

FARRIS BOBANGO PLC

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August 7, 2023

Mason C. Rush
Assistant Attorney General
Consumer Advocate Division
Office of the Tennessee Attorney General
500 Dr. Martin L. King Jr. Blvd.
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on August 7, 2023 at 1:30 p.m.

Re: Tennessee Public Utility Commission, Docket 23-00051, Petition of Superior Wastewater Systems, LLC to Amend Existing Service Territory in Williamson County

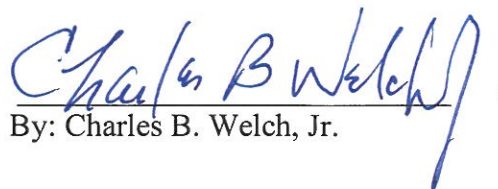
Dear Mr. Rush:

Attached, please find the responses of Superior Wastewater Systems, LLC to the Consumer Advocate's inquiry received via your letter dated July 20, 2023. We are transmitting a copy of this document to the docket clerk to include in the record.

If you have any questions or comments, please contact me.

Sincerely,

FARRIS BOBANGO PLC


By: Charles B. Welch, Jr.

Cc: John Powell

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

1. Rule 1220-04-13-.17(2)(a)4. It appears Superior may have an additional affiliate relationship identified in the Petition, Attachment 2, Exhibit 3.4 which states “John Powell is the sole member of Superior Wastewater Systems, LLC. He is also the sole member of Ashby Communities, LLC, the developer of this project.” Specifically, Exhibit 3.4 includes a contractor license for “John Powell Construction LLC” not mentioned in Exhibit 1.4. The Consumer Advocate could not locate a description that details “any transactions, direct or indirect, that occur or are expected to occur between affiliated entities” as required by TPUC's rule. Please file the missing information in this Docket as required by the rule.

Response:

Ashby Communities, LLC has a long-term agreement to use John Powell's Contractor's License via John Powell Construction, LLC if required. Mr. Powell obtained his Contractor's License to address the need for any emergency repairs and to appropriately inspect the work done by other construction firms.

Neither Ashby Communities, LLC nor John Powell Construction, LLC has placed any bid on any construction jobs for Superior Wastewater Systems, LLC. Further, John Powell Construction does not intend to do any construction work for Superior Wastewater Systems in connection with this CCN Amendment to provide wastewater service to the Triune area. Therefore, there are no anticipated transactions, direct or indirect, that are expected to occur between affiliated entities regarding this CCN Amendment.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

2. Rule 1220-04-13-.17(2)(a)7. The rule requires a complete description of the geographic territory to be served, including “the number of acres.” The statement provided in Attachment 2, Exhibit 1.7 to the Petition fails to note the acreage of the service area. Please file the missing information in this Docket as required by the rule.

Response:

The total acreage for this service territory is 5,997.24 acres split between the following construction Sections:

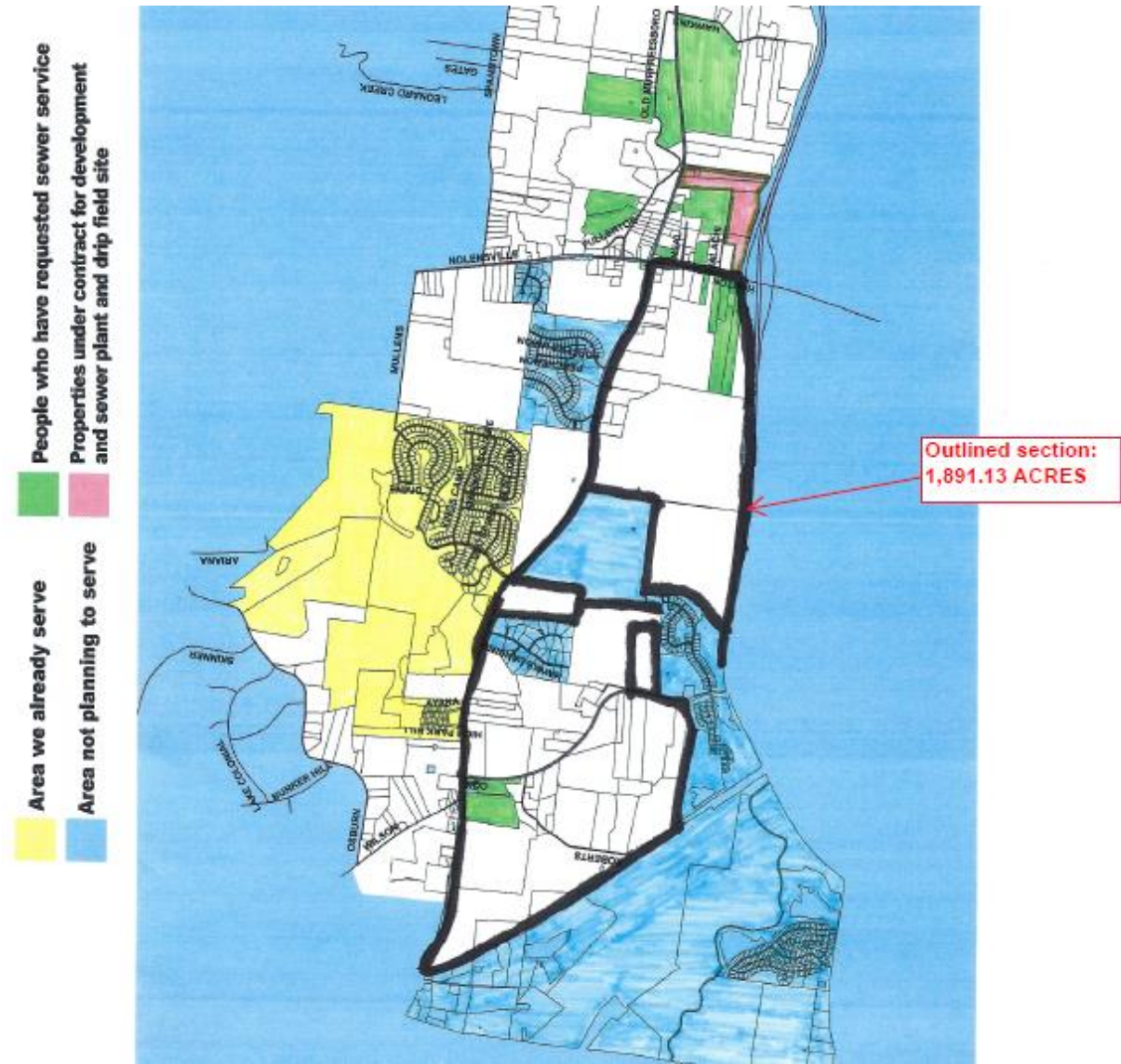
Section	Acres
Section 1	1,891.13
Section 2	781.87
Section 3	1,750.99
Section 4	1,573.25
Total	5,997.24

Please see Attachment CA1-2a for a map that segregates these Sections.

