

# BUTLER | SNOW

March 18, 2026

Electronically Filed in TPUC Docket  
Room on March 18, 2026 at 2:11 p.m.

**VIA ELECTRONIC FILING**

Hon. David Jones, Chairman  
Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto: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 Responses to Consumer Advocate's First Set of Discovery Requests* in the above-captioned matter.

Please note that Request No. 1-3 and Response Attachment Nos. 1-3, 1-6, 1-8, 1-9, and 1-18 contain **CONFIDENTIAL INFORMATION** and are being submitted **UNDER SEAL** as **CONFIDENTIAL** and **PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of these are attached.

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

Attachments

cc: Russ Mitten, Central States Water Resources  
Dave Woodsmall, Central States Water Resources  
Karen H. Stachowski, Consumer Advocate Division  
Vance L. Broemel, Consumer Advocate Division  
Shilina B. Brown, Consumer Advocate Division

*Neuhoff Building  
1320 Adams Street, Suite 1400  
Nashville, TN 37208*

MELVIN J. MALONE  
615.651.6705  
C 615.948.7801  
[melvin.malone@butlersnow.com](mailto:melvin.malone@butlersnow.com)

T 615.651.6700  
F 615.651.6701  
[www.butlersnow.com](http://www.butlersnow.com)

BUTLER SNOW LLP

**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**

---

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

---

Limestone Water Utility Operating Company, LLC (“Limestone”), by and through counsel, hereby submits its Responses to the First Set of Discovery Requests propounded by the Consumer Advocate Division of the Attorney General’s Office (“Consumer Advocate” or “CAD”).

**GENERAL OBJECTIONS**

1. Limestone objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.
2. Limestone objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission (“TPUC”).

3. The specific responses set forth below are based on information now available to Limestone, and Limestone reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. Limestone objects to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. Limestone objects to each request to the extent it seeks information outside Limestone's custody or control.

6. Limestone's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of Limestone's General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. Limestone objects to those requests that seek the identification of "any", or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.

8. Limestone objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. Limestone does not waive any previously submitted objections to the Consumer Advocate's discovery requests.

## RESPONSES 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:**

- a. As reflected in Mr. Silas’ testimony and Exhibit AJS3, the remaining unrecovered revenue deficiency during the pendency of Phase 1 was \$640,292.28. Consistent with the Commission’s directive, Limestone Water applied its Commission approved overall rate of return to the unrecovered deficiency, resulting in total carrying charges of \$54,348.01.

---

<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”).

- b. Limestone Water designed the carrying cost surcharge to recover the approved carrying charges within a single year because the surcharge amounts are modest and recovering the carrying charges over a one year period ensures that the surcharge drops off customer bills in a timely manner once the approved carrying costs have been fully recovered. Under the proposed design, the monthly surcharge equates to approximately \$1.24 for water customers and \$1.67 for sewer customers.
- c. The calculation is consistent with the Commission’s directive because Limestone Water applied the Commission approved rate of return to the remaining unrecovered revenue deficiency for the period during which Phase 1 rates were in effect and recovery was deferred. The surcharge is a mechanical recovery of those carrying charges and does not modify any Commission approved methodology.
- d. Yes. Limestone Water intends to terminate the carrying cost surcharge once the total approved carrying charges of \$54,348.01 have been recovered. The surcharge is not intended to be permanent and will be removed from customer bills upon full recovery of the carrying charges.

**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.

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:**

- a. The values and calculations used to determine the Equivalent Residential Units (“ERUs”) assigned to each commercial customer are provided in the Company’s Phase 2 filing. Specifically, the tab labeled “**Confidential** Commercial ERU Data” in the file CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design.xlsx identifies, for each commercial customer, the facility type, applicable design basis, typical flow assumptions, and resulting ERU multiplier used in the Phase 2 rate design.

In addition, Attachment 1-2 provides a reference table summarizing the design basis, typical flow values, ERU multipliers, and source documents by facility type, consistent with the methodology described in the Company’s tariff and testimony.

- b. All such values can be found in the “**Confidential** Commercial ERU Data” tab of the Phase 2 Excel spreadsheet.

