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March 2, 2026

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VIA ELECTRONIC FILING

Hon. David Jones, Chairman
Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

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 [Phase 2 Increase], TPUC Docket No. 24-00044*

Dear Chairman Jones:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Direct Testimony of Aaron Silas* for Phase 2 of the above-captioned matter.

Please note that the Excel document titled *CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design*, which contains Exhibits AJS-1, AJS-2 and AJS-3 (which are not confidential) is being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**.

As required, copies will follow. Should you have any questions concerning this filing or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachments

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

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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

March 2, 2026

IN 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)**

Docket No. 24-00044

DIRECT TESTIMONY

OF

AARON SILAS

ON BEHALF OF

LIMESTONE WATER UTILITY OPERATING COMPANY, LLC

PHASE TWO

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DIRECT TESTIMONY OF
AARON SILAS

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Aaron Silas. My business address is 1630 Des Peres Road, Suite 140, St. Louis, Missouri, 63131.

Q. WHAT IS YOUR POSITION WITH LIMESTONE WATER UTILITY OPERATING COMPANY?

A. I am the Assistant Vice President of Customer Experience & Regulatory Operations at CSWR, LLC (“CSWR”), the affiliated company that has operational oversight over CSWR’s utility operating companies including Limestone Water Utility Operating Company (“Limestone Water” or “Company”). I have been employed with CSWR since October 2019 in various roles with increasing responsibility. My current responsibilities include the oversight of all state utility commission regulatory filings for all utility operating companies, including, but not limited to, acquisition cases, rate cases, and CCN expansions, as well as the coordination of all data request responses and any regulatory compliance filings. Additionally, I oversee the external communications team and CSWR’s Customer Experience Department including the third-party call center provider, enabling the Company to communicate with stakeholders regarding operational activities and accurately

1 respond to customer inquiries. I oversee such activities for affiliated operating
2 companies providing water or wastewater utility services to approximately 185,000
3 connections in Tennessee, Missouri, Arkansas, Kentucky, Louisiana, Texas,
4 Mississippi, North Carolina, South Carolina, Arizona, and Kentucky.
5

6 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
7 **EXPERIENCE.**

8
9 A. I received a Bachelor of Science degree with honors from Southern Illinois
10 University in Edwardsville (“SIUE”) with a major in Business Administration
11 specializing in Human Resources and Finance. The first few years of my career were
12 spent in the finance industry, including various roles within U.S. Bank and Stifel
13 Financial Corp. During my employment at Stifel Financial Corp., I received a
14 Master of Business Administration degree from SIUE as well.
15

16 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE TENNESSEE**
17 **PUBLIC UTILITY COMMISSION (“COMMISSION”)?**

18
19 A. Yes, I filed testimony in Limestone Water’s general rate case, Tennessee Public
20 Utility Commission (“Commission” or “TPUC”) Docket No. 24-00044. In addition,
21 I have filed testimony before the state utility commissions of Missouri, Texas,
22 Mississippi, Kentucky, Florida, and Arizona.
23

24 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
25 **CASE?**
26

1 A. The purpose of my testimony is to support Limestone Water’s compliance filing
2 submitted prior to the implementation of the second phase of the rate adjustment
3 approved by the Commission in its July 10, 2025, *Order Setting Utility Rates* in
4 TPUC Docket 24-00044 (the “2025 Order”). This filing provides revenues collected
5 by month, by system; the latest available billing determinants by system; a proposed
6 rate design to collect the remaining Commission-approved revenue deficiency; and
7 supporting testimony, as required by the *2025 Order*.
8
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10 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

11 A. Yes, I am sponsoring the following items:

- 12 • Exhibit AS-1: A summary of revenues collected by month and by system since
13 implementation of Phase One rates.
- 14 • Exhibit AS-2: The latest available monthly billing determinants by system,
15 including customer counts and usage volumes where applicable.
- 16 • Exhibit AS-3: Limestone Water’s proposed rate design for Phase Two.
17
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19 **Q. WERE THESE EXHIBITS DEVELOPED BY YOU OR BY SOMEONE**
20 **UNDER YOUR DIRECT SUPERVISION?**