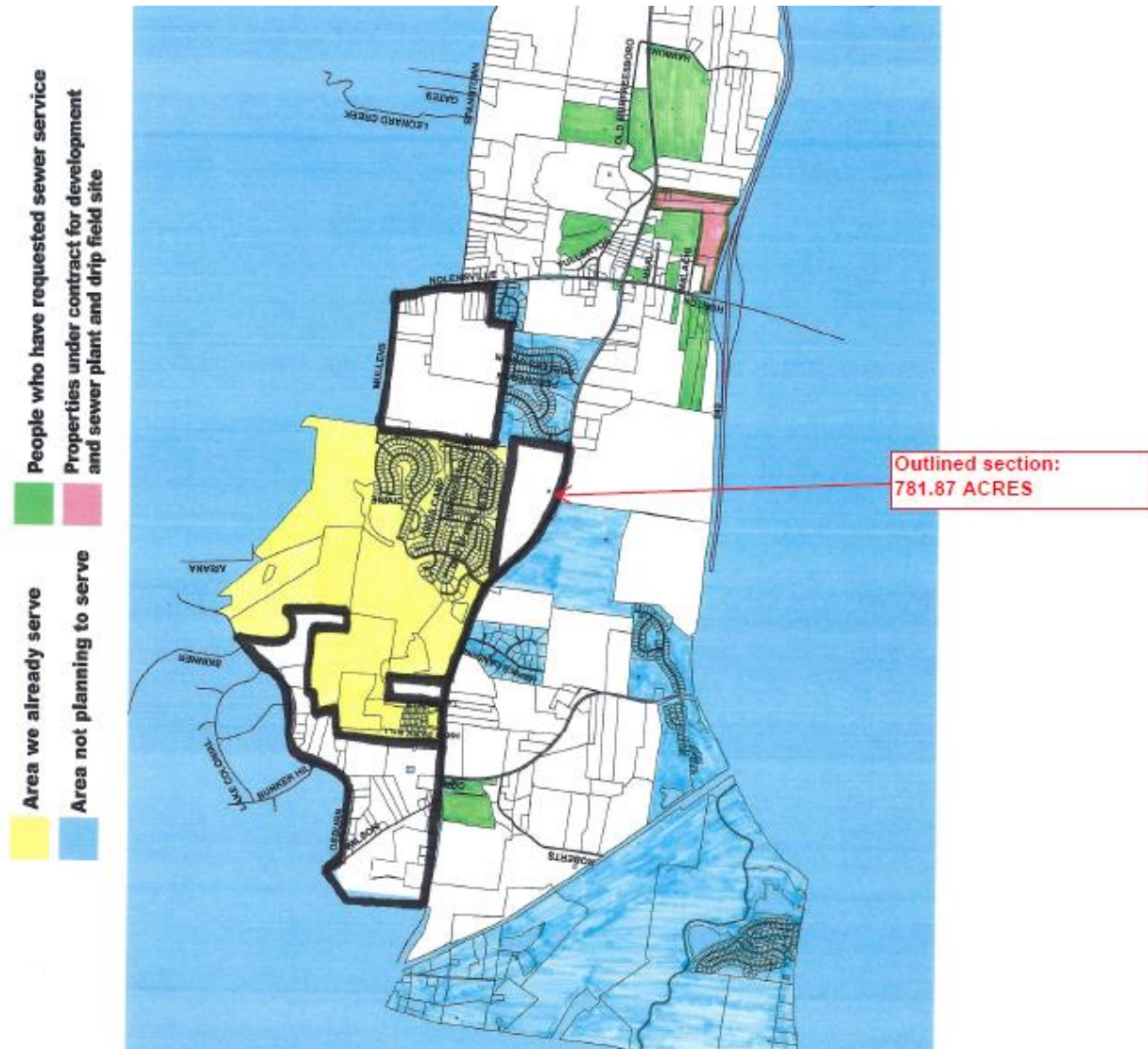
The acreage for each Section is further detailed by parcel numbers. Please see the following for a detailed listing of parcels by Section:

Section	Attachment
Section 1	Attachment CA1-2b
Section 2	Attachment CA1-2c
Section 3	Attachment CA1-2d
Section 4	Attachment CA1-2e

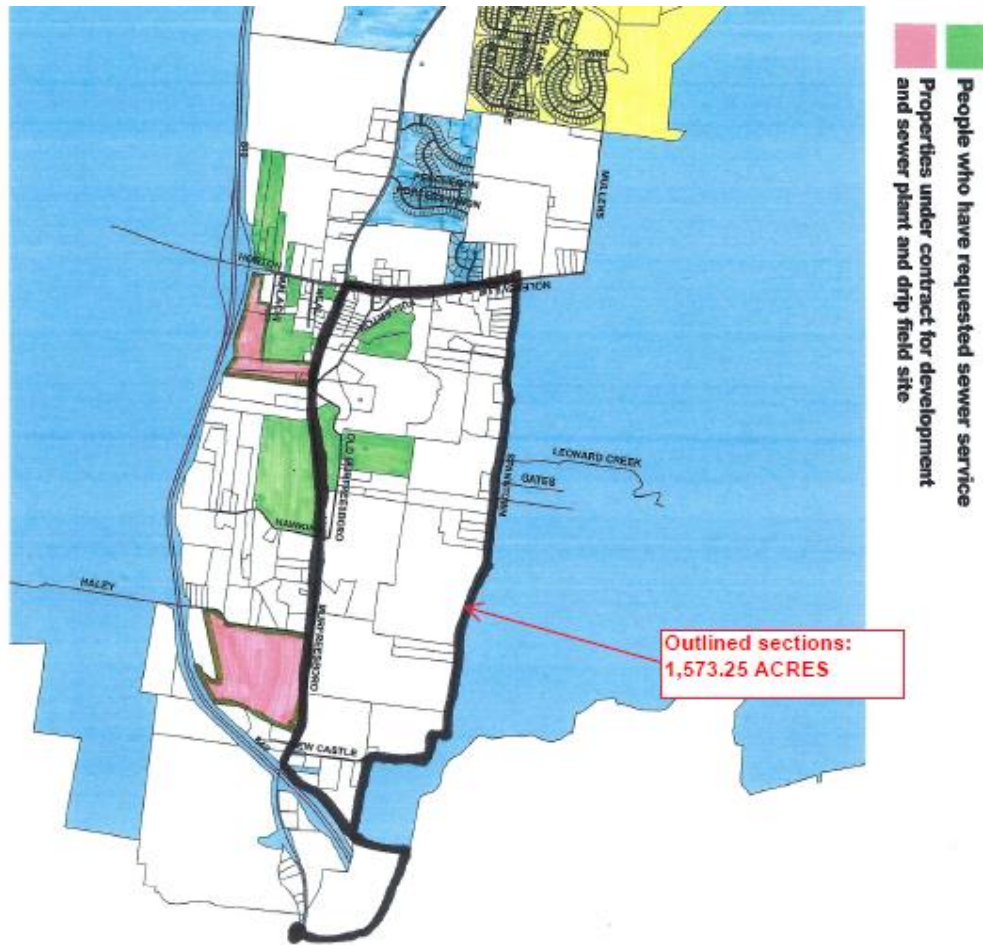
Superior Wastewater Systems, LLC
Proposed Triune Service Territory – Section 1



Superior Wastewater Systems, LLC
Proposed Triune Service Territory – Section 2



Superior Wastewater Systems, LLC
Proposed Triune Service Territory – Section 4



Superior Wastewater Systems, LLC
Proposed Triune Service Territory – Section 1 Address Detail

