

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

<b>IN RE:</b>	)	
	)	
<b>PETITION OF TENNESSEE</b>	)	
<b>WASTEWATER SYSTEMS, INC., TO</b>	)	<b>DOCKET NO. 24-00014</b>
<b>AMEND ITS CERTIFICATE OF</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	

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**PETITION TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY  
TO INCLUDE THE MOSLEY FARM SUBDIVISION**

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Tennessee Wastewater Systems, Inc. (“TWSI”, “Utility”, or “Company”) petitions the Tennessee Public Utility Commission (“TPUC”) to amend its Certificate of Convenience and Necessity to expand its service area to include a residential subdivision known as the Mosley Farm Subdivision in Williamson County.

As demonstrated in the application and attached exhibits, there is a public need for service and TWSI has the requisite management experience, financial capability, and technical expertise to provide such service pursuant to the rules and regulations of the Commission. In support of its Petition, TWSI states as follows:

**General Information:**

1. The applicant is Tennessee Wastewater Systems, Inc. which is located at 851 Aviation Parkway, Smyrna, TN 37167.
2. **Organizational Chart** – See Exhibit 2
3. Tennessee Wastewater Systems, Inc. is wholly owned by Adenus Group, LLC. The members of Adenus Group, LLC are Thomas Pickney, William

Pickney, and Robert Pickney. 849 Aviation Parkway, Smyrna, TN 37167. Each owns 33.3% of Adenus Group, LLC.

4. **Corporate Organizational Chart with Affiliates** – See Exhibit 4 – Adenus Technologies, LLC will provide certain materials and supplies to the project as well as panels and telemetry monitoring to the system. Adenus Solutions Group, LLC will construct the wastewater treatment system and drip field. TWSI is aware of and will abide by the Commission's affiliate transaction rules with respect to transactions between TWSI and its affiliates.
5. **Articles of Incorporation** – See Exhibit 5
6. **Tennessee Business License** – See Exhibit 6
7. **Description of Geographic Territory** – The Mosley Farm Subdivision is located at 9621 Clovercroft Road in Williamson County. See Map as Exhibit 7.
8. **Description of the Proposed Wastewater System** – The proposed system is designed for 25,000 gpd of wastewater flow, comprised of a watertight effluent pressure collection system, utilizing STEP/STEG tanks and a recirculating media filter treatment system. The treated effluent will be land applied for disposal. The treatment system will not be built in phases.
9. **Estimated Dates for commencement and completion of construction** – Construction will commence at a time agreeable between the developer and its contractor and will take approximately 180 days. TWSI is aware of TPUC Rule 1220-04-13-.09(7) and fully expects the wastewater system to be completed within 3 years from the date of the written order granting the CCN. Notice of completion of the system will be filed in this docket as required by the Rule.
10. **Phases/Houses per Phase** – The subdivision will consist of 74 single family homes and an amenity center which will be built in one phase (See Exhibit 7).
11. **Builder/Developer Identity** – See Request to Serve Letter Exhibit 11

Clay Lane, Authorized Representative  
Partners in Building  
8119 Isabella Ln., Suite 103

Brentwood, TN 37027  
615-486-4006  
[clay.lane@partnersinbuilding.com](mailto:clay.lane@partnersinbuilding.com)

**Existence of Public Need and Property Rights**

12. **Letters from local governments and utilities** – See Exhibits 12A and 12B.
13. **Franchise Agreement** – n/a
14. **Contracts and Agreements** – See Exhibit 14 (Sewer Service Agreement). Any additional relevant contract will be filed in this docket once available. Adenus Solutions Group, LLC, a TWSI affiliate, will be building the system for the developer. The construction contract will be filed in this docket upon execution.

**Managerial Ability:**

15. **Biographies of officers and key wastewater utility staff w/ list of certifications or professional licenses** – See Exhibit 15
16. TWSI is a certified wastewater provider in the State of Tennessee. Its parent company Adenus Group, LLC owns certified wastewater providers in Alabama, and Ohio.
17. **Merger/Acquisition** – n/a
18. **Treatment System Contractor** – Adenus Solutions Group, LLC is the contractor to build the system. The contractor's license is Exhibit 18.

**Technical Ability:**

19. **SOP Application/Permit** – See Exhibit 19 (Application). The letter of complete application, along with the draft SOP and final SOP will be filed in this docket once issued by TDEC.
20. **State Operator Certificate** – See Exhibit 20
21. **TWSI Contact Person:**

Matthew Nicks  
Tennessee Wastewater Systems, Inc.

615-220-7200  
[Matthew.Nicks@adenus.com](mailto:Matthew.Nicks@adenus.com)

22. **Engineering Certification** –The system has not been constructed at this time. The certification will be filed in this docket upon acceptance of the system by TWSI.

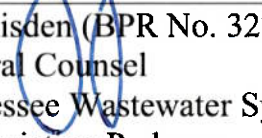
**Financial Capability:**

23. **Financial Statements** – See Exhibits 23A, 23B, and 23C.
24. **Pro Forma** (Five years of operations) –With almost 5700 customers, the addition of 74 customers at the Mosely Farm Subdivision will have minimal impact to the Company’s overall finances (as shown in Exhibits 23 and 31).
25. **NARUC Chart of Accounts** – See Exhibit 25
26. **Plant in service account numbers** – See Exhibit 26
27. **Depreciation rates/schedule** – Depreciation is straight line with the following schedule:
- Building – 15 years
  - Fence – 7 years
  - Panel – 7 years
  - Tank – 10 years
  - Treatment – 26 years
28. **Estimated Cost of Construction** – See Exhibit 28.
29. TWSI will own the system once it is completed, inspected, and accepted by the Utility. Estimated amount of contributed capital will include the treatment plant and collection system, as well as the cost of the land conveyed to the Utility. These costs are not known at this time but will be filed in this Docket along with the actual cost of the treatment system when provided by the Developer to TWSI, no later than at the time the final plat is signed by the Utility. Contributed Capital is recorded when the system is commissioned (accepted) by debiting the appropriate utility plant in service asset account and crediting the CIAC account.

30. **Tariff** – On file with the Commission. See Exhibit 30 for addition of the Wyelea Farms Subdivision to the residential and commercial tariff sheets.
31. **Five Year Build Out Estimate of Development** – See Exhibit 31
32. **Municipal Bonding Requirements** – See Item 33.
33. **Performance Bond** – Williamson County requires a performance bond from the developer prior to the commencement of any construction on the system. A copy of the performance bond will be filed in this docket prior to the commencement of construction of this project.
34. **Funding Sources** - The developer is responsible for funding the construction of the wastewater system.
35. **Financial Security** – On file with the Commission.

