

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

**IN RE:** )  
)  
**PETITION OF LIMESTONE WATER** )  
**UTILITY OPERATING COMPANY,** )  
**LLC TO INCREASE CHARGES, FEES** ) **DOCKET NO. 24-00044**  
**AND RATES AND FOR APPROVAL OF** )  
**A GENERAL RATE INCREASE AND** )  
**CONSOLIDATED RATES [PHASE 2** )  
**INCREASE]** )

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**CONSUMER ADVOCATE’S FIRST SET OF DISCOVERY REQUESTS  
TO LIMESTONE WATER UTILITY OPERATING COMPANY, LLC**

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Pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11, the Consumer Advocate Division of the Office of the Tennessee Attorney General (the “Consumer Advocate”), by and through counsel, propounds the following First Set of Discovery Requests to Limestone Water Utility Operating Company, LLC (“Limestone” or the “Company”) and its parent company, Central States Water Resources, Inc. (“CSWR”).

The Company shall serve full and complete responses in accordance with the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Vance Broemel, on or before 2:00 p.m. (CDT), March 18, 2026.

## PRELIMINARY MATTERS AND DEFINITIONS

1. **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.

2. **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3. **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4. **Objections.** If any objections to this discovery are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5. **Singular/Plural.** The singular shall include the plural, and vice versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) “You,” “Your,” “Company,” “Buyer,” or “Limestone,” shall mean Limestone Water Utility Operating Company, LLC and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(b) “Central States Water” or “CSWR” shall mean Central States Water Resources, Inc. and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(c) “Affiliate” shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater clarification, “control” is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term “Affiliate” shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an “Affiliate.”

(d) “Communication” shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings and personal conversations, or otherwise.

(e) “Document” shall have the broadest possible meaning under applicable law. “Document” shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made.

(f) “Person” shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(g) “Identify” with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person’s relationship, whether business, commercial, professional, or personal with you;
- ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);
- iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
- iv. Any oral communication, means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.

(h) “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.

(i) “Including” shall be construed to mean including but not limited to.

### **FIRST SET OF DISCOVERY REQUESTS**

**1-1. Source & Support and Rationale.** Refer to the following documents filed on March 2, 2026:

- Direct Testimony of Aaron Silas at 8:6-11, Exhibit “AJS-3: Proposed Phase 2 Rate Design.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”

The referenced spreadsheet calculates the Company's proposed rates for Phase 2. Specifically, refer to Rows 41 to 43 of this spreadsheet which calculates the carrying cost surcharges of \$1.24 for water customers and \$1.67 for sewer customers. In the testimony of Mr. Silas, he states:<sup>1</sup>

- a. As a result, the remaining unrecovered revenue deficiency during the pendency of Phase 1 was \$640,292.28. Consistent with the Commission's directive, Limestone Water calculated carrying charges by applying deficiency, which results in carrying charges of \$54,348.01
- b. Explain the Company's rationale for designing carrying cost surcharges that recover these costs in a single year.
- c. Explain how this calculation is consistent with the method as set forth in the "Commission's directive" referred to in Mr. Silas' testimony.
- d. Does Limestone intend to terminate the carrying charge at the end of one year? If not, when will the carrying charge terminate?

**RESPONSE:**

**1-2. Source & Support.** Refer to the following documents filed on March 2, 2026:

- Direct Testimony of Aaron Silas at 8:17 – 9:2; Exhibit "AJS-3: Proposed Phase 2 Rate Design."
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs "AJS 3 Rate Design Phase 2" and "Confidential Commercial ERU Data."

In the referenced testimony, Mr. Silas states:

As stated in the tariff, "Equivalent Residential Units ("ERUs") have been assigned to each Commercial Customer utilizing typical wastewater flow rates derived from the Tennessee Department of Environment and Conservation 'Plans Review and Approval of Sewage Works Construction Plans and Documents.'" This methodology provides a standardized and Commission-approved basis for assigning ERUs to commercial customers based on expected wastewater usage.

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<sup>1</sup> The Consumer Advocate notes that although the Phase 2 Excel spreadsheet is marked CONFIDENTIAL, the first 3 tabs of the spreadsheet are also attached to the PUBLIC Direct Testimony of Aaron Silas as exhibits. ("AJS 1 Monthly Revenue"; "AJS 2 Determinants Worksheet"; and "AJS-3: Proposed Phase 2 Rate Design").

