

STATE OF TENNESSEE

Office of the Attorney General



JONATHAN SKRMETTI
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

March 26, 2026

Chairman David Jones
c/o Ms. Tory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37242-0001

Electronically Filed in TPUC Docket
Room on March 26, 2026 at 1:13 p.m.

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

Dear Chairman Jones:

Enclosed for filing, please find the Affidavit of Glynn Taylor.

By copy of this letter, we are notifying:
Melvin Malone, Esq,
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201

Russ Mitten, Esq,
David Woodsmall, Esq.
General Counsel – Central States Water Resources
CSWR, LLC
1630 Des Peres Road, Suite 140
St. Louis, MO, 63131

Sincerely,

A handwritten signature in cursive script that reads "Vance L. Broemel".

Vance Broemel
Senior Assistant Attorney General

cc: Rosalie Gunger

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

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

AFFIDAVIT OF GLYNN TAYLOR

AFFIDAVIT OF GLYNN TAYLOR

The accompanying affidavit of Glynn Taylor will be introduced as evidence at the hearing in TPUC Docket 24-00044. Glynn Taylor will not be called to testify orally and you will not be entitled to question such affiant unless you notify Glynn Taylor at Old Natchez Country Club, LLC, 115 Gardengate Drive, Franklin, TN 37069 that you wish to cross-examine such affiant. To be effective, your request must be mailed or delivered to Old Natchez Country Club, LLC, 115 Gardengate Drive, Franklin, TN 37069 on or before April 2nd, 2026, or seven (7) days after the date of mailing or delivering the affidavit to Limestone Water Utility Operating Company, LLC and Mr. Melvin Malone, Esq. pursuant to Tenn. Code Ann. §4-5-313.

I, Glynn Taylor, hereby state that I have personal knowledge of the facts set forth below, and the facts contained herein are true to the best of my recollection. If called as a witness, I would testify as follows:

1. My name is Glynn Taylor. I am over the age of 21 and of sound mind. All matters set out herein are based on my personal knowledge except where indicated on information or belief.
2. I have held the position of President and an owner of Old Natchez Country Club, LLC since November 2008.
3. Old Natchez Country Club has been a consumer of Cartwright Creek, LLC. (“Cartwright Creek”) since July 1995.
4. In December 2021, we received the final monthly charge for sewer service in the amount of \$608.19.

5. Limestone Water Utility Operating Company, LLC (“Limestone”) acquired Cartwright Creek and its Certificate of Public Convenience and Necessity (“CCN”) on January 24th, 2022.
6. In early February 2022, we received our first monthly charge from Limestone in the amount of \$37.00. This was the monthly charge for wastewater service through April 2025.
7. In early June 2025, we received a new billing from Limestone dated June 3, 2025, with a monthly charge for May 2025 wastewater service of \$14,204, which was supposedly pursuant to the commission’s approval of Limestone’s Petition and its Phase 1 Rate Design in Docket No. 24-00044.
8. Very shortly after receiving the billing dated June 3, 2025, I contacted Limestone through their customer service phone number to inquire about the increase in our monthly charge from \$37 to \$14,204.
9. This was the start of several phone conversations I had with Limestone representatives who provided feedback that ranged from initially not being able to explain the increase at all, to eventually explaining that our monthly charge was a result of a new rate of \$168.96 being multiplied by 83 ERUs which Limestone had assigned to our facility based on their estimates that we had an average daily count of 497 people each producing 50 gallons of wastewater, and that all of this had been approved by the Tennessee Public Utility Commission.
10. These phone conversations occurred over approximately two weeks and because my initial conversations were so non-productive, I filed a billing complaint with TPUC on June 12, 2025.

11. Around this time, I also became aware of the TPUC Docket Room and the documents relating to Limestone's rate case.
12. I am summarizing the feedback I received from Limestone in these initial phone conversations as mostly restating to me that our new charge, inclusive of our being assigned 83 ERUs was final, because it had been approved by TPUC.
13. Despite my communicating at multiple points that there was no way we had the amount of wastewater flow sufficient to support 83 ERUs and even offered to provide our sanitary meter flows to prove that point. I also was never advised that I could request to have our charge or the assignment of ERUs underlying our charge reviewed.
14. Around June 24, 2025, I found in the docket file 24-00044, Melvin Malone's cover letter for Limestone's May 19, 2025, filing of Limestone's Revised Rate Design and UOC Tarriff, that included a direct reference to Limestone's obligation to receive commercial customer's requests to have their assigned ERU's evaluated.
15. On June 24, 2025, I emailed Melvin Malone inquiring as to the protocol for having our ERU's reviewed.
16. Around that same date, I had a phone conversation with a Limestone representative who I had previously spoken with and asked him why despite my persistent questions about our ERU assignment I had only been advised that it was approved by TPUC and had not been advised that we could request a review of our ERUs. His reply was that I had not specifically asked for a review.
17. Finally on July 2, 2025 I received an email from Tricia Lindley, the Call Center Manager for CSWR Group, indicating that she was reaching out regarding our concerns about our current invoice, and that part of the billing calculation was based on the

number of members and staff at the country club and that if we could provide that information it would be reviewed against Limestone's records and if any adjustments were warranted they would be made.¹ Her email made no reference of how ERUs were calculated, how many members and staff Limestone already presumed we had on site per day, and no indication as to how I should calculate the number of members and staff we believed we had on site per day.

18. I did not provide Limestone with any estimates of our members or staff on site per day because we did not have a facility-wide protocol for registering people and because I knew that estimating our wastewater flow based on estimated attendance could never be as accurate as estimating our wastewater flow based on our metered sanitary water flow.

19. After several emails with Tricia Lindley in which I tried to understand more details of the methodology and approval process for commercial customers charges, she advised via email on July 16, 2025, that the billing rate currently being applied to Old Natchez Country Club was correct as rendered and reflected the Commission-approved rate design. When I asked via reply email for the specific page of the tariff at which I could find a commercial rate design, she directed me via email on July 17, 2025, to page 10 of the May 19, 2025 filing².

20. The page she referenced indicated that the commercial rate for Cartwright Creek was \$168.96 per equivalent residential unit *. In turn, the footnote tied to the asterisk could be found on page 12 with an explanation that ERUs had been assigned to each

¹ Email correspondence between Limestone members and myself attached as Exhibit A.

² *Limestone Water Utility Operating Company LLC Revised Rate Design and UOC Tariff*, TPUC Docket No. 24-00044 (November 26, 2024).

commercial customer utilizing typical wastewater flow rates derived from the TDEC plans review and approval of sewage works construction plans and documents, which I knew was not an accurate statement because I had found the document in the docket and the flow data from it was a broad estimate per person, seat, etc. and was useless until it was paired with an estimate of how many persons, seats, etc. were at a specific facility. In this same email she indicated that any further questions about the commercial rate design should be directed to Aaron Silas, the Assistant VP, Customer Experience & Regulatory Operations.

21. By this point, I had learned a great deal about the rate increase, but still could not believe that TPUC had knowingly approved an increase in our monthly charge from \$37 to \$14,024 and also had many questions regarding how Limestone had arrived at their estimated persons per day at our facility which was driving our assignment of 83 ERUs.
22. On July 25, 2025, I first emailed Aaron Silas with questions including if Limestone had advised TPUC that the increase to our company alone would account for 69% of the total increase approved for all commercial customers, and if Limestone had advised TPUC that their described methodology of utilizing flow data from the TDEC table was not fully accurate because it did not include the fact that an additional headcount variable had to be determined and used.
23. By July 29, 2025, I had received no reply from him, so I emailed him again asking for confirmation that he had received my email.
24. Later, on July 29, 2025, Aaron Silas replied to my email with feedback on my questions including that the commercial rate design consisted of two components, the rate

schedule on page 1 of the May 19, 2025, filing and the footnote I previously mentioned referencing the utilization of flow data from the TDEC table. He expanded on this by stating that there was no additional variable for the flow data while in the same space indicating that Limestone had estimated that we had 250 daily persons producing 100 gallons per day of wastewater, figures that were completely different than the 497 persons producing 50 gallons per day that I had first been told, and referring to the head count as a discretionary variable while listing the calculation as $(\text{Flow from TDEC table}) \div 300 = \text{ERUs} \times \$168.96 = \text{Monthly Rate}$.