Item	Parcel ID	Property Address	Acreage
1	108 051.00 000	Murfreesboro Rd	128.93
2	108 052.00 000	Les Waggoner Road	42.87
3	108 053.00 000	4785 Murfreesboro Road	79.47
4	108 054.00 000	4819 Murfreesboro Road	36.65
5	108 055.00 000	4817 Murfreesboro Road	1.65
6	108 056.00 000	4833 Murfreesboro Road	0.94
7	108 057.00 000	6200 Roberts Road	4.66
8	108 058.00 000	6206 Roberts Road	6.07
9	108 059.00 000	Cox Road	1.54
10	108 060.00 000	Cox Road	5.27
11	108 062.00 000	6205 Roberts Road	3.25
12	108 063.00 000	6206 Roberts Road	6.07
13	108	6210 Roberts Road	1.43
14	115 005.02 000	6209 Roberts Road	6.85
15	115 005.01 000	6211 Roberts Road	2.30
16	114 002.00 000	6231 Cox Road	8.59
17	115 006.00 000	6219 Roberts Road	39.93
18	114 004.00 000	6245 Cox Road	40.65
19	115 006.01 000	Roberts Road	19.08
20	115 007.00 000	6231 Roberts Road	20.16
21	115 007.02 000	6245 Roberts Road	44.33
22	114 004.01 000	6251 Roberts Road	8.77
23	114 042.01 000	6309 Cox Road	26.04
24	114 042.06 000	Cox Road	39.71
25	114 042.03 000	6291 Cox Road	22.89
26	114 042.04 000	6287 Cox Road	15.95
27	114 042.05 000	6283 Cox Road	6.21
28	114 006.01 000	6275 Cox Road	2.70
29	114 006.00 000	6257 Cox Road	19.06
30	109 045.02 000	Murfreesboro Road	19.84
31	109 044.09 000	4855 Murfreesboro Road	7.59
32	109 044.10 000	Murfreesboro Road	9.54
33	109 044.06 000	Murfreesboro Road	3.74
34	109 044.07 000	4859 Murfreesboro Road	0.94
35	109 044.08 000	Murfreesboro Road	8.14
36	109 044.05 000	Murfreesboro Road	25.68
37	109 045.00 000	6220 Cox Road	41.63
38	114 007.01 000	Cox Road	16.39
39	114 007.02 000	6248 Cox Road	5.05
40	114 007.03 000	6252 Cox Road	4.94
41	114 007.00 000	6262 Cox Road	47.25
42	114 008.00 000	6266 Cox Road	13.22
43	114 008.01 000	6270 Cox Road	5.05

44	114 010.02 000	6450 Christ Church Lane	1.76
45	114 009.00 000	6274 Cox Road	3.45
46	114 010.01 000	6278 Cox Road	98.41
47	114 010.03 000	6286 Cox Road	28.44
48	109 042.00 000	4893 Murfreesboro Road	48.46
49	109 041.00 000	4895 Murfreesboro Road	1.18
50	114 038.01 000	6330 Cox Road	154.58
51	114 014.00 000	4974 Murfreesboro Road	375.28
52	114 017.06 000	4987 Murfreesboro Road	5.01
53	114 017.01 000	4991 Murfreesboro Road	9.79
54	114 017.07 000	4995 Murfreesboro Road	9.90
55	114 017.00 000	5007 Murfreesboro Road	17.38
56	114 020.00 000	8039 Horton Highway	91.93
57	114 016.00 000	5025 Murfreesboro Road	1.65
58	114 017.04 000	5021 Murfreesboro Road	7.88
59	114 019.00 000	5037 Murfreesboro Road	1.10
60	113 009.00 000	7955 Nolensville Road	98.71
61	113 065.00 000	5041 Murfreesboro Road	1.64
62	113 064.00 000	8003 Horton Highway	2.10
63	113 064.01 000	Horton Highway	0.24
64	113 067.01 000	8013 Horton Highway	3.14
65	113 067.00 000	8021 Horton Highway	7.33
66	113 068.00 000	8029 Horton Highway	6.20
67	113 069.00 000	8035 Horton Highway	3.25
68	114 021.00 000	8049 Horton Highway	7.31
69	113 070.00 000	8053 Horton Highway	6.31
70	114 022.00 000	Horton Highway	22.73
71	114 022.01 000	Horton Highway	15.19
72	114 024.00 000	Horton Highway	15.83
		Total	1,891.13

Superior Wastewater Systems, LLC
Proposed Triune Service Territory – Section 2 Address Detail

Item	Parcel ID	Parcel Address	Acreage
1	108 051.00 000	4812 Murfreesboro Road, Arrington, TN 37014-9164	1.64
2	108 052.00 000	5081 Wilson Pike, Arrington, TN 37014-9122	0.32
3	108 053.00 000	5077 Wilson Pike, Arrington, TN 37014-9122	0.28
4	108 054.00 000	5073 Wilson Pike, Arrington, TN 37014-9122	1.06
5	108 055.00 000	5067 Wilson Pike, Arrington, TN 37014-9122	1.53
6	108 056.00 000	4810 Murfreesboro Road, Arrington, TN 37014-9164	4.07
7	108 057.00 000	5063 Wilson Pike, Arrington, TN 37014-9122	0.40
8	108 058.00 000	5059 Wilson Pike, Arrington, TN 37014-9122	0.48
9	108 059.00 000	5055 Wilson Pike, Arrington, TN 37014-9122	1.28
10	108 060.00 000	5051 Wilson Pike, Arrington, TN 37014-9122	0.47
11	108 062.00 000	5043 Wilson Pike, Arrington, TN 37014-9122	5.20
12	108 063.00 000	5039 Wilson Pike, Arrington, TN 37014-9122	1.52
13	108 064.00 000	5035 Wilson Pike, Arrington, TN 37014-9122	1.61
14	108 065.00 000	5031 Wilson Pike, Arrington, TN 37014-9122	2.09
15	108 066.00 000	5027 Wilson Pike, Arrington, TN 37014-9122	1.76
16	108 067.00 000	5023 Wilson Pike, Arrington, TN 37014-9122	1.44
17	108 068.00 000	5019 Wilson Pike, Arrington, TN 37014-9122	2.67
18	108 069.00 000	5015 Wilson Pike, Arrington, TN 37014-9122	2.26
19	108 070.00 000	5011 Wilson Pike, Arrington, TN 37014-9122	4.42
20	108 072.00 000	5007 Wilson Pike, Arrington, TN 37014-9122	8.02
21	108 073.01 000	4099 Wilson Pike, Franklin, TN 37067-8137	2.41
22	108 082.00 000	2121 Osburn Road, Arrington, TN 37014-9752	3.02
23	108 083.00 000	2117 Osburn Road, Arrington, TN 37014-9752	7.33
24	108 084.00 000	2109 Osburn Road, Arrington, TN 37014-9752	1.37
25	108 084.01 000	2111 Osburn Road, Arrington, TN 37014-9752	3.00
26	108 085.00 000	2101 Osburn Road, Arrington, TN 37014-9752	3.74
27	108 086.00 000	5018 Wilson Pike, Arrington, TN 37014-9121	8.42
28	108 088.00 000	5044 Wilson Pike, Arrington, TN 37014-9121	13.21
29	108 088.01 000	5040 Wilson Pike, Arrington, TN 37014-9121	3.08
30	108 088.02 000	5042 Wilson Pike, Arrington, TN 37014-9121	0.96
31	108 089.00 000	5052 Wilson Pike, Arrington, TN 37014-9121	7.23
32	108 090.00 000	5056 Wilson Pike, Arrington, TN 37014-9121	7.44
33	108 093.00 000	5074 Wilson Pike, Arrington, TN 37014-9121	0.45
34	108 093.02 000	5060 Wilson Pike, Arrington, TN 37014-9121	1.07

