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April 17, 2026

Electronically Filed in TPUC Docket Room on April 17, 2026 at 12:56 p.m.

VIA ELECTRONIC FILING

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

RE: ***Petition of Limestone Water Utility Operating Company, LLC to Increase Charges, Fees and Rates and for Approval of a General Rate Increase and Consolidated Rates [Phase 2 Increase],*** **TPUC Docket No. 24-00044**

Dear Chairman Jones:

Limestone Water Utility Operating Company, LLC ("Limestone") is submitting this filing in response to the Consumer Advocate Division's ("CAD") request regarding a re-evaluation by Limestone of its previous designation of certain previously filed documents to Limestone's Responses to CAD's First Discovery Requests as **CONFIDENTIAL INFORMATION**. In the spirit of cooperation and good faith, Limestone herein submits supplemental responses and removes in whole, or in part, certain previous confidential designation and submits public version accordingly. The supplemental responses relate to CAD DRs 1-3, 1-6, 1-8, 1-9, and 1-18.

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

Very truly yours,

BUTLER SNOW LLP

Melvin J. Malone

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

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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 SUPPLEMENTAL RESPONSES TO CONSUMER ADVOCATE'S FIRST SET OF DISCOVERY REQUESTS

Limestone Water Utility Operating Company, LLC ("Limestone"), by and through counsel, hereby submits its Supplemental 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.

SUPPLEMENTAL RESPONSES TO FIRST SET OF DISCOVERY REQUESTS

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).[1]
- 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:

[1] *Id.*

a. Provide the "available water usage data" used to update the customer's ERU assignment.
b. Explain how Limestone obtained the water usage data.
c. Explain why water usage data is an "alternative proxy" to estimate average daily activity levels.
d. Explain why water usage data is not a preferred method for estimating wastewater volumes when wastewater is not directly measured.
e. Provide copies of all communication between Limestone representatives and representatives of Old Natchez Country Club.[2]
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

[2] 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).

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 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.

SUPPLEMENTAL RESPONSE:

e. A public version of the Customer Emails previously marked confidential are attached as **Public 1-3(e) Customer Emails**.

f. A public version of the previously filed as **CONFIDENTIAL** attachment for all account logs between 5.1.2025 and 3.2.2026 is attached as **Public 1-3(f) Customer Call Logs (5.1 – 3.2)**.

i. A public version of the document previously submitted as **CONFIDENTIAL** 1-3 Rate Increase Customer Comms, which is a log of customer contacts, is attached as **Public 1-3(i) Rate Increase Customer Comms (Log of Customer Contacts)**. Limestone has redacted identifying information.

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.

SUPPLEMENTAL RESPONSE: A public version of CONFIDENTIAL 1-6 Commercial Bill Detail is attached as **Public 1-6 Commercial Bill Detail**. Limestone has redacted identifying information.

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.

SUPPLEMENTAL RESPONSE: The Phase 1 Commercial Detail spreadsheet previously filed as confidential is attached as **Public 1-8 Comm Detail**. Limestone has redacted identifying information. A public version of the **Facility Type spreadsheet** previously filed within the CONFIDENTIAL Phase 1 Commercial Detail spreadsheet is also attached.

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."[3]

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.

SUPPLEMENTAL RESPONSE: A public version of a detailed summary of the TN Bill Analysis document is attached as **Public 1-9 TN Bill Analysis**. Limestone has redacted identifying information. The underlying raw data included in the previous confidential filing, which consists of well over 1,000 pages, is not included, as attempts to compile a public version of the same has resulted in multiple system crashes.

For clarification, Exhibits AJS1, AJS2 and AJS are attached to the Pre-filed Direct Testimony of Limestone Witness Aaron Silas as non-confidential. A public version of previously filed CONFIDENTIAL Proposed Phase 2 Final Limestone Rate Design is attached as **Public 1-9 Proposed Phase 2 Final Limestone Rate Design**. Limestone has redacted identifying information.

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

1-18. **<u>Source & Support</u>.** 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.

SUPPLEMENTAL RESPONSE: A public version of the Design Basis Support document is attached as **Public Updated 1-18 Design Basis Support**. Limestone has redacted identifying information.

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

Attorneys for Limestone Water Utility Operating Company, LLC

Public 1-3(e)

Customer Emails

Outlook

FW: OLD NATCHEZ - meter confirmation

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Wed 10/8/2025 8:10 AM
To Aaron Silas <asilas@cswrgroup.com>

2 attachments (836 KB)
OLD NATCHEZ - hvud.#210669.invoices.pdf; LIMESTONE - analysis.9.29.25.xlsx;

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

Outlook

FW: OLD NATCHEZ CC - cartwright creek review #9.a

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 8/19/2025 6:44 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

Mr. Silas –

Pursuant to further understanding the methodology for calculating ERUs and the utilization of guests per day in that calculation can you advise re the following:

As it is in the public record, can you please provide us with an Excel version of the attachment "DR 2-18 ERU Summary" that was submitted pursuant to Limestone's response to the second discovery request of the CAD dated 11/26/24.

Additionally, can you please advise of the methodology that was utilized to establish daily guest counts at two other Country Clubs included in the attachment "DR 2-18 ERU Summary":
The Club at Shiloh Falls at 33 ERUs, and more interestingly the Troubador Golf & Field Club (8000 Clubview Drive) at 5 ERUs?

Best Regards,
Glynn Taylor

From: Glynn Taylor
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 Sustomers 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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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,

CSWR
Central States Water Resources

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

Outlook

FW: OLD NATCHEZ CC - cartwright creek review #10

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 8/19/2025 6:22 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

Mr. Silas –

Can you please elaborate on the how the two phase approach to the rate increases at present, has been and will be implemented in the case of Old Natchez i.e. if our current proposed monthly rate effective 5/1/25 is appx $14,000, what will it be effective 5/1/26.

Best Regards,
Glynn Taylor

From: Glynn Taylor
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 Sustomers 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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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,

CSWR
Central States Water Resources

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

CSWR
Central States Water Resources

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

Outlook

OLD NATCHEZ - calculations

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 9/9/2025 7:17 PM
To Aaron Silas <asilas@cswrgroup.com>

1 attachment (4 MB)
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 OId 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

Outlook

OLD NATCHEZ - calculations.revised

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Wed 9/24/2025 4:30 PM
To Aaron Silas <asilas@cswrgroup.com>

2 attachments (417 KB)
OLD NATCHEZ - calculation.revised.pdf; HVUD - historical.pdf;

Mr. Silas –

Sorry for lag in providing feedback. Needed to gather expanded data from HVUD and was out of office for a couple days.

Please reference the below discussion and the attached as explanation of a "restatement" from our previous submission of items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities as follows:

- Daily "guests on site" = 57 …*increased from 41*
- ERUs = 19 …*increased from 14*
- Monthly Billing Amount Retroactive to May 2025 = $3,210.24 …*increased from $2,365.44*

Upon your presentation of HVUD data for the period 8/25>7/24, it was immediately evident the total for that period was 200+% greater than the total for the period 5/24>6/23 submitted by Old Natchez. As there was no substantive change in operations across the two periods, an increase of such magnitude warrants additional due diligence to validate the accuracy of the data given its central role in correctly re-calculating ERUs for Old Natchez.

As we assembled 3 trailing years of HVUD meter data for each month beginning with August 2025, it was instantly observable that there were multiple data points that were statistically significant outliers. To further evaluate the data (attached) we "stacked" the totals for each month and identified the most outlying of the 3 data points for each month. We then calculated the degree to which that data was an outlier by calculating the percentage difference between the outlier data point and the average of the other two data points. In the case of the Clubhouse Meter which is the primary driver of usage, there were 9 months in which the outlier data point varied by more than 25% from the other two data points and in 6 of those 9 months the outlier data point was higher. While this level of broad inconsistency is alone sufficient to draw the accuracy of individual monthly data into question, the degree to which individual monthly readings are un-reliable is further illustrated by additional observations:

- The two highest monthly totals in the entire 36-month data set (12/'24 & 1/'25) are in two of the slowest traffic months of the calendar year.
- Totals from March, April & May are consistently less than those from January & February when traffic is markedly higher in the spring vs. winter.
- The average of the 5 highest monthly amounts is 360,240 or 249% greater than the remaining 31 months average of 144,497.

While we still believe utilizing HVUD's data remains the best methodology for establishing daily guests on site and ERUs, we cannot, given the degree of unreliability associated with individual monthly data, agree that any particular 12-month period is suitably accurate and reliable considering the gravity of its intended use. Given this landscape, we are seeking resolution via a two-fold approach. First, we have restated the available data and calculated a "provisional" ERU estimate for an initial resetting of the Old Natchez ERUs. Second, we will work with HVUD to audit and correct the metering process and establish accurate data which can be used to calculate a "corrected" ERU estimate for ongoing rate design purposes and, to "true-up", billings based on the "provisional" ERU estimate.

To restate the available data, we made adjustments to reduce the impact of outlier data and calculate a "restated" total for each month. In the attached [OLD NATCHEZ – calculation.revised] the outlier data for each month is shaded yellow, the first row below the monthly data is the percentage variance of that month's outlier data and the second row below the monthly data is the restated total for each month calculated as follows. For months with outlier data points that varied by 25+% from the average of the other two data points (shaded pink), we discarded the outlier data and calculated the average of the remaining two data points as the monthly restated total. For months with data points varying less than 25% from the average of the other two data points (shaded green), we calculated the average of the three data points as the monthly restated total. The 12-month sum of the monthly restated amounts results in a restated annual waste water estimate and ERU of 2,076,482 and 19 respectively. To resolve errors in the metering process and enable calculation of a corrected ERU estimate, we will immediately initiate a review directly with HVUD, and as necessary, retain a specialist third party.

We appreciate the ongoing attention to this matter and look forward to continuing to work within the framework of Limestone's discretion to review ERU calculations, and TPUC's complaint protocols, to adopt the presented "provisional" ERU calculations and work quickly to establish "corrected" ERU calculations.

Please confirm your receipt of this email, and the data as presently revised and the plans presented for further revising the data.

Of course, feel free to let me know if you need to schedule a call to discuss any aspect of this matter.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 23, 2025 3:27 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to follow up here to see if you were comfortable with the ERU reassignment. If so, I can get your credit issued, your fees waived, and the monthly billing corrected going forward.

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: Thursday, September 18, 2025 11:42 AM

To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As you are requesting an update to the "Design Basis" portion of the ERU calculation (guest count), there is no basis for using the test period. We are simply trying to come up with a replacement to the 250 guests used in the calculation and the most recent verifiable data (in this case, the information received from HVUD) is the most accurate way to do this.

While we cannot verify the 90% & 95% adjustors, I am willing to take your work and apply those adjustors.

In the reattached document, the calculations show a total guest count approximation of 83 guests. By replacing the 250 design basis with 83, the new ERU calculation would be 27 as opposed to the current 83. This reduction of 56 ERUs would result in a monthly bill reduction of approximately $9,461.76. If you are comfortable with these calculations, I'll get the credit issued, late fees waived, and ERUs adjusted for the go-foward basis.

Please also note that you'll have an opportunity to provide updated information (if you so choose) prior to the 2026 Phase 2 implementation.

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, September 18, 2025 11:12 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

What is the rationale behind switching to most current trailing 12 vs. the 12 months that overlays with the test period used in the rate design?

Meter 210668 is clubhouse and has a 90% adjustor because we use the HVUD water for the daily washing our golf cart fleet, daily washing of our outdoor dining patios/balconies, and use it at times for supplemental irrigation.

Meter 210834 is golf course maintenance shop and has a 95% adjustor because we use the HVUD water for daily filling of water coolers for customers and staff, and washing equipment.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 18, 2025 9:27 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to confirm that HVUD got back to me and sent me the attached data. Please give me a quick reminder on the 90% and the 95% adjustors added to the clubhouse and the maintenance building. I understand that the Front Clubhouse is irrigation only, but I'm struggling to remember what the adjustors are for on the other items.

Once I get confirmation there, I will add those adjustors to the spreadsheet attached and we can get this resolved.

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: Friday, September 12, 2025 1:42 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As soon as HVUD gets back with me, I will provide you with a timeline for the issuance of credits. Additionally, I will pass along your information regarding the possibility effluent discharge / feedback.

Thanks and have a great weekend!

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: Friday, September 12, 2025 1:19 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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 OId 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

Outlook

Re: OLD NATCHEZ CC - cartwright creek review #confirm.receipt

From Aaron Silas <asilas@cswrgroup.com>
Date Tue 7/29/2025 11:15 AM
To Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc Carlos.Black@tn.gov <Carlos.Black@tn.gov>

Mr. Taylor,

Thank you for following up. Confirming receipt of this email and I'll work to get you a full response by EOD tomorrow (7/30/2025).

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, July 29, 2025 11:02 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos.Black@tn.gov <Carlos.Black@tn.gov>
Subject: FW: OLD NATCHEZ CC - cartwright creek review #confirm.receipt

Aaron –
Can you please confirm receipt of this email from 7/25/25.
Best Regards,
Glynn Taylor

From: Glynn Taylor
Sent: Friday, July 25, 2025 6:14 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 Limestones 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,

CSWR
Central States Water Resources

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,

CSWR Central States Water Resources

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

Outlook

OLD NATCHEZ - confirmations

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Fri 9/26/2025 12:13 PM
To Aaron Silas <asilas@cswrgroup.com>

Mr. Silas –

We are disappointed that Limestone is unwilling to provisionally restate the HVUD data in consideration of the obvious outliers it contained. However, we will accept this email as confirmation that Limestone will cause the following to be reflected on our upcoming 10/1/25 Statement:

- ERU's of 27 and monthly billing amount of $4,561.92.
- Credits of $9,461.76 per month partially offsetting charges previously billed at 6/3/25, 7/2/25, 8/1/25 & 9/2/25 – totaling $37,847.04
- Credits of $700.62, $701.18 & $701.18 fully offsetting penalties charged at 7/2/25, 8/1/25 & 9/2/25 – totaling $2,102.98

Upon receipt of the 10/1/25 Invoice reflecting all the above, Old Natchez will promptly pay the full balance of the account.

Additionally, as Limestone has set forth that this ERU count has been based on "the most recent 12 months of data obtained directly from HVUD", can you advise if this ERU count will be subject to revision if HVUD directly provides Limestone with revised usage data for the same subject months of 7/24 through 8/25?

Lastly, can you please provide the latest update of the timeline for implementing Phase 2 of the rate design as well as any update on how the rate structure may evolve in Phase 2.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 26, 2025 9:11 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Thank you for your follow-up and the revised spreadsheet.

While I do appreciate your analysis, Limestone will not be adopting any form of statistical outlier analysis or multi-year averaging to restate water usage. As previously communicated and as you requested, we have agreed to utilize 12 months of water data to approximate Old Natchez's daily guest count. Limestone is using the most recent 12 months of data obtained directly from HVUD.

Based on this dataset, we are adjusting Old Natchez Country Club's ERU assignment from **83 to 27**, resulting in:

- A credit of approximately **$37,847.04**
- Removal of late payment penalties totaling **$2,102.98**

This revised ERU count will apply going forward.

If you believe further action is necessary, you are of course free to pursue a formal complaint with the Tennessee Public Utility Commission. Limestone will be prepared to respond accordingly through the appropriate regulatory channels.

Please note that this means your current outstanding balance is approximately $18,247.65 which includes amounts that are 90+ days overdue.

Thank you for your cooperation as we worked to update your ERU count.

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: Friday, September 26, 2025 12:24 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ - calculations.revised

Mr. Silas –

Please confirm that you have received and read this email.

Attached see the unlocked Excel file per your request, the review of which will confirm what we strongly believe is already evident, that Limestone should accept the methodology and the ERUs it yields without further delay.

In reviewing calculations while drafting this email three errors were identified and corrected, that in the aggregate reduced the restated ERUs to 18 from 19. Also, please note that the "Outlier Variance" row for each meter has been updated to display the variance between outlier data and the average of the 2 remaining data points as a magnitude rather than a percentage because I frequently reference this variance in this manner. The calculation is simply dividing the outlying data point by the average of the two remaining data points in instances where the outlying data point is greater than the average of the remaining data, and the inverse, when the average remaining data is greater than the outlying data. The result is an expression of the degree to which outlying data varies from the rest of the set irrespective of whether the outlying data is less than or greater than the remaining data.

I am available for a call to discuss the methodologies used to identify variances and provisionally restate data, which I will elaborate further upon below. However, I ask that any such call be scheduled no later than end of business Monday 9/29. Our sense is that this matter could have already been resolved, and further use of our time and effort will be most productively directed at completing and filing the formal complaint with TPUC that we temporarily set aside to work directly with Limestone. We believe with more certainty than ever that we have an especially compelling case, that the Consumer Advocate's office will buttress and expand upon our complaint, and that the Commission will conclude that our rate should be adjusted and that the broader commercial rate design should be reviewed.

First, in regards to Limestone's expressed doubts regarding the appropriateness of provisionally restating the HVUD data. From inception to the present moment the aim of this exercise has been to arrive at an accurate assignment of ERUs for Old Natchez. From our first correspondence with Limestone and TPUC our simple premise has been that Limestone's initial assignment of ERUs for Old Natchez was not accurate, and that whatever steps were necessary for arriving at an accurate assignment should be undertaken. Old Natchez has extended considerable time and effort to identify not only multiple sources of inaccuracy, but to provide logical executable solutions to those inaccuracies. Old Natchez identified the inaccuracy inherent in Limestone's methodology of extrapolating from a list of our physical facilities to an arbitrary daily guest count of 250, a 3X+ inaccuracy. Old Natchez identified the inaccuracy inherent in Limestone's assignment of ERUs at multiple other facilities, also in magnitudes of 3X+. Old Natchez identified that systemic inaccuracies in the assignment of individual facility ERUs causes the aggregate quantity of ERUs to be inaccurate, which causes the rates per ERU to be inaccurate. Old Natchez identified that TPUC commissioners and staff have an inaccurate comprehension of how Limestone assigned ERUs because Limestone's methodology of identifying guest counts or other "second variables", was never presented to TPUC commissioners or staff despite its central necessity in calculating wastewater flows and Limestone's presenting detailed information regarding the "first variables" in its calculations. It is the acknowledgment of this collective inaccuracy that has us brought us to the present point of utilizing HVUD data. Given that the objective of the entire complaint process is to replace inaccurate methods and data with accurate methods and data, we assert that it is <u>unquestionably appropriate</u> given the prima facie evidence of potential inaccuracy within the HVUD data, to provisionally restate it until it can be audited and corrected, and we can fathom no reason that Limestone, TPUC or the Consumer Advocate would reach a different conclusion.

Old Natchez disagrees with Limestone's declaration that the HVUD data set it utilized has been "verified". Specifically, we posit that for any data to be "verified" in a practical sense it must be reasonably precise in measuring what it is intended to measure, in this case wastewater flows. It is an unquestioned reality that water meter performance can be a source of inaccurate data, that protocols for collecting and reporting meter data can be a source of inaccurate data, that almost any large data set will contain inaccurate data and that given its 30,000+ customers HVUD has a large dataset. To declare, at this juncture, HVUD's dataset to be "verified" is to willfully disregard both the general reality of inaccuracy in data collection and the specific inaccuracies in the HVUD data set that Old Natchez has identified and quantified.

Old Natchez rejects Limestone's characterization of Old Natchez's methodology for identifying inaccuracy within, and provisionally restating the HVUD data, as being reliant on "subjective criteria for identifying outliers", as our entire approach is based on a decidedly non-subjective logic flow and careful objective calculations which are presented below. Please note that the discussion herein references data from the Clubhouse meter, as due to its volume, it is the driver of the overall calculation.

Our methodology began with the question “were there any changes in our operations over the 24-month period spanning each month’s set of 3 data points that would cause meaningful variances in our water consumption”. The answer to this question is “No”, as our operational footprint and practices did not change and our population of Members varied less than 2% over the period.

Next, we asked the question “are variances, consistent with inaccuracies, identifiable in the dataset”. To answer this question, we assembled the 12-month by 3-year grid of monthly data and calculated the variance from the most outlying data point in each month from the average of the two remaining data points. Data points with significant variances were immediately identifiable both at a prima facie and statistical level. Two months had variances of 3X+, three months had variances of 2X+, and 3 months had variances of 1.25X+ – establishing statistically, <u>not subjectively</u>, that variances at a level consistent with inaccuracies were present. Two months in which the meter began to fail and then failed, were disregarded for this evaluation as the data produced was so skewed as to be unusable.

Next, we asked the question “how can the data be restated to neutralize the impact of outlying data points”. To answer this question, we made month-by-month calculations of the variability of the two non-outlying data points from one another, and compared this to the month-by-month variability of the outlying data point from the average of the two remaining data points, to determine whether the remaining data was meaningfully less variable than the outlier data and therefore could be used as a more accurate alternative for restating the data. The remaining data was much more internally consistent, varying less than 5% in 8 of 12 months, and on average varied only 20% vs the outlier data which on average varied over 100% even after the aforementioned months impacted by the failing meter we disregarded. We then established a 1.25X variance in the outlier data as the threshold for using the average of the remaining data as the restated data point, because it far exceeded the expected de minimis variance given the previously referenced lack of change in Old Natchez’s operations and membership levels, and because there was an observable “break” in the data for months with variances less than 2X, with 3 of 5 falling at 1.26X or above. For the two months in which outlier data varied by less than 1.25X we used an average of all 3 years data. To further refute the notion that the restated data was subjectively chosen or manipulated to reduce the aggregate restated data, we performed an additional restatement using 1.5X as the threshold for discarding outlier data and used the most recent years data rather than any averaged data for the months with variances below 1.5x. This additional restatement produced an aggregate restated data <u>that was less</u> than the first restatement, but only by 4,350 gallons which did not impact the final ERU calculation.

We look forward to your timely reply.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 25, 2025 9:07 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Confirming receipt of your email. Give me a few days to look into what you've provided below. From first glance, I'm not sure I agree that it is appropriate to override the most recent and verified 12-month dataset with a selectively "restated" average based on a multi-year reconstruction and internal filtering methodology. The process you've outlined — while well-intentioned — relies on subjective criteria for identifying outliers.

If you're willing to provide me with the excel workbook associated with your calculations, I'd be happy to review further and let you know if your methodology is acceptable to the Company.

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, September 24, 2025 4:28 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - calculations.revised

Mr. Silas –

Sorry for lag in providing feedback. Needed to gather expanded data from HVUD and was out of office for a couple days.

Please reference the below discussion and the attached as explanation of a "restatement" from our previous submission of items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities as follows:

- Daily "guests on site" = 57 …*increased from 41*
- ERUs = 19 …*increased from 14*
- Monthly Billing Amount Retroactive to May 2025 = $3,210.24 …*increased from $2,365.44*

Upon your presentation of HVUD data for the period 8/25>7/24, it was immediately evident the total for that period was 200+% greater than the total for the period 5/24>6/23 submitted by Old Natchez. As there was no substantive change in operations across the two periods, an increase of such magnitude warrants additional due diligence to validate the accuracy of the data given its central role in correctly re-calculating ERUs for Old Natchez.

As we assembled 3 trailing years of HVUD meter data for each month beginning with August 2025, it was instantly observable that there were multiple data points that were statistically significant outliers. To further evaluate the data (attached) we "stacked" the totals for each month and identified the most outlying of the 3 data points for each month. We then calculated the degree to which that data was an outlier by calculating the percentage difference between the outlier data point and the average of the other two data points. In the case of the Clubhouse Meter which is the primary driver of usage, there were 9 months in which the outlier data point varied by more than 25% from the other two data points and in 6 of those 9 months the outlier data point was higher. While this level of broad inconsistency is alone sufficient to draw the accuracy of individual monthly data into question, the degree to which individual monthly readings are un-reliable is further illustrated by additional observations:

- The two highest monthly totals in the entire 36-month data set (12/'24 & 1/'25) are in two of the slowest traffic months of the calendar year.
- Totals from March, April & May are consistently less than those from January & February when traffic is markedly higher in the spring vs. winter.
- The average of the 5 highest monthly amounts is 360,240 or 249% greater than the remaining 31 months average of 144,497.

While we still believe utilizing HVUD's data remains the best methodology for establishing daily guests on site and ERUs, we cannot, given the degree of unreliability associated with individual monthly data, agree that any

particular 12-month period is suitably accurate and reliable considering the gravity of its intended use. Given this landscape, we are seeking resolution via a two-fold approach. First, we have restated the available data and calculated a "provisional" ERU estimate for an initial resetting of the Old Natchez ERUs. Second, we will work with HVUD to audit and correct the metering process and establish accurate data which can be used to calculate a "corrected" ERU estimate for ongoing rate design purposes and, to "true-up", billings based on the "provisional" ERU estimate.

To restate the available data, we made adjustments to reduce the impact of outlier data and calculate a "restated" total for each month. In the attached [OLD NATCHEZ – calculation.revised] the outlier data for each month is shaded yellow, the first row below the monthly data is the percentage variance of that month's outlier data and the second row below the monthly data is the restated total for each month calculated as follows. For months with outlier data points that varied by 25+% from the average of the other two data points (shaded pink), we discarded the outlier data and calculated the average of the remaining two data points as the monthly restated total. For months with data points varying less than 25% from the average of the other two data points (shaded green), we calculated the average of the three data points as the monthly restated total. The 12-month sum of the monthly restated amounts results in a restated annual waste water estimate and ERU of 2,076,482 and 19 respectively. To resolve errors in the metering process and enable calculation of a corrected ERU estimate, we will immediately initiate a review directly with HVUD, and as necessary, retain a specialist third party.

We appreciate the ongoing attention to this matter and look forward to continuing to work within the framework of Limestone's discretion to review ERU calculations, and TPUC's complaint protocols, to adopt the presented "provisional" ERU calculations and work quickly to establish "corrected" ERU calculations.

Please confirm your receipt of this email, and the data as presently revised and the plans presented for further revising the data.

Of course, feel free to let me know if you need to schedule a call to discuss any aspect of this matter.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 23, 2025 3:27 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to follow up here to see if you were comfortable with the ERU reassignment. If so, I can get your credit issued, your fees waived, and the monthly billing corrected going forward.

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: Thursday, September 18, 2025 11:42 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As you are requesting an update to the "Design Basis" portion of the ERU calculation (guest count), there is no basis for using the test period. We are simply trying to come up with a replacement to the 250 guests used in the calculation and the most recent verifiable data (in this case, the information received from HVUD) is the most accurate way to do this.

While we cannot verify the 90% & 95% adjustors, I am willing to take your work and apply those adjustors.

In the reattached document, the calculations show a total guest count approximation of 83 guests. By replacing the 250 design basis with 83, the new ERU calculation would be 27 as opposed to the current 83. This reduction of 56 ERUs would result in a monthly bill reduction of approximately $9,461.76. If you are comfortable with these calculations, I'll get the credit issued, late fees waived, and ERUs adjusted for the go-foward basis.

Please also note that you'll have an opportunity to provide updated information (if you so choose) prior to the 2026 Phase 2 implementation.

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, September 18, 2025 11:12 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

What is the rationale behind switching to most current trailing 12 vs. the 12 months that overlays with the test period used in the rate design?

Meter 210668 is clubhouse and has a 90% adjustor because we use the HVUD water for the daily washing our golf cart fleet, daily washing of our outdoor dining patios/balconies, and use it at times for supplemental irrigation.

Meter 210834 is golf course maintenance shop and has a 95% adjustor because we use the HVUD water for daily filling of water coolers for customers and staff, and washing equipment.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 18, 2025 9:27 AM

To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to confirm that HVUD got back to me and sent me the attached data. Please give me a quick reminder on the 90% and the 95% adjustors added to the clubhouse and the maintenance building. I understand that the Front Clubhouse is irrigation only, but I'm struggling to remember what the adjustors are for on the other items.

Once I get confirmation there, I will add those adjustors to the spreadsheet attached and we can get this resolved.

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: Friday, September 12, 2025 1:42 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As soon as HVUD gets back with me, I will provide you with a timeline for the issuance of credits. Additionally, I will pass along your information regarding the possibility effluent discharge / feedback.

Thanks and have a great weekend!

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: Friday, September 12, 2025 1:19 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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 OId 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

Outlook

OLD NATCHEZ - follow-up.10.8.25

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Wed 10/8/2025 11:16 AM
To Aaron Silas <asilas@cswrgroup.com>

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

Outlook

OLD NATCHEZ - go forward clarifications

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Fri 9/26/2025 7:43 PM
To Aaron Silas <asilas@cswrgroup.com>

1 attachment (107 KB)
HVUD - historical.pdf;

Mr. Silas –

Upon reflection we have some additional thoughts and questions about the "going forward" aspects of calculating ERUs generally and the use of HVUD data specifically, as we think it is in the interest of Limestone and Old Natchez to have not only accurate data, but a process that anticipates and functions equitably when HVUD data may not be accurate, which is the point we have been trying to address through our request to restate the current data.

Can you confirm that Limestone's position, as set forth in today's correspondence, regarding the utilization of HVUD data, is as follows:

- The data set will be the most recent trailing 12 months.
- The data set will not be recollected or recalculated at intervals more frequent than every 6 months.
- The data set will be accepted strictly "as received from HVUD without review or restatement".

Can you advise if Limestone believes it has been granted authority, in TPUC's 7/10/25 Order Setting Utility Rates, or elsewhere, to be the sole determinant of data sources, data validity, methodologies, intervals of recalculation and other matters pertinent to the collection of data for establishing the "second variable" in calculating ERUs? If so, can you please provide reference to such?

In regards to the calculation of wastewater flows at Old Natchez, both Limestone and Old Natchez received data directly from HVUD (attached). Old Natchez provided a data set spanning 6/23 > 5/24 because it overlayed the test period in the Order. Limestone rejected this data set and provided a data set spanning 9/24 > 8/25 because it was the most recent, and has taken the position that it will not restate the dataset, even on a provisional basis, for outliers in the data. The 6/23 > 5/24 data set provided by Old Natchez, had two obvious underuse outliers at July '23 / 17,300 gallons; and August '23 / 100 gallons. Is Limestone committing that "as received from HVUD without review or restatement" is the standard that will be applied to
a subsequent data set provided by HVUD that contains similar underuse outliers? Alternatively, if Limestone is not committing to accepting a subsequent data set provided by HVUD that contains underuse outliers, what explanation would Limestone offer for restating underuse outliers in the future but not restating overuse outliers in the present?

Given that outliers in the HVUD data are a near certainty, why does Limestone believe that the most recent 12 months trailing data "as received from HVUD without review or restatement" will produce more accurate estimates of wastewater flows than an expanded multi-year data set and/or subjecting any data set to restatement for outliers?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 26, 2025 12:21 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - confirmations

Mr. Taylor,

I have requested that the below changes be made asap in order to be applied to the upcoming October billing statement. My hope is that those changes are reflected, but there is a small chance that the changes will not be reflected until the November statement. If that is the case, obviously the credits will be slightly larger due to the additional month.

As we continue forward, I am willing to receive information from HVUD once every 6 months to verify that the daily guest count approximation is accurate. I highly suggest implementing a system where you can track and provide the daily amount of guests who check in for an even more accurate ERU assignment.