25. I quickly replied to Aaron Silas's email strenuously disagreeing with his assertions and pointing out that Limestone had changed their data for Old Natchez from 497 persons at 50 gallons to 250 persons at 100 gallons.
26. I also specifically indicated that the head count was in fact a third variable because it was not included in the TDEC table, it was not included in the tariff schedule, a facilities wastewater flow could not be calculated without it, and that Limestone had set it at its own discretion.
27. I also reiterated that I had consistently informed Limestone that I had metered sanitary water flow which made the use of their theoretical estimates, which were wildly inaccurate, unnecessary.
28. Aaron Silas finished our emails for July 29, 2025, by replying that the ERU methodology was approved by TPUC and offered to receive estimates of headcounts from us that Limestone could consider possibly adjusting our assigned ERUs.
29. I resumed email correspondence with Aaron Silas on August 4, 2025 with an initial focus on trying to get information on the monthly charges of all commercial customers

because I still believed that TPUC likely did not fully realize the discretion Limestone had in setting ERUs and how that discretion had been applied to Old Natchez and that if I could demonstrate how extremely disproportionate our charge was compared to other customers that our charge would be modified.

30. By August 11, 2025, Aaron Silas had emailed me that a list of commercial customers and their charges could not be provided because it was confidential. I asked if it could be provided with the names of customers redacted, and he still declined.

31. Because I could not get information necessary to understand our monthly charge versus other commercial customers, I began to try to focus on other problematic aspects of the rate design specifically, the Public Notice requirements, and what methodology Limestone had used to establish headcounts at Old Natchez.

32. I was interested in the public notice requirements because I had come to understand that there was no way I or any other commercial customer could have known what our monthly charge was going to be from any of the materials that were included in the public notices.

33. I was interested in the methodology Limestone used to set our headcount because this was the driver of our outrageously inaccurate flow estimate. Limestone had indicated initially that it was based on 497 persons at 50 gallons and later revised it to 250 persons at 100 gallons, both of which totaled approximately 25,000 gallons per day.

34. By this time, I had also discovered Exhibit DR 2-18 ERU-Summary from the November 26, 2024 docket room entry³. This exhibit was a list of all commercial customers with the ERUs Limestone had assigned them. I was astounded that several

³ *Limestone Response to Consumer Advocate Discovery Request No. 2-18*, TPUC Docket No. 24-00044 (November 26, 2024).

entries in Cartwright Creek had only a single ERU. I know these were significant understatements of their ERUs based on my personal familiarity with the facilities.

35. My hope was that if I could demonstrate either or by both that the public notices or Limestone's headcount methodology was flawed, we would have a good case that our charge should be recalculated based on our sanitary water flow, which we had always indicated would be most accurate.

36. On August 19, 2025, Aaron Silas confirmed to me via email that the public notices regarding the rate increase never included information from which I could have identified the new monthly rate for Old Natchez.

37. Also on August 19, 2025, I emailed Aaron Silas with questions seeking an explanation of what methodology Limestone had used to estimate our headcounts, how the methodology used for Old Natchez was compared to the methodology used for other commercial customers and whether the methodology used by Limestone for Old Natchez headcounts had been provided to TPUC.

38. On August 20, 2025, Aaron Silas emailed a reply indicating that the methodology Limestone had utilized to establish the headcount for Old Natchez was to review publicly available information and based on that, estimate total guest count and then average daily attendance. He specifically included a list of amenities such as golf course, tennis courts, swimming pool etc. He also indicated that Limestone used this same methodology for other facilities, and that Limestone had not provided any details of their methodology for determining headcounts to TPUC because TPUC had not requested any details.

39. I immediately recognized that Limestone's methodology had consisted of visiting the first page of the Old Natchez website, noting the facilities listed there and using this as a "fig leaf" to establish a headcount that would equal 25,000 gallons per day based on a presumed flow from the TDEC table, first based on 50 gallons per person at 497, and later based on 100 gallons per person at 250.
40. After having confirmed that no objective methodology had been used to estimate headcounts at Old Natchez, I strongly suspected that in the instances where customers had ERUs of 1, Limestone likely applied no methodology at all.
41. At this point it very much was beginning to feel that Old Natchez had been singled out among Cartwright Creek customers and possibly among all customers to shoulder a disproportionate share of the rate increase approved for commercial customers.
42. Based on my significant concerns about the overall rate design, Limestone's intransigence toward using metered sanitary flows and their lack of transparency into the headcount methodology I prepared a follow-up email to Aaron Silas and began looking for an attorney who could help with the preparation and filing of a formal complaint with TPUC. In speaking with a private attorney, I learned that it would likely cost \$15,000 to \$20,000 to hire an attorney to simply restore us to fair treatment under the tariff even with a compelling case to present.
43. On August 27, 2025, I emailed Aaron Silas questions including whether the list of commercial customers submitted on November 26, 2024, was still accurate, whether this list was the only information TPUC received regarding the calculation of ERUs and whether Limestone's research supporting Old Natchez's ERU calculation consisted of anything other than visiting our website.

44. On August 28, 2025, Aaron Silas replied to my email indicating that the list of commercial customers was still accurate, that the ERU methodology had been expanded upon in Limestone's direct testimony and that Limestone had used all publicly available information in establishing headcounts and that sometimes that consisted solely of visiting a website, which I concluded meant that for Old Natchez a website visit was the sole research.
45. I replied to this email from Aaron Silas challenging his assertion that the ERU methodology had been expanded upon in regard to the headcount variable or a methodology for calculating headcounts. I cited that his direct testimony from July 16th, 2024, did not include any information on headcounts and inquired if he could direct me elsewhere in the record to any information that had been provided TPUC regarding headcounts.
46. Nine days later on September 8, 2025, he replied to my email that his direct testimony from July 16th, 2024, was the extent of what was provided TPUC regarding ERU determination, thereby confirming that the central importance of headcounts in determining ERUs, or that Limestone's cursory level methodology for determining headcounts was never communicated to TPUC.
47. At this point, I concluded that the monthly charges of a majority, if not all, commercial customers were compromised, the commercial rate design was of little practical use as implemented, and Limestone's credibility and capability to implement the ERU approach in general was seriously in question.
48. On September 9, 2025, I emailed Aaron Silas that I believed we were at the point that a phone call would be productive and we conducted a phone call that day. In that

conversation I made the case that Limestone's assignment of ERUs across commercial customers likely contained many errors in addition to the egregious one Old Natchez had been subjected to and that the only and best method for determining our ERUs was to utilize our metered sanitary wastewater flows.

49. After he again insisted that we needed to submit daily attendance estimates and records, I made a final point that it had to be the case that dividing our metered sanitary water flows by the 300 gallons per residential unit would produce our headcount because if it didn't, then the flow rate from the TDEC table was also inaccurate.
50. Later on September 9, 2025, I emailed Aaron Silas the 12 months of metered sanitary flows corresponding to the rate case test period and a calculation of what our headcount, ERUs and monthly charge should be based on utilizing metered flows.
51. In the same email, I also indicated that we believed the Consumer Advocate Division would support the filing of a formal complaint based on the following: that the ERUs assigned Old Natchez were inaccurate by a magnitude of 6 and had been based on Limestone's arbitrary guest count determination, that the ERUs assigned other facilities reflected inaccuracies like the one at Old Natchez causing the veracity and practical usefulness of the entire rate design to be in question, and that TPUC was likely unaware of the amount of the error and the faulty methodology Limestone used to establish headcounts because Limestone had never provided TPUC details of the central role of establishing headcounts in assigning ERUs or how Limestone planned to establish them.
52. On September 12, 2025, Aaron Silas emailed me to advise that Limestone would adjust our ERU and monthly charge utilizing our metered sanitary flows.