THEREFORE, having shown that a public need exists and that TWSI possesses the requisite managerial, technical, and financial capabilities to provide service to the Mosely Farm Subdivision in Williamson County, Tennessee, TWSI respectfully requests the Commission's approval of this Petition.

RESPECTFULLY SUBMITTED,



\_\_\_\_\_  
Jeff Riden (BPR No. 32769)  
General Counsel  
Tennessee Wastewater Systems, Inc.  
851 Aviation Parkway  
Smyrna, TN 37167  
(615) 220-7171  
[jeff.riden@adenus.com](mailto:jeff.riden@adenus.com)

**Tennessee Wastewater Systems, Inc.**

**Organizational Chart**

**Jeff Riden, CEO**

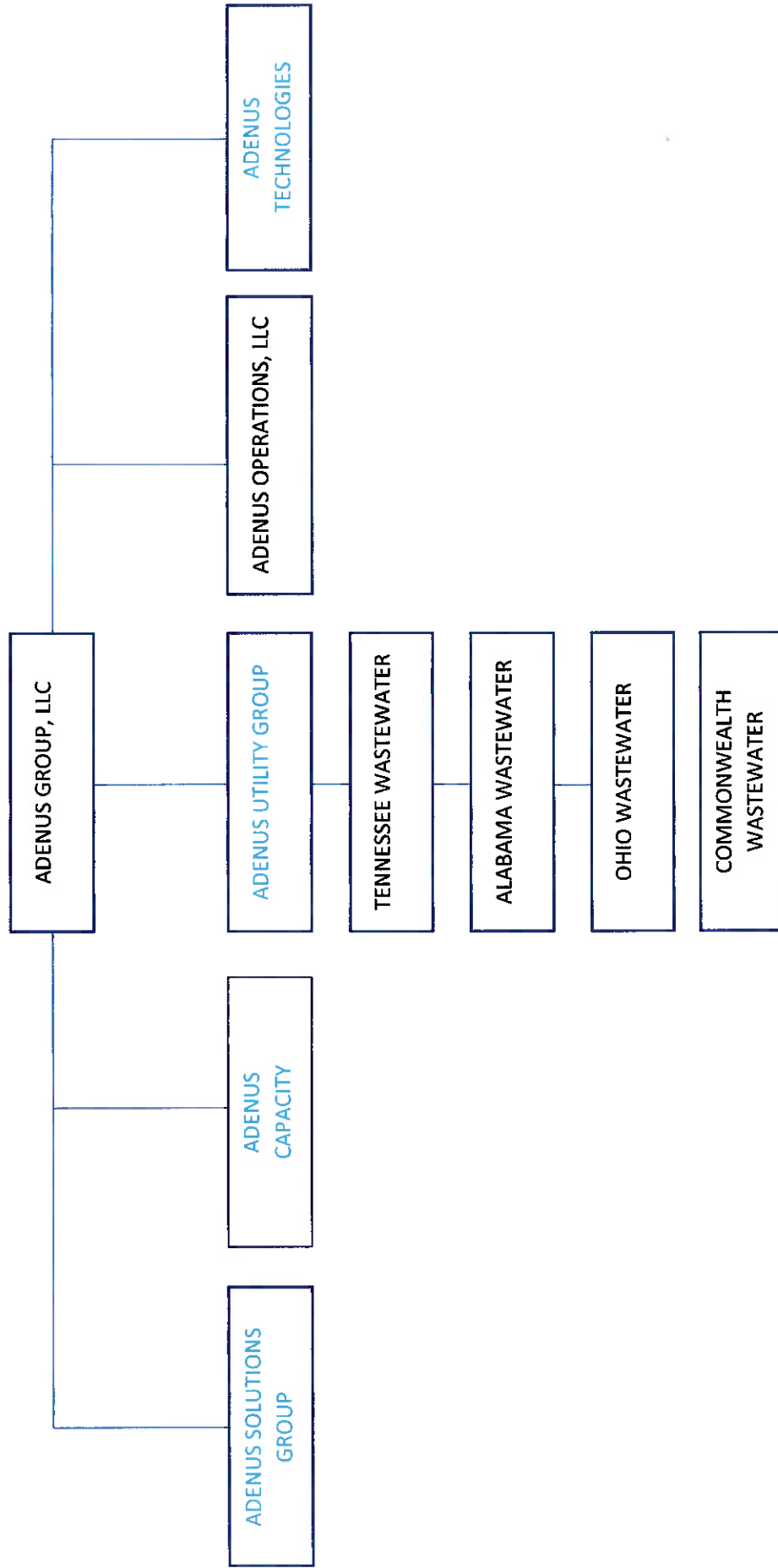
**Matthew Nicks, President**


**Thomas Pickney, Secretary**

**William Pickney, Treasurer**

**Tim Barber, Controller**

ADENUS GROUP, LLC  
AFFILIATE  
ORGANIZATIONAL CHART



 <p style="text-align: center;"><b>State of Tennessee</b></p> <p style="text-align: center;"><b>Department of State</b> Corporate Filings 312 Eighth Avenue North 6th Floor, William R. Snodgrass Tower Nashville, TN 37243</p>	<p>4348 1792</p> <p><b>ARTICLES OF AMENDMENT TO THE CHARTER (For-Profit)</b></p>	<p style="text-align: right; font-size: small;">For Office Use Only</p> <div style="text-align: center; font-size: 2em; font-weight: bold; margin-top: 20px;">FILED</div>		
<p><b>CORPORATE CONTROL NUMBER (IF KNOWN)</b> <u>0263854</u></p>				
<p><b>PURSUANT TO THE PROVISIONS OF SECTION 48-20-106 OF THE TENNESSEE BUSINESS CORPORATION ACT, THE UNDERSIGNED CORPORATION ADOPTS THE FOLLOWING ARTICLES OF AMENDMENT TO ITS CHARTER:</b></p>				
<p>1. PLEASE INSERT THE NAME OF THE CORPORATION AS IT APPEARS OF RECORD:  <u>ON-SITE SYSTEMS, INC.</u>          IF CHANGING THE NAME, INSERT THE NEW NAME ON THE LINE BELOW:  <u>Tennessee Wastewater Systems, Inc.</u></p>				
<p>2. PLEASE MARK THE BLOCK THAT APPLIES:</p> <p><input checked="" type="checkbox"/> AMENDMENT IS TO BE EFFECTIVE WHEN FILED BY THE SECRETARY OF STATE.  <input type="checkbox"/> AMENDMENT IS TO BE EFFECTIVE, _____ (MONTH, DAY, YEAR)          (NOT TO BE LATER THAN THE 90TH DAY AFTER THE DATE THIS DOCUMENT IS FILED.) IF NEITHER BLOCK IS CHECKED, THE AMENDMENT WILL BE EFFECTIVE AT THE TIME OF FILING.</p>				
<p>3. PLEASE INSERT ANY CHANGES THAT APPLY:</p> <p>A. PRINCIPAL ADDRESS: _____  <small>CITY STATE/COUNTY ZIP CODE</small></p> <p>B. REGISTERED AGENT: _____</p> <p>C. REGISTERED ADDRESS: _____  <small>TN STATE ZIP CODE COUNTY</small></p> <p>D. OTHER CHANGES: _____</p>				
<p>4. THE CORPORATION IS FOR PROFIT.</p>				
<p>5. THE MANNER (IF NOT SET FORTH IN THE AMENDMENT) FOR IMPLEMENTATION OF ANY EXCHANGE, RECLASSIFICATION, OR CANCELLATION OF ISSUED SHARES IS AS FOLLOWS:</p>				
<p>6. THE AMENDMENT WAS DULY ADOPTED ON <u>June 30, 2003</u> (MONTH, DAY, YEAR)          BY (Please mark the block that applies):</p> <p><input type="checkbox"/> THE INCORPORATORS WITHOUT SHAREHOLDER ACTION, AS SUCH WAS NOT REQUIRED.  <input checked="" type="checkbox"/> THE BOARD OF DIRECTORS WITHOUT SHAREHOLDER APPROVAL, AS SUCH WAS NOT REQUIRED.  <input type="checkbox"/> THE SHAREHOLDERS.</p>				
<table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p><u>PRESIDENT</u> SIGNER'S CAPACITY</p> <p>_____ DATE</p> </td> <td style="width: 50%; vertical-align: top;"> <p><u>Charles L. Pickney, Jr.</u> SIGNATURE</p> <p><u>Charles L. Pickney, Jr.</u> NAME OF SIGNER (TYPED OR PRINTED)</p> </td> </tr> </table>			<p><u>PRESIDENT</u> SIGNER'S CAPACITY</p> <p>_____ DATE</p>	<p><u>Charles L. Pickney, Jr.</u> SIGNATURE</p> <p><u>Charles L. Pickney, Jr.</u> NAME OF SIGNER (TYPED OR PRINTED)</p>
<p><u>PRESIDENT</u> SIGNER'S CAPACITY</p> <p>_____ DATE</p>	<p><u>Charles L. Pickney, Jr.</u> SIGNATURE</p> <p><u>Charles L. Pickney, Jr.</u> NAME OF SIGNER (TYPED OR PRINTED)</p>			