21 A. Yes.

22 **Q. PLEASE SUMMARIZE WHAT OCCURRED DURING PHASE ONE OF**
23 **THE APPROVED RATE ADJUSTMENT.**
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1 A. In its *2025 Order*, the Commission determined that Limestone Water had an
2 approved revenue deficiency but directed that recovery be phased in to mitigate
3 customer rate shock.¹ As directed by the Commission, Phase One, effective May 1,
4 2025, implemented approximately one-half of the Commission-approved revenue
5 increase using the revenue requirement, billing determinants, and rate design
6 framework adopted by the Commission.² Pursuant to the *2025 Order*, the
7 implementation of Phase One did not reopen or modify cost of service, rate base, or
8 allocation determinations, but instead represented a methodical implementation of
9 the Commission’s *2025 Order*.

12 **Q. HOW WERE PHASE ONE RATES DESIGNED AND ALLOCATED**
13 **ACROSS SYSTEMS AND CUSTOMER CLASSES?**

15 A. Phase One rates were implemented on a standalone, system-specific basis, consistent
16 with the *2025 Order*. The rate design and allocation methodology submitted by the
17 Company mirrored the approach approved by the Commission, including the
18 continued use of flat monthly wastewater rates and Equivalent Residential Units
19 (“ERUs”) for commercial wastewater customers.³ Rate increases were allocated
20 proportionally and consistently with Phase One’s approved structure, and no new
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25 ¹ *2025 Order* at 103-104 and 106-107.

26 ² *Id.* at 103-106.

³ See *Commission’s Acknowledgement Letter*, Tariff No. 2025-0023 (August 20, 2025).

1 rate classes, reallocation of costs, or policy changes were introduced by Limestone
2 Water in complying with the *2025 Order*.⁴

3
4 **Q. DOES THIS FILING PROPOSE ANY CHANGES TO THE REVENUE**
5 **REQUIREMENT APPROVED IN THIS CASE?**

6 A. No. This filing does not propose any changes to the Commission-approved revenue
7 requirement, cost of service, rate base, or allocation methodology. The proposed
8 Phase Two rates are designed solely to recover the remaining portion of the revenue
9 deficiency approved by the Commission and to complete the phased-in recovery
10 authorized in the *2025 Order*. As authorized by the Commission, Limestone Water
11 has included associated carrying charges in its proposed recovery.⁵

12
13
14 **Q. WHAT RATE DESIGN FRAMEWORK DID LIMESTONE WATER USE AS**
15 **THE BASIS FOR THIS FILING?**

16 A. Limestone Water used the rate design framework approved by the Commission and
17 originally developed using the Commission’s revenue requirement and allocation
18 methodology. Specifically, the Company relied on the filing submitted in this docket
19 on May 19, 2025, titled “Limestone Water Utility Operating Company, LLC Revised
20 Rate Design And UOC Tariff (Excel Workbook Of The Rate Design Is Being
21 Submitted Under Seal As Confidential And Proprietary).”

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⁴ See *Commission’s Acknowledgement Letter*, Tariff No. 2025-0023 (August 20, 2025).

⁵ *2025 Order* at 106.

1 **Q. DOES THIS PHASE TWO FILING DEPART FROM THE COMMISSION-**
2 **BASED FRAMEWORK?**

3
4 A. No. This filing does not depart from, modify, or alter the Commission-approved
5 framework. The Phase Two rate design continues to rely on the same
6 Commission-based revenue allocation, system-level structure, and rate design
7 principles approved in the *2025 Order*.

8
9 **Q. HOW WERE RATES STRUCTURED ACROSS LIMESTONE WATER'S**
10 **SYSTEMS FOR PHASE TWO?**

11 A. Consistent with the *2025 Order*, Limestone Water continued to apply standalone
12 rates by system. The Phase Two rate design does not consolidate systems or alter the
13 system-specific rate structures approved by the Commission.