Limestone is required to submit Phase 2 rate design in March of 2026. At this time, we have no further updates on how the rate structure may evolve.

Thanks and have a great weekend!

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: Friday, September 26, 2025 12:12 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - confirmations

Mr. Silas –

We are disappointed that Limestone is unwilling to provisionally restate the HVUD data in consideration of the obvious outliers it contained. However, we will accept this email as confirmation that Limestone will cause the following to be reflected on our upcoming 10/1/25 Statement:

- ERU's of 27 and monthly billing amount of $4,561.92.
- Credits of $9,461.76 per month partially offsetting charges previously billed at 6/3/25, 7/2/25, 8/1/25 & 9/2/25 – totaling $37,847.04
- Credits of $700.62, $701.18 & $701.18 fully offsetting penalties charged at 7/2/25, 8/1/25 & 9/2/25 – totaling $2,102.98

Upon receipt of the 10/1/25 Invoice reflecting all the above, Old Natchez will promptly pay the full balance of the account.

Additionally, as Limestone has set forth that this ERU count has been based on "the most recent 12 months of data obtained directly from HVUD", can you advise if this ERU count will be subject to revision if HVUD directly provides Limestone with revised usage data for the same subject months of 7/24 through 8/25?

Lastly, can you please provide the latest update of the timeline for implementing Phase 2 of the rate design as well as any update on how the rate structure may evolve in Phase 2.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 26, 2025 9:11 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Thank you for your follow-up and the revised spreadsheet.

While I do appreciate your analysis, Limestone will not be adopting any form of statistical outlier analysis or multi-year averaging to restate water usage. As previously communicated and as you requested, we have agreed to utilize 12 months of water data to approximate Old Natchez's daily guest count. Limestone is using the most recent 12 months of data obtained directly from HVUD.

Based on this dataset, we are adjusting Old Natchez Country Club's ERU assignment from **83 to 27**, resulting in:

- A credit of approximately **$37,847.04**
- Removal of late payment penalties totaling **$2,102.98**

This revised ERU count will apply going forward.

If you believe further action is necessary, you are of course free to pursue a formal complaint with the Tennessee Public Utility Commission. Limestone will be prepared to respond accordingly through the appropriate regulatory channels.

Please note that this means your current outstanding balance is approximately $18,247.65 which includes amounts that are 90+ days overdue.

Thank you for your cooperation as we worked to update your ERU count.

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: Friday, September 26, 2025 12:24 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ - calculations.revised

Mr. Silas –

Please confirm that you have received and read this email.

Attached see the unlocked Excel file per your request, the review of which will confirm what we strongly believe is already evident, that Limestone should accept the methodology and the ERUs it yields without further delay.

In reviewing calculations while drafting this email three errors were identified and corrected, that in the aggregate reduced the restated ERUs to 18 from 19. Also, please note that the "Outlier Variance" row for each meter has been updated to display the variance between outlier data and the average of the 2 remaining data points as a magnitude rather than a percentage because I frequently reference this variance in this manner. The calculation is simply dividing the outlying data point by the average of the two remaining data points in instances where the outlying data point is greater than the average of the remaining data, and the inverse, when the average remaining data is greater than the outlying data. The result is an expression of the degree to which outlying data varies from the rest of the set irrespective of whether the outlying data is less than or greater than the remaining data.

I am available for a call to discuss the methodologies used to identify variances and provisionally restate data, which I will elaborate further upon below. However, I ask that any such call be scheduled no later than end of business Monday 9/29. Our sense is that this matter could have already been resolved, and further use of our time and effort will be most productively directed at completing and filing the formal complaint with TPUC that we temporarily set aside to work directly with Limestone. We believe with more certainty than ever that we have an especially compelling case, that the Consumer Advocate's office will buttress and expand upon our complaint, and that the Commission will conclude that our rate should be adjusted and that the broader commercial rate design should be reviewed.

First, in regards to Limestone's expressed doubts regarding the appropriateness of provisionally restating the HVUD data. From inception to the present moment the aim of this exercise has been to arrive at an accurate assignment of ERUs for Old Natchez. From our first correspondence with Limestone and TPUC our simple premise has been that Limestone's initial assignment of ERUs for Old Natchez was not accurate, and that whatever steps were necessary for arriving at an accurate assignment should be undertaken. Old Natchez has extended considerable time and effort to identify not only multiple sources of inaccuracy, but to provide logical executable solutions to those inaccuracies. Old Natchez identified the inaccuracy inherent in Limestone's methodology of extrapolating from a list of our physical facilities to an arbitrary daily guest count of 250, a 3X+ inaccuracy. Old Natchez identified the inaccuracy inherent in Limestone's assignment of ERUs at multiple other facilities, also in magnitudes of 3X+. Old Natchez identified that systemic inaccuracies in the assignment of individual facility ERUs causes the aggregate quantity of ERUs to be inaccurate, which causes the rates per ERU to be inaccurate. Old Natchez identified that TPUC commissioners and staff have an inaccurate comprehension of how Limestone assigned ERUs because Limestone's methodology of identifying guest counts or other "second variables", was never presented to TPUC commissioners or staff despite its central necessity in calculating wastewater flows and Limestone's presenting detailed information regarding the "first variables" in its calculations. It is the acknowledgment of this collective inaccuracy that has us brought us to the present point of utilizing HVUD data. Given that the objective of the entire complaint process is to replace inaccurate methods and data with accurate methods and data, we assert that it is <u>unquestionably appropriate</u> given the prima facie evidence of potential

inaccuracy within the HVUD data, to provisionally restate it until it can be audited and corrected, and we can fathom no reason that Limestone, TPUC or the Consumer Advocate would reach a different conclusion.

Old Natchez disagrees with Limestone's declaration that the HVUD data set it utilized has been "verified". Specifically, we posit that for any data to be "verified" in a practical sense it must be reasonably precise in measuring what it is intended to measure, in this case wastewater flows. It is an unquestioned reality that water meter performance can be a source of inaccurate data, that protocols for collecting and reporting meter data can be a source of inaccurate data, that almost any large data set will contain inaccurate data and that given its 30,000+ customers HVUD has a large dataset. To declare, at this juncture, HVUD's dataset to be "verified" is to willfully disregard both the general reality of inaccuracy in data collection and the specific inaccuracies in the HVUD data set that Old Natchez has identified and quantified.

Old Natchez rejects Limestone's characterization of Old Natchez's methodology for identifying inaccuracy within, and provisionally restating the HVUD data, as being reliant on "subjective criteria for identifying outliers", as our entire approach is based on a decidedly non-subjective logic flow and careful objective calculations which are presented below. Please note that the discussion herein references data from the Clubhouse meter, as due to its volume, it is the driver of the overall calculation.

Our methodology began with the question "were there any changes in our operations over the 24-month period spanning each month's set of 3 data points that would cause meaningful variances in our water consumption". The answer to this question is "No", as our operational footprint and practices did not change and our population of Members varied less than 2% over the period.

Next, we asked the question "are variances, consistent with inaccuracies, identifiable in the dataset". To answer this question, we assembled the 12-month by 3-year grid of monthly data and calculated the variance from the most outlying data point in each month from the average of the two remaining data points. Data points with significant variances were immediately identifiable both at a prima facie and statistical level. Two months had variances of 3X+, three months had variances of 2X+, and 3 months had variances of 1.25X+ – establishing statistically, <u>not subjectively</u>, that variances at a level consistent with inaccuracies were present. Two months in which the meter began to fail and then failed, were disregarded for this evaluation as the data produced was so skewed as to be unusable.

Next, we asked the question "how can the data be restated to neutralize the impact of outlying data points". To answer this question, we made month-by-month calculations of the variability of the two non-outlying data points from one another, and compared this to the month-by-month variability of the outlying data point from the average of the two remaining data points, to determine whether the remaining data was meaningfully less variable than the outlier data and therefore could be used as a more accurate alternative for restating the data. The remaining data was much more internally consistent, varying less than 5% in 8 of 12 months, and on average varied only 20% vs the outlier data which on average varied over 100% even after the aforementioned months impacted by the failing meter we disregarded. We then established a 1.25X variance in the outlier data as the threshold for using the average of the remaining data as the restated data point, because it far exceeded the

expected de minimis variance given the previously referenced lack of change in Old Natchez's operations and membership levels, and because there was an observable "break" in the data for months with variances less than 2X, with 3 of 5 falling at 1.26X or above. For the two months in which outlier data varied by less than 1.25X we used an average of all 3 years data. To further refute the notion that the restated data was subjectively chosen or manipulated to reduce the aggregate restated data, we performed an additional restatement using 1.5X as the threshold for discarding outlier data and used the most recent years data rather than any averaged data for the months with variances below 1.5x. This additional restatement produced an aggregate restated data that was less than the first restatement, but only by 4,350 gallons which did not impact the final ERU calculation.

We look forward to your timely reply.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 25, 2025 9:07 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Confirming receipt of your email. Give me a few days to look into what you've provided below. From first glance, I'm not sure I agree that it is appropriate to override the most recent and verified 12-month dataset with a selectively "restated" average based on a multi-year reconstruction and internal filtering methodology. The process you've outlined — while well-intentioned — relies on subjective criteria for identifying outliers.

If you're willing to provide me with the excel workbook associated with your calculations, I'd be happy to review further and let you know if your methodology is acceptable to the Company.

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, September 24, 2025 4:28 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - calculations.revised

Mr. Silas –

Sorry for lag in providing feedback. Needed to gather expanded data from HVUD and was out of office for a couple days.

Please reference the below discussion and the attached as explanation of a "restatement" from our previous submission of items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities as follows:

- Daily "guests on site" = 57 …*increased from 41*
- ERUs = 19 …*increased from 14*
- Monthly Billing Amount Retroactive to May 2025 = $3,210.24 …*increased from $2,365.44*

Upon your presentation of HVUD data for the period 8/25>7/24, it was immediately evident the total for that period was 200+% greater than the total for the period 5/24>6/23 submitted by Old Natchez. As there was no substantive change in operations across the two periods, an increase of such magnitude warrants additional due diligence to validate the accuracy of the data given its central role in correctly re-calculating ERUs for Old Natchez.

As we assembled 3 trailing years of HVUD meter data for each month beginning with August 2025, it was instantly observable that there were multiple data points that were statistically significant outliers. To further evaluate the data (attached) we "stacked" the totals for each month and identified the most outlying of the 3 data points for each month. We then calculated the degree to which that data was an outlier by calculating the percentage

difference between the outlier data point and the average of the other two data points. In the case of the Clubhouse Meter which is the primary driver of usage, there were 9 months in which the outlier data point varied by more than 25% from the other two data points and in 6 of those 9 months the outlier data point was higher. While this level of broad inconsistency is alone sufficient to draw the accuracy of individual monthly data into question, the degree to which individual monthly readings are un-reliable is further illustrated by additional observations:

- The two highest monthly totals in the entire 36-month data set (12/'24 & 1/'25) are in two of the slowest traffic months of the calendar year.
- Totals from March, April & May are consistently less than those from January & February when traffic is markedly higher in the spring vs. winter.
- The average of the 5 highest monthly amounts is 360,240 or 249% greater than the remaining 31 months average of 144,497.

While we still believe utilizing HVUD's data remains the best methodology for establishing daily guests on site and ERUs, we cannot, given the degree of unreliability associated with individual monthly data, agree that any particular 12-month period is suitably accurate and reliable considering the gravity of its intended use. Given this landscape, we are seeking resolution via a two-fold approach. First, we have restated the available data and calculated a "provisional" ERU estimate for an initial resetting of the Old Natchez ERUs. Second, we will work with HVUD to audit and correct the metering process and establish accurate data which can be used to calculate a "corrected" ERU estimate for ongoing rate design purposes and, to "true-up", billings based on the "provisional" ERU estimate.

To restate the available data, we made adjustments to reduce the impact of outlier data and calculate a "restated" total for each month. In the attached [OLD NATCHEZ – calculation.revised] the outlier data for each month is shaded yellow, the first row below the monthly data is the percentage variance of that month's outlier data and the second row below the monthly data is the restated total for each month calculated as follows. For months with outlier data points that varied by 25+% from the average of the other two data points (shaded pink), we discarded the outlier data and calculated the average of the remaining two data points as the monthly restated total. For months with data points varying less than 25% from the average of the other two data points (shaded green), we calculated the average of the three data points as the monthly restated total. The 12-month sum of the monthly restated amounts results in a restated annual waste water estimate and ERU of 2,076,482 and 19 respectively. To resolve errors in the metering process and enable calculation of a corrected ERU estimate, we will immediately initiate a review directly with HVUD, and as necessary, retain a specialist third party.

We appreciate the ongoing attention to this matter and look forward to continuing to work within the framework of Limestone's discretion to review ERU calculations, and TPUC's complaint protocols, to adopt the presented "provisional" ERU calculations and work quickly to establish "corrected" ERU calculations.

Please confirm your receipt of this email, and the data as presently revised and the plans presented for further revising the data.

Of course, feel free to let me know if you need to schedule a call to discuss any aspect of this matter.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 23, 2025 3:27 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to follow up here to see if you were comfortable with the ERU reassignment. If so, I can get your credit issued, your fees waived, and the monthly billing corrected going forward.

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: Thursday, September 18, 2025 11:42 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As you are requesting an update to the "Design Basis" portion of the ERU calculation (guest count), there is no basis for using the test period. We are simply trying to come up with a replacement to the 250 guests used in the calculation and the most recent verifiable data (in this case, the information received from HVUD) is the most accurate way to do this.

While we cannot verify the 90% & 95% adjustors, I am willing to take your work and apply those adjustors.

In the reattached document, the calculations show a total guest count approximation of 83 guests. By replacing the 250 design basis with 83, the new ERU calculation would be 27 as opposed to the current 83. This reduction of 56 ERUs would result in a monthly bill reduction of approximately $9,461.76. If you are comfortable with these calculations, I'll get the credit issued, late fees waived, and ERUs adjusted for the go-foward basis.

Please also note that you'll have an opportunity to provide updated information (if you so choose) prior to the 2026 Phase 2 implementation.

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, September 18, 2025 11:12 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

What is the rationale behind switching to most current trailing 12 vs. the 12 months that overlays with the test period used in the rate design?

Meter 210668 is clubhouse and has a 90% adjustor because we use the HVUD water for the daily washing our golf cart fleet, daily washing of our outdoor dining patios/balconies, and use it at times for supplemental irrigation.

Meter 210834 is golf course maintenance shop and has a 95% adjustor because we use the HVUD water for daily filling of water coolers for customers and staff, and washing equipment.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 18, 2025 9:27 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to confirm that HVUD got back to me and sent me the attached data. Please give me a quick reminder on the 90% and the 95% adjustors added to the clubhouse and the maintenance building. I understand that the Front Clubhouse is irrigation only, but I'm struggling to remember what the adjustors are for on the other items.

Once I get confirmation there, I will add those adjustors to the spreadsheet attached and we can get this resolved.

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: Friday, September 12, 2025 1:42 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As soon as HVUD gets back with me, I will provide you with a timeline for the issuance of credits. Additionally, I will pass along your information regarding the possibility effluent discharge / feedback.

Thanks and have a great weekend!

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: Friday, September 12, 2025 1:19 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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 OId 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

Outlook

OLD NATCHEZ - meter confirmation

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Thu 10/2/2025 4:32 PM
To Aaron Silas <asilas@cswrgroup.com>

2 attachments (836 KB)
OLD NATCHEZ - hvud.#210669.invoices.pdf; LIMESTONE - analysis.9.29.25.xlsx;

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

Outlook

OLD NATCHEZ - revised calculation - incorrect meter

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Mon 9/29/2025 6:07 PM
To Aaron Silas <asilas@cswrgroup.com>

1 attachment (13 KB)
LIMESTONE - analysis.9.29.25.xlsx;

Mr. Silas –

Needed to send you a quick note that I was finally able to connect with a representative of HVUD this afternoon to initiate the process of looking into the variances in readings from our meters.

As part of that conversation, we established that the meter identified in their records and our billing statements as CLUB HOUSE which we have used in our analysis for the Clubhouse to determine wastewater flows is actually the meter that serves the Pool, and the meter identified in their records and our billing statements as FRONT - CLUB HOUSE is actually the Clubhouse and is the correct one to use in our wastewater calculations.

I have attached a wastewater and ERU recalculation that results in the ERUs at **20** rather than 27 based on utilizing the correct data.

HVUD will also have a technician visiting our location this week and we will review the identification with them to establish 100% which meter in their billing system corresponds to the meter that actually serves the clubhouse. In the conversation today we identified each by way of the serial number of each meter because the meters themselves do not have any identifiers that correlate with the descriptions or account numbers in their billing system.

You can get the billing data from HVUD to validate the attached spreadsheet by asking for account 210669 – 110788.

I am traveling in the morning and early evening tomorrow but other than being on a plane at those times am available for a call also.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, September 29, 2025 11:20 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - go forward clarifications

Mr. Taylor,

Please note that Limestone is accommodating your request by utilizing HVUD water usage data to approximate guest count. At the time of that request, we elected to use the most recent 12 months of complete data, as this best reflects current operations, including potential changes in membership levels, facility usage, and seasonal patterns. Using a three-year dataset risks underestimating present-day demand.

Limestone may consider updated data on a semi-annual basis (no more frequently than every 6 months), particularly if there are material changes to facility operations. And yes — we will continue to use HVUD data as received, without restatement or outlier removal. If HVUD provides revised or corrected data in the future, we will review it accordingly.

Limestone has the authority to use design standards, including TDEC methodologies, to assign ERUs. We will continue to use the best available data to determine what you've referred to as the "second variable" in the ERU calculation — whether that's guest count, seat count, or other design-basis flow factors.

To be clear: Limestone applies this approach consistently. We do not selectively adjust or discard high or low months. If the data is complete and provided by HVUD, it is used as-is — for all commercial customers.

Lastly, we again encourage Old Natchez to consider implementing a sign-in or check-in system to establish a true daily guest count. We would gladly use that direct data, rather than rely on approximations via water usage, if made available.

At this time, we are moving forward with the ERU assignment of 27.

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: Friday, September 26, 2025 7:41 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - go forward clarifications

Mr. Silas –

Upon reflection we have some additional thoughts and questions about the "going forward" aspects of calculating ERUs generally and the use of HVUD data specifically, as we think it is in the interest of Limestone and Old Natchez to have not only accurate data, but a process that anticipates and functions equitably when HVUD data may not be accurate, which is the point we have been trying to address through our request to restate the current data.

Can you confirm that Limestone's position, as set forth in today's correspondence, regarding the utilization of HVUD data, is as follows:

- The data set will be the most recent trailing 12 months.
- The data set will not be recollected or recalculated at intervals more frequent than every 6 months.
- The data set will be accepted strictly "as received from HVUD without review or restatement".

Can you advise if Limestone believes it has been granted authority, in TPUC's 7/10/25 Order Setting Utility Rates, or elsewhere, to be the sole determinant of data sources, data validity, methodologies, intervals of recalculation

and other matters pertinent to the collection of data for establishing the "second variable" in calculating ERUs? If so, can you please provide reference to such?

In regards to the calculation of wastewater flows at Old Natchez, both Limestone and Old Natchez received data directly from HVUD (attached). Old Natchez provided a data set spanning 6/23 > 5/24 because it overlayed the test period in the Order. Limestone rejected this data set and provided a data set spanning 9/24 > 8/25 because it was the most recent, and has taken the position that it will not restate the dataset, even on a provisional basis, for outliers in the data. The 6/23 > 5/24 data set provided by Old Natchez, had two obvious underuse outliers at July '23 / 17,300 gallons; and August '23 / 100 gallons. Is Limestone committing that "as received from HVUD without review or restatement" is the standard that will be applied to
a subsequent data set provided by HVUD that contains similar underuse outliers? Alternatively, if Limestone is not committing to accepting a subsequent data set provided by HVUD that contains underuse outliers, what explanation would Limestone offer for restating underuse outliers in the future but not restating overuse outliers in the present?

Given that outliers in the HVUD data are a near certainty, why does Limestone believe that the most recent 12 months trailing data "as received from HVUD without review or restatement" will produce more accurate estimates of wastewater flows than an expanded multi-year data set and/or subjecting any data set to restatement for outliers?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 26, 2025 12:21 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - confirmations

Mr. Taylor,

I have requested that the below changes be made asap in order to be applied to the upcoming October billing statement. My hope is that those changes are reflected, but there is a small chance that the changes will not be reflected until the November statement. If that is the case, obviously the credits will be slightly larger due to the additional month.

As we continue forward, I am willing to receive information from HVUD once every 6 months to verify that the daily guest count approximation is accurate. I highly suggest implementing a system where you can track and provide the daily amount of guests who check in for an even more accurate ERU assignment.

Limestone is required to submit Phase 2 rate design in March of 2026. At this time, we have no further updates on how the rate structure may evolve.

Thanks and have a great weekend!

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: Friday, September 26, 2025 12:12 PM

To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - confirmations

Mr. Silas –

We are disappointed that Limestone is unwilling to provisionally restate the HVUD data in consideration of the obvious outliers it contained. However, we will accept this email as confirmation that Limestone will cause the following to be reflected on our upcoming 10/1/25 Statement:

- ERU's of 27 and monthly billing amount of $4,561.92.
- Credits of $9,461.76 per month partially offsetting charges previously billed at 6/3/25, 7/2/25, 8/1/25 & 9/2/25 – totaling $37,847.04
- Credits of $700.62, $701.18 & $701.18 fully offsetting penalties charged at 7/2/25, 8/1/25 & 9/2/25 – totaling $2,102.98

Upon receipt of the 10/1/25 Invoice reflecting all the above, Old Natchez will promptly pay the full balance of the account.

Additionally, as Limestone has set forth that this ERU count has been based on "the most recent 12 months of data obtained directly from HVUD", can you advise if this ERU count will be subject to revision if HVUD directly provides Limestone with revised usage data for the same subject months of 7/24 through 8/25?

Lastly, can you please provide the latest update of the timeline for implementing Phase 2 of the rate design as well as any update on how the rate structure may evolve in Phase 2.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 26, 2025 9:11 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Thank you for your follow-up and the revised spreadsheet.

While I do appreciate your analysis, Limestone will not be adopting any form of statistical outlier analysis or multi-year averaging to restate water usage. As previously communicated and as you requested, we have agreed to utilize 12 months of water data to approximate Old Natchez's daily guest count. Limestone is using the most recent 12 months of data obtained directly from HVUD.

Based on this dataset, we are adjusting Old Natchez Country Club's ERU assignment from **83 to 27**, resulting in:

- A credit of approximately **$37,847.04**
- Removal of late payment penalties totaling **$2,102.98**

This revised ERU count will apply going forward.

If you believe further action is necessary, you are of course free to pursue a formal complaint with the Tennessee Public Utility Commission. Limestone will be prepared to respond accordingly through the appropriate regulatory channels.

Please note that this means your current outstanding balance is approximately $18,247.65 which includes amounts that are 90+ days overdue.

Thank you for your cooperation as we worked to update your ERU count.

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: Friday, September 26, 2025 12:24 AM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Carlos Black <Carlos.Black@tn.gov>
Subject: RE: OLD NATCHEZ - calculations.revised

Mr. Silas –

Please confirm that you have received and read this email.

Attached see the unlocked Excel file per your request, the review of which will confirm what we strongly believe is already evident, that Limestone should accept the methodology and the ERUs it yields without further delay.

In reviewing calculations while drafting this email three errors were identified and corrected, that in the aggregate reduced the restated ERUs to 18 from 19. Also, please note that the "Outlier Variance" row for each meter has been updated to display the variance between outlier data and the average of the 2 remaining data points as a magnitude rather than a percentage because I frequently reference this variance in this manner. The calculation is simply dividing the outlying data point by the average of the two remaining data points in instances where the outlying data point is greater than the average of the remaining data, and the inverse, when the average remaining data is greater than the outlying data. The result is an expression of the degree to which outlying data varies from the rest of the set irrespective of whether the outlying data is less than or greater than the remaining data.

I am available for a call to discuss the methodologies used to identify variances and provisionally restate data, which I will elaborate further upon below. However, I ask that any such call be scheduled no later than end of business Monday 9/29. Our sense is that this matter could have already been resolved, and further use of our time and effort will be most productively directed at completing and filing the formal complaint with TPUC that we temporarily set aside to work directly with Limestone. We believe with more certainty than ever that we have an especially compelling case, that the Consumer Advocate's office will buttress and expand upon our complaint,

and that the Commission will conclude that our rate should be adjusted and that the broader commercial rate design should be reviewed.

First, in regards to Limestone's expressed doubts regarding the appropriateness of provisionally restating the HVUD data. From inception to the present moment the aim of this exercise has been to arrive at an accurate assignment of ERUs for Old Natchez. From our first correspondence with Limestone and TPUC our simple premise has been that Limestone's initial assignment of ERUs for Old Natchez was not accurate, and that whatever steps were necessary for arriving at an accurate assignment should be undertaken. Old Natchez has extended considerable time and effort to identify not only multiple sources of inaccuracy, but to provide logical executable solutions to those inaccuracies. Old Natchez identified the inaccuracy inherent in Limestone's methodology of extrapolating from a list of our physical facilities to an arbitrary daily guest count of 250, a 3X+ inaccuracy. Old Natchez identified the inaccuracy inherent in Limestone's assignment of ERUs at multiple other facilities, also in magnitudes of 3X+. Old Natchez identified that systemic inaccuracies in the assignment of individual facility ERUs causes the aggregate quantity of ERUs to be inaccurate, which causes the rates per ERU to be inaccurate. Old Natchez identified that TPUC commissioners and staff have an inaccurate comprehension of how Limestone assigned ERUs because Limestone's methodology of identifying guest counts or other "second variables", was never presented to TPUC commissioners or staff despite its central necessity in calculating wastewater flows and Limestone's presenting detailed information regarding the "first variables" in its calculations. It is the acknowledgment of this collective inaccuracy that has us brought us to the present point of utilizing HVUD data. Given that the objective of the entire complaint process is to replace inaccurate methods and data with accurate methods and data, we assert that it is <u>unquestionably appropriate</u> given the prima facie evidence of potential inaccuracy within the HVUD data, to provisionally restate it until it can be audited and corrected, and we can fathom no reason that Limestone, TPUC or the Consumer Advocate would reach a different conclusion.

Old Natchez disagrees with Limestone's declaration that the HVUD data set it utilized has been "verified". Specifically, we posit that for any data to be "verified" in a practical sense it must be reasonably precise in measuring what it is intended to measure, in this case wastewater flows. It is an unquestioned reality that water meter performance can be a source of inaccurate data, that protocols for collecting and reporting meter data can be a source of inaccurate data, that almost any large data set will contain inaccurate data and that given its 30,000+ customers HVUD has a large dataset. To declare, at this juncture, HVUD's dataset to be "verified" is to willfully disregard both the general reality of inaccuracy in data collection and the specific inaccuracies in the HVUD data set that Old Natchez has identified and quantified.

Old Natchez rejects Limestone's characterization of Old Natchez's methodology for identifying inaccuracy within, and provisionally restating the HVUD data, as being reliant on "subjective criteria for identifying outliers", as our entire approach is based on a decidedly non-subjective logic flow and careful objective calculations which are presented below. Please note that the discussion herein references data from the Clubhouse meter, as due to its volume, it is the driver of the overall calculation.

Our methodology began with the question "were there any changes in our operations over the 24-month period spanning each month's set of 3 data points that would cause meaningful variances in our water consumption". The answer to this question is "No", as our operational footprint and practices did not change and our population of Members varied less than 2% over the period.

Next, we asked the question "are variances, consistent with inaccuracies, identifiable in the dataset". To answer this question, we assembled the 12-month by 3-year grid of monthly data and calculated the variance from the most outlying data point in each month from the average of the two remaining data points. Data points with significant variances were immediately identifiable both at a prima facie and statistical level. Two months had variances of 3X+, three months had variances of 2X+, and 3 months had variances of 1.25X+ – establishing statistically, <u>not subjectively</u>, that variances at a level consistent with inaccuracies were present. Two months in which the meter began to fail and then failed, were disregarded for this evaluation as the data produced was so skewed as to be unusable.

Next, we asked the question "how can the data be restated to neutralize the impact of outlying data points". To answer this question, we made month-by-month calculations of the variability of the two non-outlying data points from one another, and compared this to the month-by-month variability of the outlying data point from the average of the two remaining data points, to determine whether the remaining data was meaningfully less variable than the outlier data and therefore could be used as a more accurate alternative for restating the data. The remaining data was much more internally consistent, varying less than 5% in 8 of 12 months, and on average varied only 20% vs the outlier data which on average varied over 100% even after the aforementioned months impacted by the failing meter we disregarded. We then established a 1.25X variance in the outlier data as the threshold for using the average of the remaining data as the restated data point, because it far exceeded the expected de minimis variance given the previously referenced lack of change in Old Natchez's operations and membership levels, and because there was an observable "break" in the data for months with variances less than 2X, with 3 of 5 falling at 1.26X or above. For the two months in which outlier data varied by less than 1.25X we used an average of all 3 years data. To further refute the notion that the restated data was subjectively chosen or manipulated to reduce the aggregate restated data, we performed an additional restatement using 1.5X as the threshold for discarding outlier data and used the most recent years data rather than any averaged data for the months with variances below 1.5x. This additional restatement produced an aggregate restated data <u>that was less</u> than the first restatement, but only by 4,350 gallons which did not impact the final ERU calculation.

We look forward to your timely reply.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 25, 2025 9:07 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Confirming receipt of your email. Give me a few days to look into what you've provided below. From first glance, I'm not sure I agree that it is appropriate to override the most recent and verified 12-month dataset with a selectively "restated" average based on a multi-year reconstruction and internal filtering methodology. The process you've outlined — while well-intentioned — relies on subjective criteria for identifying outliers.

If you're willing to provide me with the excel workbook associated with your calculations, I'd be happy to review further and let you know if your methodology is acceptable to the Company.

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, September 24, 2025 4:28 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - calculations.revised

Mr. Silas –

Sorry for lag in providing feedback. Needed to gather expanded data from HVUD and was out of office for a couple days.

Please reference the below discussion and the attached as explanation of a "restatement" from our previous submission of items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities as follows:

- Daily "guests on site" = 57 …*increased from 41*
- ERUs = 19 …*increased from 14*
- Monthly Billing Amount Retroactive to May 2025 = $3,210.24 …*increased from $2,365.44*

Upon your presentation of HVUD data for the period 8/25>7/24, it was immediately evident the total for that period was 200+% greater than the total for the period 5/24>6/23 submitted by Old Natchez. As there was no substantive change in operations across the two periods, an increase of such magnitude warrants additional due diligence to validate the accuracy of the data given its central role in correctly re-calculating ERUs for Old Natchez.

