email (collectively, Attachment A). The Schedule for Construction outlines the timeline for Limestone to complete an upgrade to the Grasslands facility.

Prior to this upgrade, Limestone is also implementing repair measures to increase the facility's existing capacity, including working on the replacement of a failed influent screen, inflow and infiltration ("I & I") investigations, and a sewer main/manhole lining project to reduce flow coming to the plant. These projects are expected to be completed within the next year and will improve the facility's ability to treat the wastewater feeding into it. The amount of trash and nuisance solids are hindering the plant's ability to treat to its full potential and Limestone believes that these projects will free up previously underutilized or wasted treatment capacity to treat waste from new connections from the Nash Ridge Subdivision. Limestone believes that these measures will make existing capacity available to serve the new customers of the Nash Ridge Subdivision prior to the system upgrade.

- ii. Grasslands Ongoing Issues. Limestone's NPDES permit for the Grasslands facility (TN0027278) requires that Limestone report washouts, sanitary sewer overflows, and upsets to TDEC; therefore, as noted by the Consumer Advocate, Limestone reported each incident to TDEC in compliance with these permit requirements. No Notices of Violation have been issued by TDEC in relation to these incidents. As noted above, Limestone is implementing repair measures to increase the facility's existing capacity, including working on the replacement of a failed influent screen, I & I investigations, and a sewer main/manhole lining project that Limestone believes will help minimize future incidents.
- b. Aqua Drinking Water System. On November 30, 2023, TDEC issued Limestone correspondence regarding the failure to provide documentation of participant notice activities for Lead & Copper Monitoring. On January 4, 2024, Limestone completed and submitted the notice documentation to TDEC and received confirmation from

TDEC that the notice requirements for Lead & Copper Monitoring had been satisfied. Please see Attachment B for this documentation.

- c. Hideaway Wastewater System. On July 10, 2023, Limestone was issued a Notice of Violation detailing issues of concern and 7 “Action Items and Recommendations.” All the Action Items and Recommendations from the July 10, 2023 evaluation have been addressed and satisfied, and documentation submitted to TDEC. The Field Activity Report dated May 8, 2012, appears to be related to Sunset Cove Condominiums and not Hideaway Wastewater System. Additionally, in 2012, the Hideaway Wastewater System was under previous ownership and was not acquired by Limestone until December 21, 2021.

Rule 1220-04-13-.17(e) Sworn Testimony

1. Rule 1220-04-13-.17(2)(f)(6). *This rule requires a signed affidavit stating that all information submitted concerning the wastewater CCN application is true and correct to the best of the witness’ knowledge and belief. The Direct Testimony of Josiah Cox filed with the Joint Petition contains an affidavit, but it fails to satisfy the rule here. Please file a correct affidavit in this docket to comply with this rule.*

Response: Please see attached Supplemental Exhibit 9, a signed affidavit concerning the Joint Application.

ATTACHMENT B – Acquisition MFRs

Rule 1220-04-14-.08(2) Acquisitions

1. Rule 1220-04-14-.08(2)(b). *The Joint Petition stated in “Appendix A” that only CSWR/Limestone’s financials were provided. The rule requires the financial statements “of the selling utility’s three most recently completed fiscal years or reporting periods at the time the application for acquisition is filed.” Please update the Docket and provide Cumberland Basin’s financial statements.*

Response: Please find attached as Supplemental Exhibit 20 Cumberland Basin's 2022 Annual Report, 2021 Annual Report, and 2020 Annual Report.

Sincerely,

BUTLER SNOW LLP



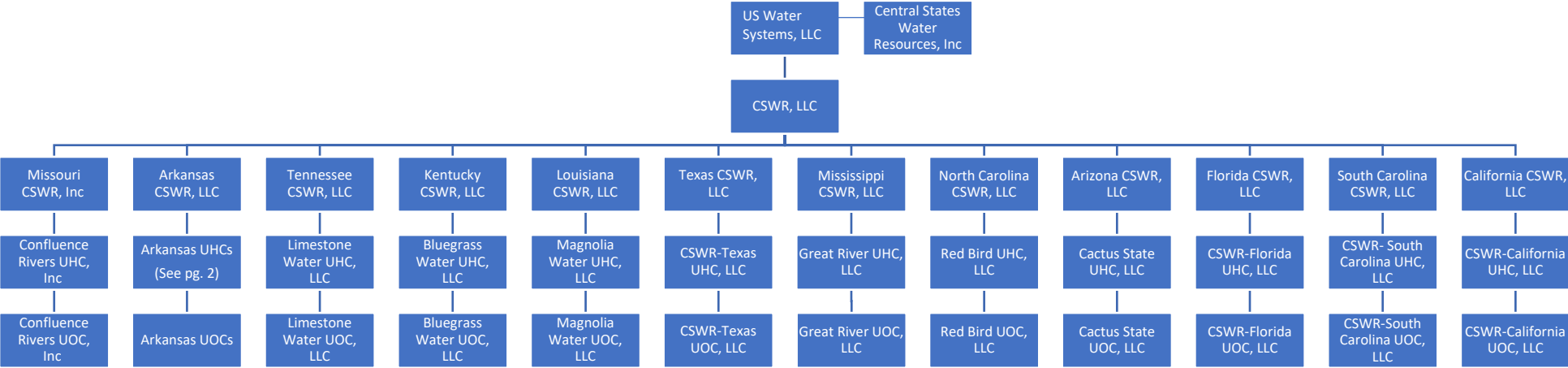
Katherine Barnes

Attachments

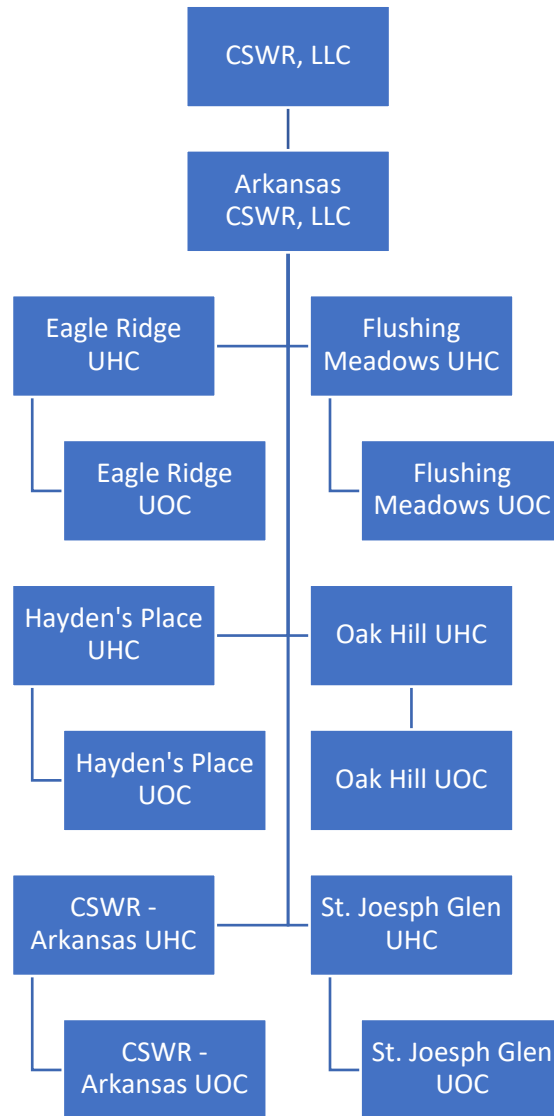
cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Tim Huddleston, Cumberland Basin Wastewater Systems, LLC
David Woodsmall, Central States Water Resources
Shilina Brown, Consumer Advocate Division

REVISED EXHIBIT 5

Central States Water Resources Corporate Entity Organizational Chart



Arkansas CSWR Organizational Chart Detail



REVISED EXHIBIT 12

Josiah Cox – President

Mr. Cox is President of Limestone Water Utility Operating Company, LLC, Limestone Water Utility Holding Company, LLC, and also of, CSWR, LLC, (“CSWR”) and Central States Water Resources, Inc. All those companies are part of an affiliated group that provides water and/or wastewater utility services to approximately 150,000 customers in 11 states.

Mr. Cox received a Bachelor of Science degree with a major in Environmental Science from the University of Kansas where he was also a student-athlete. Professionally he has worked at the Kansas state biological survey, where he performed a wildlife habitat study. He then worked at a civil engineering firm where he was involved in various facets of the land development process including permitting, entitlement, civil design, project management, and construction management. He focused mainly on the water and wastewater side of the civil engineering business and participated in every aspect of that business from waste-load allocation studies (now known as the anti-degradation processes), to design, permitting, project management, and construction management. He also ran the firm's environmental consulting division and was the second private consultant to submit a Water Quality Impact Assessment in the state of Missouri in 2003. He later joined the engineering firm's executive leadership team and helped run all the firm's operations.

Beginning in 2005, he formed a full-service civil engineering, environmental consulting, general contracting, and construction management firm. He gained extensive experience with rural communities in every facet of the water and wastewater compliance process; including environmental assessment, permitting, design, construction, operation and community administration of the actual water and wastewater (sewerage) systems. The firm performed stream sampling and built waste-load allocation models to determine receiving water-body protective permit-able effluent pollutant loads. They did full engineering design of multiple whole community water and wastewater infrastructure systems including wells, water distribution, water treatment, water storage, wastewater conveyance, and wastewater treatment plants and delivered these designs through federal and state administered permitting processes in Missouri. The engineering firm also administered the construction of these water and wastewater systems from green field site selection all the way through system startup and final engineering sign-off. During this time, Mr. Cox also began the Master of Business Administration (MBA) program at Washington University in St. Louis, from which he earned his advanced degree and graduated in 2007.

Additionally, beginning in 2008, Mr. Cox took over the operations of a rural sewer district where he managed the functioning, testing, and maintenance of this system. In that capacity, he also acted as the administrator for the system, performing all the billing, emergency response, accounts payable/accounts receivable, collections, budgeting, customer service, and public town meetings required to service the community. He no longer has any responsibilities for that system.

In late 2010, after working on several small, distressed water and wastewater systems, Mr. Cox created a business plan to acquire and recapitalize failing systems as investor-owned, regulated water and wastewater utility companies. In early 2011, he went to the capital markets to raise money to implement his plan, and over a period of approximately three years met with more than fifty- two infrastructure investment groups in an attempt to raise necessary financing. In February 2014, he was able to raise sufficient debt and equity capital to start CSWR. In 2018, he attracted an additional large institutional private equity investor, which allowed CSWR to expand the scope of its business plan. Since its formation, CSWR has acquired, and is currently operating more than 800 water and/or wastewater systems in Arizona, Arkansas, Florida, Kentucky, Louisiana, Missouri, Mississippi, North Carolina, South Carolina, Tennessee, and Texas.

Marty Moore – Chief Financial Officer

Marty Moore is the Chief Financial Officer of CSWR, LLC, and has held this position since April 2020. As CFO, Mr. Moore provides leadership, direction, and oversight of the finance and accounting teams, managing the process for financial forecasting, budgeting, and reporting in addition to overseeing the human resources and risk management functions.

After receiving a Bachelor of Business Administration in Accounting from Abilene Christian University, Mr. Moore gained a wide range of financial management experience. Moore's extensive senior-level finance and operational expertise includes serving as CFO of international automation equipment manufacturer Baldwin Technology Co., a company he helped Barry-Wehmiller/Forsyth Capital take private in 2012. Prior to that, Mr. Moore held senior leadership positions with Summit Marketing, Consolidated Terminals, Barnhill's Buffet Inc., and Global Materials Services. He began his career at Arthur Andersen. Moore most recently led finance and corporate services as CFO of Gardner Capital, a national affordable housing and renewable energy developer, investor, and tax credit syndicator. He has an extensive background in mergers and acquisitions and works alongside Mr. Cox in accelerating the company's already rapid growth trajectory.

Todd Thomas – Vice President

Todd Thomas holds the office of Senior Vice President of CSWR. Mr. Thomas received his Bachelor of Science in Civil Engineering from The Missouri University of Science and Technology, and a Master of Business Administration from Washington University in St. Louis.

Before joining CSWR, Mr. Thomas was President of Brotcke Well and Pump, Vice President of Operations and Business Development of the Midwest for American Water Contract Operations, and General Manager of Midwest Operations for Environmental Management Corporation. Mr. Thomas currently serves on the Technical Advisory Team for the Public Water Supply District 2 of St. Charles County, MO.

Mr. Thomas's past positions in related industries has provided him with extensive experience in water and sewer utilities. He has in depth, firsthand knowledge about the amount of damage resulting from the lack of maintenance on a well system, and he understands how much money and effort are required to restore a well system after neglect.

In his position as Senior Vice President at CSWR, Mr. Thomas's primary responsibilities include utility operations along with the acquisition, development, and rate stabilization of CSWR- affiliated utilities. Those duties include operations, maintenance, capital planning, and regulatory compliance for all affiliate-owned facilities. He is responsible for the management of all operations and maintenance service providers, and engineering firms.

Mike Duncan –Vice President

Mike Duncan is the Vice President of CSWR and was promoted to that position in October 2020. As Vice President, he has played an integral role in researching, preparing, filing, and processing acquisition applications in Missouri, Kentucky, Tennessee, Louisiana, Texas, North Carolina, and Mississippi. He also has taken a leading role in preparing and filing rate cases in Missouri, Kentucky, and Louisiana.

After receiving his Bachelor of Arts degree from Washington University in St. Louis, the first eleven years of his career were spent as an administrator and later director at a non-profit organization in St. Louis, Missouri. As Executive Director, Mr. Duncan oversaw accounting, finance, human resources, IT, and communications for the organization. During his employment he earned his Master of Business Administration from the Olin School of Business at Washington University. Prior to joining CSWR, he spent two years as Director of Operations with NAPA Auto Tire & Parts, a partner-owned chain of auto parts stores, overseeing projects related to distribution, logistics, IT, and general management.

Jake Freeman – Director of Engineering

Jake Freeman is the Director of Engineering of CSWR and has held this position since January 2019. As Director of Engineering, he oversees the engineering, surveying, and facility construction upgrades for all newly acquired CSWR water and wastewater utilities including those in Arizona, Arkansas, Florida, Kentucky, Louisiana, Missouri, Mississippi, North Carolina, South Carolina, Tennessee, and Texas. He also oversees ongoing capital upgrade projects on all CSWR affiliated and operated facilities.

After receiving a Bachelor of Science degree in Mechanical Engineering from the University of Missouri – Columbia, Mr. Freeman spent the first two years of his career working for Corrigan Mechanical, a design-build mechanical contractor in St. Louis, where he designed, estimated, and managed plumbing, HVAC and process piping construction projects in Missouri and southern Illinois. He then spent eleven years performing similar tasks for Brotcke Well & Pump, a well and pump service contractor servicing water wells and water treatment equipment throughout Missouri, Illinois, Kentucky, and Kansas. Prior to his employment with CSWR, he held the position of Vice President of Brotcke Well & Pump and Principal for their engineering services and managed their newly opened office in Kansas City.

Jo Anna McMahon - Vice President of Government Affairs

Jo Anna McMahon is the Vice President of Government Affairs for CSWR. Ms. McMahon holds several top water and wastewater certifications throughout the country. She received her Bachelor of Business Administration degree from the University of Arkansas at Little Rock, and will be graduating in May 2023 with a Master of Business Administration degree from Washington University in St. Louis, Missouri.

Before joining CSWR, Ms. McMahon worked for both public and private utilities, respectively serving at both municipality and military installations. Ms. McMahon has extensive experience as both an Operations Coordinator and as a Specification Specialist.

In her previous position as Director for Environmental Health and Safety at CSWR, her responsibilities included managing daily operations of wastewater and water treatment facilities of various sizes ranging from 3,600 gallons per day (gpd) to 64,000,000 gpd. Throughout that time, Ms. McMahon led teams of operators in creating and executing infrastructure improvement plans, managing and developing employees, and providing a standard of excellence in customer service while keeping facilities and operations within regulatory compliance.

Ms. McMahon's previous employment equipped her with invaluable experience in water and sewer utilities. She has a wide range of firsthand experience in managing water and wastewater treatment facilities safely and in a financially and operationally sound manner.

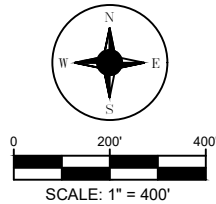
Chelsie Carter - Director of Customer Experience

Chelsie Carter is the Director of Customer Experience at CSWR. Ms. Carter joined CSWR in 2021 as Customer Experience Manager and was promoted to Director level within seven months, leading an overhaul of the CSWR's customer service functions during a period of dramatic growth.

Ms. Carter first earned a Bachelor of Science degree followed by her Master of Business Administration from Lindenwood University. She has a strong background in training and management as well as extensive experience with utility providers. Prior to joining CSWR, she led the Accounts Receivable division at the St. Louis Metropolitan Sewer District, where she also served as the point of contact for dozens of major accounts. Areas of oversight included billing \$34M per month in customer invoices, customer service for 430k customers, processing an average of \$1M in payment remittance per day and collecting more than \$92M in delinquent accounts. Ms. Carter also spent 16 years with American Water, starting as the supervisor for the Customer Call Center and working her way up to Business Services Specialist. In this role she was the point of contact for the Public Service Commission on customer-related issues and resolutions. She has provided direction and support for several rate cases, acquisitions, and software implementations.

Since joining CSWR, Ms. Carter continues to oversee the entire customer life cycle, focusing on improving the customer experience in the areas of self-service, software systems and processes.

