

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

**IN RE:** )  
)  
**JOINT APPLICATION OF LIMESTONE** )  
**WATER UTILITY OPERATING** )  
**COMPANY, LLC, AND BRIDGET J.** )  
**WILHITE, 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** )

**DOCKET NO. 24-00034**

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**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS  
TO LIMESTONE WATER UTILITY OPERATING COMPANY, LLC**

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Pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11, the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, propounds the following discovery requests to Limestone Water Utility Operating Company, LLC (“Limestone” or the “Company”).

The Company shall serve full and complete responses in accordance with the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Victoria B. Glover, on or before 2:00pm (Central Time), July 10, 2024. The Preliminary Matters and Definitions set forth in the Consumer Advocate’s First Set of Discovery Requests are hereby incorporated by reference as if fully restated herein.

**SECOND SET OF DISCOVERY REQUESTS**

- 2-1.** Source & Support. Refer to Exhibit 14, provide both the basis and the supporting detail behind the Company's proposed \$92,100 in Plant, Property, and Equipment balance as shown in Year 1 on the Pro Forma Balance Sheet.

**RESPONSE:**

- 2-2.** Source & Support. Refer to Exhibits 14 and 16. The Consumer Advocate notes that Exhibit 16 only shows a \$5,000 addition to account 353 – Land & Land Rights as a result of this acquisition; however, Exhibit 14 shows the Company projects a plant in service value of \$92,100 in the year following acquisition. Reconcile these amounts.

**RESPONSE:**

- 2-3.** Source & Support. Provide the amount of Accumulated Depreciation that the Company proposes to book as a result of this transaction.

**RESPONSE:**

- 2-4.** Source & Support. Refer to Exhibit 9, the Direct Testimony of Josiah Cox. Specifically refer to page 14, lines 10-11. Refer also to Newport Resorts' Response to Consumer Advocate DR No. 1-1, Exhibit D, Tennessee Department of Environment and Conservation Sanitary Survey. Reconcile the number of connections and the estimated population within Mr. Cox's testimony with the number of connections and estimated population contained within the Sanitary Survey.

**RESPONSE:**

*In re: Limestone / Newport Resort*

TPUC Docket No. 24-00034

Consumer Advocate's Second Set of Discovery Requests to Limestone/CSWR

**RESPECTFULLY SUBMITTED,**



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Consumer Advocate's Second Set of Discovery Requests to Limestone/CSWR

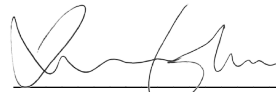
**CERTIFICATE OF SERVICE**

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

Melvin Malone  
Katherine Barnes  
Butler Snow LLP  
The Pinnacle at Symphony Place  
150 Third Avenue South, Suite 1600  
Nashville, TN 37201  
Phone: (615) 651-6700  
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Cumberland Basin Wastewater Systems, LLC  
c/o Tim Huddleston  
150 Construction Drive  
Livingston, TN 38570  
Phone: (931) 403-1000  
Email: [thuddleston@wocc.com](mailto:thuddleston@wocc.com)

On this the 3<sup>rd</sup> day of July, 2024.

  
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VICTORIA B. GLOVER  
Assistant Attorney General