As we assembled 3 trailing years of HVUD meter data for each month beginning with August 2025, it was instantly observable that there were multiple data points that were statistically significant outliers. To further evaluate the data (attached) we "stacked" the totals for each month and identified the most outlying of the 3 data points for each month. We then calculated the degree to which that data was an outlier by calculating the percentage difference between the outlier data point and the average of the other two data points. In the case of the Clubhouse Meter which is the primary driver of usage, there were 9 months in which the outlier data point varied by more than 25% from the other two data points and in 6 of those 9 months the outlier data point was higher. While this level of broad inconsistency is alone sufficient to draw the accuracy of individual monthly data into question, the degree to which individual monthly readings are un-reliable is further illustrated by additional observations:

- The two highest monthly totals in the entire 36-month data set (12/'24 & 1/'25) are in two of the slowest traffic months of the calendar year.
- Totals from March, April & May are consistently less than those from January & February when traffic is markedly higher in the spring vs. winter.
- The average of the 5 highest monthly amounts is 360,240 or 249% greater than the remaining 31 months average of 144,497.

While we still believe utilizing HVUD's data remains the best methodology for establishing daily guests on site and ERUs, we cannot, given the degree of unreliability associated with individual monthly data, agree that any particular 12-month period is suitably accurate and reliable considering the gravity of its intended use. Given this landscape, we are seeking resolution via a two-fold approach. First, we have restated the available data and calculated a "provisional" ERU estimate for an initial resetting of the Old Natchez ERUs. Second, we will work with HVUD to audit and correct the metering process and establish accurate data which can be used to calculate a "corrected" ERU estimate for ongoing rate design purposes and, to "true-up", billings based on the "provisional" ERU estimate.

To restate the available data, we made adjustments to reduce the impact of outlier data and calculate a "restated" total for each month. In the attached [OLD NATCHEZ – calculation.revised] the outlier data for each month is shaded yellow, the first row below the monthly data is the percentage variance of that month's outlier data and the second row below the monthly data is the restated total for each month calculated as follows. For months with outlier data points that varied by 25+% from the average of the other two data points (shaded pink), we discarded the outlier data and calculated the average of the remaining two data points as the monthly restated total. For months with data points varying less than 25% from the average of the other two data points (shaded green), we calculated the average of the three data points as the monthly restated total. The 12-month sum of the monthly restated amounts results in a restated annual waste water estimate and ERU of 2,076,482 and 19 respectively. To resolve errors in the metering process and enable calculation of a corrected ERU estimate, we will immediately initiate a review directly with HVUD, and as necessary, retain a specialist third party.

We appreciate the ongoing attention to this matter and look forward to continuing to work within the framework of Limestone's discretion to review ERU calculations, and TPUC's complaint protocols, to adopt the presented "provisional" ERU calculations and work quickly to establish "corrected" ERU calculations.

Please confirm your receipt of this email, and the data as presently revised and the plans presented for further revising the data.

Of course, feel free to let me know if you need to schedule a call to discuss any aspect of this matter.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 23, 2025 3:27 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to follow up here to see if you were comfortable with the ERU reassignment. If so, I can get your credit issued, your fees waived, and the monthly billing corrected going forward.

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: Thursday, September 18, 2025 11:42 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As you are requesting an update to the "Design Basis" portion of the ERU calculation (guest count), there is no basis for using the test period. We are simply trying to come up with a replacement to the 250 guests used in the calculation and the most recent verifiable data (in this case, the information received from HVUD) is the most accurate way to do this.

While we cannot verify the 90% & 95% adjustors, I am willing to take your work and apply those adjustors.

In the reattached document, the calculations show a total guest count approximation of 83 guests. By replacing the 250 design basis with 83, the new ERU calculation would be 27 as opposed to the current 83. This reduction of 56 ERUs would result in a monthly bill reduction of approximately $9,461.76. If you are comfortable with these calculations, I'll get the credit issued, late fees waived, and ERUs adjusted for the go-foward basis.

Please also note that you'll have an opportunity to provide updated information (if you so choose) prior to the 2026 Phase 2 implementation.

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, September 18, 2025 11:12 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

What is the rationale behind switching to most current trailing 12 vs. the 12 months that overlays with the test period used in the rate design?

Meter 210668 is clubhouse and has a 90% adjustor because we use the HVUD water for the daily washing our golf cart fleet, daily washing of our outdoor dining patios/balconies, and use it at times for supplemental irrigation.

Meter 210834 is golf course maintenance shop and has a 95% adjustor because we use the HVUD water for daily filling of water coolers for customers and staff, and washing equipment.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 18, 2025 9:27 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to confirm that HVUD got back to me and sent me the attached data. Please give me a quick reminder on the 90% and the 95% adjustors added to the clubhouse and the maintenance building. I understand that the Front Clubhouse is irrigation only, but I'm struggling to remember what the adjustors are for on the other items.

Once I get confirmation there, I will add those adjustors to the spreadsheet attached and we can get this resolved.

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: Friday, September 12, 2025 1:42 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As soon as HVUD gets back with me, I will provide you with a timeline for the issuance of credits. Additionally, I will pass along your information regarding the possibility effluent discharge / feedback.

Thanks and have a great weekend!

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: Friday, September 12, 2025 1:19 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,

Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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 OId 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

Outlook

OLD NATCHEZ CC - cartwright creek review #3

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Fri 7/25/2025 6:16 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

1 attachment (93 KB)
TPUC - 7.10.25 p.107.pdf;

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

Outlook

OLD NATCHEZ CC - cartwright creek review #5

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Mon 8/11/2025 10:17 AM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

1 attachment (674 KB)
Limestone Prior Rates.pdf;

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 Limestones 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.

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

Outlook

OLD NATCHEZ CC - cartwright creek review #6

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Mon 8/18/2025 5:25 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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,

CSWR
Central States Water Resources

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

Outlook

RE: OLD NATCHEZ - calculations

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Thu 9/18/2025 11:12 AM
To Aaron Silas <asilas@cswrgroup.com>

Mr. Silas –

What is the rationale behind switching to most current trailing 12 vs. the 12 months that overlays with the test period used in the rate design?

Meter 210668 is clubhouse and has a 90% adjustor because we use the HVUD water for the daily washing our golf cart fleet, daily washing of our outdoor dining patios/balconies, and use it at times for supplemental irrigation.

Meter 210834 is golf course maintenance shop and has a 95% adjustor because we use the HVUD water for daily filling of water coolers for customers and staff, and washing equipment.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 18, 2025 9:27 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to confirm that HVUD got back to me and sent me the attached data. Please give me a quick reminder on the 90% and the 95% adjustors added to the clubhouse and the maintenance building. I understand that the Front Clubhouse is irrigation only, but I'm struggling to remember what the adjustors are for on the other items.

Once I get confirmation there, I will add those adjustors to the spreadsheet attached and we can get this resolved.

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: Friday, September 12, 2025 1:42 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As soon as HVUD gets back with me, I will provide you with a timeline for the issuance of credits. Additionally, I will pass along your information regarding the possibility effluent discharge / feedback.

Thanks and have a great weekend!

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: Friday, September 12, 2025 1:19 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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

Outlook

RE: OLD NATCHEZ - calculations

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Fri 9/12/2025 1:29 PM
To Aaron Silas <asilas@cswrgroup.com>

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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

Outlook

RE: OLD NATCHEZ - calculations.revised

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Fri 9/26/2025 12:24 AM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

1 attachment (17 KB)
LIMESTONE - analysis.silas.xlsx;

Mr. Silas –

Please confirm that you have received and read this email.

Attached see the unlocked Excel file per your request, the review of which will confirm what we strongly believe is already evident, that Limestone should accept the methodology and the ERUs it yields without further delay.

In reviewing calculations while drafting this email three errors were identified and corrected, that in the aggregate reduced the restated ERUs to 18 from 19. Also, please note that the "Outlier Variance" row for each meter has been updated to display the variance between outlier data and the average of the 2 remaining data points as a magnitude rather than a percentage because I frequently reference this variance in this manner. The calculation is simply dividing the outlying data point by the average of the two remaining data points in instances where the outlying data point is greater than the average of the remaining data, and the inverse, when the average remaining data is greater than the outlying data. The result is an expression of the degree to which outlying data varies from the rest of the set irrespective of whether the outlying data is less than or greater than the remaining data.

I am available for a call to discuss the methodologies used to identify variances and provisionally restate data, which I will elaborate further upon below. However, I ask that any such call be scheduled no later than end of business Monday 9/29. Our sense is that this matter could have already been resolved, and further use of our time and effort will be most productively directed at completing and filing the formal complaint with TPUC that we temporarily set aside to work directly with Limestone. We believe with more certainty than ever that we have an especially compelling case, that the Consumer Advocate's office will buttress and expand upon our complaint, and that the Commission will conclude that our rate should be adjusted and that the broader commercial rate design should be reviewed.

First, in regards to Limestone's expressed doubts regarding the appropriateness of provisionally restating the HVUD data. From inception to the present moment the aim of this exercise has been to arrive at an accurate assignment of ERUs for Old Natchez. From our first correspondence with Limestone and TPUC our simple premise has been that Limestone's initial assignment of ERUs for Old Natchez was not accurate, and that whatever steps were necessary for arriving at an accurate assignment should be undertaken. Old Natchez has extended considerable time and effort to identify not only multiple sources of inaccuracy, but to provide logical executable solutions to those inaccuracies. Old Natchez identified the inaccuracy inherent in Limestone's methodology of extrapolating from a list of our physical facilities to an arbitrary daily guest count of 250, a 3X+ inaccuracy. Old Natchez identified the inaccuracy inherent in Limestone's assignment of ERUs at multiple other facilities, also in magnitudes of 3X+. Old Natchez identified that systemic inaccuracies in the assignment of individual facility ERUs causes the aggregate quantity of ERUs to be inaccurate, which causes the rates per ERU to be inaccurate. Old

Natchez identified that TPUC commissioners and staff have an inaccurate comprehension of how Limestone assigned ERUs because Limestone's methodology of identifying guest counts or other "second variables", was never presented to TPUC commissioners or staff despite its central necessity in calculating wastewater flows and Limestone's presenting detailed information regarding the "first variables" in its calculations. It is the acknowledgment of this collective inaccuracy that has us brought us to the present point of utilizing HVUD data. Given that the objective of the entire complaint process is to replace inaccurate methods and data with accurate methods and data, we assert that it is unquestionably appropriate given the prima facie evidence of potential inaccuracy within the HVUD data, to provisionally restate it until it can be audited and corrected, and we can fathom no reason that Limestone, TPUC or the Consumer Advocate would reach a different conclusion.

Old Natchez disagrees with Limestone's declaration that the HVUD data set it utilized has been "verified". Specifically, we posit that for any data to be "verified" in a practical sense it must be reasonably precise in measuring what it is intended to measure, in this case wastewater flows. It is an unquestioned reality that water meter performance can be a source of inaccurate data, that protocols for collecting and reporting meter data can be a source of inaccurate data, that almost any large data set will contain inaccurate data and that given its 30,000+ customers HVUD has a large dataset. To declare, at this juncture, HVUD's dataset to be "verified" is to willfully disregard both the general reality of inaccuracy in data collection and the specific inaccuracies in the HVUD data set that Old Natchez has identified and quantified.

Old Natchez rejects Limestone's characterization of Old Natchez's methodology for identifying inaccuracy within, and provisionally restating the HVUD data, as being reliant on "subjective criteria for identifying outliers", as our entire approach is based on a decidedly non-subjective logic flow and careful objective calculations which are presented below. Please note that the discussion herein references data from the Clubhouse meter, as due to its volume, it is the driver of the overall calculation.

Our methodology began with the question "were there any changes in our operations over the 24-month period spanning each month's set of 3 data points that would cause meaningful variances in our water consumption". The answer to this question is "No", as our operational footprint and practices did not change and our population of Members varied less than 2% over the period.

Next, we asked the question "are variances, consistent with inaccuracies, identifiable in the dataset". To answer this question, we assembled the 12-month by 3-year grid of monthly data and calculated the variance from the most outlying data point in each month from the average of the two remaining data points. Data points with significant variances were immediately identifiable both at a prima facie and statistical level. Two months had variances of 3X+, three months had variances of 2X+, and 3 months had variances of 1.25X+ – establishing statistically, not subjectively, that variances at a level consistent with inaccuracies were present. Two months in which the meter began to fail and then failed, were disregarded for this evaluation as the data produced was so skewed as to be unusable.

Next, we asked the question "how can the data be restated to neutralize the impact of outlying data points". To answer this question, we made month-by-month calculations of the variability of the two non-outlying data points from one another, and compared this to the month-by-month variability of the outlying data point from the average of the two remaining data points, to determine whether the remaining data was meaningfully less variable than the outlier data and therefore could be used as a more accurate alternative for restating the data. The remaining data was much more internally consistent, varying less than 5% in 8 of 12 months, and on average varied only 20% vs the outlier data which on average varied over 100% even after the aforementioned months impacted by the failing meter we disregarded. We then established a 1.25X variance in the outlier data as the threshold for using the average of the remaining data as the restated data point, because it far exceeded the expected de minimis variance given the previously referenced lack of change in Old Natchez's operations and membership levels, and because there was an observable "break" in the data for months with variances less than 2X, with 3 of 5 falling at 1.26X or above. For the two months in which outlier data varied by less than 1.25X we used an average of all 3 years data. To further refute the notion that the restated data was subjectively chosen or manipulated to reduce the aggregate restated data, we performed an additional restatement using 1.5X as the threshold for discarding outlier data and used the most recent years data rather than any averaged data for the

months with variances below 1.5x. This additional restatement produced an aggregate restated data that was less than the first restatement, but only by 4,350 gallons which did not impact the final ERU calculation.

We look forward to your timely reply.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 25, 2025 9:07 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations.revised

Mr. Taylor,

Confirming receipt of your email. Give me a few days to look into what you've provided below. From first glance, I'm not sure I agree that it is appropriate to override the most recent and verified 12-month dataset with a selectively "restated" average based on a multi-year reconstruction and internal filtering methodology. The process you've outlined — while well-intentioned — relies on subjective criteria for identifying outliers.

If you're willing to provide me with the excel workbook associated with your calculations, I'd be happy to review further and let you know if your methodology is acceptable to the Company.

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, September 24, 2025 4:28 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: OLD NATCHEZ - calculations.revised

Mr. Silas –

Sorry for lag in providing feedback. Needed to gather expanded data from HVUD and was out of office for a couple days.

Please reference the below discussion and the attached as explanation of a "restatement" from our previous submission of items pertinent to Old Natchez Country Club's entry in the commercial rate design of Limestone Utilities as follows:

- Daily "guests on site" = 57 …*increased from 41*
- ERUs = 19 …*increased from 14*
- Monthly Billing Amount Retroactive to May 2025 = $3,210.24 …*increased from $2,365.44*

Upon your presentation of HVUD data for the period 8/25>7/24, it was immediately evident the total for that period was 200+% greater than the total for the period 5/24>6/23 submitted by Old Natchez. As there was no substantive change in operations across the two periods, an increase of such magnitude warrants additional due diligence to validate the accuracy of the data given its central role in correctly re-calculating ERUs for Old Natchez.

As we assembled 3 trailing years of HVUD meter data for each month beginning with August 2025, it was instantly observable that there were multiple data points that were statistically significant outliers. To further evaluate the data (attached) we "stacked" the totals for each month and identified the most outlying of the 3 data points for each month. We then calculated the degree to which that data was an outlier by calculating the percentage difference between the outlier data point and the average of the other two data points. In the case of the Clubhouse Meter which is the primary driver of usage, there were 9 months in which the outlier data point varied by more than 25% from the other two data points and in 6 of those 9 months the outlier data point was higher. While this level of broad inconsistency is alone sufficient to draw the accuracy of individual monthly data into question, the degree to which individual monthly readings are un-reliable is further illustrated by additional observations:

- The two highest monthly totals in the entire 36-month data set (12/'24 & 1/'25) are in two of the slowest traffic months of the calendar year.
- Totals from March, April & May are consistently less than those from January & February when traffic is markedly higher in the spring vs. winter.
- The average of the 5 highest monthly amounts is 360,240 or 249% greater than the remaining 31 months average of 144,497.

While we still believe utilizing HVUD's data remains the best methodology for establishing daily guests on site and ERUs, we cannot, given the degree of unreliability associated with individual monthly data, agree that any particular 12-month period is suitably accurate and reliable considering the gravity of its intended use. Given this landscape, we are seeking resolution via a two-fold approach. First, we have restated the available data and calculated a "provisional" ERU estimate for an initial resetting of the Old Natchez ERUs. Second, we will work with HVUD to audit and correct the metering process and establish accurate data which can be used to calculate a "corrected" ERU estimate for ongoing rate design purposes and, to "true-up", billings based on the "provisional" ERU estimate.

To restate the available data, we made adjustments to reduce the impact of outlier data and calculate a "restated" total for each month. In the attached [OLD NATCHEZ – calculation.revised] the outlier data for each month is shaded yellow, the first row below the monthly data is the percentage variance of that month's outlier data and the second row below the monthly data is the restated total for each month calculated as follows. For months with outlier data points that varied by 25+% from the average of the other two data points (shaded pink), we discarded the outlier data and calculated the average of the remaining two data points as the monthly restated total. For months with data points varying less than 25% from the average of the other two data points (shaded green), we calculated the average of the three data points as the monthly restated total. The 12-month sum of the monthly restated amounts results in a restated annual waste water estimate and ERU of 2,076,482 and 19 respectively. To resolve errors in the metering process and enable calculation of a corrected ERU estimate, we will immediately initiate a review directly with HVUD, and as necessary, retain a specialist third party.

We appreciate the ongoing attention to this matter and look forward to continuing to work within the framework of Limestone's discretion to review ERU calculations, and TPUC's complaint protocols, to adopt the presented "provisional" ERU calculations and work quickly to establish "corrected" ERU calculations.

Please confirm your receipt of this email, and the data as presently revised and the plans presented for further revising the data.

Of course, feel free to let me know if you need to schedule a call to discuss any aspect of this matter.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 23, 2025 3:27 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to follow up here to see if you were comfortable with the ERU reassignment. If so, I can get your credit issued, your fees waived, and the monthly billing corrected going forward.

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: Thursday, September 18, 2025 11:42 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As you are requesting an update to the "Design Basis" portion of the ERU calculation (guest count), there is no basis for using the test period. We are simply trying to come up with a replacement to the 250 guests used in the calculation and the most recent verifiable data (in this case, the information received from HVUD) is the most accurate way to do this.

While we cannot verify the 90% & 95% adjustors, I am willing to take your work and apply those adjustors.

In the reattached document, the calculations show a total guest count approximation of 83 guests. By replacing the 250 design basis with 83, the new ERU calculation would be 27 as opposed to the current 83. This reduction of 56 ERUs would result in a monthly bill reduction of approximately $9,461.76. If you are comfortable with these calculations, I'll get the credit issued, late fees waived, and ERUs adjusted for the go-foward basis.

Please also note that you'll have an opportunity to provide updated information (if you so choose) prior to the 2026 Phase 2 implementation.

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, September 18, 2025 11:12 AM

To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

What is the rationale behind switching to most current trailing 12 vs. the 12 months that overlays with the test period used in the rate design?

Meter 210668 is clubhouse and has a 90% adjustor because we use the HVUD water for the daily washing our golf cart fleet, daily washing of our outdoor dining patios/balconies, and use it at times for supplemental irrigation.

Meter 210834 is golf course maintenance shop and has a 95% adjustor because we use the HVUD water for daily filling of water coolers for customers and staff, and washing equipment.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Thursday, September 18, 2025 9:27 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

I wanted to confirm that HVUD got back to me and sent me the attached data. Please give me a quick reminder on the 90% and the 95% adjustors added to the clubhouse and the maintenance building. I understand that the Front Clubhouse is irrigation only, but I'm struggling to remember what the adjustors are for on the other items.

Once I get confirmation there, I will add those adjustors to the spreadsheet attached and we can get this resolved.

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: Friday, September 12, 2025 1:42 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ - calculations

Mr. Taylor,

As soon as HVUD gets back with me, I will provide you with a timeline for the issuance of credits. Additionally, I will pass along your information regarding the possibility effluent discharge / feedback.

Thanks and have a great weekend!

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: Friday, September 12, 2025 1:19 PM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ - calculations

Mr. Silas –

Thank you again for your work on this matter, and your timely reply that our rate will be adjusted to $2,365.44/month - retroactive to May 2025. Please also accept this email as permission to contact HVUD for purposes of verifying the invoice data that was provided in support of our calculations – if HVUD needs direct communication with me please have them email me or call me on my cell 615-417-8219 as contact info they have on the account may be out of date since we have been a customer since the 1990s.

Lastly, please let me know the timeline for the issuing of credits etc., and don't hesitate to contact me if I can be of assistance moving forward in regards to exploring the possibilities of Old Natchez being a destination for effluent discharge or feedback from an actual customer as Phase 2 of the commercial rate plan is being designed.

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Friday, September 12, 2025 12:50 PM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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

Outlook

RE: OLD NATCHEZ - follow-up.10.8.25

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 10/21/2025 5:02 PM
To Aaron Silas <asilas@cswrgroup.com>

Mr. Silas –

Thank you for your assistance in this matter and confirmation that our ERUs will be 20 and our monthly sewer service amount will be $3,379.20.

I have confirmed with Limestone Customer Service that an additional credit of $6,628.73 has been posted to our account to reflect the additional credit due from prior billings prior to the final ERU recalculation and to reflect the penalty charged at 8/31/25 that was not credited at 9/30/25.

We will process payment for the remaining balance of $16,884.81 this week.

Lastly, can you advise of any updates relative to the commercial rate design for Phase 2?

Best Regards,
Glynn Taylor

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, October 21, 2025 10:19 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #3

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 7/29/2025 12:53 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos.Black@tn.gov <Carlos.Black@tn.gov>

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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 Limestones 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.

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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #4

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Mon 8/4/2025 11:52 AM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

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 out 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 Limestones 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.

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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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 Limestones 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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #4

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 7/29/2025 1:25 PM
To Aaron Silas <asilas@cswrgroup.com>

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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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

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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

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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:

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   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".

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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".

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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.

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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #5

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Mon 8/18/2025 3:22 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #5

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Mon 8/11/2025 11:56 AM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

CSWR
Central States Water Resources

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.

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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

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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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #7

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 8/19/2025 9:56 AM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #8

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 8/19/2025 12:44 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

Mr. Silas –
Can you also advise as to the total quantity of Limestone commercial wastewater customers that were subject to this rate increase process
Thanks,
Glynn

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 Limestones 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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #8

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 8/19/2025 3:33 PM
To Aaron Silas <asilas@cswrgroup.com>
Cc Carlos Black <Carlos.Black@tn.gov>

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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 Limestones 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

Outlook

RE: OLD NATCHEZ CC - cartwright creek review #9

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 8/19/2025 4:51 PM
To Aaron Silas <asilas@cswrgroup.com>

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 Sustomers 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 out 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 Limestones 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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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:

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.
1-314-380-8510

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

Outlook

Re: OLD NATCHEZ CC - cartwright creek review #10

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 9/9/2025 11:34 AM
To Aaron Silas <asilas@cswrgroup.com>

TY!

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 9, 2025 11:29:48 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

3pm should work for me.

Thanks!

From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, September 9, 2025 11:26:49 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Aaron -
Sorry I've gotten stuck on another matter and don't think I can jump on call until 3pm - can you shift to that time?
Glynn

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 9, 2025 9:14:35 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Yup, that works for me! I'll mark it on my calendar.

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 9:12 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #10

1pm CT is good - at 314-380-8510?

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 9, 2025 9:00 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Mr. Taylor,

Does 1pm CT work for 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 8:54 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #10

Mr. Silas –
Think it could be productive to schedule a call. Are you available this afternoon?
Best Regards,
Glynn

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, September 8, 2025 9:56 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,

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
<< RTF: Rich object >>
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

<< RTF: Rich object >>

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 Sustomers 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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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 out 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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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 Limestones 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:

<< RTF: Rich object >>

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."

<< RTF: Rich object >>

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.

<< RTF: Rich object >>

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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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.

<< RTF: Rich object >>

Regarding the Assertion of an Arbitrary Variable

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

(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.

<< RTF: Rich object >>

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.
1-314-380-8510

<< RTF: Rich object >>

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

Outlook

Re: OLD NATCHEZ CC - cartwright creek review #10

From Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Date Tue 9/9/2025 11:34 AM
To Aaron Silas <asilas@cswrgroup.com>

TY!

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 9, 2025 11:29:48 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

3pm should work for me.

Thanks!

From: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Sent: Tuesday, September 9, 2025 11:26:49 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Aaron -
Sorry I've gotten stuck on another matter and don't think I can jump on call until 3pm - can you shift to that time?
Glynn

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 9, 2025 9:14:35 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Yup, that works for me! I'll mark it on my calendar.

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 9:12 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #10

1pm CT is good - at 314-380-8510?

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Tuesday, September 9, 2025 9:00 AM
To: Glynn Taylor <Glynn.Taylor@oldnatchezcc.com>
Subject: Re: OLD NATCHEZ CC - cartwright creek review #10

Mr. Taylor,

Does 1pm CT work for 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 8:54 AM
To: Aaron Silas <asilas@cswrgroup.com>
Subject: RE: OLD NATCHEZ CC - cartwright creek review #10

Mr. Silas –
Think it could be productive to schedule a call. Are you available this afternoon?
Best Regards,
Glynn

From: Aaron Silas <asilas@cswrgroup.com>
Sent: Monday, September 8, 2025 9:56 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,

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
<< RTF: Rich object >>
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

<< RTF: Rich object >>

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 Sustomers 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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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 out 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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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 Limestones 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:

<< RTF: Rich object >>

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.”

<< RTF: Rich object >>

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.

<< RTF: Rich object >>

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 guests/day × 100 gallons = 25,000 GPD ÷ 300 GPD per ERU = 83.33 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.

<< RTF: Rich object >>

Regarding the Assertion of an Arbitrary Variable
To be clear, there is no third, arbitrary variable introduced. The methodology follows this formula:
(Flow from TDEC table) ÷ 300 = ERUs × $168.96 = 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.

<< RTF: Rich object >>

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.
1-314-380-8510

<< RTF: Rich object >>

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 <u>not possible</u> 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", <u>indicates only</u> 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 <u>does not include a typical quantity for the units of estimation</u> 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 Limestones 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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

<< RTF: Rich object >>

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

Public 1-3(f)

Customer Call Logs (5.1 – 3.2)

Log Date	Account Number	Name	Service Address	City	State	Zip	Notes
2/2/2026	[redacted]			Counce	TN	38326	Bill investigation, they are put in as having 83 rooms but they only have 50 rooms and have had only 50 rooms can we have it looked at and conform there is only 50 room and have the acct updated to be billed for 50 rooms and not 83 rooms. [redacted], did advice that they was charged for 83 when they only have the 50. ***---- Customer called regarding a significant increase in their sewer service bill. Initially charged based on usage, they were switched to a flat rate, which they found confusing and excessive. The customer expressed concern over being billed for more rooms than they actually have. After reviewing the account, I explained the reasons for the rate increase and initiated a service order to confirm the actual number of rooms. I assured the customer that once confirmed, we could investigate potential billing adjustments. The call ended with the customer feeling somewhat reassured but still concerned about the billing issue.
2/10/2026	[redacted]			Counce	TN	38326	[redacted] cx state they have 50 rooms, 1 common area with 2 lobby toilets, 1 breakroom with toilet. she is requesting billing be reviewed and adjusted accordingly, as they have been billed for 83 ERUs and that's incorrect. customer is requesting to please communicate findings and resolution via email.
2/10/2026	[redacted]			Counce	TN	38326	[redacted] Customer called to follow up on a previous inquiry regarding an increase in sewer charges for their hotel. They believe they are being charged for more rooms than they actually have. Discussed the billing structure and the transition from a metered to a flat rate. Customer was frustrated with the lack of clarity in the billing and the absence of a breakdown of charges. Informed about the billing review process, which may take up to several billing cycles. Customer plans to communicate findings to the owner and will follow up on the review.
2/11/2026	[redacted]			Counce	TN	38326	Customer has been billed for 83 units from 05/01/25 services to current. Customer should have been billed $2946.80 a month for 53 units. Credited the account $15,037.11.
2/11/2026	[redacted]			Counce	TN	38326	Spoke with [redacted], regarding their billing case. I have advised that $15,037.11 was refunded; however, some billing was debited from that amount, leaving a credit of $10,419.52 remaining on the account. I asked if she wanted the remaining credit refunded or to leave it on the account as a credit and she advised that she would get back to me once she spoke with the owner of [redacted].
2/14/2026	[redacted]			Counce	TN	38326	Please find attached a formal written appeal regarding the recent change in sewer billing methodology for Hampton Inn Pickwick, [redacted] We are requesting review of the current non-metered sewer calculation, as the resulting charge reflects a substantial increase without any change in water usage, occupancy, or property operations. The attached letter outlines our concerns and the specific information being requested. Please confirm in writing that this account has been placed in formal dispute status and that penalties, interest, or enforcement actions will be suspended while this matter is under review. We appreciate your prompt attention and look forward to your response. Sincerely, [redacted] RESPONSE: Response to Your Inquiry Â Dear [redacted], Thank you for reaching out toÂ Limestone Water Customer Support. We appreciate the opportunity to assist you. Â In response to your inquiry: After reviewing the account, it appears $15,037.11 was credited to the account, however, some billing was debited from that amount, leaving a credit of $10,419.52 remaining on the account. Have you had a chance to speak with the owner in regards to the credit being refunded or left on the account? Â Best regards,
2/17/2026	[redacted]			Counce	TN	38326	Received email: Yes the owner wants the refund mailed the hotel, I already spoke with someone about that. But he is still questioning the bill being more than double what it used to be and wants to know what we canâ€™t be based of metered usage instead of a flat rate fee per room as we are not 100% Occupancy year round, as a matter of fact last years total Occupancy was around 65% so therefore we are paying for many rooms that are not being used on a daily basis. My response: I have created a note for your account advising that the owner wants the refund mailed to the hotel and that he was still questioning the bill. Thank you for your patience while this issue gets resolved.