14
15 **Q. HOW WAS THE REMAINING REVENUE DEFICIENCY ALLOCATED IN**
16 **PHASE TWO?**

17 A. The remaining revenue deficiency was allocated using the same Commission-
18 approved methodology employed in Phase One. Phase Two rates were designed to
19 recover the balance of the Commission-approved revenue deficiency by applying
20 proportional increases consistent with the Phase One allocation, rather than
21 introducing new rate structures or reallocating costs among customer classes.
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1 **Q. HOW DID LIMESTONE WATER CALCULATE THE CARRYING**
2 **CHARGES IN ITS PHASE TWO DESIGN?**

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4 A. In the *2025 Order*, the Commission identified an overall revenue deficiency of
5 \$1,362,324 and approved Limestone Water to recover \$722,031.72 of that deficiency
6 through Phase One rates.⁶ As a result, the remaining unrecovered revenue deficiency
7 during the pendency of Phase One was \$640,292.28.⁷ Consistent with the
8 Commission’s directive, Limestone Water calculated carrying charges by applying
9 its Commission-approved overall Rate of Return of 8.488 percent to the remaining
10 deficiency, which results in carrying charges of \$54,348.01.

11
12
13 **Q. HOW ARE COMMERCIAL WASTEWATER CUSTOMERS TREATED**
14 **UNDER THE PHASE TWO RATE DESIGN?**

15
16 A. Commercial wastewater customers are billed based on Equivalent Residential Units
17 (“ERUs”), consistent with the tariff provisions approved by the Commission. As stated in
18 the tariff, “Equivalent Residential Units (“ERUs”) have been assigned to each Commercial
19 Customer utilizing typical wastewater flow rates derived from the Tennessee Department
20 of Environment and Conservation ‘Plans Review and Approval of Sewage Works
21 Construction Plans and Documents.’” This methodology provides a standardized and
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25 ⁶ *2025 Order* at 103-107.

26 ⁷ See Exhibit AS-3: Limestone Water’s proposed rate design for Phase Two.

1 Commission-approved basis for assigning ERUs to commercial customers based on
2 expected wastewater usage.

3
4 **Q. HAVE SOME ERU ASSIGNMENTS BEEN ADJUSTED PURSUANT TO**
5 **THE APPROVED TARIFF SINCE PHASE ONE IMPLEMENTATION?**

6 A. Yes. As commercial customers have presented updated information regarding their
7 operations, flow characteristics, or usage assumptions, Limestone Water has diligently
8 reviewed that information and updated ERU assignments where appropriate. When ERU
9 adjustments result in changes to billed amounts, the Company has provided
10 appropriate credits or refunds consistent with the tariff and standard billing practices.
11 This process ensures that commercial customers are billed accurately and in
12 accordance with the Commission-approved methodology.

13
14
15 **Q. CAN YOU PROVIDE AN EXAMPLE OF A CIRCUMSTANCE IN WHICH**
16 **THE COMPANY HAS REVIEWED ERU ASSIGNMENTS AT THE**
17 **REQUEST OF A COMMERCIAL CUSTOMER?**

18 A. Yes. I can use the correspondence attached to the Consumer Advocate Division's Motion
19 for Entry of a Procedural Schedule. Consistent with the Commission-approved tariff
20 and *2025 Order*, Limestone Water assigned ERUs to commercial wastewater
21 customers using planning-level estimates of typical wastewater flows derived from
22 recognized regulatory guidance when customer-specific usage or headcount data
23 were not available. Old Natchez Country Club is a private, multi-amenity facility,
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and Limestone Water does not have access to Old Natchez Country Club’s internal operational metrics, such as member check-ins, dining covers, pool usage, or event attendance. In the absence of such internal data, Limestone Water relied on publicly available indicators of facility scale and expected utilization, including publicly reported estimates of annual golf rounds, year-round operations, and publicly described amenities such as dining, tennis, pool facilities, and capacity for large social functions, all of which indicate materially higher daily wastewater-generating activity than a single residential equivalent. Based on those indicators, an initial ERU assignment was made consistent with the approved methodology and available information at the time.