<p>SS-4421 (Rev. 10/01) <span style="margin-left: 150px;">Filing Fee: \$20.00</span> <span style="float: right;">RDA 1678</span></p>				





**Tre Hargett**  
Secretary of State

**Division of Business Services**  
**Department of State**

State of Tennessee  
312 Rosa L. Parks AVE, 6th FL  
Nashville, TN 37243-1102

JEFF RISDEN  
ADENUS GROUP, LLC  
849 AVIATION PARKWAY  
SMYRNA, TN 37167

August 9, 2023

Request Type: Certificate of Existence/Authorization  
Request #: 0541904

Issuance Date: 08/09/2023  
Copies Requested: 1

Document Receipt

Receipt #: 008296648

Filing Fee: \$20.00

Payment-Credit Card - State Payment Center - CC #: 3856142652

\$20.00

Regarding: TENNESSEE WASTEWATER SYSTEMS, INC.

Filing Type: For-profit Corporation - Domestic

Control #: 263854

Formation/Qualification Date: 03/16/1993

Date Formed: 03/16/1993

Status: Active

Formation Locale: TENNESSEE

Duration Term: Perpetual

Inactive Date:

Business County: RUTHERFORD COUNTY

CERTIFICATE OF EXISTENCE

I, Tre Hargett, Secretary of State of the State of Tennessee, do hereby certify that effective as of the issuance date noted above

**TENNESSEE WASTEWATER SYSTEMS, INC.**

\* is a Corporation duly incorporated under the law of this State with a date of incorporation and duration as given above;

\* has paid all fees, interest, taxes and penalties owed to this State (as reflected in the records of the Secretary of State and the Department of Revenue) which affect the existence/authorization of the business;

\* has filed the most recent annual report required with this office;

\* has appointed a registered agent and registered office in this State;

\* has not filed Articles of Dissolution or Articles of Termination. A decree of judicial dissolution has not been filed.

Tre Hargett  
Secretary of State

Processed By: Cert Web User

Verification #: 062183526

28.7



Conceptual Master Plan

# Moseley Property

Williamson County, Tennessee  
06.28.23

CV. 11

**Clay M. Lane  
Division Land Manager  
Partners in Building of Tennessee, LLC  
8119 Isabella Lane, Suite 103  
Brentwood, Tennessee 37027**

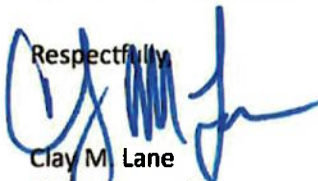
August 22, 2023

Mr. Matthew Nicks  
Adenus Group  
849 Aviation Parkway  
Smyrna, Tennessee 37167

Dear Matt,

This letter is to inform you of our desire to have your firm serve our property known as the Mosley Farm located at 9621 Clovercroft Road, Franklin Tennessee 37067. We plan to construct residential homesites. The property owner, Partners in Building of Tennessee, LLC or assigns shall convey the property for the treatment facility and land application areas to the Utility, Tennessee Wastewater Systems upon completion of construction.

Respectfully,



Clay M. Lane  
Division Land Manager  
Partners in Building of Tennessee, LLC

**Rogers C. Anderson**  
Williamson County Mayor



## WILLIAMSON COUNTY GOVERNMENT

August 31, 2023

Mosley Farm, L.P.  
9621 Clovercroft Road  
Franklin, TN 37067

Mr. Clay Lane  
Partners in Building of Tennessee, LLC  
8119 Isabella Lane, Suite 103  
Brentwood, TN 37027

**Re: Sewer Request for Properties at:**  
**9621 Clovercroft Road, Franklin, TN 37067**  
**Tax Map 59, Parcel 97**

**9627 Clovercroft Road, Franklin, TN 37067**  
**Tax Map 59, Parcel 97.03**

Dear Mosley Farm, L.P. Members and Mr. Lane:

On August 31, 2023, Williamson County received your request that sewer service be provided to the above-named properties. In response to your inquiry, this correspondence confirms that Williamson County Government does not currently provide public sanitary sewer service to these properties and has no plans in the foreseeable future to provide said service.

