

Office of the Attorney General



JONATHAN SKRMETTI
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615) 741-3491
FACSIMILE (615) 741-2009

January 28, 2025

Kelly Cashman-Grams
General Counsel
c/o Tory Lawless – Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on January 28, 2025 at 3:03 p.m.

Re: Records Request Related to *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 Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") respectfully requests the Tennessee Public Utility Commission ("TPUC") to furnish the following records which the Consumer Advocate believes TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced docket regarding the invoices Limestone provided in discovery. To obtain clear average amounts to compare to Limestone's, we are seeking records for 3 different utilities. The records requested are as follows:

1. Lawn Maintenance Invoices, staff approved annual budgets, and/or related information that were used in staff assisted rate cases for the following utilities:
 - a. TPUC Docket No. 20-00009, Tennessee Wastewater Services, Inc.;¹
 - b. TPUC Docket No. 22-00087, Superior Wastewater Systems, LLC;² and
 - c. TPUC Docket No. 24-00073, Integrated Resource Management, Inc.³

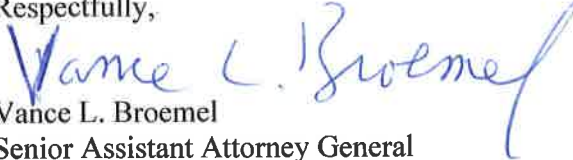
¹ *Joint Petition of Tennessee Wastewater Systems, Inc. and TPUC Staff (As a Party) to Increase Rates and Charges*, TPUC Docket No. 20-00009 (Jan. 23, 2020).

² *Joint Petition of Superior Wastewater Systems, LLC and Commission Staff as a Party to Increase Rates and Charges*, TPUC Docket No. 22-00087 (Sept. 6, 2022).

³ *Joint Petition of Integrated Resource Management, Inc. d/b/a IRM Utility, Inc., and Commission Staff as a Party to Increase Rates and Charges*, TPUC Docket No. 24-00073 (Oct.25, 2024).

The Consumer Advocate has filed an intervention in this docket. Thank you for your time and consideration of this matter. If you have questions regarding this request, please contact me at (615) 741-8733.

Respectfully,


Vance L. Broemel
Senior Assistant Attorney General

cc: All Parties of Record