

STATE OF TENNESSEE

Office of the Attorney General



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24-00044

24-00020

23-00036

July 23, 2025

Chairman David Jones
c/o Ms. Tory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37242-0001

Electronically Filed in TPUC Docket
Room on July 23, 2025 at 1:44 p.m.

In Re: TPUC Docket No. 24-00044 Limestone Rate Case - Grasslands; TPUC Docket No. 23-00036 Nash Ridge CCN; and TPUC Docket No. 24-00020 Adley Subd CCN.

Dear Chairman Jones:

On July 16, 2025, the Tennessee Department of Environment and Conservation ("TDEC") emailed Limestone regarding the SOP for the Grassland system.¹ The Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") has reviewed the email and determined that the notice of the incomplete application needed to be filed with the Commission due to the impact that the incomplete plans have on multiple TPUC dockets with Limestone.

The Consumer Advocate respectfully request that this letter and exhibit be filed in the three referenced TPUC Docket Nos: 24-00044, 24-00020, and 23-00036.

Sincerely,

A handwritten signature in blue ink that reads "Karen H Stachowski".

Karen H. Stachowski
Deputy Attorney General

cc: Melvin Malone

¹ Attached as Consumer Advocate Exhibit 1.

Wade Murphy

From: Wade Murphy
Sent: Wednesday, July 16, 2025 3:49 PM
To: logan.dickinson
Subject: Application for Limestone Grasslands; TN0027278; Williamson County

Good afternoon, Logan. I've reviewed the revised application this afternoon and I have some needs and questions. I'll list them here and then we can discuss them.

- Mr. Freeman will need to sign and date the form on numbered Page 12 (Page 17 of 41 of the pdf).
- The form needs to complete all fields except when the instructions say to "skip to #". Don't leave us to guess the answers. This is mostly as simple as checking yes and no boxes.
- Now the process flow diagram shows that the average daily flow is 0.23 for all units and peak flows are 0.60 and 0.45. So, is the design not increasing the average flow to 0.45 MGD?
- I will still need Engineering Services acceptance of the engineering before I can officially deem the application complete.

I will need some time to complete my analysis of the de minimis argument, but I anticipate that I can easily conclude de minimis with Franklin adding flow upstream of Limestone's location.

Thanks.



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