Public 1-3(i)

Rate Increase Customer Comms
(Log of Customer Contacts)

Log Date	Account Number	Name	Service Address	City	State	Zip	Notes
5/15/2025	[redacted]			SAULSBURY	TN	38067	[redacted] called stating she asked before and never heard back, but they have an HOA meeting on Saturday 5/17/25 and would like a representative from Limestone present. I advised I will pass this on to our team to see if someone will either reach out to her via phone/email or be present at the meeting...BL
6/2/2025	[redacted]			SAULSBURY	TN	38067	couldn't transfer back to the ivr ah hung up Customer called to make a payment using a debit card but faced difficulties with online options and the automated system. Expressed frustration over not having a computer or smartphone, relying instead on a flip phone. Requested assistance in making a payment over the phone but was informed that payments could only be processed through the automated system. Customer was encouraged to try the automated system again. Overall, the call highlighted the customer's challenges with technology and the urgency of making a payment.
6/6/2025	[redacted]			Nolensville	TN	37135	[redacted] Customer called to inquire about a recent increase in their monthly service charge. After verifying their account details, explained that there was a rate increase effective from a specific date. Customer acknowledged the information and mentioned they may have missed a notification letter. Expressed appreciation for the clarification and confirmed that they did not have any further questions. Ended the call on a positive note, indicating satisfaction with the assistance provided.
6/6/2025	[redacted]			Franklin	TN	37069	Customer called regarding a sudden increase in their account rate. Expressed frustration over the lack of notification about the increase, which was attributed to necessary infrastructure upgrades. Customer felt overwhelmed by rising costs and was concerned about missing payments. Clarified that no payments were missed and acknowledged the oversight in communication. Customer wanted to ensure their information was current and went on record expressing dissatisfaction with the rate hike. Appreciated the assistance but remained unhappy with the situation. [redacted]
6/11/2025	[redacted]			Savannah	TN	38372	[redacted] emailed advising he was told the rate increase was temporary and would be reduced and was told to email to ask the expected date for the rates to return to $30. -I responded apologizing for the misunderstanding and explained there is not current plan to reduce the rates. Explained reason for Rate Change and provided billing insert from website.
6/11/2025	[redacted]			Savannah	TN	38372	[redacted] emailed back stating he knows that the rates will not go down. I responded after receiving more info. I explained the surcharge is temp and explained Limestone works closely with the appropriate regulatory agency to track these costs. Once Limestone and the regulatory agency are able to confirm all approved expenses have been recovered, the surcharge will be removed from customer bills. There is not yet a set date in place for this.
6/12/2025	[redacted]			Savannah	TN	38372	[redacted] emailed asking if we have increased the cost of water service. Informed of rate change.
6/13/2025	[redacted]			Savannah	TN	38372	[redacted] emailed over his thoughts on the rate increase I thank you for confirming that you have doubled my water bill. So Iâ€™m paying double for the same service I had before. I know youâ€™ve spent money to improve the infrastructure. So you want me and all of your customers to subsidize your expenditures for that. I think you should keep track of that money and when you are totally reimbursed, I expect the rates to come back down to where they were before you raised them. Thatâ€™s my two cents worth. Regards: emailed advising I received this and have noted his acocunt with his thoughts.
6/23/2025	[redacted]			Franklin	TN	37069	Customer called to inquire about recent rate changes. Expressed frustration over not receiving detailed information about the increase. After confirming the new rate, requested that the information be emailed to a new email address. Updated the email on the account and assured the customer that the request for rate increase details would be sent. Customer ended the call feeling appreciated and satisfied with the assistance provided.
8/1/2025	[redacted]			Counce	TN	38326	[redacted] called in wanting to rate accessed saying we are charging him for 8 ERUs and believe it should be much less did email a copy of water bill Customer called regarding ongoing issues with billing and service address discrepancies. Frustrated by repeated disconnections during previous calls, the customer detailed a billing dispute related to a recent rate change. They emphasized that their charges were significantly higher than expected based on their actual water usage. Despite sending written notices and emails, the dispute remained unresolved, leading to concerns about accumulating late fees. The call involved reviewing the account details and discussing the need for a reassessment of the billing based on actual usage. The customer was informed that notes would be added to their account.
9/8/2025	[redacted]			LAFOLLETTE	TN	37766	[redacted] customer is on a commercial service rate which the location is a home and they rarely use service well for water. looks like rates increased for commercial users.
9/9/2025	[redacted]			Counce	TN	38326	Attempted to reach customer (voicemail is not set up) to address concerns with ERU's. Need their total guest capacity to review possible adjustment.
9/29/2025	[redacted]			Franklin	TN	37069	[redacted] Customer called to inquire about a noticeable increase in their water service charges. After verifying their account details, I explained that the flat charge rate had increased due to a change in the rate schedule. The customer was surprised by the magnitude of the increase but was primarily seeking clarification. I confirmed the new rates and provided the relevant details from the rate schedule. The customer acknowledged the information and indicated that they had no further questions. The call ended on a neutral note, with the customer thanking me for the assistance.
11/19/2025	[redacted]			Franklin	TN	37069	[redacted], Customer called to inquire about a significant increase in their sewer bill. Discussed the reasons for the increase, which were attributed to a rate hike communicated on the website. Customer expressed dissatisfaction with the lack of notification and questioned the fairness of the increase, especially as a small business. Informed that rates are standardized and cannot be adjusted for individual customers. Customer asked if there was someone else to speak to regarding potential relief but was told that all customers are subject to the same rates. Customer thanked for the information but remained concerned about the impact of the increase.
12/19/2025	[redacted]			Franklin	TN	37069	[redacted] Customer called to inquire about a significant increase in their water bill, which had risen from a previous amount to a much higher one. Expressed frustration over the rate changes and questioned the reasons behind the increase. Explained that the rates are set by a commission and are influenced by various factors such as operating costs and regulations. Customer seemed dissatisfied with the explanation but appreciated the assistance provided. Ended the call with a polite exchange, wishing each other well.
1/9/2026	[redacted]			Savannah	TN	38372	[redacted] Customer called to inquire about a high balance on their water account for a property that has been unoccupied for several months. Verified account details and confirmed that the charges were for water and sewer services, with no usage reported at the location. Customer expressed concern about potential leaks but was reassured that there were no indications of water usage. Customer thanked for the assistance and confirmed satisfaction with the information provided. Ended the call on a positive note.
1/12/2026	[redacted]			Franklin	TN	37069	[redacted] Customer called to inquire about a potential rate increase for the upcoming year. Verified service address and contact information. Confirmed that there is currently no rate increase. Provided the customer with the monthly amount they are being charged. Customer expressed appreciation for the information provided. Ended the call by informing the customer about a brief survey that would follow the call.
1/20/2026	[redacted]			LAFOLLETTE	TN	37766	"I was being charged under $70 per month for most months. You are tripling this rate. This home goes unused most of the year, averaging about 18 rentals per year (and some of them are not a full week). I will accept a 2 ERU setting, which almost doubles the rate you were charging, but the $220 for months that it is not used is not fair."
6/4/2025	[redacted]			Franklin	TN	37069	[redacted] Attempted call back regarding billing dispute Spoke with customer explained how balance is confirmed based of increase for ERU per Limestone and why customer units increased from 1 to 36 units in a one month period for account [redacted]36units x 168.96 = $6,082.56 plus tax. for account [redacted]21units x 168.96 = $3,548.16 plus tax. After speaking with the back office and confirming the units on the account customer accounts were orginaly based on a old rate when we took over the account and now with us take over and the rate increasing customer is being charged based on a ERU (Estimated Residential Unit) will be following up with customer Friday in regards to this further after reviewing additional information pertaining to ERU Main reason for increase in bill is now based on customer being charged per ERU Customer is now currently out of the office will call back Friday morning

Log Date	Account Number	Name	Service Address	City	State	Zip	Notes
6/6/2025	[redacted]			Franklin	TN	37069	Spoke with customer explained how balance is confirmed based of increase for ERU per Limestone and why customer units increased from 1 to 36 units in a one month period for account [redacted] 36units x 168.96 = $6,082.56 plus tax. for account [redacted] 21units x 168.96 = $3,548.16 plus tax. After speaking with the back office and confirming the units on the account customer accounts were originally based on a old rate when we took over the account and now with us take over and the rate increasing customer is being charged based on a ERU (Estimated Residential Unit) will be following up with customer Friday in regards to this further after reviewing additional information pertaining to ERU Main reason for increase in bill is now based on customer being charged per ERU Customer is now currently out of the office will call back Friday morning How Commercial Sewer Charges Are Calculated: Limestone Water uses a consistent method to calculate sewer charges for commercial properties based on something called Equivalent Residential Units, or ERUs. Â· Whatâ€™s an ERU? One ERU represents the typical amount of wastewater a single-family home sends into the sewer system. This becomes our baseline. Â· How are commercial properties billed? We look at the type of business and how much wastewater it typically generatesâ€"based on state design guidelines. Most small businesses, like offices or shops, are assigned 1 ERU, just like a home. But larger businesses that use more water and create more wastewaterâ€"like restaurants, gyms, or country clubsâ€"may be assigned more ERUs to reflect their higher usage. For example, a country club that serves many guests might be assigned 40 ERUs. Â· Why do we do this? This approach helps make sewer billing fair. Businesses that use the system more contribute more toward its upkeep.
6/10/2025	[redacted]			Franklin	TN	37069	Customer called regarding a billing issue, noting that their recent bill was significantly higher than the previous month. After verifying account details, I explained that the increase was due to a change from a residential to a commercial account, which included a rate increase. The customer expressed confusion about how the account was initially set up as residential. I offered assistance with setting up a payment arrangement if needed. The customer appreciated the information and indicated they would discuss it with their team before potentially calling back to arrange payment. explained the ERU and 13 units at the $168.96 a unit . [redacted]
6/12/2025	[redacted]			Franklin	TN	37069	[redacted] [redacted] WANTS SUP CALL BACK DUE TO RATE INCREASE FROM $100 TO OVER $14,000. THREATS TO CONTACT DAVID JONES TN PUBLIC UTILITY COMMISSION, explained the process of how commercial billing is done for sewer account and why customer is being the charged this amount by providing a break down for the rate and erus customer is being charged for explained this Limestone Water uses a consistent method to calculate sewer charges for commercial properties based on something called Equivalent Residential Units, or ERUs. And the reason we do this is approach helps make sewer billing fair. Businesses that use the system more contribute more toward its upkeep. Customer understood my explaination but argued this is not correct reassured customer we do have a billing dispute and a billing investigation S/O as well but explained we are just following state guidelines approved by the regulatory industry as well when these changes are made
6/13/2025	[redacted]			Arrington	TN	37014	[redacted] customer called in to speak with sup, because they sent a check that was cashed. i dont show it has been processed. wants to have fee removed. wants to speak to someone now after advising they can send in proof of payment says second time calling in [redacted] States there is a missing payment we show check was cashed by us [redacted] $62.75 check was cashed on 5/27/25 and was cashed from PMC Bank With bank endorsement Amount was debit from customer account Provided the customer support email support@limestonewateruoc.com Waive late fee as a courtesy for the customer as well Customer will be sending proof to our support email confirming payment was made and cashed please look into this once email is received and attach to account
6/17/2025	[redacted]			Savannah	TN	38372	Customer called regarding high water and sewage charges for several irrigation meters. Expressed frustration over being charged sewage rates for meters that only serve irrigation purposes and do not connect to a sewage line. Discussed the recent rate increases and how they impact commercial accounts. Customer emphasized that only a few toilets are connected to sewage lines, while the majority of the meters are for irrigation. Requested clarification and resolution on the sewage charges, indicating willingness to escalate the issue if necessary. Agreed to put in a billing dispute for further review. Did educate cx on eru and how that is based on the plans of the account. Cx insisted they were being charged sewage for the irrigation meters that were on there as well. I was adv that it is based on how much estimated waste water is going to be produced not necessarily how many meters are there. Put in billing dispute but made no promises of changes occurring. [redacted]. Cx hung up before outro.
6/20/2025	[redacted]			Counce	TN	38326	[redacted] Would like ERUs to be recalculated and contacted with the recalculation. Usage on previous bills have been around 150000 gallons and according to ERU calculation, 1 ERU = 300 gallons per day. Service address should be listed as [redacted] for this Inn. Customer called regarding billing issues, expressing frustration over being charged for services at an incorrect address. Customer has not received a response to previous inquiries and is concerned about potential late fees. Discussed the need for recalculating equivalent residential units based on actual usage. Submitted a billing dispute and noted the incorrect service address for further investigation. Customer requested updates via email and phone. Acknowledged the urgency of resolving the issue to avoid financial strain.
6/24/2025	[redacted]			Franklin	TN	37069	[redacted] [redacted] requesting supervisor for explanation regarding how his utility was determined to be 83 units. He's checked in the Tennessee department of conservation document and can't find it. His phone number is [redacted] [redacted] [redacted] Example: Hotel â€¢ The guideline estimates 50 gallons per guest per day. â€¢ Since 1 ERU = 300 gallons, each hotel guest represents 0.167 ERUs (50 Ã· 300). â€¢ For a hotel with an occupancy limit of 400 guests, the ERU calculation would be: 400 guests Ã— 0.167 = 67 ERUs Customer amount of guests enrolled Customer believes he isnt being charged correctly 497 *0.167=83 ERUs customer doesnâ€™t understand how we came up with the number of people to multiple to come up with the units (ERU) customer is requesting his ERU assignment to be reviewed to confirm this is accurate and prove this information is valid and correct Dosent understand why is water bill is cheaper than sewer explained rates are different compared to both tried to provide formula break down but believes our estimates are in correct Customer would like to submit a review for his ERU assignment over this matter since per customers words the math is not mathing when he looks at his water usage and compares that to his sewer bill tried to explained these are 2 different things but customer refused to let me speak further requesting this to be reviewed emailed client contact with information

Log Date	Account Number	Name	Service Address	City	State	Zip	Notes
6/26/2025	[redacted]			Franklin	TN	37069	[redacted]36 units [redacted]21 units Attempted call back regarding billing dispute Spoke with customer explained how balance is confirmed based of increase for ERU per Limestone and why customer units increased from 1 to 36 units in a one month period for account [redacted]36units x 168.96 = $6,082.56 plus tax. for account [redacted]21units x 168.96 = $3,548.16 plus tax. After speaking with the back office and confirming the units on the account customer accounts were originally based on a old rate when we took over the account and now with us take over and the rate increasing customer is being charged based on a ERU (Estimated Residential Unit) will be following up with customer Friday in regards to this further after reviewing additional information pertaining to ERU Main reason for increase in bill is now based on customer being charged per ERU Customer is now currently out of the office will call back Friday morning How Commercial Sewer Charges Are Calculated: Limestone Water uses a consistent method to calculate sewer charges for commercial properties based on something called Equivalent Residential Units, or ERUs. Â· Whatâ€™s an ERU? One ERU represents the typical amount of wastewater a single-family home sends into the sewer system. This becomes our baseline. Â· How are commercial properties billed? We look at the type of business and how much wastewater it typically generatesâ€"based on state design guidelines. Most small businesses, like
6/27/2025	[redacted]			Counce	TN	38326	[redacted] Customer called in because he have been calling in for three weeks trying to figure out why his bill went from 200-1100 dollars. I explained the rate change that went into effect in May. He stated he will like for someone to call back with why he have two different sewer line rates, what logic did we come up with to determine his rate, and why is his correct address is at the top of the bill, and under service address we have the business next to him. He believe we are reading the business next to him and not his. After further investigation it was confirmed customer was being charged for both commercial and residential this has further been corrected and adjusted the bill accordingly for the customer as well Customer received a adjustment on bill and residential service was removed also Customers new bill is now 447.59 prior to any late fees being assessed The guideline estimates 50 gallons per guest per day. Since 1 ERU = 300 gallons, each guest represents 0.167 ERUs (50 Ã· 300). For an Apartment House with an occupancy limit of 18 guests, the ERU calculation would be: 18 guests Ã— 0.167 = 3 ERUs For Commercial Sewer Only (Comm Sewer) customers: Rates are based on ERUs (Equivalent Residential Units). â€¢ 1 ERU = 300 gallons per day This is the standard wastewater flow assumed for a typical single-family home. â€¢ Commercial properties are assigned ERUs based on expected daily wastewater flow using design assumptions from the Department of Environment and Conservationâ€™s "Design Basis for Wastewater Flow and Loading" guidelines.
7/2/2025	[redacted]			Franklin	TN	37069	I spoke with [redacted] earlier this morning, who at the time of my call, was working on providing us and the PUC with a summary of his review of or tariff and his profound disagreement with the methodology used to arrive at the ERU assigned. [redacted] stated th final submission of our tariff states that customers have the right to have a review of their ERU's by Limestone if they feel they have been calculated incorrectly. He provided me with the following numbers: 48 FTE's, and @1,100 members. [redacted] stated they will not be paying the current charges. His summary / analysis will be sent to myself and the PUC either by EOB or right after the holiday weekend.
7/9/2025	[redacted]			Savannah	TN	38372	[redacted] would like a call from supervisor in regards to his facility (warehouse) having a busted pipe. Attempted contact received vm with message mailbox is full before we can proceed with adjustment we need to confirm leak is repaired and customer to send us proof leak was repaired aka Invoice from plumber customer will need to email us a copy of invoice with his name, phone number, and account number attached to our support email support@limestonewateruoc.com and give us 1-2 business days to get it uploaded before we can start the adjustment process we would also advise adjustments can take up to two billing cycles to be completed
7/14/2025	[redacted]			Franklin	TN	37069	250217|TN-PUC|Rates|TN PUC|Since 2022 our business [redacted] has been billed approximately 50 per month for wastewater services provided by Limestone Water. Our bill for May was 14023!!! I first called Limestone on Monday 6 9 and spoke to CSR who said they would have a supervisor call me. No one called. I called again on 6 12 and was advised that as part of a rate increase our business went from being billed based on 1 ERU to 83 ERU and that this was a ratio that was set by the TPUC .|
7/15/2025	[redacted]			Franklin	TN	37069	250217|Response: Under the Cartwright Creek tariff, Limestone Water was allowed to bill customers based on actual usage. However, due to the inability to measure individual consumption, a flat rate of $37.00 per month was charged, which was lower than what usage-based billing would have produced. As a result, customers were effectively underbilled during this period. Effective May 1, 2025, Limestone Water updated its billing methodology to charge commercial customers based on Equivalent Residential Units (ERUs), reflecting average single-family home wastewater usage. Specifically, the property [redacted] within the Grasslands system, is billed $168.96 for 83 ERUs, plus a $2.79 monthly surcharge to recover rate case expenses over three years. Importantly, despite the prior underbilling, no retroactive billing will be applied. Customers will only be billed under the updated rate structure moving forward. Customer Contact: [redacted] spoke with the manager of our call center on July 2, 2025, following receipt of his complaint regarding billing concerns. While he acknowledges the methodology used to determine the ERUs, he disagrees with both the monthly amount and the overall calculation. He stated that he will not be paying the current charges and plans to submit a breakdown outlining what he believes to be the correct format. His intent is to support a reduction in the monthly billing amount. If the information he provides leads to any changes to the account, he will be informed. I have attached a copy of the current statement along with a copy of the tariff.

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7/15/2025	[redacted]			LAFOLLETTE	TN	37766	250217 | Response: Effective May 1, 2025, Limestone Water revised its billing methodology for commercial customers, transitioning to a system based on Equivalent Residential Units (ERUs). This approach reflects the average wastewater usage of a single-family home. The property located at [redacted] within the Lakeside Estates (DSH) system, is operated as a vacation rental and can accommodate up to 18 guests. As a result, it has been assigned 3 ERUs for wastewater service. Each ERU is billed at $55 per month, totaling $165 monthly, in addition to a $2.79 monthly surcharge to recover rate case expenses over a three-year period. Because the propertyâ€™s guest capacity significantly exceeds that of a standard single-family residence, the 3 ERU assignment reflects its higher potential daily wastewater flow. Customer Contact: I spoke with [redacted] to address his concerns regarding the recent changes to the billing structure. He requested all documents related to the rate case filing that led to the adjustment. I directed him to our website to view the approved tariff and rate schedule and also offered to explain the calculation verbally. Additionally, I provided him with the docket number, as he mentioned having difficulty locating the information on the Tennessee Public Utility Commissionâ€™s website. Prior to receiving the complaint, we spoke with [redacted] on six separate occasions and addressed his concerns each time. However, despite these efforts, [redacted] remains unsatisfied.
7/28/2025	[redacted]			Counce	TN	38326	[redacted] Doesn't have an account yet, trying to get a sewer TAP and wants to pay for TAP fee. Sent in application and haven't heard back. [redacted] Applied under name [redacted]. Originally sent in an email to support@limstonewateruoc.com on July 14th. Hasn't heard anything back yet. He believed that he would send in the application, we get back with them, letting him know how much money needs to be paid, but he has not heard anything about the money yet. Tap request created and new account with approval, S/O # 69011 [redacted] --- Customer called to inquire about the status of a sewer tap application submitted for a construction project. The call involved verifying details about the application and the service address. The customer was informed that the typical processing time is around 5 to 10 business days. After confirming the necessary information, the customer was assured that they would receive updates via email. The customer expressed appreciation for the assistance provided during the call.
8/1/2025	[redacted]			Counce	TN	38326	[redacted] called in wanting to rate accessed saying we are charging him for 8 ERUs and believe it should be much less did email a copy of water bill Customer called regarding ongoing issues with billing and service address discrepancies. Frustrated by repeated disconnections during previous calls, the customer detailed a billing dispute related to a recent rate change. They emphasized that their charges were significantly higher than expected based on their actual water usage. Despite sending written notices and emails, the dispute remained unresolved, leading to concerns about accumulating late fees. The call involved reviewing the account details and discussing the need for a reassessment of the billing based on actual usage. The customer was informed that notes would be added to their account.
8/22/2025	[redacted]			Brentwood	TN	37027	[redacted] [redacted] ISS : [redacted] is the treasure of the HOA // stated that he has gotten 3 bills that is just really high and would like to know what is going on RES : explained to him about the ERU and the flat rate // stated that he is not pleased and would like for this to be under review due to the clubhouse not being very big // also stated that he needs this to be fixed and some type of compensation on the matter for the HOA // let him know that I can notate his acct about this Customer called regarding a significant increase in their HOA water bill. Initially confused about the charges, they sought clarification on why their account was classified with multiple units, leading to higher fees. After discussing the situation, the customer expressed dissatisfaction with the increase and the rationale behind the unit classification. They requested a review of the charges and a potential credit for the HOA. The call ended positively, with the customer appreciating the assistance provided and the commitment to further investigate the issue.
9/9/2025	[redacted]			Counce	TN	38326	Attempted to reach customer (voicemail is not set up) to address concerns with ERU's. Need their total guest capacity to review possible adjustment.
9/9/2025	[redacted]			Counce	TN	38326	Attempted call back for [redacted] was able to contact [redacted] Customer refused to provide the information and demanded how we come up with erus Explained we base this as follows The guideline estimates 50 gallons per guest per day. Since 1 ERU = 300 gallons, each guest represents 0.167 ERUs (50 Ã· 300). For an Apartment House with an occupancy limit of 18 guests, the ERU calculation would be: 18 guests Ã— 0.167 = 3 ERUs For Commercial Sewer Only (Comm Sewer) customers: Rates are based on ERUs (Equivalent Residential Units). â€¢ 1 ERU = 300 gallons per day This is the standard wastewater flow assumed for a typical single-family home Commercial properties are assigned ERUs based on expected daily wastewater flow using design assumptions from the Department of Environment and Conservationâ€™s "Design Basis for Wastewater Flow and Loading" guidelines https://www.tn.gov/environment/search-results.html#q=dwr-npdes-sop-g-02-ww&tab=department customer states he has 20 living units but is not fully occupied normally occupancy rate is 50% around the year and only allows 2 people per unit Customer refused to provide a clear answer and also advised best form of contact if unable to reach by phone is thru email at [redacted]
11/7/2025	[redacted]			Savannah	TN	38372	250351 | Response: Billing for this property was initially established in March 2021 based on information provided by the seller when the Aqua Water Utilities system was acquired. All bills have been mailed via USPS to [redacted], with no mail returned as undeliverable. A welcome letter was also sent in April 2021 (see attached). At that time, Limestone Water was only the sewer provider. Water service began in June 2022. [redacted] later contacted the customer service center to dispute charges totaling $2,620.72, explaining that she sold the property in 2023. She was advised to provide documentation confirming the sale date so the account can be adjusted, as there is no record of a request to discontinue service. To date, this documentation has not been received. The information may be sent to Support@limestonewateruoc.com. I have since spoken directly with [redacted]. She stated that she did not receive any bills or the welcome letter because the property did not have a physical mailbox at the time, and her mailing address is [redacted] She plans to send the closing documents to allow the account to be corrected and indicated she will address the updated balance once it has been revised.

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11/25/2025	[redacted]			MONTEREY	TN	38574	[redacted] Email: Customer did not provide information for email. [redacted] had sold the home in May 2025 while it was incomplete. She says the builder put things into the ground but it was never connected. It hadn't been lived in when she sold it. I advised her to submit the transfer of deed/documentations to our support email support@limestonewateruoc.com so that it can be attached to the account for billing review. -------- Customer called regarding billing issues for a property they sold. They stated that the property was never connected to water or sewer services, yet they were still receiving bills. Discussed the need for the customer to provide documentation proving the sale of the property to rectify the billing issue. Customer was frustrated about being held responsible for a property they no longer own. Advised on the process to send the necessary documents to resolve the issue.
1/19/2026	[redacted]			LAFOLLETTE	TN	37766	In response to [redacted] inquiries and disputes regarding the reason he was being billed for a commercials service at 5 ERUs, I have responded with the following "Dear [redacted], Thank you for reaching out to Limestone Water regarding Account [redacted]. We appreciate the opportunity to assist you. In response to your inquiry, Limestone Water revised the billing for commercial customers, transitioning to a system based on Equivalent Residential Units (ERUs). This approach reflects the average wastewater usage of a single-family home. The property located at [redacted] within the Lakeside Estates (DSH) system, is associated with a resort and can accommodate up to 30 guests. As a result, this address has been assigned 5 ERUs for wastewater service. Each ERU is billed at $55 per month, totaling $275 monthly, in addition to $2.79 monthly surcharge fee. Due to the property's guest capacity significantly exceeding a standard single-family home, the 5 ERU's assignment reflects its higher potential daily wastewater flow. Attached, you will find the Limestone Rate Schedule. Please visit www.LimestoneWaterUoc.com to view the approved tariff, located under "Regulatory Information." Best Regards, Limestone Water UOC"
1/19/2026	[redacted]			LAFOLLETTE	TN	37766	In response to [redacted] inquiry and disputing of their bills, I have responded with the following "Dear [redacted] Thank you for reaching out to Limestone Water regarding Account [redacted]. We appreciate the opportunity to assist you.Â In response to your inquiry, Limestone Water revised the billing for commercial customers, transitioning to a system based on Equivalent Residential Units (ERUs). This approach reflects the average wastewater usage of a single-family home.Â Â The property located at [redacted] within the Lakeside Estates (DSH) system, is associated with a resort and can accommodate up to 24 guests.Â As a result, this address has been assigned 4 ERUs for wastewater service. Each ERU is billed at $55 per month, totaling $220 monthly, in addition to $2.79 monthly surcharge fee. Due to the property's guest capacity significantly exceeding a standard single-family home, the 4 ERU's assignment reflects its higher potential daily wastewater flow.Â Attached, you will find the Limestone Rate Schedule. Please visitÂ www.LimestoneWaterUoc.comÂ to view the approved tariff, located under "Regulatory Information."Â Below is a break down of the ERU Calculation: The guideline estimates 50 gallons per guest, per day. 1 ERU = 300 gallons, each guest represents 0.167 ERUs (50 / 300). For an apartment house/resort with an occupancy limit of 24 guests, the ERU calculation would be 24 guests X 0.167 = 4 ERUs. Â Best Regards,Â Limestone Water UOCÂ "
1/20/2026	[redacted]			LAFOLLETTE	TN	37766	Received email; But I was being charged under $70 per month for most months. You are tripling this rate. This home goes unused most of the year, averaging about 18 rentals per year (and some of them are not a full week). I will accept a 2 ERU setting, which almost doubles the rate you were charging, but the $220 for months that it is not used is not fair. Can I talk to a supervisor and come up with a fair solution to this?
1/20/2026	[redacted]			LAFOLLETTE	TN	37766	"I was being charged under $70 per month for most months. You are tripling this rate. This home goes unused most of the year, averaging about 18 rentals per year (and some of them are not a full week). I will accept a 2 ERU setting, which almost doubles the rate you were charging, but the $220 for months that it is not used is not fair."
1/20/2026	[redacted]			LAFOLLETTE	TN	37766	Left a VM for [redacted] regarding the billing measurements for commercial accounts. I advised that ERU guidelines estimates 50 gallons per guest, per day. 1 ERU = 300 gallons, each guest represents 0.167 ERU's. For an apartment house/resort with an occupancy of 24 guests, the ERU calculation would be 24 guests X 0.167 = 4 ERU's, which he is being billed for. I have explained that due to the property's guest capacity significantly exceeding a standard single-family homes, the 4 ERU's assignment reflects its higher potential daily wastewater flow. I advised that I placed a "Rate Inquiry" log for him and to follow-up on his complaint, I have advised that he can fill out the inquiry for regulations and tariffs, available on the website, under "Contact Us."
2/10/2026	[redacted]			Counce	TN	38326	[redacted] Mobile Phone: [redacted] cx state they have 50 rooms, 1 common area with 2 lobby toilets, 1 breakroom with toilet. she is requesting billing be reviewed and adjusted accordingly, as they have been billed for 83 ERUs and that's incorrect. customer is requesting to please communicate findings and resolution via email.
2/26/2026	[redacted]			Counce	TN	38326	[redacted] [redacted] called to advice of a missapplied payment and the corrected balance on the customers account being 66.85 did explain to customer this payment was orginally applied back in june of 2025 and showed her having having a credit for which covered july august and partial of september customer stated she does not owe it and is on a fixed income I did attempt to go over the balance again with customer and explain why she owes this balance but interupted me stating she is going to call us back and disconnected the call if customer does call back please go back over billing with customer since her balance is now correct since the 66.85 was never a actual payment that was suppose to go to her account
6/5/2025	[redacted]			Savannah	TN	38372	[redacted] [redacted] Cst wants to know why his bill is so high. adv cst of amount on bill cst sys he only paid 39.30 last month adv cst his bill includes the water and sewer charge adv cst of rate increase. Cst says he will pay amount owed
6/6/2025	[redacted]			LAFOLLETTE	TN	37766	Customer called to inquire about an increase in their water bill, expressing confusion as there had been no change in usage. After verifying the account details, informed about a recent rate increase affecting all customers in the area. Explained that the new charges would reflect a higher minimum amount due to this increase. Customer acknowledged the information and confirmed understanding of the new billing amount. No further corrections needed for account information. Customer thanked for the assistance and was offered a survey at the end of the call. [redacted]
6/6/2025	[redacted]			Arrington	TN	37014	Received a call regarding an account statement showing a rate increase. Explained that the increase is due to investments in infrastructure improvements necessary for safe and reliable water services. Customer expressed disappointment, hoping for an error or alternative options. Confirmed understanding of the situation but felt there was nothing to be done. Offered additional information available on the website. Customer declined to participate in a survey and ended the call politely. [redacted]
6/6/2025	[redacted]			Nolensville	TN	37135	[redacted] Customer called to inquire about a recent increase in their monthly service charge. After verifying their account details, explained that there was a rate increase effective from a specific date. Customer acknowledged the information and mentioned they may have missed a notification letter. Expressed appreciation for the clarification and confirmed that they did not have any further questions. Ended the call on a positive note, indicating satisfaction with the assistance provided.
6/6/2025	[redacted]			Franklin	TN	37069	[redacted] called to inquire about a significant increase in their water bill without prior notification. Expressed dissatisfaction over not receiving any emails or mail regarding the rate change. Explained that the rate increase was implemented this month and that notifications were sent out, but the customer did not receive them. Worked to ensure the customer's contact preferences were updated and provided a link for the rate schedule. Customer appreciated the assistance and expressed intent to follow up via email regarding their concerns.

