

Terra N. Allen

From: Karen H. Stachowski
Sent: Wednesday, September 3, 2025 8:40 AM
To: Anna Booher **24-00044**
Cc: Terra N. Allen
Subject: RE: Ltr to Limestone re Grassland STP from Sneed Forest Neighborhood Assoc. (Franklin, TN)

Ms. Booher,

Thank you for your permission. We will file it immediately.

I think it is important for the record to show and the Commissioners to be aware of the pre-existing neighborhood residents that have been waiting for so long to hook onto the Grasslands system.

Karen

Karen H. Stachowski | Deputy Attorney General
Consumer Advocate Division
Office of Tennessee Attorney General
500 Dr. Martin L. King Jr. Blvd., Nashville, TN 37243
Mailing Address:
P.O. Box 20207, Nashville, Tennessee 37202
p. 615.741.2370
f. 615.741.1026
Karen.Stachowski@ag.tn.gov



Our Mission – We are the State’s law office serving Tennessee with principled, independent, and excellent counsel.

From: Anna Booher <[REDACTED]>
Sent: Wednesday, September 3, 2025 8:37 AM

To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>

Subject: Re: Ltr to Limestone re Grassland STP from Sneed Forest Neighborhood Assoc. (Franklin, TN)

I would be happy for you to file it. If you have any suggestions for any further action we might take, please let me know. I have been in communication with River Rest board members who are very thankful for the help you have provided thus far.

Thank you so much!

Anna Booher



On Sep 3, 2025, at 8:33 AM, Karen H. Stachowski <Karen.Stachowski@ag.tn.gov> wrote:

Ms. Booher,

I received your email with the attached letter. Do you mind if the Consumer Advocate files your email with the letter with the Tennessee Public Utility Commission in TPUC Docket No 24-00044 so that that it is officially in the record?

Thank you for your time and attention to my request.

Karen

Karen H. Stachowski | Deputy Attorney General
Consumer Advocate Division
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<image001.png>

Our Mission – We are the State’s law office serving Tennessee with principled, independent, and excellent counsel.

From: Anna Booher <[REDACTED]>

Sent: Wednesday, September 3, 2025 8:23 AM

To: AARON SILAS <asilas@cswrgroup.com>

Cc: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; David Foster <david.foster@tn.gov>; Gino Bulso <rep.gino.bulso@capitol.tn.gov>; Barb Sturgeon <Barb.Sturgeon@williamsoncounty-tn.gov>; Drew Torres <drew.torres@williamsoncounty-tn.gov>; Jo Anna Brown <joanna@cswrgroup.com>

Subject: Ltr to Limestone re Grassland STP from Sneed Forest Neighborhood Assoc. (Franklin, TN)

Dear Aaron,

Please see the attached letter from the Sneed Forest Neighborhood Association which I have also sent you via mail.

Is there anyone else at Limestone to whom you recommend I send a copy of this letter?

Thank you.

Anna Booher
Sneed Forest Neighborhood Association
Board Member

[REDACTED]
[REDACTED]
[REDACTED]

<Sneed Forest Ltr to Limestone Re Grassland STP 9.3.25.pdf>

Sneed Forest Neighborhood Association

c/o Anna Booher



September 3, 2025

Mr. Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources
1630 Des Peres Road, Suite 140
Des Peres, MO 63131

Re:

- CSWR – Limestone Water Utility – Grassland STP (Franklin, TN)
- Partial solution to enable sanitary and sustainable wastewater service in the Grassland area
- Request for wastewater service from over 65% of Sneed Forest residents on septic systems

Dear Mr. Silas,

I am writing on behalf of the Sneed Forest Neighborhood Association.

Thank you again for attending the July 15, 2025, meeting hosted by State Representative Gino Bulso regarding the Grassland STP. We appreciate the time and attention you and other state and local officials dedicated to this important matter.

As you requested during the meeting and on our follow-up call the next day, Sneed Forest residents who are interested in wastewater service from Limestone have submitted service requests through your online portal. I am pleased to report that so far over 65% of Sneed Forest households currently without wastewater service have submitted requests (See Attachment 1).

