

# TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243-0001

February 14, 2024

Mr. Erik C. Lybeck  
Sims|Funk, PLC  
3322 West End Ave., Suite 200  
Nashville, TN 37203  
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**Electronically Filed in TPUC Docket Room  
on February 14, 2024 at 4:06 p.m.**

Mr. John Powell, President  
Superior Wastewater Systems, LLC  
PO Box 40  
Arrington, TN 37014  
Email: [john-powell@comcast.net](mailto:john-powell@comcast.net)

In Re: *Petition of Superior Wastewater Systems, LLC for Approval to Withdraw Escrow Funds*, Docket No. 24-00004

Dear Sirs:

To assist the Commission in its ongoing investigation into the above referenced docket, it is requested that responses be provided to the following:

1. Please refer to the Direct Testimony of John Powell, page 3, lines 10 through 13, which states that the requested pump replacement costs (\$3,274.18), as well as the regulatory and legal costs associated with filing the petition in this docket (estimated \$2,000), are not included in Superior's base rates. Please refer to Party Staff Workpaper 2.01, lines 15 through 18, 29 and 31, attached to the Direct Testimony of Craig Cox filed in Docket No. 22-00087, which show an aggregate of \$66,102 for accounting, administrative, and legal costs that are included in a total pre-tax attrition period cost-of-service of \$162,570 approved by the Commission, which equates to more than 40% of base rates computed for purposes of recovering such costs on a prospective basis. Please refer to Superior's ARM Tariff approved by the Commission in Docket No. 23-00069 that permits an annual inflation adjustment of base rates effective January 1, 2024.

In light of the foregoing, please provide a detailed explanation, as well as any supporting analysis and documentation, that supports the Company's assertion that no regulatory or legal costs associated with a petition to withdraw escrow funds have been included in base rates.

2. Please provide the number of pump replacements each year for the last three calendar years 2021 through 2023.

Please provide all responses no later than 2:00 p.m. on Wednesday, February 21, 2024. Responses may be submitted electronically at [tpuc.docketroom@tn.gov](mailto:tpuc.docketroom@tn.gov) with one hard copy mailed to the Docket Manager at the Tennessee Public Utility Commission, 502 Deaderick Street, 4<sup>th</sup> Floor, Nashville, Tennessee 37243.

Please contact me should you have questions or need clarification of any requested item. Thanks for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "michelle mairs".

Michelle Mairs, Deputy Director  
Utilities Division  
(615) 770-6891  
[Michelle.Mairs@tn.gov](mailto:Michelle.Mairs@tn.gov)

C: Docket File