**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 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.

---

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

- 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:**

- a. The available water usage data used to evaluate Old Natchez Country Club’s ERU assignment are attached to this response as “ **CONFIDENTIAL** 1-3 Water Usage Info”.
- b. Limestone obtained the water usage data from a combination of information provided by the commercial customer and billing and usage records available through Harper Valley Utility District (“HVUD”) customer service.
- c. For this customer, the applicable ERU design basis is guest count. Because Old Natchez Country Club was unable or unwilling to provide daily guest check-in or attendance data—which would be the most accurate basis—Limestone used available water usage data as an alternative proxy to estimate average daily guest activity. In the absence of direct attendance information, water usage represented the best available data to inform the review.
- d. Water usage data is not a preferred method for estimating wastewater volumes because ERU design bases vary by facility type. For example, some commercial entities are

---

<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).

assigned ERUs based on seats, alleys, or other non-usage measures. In those cases, water usage data would not reliably estimate the applicable design basis.

- e. Please see the **CONFIDENTIAL** attached emails as well as the Company’s response to subpart (i) for all available communication between 5.1.2025 and 3.2.2026.
- f. Please see the **CONFIDENTIAL** attachment for all account logs between 5.1.2025 and 3.2.2026.
- g. The values in Columns K and L did not change because those values were updated prior to the March 2, 2026 filing. Column K therefore reflects the most current information in the Company’s billing system at the time of filing.
- h. Any other changes to customer specific values reflected in the Phase 2 filing are captured in the “**Confidential Commercial ERU Data**” tab. The Company did round down when implementing the ERUs for the sake of flat values.
- i. Limestone has produced the attached **CONFIDENTIAL** log of customer contacts responsive to this request. The attachment reflects customer service and billing system records identified by searching for inquiries relating to or containing the terms “rate inquiry,” “rate increase,” and “ERU.” Entries unrelated to rate or ERU inquiries were excluded. The produced log reflects Limestone’s records of customer contacts regarding rates or rate changes since implementation of Phase 1.

**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.”

- 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:

- 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?
- 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.
- Explain and provide the values that resulted in the increase of 587 determinates from actual to Phase 2 for Lakeside Estates.
- Will the billing ERUs be based on 2025 Actual Determinates or the Phase 2 Attrition Determinates?
- 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.
- 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:**

- The difference between the 2025 Actual Determinants in Column I and the Phase 2 Attrition Determinants in Column M reflects updates identified through the ERU assignment review process described on pages 8–11 of Mr. Silas’ Direct Testimony.

---

<sup>4</sup> *Id.*

The Phase 2 attrition determinants incorporate updated customer and facility information obtained after Phase 1 implementation and reflected in the tab labeled **“Confidential Commercial ERU Data.”**

- b. For Cartwright Creek, the increase of approximately 1,023 determinants from actuals to Phase 2 is primarily attributable to three customers: two schools and one country club. With respect to the schools, Limestone initially applied a one-half multiplier to the applicable design basis. Because the Commission’s Final Order did not provide direction to apply such a reduction, the Phase 2 filing reflects elimination of the one-half multiplier and application of the full design basis. The remaining increase is attributable to updated information for a country club that maintains multiple accounts with Limestone, resulting in revised ERU calculations. Collectively, these three customers account for approximately 888 of the determinant increase.
- c. The increase of approximately 587 determinants for Lakeside Estates results from updated information regarding multiple vacation rental and short-term lodging properties. Limestone obtained updated guest capacity information indicating that certain properties can accommodate more occupants than originally reflected, which increased the associated ERUs. These updates are reflected in the Phase 2 attrition determinants and detailed in the **“Confidential Commercial ERU Data”** tab.
- d. Billing under the proposed Phase 2 rates is based on the Phase 2 attrition determinants, consistent with the Commission’s directive to utilize the latest available billing determinants for Phase 2 implementation.
- e. Limestone has not increased any commercial ERU assignments since the implementation of Phase 1. The proposed changes reflected in Exhibit AJS3 are the

result of updated determinant counts and revised facility information incorporated into the Phase 2 attrition determinants. Any proposed changes to ERU values are reflected for Phase 2 implementation purposes only and have not been applied to customer billing absent Commission direction.

- f. Confirmed. The proposed Phase 2 rates reflect increases of up to approximately 40 percent for certain residential customers (e.g., Cartwright – Arrington/Hardeman/Hideaway residential customers increasing from \$75 to \$105.08) and up to approximately 195 percent for certain commercial customers (e.g., Shiloh Falls commercial customers increasing from \$55.60 to \$163.92). These changes reflect the mechanical implementation of the remaining Commission approved revenue recovery using updated billing determinants and do not result from new rate design changes adopted by the Company.