53. From September 12, 2025, to October 2, 2025, I exchanged emails with Aaron Silas regarding which 12 months of metered data should be utilized and to clarify which meters were to be utilized. With some reluctance, we agreed to use the most recent 12 months rather than the test period.
54. On October 8, 2025, I emailed Aaron Silas to follow-up on the status of our ERU adjustment and he replied that he needed to confirm the information we had provided.
55. Finally on October 21, 2025, approximately four and a half months after our first contact with Limestone regarding our monthly charge, Aaron Silas emailed me to confirm that our ERUs had been adjusted to 20 and our monthly charge would be \$3,379.20, and that credits would be issued to our account to make the adjusted monthly charge retroactive to May 1, 2025.
56. While I was ultimately relieved that the outcome of the process was a significant reduction of our monthly charge, the experience also left me resentful of the time and effort I had to expend to achieve the outcome and I became very skeptical of Limestone's actions and deeply concerned about what might lie ahead in Phase 2.

The above is true and accurate to the best of my knowledge.

Further affiant saith not.



GLYNN TAYLOR

State of Tennessee

County of Williamson

This instrument was signed before me, Jadon Christopher Dithrich, on this the 24th day of
(Printed Name of Notary)

March, 2026.



Notary

My commission expires: 02/02/2030



Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, September 8, 2025 9:56 AM
To: Glynn Taylor
Cc: Carlos Black
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Mr. Taylor,

I apologize for the delay in my response.

- The information in my testimony/DR responses is the extent of what was provided.
- The total increase was spread out evenly across the Equivalent Residential Units (ERUs). For ease, I look at it as an approval of the total revenue requirement (\$421,712 for CC commercial) and then a division by the total number of ERUs associated with that revenue requirement.
- There have been no additional commercial customers added in the CC areas to my knowledge and so my understanding is that Limestone has not gotten any additional revenues over what has been approved by the Commission. Please note that with ratemaking with historical information, its not uncommon for additional customers to be added post Commission approval. At the same time, its not uncommon for expenses to go up as well.

As always, if you have any additional information regarding your daily/monthly guest count, I would be happy to review your assigned ERUs. Additionally, while the rate design is not based on water usage, if you have 1 years worth of water usage, I'd be happy to review that as well.

Thanks!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Thursday, August 28, 2025 5:16 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #10

Mr. Silas –

To keep correspondence together see m follow up questions below in red.

Best Regards,
Glynn

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, August 28, 2025 8:25 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Mr. Taylor,

Thank you for consolidating your questions!

1. There were small tweaks made for 1-2 commercial customers, but it is largely the same as what was utilized in the final rate design.

2. The ERU methodology was further explained in Limestone's direct testimony with the initial filing.

After reviewing your 7/16/24 testimony as published in the Docket Room I see reference to the TN & NC flow rate tables used in assigning ERUs, but do not see any reference or explanation specific to the determination of the "count" variable that the flow rate has to be multiplied by. This appears consistent with your prior comment that this methodology was nor provided to TUPC because it was not requested. If an explanation of how the "count" variable was determined is in the record please direct me toward it.

3. Limestone utilized all publicly available information. In some cases, that consisted of solely the website. In other cases there was more information available.

4. The data from the Tennessee exhibit was utilized as much as possible as Limestone operates in Tennessee.

5. As I previously mentioned, the \$132,000 increase utilized a base year revenue that was significantly higher than what was actually charged. So the revenue increase number looks slightly skewed because Limestone has been charging the minimum charge since acquisition. As such, while it looks like the revenue increase number was \$132,000, the rates reflect a larger increase to account for base year revenues as well.

Are you indicating that the actual amount of increase was \$132,454 plus the \$91,230 that is referenced in the Rate Design as Imputed Cartwright Creek Commercial? if so, how was the \$91,230 allocated across commercial customers? Please comment on the fact that the \$168,000 increase borne by Old Natchez could account for 100% of the \$132,454 increase and \$36,000/\$91,230 -39% of the Imputed Commercial – meaning that the total contribution toward the increase of all other Cartwright Commercial Customers was only \$55,684?

Total Increase = \$91,230 + \$132,454 = \$223,684; less Old Natchez Increase = \$168,000 = \$55,684 = amount of increase borne by all other commercial customers

6. Limestone did not utilize an attrition year and therefore projected customer counts were not utilized. Utilizing historical test years require the connection count to also be historical. While there are projections of attrition year revenues for the sake of rate design, the actual data utilized is historical.

Can you confirm that if actual customer counts have increased in the period between the end of the test year at 4/30/24 and the implementation of the new rate design at 5/1/25, then the new rate design must yield more revenue than is indicated in the Attrition Year?

7. Limestone utilized historical information for the base year so those numbers are actuals. Please see my response to question 6 above.

Thank you!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Wednesday, August 27, 2025 5:12 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #10

Mr. Silas –

Appreciate your request to consolidate questions – can't say these will be my last – but for the moment trying to round out our understanding of the commercial rate design and how it was applied to Old Natchez.

1. Exhibit "DR 2-18 Summary" from your testimony on 11/26/24 appears to be a full list of commercial customers that is subject to the commercial rate design including their assigned ERUs. I do not see this exhibit in any later filings – is this the final version of this list that was used in the Rate Design?
2. You have indicated that Limestone did not provide its methodology for determining ERUs to TPUC because "it was not requested". Can you confirm therefore that the only information TPUC received regarding the calculation of ERUs was Exhibit "DR 2-18 Summary"?
3. You have indicated that Limestone utilized publicly available information to establish an estimate for the number of guests for Old Natchez and other types of establishments. In the case of Old Natchez it very much appears that Limestone visited the home page of our website (see below) to gather its information. Can you

advise if there was any fact gathering other than visiting our website, and whether this was the same methodology utilized for the other commercial customers listed in “DR 2-18 Summary”

Copy from ONCC website which almost identically matches the info you provided

Old Natchez members enjoy a challenging golf course, 6 clay tennis courts, private dining in the casual Tap Room or the elegant Grille Room, a junior Olympic swimming pool with a slide and covered pool pavilion, a state of the art fitness room, a full service golf pro shop, a beautiful banquet facility, event lawn and a spacious veranda

4. Also pursuant to your 11/26/24 testimony the following exhibits were submitted for utilization in determining flow rates for commercial facilities.
 - Petitioner’s Exhibit AJS-3: TDEC’s Design Criteria for Review of Sewage Works Construction Plans and Documents
 - Petitioner’s Exhibit AJS-4: North Carolina Guide for Assigning Equivalent Residential Units

The North Carolina exhibit indicates a significantly lower flow for country clubs than the Tennessee exhibit. Why was the data from Tennessee exhibit utilized?

5. In the 7/10/25 Order Setting Utility Rates “Commission Rate Design Exhibit, Page 1” the total amount of Phase One “Revenue Increase” indicated for Cartwright Commercial is \$132,454. Can you confirm this was to be the total revenue increase across all Cartwright Creek commercial customers and reconcile how Old Natchez’s increase of appx \$168,000 fits into this?
6. In the 7/10/25 Order Setting Utility Rates “Commission Rate Design Exhibit, Page 2” there are several sewer systems that indicate tap fee revenue was collected during the Base Year (and will also be collected during the Attrition Year), however at page 1 of the same Exhibit the number of determinants in the attrition year does not appear to have increased to reflect the additional customers that would have come on-line as a result of new tap connections in the Base Year. Can you advise if this accurate, and why known and projected new connections are not reflected in the number of determinants for the Attrition Year.
7. Additionally, as it appears the number of determinants between the Base Year and Attrition Year is unchanged (other than as a result of re-assigning or converting commercial customers to ERUs) can you advise as to how the number of tap fees was determined for the Base Year and Attrition Year and whether the number of determinants in the Attrition year accurately reflects the addition of new determinants?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Wednesday, August 20, 2025 9:19 AM

To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #9

Mr. Taylor,

Thanks for your email. Prior to responding to your questions directly, I'm going to request that you consolidate all of your questions/comments into one email and wait for my response prior to sending more. This morning alone, I am responding to 3 different email chains from you. While I understand that you are eager to get your questions answered, I want to ensure that we are communicating in the most efficient possible way and that I am answering all of your questions.

Limestone Water reviewed publicly available information regarding the Old Natchez Country Club (including the inclusion of a golf course, 6 tennis courts, private dining, junior olympic sized swimming pools, a fitness room, shops, banquet facilities, and verandas) and made a conservative estimate regarding total guest count and then average daily attendance. The methodology utilized to establish the guests per day at Old Natchez was not requested and therefore was not provided.

