

TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

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Room April 3, 2026 at 8:17 a.m.

April 3, 2026

Docket 24-00044

David Woodsmall
General Counsel
Central States Water Resources
1630 Des Peres Road, Suite 140
Des Peres, MO 63131
dwoodsmall@cswrgroup.com

sent via email

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 Mr. Woodsmall:

To assist the Commission in its continuing evaluation of this matter, please respond to the following requests for information:

1. Please provide the monthly billed usage for each Aqua water customer, categorized by meter size, from January 2025 through the most recent month available.
2. The estimated water usage for the Phase 1 rate case was 21,240,360 gallons, based on an average monthly consumption of 1,770,030 gallons, as shown in the Company's Exhibit AJS 5.1. However, the actual billed water usage for the 12-month period ending December 31, 2025, was only 14,033,940 gallons. This actual usage level is significantly lower than the Phase 1 billing determinants approved in the rate case. Please explain the reasons for this decline in water usage. Specifically, indicate whether the decrease is due to changes in metering, billing adjustments, operational modifications, or other contributing factors.
3. Please provide copies of all bills from the Savannah Utility Department that show purchased water in gallons from January 2025 to the most recent month available.
4. Please provide a narrative explaining the justification for each individual rate increase. For example, Limestone has proposed raising the DSH commercial rate in Phase 2 from \$55.00 to \$57.60 per Equivalent Residential Unit (ERU) for commercial customers, resulting in a

4.72% increase. In contrast, Limestone has proposed increasing the Shiloh Falls commercial rate from \$55.60 to \$163.92 per ERU, representing a substantially larger increase of 194.82%. Please explain the reasoning behind these differences and provide justification for each rate adjustment.

A response is requested no later than Tuesday, April 7. In accordance with the Commission's rules, please submit your response electronically to the Docket Manager at tpuc.docketroom@tn.gov with the original and four copies also mailed to the Docket Manager. Should you have questions or need clarification of this request, please contact me at michelle.mairs@tn.gov.

Sincerely,

Michelle Mairs

Michelle Mairs, Director of Utility Audit and Compliance
Utilities Division

cc: Docket File
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