I hope this information is helpful. Should you need anything further, please do not hesitate to contact me.

Sincerely,

Rogers C. Anderson  
County Mayor







N Nolensville/College Grove Utility District

C P.O. Box 127, 2002 Johnson Industrial Blvd., Nolensville, TN 37135

G Phone No. 615-776-2511 - Fax No. 615-776-2591

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August 29, 2023

Williamson County Planning Commission  
Williamson County Administrative Complex  
1320 West Main St., Suite 400  
Franklin, TN. 37064

Re: Sanitary Sewer Service Release  
9621 Clovercroft Rd (Map 059) (Parcel 09700)

To Whom it may concern:

Nolensville College Grove Utility District by request releases its charter rights to provide sanitary sewer service to the proposed development at 9621 Clovercroft Rd (Map 059) (Parcel 09700).

Please feel free to contact me if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Mike E. Polston". The signature is written in a cursive, flowing style.

Mike E Polston  
General Manager  
NCG Utility District

**CONFIDENTIAL EXHIBIT 14**

**Tennessee Wastewater System, Inc.,  
Officer and Key Employee Biographies**

Tennessee Wastewater Systems, Inc. ("TWSI") is a leader in decentralized wastewater systems and technology in the Southeastern United States. TWSI has been a regulated provider of wastewater services in Tennessee since receiving its initial CCN from the Tennessee Public Service Commission, the predecessor to the current Tennessee Public Utility Commission, in 1994; currently holding over 100 certificates for territories in Middle and East Tennessee and providing service to over 3000 customers across the State.

**Jeff Ridsen, CEO** – Mr. Ridsen joined Adenus in 2015 as General Counsel before rising to CEO in late 2018. Prior to Adenus Mr. Ridsen was in private legal practice and spent over twenty years in the music business as a booking agent and artist manager, representing and guiding the careers of gold and platinum selling, and Grammy nominated musical artists, songwriters, and producers. He received his undergraduate degree from Geneva College in Beaver Falls, PA, and his JD from the Nashville School of Law.

**Matthew Nicks – President** – Mr. Nicks is the President of Tennessee Wastewater Systems, Inc. Mr. Nicks comes from an environmental remediation background. Mr. Nicks has worked all over the world handling and overseeing the collection, treatment, storage, transportation, and shipping of hazardous waste in a variety of industry settings. Matthew has a strong background in regulatory compliance matters including those related to OSHA, NIOSH, ANSI, NFPA, and the EPA. Mr. Nicks is also a residential developer who has developed properties in Davidson County. Mr. Nicks is a Tennessee licensed contractor.

**Tom Pickney – Secretary**

**Bill Pickney – Treasurer**

Tom and Bill Pickney entered the wastewater business in the mid 1980's by constructing low pressure pipe systems for homes, primarily in Williamson County. They were shortly joined by their brother Bob who through his engineering background added system design to their offerings. Soon Pickney Brothers, Inc. was formed and over the coming years helped bring the decentralized wastewater concept to Tennessee. Tom and Bill, along with their brothers Bob and Charles formed On-Site Systems, Inc. in early 1990's. The company was granted its first CCN in 1994. On-Site's name was changed in 2007 to Tennessee Wastewater Systems, Inc. Tom and Bill have extensive, decades long, experience and knowledge of the design, construction, and operations of decentralized wastewater systems.

EX.18

STATE OF TENNESSEE  
DEPARTMENT OF  
COMMERCE AND INSURANCE

ADENUS SOLUTIONS GROUP LLC.

401211

ID NUMBER: 58778  
LIC STATUS: ACTIVE  
EXPIRATION DATE: March 31, 2025

BOARD FOR LICENSING CONTRACTORS  
CONTRACTOR

THIS IS TO CERTIFY THAT ALL REQUIREMENTS  
OF THE STATE OF TENNESSEE HAVE BEEN MET

ADENUS SOLUTIONS GROUP LLC.  
849 AVIATION PARKWAY  
SMYRNA, TN 37167

State of Tennessee

401211 13397694

BOARD FOR LICENSING CONTRACTORS  
CONTRACTOR  
ADENUS SOLUTIONS GROUP LLC.

*This is to certify that all requirements of the State of Tennessee have been met.*

ID NUMBER: 58778  
LIC STATUS: ACTIVE  
EXPIRATION DATE: March 31, 2025  
\$812,630.00; BC-B; BC-C; MU; MU-A; MU-C; MU-D

IN-1313  
DEPARTMENT OF  
COMMERCE AND INSURANCE





Tennessee Department of Environment and Conservation  
 Division of Water Resources  
 William R. Snodgrass - Tennessee Tower  
 312 Rosa L. Parks Avenue, 11th Floor  
 Nashville, Tennessee 37243-1102  
 (615) 532-0625

### APPLICATION FOR A STATE OPERATION PERMIT (SOP)

Type of application: ☒ New Permit ☐ Permit Reissuance ☐ Permit Modification

**Permittee Identification:** (Name of city, town, industry, corporation, individual, etc., applying, according to the provisions of Tennessee Code Annotated Section 69-3-108 and Regulations of the Tennessee Water Quality Control Board.)

Permittee  
 Name **TENNESSEE WASTEWATER SYSTEMS, INC.**  
 (applicant):

Permittee  
 Address: **851 AVIATION PKWY SMYRNA, TN 37167**

Official Contact: <b>JEFF RISDEN</b>	Title or Position: <b>CEO</b>		
Mailing Address: <b>849 AVIATION PKWY</b>	City: <b>SMYRNA</b>	State: <b>TN</b>	Zip: <b>37167</b>
Phone number(s): <b>615-220-7200</b>	E-mail: <b>JEFF.RISDEN@ADENUS.COM</b>		

Optional Contact: <b>BILLY DRANES</b>	Title or Position: <b>OPERATOR</b>		
Address: <b>849 AVIATION PKWY</b>	City: <b>SMYRNA</b>	State: <b>TN</b>	Zip: <b>37167</b>
Phone number(s): <b>615-220-7200</b>	E-mail: <b>BILLY.DRANES@ADENUS.COM</b>		