**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:**

- a. New commercial customers are informed that their bills are calculated using the rates approved in the applicable tariff, which details the Company’s ERU methodology. The

tariff and approved rate schedules identify the applicable rates, and ERU assignments are based on standardized design criteria associated with the customer's facility type. Using this information, Limestone Water can provide bill estimates for new commercial customers in situations where sufficient design basis information is available.

- b. Commercial customers may determine whether their bill is accurate by reviewing the rates applied, the ERUs assigned to their account, and the resulting charges reflected on the bill. If a commercial customer questions the ERUs used to calculate the bill, Limestone Water reviews the assignment on an individual basis and evaluates whether the ERUs appropriately reflect the customer's facility type and available information, consistent with the approved methodology.
- c. The Phase 2 rate design provides clear and understandable price signals by transparently linking commercial bills to assigned ERUs and Commission approved rates set forth in the tariff. Because ERUs are assigned based on standardized design criteria tied to facility characteristics, commercial customers can understand how those characteristics influence their bills.

**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:** Limestone objects to this request as unduly burdensome, as it would require the use and expenditure of substantial resources. Subject to and without waiving this objection, and in the

spirit of good faith cooperation, Limestone has provided the attached **CONFIDENTIAL** spreadsheet, which includes: (1) the base amount billed by active commercial customer prior to Phase 1 implementation (May 2025), (2) the base amount billed after Phase 1 rates were implemented (June 2025), and (3) an estimated amount billed under the proposed Phase 2 rates.

**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:** The specific flow assumptions derived from this guidance and applied in the Phase 2 rate design are reflected in Petitioner’s Exhibits AJS3 and AJS4, which were filed with Mr. Silas’ testimony associated with the general rate case (Phase 1) and are reattached hereto as Attachments 1-7.1 and 1-7.2.

The full report can be found at

<https://www.tn.gov/content/dam/tn/environment/water/policy-and-guidance/dwr-npdes-sop-g-02-ww-design-criteria-chapter-2-072020.pdf>

**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:** The ERUs shown for each commercial customer on the Phase 1 spreadsheet were calculated using standardized design basis criteria. The materials attached to this response identify the applicable facility type for each commercial customer, the corresponding design basis, and the reference design basis table used to calculate the assigned ERUs. These sources formed the basis for the ERU values reflected in the Phase 1 rate design.

**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:** The monthly revenue figures reflected in Exhibit AJS1 and the Phase 2 spreadsheet are derived from the Company’s billing system and underlying billed revenue reports for the June 2025 through December 2025 period. The support attached to this response includes bill level extracts and summary schedules showing billed amounts by tariff element, which reconcile to the monthly values presented in the referenced spreadsheet.

**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.”

---

<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”).

- 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:** Please see the support attached to DR 1-9.

**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:** Please see the support attached to DR 1-9.

**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.”
- 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.

---

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

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

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

**RESPONSE:** The Commission’s Final Order directed Limestone to file the latest available monthly billing determinants in connection with Phase 2 implementation. Consistent with that directive, Limestone updated the billing determinants reflected in Column L using the most current information available at the time of filing.

**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:** Consistent with the Commission’s Phase 1 rate design, no portion of the approved rate increase was allocated to usage rates for Aqua Utilities. In Phase 1, the Commission did not modify the usage rate structure and instead implemented the approved revenue recovery through fixed charges. Limestone applied the same methodology in Phase 2 to mechanically implement the remaining revenue recovery without altering the usage rate design or reallocating costs among rate components.

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

---

<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:** The imputed Cartwright Creek commercial usage revenue reflected in Phase 1 was based on test year billing determinants and was adopted by the Commission as a normalization adjustment to reflect usage revenue that should have been billed during the test and attrition periods. Following Phase 1 implementation, commercial usage is no longer a billing determinant for Cartwright Creek, and Phase 1 actual revenues reflect the Commission approved rate design as implemented. As a result, the previously imputed usage revenue is inherently embedded in Phase 1 actuals and is not separately reflected or carried forward in the Phase 2 rate design. Phase 2 rates were designed to mechanically recover the remaining approved revenue deficiency using updated billing determinants without re-imputing test year usage revenues.

**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>

---

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

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

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:** Please see the support provided in response to DR 1-9. The billing determinant value of 768 for Shiloh Falls commercial customers reflects a manual adjustment made to account for an ERU reduction for a commercial customer, as identified in response to subpart (f) of DR 1-3. The adjustment was necessary because the ERU dispute was raised less than one month prior to the March 2, 2026, filing deadline, and therefore the underlying system-generated data used in the Phase 2 rate design did not yet reflect the revised ERU assignment.

