

TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

January 31, 2025

Electronically Filed in TPUC Docket
Room on January 31, 2025 at 1:28 p.m.

Melvin J. Malone
Butler Snow, LLP
150 3rd Avenue S, Suite 1600
Nashville, TN

Via email: Melvin.malone@butlersnow.com

In 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, Docket No. 24-00044*

Dear Mr. Malone:

In order to assist the Commission in its review and analysis of the above-referenced docket, it is requested that responses be provided to the attached, *Second Staff Data Request to Limestone Water Utility Operating Company, Docket No. 24-00044*.

Please provide all responses no later than **2:00 p.m. on Tuesday, February 11, 2025**. Responses may be submitted electronically at tpuc.docketroom@tn.gov with one hard copy mailed to the Docket Manager at the Tennessee Public Utility Commission, 502 Deaderick Street, 4th Floor, Nashville, Tennessee 37243.

Please contact me at david.foster@tn.gov or by phone at (615) 770-6884 should you have questions or need clarification of any requested item. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink that reads "David N. Foster".

David Foster, Director
Utilities Division

C: Via email:
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Docket File

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Second Staff Data Request to Limestone Water Utility Operating Company
Docket No. 24-00044

1. Provide the number of undeveloped lots having access to the water system by development. Designate if this lot is owned by the developer or the customer.
2. Provide the number of undeveloped lots having access to the wastewater system by development. Designate if this lot is owned by the developer or the customer.
3. Refer to CONFIDENTIAL Transaction_Detail_Report 24.04.30.xlsx showing total tap/connection fees of \$214,425 for the 12 months ended April 30, 2024. Separate the total amount of tap/connection fees between water connection fees and wastewater connection fees.
4. Refer to Limestone Water Utility Operating Company, LLC Report Demonstrating Compliance With Filing Requirements Of Order Approving Settlement Agreement And Transfer Of System And Granting Certificate Of Convenience And Necessity. (Exhibits 1, 3 and 5 Submitted Under Seal As Confidential And Proprietary) filed in Docket No. 21-00060 on April 10, 2023. Provide a calculation showing the acquisition adjustment for the Chapel Woods system.
5. Refer to DR 2-7 Land – CONFIDENTIAL.xlsx. Provide a detailed breakdown of Company's post-acquisition increases to land and land rights in a format similar to the one provided for transaction costs in DR 67 Transaction Costs – CONFIDENTIAL.xlsx.
6. Provide an update to the Company's revenue requirement calculations and supporting schedules assuming the Commission approves Limestone's request to recover its proposed acquisition adjustments, transaction costs, escrow retention, and rate case costs.