Similarly to with Old Natchez, Limestone Water utilized public records to determine maximum guest counts, attendance, number of seats in a given establishment, etc.

The testimony submitted was based on the tariffed rate. Because Limestone did not have access to water usage for Old Natchez, the bill was at a monthly minimum for the months since Limestone acquired the Grasslands facility. The tariff did include a monthly surcharge for capital improvements as well, which accounts for the difference between the \$37.00 flat rate and the monthly bills that you received.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, August 19, 2025 4:50 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #9

Mr. Silas –

Thank you for the clarification regarding the originally proposed monthly billing amount and its evolution timeline.

We are working to establish the most accurate method of estimating guests per day. As we continue this work, we believe it is most pertinent to establish what method Limestone utilized to estimate guests per day, and the assumptions that supported that method. Can you please advise of the method that Limestone utilized to establish the guests per day at Old Natchez and whether an explanation of this method was included in the submission to TPUC?

Relatedly, the Table that was submitted as “Petitioner’s Exhibit AJS-3” pursuant to your testimony on 7/16/24 (per Docket Room) as the basis for determining ERUs for commercial customers requires an estimation of “persons, guests,

passengers etc” for many types of facilities. Can you advise what method(s) were used to establish the “count per day” at the other types of commercial customers subject to the tariff, and how the methods used for those estimates were similar or different than the method used to estimate guests per day at Old Natchez?

Additionally, in “Petitioner’s Exhibit AJS-6”, also pursuant to your 7/16/24 testimony the “Present Rate” for Grassland Commercial Sewer Customers is submitted as \$37.00 *plus \$8.75 per 1,000 gallons* with additional reference to an average bill of 3,000 gallons. This does not align with the actual billing at Old Natchez. Can you advise why the billing at Old Natchez was different than that submitted to TPUC?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, August 19, 2025 3:39 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #8

Mr. Taylor,

Limestone Water originally proposed to charge a flat sewer rate of \$86.64 x ERU multipliers. For your Country Club, that would result in a monthly rate of \$7,191.12. Upon receiving the Chairman's Motion on 4/11, Limestone Water was directed to redo the rate design using the assumptions/base provided by TPUC. Limestone filed its amended proposal using those assumptions on 5/1/2025.

The Rate X ERU methodology was proposed in our original filing and was accepted. The number of guests per day was determined prior to filing. As I've mentioned before, if you can provide me with information that shows this number is different, I'd be happy to adjust your ERU and credit back the difference. In order to do so, I'll need the average daily/monthly guest count and some form of documentation which proves it.

Thanks!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, August 19, 2025 3:31 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #8

Mr. Silas –

Let me rephrase my last question for better clarity – as what we are trying to understand and establish is the timeline of establishing the rate for Old Natchez and how we could have known what that rate was.

You indicate that Limestone’s original proposal (July 2024) was not to charge Old Natchez \$14,000 per month.

What was the monthly amount to be charged Old Natchez in the original proposal?

Was the monthly amount to be charged Old Natchez changed subsequent to 4/11/25, if so on what date(s)?

Can you confirm that the Rate X ERU methodology was proposed originally and has always been in place? If so, can you advise upon what date and by what method Limestone determined the number of guests per day for Old Natchez that is necessary for this methodology to be utilized?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, August 19, 2025 12:56 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #7

Mr. Taylor,

The Original Application was filed in 7/2024. To be clear, the company always proposed to utilize the rate x ERU methodology, but there was no water usage component which is what I meant by "flat".

Limestone Water had no indication that its consolidation proposal would not be accepted until 4/11/2025.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, August 19, 2025 9:55 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #7

Mr. Silas –

Thank you for the quick reply to my inquiry.

Can you clarify the following re the timeline of the Notice vs. determination of the final rate for Old Natchez. What is the docket date of what you refer to as the “Original Application”, which you are indicating featured Limestone’s

proposal of flat rates for commercial wastewater customers? At what point (date) in the process was the rate plan for commercial wastewater customers changed from Limestone's original flat proposal to the Rate X ERU methodology?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, August 19, 2025 8:18 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #6

Mr. Taylor,

Please see the attached notice.

As far as the increases by customer, no there was no explicit information in the notice regarding individual increases for a number of reasons. Limestone's original proposal was not to charge \$14,000 per month and so there was no way of knowing at the time what the approved increase would be. Limestone's full proposal and methodology was spelled out in its original application and testimony which is referenced in the letter via the link to the docket.

Limestone's original proposal was to utilize the flat sewer charges, so the option to utilize water usage data to calculate wastewater bills was never formally presented by Limestone Water.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Monday, August 18, 2025 5:24 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: OLD NATCHEZ CC - cartwright creek review #6

Mr. Silas –

Thank you for providing the information below.

Can you provide me with a copy of the letter that was sent to Old Natchez.

Additionally, as the schedule of actual increases by customer was kept confidential, would there have been elsewhere in the Public Notice, in the results of the hearings or in the direct letter to Old Natchez details that our proposed rate increase was from approximately \$40 dollars per month to \$14,000 per month?

If so, can you please advise where this detail would have been available. We are trying to understand how it would have been possible from the information made available in the Public Notice and Hearing process for us to know that our proposed rate increase was so much greater than is presented in the discussion and public comment on this matter.

Lastly, as we have discussed previously, we historically provided the prior owners of Cartwright Creek Utility our actual water usage data that they in turn used in calculating our wastewater billing. This same usage data was readily available prior to the rate increase and remains available today. Since our actual usage data was and remains readily available can you advise if Limestone provided TPUC with the option of using actual usage data to determine our ERUs?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, August 18, 2025 3:38 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #5

Mr. Taylor,

I've pasted a link below that details Limestone Water's compliance with TPUC rule 1220-04-01-.05 pertaining to the publication and posting of notice of hearings in matters involving rate cases. Additionally, Limestone Water posted this public notice on our website with a link to the Commission docket. Following the first public comment hearing, Limestone Water took additional steps in excess of the formal rules and provided direct notice to all addresses on file in early February 2025 including a letter to Old Natchez Country Club specifically. The notice included FAQs, information on how to attend virtual meetings to get questions answered, and information on the Hearing dates. Additionally, an "e-blast" was sent to all customers with emails on file to inform them of the aforementioned items.

Please let me know if you have any additional questions.

Thanks!

<http://share.tn.gov/tra/orders/2024/2400044kr.pdf>

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Monday, August 18, 2025 3:21 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #5

Aaron –

As we continue to work on this I am trying to understand the Public Notice provisions of Limestone’s submission. Can you advise as to the Public Notice requirements, how they were satisfied and specifically if there were any provisions for notifying customers including Old Natchez Country Club directly?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, August 11, 2025 12:08 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #5

Mr. Taylor,

While I understand your interest in reviewing the full list of commercial customers and their billing amounts, I must reiterate that this information is considered confidential and cannot be shared externally. However, I want to assure you that all relevant data—including customer classifications, rate structures, and billing impact analyses—was submitted to the Tennessee Public Utility Commission (TPUC) as part of the rate case proceeding. TPUC staff thoroughly reviewed these materials, including the commercial rate design and associated revenue allocations, prior to issuing their final Order.

Please do not hesitate to reach out to me with any additional questions you may have.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Monday, August 11, 2025 11:55 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #5

Mr. Silas –

Can you send the full list of commercial customers with the names redacted, but the rate change information available?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, August 11, 2025 10:44 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #5

Mr. Taylor,

Unfortunately, the full list of commercial customers with billing amounts is confidential information so I am unable to provide that to you.

As far as the rate each category of waterwater customer was being charged, page 2 of the "Limestone Prior Rates" that I sent does include the tariffed rates that were in effect prior to Limestone's rate increase. That can be found in the "Present Rate" column. Please let me know what information you believe is missing here.

Thanks!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Monday, August 11, 2025 10:06 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: OLD NATCHEZ CC - cartwright creek review #5

Mr. Silas –

Thank you for sending the attached. However, I don't think it addresses my question below seeking rate in the last month prior to Limestone's first month.