Respond to the following:

- a. Provide the values for each component and calculations or analysis used to determine the ERU for each customer.
- b. If the ERU was estimated, provide the values used to create the estimate.

**RESPONSE:**

**1-3. Source & Support and Explanation.** Refer to the following documents filed on separate dates with TPUC:

- Direct Testimony of Aaron Silas at 9:15,10:16 – 11:2, Exhibit “AJS-3: Proposed Phase 2 Rate Design” (March 2, 2026).
- Phase 1 Excel spreadsheet, File <CONFIDENTIAL Final Limestone Rate Design – 5.13 Proposed Redistribution.xlsx>, Tab “CONFIDENTIAL Commercial ERU Data,” Column M (May 19, 2025).<sup>2</sup>
- For ease of comparing the spreadsheets filed by Limestone on May 19, 2026 (Tab “Comm Customer Bills,” Columns G, K, L, M) and March 2, 2026 (Tab “CONFIDENTIAL Commercial ERU Data”), the Consumer Advocate created a table combining information from the two filings attached as CONFIDENTIAL Exhibit CA DR 1-3.

In Mr. Silas’ testimony referenced above, he poses the following question:

**Q:** CAN YOU PROVIDE AN EXAMPLE OF A CIRCUMSTANCE IN WHICH THE COMPANY HAS REVIEWED ERU ASSIGNMENTS AT THE REQUEST OF A COMMERCIAL CUSTOMER?

In his response to this Question, Mr. Silas raises the example of discussion with its commercial customer, Old Natchez Country Club. Mr. Silas’ described the details of the exchange with this commercial customer as follows:

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

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<sup>2</sup> *Id.*

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

Provide responses to the following:

- a. Provide the "available water usage data" used to update the customer's ERU assignment.
- b. Explain how Limestone obtained the water usage data.
- c. Explain why water usage data is an "alternative proxy" to estimate average daily activity levels.
- d. Explain why water usage data is not a preferred method for estimating wastewater volumes when wastewater is not directly measured.
- e. Provide copies of all communication between Limestone representatives and representatives of Old Natchez Country Club.<sup>3</sup>
- f. Provide copies of all communication between Limestone representatives and representatives of [REDACTED].
- g. Explain why the values in Column K and Column L have not changed for this customer?
- h. Are there other customers whose initial values have changed and are not reflected on this schedule?
- i. Provide copies of all communication or contact that Limestone has had with customers inquiring about their rates or rate changes since the implementation of Phase 1.

**RESPONSE:**

**1-4. Source & Support and Explanation.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas at 12:5-9; Exhibits "AJS-3: Proposed Phase 2 Rate Design" and "AJS-3: Proposed Phase 2 Rate Design."

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<sup>3</sup> The Consumer Advocate did not redact the name of the Natchez Trace Country Club since it was referenced in the Consumer Advocate's Motion For Entry of a Procedural Schedule (February 4, 2026) and the Public Comment filed by Glynn Taylor about the increased commercial rates including the documents filed by the Consumer Advocate on behalf of Mr. Taylor (March 10, 2026).

- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”<sup>4</sup>

In the referenced testimony, Mr. Silas poses the following question and response:

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

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

Provide responses to the following:

- a. On Exhibit AJS-3, for Commercial Customers, reconcile 2025 Actual Determinants, Column I, (approximately 381 (monthly)) with the Phase 2 Attrition Determinants, Column M (approximately 514 (monthly)). Explain the increase in the number of determinates, specifically, what caused the increase?
- b. On Exhibit AJS-3, explain and provide the values that resulted in the increase of 1,023 determinates from actual to Phase 2 for Cartwright.
- c. Explain and provide the values that resulted in the increase of 587 determinates from actual to Phase 2 for Lakeside Estates.
- d. Will the billing ERUs be based on 2025 Actual Determinates or the Phase 2 Attrition Determinates?
- e. Reconcile the increase (and changes) in the ERU Values in Exhibit AJS-3 with the statement that Limestone has not increased any commercial ERU assignments since the implementation of Phase 1.
- f. Confirm that the Phase 2 Proposed Rate increases rates by as much as 40% for some residential customers (Cartwright - Arrington/Hardeman/Hideaway -Res Phase 1 Rate of \$75, Phase 2 Proposed rate of \$105.08) and as much as 195% for some commercial customers (Shiloh Falls – Commercial: Phase 1 Rate of \$55.60 and Phase 2 Proposed rate of \$163.92). If this is not confirmed, explain why it is not confirmed and the actual rate increases.

