

February 11, 2025

VIA ELECTRONIC FILING

David Foster, Director
Utilities Division
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on February 11, 2025 at 2:01 p.m.

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, TPUC Docket No. 24-00044*

Dear Mr. Foster:

We are in receipt of your data requests to Limestone Water Utility Operating Company, LLC (“Limestone”), dated January 31, 2025. Please find Limestone’s responses below.

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.*

Response: Limestone does not have sufficient information to provide an accurate count of undeveloped lots. Unfortunately, Limestone did not receive developer plans or jurisdictional zoning information from the prior owners of the systems in this case and is therefore unable to accurately determine which parcels in its territory will transition into active connections.

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.*

Response: Limestone does not have sufficient information to provide an accurate count of undeveloped lots. Unfortunately, Limestone did not receive developer plans or jurisdictional zoning information from the prior owners of the systems in this case and is therefore unable to accurately determine which parcels in its territory will transition into active connections.

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.*

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Response: Please see Column J in CONFIDENTIAL attachment “DR 3 - Connection Fee Split - CONFIDENTIAL”.

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.*

Response: Please see CONFIDENTIAL attachment “DR 4 - Chapel Woods Acquisition Adjustment - CONFIDENTIAL”.

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.*

Response: Please see CONFIDENTIAL attachment “DR - 5 Land Detail - CONFIDENTIAL” and folder “DR 5 - Land & Land Rights Support - CONFIDENTIAL”. The increases to land and land rights include closing costs from the settlement statements at the time of acquisition closing as well as surveys, title costs, easements, and other land rights outlined on tab STAFF DR 5 Land Rights Detail.


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.*

Response: In Limestone's proposal, the elimination of the escrow would have no effect on the current revenue requirement. Currently escrowed funds would be used for future capital improvements and recorded as CIAC. Please see CONFIDENTIAL attachment “DR 6 - Revenue Requirement Impact – CONFIDENTIAL.” More detail on the acquisition adjustment and transaction costs have been provided in response to CAD DR 66 and 67, and summarized in “DR 6 - Revenue Requirement Impact - CONFIDENTIAL” on the Detail tab.

Please feel free to reach out to me if you have any further questions.

Sincerely,

BUTLER SNOW LLP


Katherine Barnes Cohn

Attachments

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Karen H. Stachowski, Consumer Advocate Division
Victoria B. Glover, Consumer Advocate Division
Shilina B. Brown, Consumer Advocate Division

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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This the 11th day of February 2025.



Katherine Barnes Cohn