### Application Certification (must be signed in accordance with the requirements of Rule 0400-40-05-.05)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Name and title; print or type <b>JEFF RISDEN, CEO</b>	Signature	Date
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<b>Facility Identification:</b>		<b>Existing Permit No.</b>	
Facility Name: <b>CLOVERCROFT-MOSLEY TREATMENT FACILITY</b>		County: <b>WILLIAMSON</b>	
Facility Address or Location: <b>9635 CLOVERCROFT RD, NOLENSVILLE TN 37135</b>		Latitude: <b>35.9340</b>	
		Longitude: <b>-86.7033</b>	
Name and distance to nearest receiving waters: <b>UNNAMED TRIBUTARY TO MILL CREEK</b>			
If any other State or Federal Water/Wastewater Permits have been obtained for this site, list their permit numbers: <b>N/A</b>			
Name of company or governmental entity that will operate the permitted system:			
Operator address: <b>851 AVIATION PKWY, SMYRNA TN 37167</b>			
Has the owner/operator filed for a Certificate of Convenience & Necessity (CCN), or an amended CCN, with the Tennessee Regulatory Authority (TRA) (may be required for collection systems and land application treatment systems)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A			
If the applicant listed above does not yet own the facility/site or if the applicant will not be the operator, explain how and when the ownership will be transferred or describe the contractual arrangement and renewal terms of the contract for operations. <b>TENNESSEE WASTEWATER SYSTEMS INC., WILL BE DEEDED THE PROPERTY WHEN THE FINAL SUBDIVISION PLAT IS RECORDED</b>			
<b>Complete the following information explaining the entity type, number of design units, and daily design wastewater flow:</b>			
<u>Entity Type</u>	<u>Number of Design Units</u>		<u>Flow (gpd)</u>
<input type="checkbox"/> City, town or county	No. of connections:		
<input checked="" type="checkbox"/> Subdivision	No. of homes: <b>83</b>	Avg. No. bedrooms per home:	<b>25,000-gpd</b>
<input type="checkbox"/> School	No. of students:	Size of cafeteria(s): No. of showers:	
<input type="checkbox"/> Apartment	No. of units:	No. units with Washer/Dryer hookups: No. units without W/D hookups:	
<input type="checkbox"/> Commercial Business	No. of employees:	Type of business:	
<input type="checkbox"/> Industry	No. of employees:	Product(s) manufactured:	
<input type="checkbox"/> Resort	No. of units:		
<input type="checkbox"/> Camp	No. of hookups:		
<input type="checkbox"/> RV Park	No. of hookups:	No. of dump stations:	
<input type="checkbox"/> Car Wash	No. of bays:		
<input type="checkbox"/> Other			
Describe the type and frequency of activities that result in wastewater generation.			

<b>Engineering Report (required for collection systems and/or land application treatment systems):</b>	<input checked="" type="checkbox"/> N/A
<input checked="" type="checkbox"/> Prepared in accordance with Rule 0400-40-05-.03 and Section 1.2 of the State of Tennessee <u>Design Criteria for Sewage Works</u> <input type="checkbox"/> Attached, or <input type="checkbox"/> Previously submitted and entitled: _____ Approved? <input type="checkbox"/> Yes. Date: _____ <input type="checkbox"/> No Operation and Maintenance Inspection Schedule Submitted: _____ Approved? <input type="checkbox"/> Yes. Date: _____ <input type="checkbox"/> No	

<b>Wastewater Collection System:</b>	<input type="checkbox"/> N/A	
System type (i.e., gravity, low pressure, vacuum, combination, etc.): <u>WATERTIGHT SEPTIC TANK EFFLUENT COLLECTION (S.T.E.P./S.T.E.G.)</u>		
System Description: <u>WATERTIGHT SEPTIC TANK EFFLUENT COLLECTION, 3" DIAMETER SDR 21 PVC FORCEMAIN PIPE &amp; REQUIRED FITTINGS</u>		
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): <u>STEP TANKS HAVE MINIMUM 24-36 HOURS MIN STORAGE. HEAVY RAINS HAVE MINIMAL IMPACT ON WATERTIGHT STEP TANKS AND COLLECTION SYSTEM. EMERGENCY GENERATORS CAN POWER PUMPS AS NECESSARY.</u>		
In the event of a system failure describe means of operator notification: <u>WEB-BASED TELEMTRY</u>		
List the <b>emergency</b> contact(s) (name/phone): <u>BILLY DRANES 615-220-7200</u>		
For low-pressure systems, who is responsible for maintenance of STEP/STEG tanks and pumps or grinder pumps (list all contact information)? <u>ADENUS OPERATIONS 849 AVIATION PKWY SMYRNA TN 37167 615-220-7200</u>		
Approximate length of sewer (excluding private service lateral): _____		
Number/hp of lift stations: _____ /	Number/hp of lift pumps _____ /	
Number/volume of low pressure and or grinder pump tanks _____	83 / 1,500	
Number/volume septic tanks _____	/	
Attach a schematic of the collection system. <input checked="" type="checkbox"/> Attached		
If this is a satellite sewer and you are tying in to another sewer system complete the following section, listing tie-in points to the sewer system and their location (attach additional sheets as necessary):		
<u>Tie-in Point</u>	<u>Latitude (xx.xxxx°)</u>	<u>Longitude (xx.xxxx°)</u>
N/A		

<b>Land Application Treatment System:</b>	<input type="checkbox"/> N/A
Type of Land Application Treatment System: <input checked="" type="checkbox"/> Drip <input type="checkbox"/> Spray <input type="checkbox"/> Other, explain:	
Type of treatment facility preceding land application (recirculating media filters, lagoons, other, etc.):	
Attach a treatment schematic. <input checked="" type="checkbox"/> Attached	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.):	HEAVY RAINS HAVE MINIMAL IMPACT ON WATERTIGHT TREATMENT MODULES, TANKS, AND COLLECTION SYSTEM. EMERGENCY GENERATORS CAN POWER PUMPS AS NECESSARY.
For New or Modified Projects:	
Name of Developer for the project:	PARTNERS IN BUILDING - CLAY LANE (DIVISION LAND MANAGER)
Developer address and phone number:	8119 ISABELLA LN SUITE 103, BRENTWOOD TN 37027 615-486-4006
For land application, list: Proposed acreage involved:	6-ACRES (3-ACRES PRIMARY + 3-ACRES RESERVE)
Inches/week gpd/sq.ft loading rate to be applied:	2.25 IN/WEEK ; 0.200-GPD/SQFT
Is wastewater disinfection proposed?	
<input checked="" type="checkbox"/> Yes Describe land application area access:	DRIP FIELD MUST BE FENCED WITH SIGNAGE PER WILLIAMSON COUNTY ZONING ORDINANCE
<input type="checkbox"/> No Describe how access to the land application area will be restricted:	
<b>Attach required additional Engineering Report Information (see <a href="#">website</a> for more information)</b>	
<input checked="" type="checkbox"/> Topographic map (1:24,000 scale presented at a six inch by six inch minimum size) showing the location of the project including quadrangle(s) name(s) GPS coordinates, and latitude and longitude in decimal degrees should also be included.	
<input checked="" type="checkbox"/> Scaled layout of facility showing the following: lots, buildings, etc. being served, the wastewater collection system routes, the pretreatment system location, the proposed land application area(s), roads, property boundaries, and sensitive areas such as streams, lakes, springs, wells, wellhead protection areas, sinkholes and wetlands.	
<input checked="" type="checkbox"/> Soils information for the proposed land disposal area in the form of a Water Resources Soils Map per Chapter 16 and 17 State of Tennessee Design Criteria for Sewage Work. The soils information should include soil depth (borings to a minimum of 4 feet or refusal) and soil profile description for each soil mapped.	
<input checked="" type="checkbox"/> Topographic map of the area where the wastewater is to be land applied with no greater than ten foot contours presented at a minimum size of 24 inches by 24 inches.	
<input checked="" type="checkbox"/> Describe alternative application methods based on the following priority rating: (1) connection to a municipal/public sewer system, (2) connection to a conventional subsurface disposal system as regulated by the Division of Groundwater Protection, and/or (3) land application.	