**1-16. 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 Phase 2 revenue increase as shown in the table below.<sup>12</sup>

Service	Revenue Deficiency	Phase 1 Increase	Phase 1 Percent	Phase 2 Increase
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>

<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.

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.

Service	Revenue Deficiency	Less Phase 1 Increase	Phase 2 Increase
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 found appropriate by the Commission. Explain the Company’s rationale for departing from the allocated increase allowed by the Commission.

**RESPONSE:** The Commission did not authorize specific Phase 2 revenue increases by service. The Final Order approved recovery of the remaining revenue deficiency on a company-wide basis and expressly directed Limestone to file a proposed Phase 2 rate design for review, rather than prescribing service specific Phase 2 allocations. Consistent with the Order’s statement that recovery of the deficiency on a companywide basis was warranted “to lessen the impact on water rates,” Limestone allocated the remaining Phase 2 revenue requirement using the same percentage methodology applied in Phase 1. This approach maintains consistency with the Commission approved Phase 1 rate design and implements Phase 2 as a mechanical continuation of the Commission’s adopted methodology, rather than reallocating the remaining deficiency between water and sewer in a manner not expressly directed by the Commission.

**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>

Service	Phase 2 Increase	Cartwright Creek	Total Phase 2
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:** The imputed Cartwright Creek commercial revenues reflect a test period normalization adopted by the Commission to address historical underbilling and are embedded in the Commission approved revenue deficiency recovered on a companywide basis. In Phase 2, Limestone treated the imputed amount consistently with the overall Phase 2 revenue recovery by including it within the remaining companywide revenue requirement rather than isolating it to Cartwright Creek commercial customers. This approach reflects that Phase 2 is an implementation step to recover the remaining approved deficiency and associated carrying charges, not a re-segmentation of test year normalization adjustments by individual system or customer group.

---

<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:** The “Units (Design Basis)” values shown in Column G of the **CONFIDENTIAL** Commercial ERU Data tab are supported by the attached documentation.

**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:** The ERU values shown in Column K of the **CONFIDENTIAL Commercial ERU Data** tab are derived from the applicable design basis units and the commercial ERU reference table. Specifically, the design basis information supporting the underlying units is provided in response to DR 118, and those units are converted to ERUs using the commercial reference table provided in response to DR 12.

**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:** The “Current ERU” values shown in Column L reflect the ERUs assigned to each commercial customer as part of the Phase 1 implementation, as adjusted consistent with the Direct Testimony of Aaron Silas and the Company’s response to DR 1-3. These values represent the Company’s currently effective ERU assignments used as the baseline for the Phase 2 rate design.

**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:** Limestone is unaware of any defined use of the term “Commercial Customer Code” within its Phase 2 filing. Limestone believes this reference relates to the public version of the Phase 1 proposed rate design. In that context, the commercial customer codes were used solely as internal identifiers to anonymize and protect confidential commercial customer information in the public

filing. The codes were not used for ratemaking purposes and have no impact on the calculation of ERUs or rates.

Respectfully submitted,



---

Melvin Malone (BPR No. 013874)  
Butler Snow LLP  
Neuhoff Building  
1320 Adams Street, Suite 1400  
Nashville, TN 37208  
Phone: (615) 651-6700  
[Melvin.Malone@butlersnow.com](mailto:Melvin.Malone@butlersnow.com)