35	108 094.00 000	5082 Wilson Pike, Arrington, TN 37014-9121	0.92
36	108 094.01 000	5078 Wilson Pike, Arrington, TN 37014-9121	1.05
37	108 095.00 000	5086 Wilson Pike, Arrington, TN 37014-9121	0.72
38	109 003.00 000	2175 Osburn Road, Arrington, TN 37014-9752	1.99
39	109 004.01 000	2169 Osburn Road, Arrington, TN 37014-9752	10.44
40	109 004.02 000	Osburn Road, Arrington, TN 37014	10.71
41	109 004.03 000	2181 Osburn Road, Arrington, TN 37014	56.75
42	109 019.00 000	9579 Mullens Road, Arrington, TN 37014-9732	22.71
43	109 020.00 000	9575 Mullens Road, Arrington, TN 37014-9732	5.31
44	109 021.00 000	9557 Mullens Road, Arrington, TN 37014-9732	147.16
45	109 021.01 000	9551 Mullens Road, Arrington, TN 37014	5.13
46	109 021.02 000	Mullens Road, TN	0.95
47	109 024.00 000	2163 Osburn Road, Arrington, TN 37014-9752	3.34
48	109 025.00 000	2157 Osburn Road, Arrington, TN 37014-9752	1.66
49	109 025.01 000	2159 Osburn Road, Arrington, TN 37014-9752	3.42
50	109 026.00 000	2155 Osburn Road, Arrington, TN 37014-9752	2.95
51	109 027.00 000	2151 Osburn Road, Arrington, TN 37014-9752	9.23
52	109 028.00 000	2147 Osburn Road, Arrington, TN 37014-9752	11.01
53	109 029.00 000	2141 Osburn Road, Arrington, TN 37014-9752	13.82
54	109 029.01 000	2137 Osburn Road, Arrington, TN 37014-9752	3.44
55	109 030.00 000	2135 Osburn Road, Arrington, TN 37014-9752	2.62
56	109 031.00 000	2131 Osburn Road, Arrington, TN 37014-9752	30.12
57	109 032.00 000	2125 Osburn Road, Arrington, TN 37014-9752	5.76
58	109 033.00 000	4832 Murfreesboro Road, Arrington, TN 37014-9167	41.32
59	109 034.00 000	4830 Murfreesboro Road, Arrington, TN 37014-9167	0.89
60	109 035.00 000	4820 Murfreesboro Road, Arrington, TN 37014-9167	5.92
61	109 036.00 000	Murfreesboro Road, TN	0.26
62	109 037.00 000	Murfreesboro Road, TN	6.90
63	109 039.00 000	4866 Murfreesboro Road, Arrington, TN 37014-9167	26.91
64	110 026.00 000	7839 Nolensville Road, Arrington, TN 37014-9142	4.99
65	110 026.01 000	7841 Nolensville Road, Arrington, TN 37014-9142	2.85
66	110 027.00 000	7843 Nolensville Road, Arrington, TN 37014-9142	2.78
67	110 031.00 000	7883 Nolensville Road, Arrington, TN 37014-9142	101.36
68	110 032.00 000	7891 Nolensville Road, Arrington, TN 37014-9143	4.88
69	110 033.00 000	7893 Nolensville Road, Arrington, TN 37014-9143	4.58
70	110 034.00 000	Nolensville Road, TN	4.95
71	110 035.00 000	7899 Nolensville Road, Arrington, TN 37014-9143	4.89
72	113 002.01 000	2984 Old Murfreesboro Road, Arrington, TN 37014-8901	1.46
73	113 003.00 000	7939 Nolensville Road, Arrington, TN 37014-9143	2.82
74	113 004.00 000	7943 Nolensville Road, Arrington, TN 37014-9143	2.16
75	113 005.00 000	2988 Old Murfreesboro Road, Arrington, TN 37014-8901	2.15

76	113 006.00 000	7947 Nolensville Road, Arrington, TN 37014-9143	2.03
77	113 007.00 000	2996 Old Murfreesboro Road, Arrington, TN 37014-8901	0.81
78	113 008.00 000	2992 Old Murfreesboro Road, Arrington, TN 37014-8901	0.78
79	113 009.00 000	7955 Nolensville Road, Arrington, TN 37014-9104	98.71
80	113 010.00 000	5048 Murfreesboro Road, Arrington, TN 37014-9169	1.01
		Total:	781.87

Superior Wastewater Systems, LLC
Proposed Triune Service Territory – Section 3 Address Detail

Item	Parcel ID	Parcel Address	Acreage
1	109 019.00 000	9579 Mullens Road, Arrington, TN 37014-9732	22.71
2	109 020.00 000	9575 Mullens Road, Arrington, TN 37014-9732	5.31
3	109 021.00 000	9557 Mullens Road, Arrington, TN 37014-9732	147.16
4	109 021.01 000	9551 Mullens Road, Arrington, TN 37014	5.13
5	109 021.02 000	Mullens Road, TN	0.95
6	110 026.00 000	7839 Nolensville Road, Arrington, TN 37014-9142	4.99
7	110 026.01 000	7841 Nolensville Road, Arrington, TN 37014-9142	2.85
8	110 027.00 000	7843 Nolensville Road, Arrington, TN 37014-9142	2.78
9	110 031.00 000	7883 Nolensville Road, Arrington, TN 37014-9142	101.36
10	110 032.00 000	7891 Nolensville Road, Arrington, TN 37014-9143	4.88
11	110 033.00 000	7893 Nolensville Road, Arrington, TN 37014-9143	4.58
12	110 034.00 000	Nolensville Road, TN	4.95
13	110 035.00 000	7899 Nolensville Road, Arrington, TN 37014-9143	4.89
14	112 004.00 000	Murfreesboro Road, TN	365.59
15	113 002.01 000	2984 Old Murfreesboro Road, Arrington, TN 37014-8901	1.46
16	113 003.00 000	7939 Nolensville Road, Arrington, TN 37014-9143	2.82
17	113 004.00 000	7943 Nolensville Road, Arrington, TN 37014-9143	2.16
18	113 005.00 000	2988 Old Murfreesboro Road, Arrington, TN 37014-8901	2.15
19	113 006.00 000	7947 Nolensville Road, Arrington, TN 37014-9143	2.03
20	113 007.00 000	2996 Old Murfreesboro Road, Arrington, TN 37014-8901	0.81
21	113 008.00 000	2992 Old Murfreesboro Road, Arrington, TN 37014-8901	0.78
22	113 009.00 000	7955 Nolensville Road, Arrington, TN 37014-9104	98.71
23	113 054.00 000	5319 Murfreesboro Road, College Grove, TN 37046-9178	8.58
24	113 054.02 000	5311 Murfreesboro Road, College Grove, TN 37046-9178	4.85
25	113 054.04 000	Murfreesboro Road, TN	41.22
26	113 054.05 000	Murfreesboro Road, TN	2.03
27	113 054.06 000	5315 Murfreesboro Road, College Grove, TN 37046-9178	8.68
28	113 055.00 000	5245 Murfreesboro Road, College Grove, TN 37046-9177	15.30
29	113 055.02 000	5279 Murfreesboro Road, College Grove, TN 37046-9177	148.03
30	113 055.04 000	5233 Murfreesboro Road, College Grove, TN 37046-9177	5.78
31	113 055.05 000	8205 Haley Road, College Grove, TN 37046-9112	7.53
32	113 055.06 000	8221 Haley Road, College Grove, TN 37046-9112	5.32
33	113 055.07 000	8225 Haley Road, College Grove, TN 37046-9112	5.17
34	113 055.08 000	8227 Haley Road, College Grove, TN 37046-9112	15.91