Additionally, can you please send the full list of commercial waste water customers that you have previously indicated was submitted to TPUC, with the billing amounts – not just rates – for all customers.

Can you please advise of the rate each category of wastewater customer was being billed in the last month prior to Limestone's acquisition so that I can compare these to the rates in the petition.

Best Regards,
Glynn

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, August 4, 2025 11:56 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #4

Mr. Taylor,

A high level view of the prior rates can be found in the attached. The "Present Rate" column provides that breakdown.

Please let me know if you have any additional questions.

Thanks!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Monday, August 4, 2025 11:48 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #4

Mr. Silas –

I understand that the TDEC table is a tool for designing wastewater systems, specifically, referencing potential demand of different types of users. I am less clear that TPUC fully grasped the consequences of using this in an exercise that is clearly geared toward producing a new commercial rate schedule. I am simultaneously working with TPUC to establish that the rate increase applied to our company is completely not in keeping with the many references in the discussion section of the Order denying the Petition that reference a sense of fairness in the application of the targeted overall revenue increase, and the importance of considering the amount of increase applied to specific commercial customers. I understand, Limestone’s assertion that general references were made to the rates individual commercial customers would be paying and that a list of individual customers and rates was included in materials provided to TPUC. However, I am again less clear that the egregious increase applied to our company were expressly presented to TPUC staff and commissioners, or if they were left to be discovered “in the fine print”.

Much of my ongoing work on this matter will involve placing the increase that has been applied to our company in the context of increases across the customer base – as we obviously are asserting that we are being asked to carry an unfair and disproportionate amount of the targeted overall increase. Can you please advise of the rate each category of wastewater customer was being billed in the last month prior to Limestone’s acquisition so that I can compare these to the rates in the petition.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, July 29, 2025 1:58 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #4

Mr. Taylor,

First, thank you for your message.

To clarify, no — that is not how I would characterize the role of ERUs in this case. Limestone proposed, and the Commission accepted, a flat rate structure for its sewer systems as part of the most recent rate case. This means that actual water or wastewater flow data is not used to calculate monthly bills. Instead, ERUs serve as a proxy to estimate the maximum potential demand a customer may place on the system, not a direct measure of monthly usage.

While I understand and appreciate your perspective on empirical data, the use of standardized design flow estimates — such as those published by TDEC — was necessary due to the reality that we do not have water usage data for all sewer-only customers across the system. Applying a consistent methodology was essential to ensure uniformity and fairness in cost allocation across all commercial accounts.

That said, I recognize your concern about seasonal or event-based fluctuations. If you are able to provide monthly or seasonal data that you believe better reflects your average daily guest counts over time, I would be happy to review that information and work with you to refine the ERU estimate accordingly — within the framework of the approved rate design.

Please let me know if you'd like to discuss further or share that data.

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, July 29, 2025 1:23 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #4

Mr. Silas –

First, can we agree that the purpose of establishing an ERU for any customer is to further the determination of the actual wastewater flow for that customer?

Second, if we have bona fide empirical data readily available, and have offered to provide it, why can't it be used rather than a calculation based on data from a 30 year old design table and purely assumptive points regarding guest attendance, especially when the data from the design table is incredibly generalized, and any estimation of daily guest attendance would likewise either be blind to or filled with assumptions regarding the reality that our guest count varies by magnitudes based on many variable including seasons, weather, event presence, event attendance etc.

It must be noted that working from empirical data is not only more accurate, it's gathering and analysis is easily undertaken, as evidenced by the fact that when Schaefer Systems owned Cartwright Creek prior to Limestone, Old Natchez provided it to Schaefer Systems annually. As the TPUC Consumer Advocated noted multiple times in their filings related to the Petition, Limestone has simply elected to not ask for actual wastewater usage data that is readily available.

Best Regards,
Glynn Taylor
615-417-8219

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, July 29, 2025 12:59 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>

Cc: Carlos.Black@tn.gov

Subject: Re: OLD NATCHEZ CC - cartwright creek review #3

Mr. Taylor,

Thanks for your quick response. I apologize if this was relayed to you incorrectly, but the units are 250 units at 100 gallons per day. Unfortunately, the calculations do not consider billings from HVUD and instead utilize the table as referenced in my prior email. Again, if you are willing to provide information on average daily attendance figures, we are open to reviewing and potentially revising the assigned ERUs. At this time, that is the only path towards reassignment of the ERU values.

In reference to your last question, please treat communication with me as the process for your ERU calculation to be modified. Providing us updated information as to the average daily attendance figures and the employee count is the methodology for getting your ERU modified.

Thank you!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>

Sent: Tuesday, July 29, 2025 12:52 PM

To: Aaron Silas <asilas@cswrgroup.com>

Cc: Carlos.Black@tn.gov <Carlos.Black@tn.gov>

Subject: RE: OLD NATCHEZ CC - cartwright creek review #3

Mr. Silas –

Thank you for your responses. I will coordinate with TPUC to confirm them and understand how our particular rate was treated within their process.

After reviewing your responses, it must be noted that in my prior phone correspondence with Limestone, the ERU calculation was definitely reported to me as based on 497 customers at 50 gallons per day, not the 250 customers at 100 gallons per day your reference. It must be additionally noted that the assignment of the number of guests is in fact a “third variable” as it is not included in the TDEC table, it is not included in the Tarriff schedule, flow cannot be calculated without it and Limestone determined it purely at its discretion. In the same phone conversations, I confirmed with Limestone that I was requesting a review of our rate and that I could substantiate the significant error in Limestone's calculations by simply assembling billings from our water provider, HVUD. I offered to provide empirical data to refute the arbitrary calculation. To date, I have received no follow-up correspondence from Limestone in this regard, other than your information in the email below confirming that Limestone unilaterally, without prior consultation with Old Natchez, made assumptions as to the number of persons by which the per person flow data would be multiplied. Again, this is after I had previously advised Limestone that these assumptions were wildly inaccurate and that there was no need to even make assumptions because real empirical data was readily available.

In the cover letter you reference (section below) it seems that Limestone is to have a process for commercial customers to provide information to potentially cause an ERU calculation to be modified. Can you please advise as to how this process is to be pursued?

Limestone Water's tariff (page 6) describes the derivation of assigned ERUs utilizing the Tennessee Department of Environment & Conservation sewage works construction plans and documents. Through this derivation, a commercial customer may provide Limestone Water with substantive information relative to its assigned ERUs, which, depending upon such information, may lead to a lower or higher ERU assignment.

Best Regards,
Glynn Taylor
615-417-8219

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, July 29, 2025 11:58 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #3

Mr. Taylor,

Thank you for your detailed message regarding the wastewater service charges for Old Natchez Country Club and the associated rate design approved in TPUC Docket No. 24-00044. In an effort to resolve this matter efficiently and transparently, please see below Limestone's responses to your questions and concerns:



Rate Design & TPUC Order Clarifications

TPUC denial of the Petition vs. approval of the tariff

- a. While TPUC denied Limestone's Petition as filed, the Commission explicitly approved various components of the filing and the Company's proposed tariff on May 22, 2025. That tariff, effective as of May 1, 2025, authorizes the rates currently in place. The final Order details the specific portions of the Petition and supporting documents that were adopted by the Commission, including the commercial rate design framework.

b. Components of the approved rate design

Confirmed. The rate design consists of the following components:

- The table found on the first page following the cover letter in the May 19, 2025 filing (also Attachment 4 of the Final Order)
- The commercial tariff section, including the footnote on page 10, which outlines that ERUs are assigned based on typical wastewater flows from TDEC's "Plans Review and Approval of Sewage Works Construction Plans and Documents."



Questions Regarding the Monthly Rate Charged

a. Confirmation of the correct rate table

Confirmed. The table in Attachment 4 of the Final Order ("Commission Rate Design Exhibit, Page 1") is the approved rate design.

b. I. Analysis showing \$167,782.44 attributed to Old Natchez Country Club

Yes, the May 1, 2025 cover letter informed TPUC that certain commercial customer bills would range from \$4,020.44 to \$15,890.32. Additionally, the Company submitted a confidential filing to TPUC showing bill impacts by customer, including the monthly charge assigned to Old Natchez. These materials were reviewed by TPUC staff.

b. II. Was TPUC made aware of the 31,420% increase?