*Attorneys for Limestone Water Utility  
Operating Company, LLC*

Facility Type	Design Basis	Typical Flow (gallons per unit per day)	ERU Multiplier	Source
Residential		300	1.00	TN Design Criteria
Airport	Passenger	3	0.01	TN Design Criteria
Apartment House	Person	50	0.17	TN Design Criteria
Apartment, Resort	Person	60	0.20	TN Design Criteria
Assembly Hall	Seat	3	0.01	TN Design Criteria
Automobile Service Station	Employee	12	0.04	TN Design Criteria
Bar	Employee	13	0.04	TN Design Criteria
Barber Shop	Chair	50	0.17	NC Design Criteria
Boarding House	Person	40	0.13	TN Design Criteria
Bowling Alley	Alley	200	0.67	TN Design Criteria
Camps:			-	TN Design Criteria
Pioneer Type	Person	25	0.08	TN Design Criteria
Children's	Person	45	0.15	TN Design Criteria
Day, w meals	Person	15	0.05	TN Design Criteria
Day, w/o meals	Person	13	0.04	TN Design Criteria
Luxury, private bath	Person	90	0.30	TN Design Criteria
Trailer Camp	Person	125	0.42	TN Design Criteria
Campground-developed	Person	30	0.10	TN Design Criteria
Church	Seat	3	0.01	NC Design Criteria
Cocktail Lounge	Seat	20	0.07	TN Design Criteria
Coffee Shop	Employee	10	0.03	TN Design Criteria
Country Club	Guests	100	0.33	TN Design Criteria
Department Store	Toilet Room	500	1.67	TN Design Criteria
Dining Hall	Meal Served	7	0.02	TN Design Criteria
Dormitory/Bunkhouse	Person	40	0.13	TN Design Criteria
Fairground	Visitor	2	0.01	TN Design Criteria
Hospital Medical	Bed	165	0.55	TN Design Criteria
Hospital Mental	Bed	100	0.33	TN Design Criteria
Hotel	Guests	50	0.17	TN Design Criteria
Industrial Building	Employee	13	0.04	TN Design Criteria
Laundry	Machine	550	1.83	TN Design Criteria
Office	Employee	13	0.04	TN Design Criteria
Picnic Park	Visitor	2	0.01	TN Design Criteria
Prison	Inmate	120	0.40	TN Design Criteria
Public Lavatory	User	5	0.02	TN Design Criteria
Rest Home	Resident	90	0.30	TN Design Criteria
Restaurant			-	TN Design Criteria
Conventional	Customer	9	0.03	TN Design Criteria
Short Order	Customer	6	0.02	TN Design Criteria
Bar	Customer	3	0.01	TN Design Criteria
School			-	TN Design Criteria
w cafeteria, gym showers	Student	25	0.08	TN Design Criteria
w cafeteria only	Student	15	0.05	TN Design Criteria
w/o all	Student	11	0.04	TN Design Criteria
School Boarding	Student	75	0.25	TN Design Criteria
Shopping Center	Employee	10	0.03	TN Design Criteria
Store, resort	Employee	10	0.03	TN Design Criteria
Swimming Pool	Employee	10	0.03	TN Design Criteria
Theater	Seat	3	0.01	TN Design Criteria
Visitor Center	Visitor	5	0.02	TN Design Criteria
Warehouse	Loading Bay	100	0.33	NC Design Criteria

**ATTACHMENTS TO DISCOVERY REQUEST 1-3**

**[CONFIDENTIAL]**

**ATTACHMENT TO DISCOVERY REQUEST 1-6**

**[CONFIDENTIAL]**



**DWR-NPDES-SOP-G-02-WW Design Criteria Chapter 2-072020**  
**Design Criteria for Review of Sewage Works Construction Plans and Documents**  
**Chapter 2**

**APPENDIX 2-A**

**DESIGN BASIS FOR WASTEWATER FLOW AND LOADING**

**Typical Wastewater Flow Rates from Commercial and Industrial Sources**

(Source: Crites and Tchobanoglous, 1998)

FACILITY	UNIT	Flow, gallons/unit/day	
		Range	Typical
Airport	Passenger	2-4	3
Apartment House	Person	40-80	50
Apartment, resort	Person	50-70	60
Assembly Hall	Seat	2-4	3
Automobile Service Station	Vehicle Served	8-15	12
	Employee	9-15	13
Bar	Customer	1-5	3
	Employee	10-16	13
Boarding House	Person	25-60	40
Bowling Alley	Alley	150-250	200
Camps:			
Pioneer Type	Person	15-30	25
Children's with central toilet/bath	Person	35-50	45
Day, with meals	Person	10-20	15
Day, without meals	Person	10-15	13
Luxury, private bath	Person	75-100	90
Trailer Camp	Person	75-125	125
Campground-developed	Person	20-40	30
Cocktail Lounge	Seat	12-25	20
Coffee Shop	Customer	4-8	6
	Employee	8-12	10
Country Club	Guests on-site	60-130	100
	Employee	10-15	13
Department Store	Toilet Room	400-600	500
	Employee	8-15	10
Dining Hall	Meal Served	4-10	7
Dormitory/bunkhouse	Person	20-50	40
Fairground	Visitor	1-2	2
Hospital, Medical	Bed	125-240	165
	Employee	5-15	10
Hospital, Mental	Bed	75-140	100
	Employee	5-15	10
Hotel	Guest	40-60	50
	Employee	8-13	10
Industrial Building (sanitary waste only)	Employee	7-16	13