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6/9/2025	[redacted]			SAULSBURY	TN	38067	[redacted] Customer called regarding their water service account after their daughter was hospitalized. They were concerned about a recent increase in their bill, which they claimed they were not notified about. The customer expressed frustration over the charges and inquired about payment options. They wanted to pay by debit card but had difficulty reaching the payment line. Adv cst i can transfer him to t he pymt line and asked if it could be paid on the website. Adv cst the website can be used and is a simple method to make a pymt. Adv cst we did have a rate increase which started on June 1, 2025
6/9/2025	[redacted]			Chapel Hill	TN	37034	Customer called to inquire about an email received regarding a balance due for sewer services. Expressed confusion over the charges and a significant increase in rates. Clarified that the email was legitimate and explained the billing details, including a recent rate increase. Customer was concerned about the lack of paper billing and thought the email might be a scam. After discussing the situation, customer understood the charges better and agreed to wait for the paper bill to make the payment. Customer expressed hope that water rates would not increase similarly. [redacted]
6/9/2025	[redacted]			Savannah	TN	38372	[redacted] called to change billing address. Provided current and new address details. Expressed frustration over recent rate increases and questioned when rates would decrease again. Requested written confirmation of rate changes. Discussed the need for transparency regarding billing and service costs. Customer was skeptical about the company's promises and expressed dissatisfaction with the current situation. Offered to provide customer service contact information for further inquiries. Customer thanked for assistance but remained unconvinced about future rate reductions.
6/10/2025	[redacted]			Franklin	TN	37069	Assisted customer with inquiries regarding their rental property's water and sewer billing. Customer expressed confusion about charges from two different providers for sewer services. Explained the recent rate increase and clarified that the charges were separate. Advised the customer to contact the other provider to resolve the double billing concern. Customer seemed satisfied with the information provided and confirmed that all questions were answered. Ended the call on a positive note, wishing the customer a nice day. also advised to contact her water provider to find out about the sewer charges since she has service with us. [redacted]
6/10/2025	[redacted]			Brentwood	TN	37027	Sup call back [redacted] she wants to talk to a sup due to rate change on her water bill, limestone rate change. Grassland 3 bedroom $70.00 explained how this rate increase is based on number of rooms in customers hme customer did confirm she is in a 3 bedroom house and that matches with grasslands rate increase chart and explained how to find this information online customer asked who she needs to reach out to make a complaint about this and advised she would need to either make the complaint with us or the regulatory agency that approved the rate increase she chose to go to the agency customer thanked me for the information and ended the call
6/10/2025	[redacted]			Franklin	TN	37069	Customer called regarding a billing issue, noting that their recent bill was significantly higher than the previous month. After verifying account details, I explained that the increase was due to a change from a residential to a commercial account, which included a rate increase. The customer expressed confusion about how the account was initially set up as residential. I offered assistance with setting up a payment arrangement if needed. The customer appreciated the information and indicated they would discuss it with their team before potentially calling back to arrange payment. explained the ERU and 13 units at the $168.96 a unit . [redacted]
6/10/2025	[redacted]			Brentwood	TN	37027	Customer called to inquire about a significant increase in their water bill. Confirmed that a rate increase had been implemented and discussed previous notifications sent regarding this change. Customer expressed concern about not being informed earlier, as they were not present during prior communications. Clarified that the increase is applicable to all customers in the area and reassured the customer that rates would decrease once we regain what we lost repairing systems. Customer appreciated the responsiveness and confirmed all questions were answered.
6/11/2025	[redacted]			Savannah	TN	38372	[redacted] emailed advising he was told the rate increase was temporary and would be reduced and was told to email to ask the expected date for the rates to return to $30. -I responded apologizing for the misunderstanding and explained there is not current plan to reduce the rates. Explained reason for Rate Change and provided billing insert from website.
6/11/2025	[redacted]			Chapel Hill	TN	37034	[redacted] Customer inquiry on high bill for sewer service adv cst there was a rate increase on the service\ Nothing further Customer called with questions regarding a charge on their account. Initially, there was confusion about the amount owed, which was higher than expected. Clarified that the charge was a flat fee for sewer services. Customer expressed concern about whether this was a one-time fee or an increase. Requested further details on the charge and its implications. Placed the customer on hold to check for any potential increases in fees. Customer remained engaged but was still seeking clarity on the situation.
6/11/2025	[redacted]			Savannah	TN	38372	[redacted] Customer called to inquire about a significant increase in water usage charges. Expressed frustration over not receiving prior notification about rate increases and questioned the accuracy of the meter readings. Discussed potential reasons for the high usage, including a hot water heater issue and possible leaks. Customer requested a leak investigation and emphasized the need for advance notice before any technician visits the property. Provided information about the new rate structure. Customer left the call with a better understanding of the situation.
6/11/2025	[redacted]			Counce	TN	38326	[redacted] [redacted] Rate increase had some question about a septic. she called about her bill. i explained the rate increase and she stated she shouldn't be paying it because she has a septic. i tried to explain the rate change and she got confused which confused me a little so she would like to speak with someone just for some questions. Called [redacted] back and gave a brief break down of the rate increase advising it went effective in may and billing should reflect the increase fro the customer with the municipality she is in being Shiloh Falls and and explaining orginally being at a flat rate of 8 dollars it increased to a flat rate of 25 dollars not including taxes and surcharges customer understood and thanked me for the brief explanation and did mention she is on septic which I then asked for follow up if the system is connected to our sewer to flush once it is full customer unable to answer but stated she would find and if that is the case would be the reason why she is being charged for sewer service
6/11/2025	[redacted]			Counce	TN	38326	[redacted] called wanting an explanation for billing changes. I confirmed his information, and informed him about the Limestone rate increases. He was concerned that his usage doesn't show on the bill. I informed him that due to the new rates Limestone approved that will show from June onwards, that his account is now Unmetered, and usage will not be factored into his bill going forward. [redacted]
6/12/2025	[redacted]			Chapel Hill	TN	37034	[redacted] Customer called to inquire about an increase in their water bill and an extra charge on their payment. Explained that some locations charge fees for online payments and that there was a recent rate increase due to necessary system upgrades. Customer was initially concerned about the increase but understood the reasons provided. After clarifying the charges, the customer felt satisfied with the information and had no further questions. Thanked for the assistance and expressed appreciation for the help received.
6/12/2025	[redacted]			Savannah	TN	38372	Customer objected to being marked as behind on payments despite having paid and expressed frustration over the significant rate increase. [redacted]
6/12/2025	[redacted]			College Grov	TN	37046	[redacted] called regarding an overdue payment notice on their bill, which they believed was incorrect. After verifying account details, it was revealed that there was a rate increase that the customer was unaware of. The customer expressed frustration over not being notified of the upgrade and the slow processing of mailed payments. They plan to send an additional payment to avoid late fees. By the end of the call, the customer felt reassured after understanding the situation and confirmed they had no further questions.
6/12/2025	[redacted]			Franklin	TN	37069	[redacted] Customer called regarding a significant increase in their sewer bill, expressing frustration over the lack of communication from the company. They mentioned this was their multiple attempt to resolve the issue. The conversation revealed a rate increase and a misunderstanding regarding the billing based on usage. The customer insisted that the charges were inaccurate and requested to speak with a supervisor. A billing dispute was initiated, and the customer was informed that a supervisor would contact them within a specified timeframe. The call ended with the customer expressing their intention to escalate the matter to the public utilities commission.

Log Date	Account Number	Name	Service Address	City	State	Zip	Notes
6/12/2025	[redacted]			Franklin	TN	37069	[redacted] WANTS SUP CALL BACK DUE TO RATE INCREASE FROM $100 TO OVER $14,000. THREATS TO CONTACT DAVID JONES TN PUBLIC UTILITY COMMISSION, explained the process of how commercial billing is done for sewer account and why customer is being the charged this amount by providing a break down for the rate and erus customer is being charged for explained this Limestone Water uses a consistent method to calculate sewer charges for commercial properties based on something called Equivalent Residential Units, or ERUs. And the reason we do this is approach helps make sewer billing fair. Businesses that use the system more contribute more toward its upkeep. Customer understood my explaination but argued this is not correct reassured customer we do have a billing dispute and a billing investigation S/O as well but explained we are just following state guidelines approved by the regulatory industry as well when these changes are made
6/13/2025	[redacted]			Savannah	TN	38372	[redacted] emailed over his thoughts on the rate increase I thank you for confirming that you have doubled my water bill. So Iâ€™m paying double for the same service I had before. I know youâ€™ve spent money to improve the infrastructure. So you want me and all of your customers to subsidize your expenditures for that. I think you should keep track of that money and when you are totally reimbursed, I expect the rates to come back down to where they were before you raised them. Thatâ€™s my two cents worth. Regards: emailed advising I received this and have noted his acocunt with his thoughts.
6/16/2025	[redacted]			LAFOLLETTE	TN	37766	[redacted] Customer would like a copy of the community update for the Limestone Rate Increase that was sent out in May 2024, emailed to him. **Following email sent: Dear [redacted], Thank you for reaching out. Iâ€™m writing to provide details regarding the customer communication sent in 2024 about Limestone Water Utility Operating Companyâ€™s proposed rate adjustment. On July 16, 2024, Limestone Water filed a request with the Tennessee Public Utility Commission (TPUC) to adjust water and wastewater utility rates. This proposal reflects approximately $9.5 million in investments made to acquire, upgrade, and maintain infrastructure essential to the health and safety of communities across the state. Please note: Rates are not changing at this time. Any new rates will only take effect after the TPUC completes its review and approves the proposal. A decision is expected in early 2025, with a hearing tentatively scheduled for February 18, 2025. As part of the process, customers are invited to participate by submitting written comments or attending a public comment hearing: Public Comment Hearing Date: Thursday, January 30, 2025 Time: 3:00 â€“ 6:00 PM Location: The Lodge at Pickwick Landing State Park, Conference Room C1 Address: 120 Playground Loop, Counce, TN 38326 Case Docket Number: 24-00044 This informationâ€”including the Average Bill Comparison and Proposed Tariffs for various customer types can be viewed by visiting our website: ???? Limestone Water Regulatory Information We appreciate your engagement and the opportunity to serve your community. Sincerely, Limestone Customer Service
6/17/2025	[redacted]			Savannah	TN	38372	Customer called regarding high water and sewage charges for several irrigation meters. Expressed frustration over being charged sewage rates for meters that only serve irrigation purposes and do not connect to a sewage line. Discussed the recent rate increases and how they impact commercial accounts. Customer emphasized that only a few toilets are connected to sewage lines, while the majority of the meters are for irrigation. Requested clarification and resolution on the sewage charges, indicating willingness to escalate the issue if necessary. Agreed to put in a billing dispute for further review. Did educate cx on eru and how that is based on the plans of the account. Cx insisted they were being charged sewage for the irrigation meters that were on there as well. I was adv that it is based on how much estimated waste water is going to be produced not necessarily how many meters are there. Put in billing dispute but made no promises of changes occurring. [redacted] Cx hung up before outro.
6/17/2025	[redacted]			Franklin	TN	37069	[redacted] Customer stated that apparently mailing could not forward the payment to our address. I verified the address with her ands she said she used the stub. Customer called regarding a payment that was returned by the post office, expressing frustration over the situation. Discussed the payment process and options, including online payments. Customer was informed about recent rate increases due to infrastructure improvements. Customer was apprehensive about sending payments through the mail again due to reliability issues. Provided details on fees associated with different payment methods. A log was placed on the account to investigate the returned payment issue further. Customer appreciated the assistance and confirmed plans to make the payment online.
6/23/2025	[redacted]			Franklin	TN	37069	Customer called to inquire about recent rate changes. Expressed frustration over not receiving detailed information about the increase. After confirming the new rate, requested that the information be emailed to a new email address. Updated the email on the account and assured the customer that the request for rate increase details would be sent. Customer ended the call feeling appreciated and satisfied with the assistance provided.
6/23/2025	[redacted]			Franklin	TN	37069	[redacted] - Is requesting than another email of the Limestone rate increase be emailed to him, please.
6/24/2025	[redacted]			LAFOLLETTE	TN	37766	Customer called to inquire about a billing issue that has not been resolved for several days. Expressed frustration over a dramatic rate increase and discrepancies between the billed amount and the posted rates on the company's website. Requested to speak with a manager to address the issue immediately. Customer indicated they would escalate the matter to the public utility commission if not resolved promptly. A callback from a supervisor was promised, but the customer remained dissatisfied with the service and the time taken to address their concerns.
6/24/2025	[redacted]			LAFOLLETTE	TN	37766	[redacted] Customer called to inquire about a billing issue that has not been resolved for several days. Expressed frustration over a dramatic rate increase and discrepancies between the billed amount and the posted rates on the company's website. Requested to speak with a manager to address the issue immediately. Customer indicated they would escalate the matter to the public utility commission if not resolved promptly. A callback from a supervisor was promised, but the customer remained dissatisfied with the service and the time taken to address their concerns. Customer states rate increase does not match rate schedule customer states he is being charged for 3 units but should only be charged one one units states this house is something he lives and has used as a air bnb before In season normally 18 people and off season their are months no people are their reached out to client for additional info on this matter as well will be calling customer back
6/26/2025	[redacted]			Franklin	TN	37069	attempted call back for [redacted] customer states he would like to submit a formal complaint regarding the rate increase customer has 2 toilets and 3 sinks no showers or anything else customer feels rates should not be this high did explain to customer this was approved by the regulatory agency and every customer is following these standards rates outlines in the rate schedule on the website customer understood but still felt this was unfair and wanted to submit a complaint regarding this matter customer requested both him [redacted] and [redacted] be made contact for any follow up regarding the complaint
6/27/2025	[redacted]			Savannah	TN	38372	[redacted] cx is very upset with the limestone rate change Customer sentiment: Negative Sentiment at end of call: Neutral Outcome: Provided information about the rate increase and verified account details. Next steps: Customer to review the website for tariff details. Objections: Customer expressed frustration over the sudden rate increase and lack of communication regarding changes. Summary: Customer called to inquire about a significant increase in their water and sewage fees after the company acquisition. Expressed confusion and frustration over the lack of prior notification about the rate changes. Verified account details and discussed the new rates, which were raised due to infrastructure costs. Customer was unhappy with the perceived lack of service improvements despite the rate hike. Provided guidance on where to find more information on the company's website regarding tariffs. Ended the call with the customer feeling somewhat informed but still frustrated about the situation. Reason: To understand the reason for the increase in water and sewage fees.

Log Date	Account Number	Name	Service Address	City	State	Zip	Notes
7/1/2025	[redacted]			Counce	TN	38326	Customer called to inquire about unexpected charges on their bill after a company takeover. They were confused about a sewer surcharge and service fee that had not been present in previous bills. After some investigation, it was revealed that there was a rate increase affecting all customers in the area. The customer expressed dissatisfaction with the lack of notification regarding these changes and questioned the fairness of the flat rate billing despite having meter readings. They decided to check with neighbors to confirm if they were experiencing similar issues. [redacted]
7/10/2025	[redacted]			Savannah	TN	38372	[redacted] Customer called to inquire about a recent increase in their water bill, which they found significantly higher than usual. Clarified that the increase was due to a combination of a late payment penalty and a rise in rates that had been communicated previously. Discussed the customer's payment method and confirmed the total amount due. Customer expressed concern about the rate increase but appreciated the information provided. Ended the call on a positive note, thanking for the assistance.
7/10/2025	[redacted]			Arrrington	TN	37014	Customer called regarding a notification about a rate increase. They were on auto pay through their bank and wanted to know how to pay the difference. Discussed options for payment, including using the website or an automatic line for debit/credit payments. Customer expressed concern about late charges and penalties. Provided reassurance that no penalties were currently on the account. Customer decided to pay the difference and reset for the new amount. Ended the call on a positive note, thanking for assistance.
7/10/2025	[redacted]			Franklin	TN	37069	Customer called regarding payment issues, stating that payments were not being received despite having receipts. Discussed discrepancies in account balance and penalties for late payments. Customer was frustrated with the rate increase and the lack of notification about it. Clarified that checks were received but processing delays occurred. Offered to submit an adjustment request for penalties. Customer agreed to send a check for the current balance and expressed relief that the checks were received. Ended the call on a neutral note, acknowledging the issues but accepting the next steps.
7/14/2025	[redacted]			Franklin	TN	37069	250217 | TN-PUC | Rates | TN PUC | Since 2022 our business [redacted] has been billed approximately 50 per month for wastewater services provided by Limestone Water. Our bill for May was 14023!!! I first called Limestone on Monday 6 9 and spoke to CSR who said they would have a supervisor call me. No one called. I called again on 6 12 and was advised that as part of a rate increase our business went from being billed based on 1 ERU to 83 ERU and that this was a ratio that was set by the TPUC . |
7/17/2025	[redacted]			Franklin	TN	37069	Customer called to inquire about sewer service and recent rate increase. Confirmed that the company provides sewer service for her address. Discussed the recent rate increase and automatic payment details. Customer expressed concern about future rate increases if more businesses connect to the sewer system. Informed that any significant changes would be communicated via mail a year in advance. Customer satisfied with the information provided and ended the call.
7/17/2025	[redacted]			Savannah	TN	38372	Spoke [redacted]. Customer called to update their billing address due to issues with mail forwarding. Verified account details and successfully updated the billing address. Customer expressed frustration about a recent rate increase and mentioned writing to the commission regarding it. Despite the concern about the rate, the customer was satisfied with the address update and ended the call on a neutral note, thanking for the assistance.
8/12/2025	[redacted]			Savannah	TN	38372	[redacted] Customer says he has low water pressure, he checked with his neighbor and they also have low water pressure. S/O processed for low water pressure Customer reported low water pressure at their residence, affecting all floors. Checked with neighbors, who confirmed similar issues. Customer verified no leaks at their property. Expressed frustration over recent rate increases and current service problems. Requested follow-up via email regarding the resolution timeline. A work order was created to address the low water pressure issue, and the customer was informed that a crew would be dispatched soon. Customer thanked for assistance and expressed hope for a quick resolution.
8/27/2025	[redacted]			Counce	TN	38326	Customer called to inquire about discrepancies in billing related to auto-pay. Expressed frustration over undisclosed processing fees that were not clearly stated on invoices. Discussed recent rate increases and how they affect monthly charges. Customer emphasized the need for transparency in billing practices, particularly regarding additional fees. Acknowledged that while auto-pay is convenient, the lack of clear information on invoices is misleading. Customer appreciated the assistance but highlighted the importance of clearer communication regarding fees. Ended the call with no further questions [redacted]
9/26/2025	[redacted]			Savannah	TN	38372	[redacted] customer has no water adv because of the repair work Per ops there is an active leak in TN - Aqua. They're on scene working to get it repaired. checking the irrigation account [redacted] Customer called regarding a water outage and expressed frustration over being charged the same rate for irrigation and regular water services. Explained that there is an active leak in the area causing the outage. Customer was dissatisfied with the billing structure, believing they should not be charged the same rate for services that do not incur sewer fees. Clarified that charges are based on usage, but customer felt misled about the rate increase and lack of notification. Ended the call with no further questions.
9/26/2025	[redacted]			Savannah	TN	38372	[redacted] customer has no water adv because of the repair work Per ops there is an active leak in TN - Aqua. They're on scene working to get it repaired. checking the irrigation account [redacted] Customer called regarding a water outage and expressed frustration over being charged the same rate for irrigation and regular water services. Explained that there is an active leak in the area causing the outage. Customer was dissatisfied with the billing structure, believing they should not be charged the same rate for services that do not incur sewer fees. Clarified that charges are based on usage, but customer felt misled about the rate increase and lack of notification. Ended the call with no further questions.
12/29/2025	[redacted]			Nolensville	TN	37135	250380 | TN-PUC | Billing Dispute | TPUC | When Limestone held a zoom call about their last rate increase approval I asked why it is fair to charge by bathroom versus people living in a residence. They said they realized it was unfair and would address. Well they havent addressed and wont give anyone an answer except that it hasnt been brought up. Im 74 and my wife is 69 we live in a home with 3 baths and our bill is 79.54 per month. Our sewer bill is higher than our water bill except in the summer with irrigation running. |
1/12/2026	[redacted]			Franklin	TN	37069	[redacted] Customer called to inquire about a potential rate increase for the upcoming year. Verified service address and contact information. Confirmed that there is currently no rate increase. Provided the customer with the monthly amount they are being charged. Customer expressed appreciation for the information provided. Ended the call by informing the customer about a brief survey that would follow the call.
2/2/2026	[redacted]			Counce	TN	38326	Bill investigation, they are put in as having 83 rooms but they only have 50 rooms and have had only 50 rooms can we have it looked at and conform there is only 50 room and have the acct updated to be billed for 50 rooms and not 83 rooms. [redacted] did advice that they was charged for 83 when they only have the 50. ***---- Customer called regarding a significant increase in their sewer service bill. Initially charged based on usage, they were switched to a flat rate, which they found confusing and excessive. The customer expressed concern over being billed for more rooms than they actually have. After reviewing the account, I explained the reasons for the rate increase and initiated a service order to confirm the actual number of rooms. I assured the customer that once confirmed, we could investigate potential billing adjustments. The call ended with the customer feeling somewhat reassured but still concerned about the billing issue.

Public 1-6

Commercial Bill Detail

Account Number	Account Name	May 2025 Invoice	June 2025 Invoice	Proposed Phase 2 Invoice
[redacted]		$ 44.50	$ 6,085.35	$ 15,463.58
[redacted]		$ 44.50	$ 3,550.95	$ 8,985.59
[redacted]		$ 72.93	$ 1,837.59	$ 5,409.38
[redacted]		$ 44.50	$ 14,026.47	$ 4,179.35
[redacted]		$ 44.50	$ 171.75	$ 3,134.51
[redacted]		$ 44.50	$ 2,199.27	$ 2,716.57
[redacted]		$ 912.46	$ 4,617.59	$ 2,458.81
[redacted]		$ 378.21	$ 1,570.46	$ 1,541.00
[redacted]		$ 269.25	$ 1,497.97	$ 1,311.37
[redacted]		$ 42.00	$ 132.79	$ 626.90
[redacted]		$ 44.50	$ 509.67	$ 626.90
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 44.50	$ 509.67	$ 417.93
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 44.50	$ 340.71	$ 417.93
[redacted]		$ 37.00	$ 337.92	$ 417.93
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 44.50	$ 171.75	$ 417.93
[redacted]		$ 68.37	$ 222.79	$ 345.58
[redacted]		$ 112.76	$ 447.59	$ 327.84
[redacted]		$ 68.37	$ 222.79	$ 287.98
[redacted]		$ 68.37	$ 112.79	$ 287.98
[redacted]		$ 68.37	$ 112.79	$ 287.98
[redacted]		$ 68.37	$ 277.79	$ 287.98
[redacted]		$ 68.37	$ 222.79	$ 287.98
[redacted]		$ 68.37	$ 167.79	$ 287.98
[redacted]		$ 68.37	$ 222.79	$ 287.98
[redacted]		$ 68.37	$ 112.79	$ 287.98
[redacted]		$ 68.37	$ 112.79	$ 287.98
[redacted]		$ 68.37	$ 180.46	$ 287.98
[redacted]		$ 68.37	$ 277.79	$ 287.98
[redacted]		$ 68.37	$ 277.79	$ 287.98
[redacted]		$ 68.37	$ 167.79	$ 230.39
[redacted]		$ 68.37	$ 167.79	$ 230.39
[redacted]		$ 68.37	$ 222.79	$ 230.39
[redacted]		$ 68.37	$ 277.79	$ 230.39
[redacted]		$ 68.37	$ 112.79	$ 230.39
[redacted]		$ 68.37	$ 222.79	$ 230.39
[redacted]		$ 68.37	$ 57.79	$ 230.39
[redacted]		$ 68.37	$ 112.79	$ 230.39
[redacted]		$ 68.37	$ 112.79	$ 230.39
[redacted]		$ 68.37	$ 222.79	$ 230.39
[redacted]		$ 68.37	$ 222.79	$ 230.39
[redacted]		$ 68.37	$ 112.79	$ 230.39
[redacted]		$ 68.37	$ 167.79	$ 230.39
[redacted]		$ 68.37	$ 222.79	$ 230.39
[redacted]		$ 68.37	$ 167.79	$ 230.39
[redacted]		$ 68.37	$ 222.79	$ 230.39
[redacted]		$ 52.42	$ 55.00	$ 230.39
[redacted]		$ 55.25	$ 75.00	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97

Account Number	Account Name	May 2025 Invoice	June 2025 Invoice	Proposed Phase 2 Invoice
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 44.50	$ 171.75	$ 208.97
[redacted]		$ 37.00	$ 171.75	$ 208.97
[redacted]		$ 68.37	$ 167.79	$ 172.79
[redacted]		$ 68.37	$ 57.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 167.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 112.79	$ 172.79
[redacted]		$ 68.37	$ 57.79	$ 172.79
[redacted]		$ 68.37	$ 167.79	$ 172.79
[redacted]		$ 68.37	$ 277.79	$ 172.79
[redacted]		$ 8.90	$ 27.79	$ 163.92
[redacted]		$ 8.90	$ 27.79	$ 163.92
[redacted]		$ 11.35	$ 27.79	$ 163.92
[redacted]		$ 132.85	$ 27.79	$ 163.92
[redacted]		$ 15.24	$ 27.79	$ 163.92
[redacted]		$ 68.37	$ 112.79	$ 115.19
[redacted]		$ 68.37	$ 277.79	$ 115.19
[redacted]		$ 68.37	$ 57.79	$ 57.60
[redacted]		$ 68.37	$ 57.79	$ 57.60
[redacted]		$ 52.42	$ 57.79	$ 57.60
[redacted]		$ 56.73	$ 84.13	$ 46.70
[redacted]		$ 39.84	$ 72.43	$ 46.70
[redacted]		$ 39.84	$ 202.65	$ 46.70

Public Updated 1-18

Design Basis Support

Route/Seq	Account Number	Acct Status	Name	Service Address	Facility Type	Design Basis	Units (Design Basis)	Service	Service Type	Status	ERU	Address Type	Line Size	Municipality
TN-SF-1/ 0	[redacted]				Hotel	Guests	500	TN-Shiloh Falls Sewer	Sewer	Active	83	Commercial	Unknown	TN-Shiloh Falls
TN-UNM/ 1	[redacted]				Country Club	Guests	250	TN-CC Comm Sewer	Sewer	Active	83	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				w cafeteria, gym showers	Student	441.5	TN-CC Comm Sewer	Sewer	Active	37	Commercial		TN-Grasslands
TN-AQ-1/ 0	[redacted]				Country Club	Guests	100	TN-Aqua Sewer	Sewer	Active	33	Commercial	1"	TN-Aqua
TN-SF-1/ 0	[redacted]				Country Club	Guests	100	TN-Shiloh Falls Sewer	Sewer	Active	33	Commercial	Unknown	TN-Shiloh Falls
TN-UNM/ 1	[redacted]				w cafeteria, gym showers	Student	259	TN-CC Comm Sewer	Sewer	Active	22	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Hospital Mental	Bed	40	TN-CC Comm Sewer	Sewer	Active	13	Commercial		TN-Grasslands
TN-SF-1/ 0	[redacted]				Apartment House	Person	50	TN-Shiloh Falls Sewer	Sewer	Active	8	Commercial	Unknown	TN-Shiloh Falls
TN-SF-1/ 0	[redacted]				Hotel	Guests	50	TN-Shiloh Falls Sewer	Sewer	Active	8	Commercial	Unknown	TN-Shiloh Falls
TN-DSH-1/ 0	[redacted]				Apartment House	Person	34	TN-DSH Commercial Sewer	Water	Active	6	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	30	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	30	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	30	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	30	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	30	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	29	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	28	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	28	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	28	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	28	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	28	TN-DSH Commercial Sewer	Sewer	Active	5	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	26	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	26	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	26	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	26	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	24	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	22	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	22	TN-DSH Commercial Sewer	Sewer	Active	4	Commercial	Unknown	TN-DSH
TN-UNM/ 1	[redacted]				Dormitory/Bunkhouse	Person	25	TN-CC Comm Sewer	Sewer	Active	3	Commercial		TN-Grasslands
TN-DSH-1/ 0	[redacted]				Apartment House	Person	20	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	20	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	20	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	18	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	18	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	18	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-UNM/ 1	[redacted]				w cafeteria only	Student	60	TN-CC Comm Sewer	Sewer	Active	3	Commercial		TN-Grasslands
TN-DSH-1/ 0	[redacted]				Apartment House	Person	16	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	16	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	16	TN-DSH Commercial Sewer	Sewer	Active	3	Commercial	Unknown	TN-DSH
TN-UNM/ 0	[redacted]				Office	Employee	60	TN-Grass 1-2bed Sewer	Sewer	Active	3	Commercial		TN-Grasslands
TN-DSH-1/ 0	[redacted]				Apartment House	Person	14	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	14	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	14	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-UNM/ 1	[redacted]				Industrial Building	Employee	50	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	12	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-UNM/ 1	[redacted]				Church	Seat	200	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	40	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Department Store	Toilet Room	1	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Department Store	Toilet Room	1	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Department Store	Toilet Room	1	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Department Store	Toilet Room	1	TN-CC Comm Sewer	Sewer	Active	2	Commercial		TN-Grasslands
TN-DSH-1/ 0	[redacted]				Apartment House	Person	10	TN-DSH Commercial Sewer	Sewer	Active	2	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	8	TN-DSH Commercial Sewer	Sewer	Active	1	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	8	TN-DSH Commercial Sewer	Sewer	Active	1	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	8	TN-DSH Commercial Sewer	Sewer	Active	1	Commercial	Unknown	TN-DSH
TN-DSH-1/ 0	[redacted]				Apartment House	Person	8	TN-DSH Commercial Sewer	Sewer	Active	1	Commercial	Unknown	TN-DSH
TN-SF-1/ 0	[redacted]				Swimming Pool	Employee	10	TN-Shiloh Falls Sewer	Sewer	Active	1	Commercial	Unknown	TN-Shiloh Falls
TN-SF-1/ 0	[redacted]				Office	Employee	2	TN-Shiloh Falls Sewer	Sewer	Active	1	Commercial	Unknown	TN-Shiloh Falls
TN-SF-1/ 0	[redacted]				Office	Employee	10	TN-Shiloh Falls Sewer	Sewer	Active	1	Commercial	Unknown	TN-Shiloh Falls
TN-SF-1/ 0	[redacted]				Shopping Center	Employee	8	TN-Shiloh Falls Sewer	Water	Active	1	Commercial	Unknown	TN-Shiloh Falls
TN-SF-1/ 0	[redacted]				Shopping Center	Employee	10	TN-Shiloh Falls Sewer	Sewer	Active	1	Commercial	Unknown	TN-Shiloh Falls
TN-UNM/ 0	[redacted]				Office	Employee	8	TN-Grass 1-2bed Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-AQ-1/ 315	[redacted]				Swimming Pool	Employee	10	TN-Aqua Sewer	Sewer	Active	1	Commercial	5/8"	TN-Aqua
TN-UNM/ 1	[redacted]				Shopping Center	Employee	20	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	10	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Assembly Hall	Seat	30	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Visitor Center	Visitor	10	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Automobile Service Station	Employee	3	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	2	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	7	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	3	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Short Order	Customer	30	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Automobile Service Station	Employee	12	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Automobile Service Station	Employee	6	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	10	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	12	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	4	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	7	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	20	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	4	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Short Order	Customer	15	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	3	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Short Order	Customer	6	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Office	Employee	12	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Church	Seat	100	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Church	Seat	100	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Shopping Center	Employee	4	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands
TN-UNM/ 1	[redacted]				Visitor Center	Visitor	30	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Hardeman Springs
TN-UNM/ 1	[redacted]				Public Lavatory	User	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Hideaway
TN-UNM/ 1	[redacted]				Public Lavatory	User	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Hideaway
TN-UNM/ 1	[redacted]				Bar	Employee	3	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Hideaway
TN-UNM/ 1	[redacted]				Store, resort	Employee	5	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Hideaway
TN-UNM/ 1	[redacted]				Industrial Building	Employee	2	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Hideaway
TN-UNM/ 1	[redacted]				Public Lavatory	User	10	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Arrington
TN-AQ-1/ 1	[redacted]				Office	Employee	10	TN-Aqua Sewer	Sewer	Active	1	Commercial	Unknown	TN-Aqua
TN-UNM/ 0	[redacted]				Assembly Hall	Seat	50	TN-CC Comm Sewer	Sewer	Active	1	Commercial		TN-Grasslands