Q. HOW DID LIMESTONE WATER RESPOND ONCE ADDITIONAL INFORMATION WAS PROVIDED BY THIS CUSTOMER?

A. Following Phase One implementation, Limestone Water engaged directly with Old Natchez Country Club to seek and evaluate more precise and reliable information regarding actual usage and guest volumes in order to consider a revision to the ERU assignment. Since the customer declined to provide internal attendance or sign-in data, Limestone Water utilized available water usage data as an alternative proxy to estimate average daily activity levels. Based on that information, Limestone Water updated the customer’s ERU assignment and issued a refund for amounts previously billed. This cooperative, yet verified, approach ensures that commercial customers

1 are ultimately billed based on the best available data while preserving the integrity
2 of the approved rate design.
3

4 **Q. HAS LIMESTONE WATER CONDUCTED A GENERAL REVIEW OF**
5 **COMMERCIAL CUSTOMER ERU ASSIGNMENTS SINCE PHASE ONE**
6 **IMPLEMENTATION?**
7

8 A. Yes. In connection with this Phase Two compliance filing, Limestone Water
9 performed a general review of all commercial customer ERU assignments, including
10 the most recent, up-to-date information available. This review incorporated updated
11 billing records, customer counts, and usage data where applicable, and reflects the
12 Company's continued, ongoing effort to ensure that commercial billing determinants
13 remain accurate and consistent with the Commission-approved methodology.
14

15 **Q. ARE THE RESULTS OF THIS RECENT GENERAL REVIEW REFLECTED**
16 **IN THIS FILING?**
17

18 A. Yes. The results of the updated commercial ERU review are reflected in the billing
19 determinants provided in Exhibit AS-2 and in the Phase Two rate design workbook
20 submitted with this filing. In conducting this review using the most current
21 information available, the Company identified certain instances in which proposed
22 ERU assignments differ from those reflected during Phase One, including instances
23 where proposed ERUs are higher based on updated and more complete data.
24 Importantly, these proposed ERU assignments are not implemented unilaterally, but
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1 are presented to the Commission for review, consideration, and approval as part of
2 this Phase Two compliance filing. Any changes to ERU assignments reflected herein
3 are therefore subject to Commission approval and are incorporated solely for
4 purposes of establishing billing determinants for the proposed Phase Two rates.
5

6 **Q. HAS LIMESTONE INCREASED ANY COMMERCIAL ERU**
7 **ASSIGNMENTS SINCE THE IMPLEMENTATION OF PHASE ONE?**

8
9 A. No. Any proposed increase to any commercial ERU assignment will be submitted to
10 the Commission for review and approval.

11 **Q. PLEASE DESCRIBE THE REVENUES COLLECTED BY MONTH, BY**
12 **SYSTEM.**

13
14 A. Limestone Water has provided, as Exhibit AS-1, a summary of revenues collected
15 by month and by system since implementation of Phase One rates. These figures
16 reflect actual billed and collected revenues and are presented separately for water
17 and wastewater service, where applicable.

18
19 **Q. PLEASE DESCRIBE THE BILLING DETERMINANTS PROVIDED WITH THIS**
20 **FILING**

21 A. As shown in Exhibit AS-2, Limestone Water has provided the latest available
22 monthly billing determinants by system, including customer counts and usage
23 volumes where applicable. These determinants are consistent with the Company's
24 billing practices and the methodologies approved in Phase One of this proceeding.
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Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