**RESPONSE:**

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<sup>4</sup>

*Id.*

**1-5. Source & Support and Explanation.** Refer to the Direct Testimony of Aaron Silas, Exhibit “AJS-3: Proposed Phase 2 Rate Design” filed on March 2, 2026. Respond to the following:

- a. Explain how new commercial customers can estimate their bills using the proposed ERUs. Provide the information available to new commercial customers in estimating their bills.
- b. Explain how commercial customers can determine if their bill is accurate or question appropriate ERUs used to calculate the bill.
- c. Explain how Limestone is providing accurate and understandable price signals to commercial customers with this rate design such that a commercial customer can respond to alter behavior to influence future bills.

**RESPONSE:**

**1-6. Source & Support.** Refer to the *Order Setting Utility Rates*, Commission’s Exhibit, Attachment No. 4, “Commission Rate Design Exhibit, Page 1,” TPUC Docket No. 24-00044 (July 10, 2025). For each commercial customer provide:

- a. A copy of a bill prior to the implementation of Phase 1.
- b. A copy of a bill issued after Phase 1 rates were implemented.
- c. An estimate of a bill after Phase 2 is implemented.

**RESPONSE:**

**1-7. Source & Support.** Refer to Direct Testimony of Aaron Silas at 8:17 – 9:2 filed on March 2, 2026. Mr. Silas states:

As stated in the tariff, “Equivalent Residential Units (“ERUs”) have been assigned to each Commercial Customer utilizing typical wastewater flow rates derived from the Tennessee Department of Environment and Conservation ‘Plans Review and Approval of Sewage Works Construction Plans and Documents.’

Provide a copy of the TDEC report cited that provides the basis for assigning ERUs to each commercial customer.

**RESPONSE:**

**1-8. Source & Support.** Refer to Company’s TPUC filing in this Docket on May 5, 2025. Specifically, Phase 1 Excel spreadsheet, File <CONFIDENTIAL Final Limestone Rate Design – 5.13 Proposed Redistribution.xlsx>, Tab “Comm Customer Bills.” This spreadsheet provides the basis for the ERUs used for the Phase 1 rate design for commercial customers. Provide the source and support for the “Units” or ERUs that were calculated for each commercial customer on this spreadsheet.

**RESPONSE:**

**1-9. Source & Support.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas at 12:5-9; Exhibits “AJS-1 Monthly Revenue.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “AJS 1 Monthly Revenue.”<sup>5</sup>

This referenced spreadsheet provides the Company’s monthly revenues from June 2025 to December 2025 by tariff element. Provide the source and support for this information which appear as unreferenced hard-coded values.

**RESPONSE:**

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<sup>5</sup> The Consumer Advocate notes that although the Phase 2 Excel spreadsheet is marked CONFIDENTIAL, the first 3 tabs of the spreadsheet are also attached to the PUBLIC Direct Testimony of Aaron Silas as exhibits. (“AJS 1 Monthly Revenue”; “AJS 2 Determinants Worksheet”; and “AJS-3: Proposed Phase 2 Rate Design”).

**1-10. Source & Support.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas, Exhibit “AJS 2 Determinants Worksheet.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “AJS 2 Determinants Worksheet.”<sup>6</sup>

Specifically, refer to Column C of the referenced spreadsheet that provides the Company’s billing determinants for 2025. Provide the source and support for this information which appear as unreferenced hard-coded values.

**RESPONSE:**

**1-11. Source & Support.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas, Exhibit “AJS 2 Determinants Worksheet.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “AJS 2 Determinants Worksheet.”<sup>7</sup>

Specifically refer to Column G of the referenced spreadsheet that provides the Company’s billing determinants for February 2026. Provide the source and support for this information which appear as unreferenced hard-coded values.