This level of interest is comparable to the number of taps projected for the proposed Nash Ridge and Adley developments that Limestone already plans to serve.¹ Extending service to the existing Sneed Forest neighborhood would help Limestone achieve better economies of scale for

¹ The 37 Sneed Forest residents who have submitted service requests to Limestone as of September 3, 2025, represent 67% of the property owners in Sneed Forest who currently lack wastewater service—including 73% of those on Foxhaven Drive (86% including the lots that are part of TDEC Project 25.0125), 80% of Boxwood Drive, 80% of McIntyre Court, 33% of Moran Road, and 50% of Hillsboro Road.

the urgently needed environmental and health safety upgrades to the Grassland STP, ongoing operating costs, and rate case expenses which will benefit not only all existing Limestone customers – like our neighbors on all sides of Sneed Forest in the existing River Rest, Hunterwood, and Old Natchez neighborhoods– but also our future new neighbors in the two proposed developments. Adding wastewater service for all these new customers will be a win for everyone – including Limestone and the countless Tennesseans in the Harpeth River Watershed who have a strong interest in sanitary conditions and environmental safety in the Grassland area.

I was encouraged to discover that Limestone appears to be willing to connect a service line for some lots within the middle of Sneed Forest (TDEC Project 25.0125).² Extending service to the remainder of Sneed Forest would make that service line even more cost-effective.

I respectfully request that Limestone move forward with establishing wastewater service for all the unserved Sneed Forest residents (area outlined in *green* on the attached map) by expanding the Grassland facility capacity as needed to meet this demonstrated public need and by committing to work with us to establish this service in a reasonable and cost-effective manner (See Attachment 4).

As background, the portion of Sneed Forest closest to Limestone’s Grassland STP has awaited this service for decades. Developed in the 1970s, the neighborhood is only partially served today.³ Limestone is the only potential wastewater service provider for the unserved portion of Sneed Forest.

After Limestone’s acquisition of the Cartwright Creek facility on December 21, 2021, Limestone held two meetings at local schools in 2022 where your representatives indicated that additional capacity at the Grassland facility would soon allow service to neighborhoods like Sneed Forest. Multiple residents submitted interest forms at that time; however, to my knowledge, the last communication from Limestone to Sneed Forest residents was on December 6, 2022 (excluding any private communications that may have occurred regarding TDEC Project 25.0125) (See Attachment 3).

Geographically, Sneed Forest sits immediately adjacent to Limestone’s current service area (outlined in *blue* on the attached map). With the proposed TDEC Project 25.0125, Limestone wastewater lines may run from Moran Road down Boxwood Drive (right by McIntyre Court) and onto a small portion of Foxhaven Drive--directly past numerous homes whose owners have

² TDEC confirmed that engineering plans for a private service line from Limestone into the Sneed Forest neighborhood to serve two new connections were submitted on February 27, 2025, and that these plans are pending approval. This is great news; if Limestone is already prepared to run a line into Sneed Forest to serve two taps in the middle of the neighborhood it will no doubt be even more efficient to provide service to 30-40 additional Sneed Forest customers. This filing is consistent with reports from multiple residents that in the fall of 2024 an unknown party placed stakes in their yards from the neighborhood entrance on Moran Road down Boxwood Drive to Foxhaven Drive. These stakes seem to be associated with the unimproved lot at 2409 Foxhaven Drive and possibly an adjacent property (See TDEC Project 25.0125 Sneed Forest Low Pressure Sanitary).

³ Harpeth Valley Utility District (HVUD) provides water and wastewater service to some homes on the Sneed Road side of the neighborhood, while the other homes (outlined in *green* on the attached map) receive water from the City of Franklin but remain on septic systems. HVUD has provided written confirmation that it does not and will not provide wastewater service to these properties for several reasons including the fact that HVUD does not provide wastewater service in areas where it does not also provide water (See Attachment 2).

already requested service in 2022 and 2025. (See Attachment 4 – path shown by a *red* dashed line). The strong response to Limestone’s recent request for service submissions demonstrates that demand remains high. By serving these existing Sneed Forest homes alongside the proposed Nash Ridge development (TPUC Docket No. 23-00036 with 39 new taps; See Attachment 4 – portion of Nash Ridge property outlined with a *blue* dashed line) and the proposed Adley development (TPUC Docket No. 24-00020 with 30 lots) – Limestone will achieve greater economies of scale and operational efficiency.