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

Public 1-9

TN Bill Analysis

TN-Limestone

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

TN-Limestone
June - December 2025

	Billed Revenue						
Water	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Candlewood	$5,863	$5,860	$5,875	$5,818	$5,938	$5,850	$5,874
Aqua Utilities- 5/8"	$16,139	$18,023	$18,320	$19,413	$19,520	$17,998	$16,292
Aqua Utilities- 3/4"	$1,019	$1,151	$926	$1,211	$1,230	$1,073	$871
Aqua Utilities- 1"	$413	$245	$353	$366	$209	$205	$390
Aqua Utilities- 1 1/2"	$39	$106	$266	$318	$259	$295	$101
Aqua Utilities- 2"	$52	$47	$38	$37	$3	$35	$65
Aqua Utilities- unknown	$744	$924	$749	$832	$835	$757	$719
Total Water	$24,268	$26,354	$26,527	$27,995	$27,993	$26,213	$24,311
Sewer							
Aqua Utilities-Residential	$15,974	$12,141	$14,076	$14,048	$14,033	$14,042	$14,136
Aqua Utilities-Commercial	$1,303	$1,303	$1,303	$1,303	$1,303	$1,268	$1,268
Cartwright - Grassland - Comm 1-2 Bedroom	$0	$0	$0	$0	$0	$0	$0
Cartwright - Grassland - Res 1-2 Bedroom	$2,455	$2,526	$2,564	$2,627	$2,306	$2,283	$2,254
Cartwright - Grassland - Res 3 Bedroom	$20,387	$20,310	$20,265	$20,301	$20,283	$20,041	$20,341
Cartwright - Grassland - Res 4 Bedroom	$14,802	$14,891	$14,958	$14,673	$14,796	$14,733	$14,813
Cartwright - Grassland - Res 5 Bedroom	$622	$622	$626	$626	$622	$622	$643
Cartwright - Commercial	$34,965	$36,196	$35,807	-$4,250	$19,662	$24,240	$24,363
Cartwright - Arrington/Hardeman/Hideaway -Res	$34,062	$33,699	$34,013	$34,065	$33,555	$34,225	$34,378
Chapel Woods	$6,064	$6,101	$6,162	$6,176	$6,100	$6,139	$6,116
Shiloh Falls - Residential	$9,000	$8,966	$8,887	$8,958	$8,984	$8,974	$8,923
Shiloh Falls - Commercial	$7,356	$7,464	$7,464	$7,464	$7,464	$7,464	$7,464
Lakeside Estates (DSH) - Commercial	$7,739	$7,825	$7,462	$7,663	$7,663	$7,663	$7,663
Lakeside Estates (DSH) - Residential	$345	$348	$350	$352	$478	$427	$465
Total Sewer	$155,075	$152,391	$153,938	$114,007	$137,250	$142,122	$142,830

	Payments Received						
Water	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Candlewood	-$6,655	-$5,034	-$5,261	-$5,260	-$5,304	-$5,013	-$4,737
Aqua Utilities- 5/8"	-$16,068	-$16,924	-$17,977	-$19,669	-$18,513	-$17,382	-$16,899
Aqua Utilities- 3/4"	-$941	-$1,064	-$1,321	-$1,147	-$1,061	-$1,062	-$938
Aqua Utilities- 1"	-$378	-$338	-$319	-$515	$0	-$229	-$40
Aqua Utilities- 1 1/2"	-$39	-$47	-$212	-$256	-$259	-$237	-$34
Aqua Utilities- 2"	-$149	$0	-$161	-$73	$0	$0	-$101
Aqua Utilities- unknown	-$675	-$1,010	-$750	-$810	-$803	-$827	-$752
Total Water	-$24,905	-$24,416	-$26,001	-$27,731	-$25,940	-$24,749	-$23,501
Sewer							
Aqua Utilities-Residential	-$14,992	-$12,913	-$11,600	-$13,376	-$12,949	-$12,455	-$13,268
Aqua Utilities-Commercial	-$95	-$1,360	-$1,223	-$2,482	-$340	-$1,057	-$85
Cartwright - Grassland - Comm 1-2 Bedroom	$0	$0	$0	$0	$0	$0	$0
Cartwright - Grassland - Res 1-2 Bedroom	-$2,092	-$2,122	-$2,133	-$2,495	-$2,163	-$1,952	-$1,953
Cartwright - Grassland - Res 3 Bedroom	-$19,003	-$17,863	-$19,057	-$19,977	-$18,256	-$17,455	-$19,552
Cartwright - Grassland - Res 4 Bedroom	-$13,849	-$13,266	-$14,120	-$16,295	-$14,845	-$12,542	-$13,902
Cartwright - Grassland - Res 5 Bedroom	-$600	-$525	-$600	-$675	-$600	-$600	-$454
Cartwright - Commercial	-$8,821	-$29,204	-$23,180	-$22,550	-$21,745	-$39,323	-$23,720
Cartwright - Arrington/Hardeman/Hideaway -Res	-$32,707	-$31,035	-$31,550	-$31,789	-$32,429	-$31,308	-$32,252
Chapel Woods	-$5,120	-$4,209	-$4,345	-$5,058	-$5,132	-$4,241	-$5,025
Shiloh Falls - Residential	-$7,828	-$7,463	-$7,591	-$7,020	-$7,423	-$7,579	-$7,133
Shiloh Falls - Commercial	-$5,329	-$5,060	-$5,710	-$5,285	-$5,260	-$5,285	-$5,260
Lakeside Estates (DSH) - Commercial	-$6,271	-$6,472	-$8,130	-$6,675	-$7,012	-$6,202	-$7,439
Lakeside Estates (DSH) - Residential	-$306	-$470	-$330	-$330	-$330	-$476	-$495
Total Sewer	-$117,013	-$131,962	-$129,569	-$134,005	-$128,484	-$140,475	-$130,537

Sum of Charges		Month								
Muncipality	Meter Size	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-Aqua	5/8"	16,016	17,849	18,154	19,345	19,404	17,945	16,128	124,841	Aqua Utilities- 5/8"
TN-Aqua	5/8" X 3/4"	44	53	34	43	34	0	34	242	Aqua Utilities- 5/8"
TN-Aqua	3/4"	1,004	1,143	918	1,209	1,225	1,091	857	7,447	Aqua Utilities- 3/4"
TN-Aqua	1"	413	245	353	366	209	205	390	2,180	Aqua Utilities- 1"
TN-Aqua	1 1/2"	39	47	212	256	259	237	34	1,083	Aqua Utilities- 1 1/2"
TN-Aqua	2"	50	42	34	34	0	35	61	256	Aqua Utilities- 2"
TN-Aqua	Unknown	735	917	745	826	835	755	714	5,527	Aqua Utilities- unknown
TN-Candlewood	0	5,797	5,799	5,795	5,751	5,863	5,792	5,796	40,592	Candlewood
Grand Total		**24,096**	**26,094**	**26,244**	**27,830**	**27,828**	**26,060**	**24,015**	**182,168**	

Sum of Receipts		Month							
Muncipality	Meter Size	20256	20257	20258	20259	202510	202511	202512	Grand Total
TN-Aqua	5/8"	(16,068)	(16,924)	(17,977)	(19,669)	(18,513)	(17,382)	(16,899)	(123,432)
TN-Aqua	5/8" X 3/4"	0	0	0	0	0	0	0	0
TN-Aqua	3/4"	(941)	(1,064)	(1,321)	(1,147)	(1,061)	(1,062)	(938)	(7,535)
TN-Aqua	1"	(378)	(338)	(319)	(515)	0	(229)	(40)	(1,819)
TN-Aqua	1 1/2"	(39)	(47)	(212)	(256)	(259)	(237)	(34)	(1,083)
TN-Aqua	2"	(149)	0	(161)	(73)	0	0	(101)	(483)
TN-Aqua	Unknown	(675)	(1,010)	(750)	(810)	(803)	(827)	(752)	(5,628)
TN-Candlewood	0	(6,655)	(5,034)	(5,261)	(5,260)	(5,304)	(5,013)	(4,737)	(37,263)
Grand Total		**(24,905)**	**(24,416)**	**(26,001)**	**(27,731)**	**(25,940)**	**(24,749)**	**(23,501)**	**(177,243)**

Sum of Adjustments		Month								
Muncipality	Meter Size	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-Aqua	5/8"	0	0	0	-57	0	-31	0	-88	Aqua Utilities- 5/8"
TN-Aqua	5/8" X 3/4"	0	0	0	0	0	0	0	0	Aqua Utilities- 5/8"
TN-Aqua	3/4"	0	0	0	0	0	-31	0	-31	Aqua Utilities- 3/4"
TN-Aqua	1"	0	0	0	0	0	0	0	0	Aqua Utilities- 1"
TN-Aqua	1 1/2"	0	0	0	0	0	0	0	0	Aqua Utilities- 1 1/2"
TN-Aqua	2"	0	0	0	0	0	0	0	0	Aqua Utilities- 2"
TN-Aqua	Unknown	0	0	0	0	0	0	0	0	Aqua Utilities- unknown
TN-Candlewood	0	0	0	0	0	0	-3	0	-3	Candlewood
Grand Total		**0**	**0**	**0**	**-57**	**0**	**-65**	**0**	**-122**	

Sum of Penalties		Month								
Muncipality	Meter Size	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-Aqua	5/8"	$78	$118	$130	$80	$80	$83	$130	$700	Aqua Utilities- 5/8"
TN-Aqua	5/8" X 3/4"	$1	$2	$3	$2	$2	$2	$0	$11	Aqua Utilities- 5/8"
TN-Aqua	3/4"	$15	$7	$8	$2	$5	$13	$14	$63	Aqua Utilities- 3/4"
TN-Aqua	1 1/2"	$0	$0	$0	$0	$0	$0	$0	$0	Aqua Utilities- 1"
TN-Aqua	1"	$0	$59	$54	$62	$0	$58	$67	$300	Aqua Utilities- 1 1/2"
TN-Aqua	2"	$2	$5	$4	$3	$3	$0	$3	$21	Aqua Utilities- 2"
TN-Aqua	Unknown	$10	$7	$4	$6	$0	$2	$5	$34	Aqua Utilities- unknown
TN-Candlewood	0	$66	$61	$80	$67	$75	$60	$78	$487	Candlewood
Grand Total		**$172**	**$260**	**$282**	**$222**	**$165**	**$218**	**$297**	**$1,616**	

$183,662.33

#REF!

Excludes : Laurel Creek, Genesis, The Bluffs, Riverston

Sum of Charges	Month								
Service	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-Aqua Commercial Sewer	1,295	1,295	1,295	1,295	1,295	1,260	1,260	8,995	Aqua Utilities-Commercial
TN-Aqua Sewer	14,968	16,599	13,067	13,047	13,033	13,091	13,129	96,933	Aqua Utilities-Residential
TN-CC Comm Sewer	34,806	34,806	34,806	34,806	25,428	24,082	24,161	212,895	Cartwright - Commercial
TN-CC Res Sewer	32,715	32,320	32,618	32,703	32,219	32,980	32,984	228,537	Cartwright - Arrington/Hardeman/Hideaway -Res
TN-Chapel Woods Sewer	5,616	5,640	5,680	5,697	5,630	5,667	5,636	39,567	Chapel Woods
TN-DSH Commercial Sewer	7,601	7,689	7,333	7,535	7,535	7,535	7,535	52,763	Lakeside Estates (DSH) - Commercial
TN-DSH Residential Sewer	330	330	330	330	456	405	440	2,621	Lakeside Estates (DSH) - Residential
TN-Grass 1-2bed Sewer	2,344	2,403	2,438	2,496	2,198	2,178	2,145	16,201	Cartwright - Grassland - Res 1-2 Bedroom
TN-Grass 3bed Sewer	19,537	19,424	19,339	19,397	19,423	19,362	19,413	135,894	Cartwright - Grassland - Res 3 Bedroom
TN-Grass 4bed Sewer	14,213	14,302	14,318	14,090	14,192	14,153	14,175	99,441	Cartwright - Grassland - Res 4 Bedroom
TN-Grass 5bed Sewer	600	600	600	600	600	600	620	4,220	Cartwright - Grassland - Res 5 Bedroom
TN-Shiloh Falls Commercial Sewer	8,384	7,339	7,339	7,339	7,339	7,339	7,339	52,419	Shiloh Falls - Commercial
TN-Shiloh Falls Sewer	8,112	8,078	8,045	8,071	8,100	8,091	8,045	56,541	Shiloh Falls - Residential
Grand Total	**150,520**	**150,825**	**147,206**	**147,405**	**137,447**	**136,742**	**136,882**	**1,007,028**	

Sum of Receipts	Month							
Service	20256	20257	20258	20259	202510	202511	202512	Grand Total
TN-Aqua Commercial Sewer	-94.5	-1359.9	-1223.06	-2481.62	-339.61	-1057.04	-85.35	-6641.08
TN-Aqua Sewer	-14991.73	-12912.97	-11600.05	-13375.66	-12949.47	-12455.27	-13268.39	-91553.54
TN-CC Comm Sewer	-8821.28	-29204.07	-23179.61	-22549.89	-21745.08	-39322.83	-23719.54	-168542.3
TN-CC Res Sewer	-32707.31	-31034.94	-31550.22	-31788.96	-32428.57	-31308.11	-32251.92	-223070.03
TN-Chapel Woods Sewer	-5120.27	-4209.46	-4345.3	-5057.68	-5132.23	-4241.36	-5025.26	-33131.56
TN-DSH Commercial Sewer	-6270.94	-6471.98	-8130.43	-6675.47	-7012.32	-6202.05	-7438.66	-48201.85
TN-DSH Residential Sewer	-305.73	-470.36	-330	-330	-330	-475.98	-495	-2737.07
TN-Grass 1-2bed Sewer	-2091.59	-2121.71	-2133.21	-2494.93	-2163.41	-1952.16	-1953.25	-14910.26
TN-Grass 3bed Sewer	-19002.75	-17863.03	-19056.71	-19976.63	-18255.93	-17454.71	-19551.74	-131161.5
TN-Grass 4bed Sewer	-13849.42	-13266.35	-14119.61	-16294.56	-14845.04	-12541.57	-13901.62	-98818.17
TN-Grass 5bed Sewer	-600	-525	-600	-675	-600	-600	-453.75	-4053.75
TN-Shiloh Falls Commercial Sewer	-5328.85	-5059.6	-5710.14	-5284.79	-5259.76	-5284.79	-5259.76	-37187.69
TN-Shiloh Falls Sewer	-7828.41	-7463.1	-7590.92	-7019.89	-7422.51	-7578.84	-7132.82	-52036.49
Grand Total	**-117012.78**	**-131962.47**	**-129569.26**	**-134005.08**	**-128483.93**	**-140474.71**	**-130537.06**	**-912045.29**

Sum of Adjustments	Month								
Service	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-Aqua Commercial Sewer	0	0	0	0	0	0	0	0	Aqua Utilities-Commercial
TN-Aqua Sewer	0	-5,475	0	0	0	-54	0	-5,528	Aqua Utilities-Residential
TN-CC Comm Sewer	0	0	0	-37,847	-6,629	0	0	-44,476	Cartwright - Commercial
TN-CC Comm Sewer - Penalty	0	0	0	-2,111	0	-228	0	-2,340	Cartwright - Commercial
TN-CC Res Sewer	0	0	0	0	0	-75	0	-75	Cartwright - Arrington/Hardeman/Hideaway -Res
TN-CC Res Sewer - Penalty	0	0	0	0	0	-33	-4	-36	Cartwright - Arrington/Hardeman/Hideaway -Res
TN-Grass 1-2bed Sewer - Penalty	0	0	-3	0	0	0	0	-3	Cartwright - Grassland - Res 1-2 Bedroom
TN-Grass 3bed Sewer	0	0	0	0	0	-191	0	-191	Cartwright - Grassland - Res 3 Bedroom
TN-Grass 3bed Sewer - Penalty	0	0	-4	0	0	-7	0	-11	Cartwright - Grassland - Res 3 Bedroom
TN-Grass 4bed Sewer - Penalty	0	0	0	-7	0	0	0	-7	Cartwright - Grassland - Res 4 Bedroom
TN-Sewer Surcharge	-6	0	0	-4	0	-12	0	-21	Cartwright - Grassland - Res 3 Bedroom
TN-Shiloh Falls Commercial Sewer	-1,045	0	0	0	0	0	0	-1,045	Shiloh Falls - Commercial
TN-Shiloh Falls Sewer	0	0	-42	0	0	0	0	-42	Shiloh Falls - Residential
Grand Total	**-1,050**	**-5,475**	**-48**	**-39,969**	**-6,629**	**-600**	**-4**	**-53,775**	

Sum of Penalties	Month								
Service	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-CC Comm Sewer - Penalty	17	1,248	859	761	718	245	59	3,906	Cartwright - Commercial
TN-CC Res Sewer - Penalty	144	186	195	165	158	155	195	1,198	Cartwright - Arrington/Hardeman/Hideaway -Res
TN-Chapel Woods Sewer - Penalty	57	67	89	84	80	80	89	546	Chapel Woods
TN-DSH Residential Sewer - Penalty	2	3					3	7	Lakeside Estates (DSH) - Residential
TN-Grass 1-2bed Sewer - Penalty	13	26	31	29	20	17	23	158	Cartwright - Grassland - Res 1-2 Bedroom
TN-Grass 3bed Sewer - Penalty	77	111	159	134	86	117	155	840	Cartwright - Grassland - Res 3 Bedroom
TN-Grass 4bed Sewer - Penalty	61	57	108	66	76	54	111	532	Cartwright - Grassland - Res 4 Bedroom
TN-Grass 5bed Sewer - Penalty			4	4				8	Cartwright - Grassland - Res 5 Bedroom
TN-Shiloh Falls Commercial Sewer - Penalty		114	114	114	114	114	114	684	Shiloh Falls - Commercial
Grand Total	**369**	**1,812**	**1,558**	**1,358**	**1,251**	**781**	**749**	**7,879**	

Service	TN-Sewer Surcharge

Sum of Charges	Month								
Surcharge - Service	20256	20257	20258	20259	202510	202511	202512	Grand Total	
TN-Aqua Commercial Sewer	8	8	8	8	8	8	8	59	Aqua Utilities-Commercial
TN-Aqua Sewer	1,006	1,016	1,009	1,001	1,000	1,005	1,007	7,045	Aqua Utilities-Residential
TN-CC Comm Sewer	142	142	142	142	144	141	142	996	Cartwright - Commercial
TN-CC Res Sewer	1,202	1,193	1,200	1,197	1,179	1,197	1,203	8,372	Cartwright - Arrington/Hardeman/Hideaway -Res
TN-Chapel Woods Sewer	392	393	393	395	390	392	390	2,746	Chapel Woods
TN-DSH Commercial Sewer	138	136	128	128	128	128	128	916	Lakeside Estates (DSH) - Commercial
TN-DSH Residential Sewer	14	15	20	22	22	22	22	138	Lakeside Estates (DSH) - Residential
TN-Grass 1-2bed Sewer	98	98	99	102	89	88	86	659	Cartwright - Grassland - Res 1-2 Bedroom
TN-Grass 3bed Sewer	779	774	771	773	774	772	774	5,416	Cartwright - Grassland - Res 3 Bedroom
TN-Grass 4bed Sewer	529	532	533	524	528	526	527	3,699	Cartwright - Grassland - Res 4 Bedroom
TN-Grass 5bed Sewer	22	22	22	22	22	22	23	157	Cartwright - Grassland - Res 5 Bedroom
TN-Shiloh Falls Commercial Sewer	17	11	11	11	11	11	11	84	Shiloh Falls - Commercial
TN-Shiloh Falls Sewer	889	888	884	887	884	883	878	6,193	Shiloh Falls - Residential
Grand Total	**5,236**	**5,229**	**5,222**	**5,213**	**5,180**	**5,197**	**5,203**	**36,480**	

155,075	152,391	153,938	114,007	137,250	142,122	142,830	997,612

Muncipality	(Multiple Items)

Sum of Adjustments	Month							
Service	202510	202511	202512	20256	20257	20258	20259	Grand Total
TN-Aqua Commercial Sewer	-	-	-	-	(0)	-	-	(0)
TN-Aqua Sewer	-	(54)	-	-	(5,475)	-	-	(5,528)
TN-CC Comm Sewer	(6,629)	-	-	-	-	-	(37,847)	(44,476)
TN-CC Comm Sewer - Penalty	-	(228)	-	-	-	-	(2,111)	(2,340)
TN-CC Res Sewer	-	(75)	-	-	-	-	-	(75)
TN-CC Res Sewer - Penalty	-	(33)	(4)	-	-	-	-	(36)
TN-Chapel Woods Sewer	-	-	-	-	-	-	-	-
TN-Chapel Woods Sewer - Penalty	-	-	-	-	-	-	-	-
TN-DSH Commercial Sewer	-	-	-	-	-	-	-	-
TN-DSH Residential Sewer	-	-	-	-	-	-	-	-
TN-DSH Residential Sewer - Penalty			-	-	-			-

TN-Grass 1-2bed Sewer	-	-	-	-	-	-	-	-
TN-Grass 1-2bed Sewer - Penalty	-	-	-	-	-	(3)	-	(3)
TN-Grass 3bed Sewer	-	(191)	-	-	-	-	-	(191)
TN-Grass 3bed Sewer - Penalty	-	(7)	-	-	-	(4)	-	(11)
TN-Grass 4bed Sewer	-	-	-	-	-	-	-	-
TN-Grass 4bed Sewer - Penalty	-	-	-	-	-	-	(7)	(7)
TN-Grass 5bed Sewer	-	-	-	-	-	-	-	-
TN-Grass 5bed Sewer - Penalty						-	-	-
TN-Sewer Surcharge	-	(12)	-	(6)	-	-	(4)	(21)
TN-Shiloh Falls Commercial Sewer	-	-	-	(1,045)	-	-	-	(1,045)
TN-Shiloh Falls Commercial Sewer - Pena	-	-	-		-	-	-	-
TN-Shiloh Falls Sewer	-	-	-	-	-	(42)	-	(42)
Grand Total	**(6,629)**	**(600)**	**(4)**	**(1,050)**	**(5,475)**	**(48)**	**(39,969)**	**(53,775)**

Cause No. 2400044 Effective May 1, 2025

WATER per 1000

	Metered	Commodity	Commerical	Com Commo	Unmetered	Rate Case
TN-Aqua Water	$31.00	$3.05	$31.00	$3.05		$2.79
Candlewood Lakes					$50.00	$2.79

SEWER ERU

	Metered	Commodity	Unmetered	Commerical	Com Commo	Rate Case
Aqua	$35.00	$0.00		$35.00	$0.00	$2.79
Arrington/Hardeman/Hideaway			$75.00	$168.96	$0.00	$2.79
Chapel Woods			$40.00			$2.79
Shiloh Falls			$25.00	$55.60		$2.79
Lakeside Estates (DSH)			$55.00	$55.00		$2.79

ERU

	1-2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	Commerical	Com Commod	Rate Case
Grassland	$65.00	$70.00	$75.00	$75.00	$168.96	$0.00	$2.79

The Bluffs at Cumberla	$28.00
Genesis Village Estates	$36.56
Laurel Creek	$55.25
Riverstone	$47.98

Prior Rates

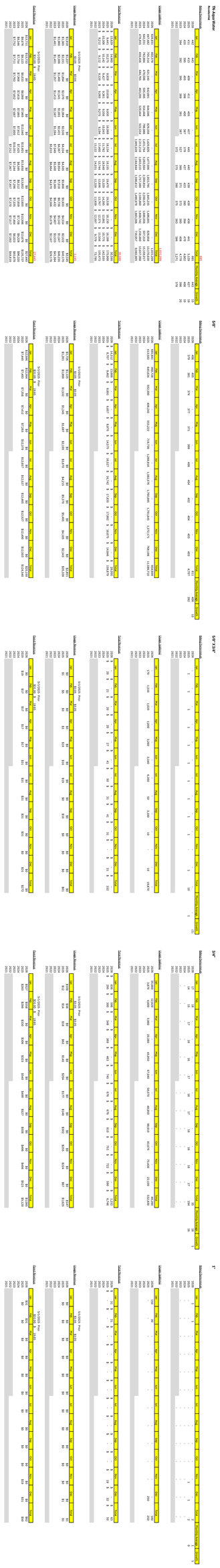
WATER per 1000

	Metered	Commodity	Unmetered	Rate Case
TN-Aqua Water	$19.65	$3.05		
Candlewood Lakes			$40.00	$0.00

SEWER ERU

	Metered	Commodity	Unmetered	Commerical	Com Commod	Rate Case
Aqua	$19.65	$3.05		$19.65	$3.05	
Arrington/Hardeman/Hideaway			$55.25	$37.00	$8.75	
Chapel Woods			$29.00			
Shiloh Falls	$8.90	$3.71		$8.90	$3.71	
Lakeside Estates (DSH)			$43.37	$68.37	$15.00	

	1-2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	Commerical	Com Commodity
Grassland	$42.00	$46.50	$52.00	$55.25	$37.00	$8.75



	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022															
2021															

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024													
2023													
2022													
2021													

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior
$2.01 $3.02

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

5/1/2025 Prior
$11.00 $ 13.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

2"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	1	1	1	1	1	1	1	1	1	-	1	1	10	1	0%
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	1	
2023	-	-	-	-	-	-	-	-	-	-	-	-	-		
2022															
2021															

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026		5,300								-			5,300
2025	5,300	5,200	83,400	396,800	1,700	5,200	2,600	100	100	-	400	9,000	509,800
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ 47	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 47
2025	$ 33	$ 32	$ 271	$ 1,226	$ 22	$ 47	$ 39	$ 31	$ 31	$ -	$ 32	$ 58	$ 1,815
2024													
2023													
2022													
2021													

5/1/2025 Prior
$2.01 $3.02

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$16	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$16
2025	$16	$16	$254	$1,210	$5	$16	$8	$0	$0	$0	$1	$27	$1,554
2024													
2023													
2022													
2021													

5/1/2025 Prior
$11.00 $ 13.65

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$31	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$31
2025	$17	$17	$17	$17	$17	$31	$31	$31	$31	$0	$31	$31	$269
2024													
2023													
2022													
2021													

Unknown

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	16	16	16	16	17	18	19	17	18	18	18	18	206	17	1
2024	-	-	-	-	-	-	-	-	-	-	-	-	-		
2023	-	-	-	-	-	-	-	-	-	-	-	-	-		
2022															
2021															

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	27,140	15,700											42,840
2025	24,940	48,500	28,370	16,456	39,914	34,040	85,040	45,830	60,910	69,710	40,690	27,400	521,270
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 655	$ 597	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,247
2025	$ 587	$ 458	$ 398	$ 368	$ 446	$ 662	$ 842	$ 674	$ 782	$ 765	$ 662	$ 642	$ 7,277
2024													
2023													
2022													
2021													

5/1/2025 Prior
$2.01 $3.02

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$83	$48	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$131
2025	$75	$147	$87	$50	$122	$104	$259	$140	$186	$213	$124	$84	$1,590
2024													
2023													
2022													
2021													

5/1/2025 Prior
$11.00 $ 13.65

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$957	$949	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$1,177
2025	$312	$311	$312	$316	$327	$358	$343	$334	$326	$301	$338	$316	$3,487
2024													
2023													
2022													
2021													

TN-Aqua Water

Commercial

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
													187		
2026	15	15	-	-	-	-	-	-	-	-	-	-	30	15	1
2025	14	14	15	15	14	16	11	16	16	11	10	15	167	14	(0)
2024	14	15	16	14	15	14	16	14	14	14	14	14	173	14	0
2023	16	15	15	15	14	14	14	14	14	13	15	15	171	14	(1)
2022							15	15	16	15	15	16	93	15	
2021															

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
													161,510
2026	50	10	-	-	-	-	-	-	-	-	-	-	60
2025	57,600	85,720	47,060	30,260	33,540	91,570	49,020	152,740	139,850	113,830	88,120	23,000	863,310
2024	153,090	35,820	3,070	113,220	22,030	45,010	157,320	260,380	279,300	391,190	530,690	151,200	2,135,896
2023	3,850	3,887	22,095	25,236	16,760	13,140	89,820	29,994	38,060	181,055	116,730	282,550	642,297
2022							86,390	186,580	175,260	54,250	100,165	35,630	638,275
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
													2,205
2026	$ 495	$ 495	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 990
2025	$ 465	$ 545	$ 432	$ 279	$ 365	$ 775	$ 491	$ 809	$ 923	$ 689	$ 579	$ 535	$ 7,092
2024	$ 598	$ 382	$ 320	$ 624	$ 357	$ 450	$ 609	$ 1,096	$ 1,434	$ 1,440	$ 1,915	$ 741	$ 9,917
2023	$ 326	$ 302	$ 354	$ 365	$ 322	$ 310	$ 539	$ 374	$ 442	$ 812	$ 642	$ 1,148	$ 5,838
2022							$ 561	$ 903	$ 840	$ 468	$ 607	$ 417	$ 3,796
2021													

5/1/2025 Prior

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Usage Revenue	$3.95	$3.95											7,653
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$177	$261	$145	$92	$102	$279	$150	$333	$427	$247	$200	$75	$2,833
2024	$314	$93	$12	$340	$67	$122	$107	$819	$1,157	$1,193	$1,834	$481	$6,514
2023	$12	$11	$69	$77	$51	$40	$273	$91	$177	$552	$356	$892	$3,372
2022							$263	$655	$135	$135	$306	$109	$1,877
2021													

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$15.00	$ 19.65											4,488
2026	$495	$495	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$990
2025	$334	$334	$287	$187	$263	$496	$341	$476	$496	$442	$379	$460	$4,539
2024	$283	$289	$308	$279	$290	$277	$282	$279	$278	$276	$281	$260	$3,402
2023	$315	$291	$286	$288	$271	$270	$266	$282	$265	$260	$286	$286	$3,366
2022							$298	$304	$305	$302	$302	$308	$1,819
2021													

