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To: [Contact TPUC](#)
Subject: [EXTERNAL] Comments to Docket # 2400044
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To The TPUC Board of Directors

I attended the public forum meeting last Thursday at the Pickwick Landing State Park (PLSP). Thanks to the TN Associates who were there and leading the public forum. Also, thanks to the staff of the PLSP for their cordial support and for their "on the fly" expansion of the room as the crowd grew over the first couple of hours. There was a very large turnout for this forum. I, like many others, gave a public statement, but wanted to add additional comments after that forum about the request of Docket # 2400044.

Almost all who attended were hungry for details and communication about a rate increase for both water and wastewater services provided by Limestone (Aqua) and extremely frustrated and confused about details as Limestone, to my knowledge, made no attempt to directly communicate with any member represented at the forum. Another observation from the forum that I discovered was that some customers are water only, some are water and wastewater customers, some are only wastewater customers, not all customers who get water have a water meter, some get water from the Savannah Utility, some groups have wells, some pay flat rates today for water and sewer, while others pay a rate for water and that rate is doubled to cover the wastewater service. Perhaps there are other options related to what rates are paid today, but certainly you can understand the frustration and confusion of the customer base of Limestone. Most felt that Limestone had done a good job servicing the accounts since they took over, but a horrible job of being transparent and open to the customers with no communications over the past couple of years.

To better understand the docket request I spent some time reviewing the Petition of Limestone Proposal to increase rates, charges, and fees as defined by TPUC Docket 2400044 and as posted on your website of public information. This petition was sent to the TPUC Docket Room on December 19, 2024. Specific reference to pages 29 - 44.

As you are aware, this petition is a proposal to consolidate rates for both water and

wastewater across all customers. Because of the variety and different type of customer base as described above (and perhaps there are others), the proposal is simply not acceptable to this customer base without first making significant capital investment to "equalize" the services and make some concessions to usage of both water and wastewater. A flat rate for water and wastewater service - to 1. a single person connection living on fixed income, 2. a lake home-weekend only customer, 3. a large family who lives 365 days a year at a residence, 4. an individual who has a sprinkler system as well as a home service, 5. a business that consumes a large volume of water and thus discharges a large quantity of water and wastewater - will never be equitable.

As to the specific rate increases as proposed in the docket I can only speak to my account. I am part of the Aqua Group at my Savannah Address. I have a ¾ inch water meter. I currently pay per the table on page 40 of the petition \$19.95 minimum fee for the first 1000 gals of water then \$3.05 for each additional 1000 gals. Per the published rates of Savannah Utility, a customer outside the city purchasing more than 50,000 gals pays \$3.18 per 1000 gals. I assume Limestone gets a discount on this rate but using this rate I currently pay a 620% mark-up on first 1000 gals but agree a minimum is reasonable for a customer to expect as there are fixed costs to get the water to the user and maintenance to support. At the proposed new minimum rate of \$50.62 for the first 1000 gals, I would be paying 1600 % mark-up on the first 1000 gals and an additional 330% (\$10.55/\$3.05) increase for each additional 1000 gals purchased. What service do I get for the additional 980% mark-up? Not to mention the 330 % cost increase for additional gals of water. I think it is all the same water!! And what makes the water cost more when it flows thru a larger meter? A 1000 gals of water has the same taste and quality no matter what size meter it flows thru!! These proposed water rate increases are out of line and I suggest not defensible.

The wastewater rate increases are even more unreasonable. To "paint" each customer with the same \$86.64 monthly flat rate brush no matter the size of the household, or the usage of water, or whether you are a residential or commercial customer makes no sense to me and again not defensible. Sewer rates practically have to be tied to water usage rates. As a point of reference, the Savannah Utility System charges \$8.59 per 1000 gals of water used for wastewater treatment. For an average account of 3000 gals this would be \$25.77 per month vs the \$86.64 proposed by Limestone.

Limestone is truly living up to their F rating by the BBB.

I recommend that you reject this petition as presented. I also request that you "paint" Limestone with the same consolidation brush with other similar water/wastewater

service providers in the surrounding western Tennessee area to deliver a new plan and proposal for reasonable, comparable, competitive, and defensible rates.

I think everyone at the forum last week agrees that a reasonable "cost of living" increase is expected and would be acceptable. Any rate increase above that should be based on a better service, or quality of water improvement, or capital expenditure or other that delivers an improved service to the customer. We are a rational customer base but request the respect of Limestone as we are open to transparency and communication about future services.

Thank you for your time to review my remarks.

Larry Robertson

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