REVISED COLLECTIVE EXHIBITS 1A AND 1B



PROPOSED SERVICE AREA MAP CUMBERLAND BASIN – GENESIS VILLAGE ESTATES, TN CUMBERLAND, TN

General Location Map

ELECTRICAL UTILITY SERVICE FOR THIS PARCEL IS PROVIDED BY:
VOLUNTEER ENERGY COOPERATIVE
KEVIN HEMBREE, SERVICE AREA MANAGER
P.O. BOX 609
235 O'BRIEN DRIVE
CROSSVILLE, TN 38555

**SITE 1: WWTF, SEPTIC TANKS, EFFULENT
COLLECTION SYSTEM, 2 AQUAPOINT
BIOCLERE FIXED FILM REACTORS, AND
FIXED DRIP IRRIGATION FIELD**
NEAR ADDRESS: 332 GENESIS AVENUE
Latitude: 36.018374135585
Longitude: -84.9940621809927

SITE 2: LIFT STATION SITE
NEAR ADDRESS: 124 GENESIS AVENUE
Latitude: 36.017131
Longitude: 84.992264

SERVICE AREA LEGAL DESCRIPTION GENESIS VILLAGE CAMPBELL COUNTY, TN

A parcel of land being located in Cumberland County, Tennessee, and being particularly described as follows:

Beginning at the SE corner of the Townhouses of Genesis Village Estates, thence run along a curve to the left along the northern right-of-way of Genesis Road for 300.92 feet, said curve having a radius of 3308.80 feet, a chord bearing of South 19°30'09" West, and a chord distance of 300.81 feet; thence continuing along said right-of-way run South 16°53'53" West for 326.27 feet; thence leaving said right-of-way run North 38°16'59" West for 1820.72 feet; thence run North 31°56'18" East for 382.87 feet; thence run North 62°04'06" East for 136.29 feet; thence run South 39°17'56" East for 1579.38 feet back to the Point of Beginning.

Said parcel contains 20.1 acres, more or less.

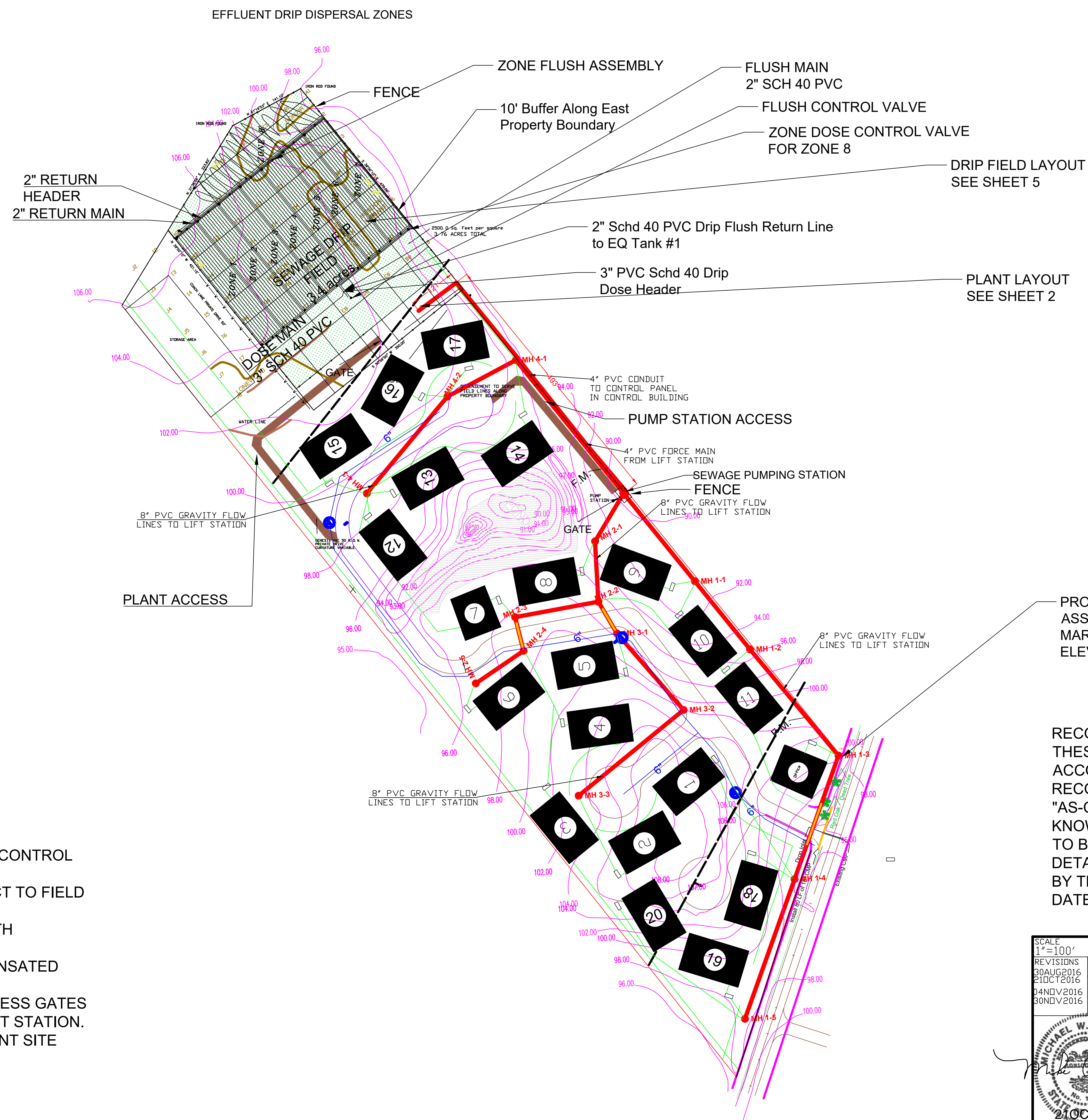
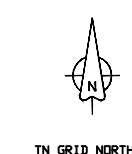
LEGEND

 Requested Area to Transfer

EXHIBIT 1
DATE: 01/09/24
DRAWN BY: A.M.D.
SCALE: 1" = 400'
SHEET NAME:
GENERAL LOCATION MAP

**21
DESIGN
GROUP INC.**


1351 Jefferson, Suite 301
Washington, MO 63090
mail@21designgroup.net
P: 636-432-5029

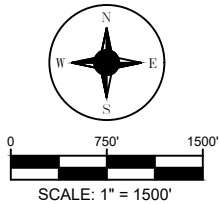


DRIP CONSTRUCTION NOTES:

1. SEE TYPICAL DRIP ZONE DETAIL SHEET 4 FOR CONTROL VALVE LOCATIONS WITHIN ZONES.
2. CAV VALVE LOCATIONS APPROXIMATE SUBJECT TO FIELD LOCATION.
3. DRIP LINES TO BE ON NOMINAL 5' SPACING WITH ORIFICES ON 1' SPACING.
4. DRIP TUBE TO BE NETAFIM PRESSURE COMPENSATED UNIRAM 0.820" ID, 0.61 GPH.
5. 5' CHAIN LINK OR BARB WIRE FENCE WITH ACCESS GATES AROUND DRIP AND TREATMENT UNITS AND LIFT STATION.
6. 8' WIDE GRAVEL ACCESS DRIVES TO TREATMENT SITE AND LIFT STATION.



SCALE 1"=100'		SEWAGE WORKS	
REVISIONS	DESIGNED	SITE LAYOUT	
30AUG2016	EWC		
21OCT2016	DRAWN		
04NOV2016	EWC		
30NOV2016	CHECKED	FOR GENESIS VILLAGE ESTATES CUMBERLAND COUNTY, TN	
	MWC		
			
CE DESIGNERS, Inc.		DATE	21 OCT 2016
100 EAST COMMERCIAL AVENUE MONTEREY, TENNESSEE 38574		JOB NO.	D-159
		SHEET 1	



PROPOSED SERVICE AREA MAP CUMBERLAND BASIN – THE BLUFFS AT CUMBERLAND COVE, TN PUTNAM, TN

General Location Map

SERVICE AREA LEGAL DESCRIPTION
THE BLUFFS AT CUMBERLAND COVE
PUTNAM COUNTY, TN

A parcel of land being located in the Fourth Civil District of Putnam County, Tennessee, and being particularly described as follows:

Beginning at the southernmost corner of Lot 49 of Cumberland Cove, Unit 8, Block 69, said point being on the northern right-of-way of Cliff Park Road & Eastridge Pass, thence run South 24° 05' 19" East for 70.00 feet; thence run South 72° 36' 15" West for 54.77 feet; thence run South 10° 42' 14" East for 7.98 feet; thence run South 79° 17' 46" West for 153.63 feet; thence run North 10° 42' 14" West for 7.98 feet; thence along a curve to the left for 164.17 feet, said curve having a radius of 195.00 feet, a chord bearing of S55° 10' 43" West, a chord distance of 159.36 feet; thence run South 31° 20' 37" West for 201.18 feet; thence run South 34° 28' 27" West for 328.95 feet; thence run South 19° 57' 37" West for 61.29 feet; thence run South 26° 30' 18" West for 87.80 feet; thence run South 19° 58' 55" West for 177.20 feet; thence run South 85° 21' 31.21" East for 12.15 feet; thence run South 02° 12' 55" East for 69.12 feet; thence run South 43° 26' 41" East for 122.57 feet; thence run North 76° 40' 48" East for 147.40 feet; thence run South 17° 50' 16" West for 123.23 feet; thence run South 06° 35' 18" West for 140.92 feet; thence run South 07° 59' 18" West for 159.02 feet; thence run South 10° 47' 18" West for 151.32 feet; thence run South 03° 54' 59" West for 154.47 feet; thence run South 33° 14' 10" West for 159.76 feet; thence run South 36° 39' 18" West for 187.82 feet; thence run South 46° 47' 22" West for 152.91 feet; thence run South 17° 49' 27" West for 175.19 feet; thence run South 04° 21' 47" East for 172.60 feet; thence run South 15° 22' 55" West for 196.37 feet; thence run South 23° 02' 18" East for 186.22 feet; thence run South 01° 04' 42" East for 252.23 feet; thence run South 21° 25' 42" East for 275.94 feet; thence run South 10° 45' 14" West for 256.65 feet; thence run South 58° 08' 13" East for 198.40 feet; thence run South 20° 14' 42" East for 229.83 feet; thence run South 15° 42' 42" East for 102.31 feet; thence run South 12° 53' 22" East for 304.51 feet; thence run South 26° 43' 40" East for 71.85 feet; thence run South 35° 19' 49" West for 105.09 feet; thence run South 35° 19' 49" West for 153.94 feet; thence run South 35° 22' 06" West for 154.82 feet; thence run South 30° 20' 30" East for 119.28 feet; thence run South 00° 29' 30" West for 204.41 feet; thence run South 00° 37' 19" West for 94.69 feet; thence run South 03° 17' 46" West for 158.18 feet; thence run South 41° 46' 12" East for 156.36 feet; thence run South 26° 35' 02" West for 188.75 feet; thence run South 33° 39' 13" West for 330.29 feet; thence run South 15° 13' 31" East for 123.40 feet; thence run South 06° 33' 18" West for 300.93 feet; thence run South 27° 07' 18" West for 249.18 feet; thence run South 26° 35' 37" West for 390.31 feet; thence run South 21° 02' 54" West for 35.05 feet; thence run South 31° 39' 18" West for 58.57 feet; thence run South 08° 25' 46" West for 172.02 feet; thence run South 24° 14' 49" West for 196.18 feet; thence run South 45° 50' 35" West for 132.22 feet; thence run South 48° 26' 31" West for 49.09 feet; thence run South 15° 04' 21" West for 55.69 feet; thence run South 29° 57' 40" West for 99.90 feet; thence run South 21° 00' 00" East for 47.01 feet; thence run South 18° 17' 12" West for 154.75 feet; thence run North 58° 57' 25" West for 514.05 feet; thence run North 26° 45' 00" West for 553.80 feet; thence run North 35° 28' 23" West for 252.24 feet; thence run North 21° 30' 20" West for 149.73 feet; thence run North 41° 38' 02" West for 121.83 feet; thence run North 35° 43' 42" West for 187.52 feet; thence run North 78° 12' 30" West for 173.38 feet; thence run North 39° 27' 12" West for 361.94 feet; thence run North 18° 57' 17" East for 581.20 feet; thence run North 61° 06' 24" East for 721.92 feet; thence run North 72° 34' 51" East for 150.37 feet; thence run North 86° 17' 52" East for 224.26 feet; thence run South 04° 31' 08" East for 125.14 feet; thence run South 00° 51' 34" West for 67.69 feet; thence run South 47° 25' 03" East for 46.28 feet; thence run South 04° 12' 19" East for 59.78 feet; thence run South 13° 54' 37" West for 125.44 feet; thence run South 01° 52' 33" East for 184.41 feet to the northern right-of-way of Westridge Trail; thence run in a northeasterly direction along said right-of-way the following calls: run along a curve to the left for 105.71 feet, a radius of 175.00 feet, a chord bearing of N58° 27' 15" East, and a chord distance of 104.11 feet; thence run North 42° 26' 01" East for 84.57 feet; thence along a curve to the left for 116.40 feet, said curve having a radius of 175.00 feet, a chord bearing of N23° 22' 40" East, and a chord distance of 114.27 feet; thence run North 04° 19' 19" East for 103.74 feet; thence leaving said right-of-way, run South 87° 44' 23" West for 144.41 feet; thence run North 07° 22' 49" East for 203.54 feet; thence run North 51° 04' 19" East for 192.26 feet; thence run South 28° 41' 37" East for 141.25 feet to the northern right-of-way of Westridge Trail; thence run North 59° 16' 10" East along said right-of-way for 150.08 feet; thence leaving said right-of-way, run North 28° 41' 37" West for 135.81 feet; thence run South 61° 18' 23" West for 57.53 feet; thence run North 70° 43' 38" West for 40.02 feet; thence run North 50° 53' 10" West for 117.53 feet; thence run South 71° 34' 47" West for 100.76 feet; thence run North 14° 02' 05" West for 202.62 feet; thence run North 60° 59' 27" East for 162.16 feet; thence run North 31° 25' 05" East for 196.45 feet; thence run North 41° 54' 27" East for 62.64 feet; thence run North 63° 53' 35" East for 76.08 feet; thence run South 73° 47' 25" East for 85.38 feet; thence run South 87° 59' 36" East for 48.72 feet; thence run North 79° 10' 50" East for 77.20 feet; thence run North 05° 17' 34" West for 424.46 feet; thence run North 11° 53' 07" West for 497.25 feet; thence run North 04° 58' 22" West for 181.36 feet; thence run North 9° 13' 41" West for 255.34 feet to the southern right-of-way of Moss Bend Trail; thence run along said right-of-way the following calls: run South 89° 46' 03" West for 93.72 feet; thence run along a curve to the left for 332.70 feet, said curve having a radius of 195.00 feet, a chord bearing of S40° 52' 54" West, and a chord distance of 293.79 feet; thence run South 01° 21' 54" East for 154.34 feet; thence leaving said right-of-way, run South 51° 38' 47" East for 118.87 feet; thence run South 28° 00' 26" East for 324.59 feet; thence run South 59° 01' 39" West for 152.42 feet; thence run South 61° 50' 16" West for 201.92 feet; thence run South 67° 48' 05" West for 203.52 feet; thence run South 89° 58' 13" West for 316.60 feet; thence run North 70° 18' 19" West for 319.68 feet; thence run North 34° 26' 48" West for 313.60 feet; thence run North 07° 19' 41" West for 317.72 feet; thence run South 88° 49' 56" East for 379.92 feet to the western right-of-way of Moss Bend Trail; thence run along said right-of-way the following calls: run North 03° 37' 42" West for 132.19 feet; thence run along a curve to the left for 54.61 feet, said curve having a radius of 90.00 feet, a chord bearing of N21° 00' 49" West, and a chord distance of 53.78 feet; thence run along a curve to the right for 82.66 feet, said curve having a radius of 50.00 feet, a chord bearing of N08° 58' 22" East, and a chord distance of 73.56 feet; thence run North 03° 21' 52" West for 141.01 feet; thence run North 88° 16' 52" East for 521.51 feet; thence run South 43° 32' 57" East for 258.82 feet to the western right-of-way of Moss Bend Trail; thence run along said right-of-way on a curve to the right for 52.69 feet, said curve having a radius of 244.98 feet, a chord bearing of N31° 29' 11" East, and a chord distance of 52.59 feet; thence leaving said right-of-way run North 43° 17' 34" West for 203.62 feet; thence run North 03° 02' 35" East for 398.71 feet; thence run North 20° 51' 11" East for 111.33 feet; thence run South 83° 40' 41" East for 471.81 feet to the western right-of-way of Eastridge Pass; thence run in a northerly direction along said right-of-way the following calls: run along a curve to the right for 104.82 feet, said curve having a radius of 50.00 feet, a chord bearing of N11° 59' 04" West, and a chord distance of 86.65 feet; thence run along a curve to the right for 120.11 feet, said curve having a radius of 225.88 feet, a chord bearing of N01° 29' 02" East, and a chord distance of 118.70 feet; thence run North 16° 44' 17" East for 91.07 feet; thence run along a curve to the right for 125.81 feet, said curve having a radius of 226.89 feet, a chord bearing of N29° 59' 15" East, and a chord distance of 124.20 feet; thence run North 45° 52' 18" East for 53.53 feet; thence run along a curve to the left for 62.76 feet, said curve having a radius of 174.99 feet, a chord bearing of N35° 35' 55" East, and a chord distance of 62.42 feet; thence run North 25° 19' 32" East for 183.54 feet; thence leaving said right-of-way run South 87° 15' 51" West for 400.63 feet; thence run North 20° 51' 11" East for 1,651.59 feet; thence run South 57° 23' 06" East for 288.18 feet to the western right-of-way of Eastridge Pass; thence run North 43° 12' 54" East along said right-of-way for 81.22 feet; thence leaving said right-of-way run North 50° 12' 10" West for 473.67 feet; thence run North 04° 11' 21" West for 126.94 feet; thence run North 40° 20' 02" West for 135.93 feet; thence run North 51° 54' 05" West for 211.34 feet; thence run North 49° 38' 33" West for 196.03 feet; thence run North 52° 31' 33" West for 141.82 feet; thence run North 76° 40' 28" West for 215.25 feet; thence run South 86° 37' 47" West for 159.39 feet; thence run North 47° 02' 00" West for 81.01 feet; thence run South 75° 42' 08" West for 215.52 feet; thence run South 50° 29' 34" West for 93.77 feet; thence run South 15° 40' 16" West for 122.17 feet; thence run South 42° 54' 37" West for 44.18 feet; thence run North 40° 34' 31" West for 71.73 feet; thence run South 38° 31' 36" West for 122.38 feet; thence run South 12° 18' 27" West for 95.91 feet; thence run South 30° 25' 22" East for 89.83 feet; thence run South 55° 56' 12" West for 100.84 feet; thence run South 45° 31' 33" West for 209.91 feet; thence run South 18° 33' 27" West for 86.21 feet; thence run South 46° 34' 27" West for 97.41 feet; thence run South 65° 05' 27" West for 87.41 feet; thence run South 77° 41' 50" West for 63.12 feet; thence run North 87° 53' 35" West for 118.30 feet; thence run North 72° 34' 23" West for 181.96 feet; thence run North 08° 41' 51" West for 388.17 feet; thence run North 78° 03' 46" East for 73.75 feet; thence run North 04° 11' 37" East for 88.44 feet; thence run North 86° 36' 41" West for 28.60 feet; thence run North 03° 23' 55" West for 156.90 feet; thence run North 09° 19' 27" East for 124.62 feet; thence run North 10° 22' 33" West for 76.71 feet; thence run North 02° 23' 11" East for 171.89 feet; thence run North 43° 00' 00" East for 58.01 feet; thence run South 80° 57' 12" East for 298.36 feet; thence run North 73° 50' 24" East for 189.52 feet; thence run South 63° 27' 07" East for 107.26 feet; thence run North 85° 36' 45" East for 115.08 feet; thence run South 10° 19' 43" East for 162.47 feet; thence run South 87° 37' 49" East for 71.63 feet; thence run North 68° 09' 54" East for 212.82 feet; thence run North 55° 28' 15" East for 56.45 feet; thence run South 85° 48' 02" East for 115.19 feet; thence run North 72° 57' 17" East for 169.96 feet; thence run North 30° 46' 49" East for 131.51 feet; thence run North 12° 11' 28" West for 70.21 feet; thence run North 18° 20' 39" East for 131.91 feet; thence run North 56° 41' 53" East for 131.61 feet; thence run North 73° 54' 28" East for 115.94 feet; thence run South 64° 24' 20" East for 73.40 feet; thence run South 33° 56' 29" East for 205.80 feet; thence run South 23° 58' 31" East for 53.67 feet; thence run South 03° 02' 00" West for 120.94 feet; thence run South 17° 52' 44" West for 68.31 feet; thence run South 27° 32' 40" East for 145.37 feet; thence run South 03° 59' 57" East for 125.76 feet; thence run South 22° 52' 04" East for 115.55 feet; thence run North 50° 29' 34" East for 498.98 feet; thence run South 43° 09' 31" East for 709.34 feet; thence run South 02° 32' 58" East for 153.30 feet to the northern right-of-way of Eastridge Pass; thence run in an easterly direction along said right-of-way the following calls: run along a curve to the right for 77.41 feet, said curve having a radius of 255.05 feet, a chord bearing of N70° 36' 36" East, and a chord distance of 77.11 feet; thence run North 10° 40' 37" West for 7.98 feet; thence run North 79° 19' 23" East for 144.64 feet; thence run South 10° 40' 37" East for 7.98 feet; thence run North 72° 36' 15" East for 38.46 feet back to the Point of Beginning.