5/8"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	4	-	-	-	-	-	-	-	-	-	-	-	4	5	(1)
2025	5	5	5	5	5	5	5	5	5	5	4	4	58	#DIV/0!	#DIV/0!
2024														#DIV/0!	#DIV/0!
2023														#DIV/0!	#DIV/0!
2022															
2021															

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	20	-	-	-	-	-	-	-	-	-	-	-	20
2025	2,360	7,220	30	120	3,770	47,060	6,190	21,090	39,380	13,210	2,280	1,100	143,800
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 124	$ 124	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 249
2025	$ 102	$ 117	$ 98	$ 98	$ 107	$ 299	$ 174	$ 219	$ 275	$ 196	$ 131	$ 127	$ 1,845
2024													
2023													
2022													
2021													

5/1/2025 Prior

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Usage Revenue	$3.25	$3.25											
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$7	$22	$0	$0	$11	$144	$19	$64	$120	$41	$7	$3	$439
2024													
2023													
2022													
2021													

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$15.00	$ 19.65											
2026	$124	$124	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$249
2025	$95	$95	$98	$98	$95	$155	$155	$155	$155	$155	$124	$124	$1,504
2024													
2023													
2022													
2021													

5/8" X3/4"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Usage Revenue	$3.25	$3.25											
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$21.00	$ 19.65											
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

3/4"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Usage Revenue	$3.25	$3.25											
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$31.00	$ 19.65											
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

1"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	8	8	-	-	-	-	-	-	-	-	-	-	16	8	7
2025	8	8	8	8	8	9	4	9	9	4	4	9	86	7	7
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	30	10	-	-	-	-	-	-	-	-	-	-	40
2025	50,810	78,010	47,530	30,140	29,370	42,910	38,630	23,250	27,470	26,820	19,340	21,800	441,480
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 279	$ 279	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 558
2025	$ 318	$ 388	$ 294	$ 241	$ 239	$ 419	$ 242	$ 300	$ 363	$ 206	$ 183	$ 345	$ 3,582
2024													
2023													
2022													
2021													

5/1/2025 Prior

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Usage Revenue	$3.95	$3.95											
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$170	$239	$145	$92	$90	$131	$118	$71	$84	$82	$58	$86	$1,347
2024													
2023													
2022													
2021													

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$31.00	$ 19.65											
2026	$279	$279	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$558
2025	$149	$149	$149	$149	$149	$279	$124	$279	$279	$124	$124	$279	$2,235
2024													
2023													
2022													
2021													

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
1	1	-	-	-	-	-	-	-	-	-	-	12	1	100
1	1	1	1	1	1	1	1	1	1	1	1	12	23	23
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(from Billed Analysis Report)

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	400	1,600	4,200	58,400	73,000	73,700	66,500	100	277,900
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$ 31	$ 31	$ 31	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 62
$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 36	$ 44	$ 209	$ 254	$ 258	$ 234	$ 31	$ 1,162
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

5/1/2025 Prior
$2.01 $3.02

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
$0	$0	$0	$0	$1	$5	$13	$178	$223	$225	$203	$0	$648
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

5/1/2025 Prior
$11.00 $ 10.65

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$31	$31	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$62
$20	$20	$20	$20	$16	$31	$31	$31	$31	$31	$31	$31	$314
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

2"

Billing Determinant

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Usage (gallons) (from Billed Analysis Report)

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

Total Revenue

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

5/1/2025 Prior
$3.02 $3.03

Usage Revenue

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

5/1/2025 Prior
$11.00 $ 10.65

Fixed Revenue

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

Unknown

Billing Determinant

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
-	1	1	-	-	-	-	-	-	-	-	-	2	1	-
-	1	1	1	1	1	1	1	1	1	1	1	12	1	1
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Usage (gallons) (from Billed Analysis Report)

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

Total Revenue

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$ 31	$ 31	$ 31	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 62
$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 31	$ 31	$ 31	$ 31	$ 31	$ 31	$ 315
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

5/1/2025 Prior
$3.02 $3.03

Usage Revenue

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

5/1/2025 Prior
$11.00 $ 10.65

Fixed Revenue

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
$10	$10	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$20
$20	$20	$20	$20	$20	$20	$31	$31	$31	$31	$31	$31	$315
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-

TN-Aqua Water
Irrigation

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	5	5	-	-	-	-	-	-	-	-	-	-	10	5	1
2025	3	3	3	4	5	5	6	4	5	5	5	5	53	4	2
2024	1	1	1	1	3	3	2	2	2	2	3	3	25	2	2
2023	-	-	-	-	-	-	-	-	-	1	1	1	2	0	0
2022							-	-	-	-	-	-	-	-	
2021															

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	1,810	-	-	-	-	-	-	-	-	-	-	1,810
2025	60	50	-	(50)	37,920	33,410	92,660	52,180	113,710	129,780	72,810	36,750	598,890
2024	-	-	-	-	-	-	19,800	122,050	137,220	107,060	94,670	54,005	534,805
2023	-	-	-	-	-	-	-	-	-	-	63,110	41,840	105,050
2022							-	-	-	-	-	-	-
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 155	$ 158	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 313
2025	$ 58	$ 59	$ 59	$ 77	$ 208	$ 257	$ 462	$ 290	$ 502	$ 551	$ 376	$ 267	$ 3,166
2024	$ 20	$ 20	$ 20	$ 20	$ 104	$ 61	$ 78	$ 455	$ 452	$ 374	$ 339	$ 154	$ 2,046
2023	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 12	$ 208	$ 145	$ 365
2022							$ -	$ -	$ -	$ -	$ -	$ -	$ -
2021													

5/1/2025 Prior

Usage Revenue $3.05 $3.05

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$3	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$3
2025	$0	$0	$0	$0	$116	$102	$263	$159	$247	$296	$221	$112	$1,726
2024	$0	$0	$0	$0	$0	$0	$33	$372	$419	$326	$289	$104	$1,545
2023	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$192	$126	$320
2022							$0	$0	$0	$0	$0	$0	$0
2021													

5/1/2025 Prior

Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$155	$158	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$313
2025	$59	$59	$59	$77	$92	$155	$165	$131	$165	$155	$155	$155	$1,410
2024	$20	$20	$20	$20	$104	$61	$45	$33	$33	$46	$50	$50	$501
2023	$0	$0	$0	$0	$0	$0	$0	$0	$0	$12	$17	$17	$46
2022							$0	$0	$0	$0	$0	$0	$0
2021													

5/8"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	1	-	-	-	-	-	-	-	-	-	-	-	1	1	-
2025	1	1	1	1	1	1	1	1	1	1	1	1	12	1	#DIV/0!
2024														#DIV/0!	#DIV/0!
2023														#DIV/0!	#DIV/0!
2022														#DIV/0!	
2021															

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	60	50	-	(50)	-	-	-	16,150	34,990	25,230	2,280	80	77,890
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 31	$ 31	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 62
2025	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 31	$ 31	$ 80	$ 135	$ 108	$ 36	$ 31	$ 553
2024													
2023													
2022													
2021													

5/1/2025 Prior

Usage Revenue $3.01 $3.01

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$49	$104	$77	$7	$0	$238
2024													
2023													
2022													
2021													

5/1/2025 Prior

Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$31	$31	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$62
2025	$19	$19	$20	$20	$20	$31	$31	$31	$31	$31	$31	$31	$315
2024													
2023													
2022													
2021													

5/8" X3/4"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024															
2023															
2022															
2021															

Usage (gallons) (Non Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior

Usage Revenue $3.01 $3.01

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

5/1/2025 Prior

Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

3/4"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	2	2	2	3	4	4	5	3	4	4	4	4	41	3	3
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022															
2021															

Usage (gallons) (Non Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	1,810	-	-	-	-	-	-	-	-	-	-	1,810
2025	-	-	-	-	37,920	33,410	92,660	36,030	79,820	104,550	70,330	36,670	491,190
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 124	$ 127	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 251
2025	$ 26	$ 38	$ 38	$ 56	$ 188	$ 226	$ 431	$ 210	$ 367	$ 443	$ 339	$ 226	$ 2,615
2024													
2023													
2022													
2021													

5/1/2025 Prior

Usage Revenue $3.05 $3.05

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$3	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$3
2025	$0	$0	$0	$0	$116	$102	$263	$110	$242	$319	$215	$112	$1,498
2024													
2023													
2022													
2021													

5/1/2025 Prior

Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$124	$124	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$248
2025	$26	$38	$38	$56	$72	$124	$149	$100	$124	$124	$124	$124	$1,119
2024													
2023													
2022													
2021													

1"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022															
2021															

Usage (gallons) (Non Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior

Usage Revenue $3.05 $3.05

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

5/1/2025 Prior

Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Usage (optional) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

5/1/2025 Prior
$2.01 $2.02

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

5/1/2025 Prior
$11.00 $ 18.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

2"

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022															
2021															

Usage (optional) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior
Usage Revenue $3.02 $3.03

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

5/1/2025 Prior
Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

Unknown

Billing Determinant

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022															
2021															

Usage (optional) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2025	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
2024													
2023													
2022													
2021													

5/1/2025 Prior
Usage Revenue $3.02 $3.03

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

5/1/2025 Prior
Fixed Revenue $11.00 $ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2024													
2023													
2022													
2021													

TN-Candlewood Water

Residential

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	110	110	-	-	-	-	-	-	-	-	-	-	220	18	(91)
2025	109	109	109	110	109	110	110	110	109	111	110	110	1,262	110	5
2024	104	104	104	105	103	104	105	105	106	106	108	108	1,262	105	0
2023							104	104	105	107	106	103	629	105	
2022															
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 5,500	$ 5,500	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 11,000
2025	$ 4,349	$ 4,360	$ 4,375	$ 4,383	$ 4,371	$ 5,500	$ 5,500	$ 5,497	$ 5,455	$ 5,564	$ 5,497	$ 5,500	$ 60,350
2024	$ 4,160	$ 4,160	$ 4,160	$ 4,192	$ 4,128	$ 4,160	$ 4,197	$ 4,200	$ 4,236	$ 4,236	$ 4,316	$ 4,317	$ 50,462
2023							$ 4,145	$ 4,160	$ 4,199	$ 4,281	$ 4,223	$ 4,137	$ 25,144
2022													
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-							
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$50.00	$ 40.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$5,500	$5,500	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$11,000
2025	$4,349	$4,360	$4,375	$4,383	$4,371	$5,500	$5,500	$5,497	$5,455	$5,564	$5,497	$5,500	$60,350
2024	$4,160	$4,160	$4,160	$4,192	$4,128	$4,160	$4,197	$4,200	$4,236	$4,236	$4,316	$4,317	$50,462
2023							$4,145	$4,160	$4,199	$4,281	$4,223	$4,137	$25,144
2022													
2021													

TN-Aqua Sewer

Residential

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	377	378	-	-	-	-	-	-	-	-	-	-	755	63	(313)
2025	349	351	346	348	343	428	474	373	373	372	374	375	4,507	376	39
2024	339	337	345	342	342	334	325	339	331	331	334	341	4,040	337	(7)
2023	338	338	339	334	336	333	473	317	318	321	326	353	4,125	344	(7)
2022							360	362	363	360	331	332	2,107	351	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	401,552	629,704	582,280	818,351	563,836	669,206	1,103,616	-	-	-	-	-	4,768,545
2024	690,128	702,210	420,945	467,592	578,587	662,326	1,107,104	2,343,814	1,454,354	1,331,469	867,866	594,810	11,221,205
2023	437,535	404,826	406,610	411,453	456,500	413,092	1,558,600	1,163,393	1,205,056	1,266,706	1,072,125	758,457	9,554,353
2022							1,313,548	1,480,074	1,122,902	1,033,420	1,045,495	630,450	6,625,889
2021													-

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 13,206	$ 13,230	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 26,436
2025	$ 8,091	$ 8,824	$ 8,577	$ 9,327	$ 8,454	$ 14,968	$ 16,599	$ 13,067	$ 13,047	$ 13,033	$ 13,091	$ 13,129	$ 140,205
2024	$ 8,775	$ 8,763	$ 8,062	$ 8,137	$ 8,491	$ 8,584	$ 9,755	$ 13,818	$ 10,931	$ 10,574	$ 9,217	$ 8,513	$ 113,620
2023	$ 7,984	$ 7,872	$ 7,902	$ 7,810	$ 7,988	$ 7,794	$ 14,046	$ 9,785	$ 9,928	$ 10,165	$ 9,679	$ 9,246	$ 110,199
2022							$ 11,081	$ 11,621	$ 10,562	$ 10,218	$ 9,686	$ 8,448	$ 61,615
2021													

Usage Revenue

	5/1/2025	Prior
	$0.00	$ 3.05

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$1,225	$1,921	$1,776	$2,496	$1,720	$0	$0	$0	$0	$0	$0	$0	$9,137
2024	$2,105	$2,142	$1,284	$1,426	$1,765	$2,020	$3,377	$7,149	$4,436	$4,061	$2,647	$1,814	$34,225
2023	$1,334	$1,235	$1,240	$1,255	$1,392	$1,260	$4,754	$3,548	$3,675	$3,863	$3,270	$2,313	$29,141
2022							$4,006	$4,514	$3,425	$3,152	$3,189	$1,923	$20,209
2021													

Fixed Revenue

	5/1/2025	Prior
	$35.00	$ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$13,206	$13,230	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$26,436
2025	$6,866	$6,903	$6,801	$6,831	$6,734	$14,968	$16,599	$13,067	$13,047	$13,033	$13,091	$13,129	$131,068
2024	$6,670	$6,621	$6,778	$6,711	$6,726	$6,564	$6,378	$6,670	$6,495	$6,513	$6,570	$6,699	$79,395
2023	$6,650	$6,638	$6,662	$6,555	$6,596	$6,534	$9,292	$6,237	$6,253	$6,302	$6,409	$6,933	$81,058
2022							$7,075	$7,107	$7,137	$7,066	$6,497	$6,525	$41,406
2021													

TN-Aqua Commercial Sewer

Commercial

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	36	36	-	-	-	-	-	-	-	-	-	-	72	6	(18)
2025	6	6	7	7	6	37	37	37	37	37	36	36	289	24	18
2024	6	6	7	6	7	6	7	6	6	6	6	6	75	6	0
2023	7	7	7	7	6	6	6	6	6	5	6	6	73	6	(1)
2022							7	7	7	7	6	7	41	7	7
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	57,990	85,730	47,550	30,270	33,080	-	40	-	-	-	-	-	254,660
2024	33,090	27,610	3,806	113,080	21,830	39,800	86,900	164,780	151,040	160,800	359,080	52,460	1,214,276
2023	3,850	3,687	22,585	25,236	16,780	13,140	89,620	29,994	58,060	41,255	27,430	25,450	357,087
2022							79,850	197,090	175,260	54,250	100,165	35,630	642,245
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 1,260	$ 1,260	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 2,520
2025	$ 302	$ 387	$ 273	$ 220	$ 226	$ 1,295	$ 1,295	$ 1,295	$ 1,295	$ 1,295	$ 1,260	$ 1,260	$ 10,404
2024	$ 211	$ 199	$ 143	$ 467	$ 200	$ 242	$ 393	$ 625	$ 583	$ 613	$ 1,221	$ 285	$ 5,180
2023	$ 146	$ 145	$ 197	$ 208	$ 165	$ 153	$ 381	$ 217	$ 285	$ 231	$ 196	$ 190	$ 2,516
2022							$ 381	$ 739	$ 672	$ 303	$ 431	$ 240	$ 2,766
2021													

Usage Revenue

5/1/2025	Prior
$0.00	$ 3.05

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$177	$261	$145	$92	$101	$0	$0	$0	$0	$0	$0	$0	$777
2024	$101	$84	$12	$345	$67	$121	$265	$503	$461	$490	$1,095	$160	$3,704
2023	$12	$11	$69	$77	$51	$40	$273	$91	$177	$126	$84	$78	$1,089
2022							$244	$601	$535	$165	$306	$109	$1,959
2021													

Fixed Revenue

5/1/2025	Prior
$35.00	$ 19.65

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$1,260	$1,260	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$2,520
2025	$125	$125	$128	$128	$125	$1,295	$1,295	$1,295	$1,295	$1,295	$1,260	$1,260	$9,627
2024	$110	$115	$131	$122	$133	$121	$128	$122	$122	$122	$126	$125	$1,477
2023	$134	$133	$128	$131	$114	$113	$108	$125	$108	$106	$112	$113	$1,427
2022							$138	$138	$138	$138	$125	$131	$807
2021													

TN-CC Res Sewer

TN-Arrington

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	218	218	-	-	-	-	-	-	-	-	-	-	2,621	36	(181)
2025	217	218	218	219	218	219	216	219	218	215	217	218	2,621	218	(1)
2024	218	219	220	220	219	216	218	218	218	218	218	219	2,621	218	1
2023	216	219	215	216	218	218	220	218	219	218	218	218	2,613	218	(1)
2022							220	219	217	220	218	217	1,311	218	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 16,333	$ 16,350	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 32,683
2025	$ 12,004	$ 12,045	$ 12,045	$ 12,091	$ 12,043	$ 16,420	$ 16,231	$ 16,405	$ 16,333	$ 16,097	$ 16,278	$ 16,370	$ 174,359
2024	$ 12,045	$ 12,100	$ 12,140	$ 12,127	$ 12,127	$ 11,952	$ 12,059	$ 12,032	$ 12,045	$ 12,045	$ 12,045	$ 12,087	$ 144,803
2023	$ 11,941	$ 12,074	$ 11,899	$ 11,934	$ 12,031	$ 12,059	$ 12,135	$ 12,057	$ 12,091	$ 12,045	$ 12,061	$ 12,029	$ 144,357
2022							$ 12,155	$ 12,118	$ 12,002	$ 12,139	$ 12,035	$ 11,966	$ 72,416
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

		5/1/2025	Prior
Fixed Revenue		$75.00	$ 55.25

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$16,333	$16,350	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$32,683
2025	$12,004	$12,045	$12,045	$12,091	$12,043	$16,420	$16,231	$16,405	$16,333	$16,097	$16,278	$16,370	$174,359
2024	$12,045	$12,100	$12,140	$12,127	$12,127	$11,952	$12,059	$12,032	$12,045	$12,045	$12,045	$12,087	$144,803
2023	$11,941	$12,074	$11,899	$11,934	$12,031	$12,059	$12,135	$12,057	$12,091	$12,045	$12,061	$12,029	$144,357
2022							$12,155	$12,118	$12,002	$12,139	$12,035	$11,966	$72,416
2021													

TN-CC Comm Sewer

TN-Arrington

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	1	1	-	-	-	-	-	-	-	-	-	-	12	0	(1)
2025	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2024	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2023	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2022							1	1	1	1	1	1	6	1	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 169	$ 169	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 338
2025	$ 37	$ 37	$ 37	$ 37	$ 37	$ 169	$ 169	$ 169	$ 169	$ 169	$ 169	$ 169	$ 1,368
2024	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 444
2023	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 444
2022							$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 222
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

		5/1/2025	6/1/2022	prior
Fixed Revenue		$168.96	$ 37.00	$ 45.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$169	$169	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$338
2025	$37	$37	$37	$37	$37	$169	$169	$169	$169	$169	$169	$169	$1,368
2024	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$444
2023	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$444
2022							$37	$37	$37	$37	$37	$37	$222
2021													

TN-CC Res Sewer

TN-Hardeman Springs

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	95	95	-	-	-	-	-	-	-	-	-	-	1,065	16	(75)
2025	89	89	90	90	90	93	90	92	93	90	94	92	1,065	91	2
2024	89	88	88	90	89	88	89	90	89	90	88	89	1,065	89	9
2023	77	77	77	76	79	80	79	79	81	83	86	85	958	80	7
2022							68	72	75	75	75	75	440	73	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 7,098	$ 7,125	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 14,223
2025	$ 4,917	$ 4,917	$ 4,969	$ 4,950	$ 4,982	$ 6,938	$ 6,776	$ 6,875	$ 6,975	$ 6,778	$ 7,013	$ 6,934	$ 73,024
2024	$ 4,903	$ 4,838	$ 4,862	$ 4,973	$ 4,917	$ 4,864	$ 4,917	$ 4,947	$ 4,891	$ 4,985	$ 4,853	$ 4,917	$ 58,867
2023	$ 4,232	$ 4,251	$ 4,236	$ 4,227	$ 4,340	$ 4,432	$ 4,365	$ 4,383	$ 4,488	$ 4,586	$ 4,733	$ 4,675	$ 52,948
2022							$ 3,761	$ 3,998	$ 4,123	$ 4,136	$ 4,133	$ 4,144	$ 24,295
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

		5/1/2025	Prior
Fixed Revenue		$75.00	$ 55.25

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$7,098	$7,125	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$14,223
2025	$4,917	$4,917	$4,969	$4,950	$4,982	$6,938	$6,776	$6,875	$6,975	$6,778	$7,013	$6,934	$73,024
2024	$4,903	$4,838	$4,862	$4,973	$4,917	$4,864	$4,917	$4,947	$4,891	$4,985	$4,853	$4,917	$58,867
2023	$4,232	$4,251	$4,236	$4,227	$4,340	$4,432	$4,365	$4,383	$4,488	$4,586	$4,733	$4,675	$52,948
2022							$3,761	$3,998	$4,123	$4,136	$4,133	$4,144	$24,295
2021													

TN-CC Comm Sewer

TN-Hardeman Springs

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	1	1	-	-	-	-	-	-	-	-	-	-	12	0	(1)
2025	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2024	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2023	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2022							1	1	1	1	1	1	6	1	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 169	$ 169	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 338
2025	$ 37	$ 37	$ 37	$ 37	$ 37	$ 169	$ 169	$ 169	$ 169	$ 169	$ 169	$ 169	$ 1,368
2024	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 444
2023	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 444
2022							$ 37	$ 37	$ 37	$ 37	$ 37	$ 37	$ 222
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

		5/1/2025	6/1/2022	Prior
Fixed Revenue		$168.96	$ 37.00	$ 7.50

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$169	$169	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$338
2025	$37	$37	$37	$37	$37	$169	$169	$169	$169	$169	$169	$169	$1,368
2024	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$444
2023	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$37	$444
2022							$37	$37	$37	$37	$37	$37	$222
2021													

TN-CC Res Sewer

TN-Hideaway

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	130	129	-	-	-	-	-	-	-	-	-	-	1,458	22	(103)
2025	122	124	124	123	124	125	124	125	125	125	129	129	1,458	125	3
2024	121	121	121	121	122	122	123	122	121	121	120	123	1,458	121	18
2023	98	95	98	99	100	100	101	106	107	111	113	118	1,246	104	104
2022							85	89	89	90	93	96	541		
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 9,735	$ 9,667	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 19,402
2025	$ 6,751	$ 6,851	$ 6,831	$ 6,807	$ 6,838	$ 9,358	$ 9,313	$ 9,338	$ 9,395	$ 9,344	$ 9,690	$ 9,680	$ 100,194
2024	$ 6,659	$ 6,685	$ 6,685	$ 6,685	$ 6,755	$ 6,735	$ 6,787	$ 6,757	$ 6,658	$ 6,697	$ 6,650	$ 6,796	$ 80,550
2023	$ 5,402	$ 5,269	$ 5,427	$ 5,492	$ 5,517	$ 5,503	$ 5,563	$ 5,842	$ 5,938	$ 6,129	$ 6,248	$ 6,527	$ 68,857
2022							$ 4,712	$ 4,904	$ 4,899	$ 4,950	$ 5,146	$ 5,304	$ 29,915
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

		5/1/2025	Prior
Fixed Revenue		$75.00	$ 55.25

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$9,735	$9,667	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$19,402
2025	$6,751	$6,851	$6,831	$6,807	$6,838	$9,358	$9,313	$9,338	$9,395	$9,344	$9,690	$9,680	$100,194
2024	$6,659	$6,685	$6,685	$6,685	$6,755	$6,735	$6,787	$6,757	$6,658	$6,697	$6,650	$6,796	$80,550
2023	$5,402	$5,269	$5,427	$5,492	$5,517	$5,503	$5,563	$5,842	$5,938	$6,129	$6,248	$6,527	$68,857
2022							$4,712	$4,904	$4,899	$4,950	$5,146	$5,304	$29,915
2021													

TN-CC Comm Sewer

TN-Hideaway

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	5	5	-	-	-	-	-	-	-	-	-	-	60	1	(4)
2025	5	5	5	5	5	5	5	5	5	5	5	5	60	5	-
2024	5	5	5	5	5	5	5	5	5	5	5	5	60	5	-
2023	5	5	5	5	5	5	5	5	5	5	5	5	60	5	-
2022							5	5	5	5	5	5	30	5	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 845	$ 845	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,690
2025	$ 185	$ 185	$ 185	$ 185	$ 185	$ 845	$ 845	$ 845	$ 845	$ 845	$ 845	$ 845	$ 6,839
2024	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 2,220
2023	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 2,220
2022							$ 185	$ 185	$ 185	$ 185	$ 185	$ 185	$ 1,110
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$168.96	$ 37.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$845	$845	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$1,690
2025	$185	$185	$185	$185	$185	$845	$845	$845	$845	$845	$845	$845	$6,839
2024	$185	$185	$185	$185	$185	$185	$185	$185	$185	$185	$185	$185	$2,220
2023	$185	$185	$185	$185	$185	$185	$185	$185	$185	$185	$185	$185	$2,220
2022							$185	$185	$185	$185	$185	$185	$1,110
2021													

TN-Chapel Woods Sewer

Residential

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	140	140	-	-	-	-	-	-	-	-	-	-	280	23	(118)
2025	142	141	141	141	141	140	141	142	142	141	142	141	1,695	141	(1)
2024	140	140	141	140	141	146	143	144	144	144	144	143	1,710	143	(0)
2023	139	142	144	142	143	145	145	146	144	142	140	142	1,714	143	1
2022												142	142	142	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 5,600	$ 5,600	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 11,200
2025	$ 4,118	$ 4,089	$ 4,089	$ 4,089	$ 4,095	$ 5,616	$ 5,640	$ 5,680	$ 5,697	$ 5,630	$ 5,667	$ 5,636	$ 60,047
2024	$ 4,053	$ 4,060	$ 4,095	$ 4,055	$ 4,085	$ 4,236	$ 4,155	$ 4,186	$ 4,165	$ 4,176	$ 4,177	$ 4,153	$ 49,596
2023	$ 4,041	$ 4,118	$ 4,164	$ 4,128	$ 4,147	$ 4,205	$ 4,205	$ 4,225	$ 4,170	$ 4,121	$ 4,067	$ 4,126	$ 49,717
2022												$ 4,109	$ 4,109
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$40.00	$ 29.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$5,600	$5,600	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$11,200
2025	$4,118	$4,089	$4,089	$4,089	$4,095	$5,616	$5,640	$5,680	$5,697	$5,630	$5,667	$5,636	$60,047
2024	$4,053	$4,060	$4,095	$4,055	$4,085	$4,236	$4,155	$4,186	$4,165	$4,176	$4,177	$4,153	$49,596
2023	$4,041	$4,118	$4,164	$4,128	$4,147	$4,205	$4,205	$4,225	$4,170	$4,121	$4,067	$4,126	$49,717
2022												$4,109	$4,109
2021													

TN-DSH Residential Sewer

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	8	9	-	-	-	-	-	-	-	-	-	-	17	1	(4)
2025	4	4	4	4	4	6	6	6	6	8	7	8	67	6	2
2024			4	4	4	4	4	4	4	4	4	4	35	4	
2023															
2022															
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 440	$ 495	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 935
2025	$ 154	$ 154	$ 178	$ 184	$ 184	$ 330	$ 330	$ 330	$ 330	$ 456	$ 405	$ 440	$ 3,475
2024			$ 154	$ 154	$ 154	$ 154	$ 154	$ 154	$ 154	$ 154	$ 154	$ 154	$ 1,537
2023													
2022													
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

		5/1/2025	Prior
Fixed Revenue		$55.00	$ 43.37

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$440	$495	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$935
2025	$154	$154	$178	$184	$184	$330	$330	$330	$330	$456	$405	$440	$3,475
2024			$154	$154	$154	$154	$154	$154	$154	$154	$154	$154	$1,537
2023													
2022													
2021													

TN-DSH Commercial Sewer

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12				
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth	Monthly Avg Jun-Dec
2026	137	137	-	-	-	-	-	-	-	-	-	-	274	23	(73)	-
2025	44	39	37	37	36	138	140	133	137	137	137	137	1,152	96	54	137
2024			37	44	41	40	42	51	42	49	37	37	420	42		
2023																
2022																
2021																

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	169,840	283,766	24,574	60,886	64,705	-	-	-	-	-	-	-	603,771
2024			52,208	57,980	186,538	339,876	545,156	694,037	454,367	404,032	174,999	59,500	2,968,693
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 7,535	$ 7,524	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 15,059
2025	$ 3,235	$ 3,074	$ 2,565	$ 2,614	$ 2,569	$ 7,601	$ 7,689	$ 7,333	$ 7,535	$ 7,535	$ 7,535	$ 7,535	$ 66,819
2024			$ 2,621	$ 3,063	$ 3,086	$ 3,258	$ 3,723	$ 4,543	$ 3,538	$ 3,941	$ 2,763	$ 2,603	$ 33,140
2023													
2022													
2021													

Usage Revenue

5/1/2025	Prior
$0.00	$ 1.50

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$255	$426	$37	$91	$97	$0	$0	$0	$0	$0	$0	$0	$906
2024			$78	$87	$280	$510	$818	$1,041	$682	$606	$262	$89	$4,453
2023													
2022													
2021													

Fixed Revenue

5/1/2025	Prior
$55.00	$ 68.37

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$7,535	$7,524	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$15,059
2025	$2,980	$2,648	$2,528	$2,523	$2,472	$7,601	$7,689	$7,333	$7,535	$7,535	$7,535	$7,535	$65,914
2024			$2,543	$2,976	$2,806	$2,748	$2,905	$3,502	$2,857	$3,335	$2,501	$2,514	$28,687
2023													
2022													
2021													

TN-Genesis Village Estates Sewer-Residential

Residential

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	30	30	-	-	-	-	-	-	-	-	-	-	60	5	
2025						31	31	31	31	31	31	31	217	31	
2024															
2023															
2022															
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 1,097	$ 1,097	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 2,194
2025						$ 1,119	$ 1,133	$ 1,133	$ 1,133	$ 1,133	$ 1,133	$ 1,133	$ 7,919
2024													
2023													
2022													
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue $36.56

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$1,097	$1,097	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$2,194
2025						$1,119	$1,133	$1,133	$1,133	$1,133	$1,133	$1,133	$7,919
2024													
2023													
2022													
2021													

