

STATE OF TENNESSEE

Office of the Attorney General



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January 27, 2025

Chairman David F. Jones
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deadrick Street, 4th Floor
Nashville, TN 37243
Tpuc.docketroom@tn.gov

Electronically Filed in TPUC Docket
Room on January 27, 2025 at 11:06 a.m.

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:

The Consumer Advocate submits these responses to Staff's discovery in the above-captioned matter. The responses include corrections to workpapers submitted by the Consumer Advocate's witness Alex Bradley and provide instruction on how to make corrections on the recently filed documents. The files with corrections that were provided in the Direct Testimony of Alex Bradley are <AB-1.1 Limestone Wastewater Consumer Advocate Revenue Requirement Schedules> and <AB-1.2 Limestone Water Consumer Advocate Revenue Requirement Schedules>.

The Consumer Advocate will file documents correcting these amounts as soon as our expert has completed his review and adopts Alex Bradley's Direct Testimony.

Thank you for your time and consideration of this matter. If you have any questions, please contact me at (615) 360-4219.

Respectfully,

A handwritten signature in black ink, appearing to read "Victoria B. Glover".

Victoria B. Glover
Assistant Attorney General

cc: All Parties of Record

IN RE:

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

CONSUMER ADVOCATE’S RESPONSES TO COMMISSION STAFF’S FIRST SET OF DISCOVERY REQUESTS

CONSUMER ADVOCATE'S RESPONSES

1-01. Refer to Excel files (a) AB-1.1 Limestone Wastewater Consumer Advocate Revenue Requirement Schedules.xls, worksheet ‘CompRateBase,’ cell L18 and (b) AB-1.2 Limestone Water Consumer Advocate Revenue Requirement Schedules.xls, worksheet ‘CompRateBase,’ cell L18. Next, refer to the table between lines 6 and 7 on page 13 of Clark D. Kaml’s confidential direct testimony filed on December 19, 2024. Provide a reconciliation between the proposed \$518,067 adjustment to Limestone’s wastewater-

related Land and Land Rights value per Excel file AB-1.1 Limestone Wastewater Consumer Advocate Revenue Requirement Schedules.xls and the adjustments per the table in Mr. Kaml's testimony on page 13.

RESPONSE:

Upon reviewing supporting workpapers and schedules, see file <AB-1.1 Limestone Wastewater Consumer Advocate Revenue Requirement Schedules>, tab "CompRateBase", the entry on cell L18 should be (\$543,901). Then in file <AB-1.2 Limestone Water Consumer Advocate Revenue Requirement Schedules>, tab "CompRateBase", cell L18 should be (\$133,458). These amounts are set forth within the file <Confidential CDK workfiles>, specifically tab "3.05 CDK Adjustments" (attached).

1-02. Provide a reconciliation between the proposed \$159,292 adjustment to Limestone's water-related Land and Land Rights value per Excel file AB-1.2 Limestone Water Consumer Advocate Revenue Requirement Schedules.xls and the adjustments per the table in Mr. Kaml's testimony on page 13.

RESPONSE:

See the Response to item 1.

RESPECTFULLY SUBMITTED,



VICTORIA B. GLOVER (BPR No. 037954)

Assistant Attorney General

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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 provided upon:

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This the 27th day of January, 2025.



VICTORIA B. GLOVER
Assistant Attorney General