<b>For Drip Dispersal Systems Only: Unless otherwise determined by the Department, sewage treatment effluent wells, i.e, large capacity treatment/drip dispersal systems after approval of the SOP Application, will be issued an UIC tracking number and will be authorized as Permit by Rule per UIC Rule 0400-45-06-.14(2) and upon issue of a State Operating Permit and Sewage System Construction Approval by the Department. Describe the following:</b>	<input type="checkbox"/> N/A
---	------------------------------

The area of review (AOR) for each Drip Dispersal System shall, unless otherwise specified by the Department, consist of the area lying within a one mile radius or an area defined by using calculations under 0400-45-06-.09 of the Drip Dispersal System site or facility, and shall include, but not be limited to general surface geographic features, general subsurface geology, and general demographic and cultural features within the area. Attach to this part of the application a general characterization of the AOR, including the following: (This can be in narrative form)

- ☒ A general description of all past and present groundwater uses as well as the general groundwater flow direction and general water quality.
- ☒ A general description of the population and cultural development within the AOR (i.e. agricultural, commercial, residential or mixed)
- ☒ Nature of injected fluid to include physical, chemical, biological or radiological characteristics.
- ☒ If groundwater is used for drinking water within the area of review, then identify and locate on a topographic map all groundwater withdrawal points within the AOR, which supply public or private drinking water systems. Or supply map showing general location of publicly supplied water for the area (this can be obtained from the water provider)
- ☐ If the proposed system is located within a wellhead protection area or source water protection area designated by Rule 0400-45-01-.34, show the boundary of the protection area on the facility site plan.
- ☒ Description of system, Volume of injected fluid in gallons per day based upon design flow, including any monitoring wells
- ☒ Nature and type of system, including installed dimensions of wells and construction materials

<b>Pump and Haul:</b>	<input checked="" type="checkbox"/> N/A
Reason system cannot be served by public sewer:	
Distance to the nearest manhole where public sewer service is available:	
When sewer service will be available:	
Volume of holding tank:                      gal.	
Tennessee licensed septage hauler (attach copy of agreement):	
Facility accepting the septage (attach copy of acceptance letter):	
Latitude and Longitude (in decimal degrees) of approved manhole for discharge of septage:	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.):	



<b>Holding Ponds (for non-domestic wastewater only):</b>	<input checked="" type="checkbox"/> N/A
Pond use: <input type="checkbox"/> Recirculation <input type="checkbox"/> Sedimentation <input type="checkbox"/> Cooling <input type="checkbox"/> Other (describe):	
Describe pond use and operation:	
If the pond(s) are existing pond(s), what was the previous use?	
Have you prepared a plan to dispose of rainfall in excess of evaporation? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe disposal plan:	
Is the pond ever dewatered? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe the purpose for dewatering and procedures for disposal of wastewater and/or sludge:	
Is(are) the pond(s) aerated? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Volume of pond(s):	gal. Dimensions:
Is the pond lined (Note if this is a new pond system it must be lined for SOP coverage. Otherwise, you must apply for an Underground Injection Control permit.)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Describe the liner material (if soil liner is used give the compaction specifications):	
Is there an emergency overflow structure? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide a design drawing of structure.</i>	
Are monitoring wells or lysimeters installed near or around the pond(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide location information and describe monitoring protocols (attach additional sheets as necessary):</i>	

<b>Mobile Wash Operations:</b>		<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> Individual Operator <input type="checkbox"/> Fleet Operation Operator		
<b>Indicate the type of equipment, vehicle, or structure to be washed during normal operations (check all that apply):</b>		
<input type="checkbox"/> Cars <input type="checkbox"/> Trucks <input type="checkbox"/> Trailers (Interior washing of dump-trailers, or tanks, is prohibited.) <input type="checkbox"/> Other (describe):	<input type="checkbox"/> Parking Lot(s):      sq. ft. <input type="checkbox"/> Windows:      sq. ft. <input type="checkbox"/> Structures (describe):	
<b>Wash operations take place at (check all that apply):</b>		
<input type="checkbox"/> Car sales lot(s) <input type="checkbox"/> Private industry lot(s) <input type="checkbox"/> County(ies), list:	<input type="checkbox"/> Public parking lot(s) <input type="checkbox"/> Private property(ies) <input type="checkbox"/> Statewide	
<b>Wash equipment description:</b>		
<input type="checkbox"/> Truck mounted <input type="checkbox"/> Rinse tank size(s) (gal.): <input type="checkbox"/> Collection tank size(s) (gal.):	<input type="checkbox"/> Trailer mounted <input type="checkbox"/> Mixed tanks size(s) (gal.): Number of tanks per vehicle:	
Pressure washer:      psi (rated)      gpm (rated) <input type="checkbox"/> gas powered <input type="checkbox"/> electric		
Vacuum system manufacturer/model:		Vacuum system capacity:      inches Hg
Describe any other method or system used to contain and collect wastewater:		
List the public sewer system where you are permitted or have written permission to discharge waste wash water (include a copy of the permit or permission letter):		
Are chemicals pre-mixed, prior to arriving at wash location? <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Describe all soaps, detergents, or other chemicals used in the wash operation (attach additional sheets as necessary):</b>		
Chemical name:	Manufacturer:	Primary CAS No. or Product No.

**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**  
**INSTRUCTIONS**

Purpose of this form A completed SOP application must be submitted to obtain SOP coverage. This permit is required to operate a sewage, industrial waste or other waste collection and/or treatment system that does not have a point source discharge to any surface or subsurface waters. This form must be submitted at least 180 days before starting any new activity, before an existing permit expires, or when renewing a permit.