By providing the requested service to Sneed Forest, Limestone will be able to:

- Increase efficiency and spread costs for required capital investments, ongoing operations, and rate cases;
- Demonstrate responsiveness to established neighborhoods as well as new developments, building goodwill with residents, officials, and regulators;
- Strengthen its presence in Williamson County, one of Tennessee’s fastest growing regions;
- Protect groundwater and the Harpeth River by replacing aging septic systems; some nearly 50 years old; and
- Support long-term community stability and property values, reinforcing the local tax base for schools, safety, and infrastructure.

I have copied the officials who attended the July 15, 2025, meeting as well as Sneed Forest property owners who currently lack wastewater service.

Thank you for your consideration of this request.

Sincerely,



Anna Booher
Sneed Forest
Neighborhood Association
Board Member

Attachments

cc: Karen H. Stachowski, Deputy Attorney General
David Foster, Director of Utilities Division at TPUC
Gino Bulso, State Representative
Barb Sturgeon, County Commissioner District 8
Drew Torres, County Commissioner District 8
Jo Anna Brown, CSWR Vice President of Government Affairs
Sneed Forest neighbors lacking wastewater service

Attachment 1

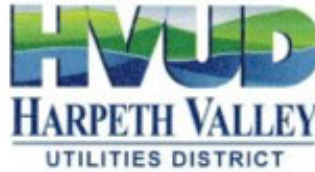
Confirmed Sneed Forest Requests for Service Submitted to Limestone Since July 24, 2025 (Names have been redacted)

2397 Foxhaven Drive
2400 Foxhaven Drive
2401 Foxhaven Drive
2404 Foxhaven Drive
2405 Foxhaven Drive
2408 Foxhaven Drive
2416 Foxhaven Drive
2417 Foxhaven Drive
2421 Foxhaven Drive
2425 Foxhaven Drive
2426 Foxhaven Drive
3001 Boxwood Drive
3004 Boxwood Drive
3005 Boxwood Drive
3013 Boxwood Drive
2404 McIntyre Court
2407 McIntyre Court
2409 McIntyre Court
2411 McIntyre Court
2412 McIntyre Court
2413 McIntyre Court
2414 McIntyre Court
2415 McIntyre Court
2416 McIntyre Court
2417 McIntyre Court
2418 McIntyre Court
2419 McIntyre Court
2420 McIntyre Court
2421 McIntyre Court
2422 McIntyre Court
2423 McIntyre Court
2425 McIntyre Court
1000 Moran Road
1064 Moran Road
1072 Moran Road
1080 Moran Road
2505 Hillsboro Road
2509 Hillsboro Road

Attachment 2

Harpeth Valley Utility District Letter

**(Stating HVUD Does Not Provide Water or Wastewater Service
to Sneed Forest Section 2 Subdivision)**



August 28, 2025

Anna Booher
2420 McIntyre Court
Franklin, TN 37069

**RE: Water and Wastewater Service
Williamson County
Existing Subdivision – Sneed Forest Sec 2**

Dear Ms. Booher,

Harpeth Valley Utilities District of Davidson and Williamson Counties, Tennessee (HVUD) does not provide nor has desire to provide water or wastewater service to the Sneed Forest Section 2 subdivision.

If you have any questions or comments, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Sam Harrison".

Sam Harrison
Senior Engineer

Attachment 3

**12/6/2022 Email from Limestone Representative
to a Portion of Sneed Forest Residents Regarding Potential for Wastewater Service**

(some names and email addresses have been redacted)

From: [...]