Said parcel contains 215.9 acres, more or less.

ELECTRICAL UTILITY SERVICE FOR THIS PARCEL IS PROVIDED BY:
VOLUNTEER ENERGY COOPERATIVE
KEVIN HEMBREE, SERVICE AREA MANAGER
P.O. BOX 609
235 O'BRIEN DRIVE
CROSSVILLE, TN 38555

**SITE 1: WWTF, SEPTIC TANKS, EFFULENT
COLLECTION SYSTEM, RECIRCULATING
MEDIA FILTER, UV DISENFECTION AND
6.0-ACRE DRIP IRRIGATION FIELD**
NEAR ADDRESS: 980 EASTRIDGE PASS
Latitude: 36.0576762560639
Longitude: -85.3025396396787

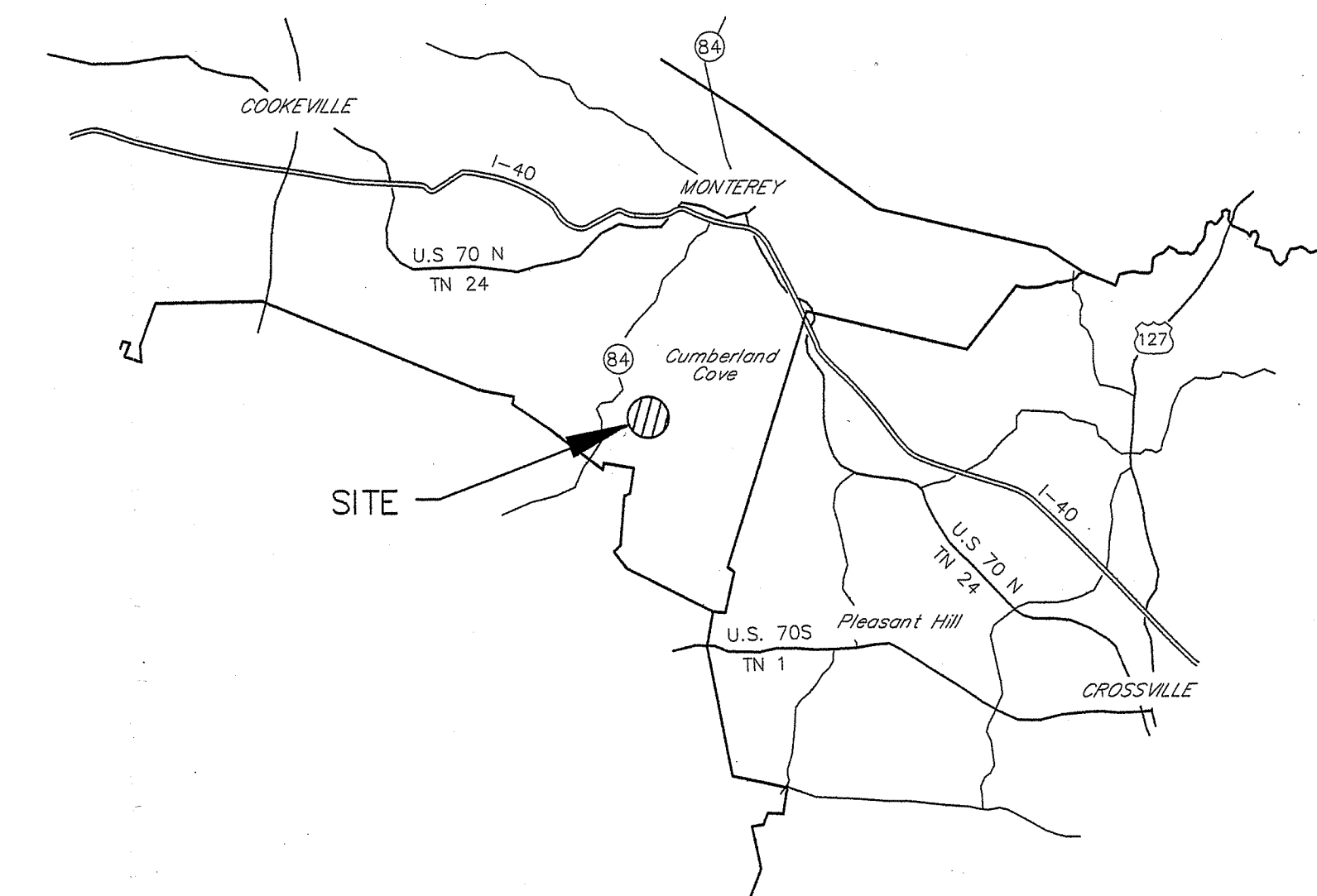
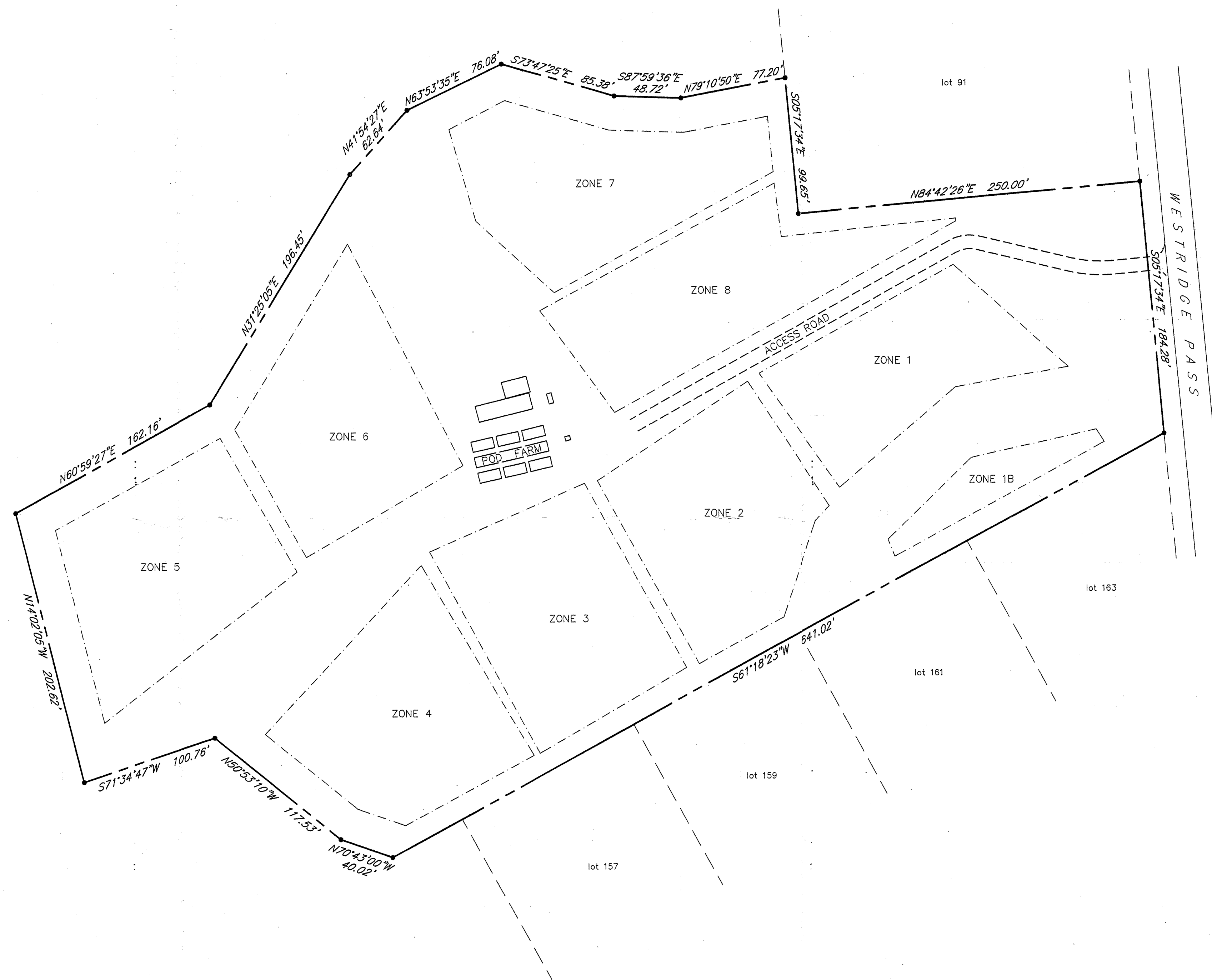
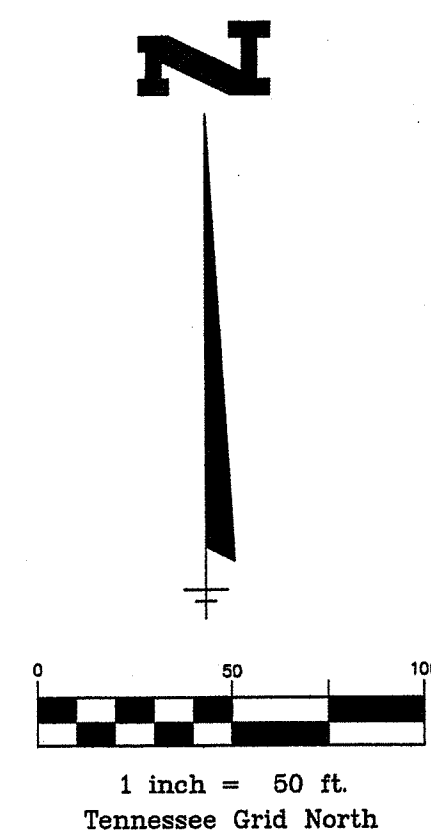
LEGEND



EXHIBIT 1	
DATE:	01/09/24
DRAWN BY:	A.M.D.
SCALE:	1" = 1500'
SHEET NAME:	
GENERAL LOCATION MAP	



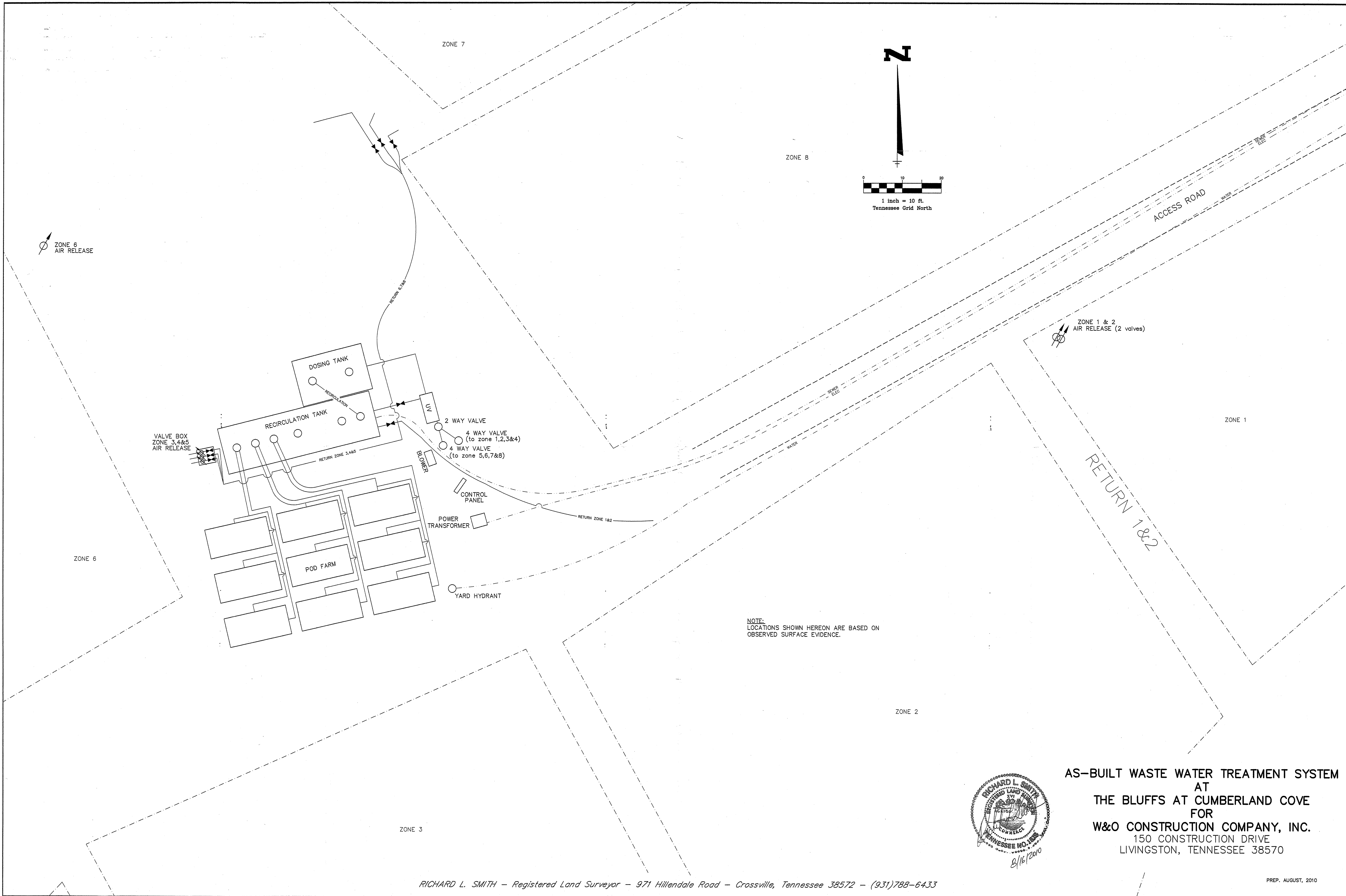
1351 Jefferson, Suite 301
Washington, MO 63090
mail@21designgroup.net
P: 636-432-5029



VICINITY MAP
PUTNAM-CUMBERLAND COUNTY,
TENNESSEE



AS-BUILT WASTE WATER TREATMENT SYSTEM
AT
THE BLUFFS AT CUMBERLAND COVE
FOR
W&O CONSTRUCTION COMPANY, INC.
150 CONSTRUCTION DRIVE
LIVINGSTON, TENNESSEE 38570



AS-BUILT WASTE WATER TREATMENT SYSTEM
AT
THE BLUFFS AT CUMBERLAND COVE
FOR
W&O CONSTRUCTION COMPANY, INC.
150 CONSTRUCTION DRIVE
LIVINGSTON, TENNESSEE 38570

ATTACHMENT A

**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

IN THE MATTER OF:)	DIVISION OF WATER RESOURCES
)	
)	
LIMESTONE WATER UTILITY)	
OPERATING COMPANY, LLC,)	
)	
)	
RESPONDENT.)	CASE NO. WPC22-0086

CONSENT ORDER AND ASSESSMENT

This Consent Order and Assessment is entered into between the Department of Environment and Conservation (“Department”) and Limestone Water Utility Operating Company, LLC (“Respondent”), for the purpose of resolving the issues set forth herein. The parties stipulate and agree as follows:

PARTIES

I.

The Commissioner is responsible for administering and enforcing the Water Quality Control Act, Tenn. Code Ann. §§ 69-3-101 to -148 (“Act”). The Commissioner may delegate to the Director any of the powers, duties, and responsibilities of the Commissioner under the Act, Tenn. Code Ann. § 69-3-107(13), and has delegated such authorities to Jennifer Dodd.

II.

The Respondent owns and operates the Grasslands sewage treatment plant (“Plant”) and the associated collection system in Williamson County, Tennessee. The Respondent is duly registered with the Secretary of State to conduct business in Tennessee. Process may be served on the Respondent through its Registered Agent, C T Corporation System, 300 Montvue Rd, Knoxville, Tennessee 37919.