**DWR-NPDES-SOP-G-02-WW Design Criteria Chapter 2-072020**  
**Design Criteria for Review of Sewage Works Construction Plans and Documents**  
**Chapter 2**

Laundry (self-service)	Machine	450-650	550
	Wash	45-55	50
Office	Employee	7-16	13
Picnic Park, flush toilets	Visitor	1-2	2
Prison	Inmate	80-150	120
	Employee	5-15	10
Public Lavatory	User	3-6	5
Rest Home	Resident	50-120	90
	Employee	5-15	10
Restaurant (with toilet)	Meal	2-4	3
	Conventional Customer	8-10	9
	Short Order Customer	3-8	6
	Bar/ cocktail lounge Customer	2-4	3
School, day only			
With cafeteria, gym, showers	Student	15-30	25
With cafeteria only	Student	10-20	15
Without cafeteria, gym or showers	Student	5-17	11
School boarding	Student	50-100	75
Shopping Center	Employee	7-13	10
	Parking Space	1-3	2
Store, resort	Customer	1-4	3
	Employee	8-12	10
Swimming Pool	Customer	5-12	10
	Employee	8-12	10
Theater	Seat	2-4	3
Visitor Center	Visitor	4-8	5

The flow for a residential house is typically 300 gallons/unit/day.

**15A NCAC 02T .0114 WASTEWATER DESIGN FLOW RATES**

(a) This Rule shall be used to determine wastewater flow rates for all systems governed by this Subchapter unless alternate criteria are provided by a program-specific rule or for flow used for the purposes of 15A NCAC 02H .0105. Higher flow rates shall be required where usage and occupancy are atypical, including those in Paragraph (e) of this Rule. Wastewater flow calculations shall take hours of operation and anticipated maximum occupancies and usage into account when calculating peak flows for design.

(b) In determining the volume of sewage from dwelling units, the flow rate shall be 120 gallons per day per bedroom. The minimum volume of sewage from each dwelling unit shall be 240 gallons per day and each additional bedroom above two bedrooms shall increase the volume by 120 gallons per day. Each bedroom or any other room or addition that can function as a bedroom shall be considered a bedroom for design purposes. When the occupancy of a dwelling unit exceeds two persons per bedroom, the volume of sewage shall be determined by the maximum occupancy at a rate of 60 gallons per person per day.

(c) The following table shall be used to determine the minimum allowable design daily flow of wastewater facilities. Design flow rates for establishments not identified below shall be determined using available flow data, water-using fixtures, occupancy or operation patterns, and other measured data.

Type of Establishments	Daily Flow For Design
Barber and beauty shops	
Barber Shops	50 gal/chair
Beauty Shops	125 gal/booth or bowl
Businesses, offices and factories	
General business and office facilities	25 gal/employee/shift
Factories, excluding industrial waste	25 gal/employee/shift
Factories or businesses with showers or food preparation	35 gal/employee/shift
Warehouse	100 gal/loading bay
Warehouse – self storage (not including caretaker residence)	1 gal/unit
Churches	
Churches without kitchens, day care or camps	3 gal/seat
Churches with kitchen	5 gal/seat
Churches providing day care or camps	25 gal/person (child & employee)
Fire, rescue and emergency response facilities	
Fire or rescue stations without on site staff	25 gal/person
Fire or rescue stations with on-site staff	50 gal/person/shift
Food and drink facilities	
Banquet, dining hall	30 gal/seat
Bars, cocktail lounges	20 gal/seat
Caterers	50 gal/100 sq ft floor space
Restaurant, full Service	40 gal/seat
Restaurant, single service articles	20 gal/seat
Restaurant, drive-in	50 gal/car space
Restaurant, carry out only	50 gal/100 sq ft floor space
Institutions, dining halls	5 gal/meal
Deli	40 gal/100 sq ft floor space
Bakery	10 gal/100 sq ft floor space
Meat department, butcher shop or fish market	75 gal/100 sq ft floor space
Specialty food stand or kiosk	50 gal/100 sq ft floor space
Hotels and Motels	
Hotels, motels and bed & breakfast facilities, without in-room cooking facilities	120 gal/room
Hotels and motels, with in-room cooking facilities	175 gal/room
Resort hotels	200 gal/room
Cottages, cabins	200 gal/unit
Self service laundry facilities	500 gal/machine
Medical, dental, veterinary facilities	
Medical or dental offices	250 gal/practitioner/shift
Veterinary offices (not including boarding)	250 gal/practitioner/shift