TN-Limestone

Exhibit AJS-1: Revenue Summary

June - December 2025

Billed Revenue

Water

	Revenue						
	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Candlewood	\$5,863	\$5,860	\$5,875	\$5,818	\$5,938	\$5,850	\$5,874
Aqua Utilities- 5/8"	\$16,139	\$18,023	\$18,320	\$19,413	\$19,520	\$17,998	\$16,292
Aqua Utilities- 3/4"	\$1,019	\$1,151	\$926	\$1,211	\$1,230	\$1,073	\$871
Aqua Utilities- 1"	\$413	\$245	\$353	\$366	\$209	\$205	\$390
Aqua Utilities- 1 1/2"	\$39	\$106	\$266	\$318	\$259	\$295	\$101
Aqua Utilities- 2"	\$52	\$47	\$38	\$37	\$3	\$35	\$65
Aqua Utilities- unknown	\$744	\$924	\$749	\$832	\$835	\$757	\$719
Total Water	\$24,268	\$26,354	\$26,527	\$27,995	\$27,993	\$26,213	\$24,311

Sewer

Aqua Utilities-Residential	\$15,974	\$12,141	\$14,076	\$14,048	\$14,033	\$14,042	\$14,136
Aqua Utilities-Commercial	\$1,303	\$1,303	\$1,303	\$1,303	\$1,303	\$1,268	\$1,268
Cartwright - Grassland - Comm 1-2 Bedroom	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Cartwright - Grassland - Res 1-2 Bedroom	\$2,455	\$2,526	\$2,564	\$2,627	\$2,306	\$2,283	\$2,254
Cartwright - Grassland - Res 3 Bedroom	\$20,387	\$20,310	\$20,265	\$20,301	\$20,283	\$20,041	\$20,341
Cartwright - Grassland - Res 4 Bedroom	\$14,802	\$14,891	\$14,958	\$14,673	\$14,796	\$14,733	\$14,813
Cartwright - Grassland - Res 5 Bedroom	\$622	\$622	\$626	\$626	\$622	\$622	\$643
Cartwright - Commercial	\$34,965	\$36,196	\$35,807	-\$4,250	\$19,662	\$24,240	\$24,363
Cartwright - Arrington/Hardeman/Hideaway -Res	\$34,062	\$33,699	\$34,013	\$34,065	\$33,555	\$34,225	\$34,378
Chapel Woods	\$6,064	\$6,101	\$6,162	\$6,176	\$6,100	\$6,139	\$6,116
Shiloh Falls - Residential	\$9,000	\$8,966	\$8,887	\$8,958	\$8,984	\$8,974	\$8,923
Shiloh Falls - Commercial	\$7,356	\$7,464	\$7,464	\$7,464	\$7,464	\$7,464	\$7,464
Lakeside Estates (DSH) - Commercial	\$7,739	\$7,825	\$7,462	\$7,663	\$7,663	\$7,663	\$7,663
Lakeside Estates (DSH) - Residential	\$345	\$348	\$350	\$352	\$478	\$427	\$465
Total Sewer	\$155,075	\$152,391	\$153,938	\$114,007	\$137,250	\$142,122	\$142,830

Total Billed Revenue

	\$179,343	\$178,745	\$180,464	\$142,003	\$165,243	\$168,335	\$167,141
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TN-Limestone