Complete the form Type or print clearly, using black or blue ink; not markers or pencil. Answer each item or enter "N/A," for not applicable. If you need additional space, attach a separate piece of paper to the SOP application. Applicants may be required to submit engineering reports, plans and specifications. Contact the division for the applicable items, or refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information. **The application will be considered incomplete without supplying all of the required information, Engineering Reports, and an original signature.**

Permittee Identification/Facility Identification Describe and locate the project, use the legal or official name of the facility or site. Provide the latitude and longitude (expressed in decimal degrees) of the center of the site, which can be located on USGS quadrangle maps. The quadrangle maps can be obtained at 1-800-USA-MAPS, or at the Census Bureau world wide web site: <http://www.census.gov/cgi-bin/gazetteer>. Attach a copy of a portion of a 7.5 minute quad map, showing location of site, with boundaries at least one mile outside the site boundaries. If business is mobile give the owner of operations' home, or business office address, and list all current areas of operation by city and county.

Wastewater Collection System These types of systems require engineering reports, refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information.

Land Application Treatment System These types of systems require engineering reports, refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information. Public access to the treatment area must be restricted, if disinfection is not part of the treatment. Applicants completing this section of the application must also complete the Wastewater Collection System section.

Pump and Haul These types of systems may require engineering reports, refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information.

Holding Ponds Given that annual rainfall onto open ponds exceeds annual evaporation (in Tennessee), the permittee must develop a written plan (to be retained on site and be available to the division upon request) that addresses how excess rainfall will be disposed of in compliance with the no discharge requirement of this permit. Treatment ponds are not to be used for stormwater treatment or storage. All new and existing point source industrial stormwater discharges associated with industrial activity require coverage under the



**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**  
**INSTRUCTIONS - CONTINUED**

Tennessee industrial stormwater multi-sector general permit TMSP, refer to the [website](#) for more information. Describe the system for re-routing surface runoff away from ponds in the rainfall disposal plan.

Mobile Wash Operations Indicate whether the operation is run by an individual or a corporation with a fleet of vehicles equipped to wash and collect waste waters. If a corporation, indicate the home office as the "Official Contact". Indicate if operations take place at specific sites and list those counties that apply. Note that this permit covers operations for all of Tennessee. Operations indicated as "statewide" generally apply as a fleet type operation and each office location shall be individually permitted. Equipment may be truck or trailer-mounted, or both, indicate all that applies. Soaps, detergents, and other chemicals used should be non-toxic and biodegradable. All "chemically enhanced" (soaps, detergents, and other chemicals) waste-wash waters must be collected for proper disposal. If no chemically enhanced washwaters are used, clear-wash waters may travel by sheet flow to a gravel or grassy area where there is no opportunity to enter waters of the state. There should be no discharge to a storm water inlet, ditch, conveyance, stream, etc. If you are unsure of your wash area drainage, contact the area Environmental Field Office (EFO) prior to setting up your wash operation.

Fees Refer to the TDEC-DWR Environmental Protection Fund Fee Rule 0400-40-11-.02. Links to publications are available on Department of Environment and Conservation, Division of Water Resources webpage and the webpage for the Tennessee Secretary of State.

Submitting the form and obtaining more information Note that this form must be signed by the chief executive officer, owner, or highest ranking elected official. For more information, contact your local EFO at the toll-free number 1-888-891-8332 (TDEC). Submit a complete application electronically to [water.permits@tn.gov](mailto:water.permits@tn.gov) (preferred) or to the appropriate EFO for the county(ies) where the facility is located, addressed to **Attention: DWR, Permit Section**. Please keep a copy for your records.

EFO	Street Address	Zip Code	EFO	Street Address	Zip Code
Memphis	8383 Wolf Lake Drive, Bartlett	38133	Cookeville	1221 South Willow Ave.	38506
Jackson	1625 Hollywood Dr	38305-4316	Chattanooga	1301 Riverfront Parkway Suite 206	37402
Nashville	711 R S Gass Boulevard	37243	Knoxville	3711 Middlebrook Pike	37921
Columbia	1421 Hampshire Pike	38401	Johnson City	2305 Silverdale Road	37601

**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**  
**INSTRUCTIONS - CONTINUED**

Upon receipt of the required items, the division conducts a review of the material, and the applicant is notified of any deficiencies. When all the deficiencies have been corrected, the division makes a determination of whether to publish a draft permit. When a draft permit is generated, a public notice is issued and published in a local newspaper. The draft permit is then reviewed by the applicant, and division field staff. The general public also has an opportunity to review the permit. Based on public response, a public hearing may be held. After considering public comments and a final review, the permit may be issued. The entire process normally takes from five (5) to nine (9) months. Permits are normally valid for five (5) years, except those for pump and haul systems, which are generally valid for one (1) year.

The division has the right to inspect a facility when deemed necessary. In addition, the division has the right to revoke or suspend any permit for violation of permit conditions or any other provisions of the Tennessee Water Quality Control Act and other water pollution control rules.

The division is responsible for regulating any activity, which involves a potential discharge in order to protect waters of the State from pollution and to maintain the highest possible standards in water quality.

EX. 20

STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
WATER AND WASTEWATER OPERATOR CERTIFICATION BOARD

I.D. NO.

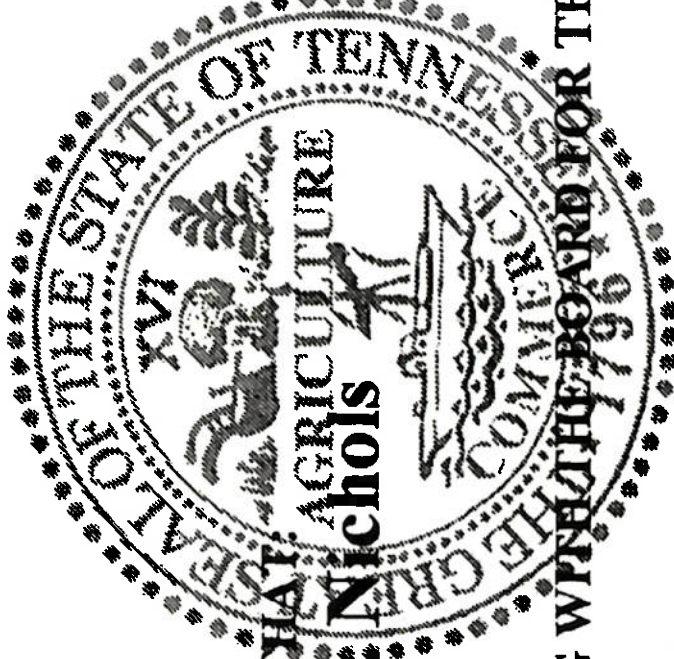
15046

EXPIRATION DATE

12/31/2023

THIS IS TO CERTIFY THAT

Tracy A. Nichols



IS IN GOOD STANDING WITH THE BOARD FOR THE CLASSIFICATIONS  
LISTED:

BNS, CS2

**CONFIDENTIAL EXHIBIT 23A**

**CONFIDENTIAL EXHIBIT 23B**

**CONFIDENTIAL EXHIBIT 23C**

**CONFIDENTIAL EXHIBIT 25**

**CONFIDENTIAL EXHIBIT 26**



**CONFIDENTIAL EXHIBIT 28**

Tennessee Wastewater Systems, Inc.