**RESPONSE:**

**1-12. Rationale.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas, Exhibits “AJS-3: Proposed Phase 2 Rate Design” and “AJS-3: Proposed Phase 2 Rate Design.”

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”<sup>8</sup>

Specifically, refer to Column L of the referenced spreadsheet which contains the Phase 2 billing determinants. Explain the Company’s rationale for updating the billing determinants for Phase 2 from what the Commission previously approved for Phase 1.

**RESPONSE:**

**1-13. Rationale.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas, Exhibits “AJS-3: Proposed Phase 2 Rate Design” and “AJS-3: Proposed Phase 2 Rate Design.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”<sup>9</sup>

Specifically, refer to Row 18 of the referenced spreadsheet which contains the usage rate calculation for Aqua Utilities. It appears that the Company has not allocated any of the rate increase to usage rates, and instead only allocated cost increases to fixed charges. Explain the Company’s rationale for not allocating costs to usage rates for the Phase 2 rate design.

**RESPONSE:**

**1-14. Rationale.** Refer to the following documents filed on March 2, 2026, with TPUC:

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<sup>8</sup> *Id.*

<sup>9</sup> The Consumer Advocate notes that although the Phase 2 Excel spreadsheet is marked CONFIDENTIAL, the first 3 tabs of the spreadsheet are also attached to the PUBLIC Direct Testimony of Aaron Silas as exhibits. (“AJS 1 Monthly Revenue”; “AJS 2 Determinants Worksheet”; and “AJS-3: Proposed Phase 2 Rate Design”).

- Direct Testimony of Aaron Silas, Exhibits “AJS-3: Proposed Phase 2 Rate Design” and “AJS-3: Proposed Phase 2 Rate Design.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”<sup>10</sup>

Specifically, refer to Row 38 of the referenced spreadsheet which contains the imputed usage revenue of \$91,230 for Cartwright Creek commercial customers. It appears that the Company has eliminated this imputed revenue in the Phase 2 rate design. Explain the Company’s rationale eliminating this imputed revenue.

**RESPONSE:**

**1-15. Source & Support.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas; Exhibits “AJS-3: Proposed Phase 2 Rate Design” and “AJS-3: Proposed Phase 2 Rate Design.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”<sup>11</sup>

The referenced spreadsheet calculates the Company’s proposed rates for Phase 2. Specifically refer to Cell H33 of this spreadsheet which contains a value of “768” as the billing determinants for Shiloh Falls commercial customers. Provide the source and support for this amount which unreferenced hard-coded values in the formula.

**RESPONSE:**

**1-16. Rationale.** Refer to the following documents filed on March 2, 2026, with TPUC:

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<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

- Direct Testimony of Aaron Silas, Exhibits “AJS-3: Proposed Phase 2 Rate Design” and “AJS-3: Proposed Phase 2 Rate Design.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”

The referenced spreadsheet calculates the Company’s proposed rates for Phase 2. Specifically refer to Rows 55 to 58 of this spreadsheet which allocates the Phase 2 revenue increase as shown in the table below.<sup>12</sup>

<b>Service</b>	<b>Revenue Deficiency</b>	<b>Phase 1 Increase</b>	<b>Phase 1 Percent</b>	<b>Phase 2 Increase</b>
Water	\$432,751	\$108,474	15.02%	\$96,194
Sewer	929,573	613,558	84.98%	544,098
<b>Total</b>	<b>\$1,362,324</b>	<b>\$722,032</b>	<b>100.00%</b>	<b>\$640,292</b>

As shown on the table above, the Company has allocated the remaining Phase 2 revenue deficiency of \$640,292 on the basis of the percentages applied in Phase 1 rather than using the remaining revenue deficiency calculated by the Commission as shown in the table below.

<b>Service</b>	<b>Revenue Deficiency</b>	<b>Less Phase 1 Increase</b>	<b>Phase 2 Increase</b>
Water	\$432,751	\$108,474	\$324,277
Sewer	929,573	613,558	316,015
<b>Total</b>	<b>\$1,362,324</b>	<b>\$722,032</b>	<b>\$640,292</b>

The percentage methodology used by the Company understates the increase to water customers while overstating the increase to sewer customers from the amount that was

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<sup>12</sup> Although these numbers in the above-referenced tables are in the CONFIDENTIAL Excel spreadsheet, the numbers are also located in the PUBLIC Direct Testimony of Aaron Silas, Exhibit “AJS-3: Proposed Phase 2 Rate Design.” Therefore, the Consumer Advocate is not redacting these numbers.

found appropriate by the Commission. Explain the Company’s rationale for departing from the allocated increase allowed by the Commission.