35	113 055.11 000	8226 Hawkins Road, College Grove, TN 37046	25.55
36	113 055.12 000	5247 Murfreesboro Road, College Grove, TN 37046-9177	0.60
37	113 055.13 000	Murfreesboro Road, TN	0.18
38	113 055.15 000	5231 Murfreesboro Road, College Grove, TN 37046-9177	16.96
39	113 055.17 000	8238 Hawkins Road, College Grove, TN 37046-9113	14.82
40	113 055.20 000	8215 Haley Road, College Grove, TN 37046-9112	14.01
41	113 055.22 000	5237 Murfreesboro Road, College Grove, TN 37046-9177	9.20
42	113 055.23 000	Haley Lane, TN	7.87
43	113 055.25 000	8230 Hawkins Road, College Grove, TN 37046-9113	6.57
44	113 055.26 000	8228 Hawkins Road, College Grove, TN 37046	3.22
45	113 055.27 000	Haley Lane, TN	20.17
46	113 056.00 000	3097 Old Murfreesboro Road, College Grove, TN 37046-8904	137.94
47	113 057.00 000	5175 Murfreesboro Road, College Grove, TN 37046-8136	19.30
48	113 057.01 000	5147 Murfreesboro Road, College Grove, TN 37046-8136	1.52
49	113 057.06 000	Murfreesboro Road, TN	16.65
50	113 057.07 000	Murfreesboro Road, TN	26.54
51	113 057.08 000	5153 Murfreesboro Road, College Grove, TN 37046-8136	2.36
52	113 057.09 000	Murfreesboro Road, TN	11.29
53	113 057.10 000	5171 Murfreesboro Road, College Grove, TN 37046-8136	6.32
54	113 057.12 000	5157 Murfreesboro Road, College Grove, TN 37046-8136	0.97
55	113 057.14 000	Murfreesboro Road, TN	2.38
56	113 058.00 000	5141 Murfreesboro Road, College Grove, TN 37046-8136	1.88
57	113 059.00 000	5129 Murfreesboro Road, College Grove, TN 37046-8136	1.57
58	113 059.01 000	5133 Murfreesboro Road, College Grove, TN 37046-8136	1.34
59	113 059.02 000	5137 Murfreesboro Road, College Grove, TN 37046-8136	2.02
60	113 060.00 000	5125 Murfreesboro Road, College Grove, TN 37046-8136	1.14
61	113 060.01 000	5121 Murfreesboro Road, College Grove, TN 37046-8136	1.05
62	113 062.00 000	5111 Murfreesboro Road, College Grove, TN 37046-8136	4.44
63	113 062.01 000	5107 Murfreesboro Road, College Grove, TN 37046	4.27
64	113 063.01 000	8000 Horton Highway, Arrington, TN 37014	0.71
65	113 072.00 000	8064 Horton Highway, Arrington, TN 37014-9126	5.33
66	113 072.02 000	8241 Malachi Lane, Arrington, TN 37014-9100	22.14
67	113 072.03 000	Horton Highway, TN	10.36
68	113 073.00 000	8220 Malachi Lane, Arrington, TN 37014-9100	1.29
69	113 074.00 000	8040 Horton Highway, Arrington, TN 37014	2.81
70	113 074.01 000	8204 Malachi Lane, Arrington, TN 37014-9100	4.24
71	113 075.00 000	8030 Horton Highway, Arrington, TN 37014-9126	6.38
72	113 075.01 000	8210 Malachi Lane, Arrington, TN 37014	1.77
73	113 076.00 000	8219 Neal Road, Arrington, TN 37014-9112	1.05
74	113 076.01 000	Horton Highway, TN	1.70
75	113 076.03 000	8225 Neal Road, Arrington, TN 37014	3.64

76	113 077.00 000	8201 Neal Road, Arrington, TN 37014-9112	1.11
77	113 078.00 000	8226 Neal Road, Arrington, TN 37014-9111	1.07
78	113 078.01 000	8220 Neal Road, Arrington, TN 37014-9111	0.50
79	113 080.00 000	8235 Neal Road, Arrington, TN 37014-9112	4.35
80	113 081.00 000	8240 Malachi Lane, Arrington, TN 37014-9100	28.95
81	113 082.00 000	Hawkins Road, TN	15.24
82	113 082.01 000	8247 Hawkins Road, College Grove, TN 37046-9114	2.13
83	113 082.02 000	8239 Hawkins Road, College Grove, TN 37046-9114	20.25
84	113 083.00 000	8235 Hawkins Road, College Grove, TN 37046-9114	0.60
85	113 084.00 000	8257 Hawkins Road, College Grove, TN 37046-9114	24.52
86	113 084.01 000	8253 Hawkins Road, College Grove, TN 37046-9114	3.30
87	113 084.02 000	8265 Hawkins Road, College Grove, TN 37046-9114	8.75
88	113 085.00 000	8261 Hawkins Road, College Grove, TN 37046-9114	14.94
89	113 086.00 000	8267 Hawkins Road, College Grove, TN 37046	21.74
90	113 087.00 000	8260 Hawkins Road, College Grove, TN 37046-9113	32.57
91	113 087.01 000	8254 Hawkins Road, College Grove, TN 37046-9113	4.96
92	113 088.00 000	8241 Haley Road, College Grove, TN 37046-9112	19.88
93	113 088.01 000	8251 Haley Road, College Grove, TN 37046-9112	2.04
94	113 088.02 000	8255 Haley Road, College Grove, TN 37046-9112	2.03
95	113 088.04 000	8265 Haley Road, College Grove, TN 37046-9112	18.95
96	113 088.05 000	8247 Haley Road, College Grove, TN 37046-9112	2.06
97	113 089.00 000	8268 Haley Road, College Grove, TN 37046-9111	40.05
		Total	1,750.99

Superior Wastewater Systems, LLC**Proposed Triune Service Territory – Section 4 Address Detail**

Item	Parcel ID	Parcel Address	Acreage
1	110 038.00 000	7912 Nolensville Road, Arrington, TN 37014	11.62
2	110 039.00 000	7906 Nolensville Road, Arrington, TN 37014-9145	3.51
3	110 040.00 000	7896 Nolensville Road, Arrington, TN 37014-9145	2.03
4	110 041.00 000	7892 Nolensville Road, Arrington, TN 37014-9145	1.71
5	110 042.00 000	2901 Spanntown Road, Arrington, TN 37014-9137	2.82
6	110 043.00 000	2907 Spanntown Road, Arrington, TN 37014-9137	4.53
7	110 043.01 000	2911 Spanntown Road, Arrington, TN 37014-9137	2.01
8	110 043.02 000	2913 Spanntown Road, Arrington, TN 37014-9137	2.01
9	110 043.03 000	2915 Spanntown Road, Arrington, TN 37014-9137	1.98
10	110 043.04 000	2909 Spanntown Road, Arrington, TN 37014-9137	2.02
11	110 043.05 000	2909 Spanntown Road, Arrington, TN 37014-9137	2.00
12	110 044.00 000	2917 Spanntown Road, Arrington, TN 37014-9137	16.76
13	110 044.01 000	2923 Spanntown Road, Arrington, TN 37014-9137	4.19
14	110 044.02 000	2921 Spanntown Road, Arrington, TN 37014-9137	4.60
15	110 045.00 000	Spanntown Road, TN	13.68
16	110 045.01 000	2927 Spanntown Road, Arrington, TN 37014-9137	11.57
17	110 047.02 000	2931 Spanntown Road	5.05
18	110 047.03 000	2939 Spanntown Road, Arrington, TN 37014-9137	5.61
19	110 047.04 000	2935 Spanntown Road, Arrington, TN 37014-9137	31.70
20	110 048.13 000	2953 Spanntown Road, Arrington, TN 37014-9137	22.29
21	110 048.14 000	2949 Spanntown Road, Arrington, TN 37014-9137	2.44
22	110 048.15 000	2943 Spanntown Road, Arrington, TN 37014-9137	78.82
23	110 048.18 000	2947 Spanntown Road, Arrington, TN 37014-9137	5.14
24	110 051.00 000	2983 Spanntown Road, Arrington, TN 37014-9137	198.25
25	110 051.01 000	2955 Spanntown Road, Arrington, TN 37014-9137	5.38
26	110 051.03 000	2961 Spanntown Road, Arrington, TN 37014-9137	5.09
27	110 051.05 000	2957 Spanntown Road, Arrington, TN 37014-9137	5.08
28	112 002.00 000	Murfreesboro Road, TN	1.43
29	112 002.01 000	Murfreesboro Road, TN	5.07
30	112 002.02 000	Murfreesboro Road, TN	1.22
31	112 003.00 000	5346 Murfreesboro Road, College Grove, TN 37046-9176	6.19
32	112 004.01 000	5359 Murfreesboro Road, College Grove, TN 37046-9178	4.89
33	112 005.00 000	5350 Murfreesboro Road, College Grove, TN 37046-9176	4.54
34	112 006.00 000	Murfreesboro Road, TN	35.41