**Petitioner’s Exhibit AJS-4: North Carolina Guide for Assigning Equivalent Residential Units**

Veterinary hospitals, kennels, animal boarding facilities	20 gal/pen, cage, kennel or stall
Hospitals, medical	300 gal/bed
Hospitals, mental	150 gal/bed
Convalescent, nursing, rest homes without laundry facilities	60 gal/bed
Convalescent, nursing, rest homes with laundry facilities	120 gal/bed
Residential care facilities	60 gal/person
Parks, recreation, camp grounds, R-V parks and other outdoor activity facilities	
Campgrounds with comfort station, without water or sewer hookups	75 gal/campsite
Campgrounds with water and sewer hookups	100 gal/campsite
Campground dump station facility	50 gal/space
Construction, hunting or work camps with flush toilets	60 gal/person
Construction, hunting or work camps with chemical or portable toilets	40 gal/person
Parks with restroom facilities	250 gal/plumbing fixture
Summer camps without food preparation or laundry facilities	30 gal/person
Summer camps with food preparation and laundry facilities	60 gal/person
Swimming pools, bathhouses and spas	10 gal/person
Public access restrooms	325 gal/plumbing fixture
Schools, preschools and day care	
Day care and preschool facilities	25 gal/person (child & employee)
Schools with cafeteria, gym and showers	15 gal/student
Schools with cafeteria	12 gal/student
Schools without cafeteria, gym or showers	10 gal/student
Boarding schools	60 gal/person (student & employee)
Service stations, car wash facilities	
Service stations, gas stations	250 gal/plumbing fixture
Car wash facilities	1200 gal/bay
Sports centers	
Bowling center	50 gal/lane
Fitness, exercise, karate or dance center	50 gal/100 sq ft
Tennis, racquet ball	50 gal/court
Gymnasium	50 gal/100 sq ft
Golf course with only minimal food service	250 gal/plumbing fixture
Country clubs	60 gal/member or patron
Mini golf, putt-putt	250 gal/plumbing fixture
Go-kart, motocross	250 gal/plumbing fixture
Batting cages, driving ranges	250 gal/plumbing fixture
Marinas without bathhouse	10 gal/slip
Marinas with bathhouse	30 gal/slip
Video game arcades, pool halls	250 gal/plumbing fixture
Stadiums, auditoriums, theaters, community centers	5 gal/seat
Stores, shopping centers, malls and flea markets	
Auto, boat, recreational vehicle dealerships/showrooms with restrooms	125 gal/plumbing fixture
Convenience stores, with food preparation	60 gal/100 sq ft
Convenience stores, without food preparation	250 gal/plumbing fixture
Flea markets	30 gal/stall
Shopping centers and malls with food service	130 gal/1000 sq ft
Stores and shopping centers without food service	100 gal/1000 sq ft
Transportation terminals – air, bus, train, ferry, port and dock	5 gal/passenger

(d) Design daily flow rates for proposed non-residential developments where the types of use and occupancy are not known shall be designed for a minimum of 880 gallons per acre, or the applicant shall specify an anticipated flow based upon anticipated or potential uses.

**Petitioner's Exhibit AJS-4: North Carolina Guide for Assigning Equivalent Residential Units**

(e) Design daily flow rates for residential property on barrier islands and similar communities located south or east of the Atlantic Intracoastal Waterway and used as vacation rental as defined in G.S. 42A-4 shall be 120 gallons per day per habitable room. Habitable room shall mean a room or enclosed floor space used or intended to be used for living or sleeping, excluding kitchens and dining areas, bathrooms, shower rooms, water closet compartments, laundries, pantries, foyers, connecting corridors, closets, and storage spaces.

