

November 8, 2024

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VIA ELECTRONIC FILING

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: *Petition of Limestone Water Utility Operating Company, LLC to Increase Charges, Fees and Rates and for Approval of a General Rate Increase and Consolidated Rates, TPUC Docket No. 24-00044*

Dear Chairman Jones:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Supplemental Response DR 1-42 of the First Set of Discovery Requests of the Consumer Advocate* in the above-captioned matter. This Supplemental Response contains the remainder of the relevant invoices referenced in Response 1-42.b.

Please note that the *Supplemental Response DR 1-42 Attachments* contain **CONFIDENTIAL INFORMATION** and are being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of these response attachments are attached.

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

Attachments

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Victoria B. Glover, Consumer Advocate Division
Shilina B. Brown, Consumer Advocate Division

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BUTLER SNOW LLP

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

**PETITION OF LIMESTONE WATER)
UTILITY OPERATING COMPANY,)
LLC TO INCREASE CHARGES, FEES)
AND RATES AND FOR APPROVAL)
OF A GENERAL RATE INCREASE)
AND CONSOLIDATED RATES)**

DOCKET NO. 24-00044

**LIMESTONE WATER UTILITY OPERATING COMPANY, LLC’S
SUPPLEMENTAL RESPONSE TO DR 1-42 OF THE
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Limestone Water Utility Operating Company, LLC (“Limestone”), by and through counsel, hereby submits its Supplemental Response to DR 1-42 of the First Set of Discovery Requests propounded by the Consumer Advocate Division of the Attorney General’s Office (“Consumer Advocate” or “CAD”).

GENERAL OBJECTIONS

1. Limestone objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.

2. Limestone objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission (“TPUC”).

3. The specific responses set forth below are based on information now available to Limestone, and Limestone reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. Limestone objects to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. Limestone objects to each request to the extent it seeks information outside Limestone's custody or control.

6. Limestone's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of Limestone's General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. Limestone objects to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.

8. Limestone objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. Limestone does not waive any previously submitted objections to the Consumer Advocate's discovery requests.

SUPPLEMENTAL RESPONSE TO FIRST SET OF DISCOVERY REQUESTS

1-42. What record(s) does Limestone keep regarding the costs associated with the addition of new customers and capital improvement projects?

- a. Does such record(s) include soil information and line length; and
- b. Provide all copies of these records containing such information.

RESPONSE: Limestone retains all invoices related to the addition of new customers. Limestone also maintains a Purchase Order log for all capital improvement projects, including the associated Purchase Orders for each project.

- a. Limestone has not made any capital improvements regarding line extensions; therefore, no soil information or line length information can be provided.
- b. Limestone Water currently tracks the costs associated with adding new customers and implementing capital improvement projects through invoice records. These invoices contain itemized details of expenses incurred including labor, materials, and equipment. As of the date of this filing, Limestone Water has pulled and will provide a majority of the invoices related to both new customers and capital improvement projects. Due to the extensive nature of these records, not all invoices are being produced with this filing and Limestone will supplement the remainder of the relevant invoices by the week of 11/4/2024. Please refer to the Company's response to DR 53 for the total of Capital investment by Service Area.

SUPPLEMENTAL RESPONSE: Limestone is providing the remainder of the relevant invoices to DR 1-42 which are filed **UNDER SEAL** as **CONFIDENTIAL INFORMATION**.

RESPECTFULLY SUBMITTED,



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Company, LLC*

Limestone Water Utility Operating Company

Docket No. 24-00044

Limestone DR 42 – Invoices

CONFIDENTIAL

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:

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This the 8th day of November 2024.



Katherine Barnes