

TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
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Nashville, TN 37243-0001

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January 31, 2025

Docket 24-00044

Victoria B. Glover
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
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sent via email

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

Dear Ms. Glover:

To assist the Commission in its continuing evaluation of this docket, please respond to the following requests for information:

1. Refer to Excel files (a) AB-1.1 Limestone Wastewater Consumer Advocate Revenue Requirement Schedules.xls, worksheet 'OpsResults' (cell L14) and (b) AB-1 Limestone Consolidated Revenue Requirements.xlsx, worksheet 'OpsResults' (cell L14) and worksheet 'Wastewater' (cell L14).

It appears the Consumer Advocate's rate base figure for its revenue deficiency calculation reflects the Company's unadjusted April 30, 2024 amounts, as opposed to the Consumer Advocate's proposed rate base value.

Please provide clarification on this observation. If the amounts referenced in the files and cells in the first paragraph above are in error, please provide corrected schedules that reflect the Consumer Advocate's proposed revenue deficiency calculation.

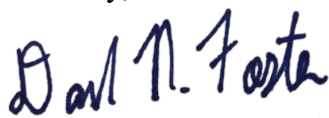
2. In the Consumer Advocate's response to Staff's first DR as issued on January 17, the Consumer Advocate did not provide revised revenue requirement schedules for its changes in rate base schedules. Please provide revised schedules that reflect the changes made by the Consumer Advocate in response to Staff's initial data request as issued on January 17.
3. Refer to Excel file WHN Revenue Analysis3 - Limestone 24-00044 Confidential.xlsx, worksheet 'Revenue Summary' (cells G40 and G42) and Table 2 on page 12 of Mr. Novak's testimony. Mr. Novak proposes a total of \$493,125 – which represents tap fees and inspection fees – be added to the Company's other revenues. In his testimony on pages 11-13, Mr. Novak argues that these charges have been incorrectly recorded by the Company as CIAC and should be reclassified as other revenue.

However, please refer to Excel files (a) AB-1.1 Limestone Wastewater Consumer Advocate Revenue Requirement Schedules.xls, worksheet 'CompRateBase' and (b) AB-1.2 Limestone Water Consumer Advocate Revenue Requirement Schedules.xls, worksheet 'CompRateBase. On these schedules, no corresponding adjustments have been made to reduce the Company's CIAC.

Please provide an explanation as to why an adjustment for tap and inspections fees was proposed to increase the Company's operating revenues, yet no corresponding entries were made to the Company's CIAC for sewer and water operations. If these omissions are in error, please provide revised schedules reflecting the Consumer Advocate's position.

It is requested that responses be provided no later than Friday, February 7, 2025. In accordance with the Commission's rules, please submit your response electronically to the Docket Manager at tpuc.docketroom@tn.gov with the original and four copies also mailed to the Docket Manager. Should you have questions or need clarification of this request, please contact me.

Sincerely,



David Foster, Director
Utilities Division

cc: Docket File
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