

**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

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO BRIDGET J. WILHITE**

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 Bridget J. Wilhite, as Administrator CTA of the Estate of Glenna Newport (“Bridget Wilhite” or the “Seller”).

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. Provide the date that the Water System was placed into service.

RESPONSE:

2-2. Source & Support. Refer to the Newport Resort Response to Consumer Advocate DR No.

1-1. Specifically, refer to Exhibit D, Tennessee Department of Environment and Conservation ("TDEC") Sanitary Survey as filed in the response and provide answers to the following:

- a. Refer to marked Section 6, Subsection A, Adequate Storage. Has Newport Resort provided a response to the deficiency noted by TDEC regarding this subsection? If yes, provide the response.
- b. Refer to marked Section 6, Subsection B, Inspection and Maintenance of Reservoirs, Tank and Clearwell. Has Newport Resort provided a response to the deficiency noted by TDEC regarding this subsection? If yes, provide the response.
- c. Refer to marked Section 7, Subsection E, Map of Distribution System. Has the Newport Resort provided a response to the deficiency noted by TDEC regarding this subsection? If yes, provide the response.

RESPONSE:

2-3. Explanation. Refer to the Newport Resort's Response to Discovery Request No. 1-5.

Confirm that the Newport Resort will transfer the referenced customer deposits as a part of this transaction.

RESPONSE:

2-4. Source & Support. Provide the date and amount of any capital investments for the system.

RESPONSE:

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2-5. Explanation. Refer to the Newport Resort's Response to Consumer Advocate DR No. 1-

3. Confirm there have been no Financial Statements since the inception of the system; if not confirmed provide the most recent financial statement available.

RESPONSE:

RESPECTFULLY SUBMITTED,



VICTORIA B. GLOVER (BPR No. 037954)

Assistant Attorney General

SHILINA B. BROWN (BPR No. 020689)

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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
Email: Melvin.Malone@butlersnow.com
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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

On this the 3rd day of July, 2024.



VICTORIA B. GLOVER
Assistant Attorney General