JURISDICTION

III.

Whenever the Commissioner has reason to believe that a violation of the Act has occurred, is occurring, or is about to occur, the Commissioner may issue a complaint to the violator and the Commissioner may order corrective action be taken. Tenn. Code Ann. § 69-3-109(a). Further, the Commissioner has authority to assess civil penalties against any violator of the Act, Tenn. Code Ann. § 69-3-115, and has authority to assess damages incurred by the State resulting from the violation, Tenn. Code Ann. § 69-3-116. The Board of Water Quality, Oil and Gas (“Board”) has promulgated rules governing general water quality criteria and use classifications for surface waters. Tenn. Comp. R. & Regs. Chapters 0400-40-03 and 0400-40-04.

IV.

The Respondent is a “person” under the Act. Tenn. Code Ann. § 69-3-103.

V.

Harpeth River and its tributaries constitute “waters” of the state and “streams.” Tenn. Code Ann. §§ 69-3-103 (41) and (45). Harpeth River has been classified by the Board for the following uses: domestic water supply, industrial water supply, fish and aquatic life, recreation, irrigation, and livestock watering and wildlife. Harpeth River in Williamson County, Tennessee is included on the 2020 303(d) list of impaired streams due to elevated levels of total phosphorus and low concentrations of dissolved oxygen.

VI.

Any person engaged in or planning to engage in the discharge of sewage, industrial wastes, or other wastes into waters, or to a location from which it is likely that the discharged substance will move into waters, must obtain and comply with a permit from the Department. Tenn. Code

Ann. § 69-3-108. Each permit requires a set of effluent limitations to indicate adequate operation or performance of treatment units used and to appropriately limit those harmful parameters present in the wastewater. Tenn. Comp. R. & Regs. 0400-40-05-.08. The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the conditions of the permit. Tenn. Comp. R. & Regs. 0400-40-05-.07. It is unlawful for any person to violate the conditions of a discharge permit issued by the Department. Tenn. Code Ann. §§ 69-3-108(b) and -114(b).

FACTS

VII.

On August 30, 2021, the Division issued National Pollutant Discharge Elimination System (NPDES) permit TN0027278 (“Permit”) to Cartwright Creek, LLC. The Permit became effective December 1, 2021, and expires November 30, 2026. A minor modification transferred the Permit to the Respondent on January 1, 2022. The Permit authorizes the discharge of treated domestic wastewater from Outfall 001 to Harpeth River at mile 68.8 in accordance with all effluent limitations and monitoring requirements set forth.

VIII.

On May 17, 2022, Division staff conducted a Compliance Evaluation Inspection (CEI) of the Plant. Staff noted discrepancies in the operational monitoring data submitted for February, March, and April, 2022, and determined that information was not transferred accurately from laboratory bench sheets to Monthly Operation Reports (MORs) to Discharge Monitoring Reports (DMRs). Staff noted several other instances of reporting, transcription, and calculation errors, and that a Standard Operating Procedure (SOP) was not available on site for review.

During inspection of the treatment processes, staff noted significant corrosion of the above ground units, such that the structural integrity of the treatment unit walls and equipment was questionable. During an interview with Division staff, the operator stated that an inflow and infiltration (“I/I”) project completed in 2019 and 2020 had improved I/I issues during the summer months, but not during winter months when rainfall was heaviest.

Staff observed that no influent screening mechanism existed. Inorganic material was removed by hand and disposed of in a dumpster, which was periodically hauled off site, and an “island” of inorganic solids remained in the aeration basin. Staff observed that the interior walls surrounding the digester unit were rusted to the point where the unit was inoperable; digester function had been replaced by a polyethylene tank which held solids until they were trucked from the Plant. Staff noted that the clarifier was in poor condition: algae had accumulated on the weirs; no skimmer arm was present; grit, grease, pin floc, and debris floated on the clarifier surface.

Staff observed that chlorination and dechlorination processes were conducted in what was previously the above ground, “tertiary filtration” unit of the Plant. Staff observed grit and grease floating in the basin. In the interview, the operator stated that the internal components of this unit were removed years ago. Staff noted that the operator used chlorine gas for disinfection of effluent, manually adjusting chlorine dosing based on flow and the results of chlorine residual testing. The operator achieved dechlorination by similar manual dosing adjustments of sulfur dioxide gas.

During review of the laboratory and lab processes, staff observed that the temperature of the *E. coli* incubator was not within the correct range. Staff observed that the bottle containing distilled water was discolored and was contaminated with mold. Staff also observed dead insects in the pH storage solution cup. The cap on the meter used to measure dissolved oxygen (DO) was scratched, and no extra caps were available on site. A comparator, necessary for comparing *E. coli*

test results to distinguish threshold positive results from negative results, was not available on site.

Staff found food and drink items next to lab samples in the same refrigerator.

IX.

On June 8, 2022, the Division issued a Notice of Violation (NOV) to the Respondent detailing the violations noted during the inspection of May 17, 2022. The NOV advised the Respondent that operation and maintenance of the facility must improve, and instructed the Respondent to:

- review MORs and DMRs for February, March, and April 2022, and make appropriate corrections;
- develop an SOP and keep it at the facility;
- change pH storage solution on a regular basis;
- change or thoroughly clean distilled water containers;
- keep a spare cap for the DO meter on site;
- purchase an IDEXX Quanti-Tray comparator;
- purchase a separate refrigerator for storage of lab samples;
- adjust the *E. coli* incubator to the proper temperature;
- on lab bench sheets, include the analysis method number, or reference the current edition of Standard Methods for Water and Wastewater Analyses.

The NOV further instructed the Respondent to submit a plan of action detailing the corrective actions necessary to address the violations and conditions noted to the Division by July 15, 2022.

X.

From January 2022 through July 15, 2022, the Plant incorrectly reported the following tests on its DMRs, resulting in non-receipt violations:

Parameter	Monitoring Period	Number of Test Values Incorrectly Reported
Carbonaceous BOD, 5-day	February 2022	2
	March 2022	4
	April 2022	3
<i>E. coli</i>	February 2022	2
Nitrogen, Ammonia Total	February 2022	2
	March 2022	4
	April 2022	3
Settleable Solids	February 2022	1
	March 2022	1
	April 2022	1
Chlorine, Total Residual	March 2022	1
	April 2022	1
Phosphorus, Total	March 2022	2
Suspended Solids, Total	April 2022	2
Total Violations		29

The Respondent submitted corrections for all these violations on June 21, 2022, following receipt of the NOV.

XI.

From January 2022 through July 15, 2022, the Plant reported the following effluent limitation exceedances on its Discharge Monitoring Reports:

Parameter	Effluent Exceedances
Carbonaceous BOD, 5-day	4
Chlorine, Total Residual	1
Nitrogen, Ammonia Total	5
Total	10

VIOLATIONS

XII.

By failing to properly operate and maintain the treatment facility (missing screening structures, digester, clarifier, tertiary filtration unit), failing to properly maintain laboratory

equipment, and manually adjusting chlorine dosing, the Respondent has violated the Permit, which states in relevant part:

Section 2.1.3 a

The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory and process controls and appropriate quality assurance procedures.

XIII.

By discharging pollutants to waters of the state in excess of permitted effluent limitations, and by failing to properly report the results of required monitoring, the Respondent has violated the Act:

Tenn. Code Ann. § 69-3-108(b):

It is unlawful for any person, other than a person who discharges into a publicly owned treatment works or a person who is a domestic discharger into a privately owned treatment works, to carry out any of the following activities, except in accordance with the conditions of a valid permit:

- (3) The increase in volume or strength of any wastes in excess of the permissive discharges specified under any existing permit;

Tenn. Code Ann. § 69-3-114(b):

In addition, it is unlawful for any person to act in a manner or degree that is violative of any provision of this part or of any rule, regulation, or standard of water quality promulgated by the Board of any permits or orders issued pursuant to this part; or fail or refuse to file an application for a permit as required in § 69-3-108; or to refuse to furnish, or to falsify any records, information, plans, specifications, or other data required by the Board or the Commissioner under this part.

ORDER AND ASSESSMENT

XIV.

Pursuant to sections 69-3-109, -115, and -116 of the Act, the Director orders, and the Respondent agrees, as follows:

For all payments submitted, please include reference to case number **WPC22-0086**.

1. The Respondent is assessed a **total civil penalty of \$63,264.00. The Respondent shall pay \$10,544.00 to the Division as an upfront allocation of this penalty on or before the thirty-first day following the effective date of this Order.** The remaining \$52,720.00 shall only become due if the Respondent fails to comply with Items 2-6, listed below:
2. On or before the ninetieth day following the effective date of this Order, the Respondent shall develop and submit to the Division for approval an SOP for the monitoring of operational parameters at the Plant. The SOP shall include processes for the collection of samples, recording of sample data, maintenance of monitoring records, maintenance of laboratory stores and equipment, and appropriate quality assurance/quality control practices, according to EPA-approved procedures. The approved SOP shall be kept on the Plant premises available for review. If the Respondent fails to comply with this Item, the Respondent shall pay \$ 231.00 to the Division for each day the SOP is late, not to exceed a total of \$6,930.00.
3. On or before the ninetieth day following the effective date of this Order, the Respondent shall submit to the Division a corrective action plan / engineering report (CAP/ER) describing all steps necessary to address the degraded conditions of treatment structures, laboratory conditions, observations noted in section VIII above, and the effluent limitation exceedances listed in section XI. The CAP/ER shall include a schedule with a specific date of completion for each action. Any changes or modifications to the CAP/ER requested by the Division shall be submitted by the Respondent within 30 days following the request. Final completion of all actions in the CAP/ER shall not exceed three years from Division approval. If the Respondent fails to comply with this Item, the Respondent shall pay \$232.00 to the Division for each day the CAP/ER is late, not to exceed a total of \$6,960.00.

4. Upon Division approval of the CAP/ER, each milestone date of the project schedule shall become an enforceable component of this Order. For each calendar quarter – ending March 31, June 30, September 30, and December 31 – the Respondent shall write a concise progress report detailing the actions taken to that point. The Respondent shall submit each report to the Division not later than the fifteenth business day of the month following the end of the previous quarter. If the Respondent fails to comply with this Item, the Respondent shall pay \$575.00 for each quarterly report that is late, not to exceed a total of \$6,900.00.
5. Within 180 days following completion of all measures in the CAP/ER, the Respondent shall submit a Final Report to the Division for approval. The Final Report shall describe the completion of each scheduled action and shall include a detailed study evaluating the success of the CAP/ER in achieving substantial compliance with the Permit. If the Respondent fails to comply with this Item, the Respondent shall pay \$231.00 for each day that the Final Report is late, not to exceed a total of \$6,930.00.
6. For one year following completion of the CAP/ER, the Respondent shall maintain substantial compliance with the Permit. If the Respondent fails to comply with this Item, as evidenced by effluent violations on the Discharge Monitoring Reports, the Respondent shall pay \$5,000.00 per effluent violation, not to exceed a total of \$25,000.00.

All payments shall be made payable to the “Treasurer, State of Tennessee” and sent to the Division of Fiscal Services - Consolidated Fees Section, Tennessee Department of Environment and Conservation, 10th Floor Snodgrass Bldg., 312 Rosa Parks Avenue, Nashville, Tennessee

37243. The case number, **WPC22-0086**, should be written on all correspondence regarding this matter.

This Order shall be considered closed one year after Division receipt of the Final Report, so long as the Respondent has complied with all Order requirements, all penalties owed have been paid, and the Respondent is in substantial compliance with the Act.

The Effective Date of this Order shall be the date it is signed by Jennifer Dodd, Director of the Division of Water Resources. The Department may, for good cause shown, extend the compliance dates contained within this Order. To be eligible for this time extension, the Respondent shall submit a written request to be received in advance of the compliance date. The written request must include sufficient detail to justify such an extension and include at a minimum the anticipated length of the delay, the precise cause or causes of the delay, and all preventative measures taken to minimize the delay. Any such extension by the Department will be in writing. Should the Respondent fail to meet the requirement by the extended date, any associated civil penalty shall become due 30 days thereafter.

Failure to comply with any of the requirements of this Order could lead to further enforcement actions, which may include additional civil penalties, assessment of damages, and/or recovery costs.

DEPARTMENT'S RESERVATION OF RIGHTS

In entering into this Consent Order, the Department does not implicitly or expressly waive any provision of the Act or the regulations promulgated thereunder or the authority to assess costs, civil penalties, and/or damages incurred by the State against the Respondent. The Department expressly reserves all rights it has at law and in equity to order further corrective action, assess civil penalties and/or damages, and to pursue further enforcement action including, but not limited

to, monetary and injunctive relief. Compliance with this Order will be considered as a mitigating factor in determining the need for future enforcement action(s).

WAIVER OF RIGHT TO APPEAL

The Respondent understands that it has the right to appeal this Order pursuant to sections 69-3-109, -115, and -116 of the Act. By signing below, the Respondent knowingly and voluntarily waives any right it may have to appeal this Order.

RESPONDENT'S RESERVATION OF RIGHTS

The Respondent does not admit or deny the factual allegations or the alleged violations of law contained in this Order. The Respondent reserves its rights to contest the factual allegations and alleged violations contained in this Order in any proceeding other than a proceeding brought by the Department to enforce the terms of this Order.

AUTHORITY TO SIGN

The undersigned representatives of the Department and the Respondent represent and warrant that they are fully authorized and competent to execute this Consent Order and Agreement on behalf of the entity for which they are signing.

Agreed to by Limestone Water Utility Operating Company, LLC, as evidenced by the signature below, and issued by the Director of the Division of Water Resources, on this 13th _____ day of February _____, 2023.


Jennifer Dodd (Feb 13, 2023 13:33 CST)

Jennifer Dodd, Director
Division of Water Resources
Department of Environment and
Conservation



(Representative) Josiah Cox
Limestone Water Utility Operating
Company, LLC

Reviewed by:

Samantha Buller-Young

Samantha Buller-Young
BPR # 040466
Assistant General Counsel
Department of Environment & Conservation
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921
p. (865)-440-8303
Samantha.Buller-Young@tn.gov

67866159.v1

Reviewed by:

Katherine Barnes

Katherine Barnes
BPR # 032456
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
D: (615) 651-6797
Katherine.Barnes@butlersnow.com

From: [Michael Lancaster](#)
To: [Jake Freeman](#)
Cc: [Cody Harris](#); [Enrique Chavez, Jr.](#)
Subject: RE: Proposed timeline and extension request - WPC2-0086 Grassland STP
Date: Thursday, June 29, 2023 6:51:26 AM
Attachments: [image002.png](#)
[image003.png](#)

Good morning Jake,

The schedule you provided will fulfill the order requirement for a Corrective Action Plan. If construction occurs according to the schedule and is complete by July, 2026, this is in line with the schedule we had originally outlined in the order. If you will continue to submit quarterly reports of progress for the project, that will keep everything on track.

If you happen to run into permitting issues or other delays, please provide a written request for extension of compliance dates, with expected dates of completion and an explanation of the causes of delay. I can then submit the request and extend the order as needed.

Thank you,
-Mike



Michael Lancaster – Environmental Consultant
Division of Water Resources
312 Rosa L. Parks Ave.
Nashville, TN 37243
p. (615) 854-0483
michael.lancaster@tn.gov
tn.gov/environment

From: Jake Freeman <jfreeman@cswrgroup.com>
Sent: Tuesday, June 20, 2023 11:44 AM
To: Michael Lancaster <Michael.Lancaster@tn.gov>
Cc: Cody Harris <charris@cswrgroup.com>; Enrique Chavez, Jr. <echavez@cswrgroup.com>
Subject: [EXTERNAL] RE: Proposed timeline and extension request - WPC2-0086 Grassland STP

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Michael,
See the attached preliminary schedule for Grassland from our consulting engineer GMC. Let me know if you have any questions. Thanks.

Jacob O. Freeman, PE

Director, Engineering

Central States Water Resources
1630 Des Peres Rd., Suite 140
Des Peres, MO 63131
Direct: (314) 380-8598
Cell: (314) 550-1167
centralstateswaterresources.com



From: Jake Freeman
Sent: Tuesday, June 13, 2023 11:29 AM
To: Michael Lancaster <Michael.Lancaster@tn.gov>
Cc: Cody Harris <charris@cswrgroup.com>; Enrique Chavez, Jr. <echavez@cswrgroup.com>
Subject: RE: Proposed timeline and extension request - WPC2-0086 Grassland STP

Michael,
Our engineers have been working on the schedule and we are planning to review it this week so I hope to have you something this week still. Thanks for your patience.

Jacob O. Freeman, PE
Director, Engineering

Central States Water Resources
1630 Des Peres Rd., Suite 140
Des Peres, MO 63131
Direct: (314) 380-8598
Cell: (314) 550-1167
centralstateswaterresources.com



From: Michael Lancaster <Michael.Lancaster@tn.gov>
Sent: Friday, June 9, 2023 5:25 AM
To: Jake Freeman <jfreeman@cswrgroup.com>
Subject: Proposed timeline and extension request - WPC2-0086 Grassland STP

Good morning Jake,

Any developments on the proposed timeline for the "4-step process" we discussed previously

regarding the Grassland facility upgrade? Once I receive the proposed timeline, I can begin work on the extension of compliance dates for this order.