AJS-2: Billing Determinants

Proposed Updated Annual ERU Billing
Determinates

		12-Month ending December 31, 2025	Phase 1 Rates	Current Revenue	Feb 2026 - Monthly	
		Billing Determinates			Billing Determinate	
Water						
Candlewood	Res	1,262	\$50.00	\$63,078	110	
Aqua Utilities- 5/8"	Res/Com	4,787	\$31.00	\$148,382	410	
Aqua Utilities - 3/4"	Res/Com	234	\$31.00	\$7,263	22	
Aqua Utilities - 1"	Res/Com	88	\$31.00	\$2,716	10	
Aqua Utilities- 1 1/2"	Res/Com	12	\$31.00	\$370	1	
Aqua Utilities- 2"	Res/Com	10	\$31.00	\$317	1	
Aqua Utilities - Unknown	Res/Com	218	\$31.00	\$6,772	19	
Total Water		6,611		\$228,898	573	
Usage						
Aqua Utilities (1000 gallons)	Res/Com	14,033,940	\$3.05	\$42,804	403,398	
				\$42,804		
Sewer						
Aqua Utilities	Res	4,507	\$35.00	\$157,733	378	
Aqua Utilities	Com	441	\$35.00	\$15,420	36	444
Cartwright -Grasslands 1-2 Bedroom	Res	424	\$65.00	\$27,580	33	
Cartwright - Grasslands 3 Bedroom	Res	3,336	\$70.00	\$233,547	274	
Cartwright - Grasslands 4 Bedroom	Res	2,277	\$75.00	\$170,758	188	
Cartwright - Grasslands 5 Bedroom	Res	96	\$75.00	\$7,220	8	
Cartwright	Com	1,713	\$168.96	\$289,462	136	2736
Cartwright - Arrington/Hardeman/Hideway	Res	5,144	\$75.00	\$385,819	442	
Chapel Woods	Res	1,695	\$40.00	\$67,815	140	
Shiloh Falls	Res	3,947	\$25.00	\$98,677	323	
Shiloh Falls	Com	1,584	\$55.60	\$88,070	132	756
Lakeside Estates (DSH)	Com	1,645	\$55.00	\$90,451	137	2232
Lakeside Estates (DSH)	Res	67	\$55.00	\$3,703	9	
		26,877		\$1,636,256	2,236	6,168
Total Sewer				\$1,679,059		