35	112 006.01 000	2134 New Castle Road, Arrington, TN 37014-9140	32.74
36	112 006.02 000	Murfreesboro Road, TN	1.24
37	112 006.03 000	Murfreesboro Road, TN	5.44
38	112 006.04 000	5375 Murfreesboro Road, College Grove, TN 37046-9178	6.71
39	112 007.00 000	5365 Murfreesboro Road, College Grove, TN 37046-9178	1.70
40	112 008.00 000	Murfreesboro Road, TN	2.42
41	112 009.00 000	Murfreesboro Road, TN	3.15
42	112 010.00 000	5393 Murfreesboro Road, College Grove, TN 37046-9178	1.21
43	112 011.00 000	5391 Murfreesboro Road, College Grove, TN 37046-9178	1.24
44	112 012.00 000	5389 Murfreesboro Road, College Grove, TN 37046	0.32
45	113 011.00 000	7960 Nolensville Road, Arrington, TN 37014-9145	2.45
46	113 012.00 000	Nolensville Road, TN	0.77
47	113 013.00 000	Murfreesboro Road, TN	1.08
48	113 014.00 000	5114 Murfreesboro Road, College Grove, TN 37046-8135	1.15
49	113 015.00 000	5118 Murfreesboro Road, College Grove, TN 37046-8135	1.19
50	113 016.00 000	5122 Murfreesboro Road, College Grove, TN 37046-8135	1.00
51	113 017.00 000	5126 Murfreesboro Road, College Grove, TN 37046-8135	1.12
52	113 018.00 000	5130 Murfreesboro Road, College Grove, TN 37046-8135	1.15
53	113 019.00 000	5134 Murfreesboro Road, College Grove, TN 37046-8135	1.55
54	113 019.01 000	3035 Old Murfreesboro Road, College Grove, TN 37046-8904	1.07
55	113 020.00 000	3031 Old Murfreesboro Road, College Grove, TN 37046-8904	0.90
56	113 021.00 000	Old Murfreesboro Road, TN	0.92
57	113 021.01 000	3023 Old Murfreesboro Road, College Grove, TN 37046-8904	0.94
58	113 022.00 000	Old Murfreesboro Road, TN	1.09
59	113 023.00 000	7954 Nolensville Road, Arrington, TN 37014-9145	6.44
60	113 025.00 000	7950 Nolensville Road, Arrington, TN 37014	0.11
61	113 026.00 000	3004 Old Murfreesboro Road, College Grove, TN 37046	0.13
62	113 027.00 000	3008 Old Murfreesboro Road, College Grove, TN 37046-8903	0.74
63	113 028.00 000	3012 Old Murfreesboro Road, College Grove, TN 37046-8903	1.46
64	113 029.00 000	3002 Old Murfreesboro Road, College Grove, TN 37046-8903	0.73
65	113 030.00 000	3003 Fullerton Lane, College Grove, TN 37046-8916	0.94
66	113 031.00 000	3007 Fullerton Lane, College Grove, TN 37046-8916	0.85
67	113 032.00 000	7940 Nolensville Road, Arrington, TN 37014	1.91
68	113 033.00 000	7932 Nolensville Road, Arrington, TN 37014-9145	4.80
69	113 035.00 000	7918 Nolensville Road, Arrington, TN 37014-9145	3.42
70	113 036.00 000	7924 Nolensville Road, Arrington, TN 37014-9145	23.05
71	113 036.01 000	7930 Nolensville Road, Arrington, TN 37014-9145	0.98
72	113 037.00 000	7928 Nolensville Road, Arrington, TN 37014-9145	17.13
73	113 038.00 000	3036 Old Murfreesboro Road, College Grove, TN 37046-8905	16.35
74	113 039.01 000	3010 Fullerton Lane, College Grove, TN 37046-8915	6.43
75	113 040.00 000	3042 Old Murfreesboro Road, College Grove, TN 37046-8905	1.00

76	113 040.01 000	Old Murfreesboro Road, TN	16.74
77	113 041.00 000	3048 Old Murfreesboro Road, College Grove, TN 37046-8905	0.93
78	113 042.00 000	3064 Old Murfreesboro Road, College Grove, TN 37046-8905	2.46
79	113 043.00 000	3054 Old Murfreesboro Road, College Grove, TN 37046	11.84
80	113 043.01 000	3052 Old Murfreesboro Road, College Grove, TN 37046-8905	90.44
81	113 043.03 000	3056 Old Murfreesboro Road, College Grove, TN 37046	6.43
82	113 043.06 000	Old Murfreesboro Road, TN	42.97
83	113 044.00 000	3088 Old Murfreesboro Road, College Grove, TN 37046	46.32
84	113 044.01 000	3094 Old Murfreesboro Road, College Grove, TN 37046-8905	1.00
85	113 044.02 000	3092 Old Murfreesboro Road, College Grove, TN 37046-8905	1.07
86	113 044.03 000	3104 Old Murfreesboro Road, College Grove, TN 37046-8918	5.04
87	113 044.04 000	3106 Old Murfreesboro Road, College Grove, TN 37046-8918	14.94
88	113 044.05 000	3116 Old Murfreesboro Road, College Grove, TN 37046-8918	5.77
89	113 044.06 000	3112 Old Murfreesboro Road, College Grove, TN 37046-8918	3.70
90	113 045.00 000	3140 Old Murfreesboro Road, College Grove, TN 37046-8918	134.98
91	113 045.01 000	Murfreesboro Road, TN	161.75
92	113 045.02 000	3148 Old Murfreesboro Road, College Grove, TN 37046-8918	16.96
93	113 045.03 000	2971 Spanntown Road, Arrington, TN 37014-9137	9.66
94	113 045.04 000	2975 Spanntown Road, Arrington, TN 37014-9137	9.66
95	113 045.06 000	2963 Spanntown Road, Arrington, TN 37014-9137	15.07
96	113 046.00 000	2171 New Castle Road, Arrington, TN 37014-9141	57.52
97	113 046.02 000	2141 New Castle Road, Arrington, TN 37014-9141	1.28
98	113 049.00 000	2116 New Castle Road, Arrington, TN 37014-9140	10.80
99	113 051.00 000	2110 New Castle Road, Arrington, TN 37014-9140	3.31
100	113 051.01 000	5324 Murfreesboro Road, College Grove, TN 37046	2.74
101	113 052.00 000	5308 Murfreesboro Road, College Grove, TN 37046-9176	67.96
102	113 056.00 000	3097 Old Murfreesboro Road, College Grove, TN 37046-8904	137.94
103	113 056.02 000	3080 Old Murfreesboro Road, College Grove, TN 37046-8905	11.98
104	113 057.02 000	5144 Murfreesboro Road, College Grove, TN 37046-8135	4.26
105	113 057.03 000	5148 Murfreesboro Road, College Grove, TN 37046-8135	7.39
106	113 057.04 000	3047 Old Murfreesboro Road, College Grove, TN 37046-8904	0.68
		Total	1,573.25