Thanks, and have a great day,

-Mike



Michael Lancaster – Environmental Consultant

Division of Water Resources

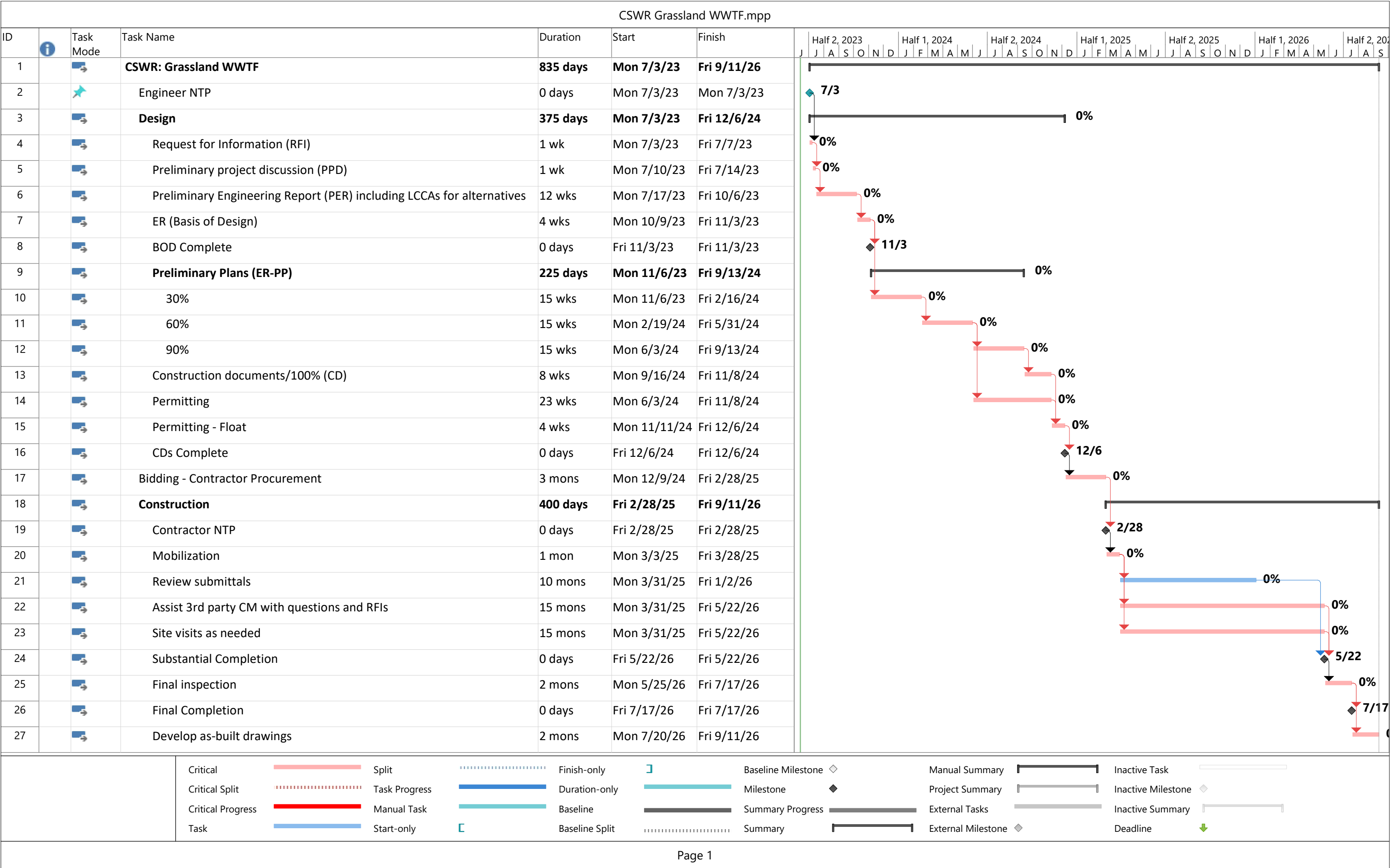
312 Rosa L. Parks Ave.

Nashville, TN 37243

p. (615) 854-0483

michael.lancaster@tn.gov

tn.gov/environment



ATTACHMENT B

From: [Christopher.Daniel Allen](#)
To: [Isabel Sassen](#)
Subject: RE: Aqua Utilities TN0000948 PbCu Customer Notice Certification
Date: Thursday, January 4, 2024 3:30:39 PM
Attachments: [image002.png](#)

Good afternoon Isabel,

The documentation you provided satisfies the requirements requested in the letter sent Nov. 30, 2023, and your system is within compliance. No further action is needed for the 2023 Lead & Copper Monitoring period.

Please keep in mind that the Lead Service Line Inventory due date (Oct. 16, 2024) is quickly approaching, and initial inventories may change the type of sampling schedule your system is on for Lead & Copper Monitoring. After the review period for the Lead & Copper Rule Improvements is over we will have more clarity on what changes will be final. Until then the next Lead & Copper Monitoring period for Aqua Utilities (TN0000948) is summer 2026.

If you have any questions, please feel free to reach out.

Thank you,



Chris Allen|Environmental Scientist
Division of Water Resources|Compliance and Enforcement
Tennessee Tower, 11th Floor
312 Rosa L Parks Ave., Nashville, TN 37243
p. 615-948-0716
f. 615-532-0647
Christopher.Daniel.Allen@tn.gov
www.tn.gov/environment

From: Isabel Sassen <isassen@cswrgroup.com>
Sent: Thursday, January 4, 2024 2:46 PM
To: Christopher.Daniel Allen <Christopher.Daniel.Allen@tn.gov>
Subject: [EXTERNAL] RE: Aqua Utilities TN0000948 PbCu Customer Notice Certification

Hi Chris,

I just want to confirm that this will satisfy the Lead Consumer Notice Violation.

If there is anything left that we need to do please let me know.

Thank you!



Isabel Sassen

Environmental Health and Safety Support Specialist

Email: isassen@cswrgroup.com

O: (314) 464-3964

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131

www.centralstateswaterresources.com

From: Christopher.Daniel Allen <Christopher.Daniel.Allen@tn.gov>

Sent: Thursday, January 4, 2024 9:35 AM

To: Isabel Sassen <isassen@cswrgroup.com>

Subject: RE: Aqua Utilities TN0000948 PbCu Customer Notice Certification

Good morning EHS Specialist Sassen,

The 2023 Lead and Copper Consumer Notice Certification Form (CN-1595) and consumer notice example for Aqua Utilities (TN0000948) has been received.

Thank you,



Chris Allen|Environmental Scientist

Division of Water Resources|Compliance and Enforcement

Tennessee Tower, 11th Floor

312 Rosa L Parks Ave., Nashville, TN 37243

p. 615-948-0716

f. 615-532-0647

Christopher.Daniel.Allen@tn.gov

www.tn.gov/environment

From: Isabel Sassen <isassen@cswrgroup.com>

Sent: Thursday, January 4, 2024 9:21 AM

To: DWRWater Compliance <DWRWater.Compliance@tn.gov>

Cc: Christopher.Daniel Allen <Christopher.Daniel.Allen@tn.gov>

Subject: [EXTERNAL] Aqua Utilities TN0000948 PbCu Customer Notice Certification

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Good Morning

Please see the attached Lead and Copper Results Consumer Notice Certification for Aqua Utilities TN0000948.

Thank you



Isabel Sassen

Environmental Health and Safety Support Specialist

Email: isassen@cswwgroup.com

O: (314) 464-3964

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131

www.centralstateswaterresources.com

SUPPLEMENTAL EXHIBIT 9

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

**JOINT APPLICATION OF LIMESTONE)
WATER UTILITY OPERATING)
COMPANY, LLC AND CUMBERLAND)
BASIN WASTEWATER SYSTEMS, LLC)
FOR APPROVAL OF THE ACQUISITION)
OF AND TO OPERATE THE)
WASTEWATER SYSTEM OF)
CUMBERLAND BASIN WASTEWATER)
SYSTEMS, LLC, AND TO ISSUE A)
CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY)
)**

DOCKET NO. 23-00077

AFFIDAVIT OF JOSIAH COX

STATE OF MISSOURI

COUNTY OF ST. LOUIS

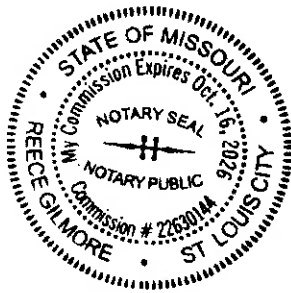
I, Josiah Cox, having been duly sworn in accordance with the law, state as follows.

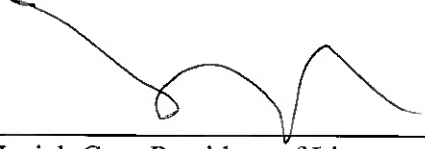
1. I, Josiah Cox, do hereby attest to being President of Limestone Water Utility Operating Company, LLC ("Limestone"). I also am President of CSWR, LLC ("CSWR"), a Limestone affiliate. I am authorized to make this affidavit on behalf of Limestone.

2. I am familiar with and knowledgeable about the Joint Application submitted in the above-captioned matter. I have submitted Pre-filed Testimony in support of the Joint Application.

3. All information submitted concerning the Joint Application in the above-captioned matter is true and correct to the best of my knowledge and belief.

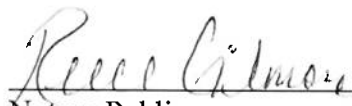
FURTHER AFFIANT SAYETH NOT.





Josiah Cox, President of Limestone Water Utility
Operating Company, LLC

Sworn to and subscribed before me this
4th day of JANUARY, 2024.



Notary Public

My Commission Expires: OCT 16, 2026

SUPPLEMENTAL EXHIBIT 20

STATE OF TENNESSEE

COUNTY OF Putnam

RECEIVED
MAR 10 2023
TN PUBLIC UTILITY COMMISSION
UTILITIES DIVISION

We the undersigned Tim Huddleston
and _____
of Cumberland Basin Wastewater System, LLC

on our oath do severally say that the foregoing return has been prepared,
under our direction, from the original books, papers and records of said
utility; that we have carefully examined the same, and declare the same to be
a correct statement of the business and affairs of said utility for the period
covered by the return in respect to each and every matter and thing therein
set forth, to the best of our knowledge, information and belief.

Tim Huddleston

(Chief Officer)

Tim Huddleston

(Officer in charge of accounts)

Subscribed and sworn to before me this 6th
day of March, 20 23

Notary Public, Brandy Garrett County, Overton
My commission will expire 7-20-26



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Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) _____ A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022		
INCOME STATEMENT					
Account Name (a)	Ref Page (b)	Water (c)	Sewer (d)	Other (e)	Total (f)
Gross Revenue:					
Residential			\$26,097		\$26,097
Commercial			0		0
Industrial			0		0
Multi-Family			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Gross Revenue			\$26,097		\$26,097
Operation & Maint. Expense	W3/S3		\$19,531		\$19,531
Depreciation Expense	F-5		0		0
Amortization Expense			0		0
Other Expense (Please Specify)			0		0
Other Expense (Please Specify)			0		0
Taxes Other Than Income	F-7		0		0
Income Taxes	F-7		0		0
Total Operating Expenses			\$19,531		\$19,531
Net Operating Income			\$6,566		\$6,566
Other Income:					
Nonutility Income			\$0		\$0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Other Income			\$0		\$0
Other Deductions:					
Misc. Nonutility Expenses			\$0		\$0
Other - Interest Expense			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Other Deductions			\$0		\$0
Net Income			\$6,566		\$6,566

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022
COMPARATIVE BALANCE SHEET			
Account Name (a)	Ref Page (b)	Current Year (c)	Previous Year (d)
ASSETS			
Utility Plant in Service (101-105)	F5/W1/S1	\$175,585	\$175,585
Accum. Depreciation and Amortization (108)	F5/W2/S2	52,674	43,895
Net Utility Plant		\$122,911	\$131,690
Cash		\$73,043	\$66,218
Customer Accounts Receivable (141)		0	0
Customer Deposits (132.05)		0	0
Escrow Deposits (132.10)		21,330	15,739
Other Assets (Please Specify)		0	0
Other Assets (Please Specify)		0	0
Total Assets		\$217,283	\$213,647
LIABILITIES AND CAPITAL			
Common Stock Issued (201)	F-6	\$0	\$0
Preferred Stock Issued (204)	F-6	0	0
Other Paid-In Capital (211)		0	0
Retained Earnings (215)	F-6	46,869	40,303
Capital (Proprietary & Partnership-218)	F-6	20,000	20,000
Total Capital		\$66,869	\$60,303
Long-Term Debt (224)	F-6	\$0	\$0
Accounts Payable (231)		0	0
Notes Payable (232)		0	0
Customer Deposits (235)		346	346
Accrued Taxes (236)		0	0
Advances Payable		0	0
Escrowed Deposits (235.1)		27,157	21,307
Other Liabilities (Please Specify)		0	0
Other Liabilities (Please Specify)		0	0
Other Liabilities (Please Specify)		0	0
Advances for Construction		0	0
Contributions In Aid Of Const.-Net (271-2)	F-8	122,911	131,690
Total Liabilities		\$150,414	\$153,344
Total Liabilities & Capital		\$217,283	\$213,647

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022
NET UTILITY PLANT			
Plant Accounts (101-107) Inclusive (a)	Water (c)	Sewer (d)	Other (e)
Utility Plant in Service (101)		\$175,585	\$175,585
Construction Work in Progress (105)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Total Utility Plant		\$175,585	\$175,585
ACCUMULATED DEPRECIATION AND AMORTIZATION OF UTILITY PLANT			
Account 108 (a)	Water (c)	Sewer (d)	Other (e)
Balance First of Year		\$43,895	\$43,895
Credits During Year:			
Accruals charged to Depr. Account		\$8,779	\$8,779
Salvage		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Total Credits		\$8,779	\$8,779
Debits During Year:			
Book/Historical Cost of Plant Retired		\$0	\$0
Cost of Removal		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Total Debits		\$0	\$0
Balance End of Year		\$52,674	\$52,674

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022
CAPITAL STOCK (201 - 204)			
(a)	Common Stock (b)	Preferred Stock (c)	
Par or stated value per share	N/A	N/A	
Shares Authorized	N/A	N/A	
Shares issued and outstanding	N/A	N/A	
Total par value of stock issued	0	0	
Dividends declared per share for year	0	0	
RETAINED EARNINGS (215)			
(a)	Appropriated (b)	Unappropriated (c)	
Balance first of year	0	40,303	
Changes during year NET INCOME/(NET LOSS)	0	6,566	
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Balance end of year	0	46,869	
PROPRIETARY CAPITAL (218)			
(a)	Proprietor (b)	Partner (c)	
Balance first of year	\$20,000		
Deposits from Owners	0		
Net Income	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Balance end of year	\$20,000		
LONG-TERM DEBT (224)			
Description of Obligation including Issue & Maturity Dates (a)	Interest Rate (b)	Year End Balance (c)	
N/A	0.00%	\$0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
Total Long-Term Debt		\$0	

[illegible]

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022
CONTRIBUTIONS IN AID OF CONSTRUCTION (271)			
Description (a)	Water (b)	Sewer (c)	Total (d)
Balance First of Year		\$131,690	\$131,690
Add Credits During Year			0
Less Charges During Year		8,779	8,779
Balance End of Year		\$122,911	\$122,911
Less Accumulated Amortization		0	0
Net Contributions in Aid of Construction		\$122,911	\$122,911
ADDITIONS TO CONTRIBUTIONS IN AID OF CONSTRUCTION DURING YEAR (CREDITS)			
Report below all developers or contractors agreements from which cash or property was received during the year (a)	Indicate "Cash" or "Property" (b)	Water (c)	Sewer (d)
Contractor or Developer #1			\$0
Contractor or Developer #2			0
Contractor or Developer #3			0
Contractor or Developer #4			0
Contractor or Developer #5			0
Contractor or Developer #6			0
Contractor or Developer #7			0
Contractor or Developer #8			0
Contractor or Developer #9			0
Contractor or Developer #10			0
Contractor or Developer #11			0
Contractor or Developer #12			0
Contractor or Developer #13			0
Contractor or Developer #14			0
Contractor or Developer #15			0
Contractor or Developer #16			0
Contractor or Developer #17			0
Contractor or Developer #18			0
Contractor or Developer #19			0
Contractor or Developer #20			0
Contractor or Developer #21			0
Contractor or Developer #22			0
Contractor or Developer #23			0
Contractor or Developer #24			0
Contractor or Developer #25			0
Contractor or Developer #26			0
Contractor or Developer #27			0
Contractor or Developer #28			0
Contractor or Developer #29			0
Contractor or Developer #30			0
Total Credits During Year			\$0

Name of Respondent Cumberland Basin Wastewater System					This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Date of Report (Mo, Da, Yr) 3-31-2023		Year of Report 2022	
ANALYSIS OF ACCUMULATED DEPRECIATION BY PRIMARY ACCOUNT - SEWER										
Account Number (a)	Account (b)	Average Service Life in Years (c)	Average Salvage Value in Percent (d)	Depreciation Rate Applied* (e)	Accumulated Depreciation Balance Previous Year (f)	Debits (g)	Credits (h)	Accumulated Depreciation Balance End of Year (i)		
354	Structures & Improvements	0	0.00%	0.00%	\$0	\$0	\$0	\$0		
360	Collection Sewers - Force	0	0.00%	0.00%	0	0	0	0		
361	Collection Sewers - Gravity	0	0.00%	0.00%	0	0	0	0		
362	Special Collecting Structures	0	0.00%	0.00%	0	0	0	0		
363	Services to Customers	0	0.00%	0.00%	0	0	0	0		
364	Flow Measuring Devices	0	0.00%	0.00%	0	0	0	0		
365	Flow Measuring Installations	0	0.00%	0.00%	0	0	0	0		
370	Receiving Wells	0	0.00%	0.00%	0	0	0	0		
371	Pumping Equipment	0	0.00%	0.00%	0	0	0	0		
380	Treatment & Disposal Equipment	20	0.00%	0.00%	43,895	0	8,779	52,675		
381	Plant Sewers	0	0.00%	0.00%	0	0	0	0		
382	Outfall Sewer Lines	0	0.00%	0.00%	0	0	0	0		
389	Other Plant & Miscellaneous Equipment	0	0.00%	0.00%	0	0	0	0		
390	Office Furniture & Equipment	0	0.00%	0.00%	0	0	0	0		
391	Transportation Equipment	0	0.00%	0.00%	0	0	0	0		
392	Stores Equipment	0	0.00%	0.00%	0	0	0	0		
393	Tools, Shop & Garage Equipment	0	0.00%	0.00%	0	0	0	0		
394	Laboratory Equipment	0	0.00%	0.00%	0	0	0	0		
395	Power Operated Equipment	0	0.00%	0.00%	0	0	0	0		
396	Communication Equipment	0	0.00%	0.00%	0	0	0	0		
397	Miscellaneous Equipment	0	0.00%	0.00%	0	0	0	0		
398	Other Tangible Plant	0	0.00%	0.00%	0	0	0	0		
Totals					\$43,895	\$0	\$8,779	\$52,675		
*State basis used for percentages used in schedule.										