**RESPONSE:**

**1-17. Rationale.** Refer to the following documents filed on March 2, 2026, with TPUC:

- Direct Testimony of Aaron Silas, Exhibits “AJS-3: Proposed Phase 2 Rate Design” and “AJS-3: Proposed Phase 2 Rate Design.”
- Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tabs “AJS 3 Rate Design Phase 2” and “Confidential Commercial ERU Data.”

The referenced spreadsheet calculates the Company’s proposed rates for Phase 2. Specifically, refer to Rows 55 to 58 of this spreadsheet which allocates the imputed commercial revenues for Cartwright Creek as shown in the table below.<sup>13</sup>

<b>Service</b>	<b>Phase 2 Increase</b>	<b>Cartwright Creek</b>	<b>Total Phase 2</b>
Water	\$96,194	\$0	\$96,194
Sewer	544,098	91,230	635,328
<b>Total</b>	<b>\$640,292</b>	<b>\$91,230</b>	<b>\$731,522</b>

Allocating the Cartwright Creek commercial imputed revenues in this manner has the impact of requiring all commercial customers to share in the costs that were previously borne only by Cartwright Creek commercial customers. Explain the Company’s rationale for allocating Cartwright Creek commercial imputed revenues in this manner.

**RESPONSE:**

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<sup>13</sup> *Id.*

**1-18. Source & Support.** Refer to Company’s filing on March 2, 2026, Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “CONFIDENTIAL Commercial ERU Data.” The referenced spreadsheet provides the ERU billing determinant support for commercial customers. Provide the support for the “Units (Design Basis)” data shown in Column G for each commercial customer.

**RESPONSE:**

**1-19. Source & Support.** Refer to Company’s filing on March 2, 2026, Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “CONFIDENTIAL Commercial ERU Data.” This spreadsheet provides the ERU billing determinant support for commercial customers. Provide the support for the “ERU” data shown in Column K for each commercial customer.

**RESPONSE:**

**1-20. Source & Support.** Refer to Company’s filing on March 2, 2026, Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “CONFIDENTIAL Commercial ERU Data” that was included with the filing. This spreadsheet provides the ERU billing determinant support for commercial customers. Provide the support for the “Current ERU” data shown in Column L for each commercial customer.

**RESPONSE:**

**1-21. Source & Support.** Refer to Company’s filing on March 2, 2026, Phase 2 Excel spreadsheet, File <CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx>, Tab “CONFIDENTIAL Commercial ERU Data.” This spreadsheet provides the ERU billing determinant support for commercial customers. Provide an explanation of the term “Commercial Customer Code” and the corresponding numbers in Column B

**RESPONSE:**

**RESPECTFULLY SUBMITTED,**



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**KAREN H. STACHOWSKI** (BPR No. 019607)

Deputy Attorney General

**VANCE L. BROEMEL** (BPR No. 011421)

Senior Assistant Attorney General

**SHILINA B. BROWN** (BPR No. 020689)

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**TPUC Docket No. 24-00044 Phase 2**

*CA's 1<sup>st</sup> DR to Limestone*

**CERTIFICATE OF SERVICE**

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

Melvin J. Malone  
The Pinnacle at Symphony Place  
150 3rd Avenue South, Suite 1600  
Nashville, TN 37201  
[melvin.malone@butlersnow.com](mailto:melvin.malone@butlersnow.com)

Russ Mitten  
David Woodsmall  
General Counsel – Central States Water Resources  
CSWR, LLC  
1630 Des Peres Road, Suite 140  
St. Louis, MO, 63131  
[dwoodsmall@cswrgroup.com](mailto:dwoodsmall@cswrgroup.com)

This the 11<sup>th</sup> day of March, 2026

Vance L. Broemel 

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**VANCE L. BROEMEL**  
Senior Assistant Attorney General

**EXHIBIT CA DR 1-3**

**CONFIDENTIAL**