(f) An adjusted daily sewage flow design rate shall be granted for permitted but not yet tributary connections and future connections tributary to the system upon showing that the capacity of a sewage system is adequate to meet actual daily wastewater flows from a facility included in Paragraph (b) or (c) of this Rule without causing flow violations at the receiving wastewater treatment plant or capacity-related sanitary sewer overflows within the collection system as follows:

- (1) Documented, representative data from that facility or a comparable facility shall be submitted by an authorized signing official in accordance with Rule .0106 of this Section to the Division for all flow reduction requests, as follows:
  - (A) dates of flow meter calibrations during the time frame evaluated and indication if any adjustments were necessary;
  - (B) a breakdown of the type of connections (e.g. two bedroom units, three bedroom units) and number of customers for each month of submitted data as applicable. Identification of any non-residential connections including subdivision clubhouses and pools, restaurants, schools, churches and businesses. For each non-residential connection, information identified in Paragraph (c) of this Rule (e.g. 200 seat church, 40 seat restaurant, 35 person pool bathhouse);
  - (C) a letter of agreement from the owner or an official, meeting the criteria of Rule .0106 of this Section, of the receiving collection system or treatment works accepting the wastewater and agreeing with the adjusted design rate;
  - (D) age of the collection system;
  - (E) analysis of inflow and infiltration within the collection system or receiving treatment plant, as applicable;
  - (F) if a dedicated wastewater treatment plant serves the specific area and is representative of the residential wastewater usage, at least the 12 most recent consecutive monthly average wastewater flow readings and the daily total wastewater flow readings for the highest average wastewater flow month per customers, as reported to the Division;
  - (G) if daily data from a wastewater treatment plant cannot be used or is not representative of the project area: 12 months worth of monthly average wastewater flows from the receiving treatment plant shall be evaluated to determine the peak sewage month. Daily wastewater flows shall then be taken from a flow meter installed at the most downstream point of the collection area for the peak month selected that is representative of the project area. Justification for the selected placement of the flow meter shall also be provided; and
  - (H) an estimated design daily sewage flow rate shall be determined by calculating the numerical average of the top three daily readings for the highest average flow month. The calculations shall also account for seasonal variations, excessive inflow and infiltration, age and suspected meter reading and recording errors.
- (2) The Division shall evaluate all data submitted but shall also consider other factors in granting, with or without adjustment, or denying a flow reduction request including: applicable weather conditions during the data period (i.e. rainy or drought), other historical monitoring data for the particular facility or other similar facilities available to the Division, the general accuracy of monitoring reports and flow meter readings, and facility usage, such as whether the facility is in a resort area.
- (3) Flow increases shall be required if the calculations required by Subparagraph (f)(1) of this Rule yield design flows higher than that specified in Paragraphs (b) or (c) of this Rule.
- (4) The permittee shall retain the letter of any approved adjusted daily design flow rate for the life of the facility and shall transfer such letter to a future permittee.

*History Note: Authority G.S. 143-215.1; 143-215.3(a)(1);  
Eff. September 1, 2006;  
Readopted Eff. September 1, 2018.*

**ATTACHMENT TO DISCOVERY REQUEST 1-8**

**[CONFIDENTIAL]**

**ATTACHMENT TO DISCOVERY REQUEST 1-9**

**[CONFIDENTIAL]**

**ATTACHMENT TO DISCOVERY REQUEST 1-18**

**[CONFIDENTIAL]**

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

---

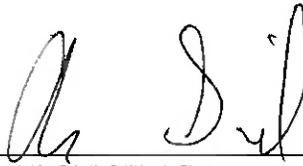
VERIFICATION

---

STATE OF MO )

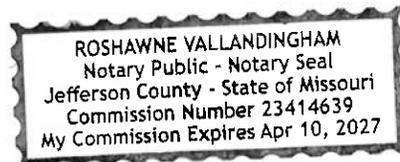
COUNTY OF St. Louis )

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, verifies that the data requests and discovery responses are accurate to the best of my knowledge.

  
\_\_\_\_\_  
AARON SILAS

Sworn to and subscribed before me  
this 17<sup>th</sup> day of March, 2026.

  
Notary Public



My Commission expires: 04-10-2027

CERTIFICATE OF SERVICE

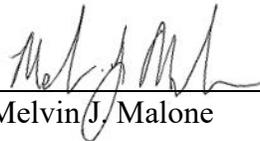
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Karen H. Stachowski, Esq.  
Deputy Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Karen.Stachowski@ag.tn.gov](mailto:Karen.Stachowski@ag.tn.gov)

Vance L. Broemel, Esq.  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Karen.Stachowski@ag.tn.gov](mailto:Karen.Stachowski@ag.tn.gov)

Shilina B. Brown, Esq.  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Shilina.Brown@ag.tn.gov](mailto:Shilina.Brown@ag.tn.gov)

This the 18<sup>th</sup> day of March 2026.

  
\_\_\_\_\_  
Melvin J. Malone