Name of Respondent		This Report is:	Date of Report	Year of Report
Cumberland Basin Wastewater System		(1) <u>X</u> An Original (2) <u> </u> A Resubmission	(Mo, Da, Yr) 3-31-2023	2022
SEWER OPERATION & MAINTENANCE EXPENSE				
Acct No.	Description (a)	Amount (b)		
701	Salaries & Wages - Employees	\$0		
703	Salaries & Wages - Officers, Directors & Stockholders	0		
704	Employee Pensions & Benefits	0		
710	Purchased Sewage Treatment	0		
711	Sludge Removal Expense	0		
715	Purchased Power	1,096		
716	Fuel for Power Production	0		
718	Chemicals	0		
720	Materials & Supplies	221		
730	Contractual Services	15,464		
740	Rents	0		
750	Transportation Expense	0		
755	Insurance Expense	0		
765	Regulatory Commission Expense	116		
770	Bad Debt Expense	0		
775	Miscellaneous Expenses	2,634		
	Total Sewer Operation & Maintenance Expense	\$19,531		

SEWER CUSTOMERS				
Description (a)	Customers First of Year (b)	Additions (c)	Disconnections (d)	Customers End of Year (e)
Metered Customers:				
5/8 Inch	33	4	0	37
3/4 Inch	0	0	0	0
1.0 Inch	0	0	0	0
1.5 Inch	0	0	0	0
2.0 Inch	0	0	0	0
2.5 Inch	0	0	0	0
3.0 Inch	0	0	0	0
4.0 Inch	0	0	0	0
6.0 Inch	0	0	0	0
8.0 Inch	0	0	0	0
Other (Please Specify)	0	0	0	0
Other (Please Specify)	0	0	0	0
Other (Please Specify)	0	0	0	0
Unmetered Customers	0	0	0	0
Total Customers	33	4	0	37

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) ___ A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022
---	--	--	-------------------------------

PUMPING EQUIPMENT

Description*** (a)	Lift Station The Bluffs (b)	Lift Station Genesis (c)	Lift Station #3 (d)	Lift Station #4 (e)
Make, Model, or Type of Pump	N/A	Gould		
Year Installed		2017		
Rated Capacity (GPM)		75 GPM		
Size (HP)		1/2 HP		
Power (Electric/Mechanical)		1 PH/220 V		
Make, Model or Type of Motor		N/A		

SERVICE CONNECTIONS

Description*** (a)	Service Connection The Bluffs (b)	Service Connection Genesis (c)	Service Connection #3 (d)	Service Connection #4 (e)
Size (Inches)	1"	4"		
Type (PVC, VCP, etc)	PVC	PVC		
Average Length (Feet)	40 LF	70 LF		
Connections-Beginning of Year	5	28	0	0
Connections-Added during Year	2	2	0	0
Connection-Retired during Year	0	0	0	0
Connections-End of Year	7	30	0	0
Number of Inactive Connections	0	0	0	0

COLLECTING MAINS, FORCE MAINS, & MANHOLES

Description (a)	Collecting Mains (b)	Force Mains (c)	Manholes (d)
Size (Inches)	2-3", 8"	4"	N/A
Type	PVC	PVC	N/A
Length/Number-Beginning of Year	21,510 LF	580 LF	0
Length/Number-Added During Year	0 LF	0 LF	0
Length/Number-Retired During Year	0 LF	0 LF	0
Length/Number-End of Year	21,510 LF	580 LF	0

***If more space is needed to list equipment please attach additional sheets as necessary.

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2023	Year of Report 2022
TREATMENT PLANT			
Description*** (a)	Treatment Facility The Bluffs (b)	Treatment Facility Genesis (c)	Treatment Facility #3 (d)
Manufacturer	Oreco	Aquapoint	
Type	Bio Contact	Bio Contact	
Steel or Concrete	FRP	FRP	
Total Capacity	43,750 GPD	30,000 GPD	
Average Daily Flow	428 GPD	4,374 GPD	
Effluent Disposal	428 GPD	4,374 GPD	
Total Gallons of Sewage Treated	428 GPD	4,374 GPD	

MASTER LIFT STATION PUMPS				
Description*** (a)	Master Pump The Bluffs (b)	Master Pump Genesis (c)	Master Pump #3 (d)	Master Pump #4 (e)
Manufacturer	Oreco	Starite		
Capacity (GPM)	75 GPM	50 GPM		
Size (HP)	1.0 HP	1.5 HP		
Power (Electric/Mechanical)	1 PH/220 V	230 V		
Make, Model, or Type of Motor	Franklin	N/A		

OTHER SEWER SYSTEM INFORMATION	
Present Number of Equivalent Residential Customer's * being served	37
Maximum Number of Equivalent Residential Customer's * that the system can efficiently serve	273
Estimated Annual Increase in Equivalent Residential Customers *	10
* Equivalent Residential Customers = (Total Gallons Treated / 365 Days) / 275 Gallons Per Day. Total Gallons Treated includes both sewage treated and purchased sewage treatment.	
State any plans and estimated completion dates for any enlargements of this system: N/A	
If the present systems do not meet environmental requirements, please submit the following: A. An evaluation of the present plant or plants in regard to meeting the requirements. B. Plans for funding and construction of the required upgrading. C. The date construction will begin. N/A	
What is the percent of the certificated area that have service connections installed? All (100%) of the certificated area of CBWS have service connections in place.	

***If more space is needed to list equipment please attach additional sheets as necessary.

Name of Respondent	This Report is:	Date of Report	Year of Report
Cumberland Basin Wastewater System	(1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	(Mo, Da, Yr) 3-31-2023	2022
SUPPLEMENTAL FINANCIAL DATA TO THE ANNUAL REPORT			
Rate Base			
Additions:			
Plant In Service		\$175,585	
Construction Work in Progress		0	
Property Held For Future Use		0	
Materials & Supplies		0	
Working Capital Allowance		0	
Escrow Deposits		21,330	
Other Additions (Please Specify)		0	
Total Additions to Rate Base		\$196,915	
Deductions:			
Accumulated Depreciation		\$52,674	
Accumulated Deferred Income Taxes		0	
Pre 1971 Unamortized Investment Tax Credit		0	
Customer Deposits		346	
Contributions in Aid of Construction		122,911	
Escrow Liability		27,157	
Other Deductions (Please Specify)		0	
Total Deductions to Rate Base		\$203,088	
Rate Base		-\$6,173	
Adjusted Net Operating Income			
Operating Revenues:			
Residential		\$26,097	
Commercial		0	
Industrial		0	
Public Authorities		0	
Multiple Family		0	
Fire Protection		0	
All Other		0	
Total Operating Revenues		\$26,097	
Operating Expenses:			
Operation		\$19,531	
Depreciation		0	
Amortization		0	
Taxes Other Than Income Taxes		0	
Income Taxes		0	
Total Operating Expense		\$19,531	
Net Operating Income		\$6,566	
Other (Please Specify)		0	
Other (Please Specify)		0	
Adjusted Net Operating Income		\$6,566	
Rate of Return (Line 49 / Line 25)		-106.36%	
All amounts should be calculated in a manner consistent with the last Rate Order issued by the Commission for this Company.			

Cumberland Basin Wastewater System
Activity Report for Escrow Account
For the Twelve Months Ended December 31, 2022

SU-2

Escrow Liability Required Per Books (Account 235.1)					Escrow Assets Provided Per Bank (Account 132.10)				
Month	Beginning Balance	Accrued Into Escrow	Removed From Escrow	Ending Balance	Beginning Balance	Deposited Into Escrow	Removed From Escrow	Ending Balance	
January	\$21,307.37	\$467.53	\$0.00	\$21,774.90	\$15,738.64	\$0.00	\$0.00	\$15,738.64	
February	21,774.90	\$467.53	0.00	22,242.43	15,738.64	0.00	0.00	15,738.64	
March	22,242.43	\$467.53	0.00	22,709.96	15,738.64	5,568.73	0.00	21,307.37	
April	22,709.96	\$467.53	0.00	23,177.49	21,307.37	0.00	0.00	21,307.37	
May	23,177.49	\$497.41	0.00	23,674.90	21,307.37	0.00	0.00	21,307.37	
June	23,674.90	\$497.41	0.00	24,172.31	21,307.37	0.00	0.00	21,307.37	
July	24,172.31	\$497.41	0.00	24,669.72	21,307.37	0.00	0.00	21,307.37	
August	24,669.72	\$497.41	0.00	25,167.13	21,307.37	0.00	0.00	21,307.37	
September	25,167.13	\$497.41	0.00	25,664.54	21,307.37	0.00	0.00	21,307.37	
October	25,664.54	\$497.41	0.00	26,161.95	21,307.37	0.00	0.00	21,307.37	
November	26,161.95	\$497.41	0.00	26,659.36	21,307.37	0.00	0.00	21,307.37	
December	26,659.36	\$497.41	0.00	27,156.77	21,307.37	22.40	0.00	21,329.77	
Total		\$5,849.40	\$0.00			\$5,591.13	\$0.00		

Total Balance at End of Fiscal Year:

Escrow Assets	\$21,329.77
Escrow Liability	27,156.77
Net Escrow Assets (Shortfall)	<u><u>-\$5,827.00</u></u>



P.O. Box 379
Livingston, TN 38570



Last statement: September 30, 2022
This statement: December 31, 2022
Total days in statement period: 92

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(0)

RETURN SERVICE REQUESTED

114601-02A**006439



CUMBERLAND BASIN WASTEWATER SYSTEMS, LLC
BLUFFS ESCROW ACCOUNT
150 CONSTRUCTION DRIVE
PO BOX 239
LIVINGSTON TN 38570-0239

Direct inquiries to:
931-823-1261

First Natl Bank Of Tennessee
PO Box 379
Livingston TN 38570

Basic Savings Non-Personal

Account number 0009258789
Interest paid year to date \$14.82

DAILY ACTIVITY

Date	Description	Additions	Subtractions	Balance
09-30	Beginning balance			\$14,284.80
10-31	Interest Credit	2.33		14,287.13
11-30	Interest Credit	2.94		14,290.07
12-31	Interest Credit	3.03		14,293.10
12-31	Ending totals	8.30	.00	\$14,293.10

INTEREST INFORMATION

Annual percentage yield earned	0.23%
Interest-bearing days	92
Average balance for APY	\$14,287.34
Interest earned	\$8.30

OVERDRAFT/RETURN ITEM FEES

	Total for this period	Total year-to-date
Total Overdraft Fees	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00



Thank you for banking with First Natl Bank of Tennessee





P.O. Box 379
Livingston, TN 38570

Last statement: June 30, 2022
This statement: September 30, 2022
Total days in statement period: 92

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*****AUTO**SCH 5-DIGIT 38556
6401 0.4350 AV 0.455 14 1 65
CUMBERLAND BASIN WASTEWATER SYSTEMS, LLC
BLUFFS ESCROW ACCOUNT
150 CONSTRUCTION DRIVE
PO BOX 239
LIVINGSTON TN 38570-0239

Direct inquiries to:
931-823-1261

First Natl Bank Of Tennessee
PO Box 379
Livingston TN 38570

Basic Savings Non-Personal

Account number 0009258789
Interest paid year to date \$6.52

DAILY ACTIVITY

Date	Description	Additions	Subtractions	Balance
06-30	Beginning balance			\$14,281.24
07-31	Interest Credit	.61		14,281.85
08-31	Interest Credit	1.19		14,283.04
09-30	Interest Credit	1.76		14,284.80
09-30	Ending totals	3.56	.00	\$14,284.80

INTEREST INFORMATION

Annual percentage yield earned 0.10%
Interest-bearing days 92
Average balance for APY \$14,282.03
Interest earned \$3.56

OVERDRAFT/RETURN ITEM FEES

	Total for this period	Total year-to-date
Total Overdraft Fees	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00

Thank you for banking with First Natl Bank of Tennessee





P.O. Box 379
Livingston, TN 38570

Last statement: March 31, 2022
This statement: June 30, 2022
Total days in statement period: 91

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(0)

*****AUTO**SCH 5-DIGIT 38556
6378 1.0110 AV 0.426 22 1 211
CUMBERLAND BASIN WASTEWATER SYSTEMS, LLC
BLUFFS ESCROW ACCOUNT
150 CONSTRUCTION DRIVE
PO BOX 239
LIVINGSTON TN 38570-0239

Direct inquiries to:
931-823-1261

First Natl Bank Of Tennessee
PO Box 379
Livingston TN 38570

Basic Savings Non-Personal

Account number 0009258789
Interest paid year to date \$2.96

DAILY ACTIVITY

Date	Description	Additions	Subtractions	Balance
03-31	Beginning balance			\$14,279.46
04-30	Interest Credit	.59		14,280.05
05-31	Interest Credit	.61		14,280.66
06-30	Interest Credit	.58		14,281.24
06-30	Ending totals	1.78	.00	\$14,281.24

INTEREST INFORMATION

Annual percentage yield earned	0.05%
Interest-bearing days	91
Average balance for APY	\$14,280.06
Interest earned	\$1.78

OVERDRAFT/RETURN ITEM FEES

	Total for this period	Total year-to-date
Total Overdraft Fees	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00



Thank you for banking with First Natl Bank of Tennessee





P.O. Box 379
Livingston, TN 38570

Last statement: December 31, 2021
This statement: March 31, 2022
Total days in statement period: 90

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(0)

*****AUTO**SCH 5-DIGIT 38556
6393 0.4350 AV 0.426 14 1 52
CUMBERLAND BASIN WASTEWATER SYSTEMS, LLC
BLUFFS ESCROW ACCOUNT
150 CONSTRUCTION DRIVE
PO BOX 239
LIVINGSTON TN 38570-0239

Direct inquiries to:
931-823-1261

First Natl Bank Of Tennessee
PO Box 379
Livingston TN 38570

Basic Savings Non-Personal

Account number 0009258789
Interest paid year to date \$1.18

DAILY ACTIVITY

Date	Description	Additions	Subtractions	Balance
12-31	Beginning balance			\$8,709.55
01-31	Interest Credit	.37		8,709.92
02-28	Interest Credit	.34		8,710.26
03-18	Transfer Credit TRANSFER FROM DEPOSIT ACCOUNT XXXX2955	5,568.73		14,278.99
03-31	Interest Credit	.47		14,279.46
03-31	Ending totals	5,569.91	.00	\$14,279.46

INTEREST INFORMATION

Annual percentage yield earned 0.05%
Interest-bearing days 90
Average balance for APY \$9,576.16
Interest earned \$1.18

OVERDRAFT/RETURN ITEM FEES

	Total for this period	Total year-to-date
Total Overdraft Fees	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00



STATE OF TENNESSEE

COUNTY OF Putnam

We the undersigned Tim Huddleston
and
of Cumberland Basin Wastewater System, LLC

on our oath do severally say that the foregoing return has been prepared,
under our direction, from the original books, papers and records of said
utility; that we have carefully examined the same, and declare the same to be
a correct statement of the business and affairs of said utility for the period
covered by the return in respect to each and every matter and thing therein
set forth, to the best of our knowledge, information and belief.

(Chief Officer)

(Officer in charge of accounts)

Subscribed and sworn to before me this
day of, 20.

Notary Public, County,

My commission will expire.

(Seal)

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Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021		
INCOME STATEMENT					
Account Name (a)	Ref Page (b)	Water (c)	Sewer (d)	Other (e)	Total (f)
Gross Revenue:					
Residential			\$26,787		\$26,787
Commercial			0		0
Industrial			0		0
Multi-Family			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Gross Revenue			\$26,787		\$26,787
Operation & Maint. Expense	W3/S3		\$17,601		\$17,601
Depreciation Expense	F-5		0		0
Amortization Expense			0		0
Other Expense (Please Specify)			0		0
Other Expense (Please Specify)			0		0
Taxes Other Than Income	F-7		1,333		1,333
Income Taxes	F-7		0		0
Total Operating Expenses			\$18,934		\$18,934
Net Operating Income			\$7,853		\$7,853
Other Income:					
Nonutility Income			\$0		\$0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Other Income			\$0		\$0
Other Deductions:					
Misc. Nonutility Expenses			\$0		\$0
Other - Interest Expense			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Other Deductions			\$0		\$0
Net Income			\$7,853		\$7,853

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
COMPARATIVE BALANCE SHEET			
Account Name (a)	Ref Page (b)	Current Year (c)	Previous Year (d)
ASSETS			
Utility Plant in Service (101-105)	F5/W1/S1	\$175,585	\$175,585
Accum. Depreciation and Amortization (108)	F5/W2/S2	43,895	35,116
Net Utility Plant		\$131,690	\$140,469
Cash		\$66,218	\$57,454
Customer Accounts Receivable (141)		0	0
Customer Deposits (132.05)		0	0
Escrow Deposits (132.10)		15,739	11,073
Other Assets (Please Specify)		0	0
Other Assets (Please Specify)		0	0
Total Assets		\$213,647	\$208,997
LIABILITIES AND CAPITAL			
Common Stock Issued (201)	F-6	\$0	\$0
Preferred Stock Issued (204)	F-6	0	0
Other Paid-In Capital (211)		0	0
Retained Earnings (215)	F-6	40,303	32,450
Capital (Proprietary & Partnership-218)	F-6	20,000	20,000
Total Capital		\$60,303	\$52,450
Long-Term Debt (224)	F-6	\$0	\$0
Accounts Payable (231)		0	0
Notes Payable (232)		0	0
Customer Deposits (235)		346	346
Accrued Taxes (236)		0	0
Advances Payable		0	0
Escrowed Deposits (235.1)		21,307	15,731
Other Liabilities (Please Specify)		0	0
Other Liabilities (Please Specify)		0	0
Other Liabilities (Please Specify)		0	0
Advances for Construction		0	0
Contributions In Aid Of Const.-Net (271-2)	F-8	131,690	140,469
Total Liabilities		\$153,344	\$156,547
Total Liabilities & Capital		\$213,647	\$208,997