Date: December 10, 2022 at 6:37 PM

To: Anna Booher annabooher@comcast.net

Subject: Fwd: Cartwright Creek Sewer

Begin forwarded message:

From: Cheryl Waites <cwaites@cswrgroup.com>

Date: December 6, 2022 at 4:21:29 PM CST

To: [...] Josiah Cox <jcox@cswrgroup.com>, Todd Thomas <tthomas@cswrgroup.com>, Jake Freeman <jfreeman@cswrgroup.com>, Chelsie Carter <ccarter@cswrgroup.com>

Cc: [...] Barb Sturgeon <Barb.Sturgeon@williamsoncounty-tn.gov>

Subject: RE: Cartwright Creek Sewer

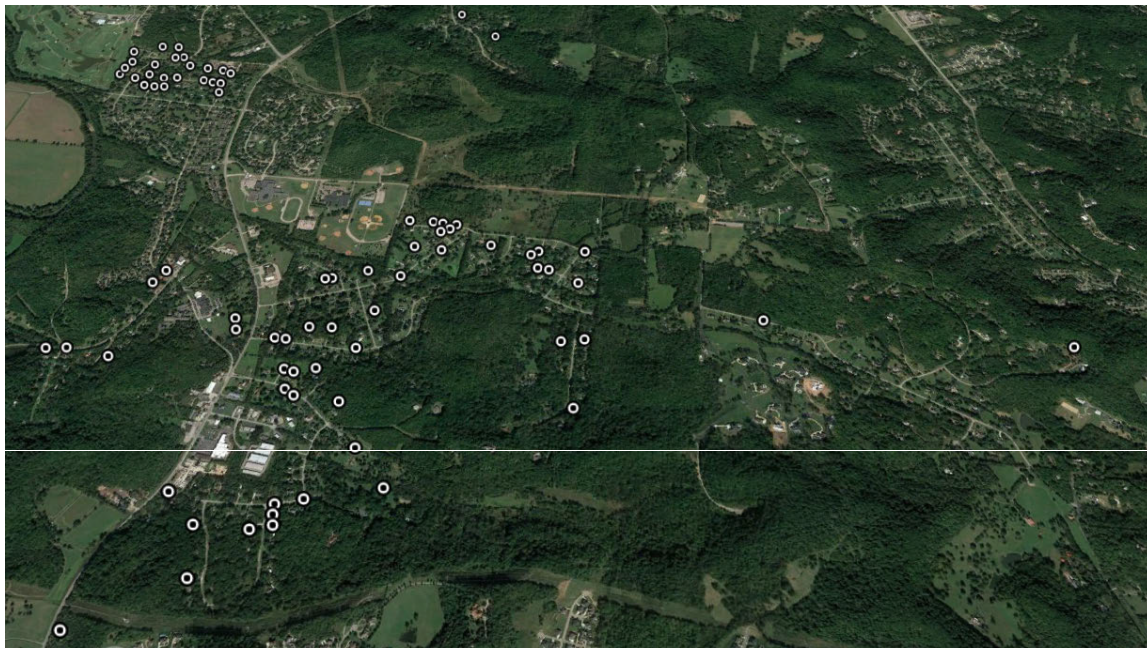
N[...],

During the month of November we were still receiving quite a few submissions from people interested in connecting. They have slowed down significantly, so I think we have captured the majority who are interested. Please see the map below. The area is not divided into zones like the first map... we are waiting to do that after we are sure we have everyone who is interested registered – before we come back for the next meeting.

It looks like a lot of people in Battlefield dropped off between the first and second meeting. Remember, this new map is drawn only from those who filled out the form on the Intranet after our second meeting at the school library where we presented cost estimates. We plan on posting this new map on the website as well as emailing everyone who has signed up. We plan on being back in the area for another meeting in January where we will have updated cost estimates based on the most recent map. People are still encouraged to fill out the form on the website if they are interested. <https://www.centralstateswaterresources.com/limestone-water/grassland-sewer-extension/>

Thank you, Cheryl

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



From: [...]

Sent: Tuesday, December 6, 2022 2:41 PM

To: Josiah Cox <jcox@cswrgroup.com>; Todd Thomas <tthomas@cswrgroup.com>; Jake Freeman <jfreeman@cswrgroup.com>; Chelsie Carter <ccarter@cswrgroup.com>

Cc: [...] Barb Sturgeon <Barb.Sturgeon@williamsoncounty-tn.gov>

Subject: RE: Cartwright Creek Sewer

Cheryl, Any updates on Cartwright Creek sewer? The flyer you all sent said we should have heard something back from you last month.