TPUC was provided with all billing impact analyses. It is important to clarify that the percentages shown in the Order reflect test year revenues calculated using assumed usage. Old Natchez was historically billed based on a nominal fixed rate with no flow-based allocation. Consequently, the percentage change appears extreme when compared to the newly aligned cost-based methodology.

b. III. Revenue share shift from 0.2% to 40%

TPUC was provided with the Company's workpapers, which included all revenue allocations and calculations for Cartwright Creek's commercial class. As noted above, the prior revenue from Old Natchez was not representative of actual demand. The overall revenue requirement for Cartwright Creek commercial sewer customers is \$421,000 annually.



ERU Derivation Methodology

Limestone assigned 83.33 ERUs to Old Natchez Country Club using the TDEC table for wastewater flows, which defines a country club's flow as 100 gallons per guest per day. We assumed a conservative daily average of 250 guests:

$$250 \text{ guests/day} \times 100 \text{ gallons} = 25,000 \text{ GPD} \div 300 \text{ GPD per ERU} = 83.33 \text{ ERUs}$$

We did not include employee counts in our original calculation. However, we have since learned that the club may serve up to 1,100 members and employ 48 staff. Based on that information, the 250-guest assumption appears to be a conservative estimate.

If you are willing to provide average daily attendance figures, we are open to reviewing and potentially revising the assigned ERUs to ensure accuracy and fairness.



Regarding the Assertion of an Arbitrary Variable

To be clear, there is no third, arbitrary variable introduced. The methodology follows this formula:

$$(\text{Flow from TDEC table}) \div 300 = \text{ERUs} \times \$168.96 = \text{Monthly Rate}$$

All calculations were filed with TPUC and reviewed as part of the docket. No discretionary multiplier was applied beyond the use of a daily guest count, which was selected conservatively and based on TDEC's approved methodology.



Closing

We understand the magnitude of the increase may be jarring, particularly when transitioning from a nominal flat rate to a flow-based rate that reflects actual system demands. However, this change aligns with both regulatory principles and TPUC directives aimed at creating equitable cost recovery based on usage.

If your team can provide documentation or logs showing actual average daily usage (guests and employees), we would welcome the opportunity to work with you to validate or adjust the assigned ERUs. Please let me know if I missed any of your requested information Mr. Taylor.

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Friday, July 25, 2025 6:13 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: OLD NATCHEZ CC - cartwright creek review #3

Mr. Silas –

As I assume you are aware, I am working to resolve a complaint filed with the TPUC (TRA File No. 250201) on behalf of Old Natchez Country Club, “our company”,

In the thread below Ms. Lindley has responded on behalf of Limestone to questions I posed regarding the basis of the increase in the wastewater charge to “our company” from \$44.50/month, to **\$14,026.47/month** – an increase of \$13,981.87/month or 31,420%.

Specifically, my request for details of a rate design for commercial sewer customers “rate design” that is referenced at page 107 of TPUCs 7/10/2025 Order Setting Utility Rates, “the order”, and the status of such “rate design” following the TPUC’s denial of Limestone’s 5/1/2025 Petition “the petition” that was the conclusion of “the order”.

Ms. Lindley has indicated:

- a. Despite TPUC’s denial of Limestone’s Petition in “the order”, the “rate design” was approved by TPUC, and
- b. That such “rate design” consists of components of “the petition”, specifically:
 - I. The table on the first page following the cover letter entitled “Commission Rate Rate Design Exhibit 1, Page 1”, and
 - II. The tariff section, specifically the footnote on page 10:
 - i. “Equivalent Residential Units (“ERU’s”) have been assigned to each Commercial Customer utilizing typical wastewater flow rates derived from the Tennessee Department of Environment and Conversation “Plans Review and Approval of Sewage Works Construction Plans and Documents”

Can you please elaborate upon/reconcile the following points related to the **\$14,026.47/month** rate we are being charged, which Limestone asserts has been approved by TPUC, and comments and directives included in “the order”, especially page 107, which is attached for convenience of reference.

- a. Please confirm that the table referenced in “the petition” has been replaced by the table in Attachment 4 of “the order” entitled “Commission Rate Design Exhibit, Page 1”
- b. As indicated on page 107, TPUC has “directed Limestone to file a rate design for commercial sewer customers to generate an additional \$242,076 from sewer customers representing a 63.61% increase in overall commercial

sewer revenues”. If as Limestone asserts, the “rate design” consists of the components referenced by Ms. Lindley above:

- I. Was TPUC provided additional analysis evidencing that the dollar amount increase borne by “our company” would be \$167,782.44 or 69.3% of the total additional revenue to be generated across all Limestone commercial sewer customers? If such analysis was provided, please forward it to “our company”.
 - II. Was TPUC provided additional analysis evidencing that the percentage increase in billings to “our company” would be 31,420% vs the targeted overall 63.61% increase across all Limestone commercial customers? If such analysis was provided, please forward it to “our company”.
 - III. Was TPUC provided additional analysis evidencing that the sewer revenue of “our company” as a percentage of the total Cartwright – Commercial sewer revenue would increase from 0.2% during the “test period” of the 12 months ending 4/30/24, to 40% for the 12 months of the Attrition Period beginning 5/1/25? If such analysis was provided, please forward it to “our company”.
- c. Was TPUC provided additional analysis evidencing that it is not possible utilizing the two components of the “rate design” that Limestone references, to calculate an actual monthly rate for “our company” and that a third variable was required, and that this third variable was arbitrarily set by Limestone to establish the **\$14,026.47/month** rate charged “our company”? If such analysis was provided, please forward it to “our company”.

Limestone claims the “rate design” will produce the approved rate for “our company” by multiplying the rate for commercial customers from the referenced table in “the order”, by the number of ERU’s assigned to “our company”, and that such assigned ERUs have been determined “utilizing typical wastewater flow rates derived from the Tennessee Department of Environment and Conversation Plans Review and Approval of Sewage Works Construction Plans and Documents”. However, The entry for Country Clubs in “APPENDIX 2-A DESIGN BASIS FOR WASTEWATER FLOW AND LOADING Typical Wastewater Flow Rates from Commercial and Industrial Sources” from TDEC’s “Plans Review and Approval of Sewage Works Construction Plans and Documents” as referenced in “the petition”, indicates only the units of estimation for a country club as “guests on site” and “employee” and a typical flow (gallons/unit/day) of 100 gallons for guests and 13 gallons for employees. The table does not include a typical quantity for the units of estimation which is required to calculate a total estimated flow for the facility (units of estimation multiplied by estimated flow/unit) which can then be divided by the base residential unit flow of 300 gallons to calculate an estimated ERU. Limestone resolved the fact that there is no reference for the quantity of units in the “rate design” by arbitrarily establishing that the quantity of units for “our company” was 497, indicating that for every day of the month and every month of the year there are 497 persons at our facility producing 50 gallons each of wastewater. When I asked representatives from Limestone the basis of this quantity of units of estimation they could not advise of any supporting calculation or assumptions, and I confirmed to them that no representative from Limestone had contacted “our company” for any measure of research as to the number of guests or employees present at “our company” – thus our assertion that Limestone’s estimation was arbitrary.

Please advise on all points above, pursuant to our efforts to resolve our complaint with TPUC.

Obviously “our company” believes that the increase in the wastewater charge to “our company” from \$44.50/month to **\$14,026.47/month** – an increase of \$13,981.87/month or 31,420% is wholly without merit and should be withdrawn and

reestablished to reflect a principle of basic fairness that would result in our contribution to the overall increase in commercial sewer revenues established by TPUC being of the same proportion as our contribution to total commercial sewer revenue that it was prior to the increase.

Best Regards,

Glynn Taylor

President, Old Natchez Country Club

glynn.taylor@oldnatchezcc.com

615-417-8219

From: Tricia Lindley <TLindley@cswrgroup.com>
Sent: Thursday, July 17, 2025 3:08 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Aaron Silas <asilas@cswrgroup.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #2

Mr. Taylor,

Thank you for your question.

For reference, the commercial sewer rate design can be found on page 3 under "Sewer, Cartwright – Commercial." You'll also find the approved rate information in the tariff section on page 10.

