From: [redacted]
To: Contact TPUC
Subject: [EXTERNAL] Docket 24-00044
Date: Thursday, February 6, 2025 3:24:30 PM

To whom it may concern: I wish to comment on the proposed petition by Limestone Utility Operating Company ("Limestone Water") to raise water and wastewater utility rates over a large section of West Tennessee. I own a residence in one of the systems affected, Shiloh Falls Residential, in which the average monthly water usage of 3000 gallons is proposed to rise from $20 per month to $86.64 per month. I believe this colossal increase is unrealistic and unjustified, therefore, I strongly oppose it for several reasons listed below:

1. Limestone Water's petition asks for a rate increase representing 333% above the existing rate for Shiloh Falls Residential. This level of increase is extremely excessive and has not been justified in its petition of July 16, 2024. The petitioner proposes to raise its rates claiming that previous owners of the systems it has purchased have not provided adequate investment nor have they provided appropriate relief to maintain regulatory compliance to provide safe and reliable water and wastewater services to their customers. Limestone Water seeks to consolidate its rate system statewide to achieve a single rate structure that will somehow satisfy the needs of its customers. These previously purchased systems have apparently operated in a compliant manner or significant inadequacies should have been addressed and corrected by the local regulatory jurisdictions. The petitioner should consider altering its business model in the future to avoid purchase of such systems if vastly increased rates are necessary to keep them operating.

Consolidating the rate structure of multiple water and wastewater systems is unfair to certain users. The shortcomings and costly corrective actions of certain systems should not be imposed on other systems that are operating in compliance with local regulations. Why should my rate be used to subsidize the corrective operating costs of other more expensive systems? Each operating system should be charged based on the required operating costs of that system.

2. Rates for water and wastewater systems should be established reflective of the actual water usage and wastewater treatment experienced in that system. I suggest a pro rata rate structure be established defined by the different water amounts used. For example, levels of 1,000, 3,000, and 6,000 gallons of average monthly water usage could be used to differentiate the levels of billing. In other words, "pay for what you use". I own a recreational residence in the Shiloh Falls Residential area and believe it unfair to pay the same rate as those full time residents who use water in much greater amounts. The current "one size fits all" rate structure (3,000 gallons average water usage) is simply unfair to those using significantly less water.

3. The rate requested by the petitioner is grossly excessive by any standard. All citizens have been subjected to increased goods and services costs due to Covid-19, inflation, and other factors over the past four years in particular. The average cost increases have been in the neighborhood of 10-20%. I suggest Limestone Water consider petitioning for a rate increase, if fully justified, in that range somewhat consistent with other cost increases.

4. Limestone Water has apparently used every method at its disposal to intentionally reduce the number of people being aware of this proposed rate increase. The vast majority of the persons attending the public meeting of January 30,2025 in Counce, Tn. had been contacted by word of mouth. The posting of this comment meeting in a small local tabloid paper simply does not reach an adequate number of affected people. If the petitioner can promptly send monthly bills to all of its customers in a billing area, then it can also send to each customer a notice of any proposed rate increase by U.S. mail.

5. Many of the people affected by this proposed rate increase live on fixed incomes and can ill afford to absorb this unwarranted rate increase.

In summary, this extremely large rate increase for water and wastewater treatment by Limestone Water is unjustified, and it will have significant negative impact on its current customers. This proposal should therefore be denied or the rate increase reduced to a much more reasonable level of 10-20%. Thank you for the opportunity to comment on this important matter.

Yours Truly,

Robert M. Reeves
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