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

3. Rule 1220-04-13-.17(2)(a)7(i). The rule requires a map showing the “location of the wastewater system” including “the physical address of the wastewater system and the associated latitude and longitude coordinates.” The map provided in Attachment 2, Exhibit 1.7 and appearing again in Attachment 2, Exhibit 2.1 of the Petition does not show the location of the wastewater system and does not provide a physical address with the coordinates required by the rule. Please file the missing information in this Docket as required by the rule.

Response:

The physical address of the proposed wastewater system is as follows:

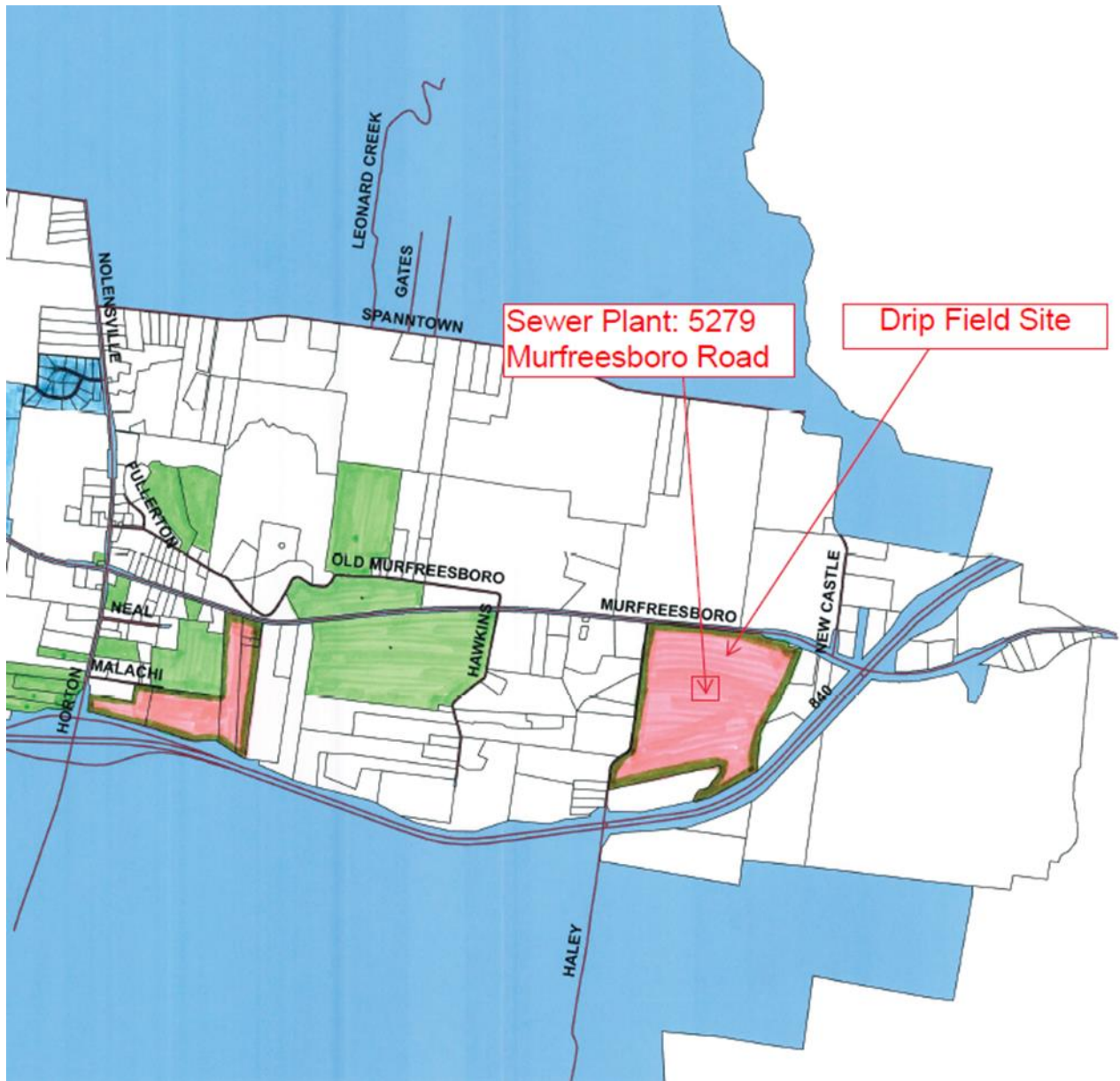
5279 Murfreesboro Road
College Grove, TN 37046

The latitude and longitude coordinates of the wastewater system are as follows:

Latitude: 35.84934
Longitude -86.62463

Please see Attachment CA1-3a for a map of the proposed wastewater plant and drip field sites.

**Superior Wastewater Systems, LLC
Proposed Triune Wastewater Plant and Drip Field Sites**



SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

4. Rule 1220-04-13-.17(2)(a)7(iv). The rule requires a map showing “[a]ll residences and habitable structures served by the wastewater system.” The map provided in Attachment 2, Exhibit 1.7 and appearing again in Attachment 2, Exhibit 2.1 of the Petition does not identify all residences and habitable structures served. Please file the missing information in this Docket as required by the rule.

Response:

Please see Attachment CA1-2a. Currently we do not have a map detailing every single residence or habitable structure in each of these development sections. Instead, the maps included in Attachment CA1-2a are broken out by land parcels. These parcels include the residences that SWS intends to serve, although the specific service connection date has yet to be determined.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

5. Rule 1220-04-13-.17(2)(a)8. The rule requires a description of the proposed wastewater system including “the maximum potential number of customers the utility will service in the proposed area.” However, the description provided in Attachment 2, Exhibit 1.8 to the Petition does not state “the maximum potential of customers the utility will service in the proposed service area.” Please file the missing information in this Docket as required by the rule.

Response:

It appears that the Commission’s existing wastewater rules do not envision the creation of the regional wastewater system proposed here as opposed to one that is designed to only support a single subdivision. Specifically, the existing rules do not address the complexity of different wastewater streams associated with providing service to both residential and commercial customers. As a result, SWS is unable to meaningfully provide the maximum potential number of customers that we will service in the proposed area since the specific usage requirements for individual commercial customers (businesses, retail stores, restaurants, office buildings) is unknown.

Instead of considering the maximum potential number of customers, SWS believes that the focus should be placed on total wastewater usage (in gallons per day) and waste strength. The treatment plant built at the beginning of Phase 1 will eventually have the capacity to treat 300,000 gallons per day. As this phase spans 3 to 4 years, new drip fields will be completed as the need arises that will provide an additional treatment capacity of 87,500 gallons per day.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

6. Rule 1220-04-13-.17(2)(a)10. The rule requires Superior to “state how many phases and the number of houses or units to be connected in each phase.” Attachment 2, Exhibit 1.9 to the Petition states that “[i]n this mixed use area, the number of lots cannot be determined,” and Attachment 2, Exhibit 1.10 provides no information concerning the number of houses or units.