I've copied Aaron Silas, Assistant VP, Customer Experience & Regulatory Operations, on this message in case you have any additional questions or need further clarification.

Please don't hesitate to reach out if we can assist further.

Best regards,



Tricia Lindley

Call Center Manager

Email: tlindley@cswrgroup.com

O: (314) 380 - 8550

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131

www.centralstateswaterresources.com



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Thursday, July 17, 2025 7:52 AM
To: Tricia Lindley <TLindley@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #2

Ms. Lindley –

What page of the original petition that you provided a link to is specifically the **rate design for commercial sewer customers?**

Best Regards,
Glynn Taylor

From: Tricia Lindley <TLindley@cswrgroup.com>
Sent: Wednesday, July 16, 2025 3:41 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #2

Mr. Taylor,

Thank you for reaching out and for your careful review of the Tennessee Public Utility Commission's (TPUC) Final Order related to Limestone Water Utility Operating Company's rate petition. While the Commission did deny Limestone's petition as filed in its entirety, it's important to note that certain elements were **approved and adopted** by the Commission—specifically, the commercial sewer rate design, which can be reviewed here: <http://share.tn.gov/tra/orders/2024/2400044ob.pdf> Based on that approval, the billing rate currently being applied to Old Natchez Country Club is correct as rendered and reflects the Commission-approved rate design. Please let me know if you have any questions.
Best regards,
Tricia



Tricia Lindley

Call Center Manager

Email: tlindley@cswrgroup.com

O: (314) 380 - 8550

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131

www.centralstateswaterresources.com



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Wednesday, July 16, 2025 3:05 PM
To: Tricia Lindley <TLindley@cswrgroup.com>
Subject: OLD NATCHEZ CC - cartwright creek review #2

Ms. Lindley –

I see that the Petition for the Limestone Rate Increase has been denied

<https://share.tn.gov/tra/orders/2024/2400044of.pdf>

VI. IT IS THEREFORE ORDERED THAT: 1. Limestone Water Utility Operating Company, LLC's Petition, including the proposed rates and rate design, filed on July 16, 2024, is denied.

page 109

Additionally I see that in the order denied the Petition that Limestone is supposed to be developing a rate design for commercial customers

*In developing the phase one rate design, the panel prioritized maintaining affordable residential rates and shifting a higher portion of the additional revenue increase to commercial sewer customers. Depending on the system, the panel's rate design will increase water and sewer rates for residential customers between 20% and 40%.³⁹⁷ The panel adopted a 63.61% overall revenue increase to the commercial sewer customers. However, the panel did not have enough underlying data for sewer billing determinants to set commercial sewer rates. Basing a rate design on this questionable data could result in extreme rate increases to certain groups of commercial customers, especially small customers such as small offices, which tend to have low sewer usage. Further complicating this problem, Limestone recommended one consolidated sewer rate for all systems. **Therefore, the panel directed Limestone to file a rate design for commercial sewer customers to generate an additional \$242,076 from sewer customers, representing a 63.61% increase in overall commercial sewer revenues. Further, Limestone was directed to work with Commission Staff to implement the rate design ordered herein.**³⁹⁸*

Page 107

Can you please advise what the current status of the billing rate is for Old Natchez Country Club based on the Petition being denied and the fact that it seems there is supposed to be a commercial rate design plan that has not been submitted or approved. It seems that we should be being billed our old rate until a new commercial rate design plan is approved. Lastly, please advise how we can be involved in the process of commenting on a commercial rate design plan.

Best Regards,
Glynn Taylor

From: Tricia Lindley <TLindley@cswrgroup.com>
Sent: Wednesday, July 2, 2025 2:46 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - follow-up

Hi Mr. Taylor,

That's a great question—thank you for asking.

The rate structure for all Cartwright Creek service areas was established prior to Limestone taking ownership, so we are not aware of the specific assumptions that were used to differentiate rates between 1–2, 3, 4, and 5-bedroom units.

For the commercial ERU calculations in this rate case, we relied on the **TDEC-assumed flow values** that were referenced earlier. These are the only assumptions Limestone has applied as part of this rate adjustment process.

Thanks,



Tricia Lindley

Call Center Manager

Email: tlindley@cswrgroup.com

O: (314) 380 - 8550

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131

www.centralstateswaterresources.com



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Wednesday, July 2, 2025 12:42 PM
To: Tricia Lindley <TLindley@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - follow-up

Tricia –

Thank you for the quick reply – are there any assumptions regarding the gallons/units/day for 1-2 bedroom vs 3 bedroom vs 4 bedroom vs 5 bedroom? Or are the rate differences between the size units deemed to be reflective of the difference in gallons/units/day?

Glynn

From: Tricia Lindley <TLindley@cswrgroup.com>
Sent: Wednesday, July 2, 2025 12:29 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - follow-up

Mr. Taylor,

Thanks again for taking my call this morning.

The PUC has assigned you a case number that we have for reference and will be noted on your account.

The flow for a residential house as outlined in the Design Basis for Wastewater Flow and Loading, is typically 300 gallons/unit/day.

Thanks,



Tricia Lindley

Call Center Manager

Email: tlindley@cswrgroup.com

O: (314) 380 - 8550

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131

www.centralstateswaterresources.com



From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Wednesday, July 2, 2025 11:22 AM
To: Tricia Lindley <TLindley@cswrgroup.com>
Subject: OLD NATCHEZ CC - follow-up

Tricia –

Thanks for your time via phone just now. I will try and finish my analysis and reply today, but it may be after the holiday before I can send.

Could you please provide me with 2 information items today if possible.

- Any case # that has been assigned to our case.
- The assumed monthly flow rate for the 1-2 bedroom, 3 bedroom, 4 bedroom and 5 bedroom residential units in Cartwright-Grassland

Best Regards,
Glynn Taylor
615 417 8219

From: Tricia Lindley <TLindley@cswrgroup.com>
Sent: Monday, June 30, 2025 10:30 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: LimestoneWater

Hi Mr. Taylor,

I'm reaching out in response to your concerns regarding your current invoice from Limestone Water. Part of the billing calculation is based on the number of members and staff at the country club. If you could please provide that information, I'll review our records and ensure any adjustments, if warranted, are made.

The chart below is an excerpt from the "Design Basis for Wastewater Flow and Loading .

Facility	Unit	Flow, Gallons/Unit/Day	
		Range	Typical
Country Club	Guests on-site	60-130	100
	Employee	10-15	13

Thanks,



Tricia Lindley

Call Center Manager

Email: tlindley@cswrgroup.com

O: (314) 380 - 8550

1630 Des Peres Rd., Ste. 140, Des Peres, MO 63131
www.centralstateswaterresources.com

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

Thank you again for your email below! I've confirmed that we are comfortable adjusting your ERU assignment using the methodology presented (water usage to get to an average daily guest count). Prior to making this change, I'd like to ask your permission to contact the Harpeth Valley Utility District to confirm the information you've provided. Once I get that confirmation, I'll make the ERU adjustment, credit back the difference, and remove late fees as appropriate for your outstanding balance.

For your second point, Limestone is also considering ways to ensure we have the most up to date information from its commercial customers prior to Phase 2 of the rate increase. As such, we are planning a data gathering campaign for appropriate ERU adjustments to present to the Commission.

Please let me know if you have any questions/concerns.

Thanks!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Wednesday, September 10, 2025 10:51 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

Confirming receipt of the below email. I will look through this data and get back to you.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, September 9, 2025 7:15 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - calculations

Mr. Silas –

Thank you for your time via telephone today. Please confirm receipt of this email.