T.R.A. No. 2

Section 1

Seventh Revised Page 2

**WASTEWATER UTILITY SERVICE****CHECK SHEET**

Sheets of this tariff are effective as of the date shown at the bottom of the respective sheet(s). Original and revised sheets as named below comprise all changes from the original tariff and are currently in effect as of the date on the bottom of this sheet.

SECTION	SHEET	REVISION	SECTION	SHEET	REVISION
1	1	Original	4	1	Sixth Revised
1	2	Eighth Revised*	5	1	Original
1	3	Original	5	2	Original
1	4	Original	5	3	Original
1	5	Original	5	4	Original
1	6	Original	5	5	Fourth Revised
1	7	Original	6	1	Third Revised
1	8	Original	6	2	Original
2	1	Original	6	3	Third Revised
2	2	Original	6	4	Original
2	3	Original	6	5	Third Revised
2	4	Original			
2	5	Original			
2	6	Original			
2	7	Original			
2	8	Original			
2	9	Original			
3	1	Original			
3	2	Original			
3	3	Original			
3	4	Original			
3	5	Original			
3	6	Fourth Revised*			

Issued: July 24, 2023

Effective: August 23, 2023

Issued by: Matthew Nicks, President

Tennessee Wastewater Systems, Inc.

TPUC No. 2

Section 3

Fourth Revised Page 6

**WASTEWATER UTILITY SERVICE**

<u>Service Territory</u>	<u>County</u>	<u>TPUC Docket #</u>	<u>Rate Class</u>
Smokey Mountain Reflections RV Park	Sevier	07-00235	RATE CLASS 1
Milky Way Farms	Giles	08-00029	RATE CLASS 1
Preserve Condominiums	DeKalb	08-00113	RATE CLASS 1
Tarpley Shop Utility District	Giles	08-00161	RATE CLASS 5
Lakeside Meadows	Monroe	08-00162	RATE CLASS 1
Fairway Vistas	Blount	08-00163	RATE CLASS 1
Saddle Ridge	Monroe	08-00209	RATE CLASS 1
Scenic River	Monroe	09-00006	RATE CLASS 1
Preserve at Eagle Rock	Hamblen	09-00007	RATE CLASS 1
Bluff at Bradbury Farms	Montgomery	11-00155	RATE CLASS 1
Scales Project	Williamson	14-00006	RATE CLASS 1
Clovercroft Farms/Clovercroft Wells TF			
Clovercroft Preserve	Williamson	14-00062	RATE CLASS 1
Clovercroft Acres/Clovercroft Tulloss TF			
Enclave at Dove Lake	Williamson	15-00025	RATE CLASS 1
Lighthouse Pointe	Grainger	17-00146	RATE CLASS 1
Warrioto Hills	Montgomery	18-00107	RATE CLASS 1
Chelsea's Way	Robertson	19-00030	RATE CLASS 1
Oak Plains	Montgomery	21-00075	RATE CLASS 1
The Pointe	Clay	21-00026	RATE CLASS 1
Derby Meadows	Robertson	22-00074	RATE CLASS 1
Lake Haven	Jefferson	22-00134	RATE CLASS 1
Hilltop Ridge	Montgomery	22-00133	RATE CLASS 1
Meadowside	Williamson	22-00139	RATE CLASS 1
Wylea Subdivision	Williamson	23-00073	RATE CLASS 1
Mosely Farm	Williamson	XX-XXXXX	RATE CLASS 1 (T)

**Issued:****Effective:****Issued By: Matthew Nicks, President**

**WASTEWATER UTILITY SERVICE****SECTION 4 – RESIDENTIAL RATES SHEET**

	<b>Base</b>	<b>Escrow</b>	<b>Bonding</b>	<b>Environmental Rider (D)</b>	<b>Total</b>
<b>Rate Class 1</b>	\$ 40.48	\$ 7.27	\$0.12 (R)	\$0.00	\$ 47.87(R)
<b>Rate Class 2</b>	\$ 40.48	\$ 7.27	\$0.12 (R)	\$0.00	\$ 47.87(R)
<b>Rate Class 5</b>	\$ 36.66	\$ 5.69	\$0.12 (R)	\$0.00	\$ 42.47(R)
<b>Rate Class 6</b>	\$ 36.66	\$ 5.69	\$0.12 (R)	\$0.00	\$ 42.47(R)
<b>Rate Class 9</b>	\$ 20.55	\$ 3.39	\$0.12 (R)	\$0.00	\$ 24.06*(R)

\* Southridge customers will have a pass-through treatment cost assessed to their monthly bill. The pass-through treatment cost is calculated using the water meter readings as provided to TWSI by the East Montgomery Water Co. and the multiplier charged to TWSI by Clarksville Gas and Water to provide wastewater treatment. This cost will be filed annually with TPUC in June and effective upon approval. The current pass through treatment cost is 0.0096296082 per gallon.

\*\* Each condominium unit will be billed as a residential customer and be individually billed.

\*\*\* Customers in the City of Coopertown will be billed a 3% franchise fee (applied to the base rate only).

\*\*\*\* The bonding fee will be updated with an annual filing with TPUC in August and effective upon approval.

**Fees:**

Non-Payment – 5% of total bill amount

Disconnection – \$40

Reconnection – \$50

Returned Check (NSF Fee) – \$25

Returned ACH - \$25

Capacity Reservation Fee – \$10 per month (See Rules and Regulations for Explanation)

Credit Card Convenience Fee: 2.45% with a \$1.25 minimum fee (R)(N)

City of Coopertown Franchise Fees: 3%

**Issued: December 13, 2022**

**Effective: December 13,  
2022**

**Issued by: Matthew Nicks, President**

**CONFIDENTIAL EXHIBIT 31**