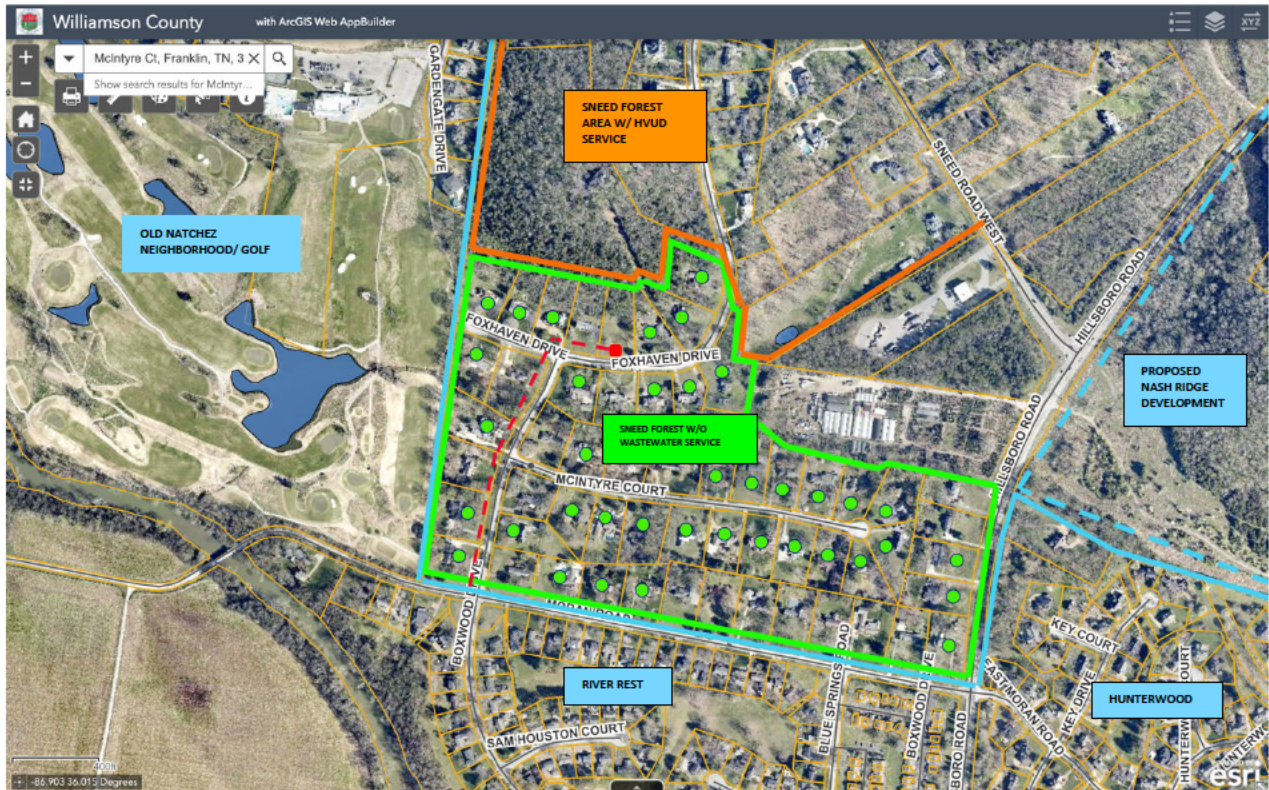
Thanks

Attachment 4

Map of Unserved Sneed Forest Properties and Surrounding Area

Map of Unserved Sneed Forest Properties and Surrounding Area

This map represents our best understanding based on public records and communications with Limestone, TDEC, TPUC, HVUD, current Limestone customers, and multiple Sneed Forest residents.



- Sneed Forest area without wastewater service (with City of Franklin water)
- Confirmed requests for service submitted to Limestone
- Border of Limestone service area (includes Old Natchez, River Rest, & Hunterwood)
- - - Border of proposed Nash Ridge development & additional Limestone service area (by TPUC order amending its Certificate of Public Convenience and Necessity dated January 26, 2024)
- - - Path of survey stakes associated with the proposed TDEC Project 25.0125
- Border of Sneed Forest area with water and wastewater service available from HVUD