

**From:** [Contact TPUC](#)  
**To:** [Ectory R. Lawless](#)  
**Subject:** FW: Docket #24-00044 Limestone/Grassland Serer Plant rate increase application  
**Date:** Monday, February 24, 2025 7:23:20 AM

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**From:** Barb Sturgeon <[REDACTED]>  
**Sent:** Friday, February 21, 2025 10:18 AM  
**To:** Contact TPUC <Contact.TPUC@tn.gov>  
**Cc:** Drew Torres <[REDACTED]>; Matt Williams <[REDACTED]>; Chas Morton <[REDACTED]>  
**Subject:** [EXTERNAL] Docket #24-00044 Limestone/Grassland Serer Plant rate increase application

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Executive Director Earl Taylor Chat,

My name is Barbara Sturgeon and along with Mr. Drew Torres, I am a Williamson County Commissioner for District 8 which encompasses Grassland and subsequently River Rest subdivision and the Limestone sewer plant within it. I am contacting you to express our concerns with the operation of this plant and the proposed rate increase by Limestone.

Only last Tuesday, it was brought to my attention that Limestone was asking for a rate increase and I only found out because concerned constituents in the River Rest neighborhood contacted me because they had received a letter from Limestone just the previous day making them aware of the TPUC hearings taking place this week. I was told Limestone put a notice on their website and in a newspaper, but I don't know when and I don't know what paper or what page. The fact is most people don't actually read paper newspapers or frequent Limestone's website. The question is, if they were forthright community partners, why wouldn't they have communicated this important news months ago by placing a notice in their user's monthly bills? Nor did they contact the county or me. I was able to listen to the hearings only for 30 min on the Webex call Tuesday. I would have been present to see the graphs and charts as well if I had been given more notice of the hearings.

Back in 2023 when Limestone first purchased this plant, I initiated communication with

Limestone and helped facilitate Grassland community meetings as many residents with old or failing septic systems were eager to obtain sewer service. Limestone said they would do it by renovating and upgrading the Grassland plant with new technology. Unfortunately, when Limestone presented these people with infrastructure costs to run the lines to individual streets, the price tag of \$40-200K scared away many of those people. According to the River Rest HOA, at a neighborhood meeting in August 2023 at the River Rest pavilion, Limestone representatives told residents to expect an increase in the next few years but not more than 20%. What rate increase are they proposing? Is it more than 20%?

For months or a year, I did not hear from Limestone but about a year ago they asked for a zoom call with me and several residents and announced they had a moratorium on any new taps as TDEC had officially given them permissible emission numbers and they would need 2 years to construct a new plant to meet these stipulations. They would not be increasing the capacity of the plant. We were disappointed and blindsided by this news but felt powerless in the situation. Now, a year later, I am surprised to hear that Limestone has not even begun constructing the new system.

Since Limestone purchased the plant, there have been numerous events of the leakage of human waste into this residential neighborhood, especially when it rains. The smell is obvious, and children are not allowed to ride their bikes in certain areas because of it. One resident told me today:

"I was at one of their manhole covers today with the TDEC field office, and there's dried toilet paper outside it, leading into our soccer field."

"We are currently in the process of cataloging pictures and videos of experiences where the facility has leaked or had pump failure for a formal letter of complaint to April Grippo with TDEC. We do not have a significant number of incidents on TDEC's website in part because many of us, including myself, have not known how to file, or what in fact should be reported."

It appears that this plant is operating 2-3 times more waste water than it was designed for and a study should be done.

Additionally the road leading to the plant is torn up from the heavy trucks coming and going to the plant.

All this to say that before Limestone is granted a significant rate increase they should be

held accountable. Can they be required to obtain a significant bond until they clean up the operation of this plant and repair the road? A rate increase is insulting to the people in this neighborhood who are enduring this washout, overflows and leakage of human waste.

One important fact I would like to point out is that Limestone had the opportunity to apply for a grant of ARPA money from TDEC through the county. I personally asked them to apply multiple times and eventually they pacified me and agreed to. **But they did not.** These grants were available to all utilities including "for profit" ones. This money could have alleviated the need to raise rates on the residents served by the Grassland plant.

All five utilities that applied received grants for a total of \$5.6 million. I believe they were City of Brentwood Water and Sewer, Harpeth Waste Water Co-op, Milcrofton Water, HB & TS Water, and Mallory Valley Water.

As a local representative, I am disappointed. I had hoped Limestone would be a positive partner and contributor in the Grassland community. I have found them to be removed from the negative conditions in River Rest caused by their plant, uncommunicative, not transparent and extremely slow do the improvements they said they would do at the Grassland plant.

I hope this information is helpful to you in your deliberations and I urge you to look out for the welfare of the Tennessee citizens in the Grassland area that are affected by this sewer system which includes Grassland Middle and Elementary schools and other neighborhoods.

Sincerely,

Commissioner Barb Sturgeon

[REDACTED]

Commissioner Drew Torres

[REDACTED]