Response:

SWS expects construction in the proposed area to be done in the following phases:

Phase 1	3 to 4 Years
Phase 2	3 to 7 Years
Phase 3	6 to 10 Years

According to Exhibit 5.2, Schedule 2.6 that was included with the Company’s Petition, the projected number of residential houses or units to be added by construction year will be as follows:

Construction Year	Residential Units Added
Year 1	68
Year 2	147
Year 3	15
Year 4	36
Year 5	21
Total	287

In addition to these residential customers, there will also be commercial customers that are added to the proposed system. However, SWS has no way of determining the exact timeline of when specific commercial customers and loads will be made.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

Rule 1220-04-13-.17(2)(b) Requisite Property Rights and Public Need

7. Rule 1220-04-13-.17(2)(b)3. The rule requires certain documentation demonstrating “entitlement or ownership to the land, system specifications, costs for the wastewater system, timeline for the system to be built, and rights to the system once it is completed.” Such information was filed under seal, and the Consumer Advocate does not have access to the information for review.

Response:

The information provided under seal includes data that SWS considers to be proprietary. As a result, SWS is unable to provide this information to non-intervening parties that have not executed a non-disclosure agreement.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

Rule 1220-04-13-.17(2)(e) Sufficient Financial Capability

8. Rule 1220-04-13-.17(2)(e)6. The rule requires “detailed construction cost estimates for each phase.” Although Attachment 2, Exhibit 5.6 to the Petition gives a total estimated cost of \$12,945,000, it appears that detailed estimates for each phase are not provided. Additionally, the estimate in Attachment 2, Exhibit 5.6 does not correlate with the proposed accounting presented in Exhibit 5.4 to the Petition. Please file the missing information in this Docket as required by the rule.

Response:

The projected costs for each phase of the construction are as follows:

Cost Component	Phase 1 Cost	Phase 2 Cost	Phase 3 Cost	Total Cost
Land	\$6,705,000	\$0	\$0	\$6,705,000
Drip Field	1,220,600	1,184,700	1,184,700	3,590,000
Plant	750,000	750,000	750,000	2,250,000
Collection Lines	400,000	0	0	400,000
Total	\$9,075,600	\$1,934,700	\$1,934,700	\$12,945,000

Exhibit 5.4 of the Petition shows the initial accounting entry for a total of \$2,290,000 with \$400,000 debited to Collection Lines and \$1,890,000 debited to Treatment & Disposal Equipment. The \$400,000 cost for the Collection Line is shown in the table above. The \$1,890,000 cost for the Treatment & Disposal Equipment can be traced back to Exhibit 5.6 of the Petition and represents the high and low average (\$1,530,000 to \$2,250,000) for this category. The Land and Drip Field costs shown in the table above were not included in the projected accounting entry on Exhibit 5.4 of the Petition since these costs are expected to be transferred through a quit claim deed at a nominal value.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

Rule 1220-04-13-.17(2)(e) Sufficient Financial Capability

9. Rule 1220-04-13-.17(2)(e)10, 11. The rules require a description of “bonding requirements imposed by municipal governments” and a performance bond “for an amount equal to or greater than the cost of the system as provided in contracts between builder, developer and/or utility.” Superior has stated in Attachment 2, Exhibits 5.10 and 5.11 to the Petition that the required bond amount is currently unknown and that a performance bond is premature.

Response:

Williamson County requires a Performance Bond for wastewater treatment and disposal systems equal to 30% of the cost. Since the wastewater system is to be constructed in phases, separate Performance and/or Maintenance Bonds will be required for each construction phase.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

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

10. Rule 1220-04-13-.17(2)(d)(1). The rule requires a “copy of the application for the State Operating Permit (‘SOP’) filed with TDEC”, “the letter from TDEC indicating the receipt of a complete application”, and “any engineering and/or design reports submitted to TDEC, such as the Design Development Report and the Detailed Soils Investigation Report”. Attachment 2, Exhibit 4.1 to the Petition provides a copy of Superior’s SOP application, an email correspondence noting that the application was uploaded to the TDEC database. Superior also notes that the requested reports are not yet available. In addition to the missing reports, the email correspondence from TDEC provided in the Petition does not indicate the receipt of a complete application. Please see the Consumer Advocate’s “Attachment A.1” below, showing the “Incomplete” status of the SOP application. This information can be accessed directly from TDEC’s “DataViewer” at: https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:34051:734980050118:::34051:P34051_PERMIT_NUMBER:SOP-23016. Please file the missing information in this Docket as required by the rule.

Response:

The cost for completing an entire SOP application is several thousand dollars and includes analysis by outside soil scientists and wastewater engineers. SWS believes that these costs would be wasted without first obtaining a CCN for the proposed service territory. SWS is presently moving forward on completing the components for these studies. However, SWS cannot start the construction or operation of the proposed wastewater plant without first obtaining an SOP Permit along with approved construction drawings. Therefore, SWS now requires a CCN approval from TPUC in order to fully complete the necessary TDEC requirements.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

Rule 1220-04-13-.17(2)(f) Sworn Testimony

11. Rule 1220-04-13-.17(2)(f)3. The rule requires a “statement that the applicant is aware of and will abide by all applicable Tennessee statutes and TPUC Rules.” (Emphasis added). On page 5 of the pre-filed Direct Testimony of John Powell included with the Petition, Mr. Powell answers “Yes” to the question “Will SWS abide by the orders and rules of the Commission?”

Response:

SWS believes that the statement included in the Direct Testimony of John Powell fully addresses the requirement of this rule. However, in order to avoid any ambiguity of the Commission’s specific requirements, SWS makes the following statement:

Superior Wastewater Systems, LLC is aware of and will abide by applicable Tennessee statutes and TPUC Rules.

SUPERIOR WASTEWATER SYSTEMS, LLC
DOCKET NO. 23-00051 – PETITION FOR A CCN TO PROVIDE SERVICE TO TRIUNE
SWS RESPONSES TO CONSUMER ADVOCATE COMMENTS ON MFRs

Rule 1220-04-13-.17(2)(f) Sworn Testimony

12. Rule 1220-04-13-.17(2)(f)6. The 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.” Attached to the pre-filed Direct Testimony of John Powell included with the Petition is an Affidavit of Mr. Powell that states “I, John Powell, on behalf of Superior Wastewater Systems, LLC hereby certify that the attached direct testimony represents my opinion in the above referenced case.” (Emphasis added).

Response:

SWS believes that the affidavit included with the Direct Testimony of John Powell fully addresses the requirement of this rule. However, in order to avoid any ambiguity of the Commission’s specific requirements, SWS includes an updated affidavit as shown in Attachment CA1-12a.

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

**PETITION OF SUPERIOR
WASTEWATER SYSTEMS, LLC TO
AMEND ITS EXISTING SERVICE
TERRITORY IN WILLIAMSON
COUNTY**

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DOCKET NO. 23-00051

AFFIDAVIT

I, John Powell, on behalf of Superior Wastewater Systems, LLC hereby certify that the information submitted concerning the wastewater CCN application is true and correct to the best of my knowledge and belief.



John Powell

Sworn to and subscribed before me this 2 day of August, 2023.



NOTARY PUBLIC



My Commission expires: 3-22-26