

BUTLER | SNOW

November 1, 2024

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket Room
on November 1, 2024 at 5:21 p.m.

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

**RE: *Joint Application of Limestone Water Utility Operating Company, LLC, and
Bridget J. Willhite, as Administrator CTA of the Estate of Glenna Newport, for
Approval of the Acquisition of and to Operate the Newport Resort Water System,
and to Transfer or Issue a Certificate of Public Convenience and Necessity, TPUC
Docket No. 24-00034***

Dear Chairman Jones:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Request for Suspension of Procedural Schedule* in the above-referenced docket.

As required, the original plus four (4) hard copies will follow. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Sincerely,

BUTLER SNOW LLP



Katherine Barnes

clw

Attachment

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
 Bridget J. Willhite, Esq.
 Carol Ann Barron, Esq.
 Shilina B. Brown, Consumer Advocate Division
 Vance Broemel, Consumer Advocate Division

*The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201*

KATHERINE B. BARNES
615.651.6797
katherine.barnes@butlersnow.com

*T 615.651.6700
F 615.651.6701
www.butlersnow.com*

BUTLER SNOW LLP

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

IN RE:)	
)	
JOINT APPLICATION OF LIMESTONE)	
WATER UTILITY OPERATING)	
COMPANY, LLC, AND BRIDGET J.)	
WILLHITE, AS ADMINISTRATOR CTA)	
OF THE ESTATE OF GLENNA)	DOCKET NO. 24-00034
NEWPORT, FOR APPROVAL OF THE)	
ACQUISITION OF AND TO OPERATE)	
THE NEWPORT RESORT WATER)	
SYSTEM, AND TO TRANSFER OR)	
ISSUE A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

REQUEST FOR SUSPENSION OF PROCEDURAL SCHEDULE

Limestone Water Utility Operating Company, LLC ("Limestone") hereby requests the Tennessee Public Utility Commission ("TPUC" or "Commission") grant a 60-day suspension to the procedural schedule in the above-captioned matter. This matter is currently set for hearing on December 16, 2024. The parties include Limestone, the Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate"), Bridget J. Willhite, as Administrator CTA of the Estate of Glenna Newport ("Newport Estate"), and Intervenor Rhea County and North Utility District of Rhea County (collectively, "Rhea County"). The parties are involved in productive, ongoing discussions towards resolution of this matter. However, the parties do not anticipate that these discussions will be finalized by the dates included in the current Order Establishing Amended Procedural Schedule.¹ Therefore, Limestone is requesting a 60-day suspension of the procedural schedule to allow continuing discussions amongst the parties in

¹ *Order Establishing Amended Procedural Schedule*, TPUC Docket No. 24-00034 (Oct. 23, 2024).

furtherance of their good faith efforts to finalize a mutually satisfactory resolution. The Consumer Advocate, Newport Estate, and Rhea County have all communicated to Limestone that they do not oppose a suspension.

Respectfully submitted,



Melvin Malone
Katherine Barnes
Butler Snow LLP
The Pinnacle at Symphony Place
150 Third Avenue South, Suite 1600
Nashville, TN 37201
Office: (615) 651-6700
Melvin.Malone@butlersnow.com
Katherine.Barnes@butlersnow.com

Russ Mitten
Central States Water Resources, Inc.
1630 Des Peres Rd., Suite 140
Des Peres, MO 63131
dwoodsmall@cswrgroup.com

*Attorneys for Applicant Limestone Water Utility
Operating Company, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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

Victoria B. Glover, Esq.
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Victoria.Glover@ag.tn.gov

Bridget J. Willhite, Esq.
Willhite & Mitchell, PLLC
P.O. Box 885
Athens, TN 37371-0885
bridget@wmlawfirm.net A
Administrator CTA for Estate of Glenna Newport, Deceased

Carol Ann Barron, Esq.
264 Third Avenue
Dayton, TN 37321
barroncarolann@aol.com
Rhea County Attorney and Attorney for NUDRC

This the 1st day of November, 2024.



Katherine Barnes