Please see attached, 12 months of invoices from HVUD and corresponding calculations to support establishment of the following items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities:

- Daily "guests on site" = 41
- ERUs = 14
- Monthly Billing Amount = \$2,365.44 - *retroactive to May 2025*

As we discussed, our preparations for filing a formal complaint with TPUC are grounded in the following points that we believe the Consumer Advocate's office will buttress and expand upon, and that the Commission will conclude constitutes a logical and compelling case for adjustment of our rate and review of the broader commercial rate design:

- The methodology utilized to estimate "guests on site per day" for Old Natchez Country Club, which Limestone described as "utilizing publicly available information", resulted in an assignment of ERUs that is inaccurate by a magnitude of approximately 6x at 83 vs 14. This inaccuracy was caused by Limestone's eschewing any direct consultation with Old Natchez or other proportional due diligence, in favor of arbitrarily extrapolating that Old Natchez had 250 guests on site per day based solely on a list of our physical facilities.
- The actual guests on site per day can be easily calculated – as attached – utilizing actual flow data that has been readily available throughout the rate design process.
- The veracity, and therefore the practical usefulness, of the commercial rate design in its current state is questionable because the same inaccuracy evidenced in the initial assignment of ERUs to Old Natchez is not isolated and likely extends throughout the list of commercial customers at the core of the plan - "Exhibit DR 2-18 ERU Summary". This point is supported by the examples I provided in our call to the specific inaccuracies associated with Bethlehem United Methodist Church (1 ERU) , Sonic Drive-in (1 ERU), Barabara's Home Cooking (1 ERU) and The Troubador Golf Club (5 ERUs) all of which have fewer ERUs than is realistic causing the funding of TPUC's target increase to be unfairly borne by other commercial customers.
- It is likely that TPUC has been blind to both the amount of error in the initially assigned ERUs and the full methodology utilized in assigning ERUs because the submissions by Limestone to TPUC pertinent to development of the commercial rate design did not introduce or explain what methodology Limestone would utilize to determine the "second variable" of guest counts, seat counts etc that is critical to making ERU assignments that are accurate. The evidentiary record reflects that TPUC was provided only "Exhibit DR 2-18 ERU Summary" and "Exhibit AJS-3" and "Exhibit AJS-4".

I look forward to working within the framework of Limestone's discretion to review ERU calculations and TPUC's complaint protocols to bring this matter to a fair and accurate conclusion.

Best Regards,

Glynn Taylor

glynn.taylor@oldnatchezcc.com

615 417 8219

of service since 1995

Glynn Taylor

From: Glynn Taylor
Sent: Tuesday, September 9, 2025 7:16 PM
To: 'Aaron Silas'
Subject: OLD NATCHEZ - calculations
Attachments: OLD NATCHEZ - calculation.eru.monthly.bill.pdf

Mr. Silas –

Thank you for your time via telephone today. Please confirm receipt of this email.

Please see attached, 12 months of invoices from HVUD and corresponding calculations to support establishment of the following items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities:

- Daily "guests on site" = 41
- ERUs = 14
- Monthly Billing Amount = \$2,365.44 - *retroactive to May 2025*

As we discussed, our preparations for filing a formal complaint with TPUC are grounded in the following points that we believe the Consumer Advocate's office will buttress and expand upon, and that the Commission will conclude constitutes a logical and compelling case for adjustment of our rate and review of the broader commercial rate design:

- The methodology utilized to estimate "guests on site per day" for Old Natchez Country Club, which Limestone described as "utilizing publicly available information", resulted in an assignment of ERUs that is inaccurate by a magnitude of approximately 6x at 83 vs 14. This inaccuracy was caused by Limestone's eschewing any direct consultation with Old Natchez or other proportional due diligence, in favor of arbitrarily extrapolating that Old Natchez had 250 guests on site per day based solely on a list of our physical facilities.
- The actual guests on site per day can be easily calculated – as attached – utilizing actual flow data that has been readily available throughout the rate design process.
- The veracity, and therefore the practical usefulness, of the commercial rate design in its current state is questionable because the same inaccuracy evidenced in the initial assignment of ERUs to Old Natchez is not isolated and likely extends throughout the list of commercial customers at the core of the plan - "Exhibit DR 2-18 ERU Summary". This point is supported by the examples I provided in our call to the specific inaccuracies associated with Bethlehem United Methodist Church (1 ERU) , Sonic Drive-in (1 ERU), Barabara's Home Cooking (1 ERU) and The Troubador Golf Club (5 ERUs) all of which have fewer ERUs than is realistic causing the funding of TPUC's target increase to be unfairly borne by other commercial customers.
- It is likely that TPUC has been blind to both the amount of error in the initially assigned ERUs and the full methodology utilized in assigning ERUs because the submissions by Limestone to TPUC pertinent to development of the commercial rate design did not introduce or explain what methodology Limestone would utilize to determine the "second variable" of guest counts, seat counts etc that is critical to making ERU assignments that are accurate. The evidentiary record reflects that TPUC was provided only "Exhibit DR 2-18 ERU Summary" and "Exhibit AJS-3" and "Exhibit AJS-4".

I look forward to working within the framework of Limestone's discretion to review ERU calculations and TPUC's complaint protocols to bring this matter to a fair and accurate conclusion.

Best Regards,

Glynn Taylor

glynn.taylor@oldnatchezcc.com

615 417 8219

of service since 1995

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, October 21, 2025 10:19 AM
To: Glynn Taylor
Subject: Re: OLD NATCHEZ - follow-up.10.8.25

Mr. Taylor,

I have confirmed that the ERUs on your account will be updated to 20 to reflect the updated information. As such, your monthly charge will be \$3,379.20. I've instructed our team to bring your balance to \$16,884.81. I would recommend paying this as soon as possible to avoid any further late fees.

Thanks!

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Wednesday, October 8, 2025 11:25 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - follow-up.10.8.25

Mr. Taylor,

I still need to confirm what information has been provided. Once I confirm that all the data is accurate, I will act accordingly.

Again, once I have time to review what has been provided, I will reach out.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Wednesday, October 8, 2025 11:16 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - follow-up.10.8.25

Mr. Silas –

I will look for your update.

Can you clarify your statement below “the direction Limestone is taking”.

As Limestone has previously indicated that the most recent 12 months of wastewater flow would be the basis of recalculating the ERU is Limestone indicating that it is contemplating an outcome other than what has previously been agreed to?

Please Advise.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Wednesday, October 8, 2025 8:42 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - meter confirmation

Mr. Taylor,

Thank you for following up! My plan is to review and inform you of the direction Limestone is taking well before the next bill is issued.

Thanks,

Aaron Silas
Assistant VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Wednesday, October 8, 2025 8:08 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: FW: OLD NATCHEZ - meter confirmation

Mr. Silas –
Just following-up on below.
Best Regards,
Glynn Taylor

From: Glynn Taylor
Sent: Thursday, October 2, 2025 4:31 PM
To: 'Aaron Silas' <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - meter confirmation

Mr. Silas –

Per my email earlier this week, see below correspondence from HVUD verifying the meter > service > billing relationship for the two primary meters at Old Natchez Country Club.

I have also attached a scan of the billings for the CLUBHOUSE meter for the trailing 12 months from August 2025. You have our permission if you need to contact Ms. Sandler to get your own copy of the usage for Account #210669-110788.

Once you have confirmed the wastewater flows based on this now accurate reading please confirm that our ERU will be updated to **20** and our monthly billing will be updated to **\$3,342.57** per the attached spreadsheet – both effective with the 11/1/25, billing date – with credits retroactive to the 6/1/25 billing date.

Best Regards,
Glynn Taylor

From: Michelle Sadler <msadler@hvud.com>
Sent: Thursday, October 2, 2025 3:29 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Old Natchez Country Club

Mr. Taylor,

This is to confirm that our Field Technician was on site at Old Natchez Country Club today. He was able to verify Account #210668-110787 was connected to the pool and now appears in our meter reading and billing systems with the description “Pool”, and that Account #210669-110788 was connected to the Clubhouse and Zone 1 Irrigation and now appears in our meter reading and billing systems with the description “Clubhouse”.

Thanks,

Michelle Sadler
Harpeth Valley Utilities District
P O Box 210319
Nashville, TN 37221
615-354-8517

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail,

upon:

Melvin J. Malone, Esq,
Butler Snow LLP
150 3rd Avenue S, Suite 1600
Nashville, TN 37201
melvin.malone@butlersnow.com

Russ Mitten, Esq,
General Counsel – Central States Water Resources
1630 Des Peres Road, Suite 140
St. Louis, MO 63131
rmitten@cswrgroup.com

This 26th day of March, 2026.



VANCE BROEMEL
Senior Assistant Attorney General