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
NET UTILITY PLANT			
Plant Accounts (101-107) Inclusive (a)	Water (c)	Sewer (d)	Other (e)
			Total (f)
Utility Plant in Service (101)		\$175,585	\$175,585
Construction Work in Progress (105)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Total Utility Plant		\$175,585	\$175,585
ACCUMULATED DEPRECIATION AND AMORTIZATION OF UTILITY PLANT			
Account 108 (a)	Water (c)	Sewer (d)	Other (e)
			Total (f)
Balance First of Year		\$35,116	\$35,116
Credits During Year:			
Accruals charged to Depr. Account		\$8,779	\$8,779
Salvage		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Total Credits		\$8,779	\$8,779
Debits During Year:			
Book/Historical Cost of Plant Retired		\$0	\$0
Cost of Removal		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Total Debits		\$0	\$0
Balance End of Year		\$43,895	\$43,895

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
CAPITAL STOCK (201 - 204)			
(a)	Common Stock (b)	Preferred Stock (c)	
Par or stated value per share	N/A	N/A	
Shares Authorized	N/A	N/A	
Shares issued and outstanding	N/A	N/A	
Total par value of stock issued	0	0	
Dividends declared per share for year	0	0	
RETAINED EARNINGS (215)			
(a)	Appropriated (b)	Unappropriated (c)	
Balance first of year	0	32,450	
Changes during year NET INCOME/(NET LOSS)	0	7,853	
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Balance end of year	0	40,303	
PROPRIETARY CAPITAL (218)			
(a)	Proprietor (b)	Partner (c)	
Balance first of year	\$20,000		
Deposits from Owners	0		
Net Income	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Balance end of year	\$20,000		
LONG-TERM DEBT (224)			
(a)	Interest Rate (b)	Year End Balance (c)	
N/A	0.00%	\$0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
Total Long-Term Debt		\$0	

[illegible]

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
CONTRIBUTIONS IN AID OF CONSTRUCTION (271)			
Description (a)	Water (b)	Sewer (c)	Total (d)
Balance First of Year		\$140,469	\$140,469
Add Credits During Year			0
Less Charges During Year		8,779	8,779
Balance End of Year		\$131,690	\$131,690
Less Accumulated Amortization		0	0
Net Contributions in Aid of Construction		\$131,690	\$131,690
ADDITIONS TO CONTRIBUTIONS IN AID OF CONSTRUCTION DURING YEAR (CREDITS)			
Report below all developers or contractors agreements from which cash or property was received during the year (a)	Indicate "Cash" or "Property" (b)	Water (c)	Sewer (d)
Contractor or Developer #1			\$0
Contractor or Developer #2			0
Contractor or Developer #3			0
Contractor or Developer #4			0
Contractor or Developer #5			0
Contractor or Developer #6			0
Contractor or Developer #7			0
Contractor or Developer #8			0
Contractor or Developer #9			0
Contractor or Developer #10			0
Contractor or Developer #11			0
Contractor or Developer #12			0
Contractor or Developer #13			0
Contractor or Developer #14			0
Contractor or Developer #15			0
Contractor or Developer #16			0
Contractor or Developer #17			0
Contractor or Developer #18			0
Contractor or Developer #19			0
Contractor or Developer #20			0
Contractor or Developer #21			0
Contractor or Developer #22			0
Contractor or Developer #23			0
Contractor or Developer #24			0
Contractor or Developer #25			0
Contractor or Developer #26			0
Contractor or Developer #27			0
Contractor or Developer #28			0
Contractor or Developer #29			0
Contractor or Developer #30			0
Total Credits During Year			\$0

Name of Respondent		This Report is:		Date of Report	Year of Report
Cumberland Basin Wastewater System		(1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		(Mo, Da, Yr) 3-31-2022	2021
SEWER UTILITY PLANT ACCOUNTS					
Acct No. (a)	Account Name (b)	Previous Year (c)	Additions (d)	Retirements (e)	Current Year (f)
351	Organization	\$0	\$0	\$0	\$0
352	Franchises	0	0	0	0
353	Land & Land Rights	0	0	0	0
354	Structures & Improvements	0	0	0	0
360	Collection Sewers - Force	0	0	0	0
361	Collection Sewers - Gravity	0	0	0	0
362	Special Collecting Structures	0	0	0	0
363	Services to Customers	0	0	0	0
364	Flow Measuring Devices	0	0	0	0
365	Flow Measuring Installations	0	0	0	0
370	Receiving Wells	0	0	0	0
371	Pumping Equipment	0	0	0	0
380	Treatment & Disposal Equipment	175,585	0	0	175,585
381	Plant Sewers	0	0	0	0
382	Outfall Sewer Lines	0	0	0	0
389	Other Plant & Miscellaneous Equipment	0	0	0	0
390	Office Furniture & Equipment	0	0	0	0
391	Transportation Equipment	0	0	0	0
392	Stores Equipment	0	0	0	0
393	Tools, Shop & Garage Equipment	0	0	0	0
394	Laboratory Equipment	0	0	0	0
395	Power Operated Equipment	0	0	0	0
396	Communication Equipment	0	0	0	0
397	Miscellaneous Equipment	0	0	0	0
398	Other Tangible Plant	0	0	0	0
	Total Sewer Plant	\$175,585	\$0	\$0	\$175,585

Name of Respondent		This Report is:			Date of Report	Year of Report		
Cumberland Basin Wastewater System		(1) <u> X </u> An Original (2) <u> </u> A Resubmission			(Mo, Da, Yr) 3-31-2022	2021		
ANALYSIS OF ACCUMULATED DEPRECIATION BY PRIMARY ACCOUNT - SEWER								
Account Number (a)	Account (b)	Average Service Life in Years (c)	Average Salvage Value in Percent (d)	Depreciation Rate Applied* (e)	Accumulated Depreciation Balance Previous Year (f)	Debits (g)	Credits (h)	Accumulated Depreciation Balance End of Year (i)
354	Structures & Improvements	0	0.00%	0.00%	\$0	\$0	\$0	\$0
360	Collection Sewers - Force	0	0.00%	0.00%	0	0	0	0
361	Collection Sewers - Gravity	0	0.00%	0.00%	0	0	0	0
362	Special Collecting Structures	0	0.00%	0.00%	0	0	0	0
363	Services to Customers	0	0.00%	0.00%	0	0	0	0
364	Flow Measuring Devices	0	0.00%	0.00%	0	0	0	0
365	Flow Measuring Installations	0	0.00%	0.00%	0	0	0	0
370	Receiving Wells	0	0.00%	0.00%	0	0	0	0
371	Pumping Equipment	0	0.00%	0.00%	0	0	0	0
380	Treatment & Disposal Equipment	20	0.00%	0.00%	35,116	0	8,779	43,895
381	Plant Sewers	0	0.00%	0.00%	0	0	0	0
382	Outfall Sewer Lines	0	0.00%	0.00%	0	0	0	0
389	Other Plant & Miscellaneous Equipment	0	0.00%	0.00%	0	0	0	0
390	Office Furniture & Equipment	0	0.00%	0.00%	0	0	0	0
391	Transportation Equipment	0	0.00%	0.00%	0	0	0	0
392	Stores Equipment	0	0.00%	0.00%	0	0	0	0
393	Tools, Shop & Garage Equipment	0	0.00%	0.00%	0	0	0	0
394	Laboratory Equipment	0	0.00%	0.00%	0	0	0	0
395	Power Operated Equipment	0	0.00%	0.00%	0	0	0	0
396	Communication Equipment	0	0.00%	0.00%	0	0	0	0
397	Miscellaneous Equipment	0	0.00%	0.00%	0	0	0	0
398	Other Tangible Plant	0	0.00%	0.00%	0	0	0	0
Totals					\$35,116	\$0	\$8,779	\$43,895
*State basis used for percentages used in schedule.								

Name of Respondent		This Report is:	Date of Report	Year of Report
Cumberland Basin Wastewater System		(1) <input checked="" type="checkbox"/> An Original	(Mo, Da, Yr)	
		(2) <input type="checkbox"/> A Resubmission	3-31-2022	2021
SEWER OPERATION & MAINTENANCE EXPENSE				
Acct No.	Description (a)	Amount (b)		
701	Salaries & Wages - Employees	\$0		
703	Salaries & Wages - Officers, Directors & Stockholders	0		
704	Employee Pensions & Benefits	0		
710	Purchased Sewage Treatment	0		
711	Sludge Removal Expense	0		
715	Purchased Power	1,145		
716	Fuel for Power Production	0		
718	Chemicals	0		
720	Materials & Supplies	0		
730	Contractual Services	15,727		
740	Rents	0		
750	Transportation Expense	0		
755	Insurance Expense	0		
765	Regulatory Commission Expense	116		
770	Bad Debt Expense	0		
775	Miscellaneous Expenses	613		
	Total Sewer Operation & Maintenance Expense	\$17,601		

SEWER CUSTOMERS				
Description (a)	Customers First of Year (b)	Additions (c)	Disconnections (d)	Customers End of Year (e)
Metered Customers:				
5/8 Inch	34	0	1	33
3/4 Inch	0	0	0	0
1.0 Inch	0	0	0	0
1.5 Inch	0	0	0	0
2.0 Inch	0	0	0	0
2.5 Inch	0	0	0	0
3.0 Inch	0	0	0	0
4.0 Inch	0	0	0	0
6.0 Inch	0	0	0	0
8.0 Inch	0	0	0	0
Other (Please Specify)	0	0	0	0
Other (Please Specify)	0	0	0	0
Other (Please Specify)	0	0	0	0
Unmetered Customers	0	0	0	0
Total Customers	34	0	1	33

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) _____ A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
PUMPING EQUIPMENT			
Description*** (a)	Lift Station The Bluffs (b)	Lift Station Genesis (c)	Lift Station #3 (d)
Make, Model, or Type of Pump	N/A	Gould	
Year Installed		2017	
Rated Capacity (GPM)		75 GPM	
Size (HP)		1/2 HP	
Power (Electric/Mechanical)		1 PH/220 V	
Make, Model or Type of Motor		N/A	
SERVICE CONNECTIONS			
Description*** (a)	Service Connection The Bluffs (b)	Service Connection Genesis (c)	Service Connection #3 (d)
Size (Inches)	1"	4"	
Type (PVC, VCP, etc)	PVC	PVC	
Average Length (Feet)	40 LF	70 LF	
Connections-Beginning of Year	5	29	0
Connections-Added during Year	0	0	0
Connection-Retired during Year	0	1	0
Connections-End of Year	5	28	0
Number of Inactive Connections	0	0	0
COLLECTING MAINS, FORCE MAINS, & MANHOLES			
Description (a)	Collecting Mains (b)	Force Mains (c)	Manholes (d)
Size (Inches)	2-3", 8"	4"	N/A
Type	PVC	PVC	N/A
Length/Number-Beginning of Year	21,510 LF	580 LF	0
Length/Number-Added During Year	0 LF	0 LF	0
Length/Number-Retired During Year	0 LF	0 LF	0
Length/Number-End of Year	21,510 LF	580 LF	0

***If more space is needed to list equipment please attach additional sheets as necessary.

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
TREATMENT PLANT			
Description*** (a)	Treatment Facility The Bluffs (b)	Treatment Facility Genesis (c)	Treatment Facility #3 (d)
Manufacturer	Orenco	Aquapoint	
Type	Bio Contact	Bio Contact	
Steel or Concrete	FRP	FRP	
Total Capacity	43,750 GPD	30,000 GPD	
Average Daily Flow	428 GPD	4,374 GPD	
Effluent Disposal	428 GPD	4,374 GPD	
Total Gallons of Sewage Treated	428 GPD	4,374 GPD	
MASTER LIFT STATION PUMPS			
Description*** (a)	Master Pump The Bluffs (b)	Master Pump Genesis (c)	Master Pump #3 (d)
Manufacturer	Orenco	Starite	
Capacity (GPM)	75 GPM	50 GPM	
Size (HP)	1.0 HP	1.5 HP	
Power (Electric/Mechanical)	1 PH/220 V	230 V	
Make, Model, or Type of Motor	Franklin	N/A	
OTHER SEWER SYSTEM INFORMATION			
Present Number of Equivalent Residential Customer's * being served	33		
Maximum Number of Equivalent Residential Customer's * that the system can efficiently serve	273		
Estimated Annual Increase in Equivalent Residential Customers *	10		
* Equivalent Residential Customers = (Total Gallons Treated / 365 Days) / 275 Gallons Per Day. Total Gallons Treated includes both sewage treated and purchased sewage treatment.			
State any plans and estimated completion dates for any enlargements of this system: <u>N/A</u>			
If the present systems do not meet environmental requirements, please submit the following: A. An evaluation of the present plant or plants in regard to meeting the requirements. B. Plans for funding and construction of the required upgrading. C. The date construction will begin. N/A			
What is the percent of the certificated area that have service connections installed? <u>All (100%) of the certificated area of CBWS have service connections in place.</u>			

***If more space is needed to list equipment please attach additional sheets as necessary.

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2022	Year of Report 2021
SUPPLEMENTAL FINANCIAL DATA TO THE ANNUAL REPORT			
Rate Base			
Additions:			
Plant In Service		\$175,585	
Construction Work in Progress		0	
Property Held For Future Use		0	
Materials & Supplies		0	
Working Capital Allowance		0	
Escrow Deposits		15,739	
Other Additions (Please Specify)		0	
Total Additions to Rate Base		\$191,324	
Deductions:			
Accumulated Depreciation		\$43,895	
Accumulated Deferred Income Taxes		0	
Pre 1971 Unamortized Investment Tax Credit		0	
Customer Deposits		346	
Contributions in Aid of Construction		131,690	
Escrow Liability		21,307	
Other Deductions (Please Specify)		0	
Total Deductions to Rate Base		\$197,239	
Rate Base			
		-\$5,915	
Adjusted Net Operating Income			
Operating Revenues:			
Residential		\$26,787	
Commercial		0	
Industrial		0	
Public Authorities		0	
Multiple Family		0	
Fire Protection		0	
All Other		0	
Total Operating Revenues		\$26,787	
Operating Expenses:			
Operation		\$17,601	
Depreciation		0	
Amortization		0	
Taxes Other Than Income Taxes		1,333	
Income Taxes		0	
Total Operating Expense		\$18,934	
Net Operating Income			
		\$7,853	
Other (Please Specify)		0	
Other (Please Specify)		0	
Adjusted Net Operating Income		\$7,853	
Rate of Return (Line 49 / Line 25)			
		-132.76%	
All amounts should be calculated in a manner consistent with the last Rate Order issued by the Commission for this Company.			

Cumberland Basin Wastewater System
Activity Report for Escrow Account
For the Twelve Months Ended December 31, 2020

SU-2

Escrow Liability Required Per Books (Account 235.1)					Escrow Assets Provided Per Bank (Account 132.10)			
Month	Beginning Balance	Accrued Into Escrow	Removed From Escrow	Ending Balance	Beginning Balance	Deposited Into Escrow	Removed From Escrow	Ending Balance
January	\$15,731.27	\$468.41	\$0.00	\$16,199.68	\$11,073.36	\$0.00	\$0.00	\$11,073.36
February	16,199.68	\$468.41	0.00	16,668.09	11,073.36	0.00	0.00	11,073.36
March	16,668.09	\$468.41	0.00	17,136.50	11,073.36	4,657.91	0.00	15,731.27
April	17,136.50	\$468.41	0.00	17,604.91	15,731.27	0.00	0.00	15,731.27
May	17,604.91	\$468.41	0.00	18,073.32	15,731.27	0.00	0.00	15,731.27
June	18,073.32	\$468.41	0.00	18,541.73	15,731.27	0.00	0.00	15,731.27
July	18,541.73	\$468.41	0.00	19,010.14	15,731.27	0.00	0.00	15,731.27
August	19,010.14	\$468.41	0.00	19,478.55	15,731.27	0.00	0.00	15,731.27
September	19,478.55	\$468.41	0.00	19,946.96	15,731.27	0.00	0.00	15,731.27
October	19,946.96	\$453.47	0.00	20,400.43	15,731.27	0.00	0.00	15,731.27
November	20,400.43	\$453.47	0.00	20,853.90	15,731.27	0.00	0.00	15,731.27
December	20,853.90	\$453.47	0.00	21,307.37	15,731.27	7.37	0.00	15,738.64
Total		\$5,576.10	\$0.00			\$4,665.28	\$0.00	

Total Balance at End of Fiscal Year:

Escrow Assets	\$15,738.64
Escrow Liability	21,307.37
Net Escrow Assets (Shortfall)	<u>-5,568.73</u>

STATE OF TENNESSEE

COUNTY OF **Putnam**

We the undersigned Tim Huddleston
and _____
of Cumberland Basin Wastewater System, LLC

on our oath do severally say that the foregoing return has been prepared,
under our direction, from the original books, papers and records of said
utility; that we have carefully examined the same, and declare the same to be
a correct statement of the business and affairs of said utility for the period
covered by the return in respect to each and every matter and thing therein
set forth, to the best of our knowledge, information and belief.

.....
(Chief Officer)

.....
(Officer in charge of accounts)

Subscribed and sworn to before me this.....
day of....., 20.....

.....
Notary Public,County,

My commission will expire.....

