

From: [REDACTED]
To: [TPUC DocketRoom](#)
Subject: [EXTERNAL] Docket Number 24-00044
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Good Afternoon,

My name is Autumn Moore and this is a digital copy to be added to the public record of the statement that I made this morning at the hearing for Limestone's petition for rate increase and consolidation. Thank you.

Docket Number: 24-00044

Commissioner, panel, and Limestone, good morning. My name is Autumn Moore and I live at [REDACTED]. Our home backs up to Cartwright creek, the actual Cartwright creek, not the previously named sewage treatment facility. We have lived in River Rest since the middle of 2020 and therefore span the bridge between the previous owner and its current. I know you have quite the task ahead of you for rate setting. I thank you for the extra time allocated for education and comment.

I object to the amount of the proposed rate increase and I ask you to defer your decision for 30 days to allow for review/audit of Limestone for compliance and transparency of expenses before setting your rate.

1. The timeframe of notice was inadequate to allow for proper community feedback. Is it even enough notice for the Consumer Advocate Division of the Attorney General or the committee? Is it standard practice to schedule such important hearings only 8-15 days in advance?

February 5 a tele meeting was held between Limestone, the Consumer Advocate Division and

the TPUC to set forth today's hearing. From that meeting Limestone drafted a letter on the same day. A notice was posted somewhere on February 7th about today. This hearing was requested in July of 2024, 7 months prior and this is scheduled during a conference here at TPUC. By the time I received the letter from Limestone it was Monday, February 10th. I have been told that Limestone fulfilled their legal requirements for notice by posting on their website and in the newspaper. Which newspaper? Was it the paper that is only delivered on Wednesdays? Our community receives a statement every month either electronically or by paper and it is well within their means and responsibility to at the very least give notice that there was an upcoming conference with TPUC and the exact day and time for a hearing on proposed rate increases would be announced closer to the event.

I sat in a meeting [REDACTED] with CSWR last summer and they expressed wanting to be a good neighbor, but this lack of timely communication is not an act of good faith. Actions speak louder than words.

2. Limestone does indeed need updating and a rate increase is necessary, if not just for inflation. I understand that. And they also need to be held accountable for maintaining a safe and properly functioning facility. The facility is Licensed for 250k gallons per day. This was the design capacity of the plant 40 years ago. They are regularly in excess of that flow amount by upwards of 750,000 gallons per day. Why have they been given a permit when they have been in non-compliance for the last 2 inspections spanning since 2019? I realized that TPUC is not involved in this aspect, however, the two departments are inextricably linked. Limestone wants higher rates, to fund improvements and expansion projects, yet they are not within compliance already. TPUC governs the rates they can charge and Limestone needs to do the work first and prove their proposed rate is accurate. NOT the other way around.

Perhaps if they hadn't retained the law firm Butler Snow, one of Nashville's most prestigious law firms, they would have the money to replace the broken pump from December already. Which is still being run off generators to prevent further issue. Again, I know the Consumer Advocate Division is assessing Limestone, but this is not sufficient time to do so in my opinion.

3. Is the proposed amount for the new rate based off their estimated \$9.5 million spent, which was stated in their letter? How much of that \$ 9.5 million was purchase price and is this included in their operating expenses? It is my understanding that purchase cost is not part of operating expenses and therefore cannot be factored into rate. And yet, they have included that amount in their explanation to us as a community. This further illustrates that while Limestone says one thing, their actions do not follow good faith and an audit is required.

3. I will end my statement with this:

I am a mother, with 2 children as you can see. I walk the trail behind our house in all sorts of weather and seasons, weekly. I follow the trail as it itself follows Cartwright Creek all the way to the Harpeth River and then makes a turn westerly and follows the Harpeth up a hill past White Oak trees, Lions Mane and oyster mushrooms, Cedar trees, flox, wild garlic, as well as invasive species. We used to have at least 2 Tennessee river otters that I have not seen in quite some time. We have catfish and countless songbirds, squirrels, moles and at least one owl along with coyotes and a fox that occasionally comes to visit.

When we moved here in 2020, it was magical. In early January this year, I walked this trail

with my kids performing a phenology walk, which is a hike with the intended study of natural phenomena. We did a second and third phenology walk between then and now. My daughter has asked me every occasion why the trail smells so stinky, and I had to inform her it was sewage!

This is not the first time or even the 2nd or 3rd time, but overflows and smells have become a regular occurrence for easily a year or more. But it has taken me a while to figure out the avenue for filing complaints and concerns. I also have wanted to give the benefit of the doubt to a company in our own backyard for not just doing the bare minimum but the ecologically and ethically responsible thing to do. I will be compiling the videos and items I have and reviewing TDECS dataviewer so as I am able to send a compiled letter to TDEC, and I am not the only one in our community preparing to do so.

In the meantime, I urge you Commissioner and panel to NOT APPROVE this rate amount, to not allow any additional loading on this facility and to work with TDEC to understand Limestone's environmental cost so as to establish a reasonable and responsible rate amount. I want a safe place for my kids. Not one that may be technically safe on paper but the lived experience is quite a different story. I thank you again.