LIMESTONE WATER OPERATING COMPANY
AJS-3: Proposed Phase 2 Rate Design

	Filed Determinants (Customers)	Phase 1 Rate	Phase 1 Calculated Revenue	2025 Actual Determinants (Customers)	Calculated Revenue Based on 2025 Determinants	Phase 2 Attrition Determinants (Customers)	Phase 2 Proposed Rate	Phase 2 Calculated Revenues	Phase 2 Revenue Increase
Water									
Candlewood	1,452	\$50.00	\$72,600	1,262	\$63,100	1,262	\$85.80	\$108,237	\$35,637
Aqua Utilties- 5/8"	5,016	\$31.00	\$155,496	4,787	\$148,397	4,787	\$46.86	\$224,318	\$68,822
Aqua Utilties- 3/4"	120	\$31.00	\$3,720	234	\$7,254	234	\$46.86	\$10,980	\$7,260
Aqua Utilties- 1"	12	\$31.00	\$372	88	\$2,728	88	\$46.86	\$4,106	\$3,734
Aqua Utilties- 1 1/2"	12	\$31.00	\$372	12	\$372	12	\$46.86	\$559	\$187
Aqua Utilties- 2"	36	\$31.00	\$1,116	10	\$310	10	\$46.86	\$479	-\$637
Aqua Utilties- unknown	228	\$31.00	\$7,068	218	\$6,758	218	\$46.86	\$10,237	\$3,169
Usage:									
Candlewood - No meter - (Flat Rate)	0		\$0	0	\$0	0		\$0	\$0
Aqua Utilties - usage per 1,000 gallons	21,240,360	\$3.05	\$64,783	14,033,940	\$42,804	14,033,940	\$3.05	\$42,804	-\$21,980
Total Bill Revenue	6,876		\$305,527	6,611	\$271,723	6,611		\$401,721	\$96,194
Sewer									
Aqua Utilties-Residential	4,440	\$35.00	\$155,400	4,507	\$157,733	4,507	\$46.70	\$210,447	\$55,047
Aqua Utilties-Commercial	432	\$35.00	\$15,119	441	\$15,420	444	\$46.70	\$20,733	\$5,614
Cartwright - Grassland - Comm 1-2 Bedroom	0	\$0.00	\$0	0	\$0	0	\$0.00	\$0	\$0
Cartwright - Grassland - Res 1-2 Bedroom	408	\$65.00	\$26,520	424	\$27,580	424	\$84.74	\$35,954	\$9,434
Cartwright - Grassland - Res 3 Bedroom	3,348	\$70.00	\$234,360	3,336	\$233,547	3,336	\$95.23	\$317,733	\$83,373
Cartwright - Grassland - Res 4 Bedroom	2,304	\$75.00	\$172,800	2,277	\$170,759	2,277	\$102.84	\$234,134	\$61,334
Cartwright - Grassland - Res 5 Bedroom	96	\$75.00	\$7,200	96	\$7,220	96	\$102.84	\$9,900	\$2,700
Cartwright - Commercial	2,496	\$168.96	\$421,712	1,713	\$289,462	2,736	\$208.97	\$571,734	\$150,022
Cartwright - Arrington/Hardeman/Hideaway -Res	5,316	\$75.00	\$398,700	5,144	\$385,820	5,144	\$105.08	\$540,536	\$141,836
Chapel Woods	1,740	\$40.00	\$69,600	1,695	\$67,815	1,695	\$55.66	\$94,360	\$24,760
Shiloh Falls - Residential	3,816	\$25.00	\$95,400	3,947	\$98,677	3,947	\$32.77	\$129,338	\$33,938
Shiloh Falls - Commercial	1,644	\$55.60	\$91,406	768	\$42,701	756	\$163.92	\$123,924	\$32,518
Lakeside Estates (DSH) - Commercial	1,716	\$55.00	\$94,384	1,645	\$90,451	2,232	\$57.60	\$128,556	\$34,172
Lakeside Estates (DSH) - Residential	60	\$55.00	\$3,300	67	\$3,704	67	\$57.60	\$3,879	\$579
Total Bill Revenue	27,816		\$1,785,901	26,061	\$1,590,887	27,662		\$2,421,229	\$635,328
Imputed Cartwright - Commercial			\$91,230		\$0			\$0	
Other Revenue: Staff Rate Design Exhibit 1, Page 2			\$231,599		\$231,599			\$231,599	
Surcharge Carrying Cost									
Water						6611	\$1.24	\$8,165	
Sewer						27662	\$1.67	\$46,183	
Totals			\$2,414,257		\$2,094,208			\$3,108,897	\$731,522
Overall Staff Revenue Deficiency				\$	\$			\$1,362,324	
Phase One Increase of Rate Design								53.00%	
Revenue Needed From Phase One								\$722,032	
Phase Two Increase								\$640,292	

	Staff Deficiency	Phase 1 Increase	Phase 1 % Increase	Phase 2 Increase	Imputed Cartwright - Commercial	Total Phase 2 Increase in Base	Carrying Cost
Water	\$432,751	\$108,474	15.02%	\$96,194	\$0	\$96,194	\$8,165
Sewer	\$929,573	\$613,558	84.98%	\$544,098	\$91,230	\$635,328	\$46,183
	\$1,362,324	\$722,032		\$640,292	\$91,230	\$731,522	\$54,348

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

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)
[PHASE 2 INCREASE])

DOCKET NO. 24-00044

VERIFICATION

STATE OF Missouri)
COUNTY OF St. Louis)

I, AARON SILAS, being duly sworn, state that I am authorized to testify on behalf of Limestone Water Utility Operating Company, LLC in the above-referenced docket, that if present before the Commission and duly sworn, my testimony would be as set forth in my pre-filed testimony in this matter, and that my testimony herein is true and correct to the best of my knowledge, information, and belief.

Aaron Silas
AARON SILAS

Sworn to and subscribed before me
this 2 day of March, 2026.

[Signature]
Notary Public

My Commission Expires: 11-24-2029



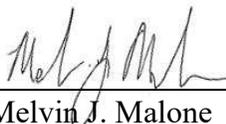
CERTIFICATE OF SERVICE

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

Karen H. Stachowski, Esq.
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Consumer Advocate Division
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This the 2nd day of March 2026.



Melvin J. Malone