.....
(Seal)

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Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020		
INCOME STATEMENT					
Account Name (a)	Ref Page (b)	Water (c)	Sewer (d)	Other (e)	Total (f)
Gross Revenue:					
Residential			\$26,581		\$26,581
Commercial			0		0
Industrial			0		0
Multi-Family			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Gross Revenue			\$26,581		\$26,581
Operation & Maint. Expense	W3/S3		\$21,279		\$21,279
Depreciation Expense	F-5		0		0
Amortization Expense			0		0
Other Expense (Please Specify)			0		0
Other Expense (Please Specify)			0		0
Taxes Other Than Income	F-7		1,245		1,245
Income Taxes	F-7		0		0
Total Operating Expenses			\$22,524		\$22,524
Net Operating Income			\$4,057		\$4,057
Other Income:					
Nonutility Income			\$0		\$0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Other Income			\$0		\$0
Other Deductions:					
Misc. Nonutility Expenses			\$0		\$0
Other - Interest Expense			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Other (Please Specify)			0		0
Total Other Deductions			\$0		\$0
Net Income			\$4,057		\$4,057

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
COMPARATIVE BALANCE SHEET			
Account Name (a)	Ref Page (b)	Current Year (c)	Previous Year (d)
ASSETS			
Utility Plant in Service (101-105)	F5/W1/S1	\$175,585	\$175,585
Accum. Depreciation and Amortization (108)	F5/W2/S2	35,116	26,337
Net Utility Plant		\$140,469	\$149,248
Cash		\$57,454	\$51,135
Customer Accounts Receivable (141)		0	0
Customer Deposits (132.05)		0	0
Escrow Deposits (132.10)		11,073	7,697
Other Assets (Please Specify)		0	0
Other Assets (Please Specify)		0	0
Total Assets		\$208,997	\$208,080
LIABILITIES AND CAPITAL			
Common Stock Issued (201)	F-6	\$0	\$0
Preferred Stock Issued (204)	F-6	0	0
Other Paid-In Capital (211)		0	0
Retained Earnings (215)	F-6	32,450	28,393
Capital (Proprietary & Partnership-218)	F-6	20,000	20,000
Total Capital		\$52,450	\$48,393
Long-Term Debt (224)	F-6	\$0	\$0
Accounts Payable (231)		0	0
Notes Payable (232)		0	0
Customer Deposits (235)		346	346
Accrued Taxes (236)		0	0
Advances Payable		0	0
Escrowed Deposits (235.1)		15,731	10,093
Other Liabilities (Please Specify)		0	0
Other Liabilities (Please Specify)		0	0
Other Liabilities (Please Specify)		0	0
Advances for Construction		0	0
Contributions In Aid Of Const.-Net (271-2)	F-8	140,469	149,248
Total Liabilities		\$156,547	\$159,687
Total Liabilities & Capital		\$208,997	\$208,080

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
NET UTILITY PLANT			
Plant Accounts (101-107) Inclusive (a)	Water (c)	Sewer (d)	Other (e)
			Total (f)
Utility Plant in Service (101)		\$175,585	\$175,585
Construction Work in Progress (105)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Other (Please Specify)		0	0
Total Utility Plant		\$175,585	\$175,585
ACCUMULATED DEPRECIATION AND AMORTIZATION OF UTILITY PLANT			
Account 108 (a)	Water (c)	Sewer (d)	Other (e)
			Total (f)
Balance First of Year		\$26,337	\$26,337
Credits During Year:			
Accruals charged to Depr. Account		\$8,779	\$8,779
Salvage		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Other Credits (Please Specify):		0	0
Total Credits		\$8,779	\$8,779
Debits During Year:			
Book/Historical Cost of Plant Retired		\$0	\$0
Cost of Removal		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Other Debits (Please Specify):		0	0
Total Debits		\$0	\$0
Balance End of Year		\$35,116	\$35,116

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
CAPITAL STOCK (201 - 204)			
(a)	Common Stock (b)	Preferred Stock (c)	
Par or stated value per share	N/A	N/A	
Shares Authorized	N/A	N/A	
Shares issued and outstanding	N/A	N/A	
Total par value of stock issued	0	0	
Dividends declared per share for year	0	0	
RETAINED EARNINGS (215)			
(a)	Appropriated (b)	Unappropriated (c)	
Balance first of year	0	28,393	
Changes during year NET INCOME/(NET LOSS)	0	4,057	
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Changes during year (Please Specify)			
Balance end of year	0	32,450	
PROPRIETARY CAPITAL (218)			
(a)	Proprietor (b)	Partner (c)	
Balance first of year	\$20,000		
Deposits from Owners	0		
Net Income	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Changes during year (Please Specify)	0		
Balance end of year	\$20,000		
LONG-TERM DEBT (224)			
(a)	Interest Rate (b)	Year End Balance (c)	
N/A	0.00%	\$0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
N/A	0.00%	0	
Total Long-Term Debt		\$0	

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
CONTRIBUTIONS IN AID OF CONSTRUCTION (271)			
Description (a)	Water (b)	Sewer (c)	Total (d)
Balance First of Year		\$149,248	\$149,248
Add Credits During Year			0
Less Charges During Year		8,779	8,779
Balance End of Year		\$140,469	\$140,469
Less Accumulated Amortization		0	0
Net Contributions in Aid of Construction		\$140,469	\$140,469
ADDITIONS TO CONTRIBUTIONS IN AID OF CONSTRUCTION DURING YEAR (CREDITS)			
Report below all developers or contractors agreements from which cash or property was received during the year (a)	Indicate "Cash" or "Property" (b)	Water (c)	Sewer (d)
Contractor or Developer #1			\$0
Contractor or Developer #2			0
Contractor or Developer #3			0
Contractor or Developer #4			0
Contractor or Developer #5			0
Contractor or Developer #6			0
Contractor or Developer #7			0
Contractor or Developer #8			0
Contractor or Developer #9			0
Contractor or Developer #10			0
Contractor or Developer #11			0
Contractor or Developer #12			0
Contractor or Developer #13			0
Contractor or Developer #14			0
Contractor or Developer #15			0
Contractor or Developer #16			0
Contractor or Developer #17			0
Contractor or Developer #18			0
Contractor or Developer #19			0
Contractor or Developer #20			0
Contractor or Developer #21			0
Contractor or Developer #22			0
Contractor or Developer #23			0
Contractor or Developer #24			0
Contractor or Developer #25			0
Contractor or Developer #26			0
Contractor or Developer #27			0
Contractor or Developer #28			0
Contractor or Developer #29			0
Contractor or Developer #30			0
Total Credits During Year			\$0

Name of Respondent Cumberland Basin Wastewater System		This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission		Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
SEWER UTILITY PLANT ACCOUNTS					
Acct No. (a)	Account Name (b)	Previous Year (c)	Additions (d)	Retirements (e)	Current Year (f)
351	Organization	\$0	\$0	\$0	\$0
352	Franchises	0	0	0	0
353	Land & Land Rights	0	0	0	0
354	Structures & Improvements	0	0	0	0
360	Collection Sewers - Force	0	0	0	0
361	Collection Sewers - Gravity	0	0	0	0
362	Special Collecting Structures	0	0	0	0
363	Services to Customers	0	0	0	0
364	Flow Measuring Devices	0	0	0	0
365	Flow Measuring Installations	0	0	0	0
370	Receiving Wells	0	0	0	0
371	Pumping Equipment	0	0	0	0
380	Treatment & Disposal Equipment	175,585	0	0	175,585
381	Plant Sewers	0	0	0	0
382	Outfall Sewer Lines	0	0	0	0
389	Other Plant & Miscellaneous Equipment	0	0	0	0
390	Office Furniture & Equipment	0	0	0	0
391	Transportation Equipment	0	0	0	0
392	Stores Equipment	0	0	0	0
393	Tools, Shop & Garage Equipment	0	0	0	0
394	Laboratory Equipment	0	0	0	0
395	Power Operated Equipment	0	0	0	0
396	Communication Equipment	0	0	0	0
397	Miscellaneous Equipment	0	0	0	0
398	Other Tangible Plant	0	0	0	0
	Total Sewer Plant	\$175,585	\$0	\$0	\$175,585

Name of Respondent Cumberland Basin Wastewater System					This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission		Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
ANALYSIS OF ACCUMULATED DEPRECIATION BY PRIMARY ACCOUNT - SEWER								
Account Number (a)	Account (b)	Average Service Life in Years (c)	Average Salvage Value in Percent (d)	Depreciation Rate Applied* (e)	Accumulated Depreciation Balance Previous Year (f)	Debits (g)	Credits (h)	Accumulated Depreciation Balance End of Year (i)
354	Structures & Improvements	0	0.00%	0.00%	\$0	\$0	\$0	\$0
360	Collection Sewers - Force	0	0.00%	0.00%	0	0	0	0
361	Collection Sewers - Gravity	0	0.00%	0.00%	0	0	0	0
362	Special Collecting Structures	0	0.00%	0.00%	0	0	0	0
363	Services to Customers	0	0.00%	0.00%	0	0	0	0
364	Flow Measuring Devices	0	0.00%	0.00%	0	0	0	0
365	Flow Measuring Installations	0	0.00%	0.00%	0	0	0	0
370	Receiving Wells	0	0.00%	0.00%	0	0	0	0
371	Pumping Equipment	0	0.00%	0.00%	0	0	0	0
380	Treatment & Disposal Equipment	20	0.00%	0.00%	26,337	0	8,779	35,116
381	Plant Sewers	0	0.00%	0.00%	0	0	0	0
382	Outfall Sewer Lines	0	0.00%	0.00%	0	0	0	0
389	Other Plant & Miscellaneous Equipment	0	0.00%	0.00%	0	0	0	0
390	Office Furniture & Equipment	0	0.00%	0.00%	0	0	0	0
391	Transportation Equipment	0	0.00%	0.00%	0	0	0	0
392	Stores Equipment	0	0.00%	0.00%	0	0	0	0
393	Tools, Shop & Garage Equipment	0	0.00%	0.00%	0	0	0	0
394	Laboratory Equipment	0	0.00%	0.00%	0	0	0	0
395	Power Operated Equipment	0	0.00%	0.00%	0	0	0	0
396	Communication Equipment	0	0.00%	0.00%	0	0	0	0
397	Miscellaneous Equipment	0	0.00%	0.00%	0	0	0	0
398	Other Tangible Plant	0	0.00%	0.00%	0	0	0	0
	Totals				\$26,337	\$0	\$8,779	\$35,116
*State basis used for percentages used in schedule.								

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
SEWER OPERATION & MAINTENANCE EXPENSE			
Acct No.	Description (a)	Amount (b)	
701	Salaries & Wages - Employees	\$0	
703	Salaries & Wages - Officers, Directors & Stockholders	0	
704	Employee Pensions & Benefits	0	
710	Purchased Sewage Treatment	0	
711	Sludge Removal Expense	0	
715	Purchased Power	1,198	
716	Fuel for Power Production	0	
718	Chemicals	0	
720	Materials & Supplies	0	
730	Contractual Services	17,077	
740	Rents	0	
750	Transportation Expense	0	
755	Insurance Expense	0	
765	Regulatory Commission Expense	120	
770	Bad Debt Expense	0	
775	Miscellaneous Expenses	2,883	
	Total Sewer Operation & Maintenance Expense	\$21,279	

SEWER CUSTOMERS				
Description (a)	Customers First of Year (b)	Additions (c)	Disconnections (d)	Customers End of Year (e)
Metered Customers:				
5/8 Inch	33	2	0	35
3/4 Inch	0	0	0	0
1.0 Inch	0	0	0	0
1.5 Inch	0	0	0	0
2.0 Inch	0	0	0	0
2.5 Inch	0	0	0	0
3.0 Inch	0	0	0	0
4.0 Inch	0	0	0	0
6.0 Inch	0	0	0	0
8.0 Inch	0	0	0	0
Other (Please Specify)	0	0	0	0
Other (Please Specify)	0	0	0	0
Other (Please Specify)	0	0	0	0
Unmetered Customers	0	0	0	0
Total Customers	33	2	0	35

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission		Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
PUMPING EQUIPMENT				
Description*** (a)	Lift Station The Bluffs (b)	Lift Station Genesis (c)	Lift Station #3 (d)	Lift Station #4 (e)
Make, Model, or Type of Pump	N/A	Gould		
Year Installed		2017		
Rated Capacity (GPM)		75 GPM		
Size (HP)		1/2 HP		
Power (Electric/Mechanical)		1 PH/220 V		
Make, Model or Type of Motor		N/A		
SERVICE CONNECTIONS				
Description*** (a)	Service Connection The Bluffs (b)	Service Connection Genesis (c)	Service Connection #3 (d)	Service Connection #4 (e)
Size (Inches)	1"	4"		
Type (PVC, VCP, etc)	PVC	PVC		
Average Length (Feet)	40 LF	70 LF		
Connections-Beginning of Year	4	29	0	0
Connections-Added during Year	1	1	0	0
Connection-Retired during Year	0	0	0	0
Connections-End of Year	5	30	0	0
Number of Inactive Connections	0	0	0	0
COLLECTING MAINS, FORCE MAINS, & MANHOLES				
Description (a)	Collecting Mains (b)	Force Mains (c)	Manholes (d)	
Size (Inches)	2-3", 8"	4"	N/A	
Type	PVC	PVC	N/A	
Length/Number-Beginning of Year	18,700 LF	0	0	
Length/Number-Added During Year	2,810 LF	580 LF	0	
Length/Number-Retired During Year	0 LF	0	0	
Length/Number-End of Year	21,510 LF	580 LF	0	

***If more space is needed to list equipment please attach additional sheets as necessary.

Name of Respondent Cumberland Basin Wastewater System	This Report is: (1) <u>X</u> An Original (2) <u> </u> A Resubmission	Date of Report (Mo, Da, Yr) 3-31-2021	Year of Report 2020
TREATMENT PLANT			
Description*** (a)	Treatment Facility The Bluffs (b)	Treatment Facility Genesis (c)	Treatment Facility #3 (d)
	Treatment Facility #4 (e)		
Manufacturer	Orenco	Aquapoint	
Type	Bio Contact	Bio Contact	
Steel or Concrete	FRP	FRP	
Total Capacity	43,750 GPD	30,000 GPD	
Average Daily Flow	280 GPD	4,100 GPD	
Effluent Disposal	280 GPD	4,100 GPD	
Total Gallons of Sewage Treated	280 GPD	4,100 GPD	
MASTER LIFT STATION PUMPS			
Description*** (a)	Master Pump The Bluffs (b)	Master Pump Genesis (c)	Master Pump #3 (d)
	Master Pump #4 (e)		
Manufacturer	Orenco	Starite	
Capacity (GPM)	75 GPM	50 GPM	
Size (HP)	1.0 HP	1.5 HP	
Power (Electric/Mechanical)	1 PH/220 V	230 V	
Make, Model, or Type of Motor	Franklin	N/A	
OTHER SEWER SYSTEM INFORMATION			
Present Number of Equivalent Residential Customer's * being served	35		
Maximum Number of Equivalent Residential Customer's * that the system can efficiently serve	273		
Estimated Annual Increase in Equivalent Residential Customers *	10		
* Equivalent Residential Customers = (Total Gallons Treated / 365 Days) / 275 Gallons Per Day. Total Gallons Treated includes both sewage treated and purchased sewage treatment.			
State any plans and estimated completion dates for any enlargements of this system: <u>N/A</u>			
If the present systems do not meet environmental requirements, please submit the following: A. An evaluation of the present plant or plants in regard to meeting the requirements. B. Plans for funding and construction of the required upgrading. C. The date construction will begin. N/A			
What is the percent of the certificated area that have service connections installed? <u>All (100%) of the certificated area of CBWS have service connections in place.</u>			

***If more space is needed to list equipment please attach additional sheets as necessary.

Name of Respondent	This Report is:	Date of Report	Year of Report
Cumberland Basin Wastewater System	(1) <u>X</u> An Original (2) <u> </u> A Resubmission	(Mo, Da, Yr) 3-31-2021	2020
SUPPLEMENTAL FINANCIAL DATA TO THE ANNUAL REPORT			
Rate Base			
Additions:			
Plant In Service		\$175,585	
Construction Work in Progress		0	
Property Held For Future Use		0	
Materials & Supplies		0	
Working Capital Allowance		0	
Escrow Deposits		11,073	
Other Additions (Please Specify)		0	
Total Additions to Rate Base		\$186,658	
Deductions:			
Accumulated Depreciation		\$35,116	
Accumulated Deferred Income Taxes		0	
Pre 1971 Unamortized Investment Tax Credit		0	
Customer Deposits		346	
Contributions in Aid of Construction		140,469	
Escrow Liability		15,731	
Other Deductions (Please Specify)		0	
Total Deductions to Rate Base		\$191,663	
Rate Base		-\$5,004	
Adjusted Net Operating Income			
Operating Revenues:			
Residential		\$26,581	
Commercial		0	
Industrial		0	
Public Authorities		0	
Multiple Family		0	
Fire Protection		0	
All Other		0	
Total Operating Revenues		\$26,581	
Operating Expenses:			
Operation		\$21,279	
Depreciation		0	
Amortization		0	
Taxes Other Than Income Taxes		1,245	
Income Taxes		0	
Total Operating Expense		\$22,524	
Net Operating Income		\$4,057	
Other (Please Specify)		0	
Other (Please Specify)		0	
Adjusted Net Operating Income		\$4,057	
Rate of Return (Line 49 / Line 25)		-81.07%	
All amounts should be calculated in a manner consistent with the last Rate Order issued by the Commission for this Company.			

Cumberland Basin Wastewater System
Activity Report for Escrow Account
For the Twelve Months Ended December 31, 2020

SU-2

Escrow Liability Required Per Books (Account 235.1)					Escrow Assets Provided Per Bank (Account 132.10)			
Month	Beginning Balance	Accrued Into Escrow	Removed From Escrow	Ending Balance	Beginning Balance	Deposited Into Escrow	Removed From Escrow	Ending Balance
January	\$10,092.77	\$461.38	\$0.00	\$10,554.15	\$7,696.83	\$3,370.26	\$0.00	\$11,067.09
February	10,554.15	\$461.38	0.00	11,015.53	11,067.09	0.00	0.00	11,067.09
March	11,015.53	\$461.38	0.00	11,476.91	11,067.09	0.00	0.00	11,067.09
April	11,476.91	\$461.38	0.00	11,938.29	11,067.09	0.00	0.00	11,067.09
May	11,938.29	\$461.38	0.00	12,399.67	11,067.09	0.00	0.00	11,067.09
June	12,399.67	\$461.38	0.00	12,861.05	11,067.09	0.00	0.00	11,067.09
July	12,861.05	\$468.41	0.00	13,329.46	11,067.09	0.00	0.00	11,067.09
August	13,329.46	\$468.41	0.00	13,797.87	11,067.09	0.00	0.00	11,067.09
September	13,797.87	\$483.35	0.00	14,281.22	11,067.09	0.00	0.00	11,067.09
October	14,281.22	\$483.35	0.00	14,764.57	11,067.09	0.00	0.00	11,067.09
November	14,764.57	\$483.35	0.00	15,247.92	11,067.09	0.00	0.00	11,067.09
December	15,247.92	\$483.35	0.00	15,731.27	11,067.09	6.27	0.00	11,073.36
Total		\$5,638.50	\$0.00			\$3,376.53	\$0.00	

Total Balance at End of Fiscal Year:

Escrow Assets	\$11,073.36
Escrow Liability	15,731.27
Net Escrow Assets (Shortfall)	<u>- \$4,657.91</u>

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
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Shilina.Brown@ag.tn.gov

This the 9th day of February 2024.



Katherine Barnes