TN-Grass 1-2bed Sewer

TN-Grasslands

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	33	33	-	-	-	-	-	-	-	-	-	-	66	6	(30)
2025	35	35	36	34	35	36	37	38	38	34	34	33	424	35	0
2024	35	35	35	35	35	35	36	34	35	35	35	35	419	35	1
2023	33	34	35	33	34	34	34	33	35	33	34	35	407	34	(0)
2022							34	34	34	34	34	34	204	34	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 2,145	$ 2,145	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 4,290
2025	$ 1,470	$ 1,470	$ 1,530	$ 1,413	$ 1,470	$ 2,344	$ 2,403	$ 2,438	$ 2,496	$ 2,198	$ 2,178	$ 2,145	$ 23,553
2024	$ 1,462	$ 1,450	$ 1,470	$ 1,470	$ 1,470	$ 1,470	$ 1,515	$ 1,432	$ 1,467	$ 1,481	$ 1,460	$ 1,470	$ 17,618
2023	$ 1,387	$ 1,428	$ 1,455	$ 1,404	$ 1,428	$ 1,429	$ 1,428	$ 1,397	$ 1,455	$ 1,392	$ 1,428	$ 1,459	$ 17,090
2022							$ 1,428	$ 1,428	$ 1,429	$ 1,428	$ 1,428	$ 1,428	$ 8,569
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$65.00	$ 42.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$2,145	$2,145	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$4,290
2025	$1,470	$1,470	$1,530	$1,413	$1,470	$2,344	$2,403	$2,438	$2,496	$2,198	$2,178	$2,145	$23,553
2024	$1,462	$1,450	$1,470	$1,470	$1,470	$1,470	$1,515	$1,432	$1,467	$1,481	$1,460	$1,470	$17,618
2023	$1,387	$1,428	$1,455	$1,404	$1,428	$1,429	$1,428	$1,397	$1,455	$1,392	$1,428	$1,459	$17,090
2022							$1,428	$1,428	$1,429	$1,428	$1,428	$1,428	$8,569
2021													

TN-Grass 3bed Sewer

TN-Grasslands

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	273	274	-	-	-	-	-	-	-	-	-	-	547	46	(232)
2025	279	279	279	279	279	279	277	276	277	277	277	277	3,336	278	(0)
2024	277	277	277	278	280	278	280	278	278	279	278	279	3,339	278	1
2023	279	277	278	278	278	279	280	275	278	277	276	277	3,332	278	(1)
2022							278	279	278	279	277	278	1,669	278	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 19,075	$ 19,182	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 38,257
2025	$ 12,986	$ 12,963	$ 12,974	$ 12,974	$ 12,974	$ 19,537	$ 19,424	$ 19,339	$ 19,397	$ 19,423	$ 19,362	$ 19,413	$ 200,763
2024	$ 12,859	$ 12,881	$ 12,881	$ 12,944	$ 13,018	$ 12,930	$ 13,020	$ 12,945	$ 12,925	$ 12,967	$ 12,929	$ 12,974	$ 155,272
2023	$ 12,961	$ 12,891	$ 12,927	$ 12,927	$ 12,925	$ 12,972	$ 13,006	$ 12,808	$ 12,924	$ 12,885	$ 12,839	$ 12,857	$ 154,923
2022							$ 12,943	$ 12,992	$ 12,912	$ 12,993	$ 12,862	$ 12,929	$ 77,630
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$70.00	$ 46.50

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$19,075	$19,182	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$38,257
2025	$12,986	$12,963	$12,974	$12,974	$12,974	$19,537	$19,424	$19,339	$19,397	$19,423	$19,362	$19,413	$200,763
2024	$12,859	$12,881	$12,881	$12,944	$13,018	$12,930	$13,020	$12,945	$12,925	$12,967	$12,929	$12,974	$155,272
2023	$12,961	$12,891	$12,927	$12,927	$12,925	$12,972	$13,006	$12,808	$12,924	$12,885	$12,839	$12,857	$154,923
2022							$12,943	$12,992	$12,912	$12,993	$12,862	$12,929	$77,630
2021													

TN-Grass 4bed Sewer

TN-Grasslands

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	190	188	-	-	-	-	-	-	-	-	-	-	378	32	(158)
2025	190	190	190	191	190	190	191	191	188	189	189	189	2,277	190	(0)
2024	189	189	190	188	189	191	189	191	191	192	191	191	2,280	190	1
2023	188	188	189	187	189	190	188	189	189	190	188	189	2,263	189	0
2022							189	189	188	188	188	188	1,130	188	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 14,250	$ 14,103	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 28,353
2025	$ 9,880	$ 9,880	$ 9,880	$ 9,944	$ 9,862	$ 14,213	$ 14,302	$ 14,318	$ 14,090	$ 14,192	$ 14,153	$ 14,175	$ 148,888
2024	$ 9,828	$ 9,830	$ 9,875	$ 9,797	$ 9,815	$ 9,932	$ 9,805	$ 9,953	$ 9,915	$ 9,963	$ 9,935	$ 9,910	$ 118,557
2023	$ 9,776	$ 9,776	$ 9,805	$ 9,748	$ 9,805	$ 9,859	$ 9,771	$ 9,828	$ 9,847	$ 9,873	$ 9,785	$ 9,828	$ 117,702
2022							$ 9,828	$ 9,830	$ 9,776	$ 9,799	$ 9,753	$ 9,776	$ 58,763
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$75.00	$ 52.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$14,250	$14,103	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$28,353
2025	$9,880	$9,880	$9,880	$9,944	$9,862	$14,213	$14,302	$14,318	$14,090	$14,192	$14,153	$14,175	$148,888
2024	$9,828	$9,830	$9,875	$9,797	$9,815	$9,932	$9,805	$9,953	$9,915	$9,963	$9,935	$9,910	$118,557
2023	$9,776	$9,776	$9,805	$9,748	$9,805	$9,859	$9,771	$9,828	$9,847	$9,873	$9,785	$9,828	$117,702
2022							$9,828	$9,830	$9,776	$9,799	$9,753	$9,776	$58,763
2021													

TN-Grass 5bed Sewer

TN-Grasslands

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	8	8	-	-	-	-	-	-	-	-	-	-	16	1	(7)
2025	8	8	8	8	8	8	8	8	8	8	8	8	96	8	0
2024	8	8	8	8	8	8	8	8	8	8	8	8	96	8	-
2023	8	8	8	8	8	8	8	8	8	8	8	8	96	8	-
2022							8	8	8	8	8	8	48	8	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 583	$ 600	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,183
2025	$ 442	$ 442	$ 442	$ 442	$ 442	$ 600	$ 600	$ 600	$ 600	$ 600	$ 600	$ 620	$ 6,430
2024	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 5,304
2023	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 5,304
2022							$ 442	$ 442	$ 442	$ 442	$ 442	$ 442	$ 2,652
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$75.00	$ 55.25

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$583	$600	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$1,183
2025	$442	$442	$442	$442	$442	$600	$600	$600	$600	$600	$600	$620	$6,430
2024	$442	$442	$442	$442	$442	$442	$442	$442	$442	$442	$442	$442	$5,304
2023	$442	$442	$442	$442	$442	$442	$442	$442	$442	$442	$442	$442	$5,304
2022							$442	$442	$442	$442	$442	$442	$2,652
2021													

TN-CC Comm Sewer

TN-Grasslands

Billing Determinate

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth	Montly Avg Nov-Dec)
2026	143	136	-	-	-	-	-	-	-	-	-	-	528	23	(97)	-
2025	51	44	44	44	44	199	199	199	199	144	136	136	528	120	76	136
2024	44	44	45	43	44	44	44	44	44	44	44	44	528	44	1	
2023	43	43	43	43	43	43	43	43	43	43	45	43	518	43	0	
2022							43	43	43	43	43	43	258	43		
2021																

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 24,161	$ 23,012	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 47,174
2025	$ 1,887	$ 1,629	$ 1,628	$ 1,628	$ 1,628	$ 33,623	$ 33,623	$ 33,623	$ 33,623	$ 24,246	$ 22,900	$ 22,979	$ 213,016
2024	$ 1,628	$ 1,628	$ 1,665	$ 1,592	$ 1,628	$ 1,628	$ 1,628	$ 1,628	$ 1,628	$ 1,628	$ 1,628	$ 1,628	$ 19,537
2023	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,605	$ 1,648	$ 1,609	$ 19,181
2022						$ 1,914	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 1,591	$ 11,460
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

	5/1/2025	Prior
	$168.96	$ 37.00

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$24,161	$23,012	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$47,174
2025	$1,887	$1,629	$1,628	$1,628	$1,628	$33,623	$33,623	$33,623	$33,623	$24,246	$22,900	$22,979	$213,016
2024	$1,628	$1,628	$1,665	$1,592	$1,628	$1,628	$1,628	$1,628	$1,628	$1,628	$1,628	$1,628	$19,537
2023	$1,591	$1,591	$1,591	$1,591	$1,591	$1,591	$1,591	$1,591	$1,591	$1,605	$1,648	$1,609	$19,181
2022						$1,914	$1,591	$1,591	$1,591	$1,591	$1,591	$1,591	$11,460
2021													

TN-Laurel Creek Residential Sewer

Residential

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	1	2	-	-	-	-	-	-	-	-	-	-	3	0	
2025								1	3	2	2	3	10	2	
2024														#DIV/0!	
2023														#DIV/0!	
2022														#DIV/0!	
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 81	$ 111	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 192
2025								$ 37	$ 149	$ 111	$ 111	$ 142	$ 549
2024													
2023													
2022													
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue $55.25

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$81	$111	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$192
2025								$37	$149	$111	$111	$142	$549
2024													
2023													
2022													
2021													

TN-Riverstone Res Sewer

Residential

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	33	33	-	-	-	-	-	-	-	-	-	-	66	6	
2025	34	34	34	35	35	34	35	33	33	33	33	33	405	34	
2024															
2023															
2022															
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 1,583	$ 1,583	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 3,167
2025	$ 1,619	$ 1,631	$ 1,631	$ 1,679	$ 1,679	$ 1,631	$ 1,659	$ 1,583	$ 1,583	$ 1,583	$ 1,583	$ 1,583	$ 19,446
2024													
2023													
2022													
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue $47.98

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$1,583	$1,583	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$3,167
2025	$1,619	$1,631	$1,631	$1,679	$1,679	$1,631	$1,659	$1,583	$1,583	$1,583	$1,583	$1,583	$19,446
2024													
2023													
2022													
2021													

TN-Shiloh Falls Sewer

Residential

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	320	323	-	-	-	-	-	-	-	-	-	-	643	54	(275)
2025	322	342	338	340	344	324	323	322	323	324	324	322	3,947	329	(9)
2024	331	326	331	332	351	336	335	346	345	350	338	337	4,058	338	15
2023				312	312	319	320	320	331	335	333	325	2,907	323	
2022															
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	767,340	546,220	843,990	663,100	-	-	-	-	-	-	-	2,820,650
2024	623,357	765,372	604,270	533,230	682,830	699,970	695,860	1,955,170	1,297,580	1,055,940	753,940	632,440	10,299,959
2023				693,170	63,739	593,004	848,517	963,463	926,247	1,073,221	718,979	548,150	6,428,490
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 8,007	$ 8,075	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 16,082
2025	$ 2,863	$ 5,889	$ 5,034	$ 6,159	$ 5,520	$ 8,112	$ 8,078	$ 8,045	$ 8,071	$ 8,100	$ 8,091	$ 8,045	$ 82,006
2024	$ 5,257	$ 5,740	$ 5,184	$ 4,933	$ 5,658	$ 5,589	$ 5,562	$ 10,336	$ 7,888	$ 7,034	$ 5,808	$ 5,345	$ 74,333
2023				$ 5,344	$ 3,017	$ 5,039	$ 5,994	$ 6,425	$ 6,379	$ 6,966	$ 5,631	$ 4,924	$ 49,720
2022													
2021													

Usage Revenue

		5/1/2025	Prior
		$0.00	$ 3.71

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$2,847	$2,026	$3,131	$2,460	$0	$0	$0	$0	$0	$0	$0	$10,465
2024	$2,313	$2,840	$2,242	$1,978	$2,533	$2,597	$2,582	$7,254	$4,814	$3,918	$2,797	$2,346	$38,213
2023				$2,572	$236	$2,200	$3,148	$3,574	$3,436	$3,982	$2,667	$2,034	$23,850
2022													
2021													

Fixed Revenue

		5/1/2025	Prior
		$25.00	$ 8.90

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$8,007	$8,075	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$16,082
2025	$2,863	$3,043	$3,007	$3,028	$3,059	$8,112	$8,078	$8,045	$8,071	$8,100	$8,091	$8,045	$71,542
2024	$2,944	$2,901	$2,943	$2,955	$3,124	$2,992	$2,981	$3,082	$3,074	$3,116	$3,011	$2,998	$36,121
2023				$2,773	$2,781	$2,839	$2,846	$2,850	$2,943	$2,985	$2,964	$2,891	$25,870
2022													
2021													

TN-Shiloh Falls Commercial Sewer

Commercial

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12				
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth	Monthly Avg Jul-Dec
2026	132	132	-	-	-	-	-	-	-	-	-	-	264	22	(85)	-
2025	81	63	68	68	66	151	132	132	132	132	132	132	776	107	43	132
2024	72	73	70	72	51	68	68	57	59	52	67	68	776	65	(7)	
2023				79	79	75	75	74	65	60	69	73	649	72		
2022																
2021																

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	-	-	-	-	-	-	-	-	-	-	-	-	-
2025	-	218,710	130,970	215,270	210,040	-	-	-	-	-	-	-	774,990
2024	275,470	208,220	226,380	165,150	303,740	203,450	203,450	345,980	228,140	300,180	158,090	245,080	2,863,330
2023				159,040	6,714	91,760	98,464	80,115	213,900	242,030	200,620	218,900	1,311,543
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 7,339	$ 7,339	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 14,678
2025	$ 721	$ 1,376	$ 1,094	$ 1,405	$ 1,367	$ 8,384	$ 7,339	$ 7,339	$ 7,339	$ 7,339	$ 7,339	$ 7,339	$ 58,382
2024	$ 1,663	$ 1,421	$ 1,467	$ 1,253	$ 1,580	$ 1,359	$ 1,359	$ 1,787	$ 1,367	$ 1,581	$ 1,181	$ 1,512	$ 17,530
2023				$ 1,289	$ 727	$ 1,008	$ 1,036	$ 959	$ 1,368	$ 1,435	$ 1,361	$ 1,464	$ 10,646
2022													
2021													

Usage Revenue

5/1/2025	Prior
$0.00	$ 3.71

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
2025	$0	$811	$486	$799	$779	$0	$0	$0	$0	$0	$0	$0	$2,875
2024	$1,022	$772	$840	$613	$1,127	$755	$755	$1,284	$846	$1,114	$587	$909	$10,623
2023				$590	$25	$340	$365	$297	$794	$898	$744	$812	$4,866
2022													
2021													

Fixed Revenue

5/1/2025	Prior
$55.60	$ 8.90

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$7,339	$7,339	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$14,678
2025	$721	$564	$608	$606	$588	$8,384	$7,339	$7,339	$7,339	$7,339	$7,339	$7,339	$55,507
2024	$641	$648	$627	$640	$453	$604	$604	$504	$521	$467	$594	$602	$6,907
2023				$699	$702	$667	$671	$661	$574	$537	$617	$652	$5,780
2022													
2021													

TN-The Bluffs at Cumberland Cove Sewer-Residential

Billing Determinate

	1	2	3	4	5	6	7	8	9	10	11	12			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2026	18	18	-	-	-	-	-	-	-	-	-	-	36	3	
2025						18	18	18	18	19	17	18	126	18	
2024															
2023															
2022															
2021															

Usage (gallons) (from Billed Analysis Report)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$ 505	$ 505	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,011
2025						$ 505	$ 505	$ 505	$ 505	$ 532	$ 477	$ 505	$ 3,536
2024													
2023													
2022													
2021													

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026													
2025													
2024													
2023													
2022													
2021													

Fixed Revenue $28.00

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2026	$505	$505	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$1,011
2025						$505	$505	$505	$505	$532	$477	$505	$3,536
2024													
2023													
2022													
2021													

Service	TN-Aqua Water
Class	Residential

Sum of Usage	Column Labels												
Row Labels	**20251**	**20252**	**20253**	**20254**	**20255**	**20256**	**20257**	**20258**	**20259**	**202510**	**202511**	**202512**	**Grand Total**
1"											-	250	250
2"	5,300	5,200	83,400	396,600	1,700	5,200	2,600	100	100		400	9,000	509,600
3/4"	3,870	4,600	5,960	20,380	45,950	67,040	58,070	48,950	98,910	83,670	73,430	22,100	532,930
5/8"	413,582	645,634	502,390	408,245	553,222	719,736	1,268,916	1,382,076	1,760,695	1,791,845	1,372,171	768,198	11,586,710
5/8" X 3/4"	170	1,530	1,020	1,000	3,260	3,340	6,300	50	3,180	10		10	19,870
Unknown	24,560	48,350	28,370	16,456	39,914	34,040	85,040	45,830	60,910	69,710	40,690	27,400	521,270
Grand Total	**447,482**	**705,314**	**621,140**	**842,681**	**644,046**	**829,356**	**1,420,926**	**1,477,006**	**1,923,795**	**1,945,235**	**1,486,691**	**826,958**	**13,170,630**
	447482	705314	621,140	842681	644046	829356	1420926	1477006	1923795	1945235	1486691	826958	13170630
	-	-	-	-	-	-	-	-	-	-	-	-	-

Muncipality	(Multiple Items)

Month	Sum of Charges	Sum of Adjustments	Sum of Penalties	
202510	142,627	(6,629)	1,251	
202511	141,940	(600)	781	
202512	142,085	(4)	749	
20256	155,756	(1,050)	369	
20257	156,054	(5,475)	1,812	
20258	152,428	(48)	1,558	
20259	152,618	(39,969)	1,358	
Grand Total	**1,043,509**	**(53,775)**	**7,879**	997,612

Month	(Multiple Items)
Muncipality	TN-Aqua

Account	Meter Size
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	1"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	5/8" X 3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	Unknown
[redacted]	3/4"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	Unknown
[redacted]	5/8"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	3/4"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	Unknown
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	1"
[redacted]	5/8"
[redacted]	5/8"
[redacted]	3/4"
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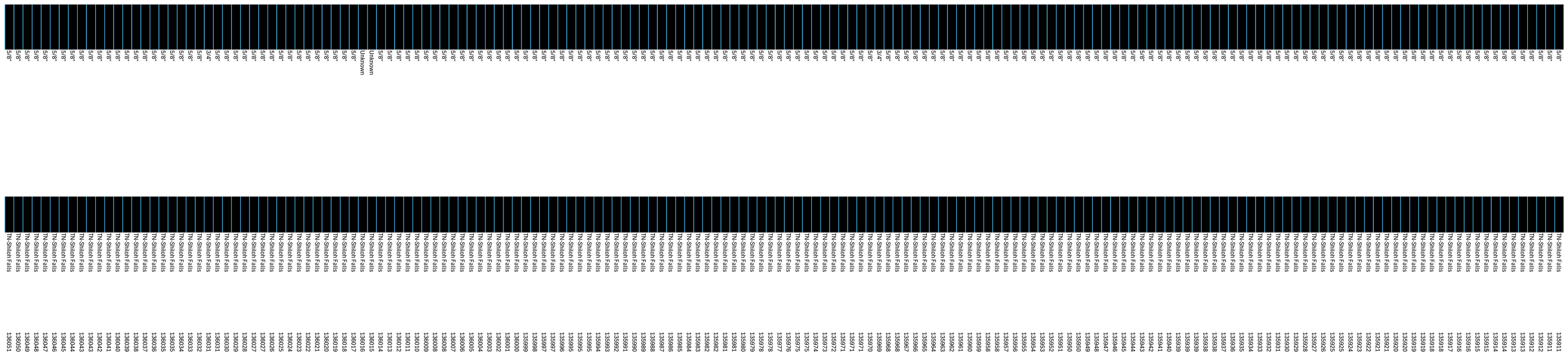

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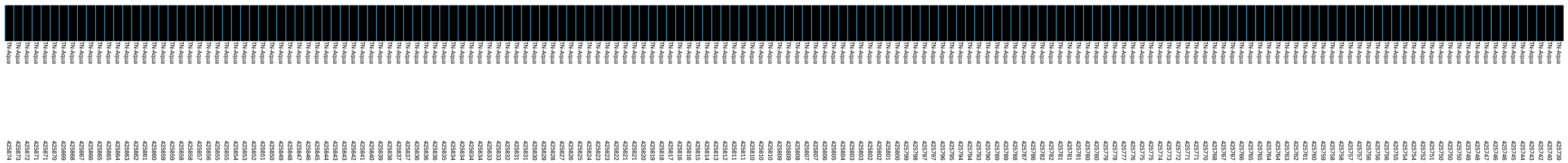

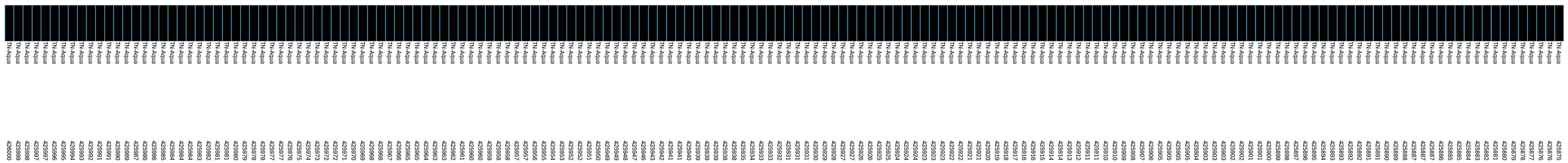

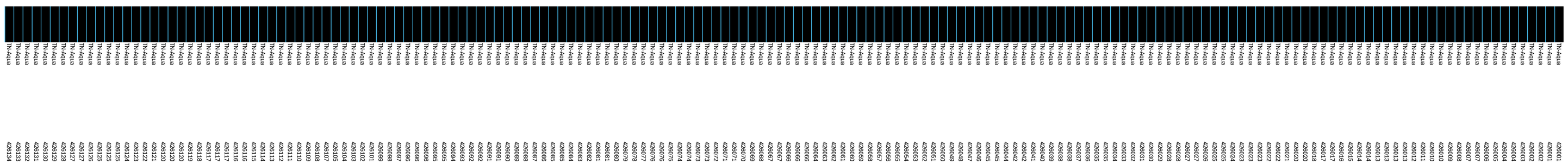
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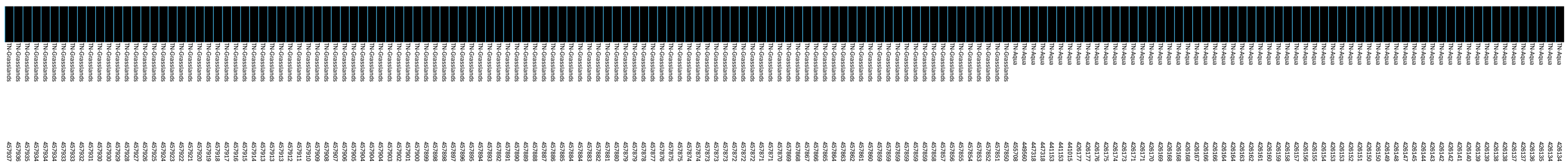

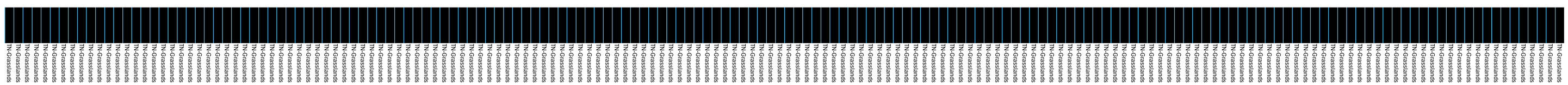

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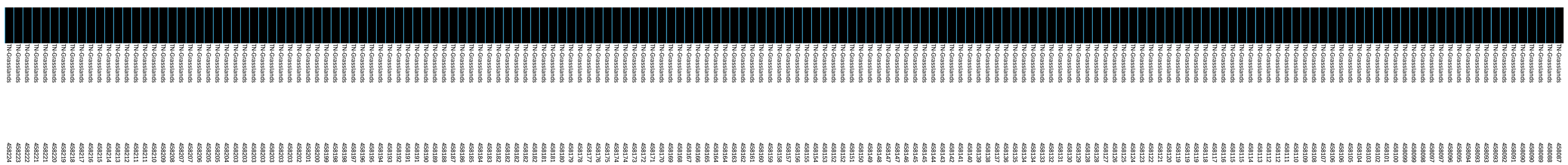
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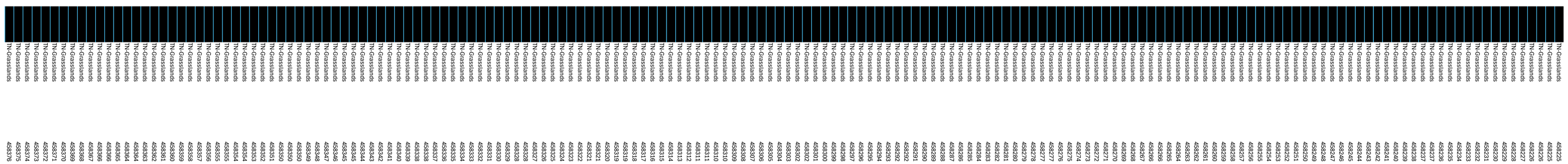

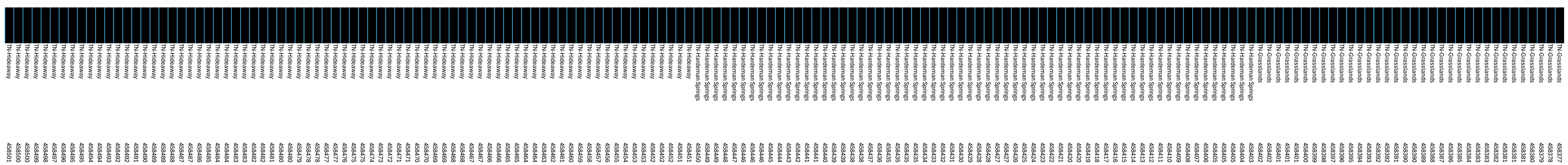

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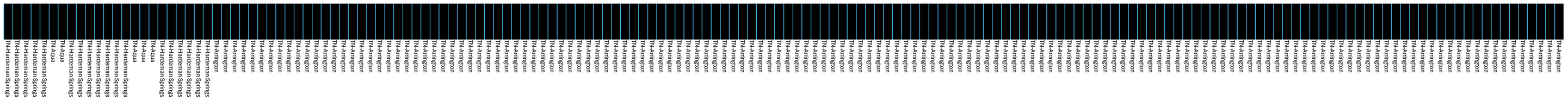

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[redacted]	TN-Hideaway	71496-
[redacted]	TN-Aqua	85697-
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[redacted]	TN-Hardeman Springs	

Public 1-9

Proposed Phase 2 Final Limestone Rate Design

TN-Limestone

June - December 2025

Billed Revenue

Exhibit AJS-1: Revenue Summary

	Revenue						
Water	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Candlewood	$5,863	$5,860	$5,875	$5,818	$5,938	$5,850	$5,874
Aqua Utilities- 5/8"	$16,139	$18,023	$18,320	$19,413	$19,520	$17,998	$16,292
Aqua Utilities- 3/4"	$1,019	$1,151	$926	$1,211	$1,230	$1,073	$871
Aqua Utilities- 1"	$413	$245	$353	$366	$209	$205	$390
Aqua Utilities- 1 1/2"	$39	$106	$266	$318	$259	$295	$101
Aqua Utilities- 2"	$52	$47	$38	$37	$3	$35	$65
Aqua Utilities- unknown	$744	$924	$749	$832	$835	$757	$719
Total Water	$24,268	$26,354	$26,527	$27,995	$27,993	$26,213	$24,311
Sewer							
Aqua Utilities-Residential	$15,974	$12,141	$14,076	$14,048	$14,033	$14,042	$14,136
Aqua Utilities-Commercial	$1,303	$1,303	$1,303	$1,303	$1,303	$1,268	$1,268
Cartwright - Grassland - Comm 1-2 Bedroom	$0	$0	$0	$0	$0	$0	$0
Cartwright - Grassland - Res 1-2 Bedroom	$2,455	$2,526	$2,564	$2,627	$2,306	$2,283	$2,254
Cartwright - Grassland - Res 3 Bedroom	$20,387	$20,310	$20,265	$20,301	$20,283	$20,041	$20,341
Cartwright - Grassland - Res 4 Bedroom	$14,802	$14,891	$14,958	$14,673	$14,796	$14,733	$14,813
Cartwright - Grassland - Res 5 Bedroom	$622	$622	$626	$626	$622	$622	$643
Cartwright - Commercial	$34,965	$36,196	$35,807	-$4,250	$19,662	$24,240	$24,363
Cartwright - Arrington/Hardeman/Hideaway -Res	$34,062	$33,699	$34,013	$34,065	$33,555	$34,225	$34,378
Chapel Woods	$6,064	$6,101	$6,162	$6,176	$6,100	$6,139	$6,116
Shiloh Falls - Residential	$9,000	$8,966	$8,887	$8,958	$8,984	$8,974	$8,923
Shiloh Falls - Commercial	$7,356	$7,464	$7,464	$7,464	$7,464	$7,464	$7,464
Lakeside Estates (DSH) - Commercial	$7,739	$7,825	$7,462	$7,663	$7,663	$7,663	$7,663
Lakeside Estates (DSH) - Residential	$345	$348	$350	$352	$478	$427	$465
Total Sewer	$155,075	$152,391	$153,938	$114,007	$137,250	$142,122	$142,830
Total Billed Revenue	$179,343	$178,745	$180,464	$142,003	$165,243	$168,335	$167,141

TN-Limestone

AJS-2: Billing Determinants

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

LIMESTONE WATER OPERATING COMPANY
Rate Design Exhibit 1, Page 1 Phase 2

	Filed Determinants (Customers)	Phase 1 Rate	Phase 1 Calculated Revenue	2025 Actual Determinants (Customers)	Calculated Revenue Based on 2025 Determinants	Phase 2 Attrition Determinants (Customers)	Phase 2 Proposed Rate	Phase 2 Calculated Revenues	Phase 2 Revenue Increase
Water									
Candlewood	1,452	$50.00	$72,600	1,262	$63,100	1,262	$85.80	$108,237	$35,637
Aqua Utilities- 5/8"	5,016	$31.00	$155,496	4,787	$148,397	4,787	$46.86	$224,318	$68,822
Aqua Utilities- 3/4"	120	$31.00	$3,720	234	$7,254	234	$46.86	$10,980	$7,260
Aqua Utilities- 1"	12	$31.00	$372	88	$2,728	88	$46.86	$4,106	$3,734
Aqua Utilities- 1 1/2"	12	$31.00	$372	12	$372	12	$46.86	$559	$187
Aqua Utilities- 2"	36	$31.00	$1,116	10	$310	10	$46.86	$479	-$637
Aqua Utilities- unknown	228	$31.00	$7,068	218	$6,758	218	$46.86	$10,237	$3,169
Usage:									
Candlewood - No meter - (Flat Rate)	0		$0	0	$0	0		$0	$0
Aqua Utilities - usage per 1,000 gallons	21,240,360	$3.05	$64,783	14,033,940	$42,804	14,033,940	$3.05	$42,804	-$21,980
Total Bill Revenue	**6,876**		**$305,527**	**6,611**	**$271,723**	**6,611**		**$401,721**	**$96,194**
Sewer									
Aqua Utilities-Residential	4,440	$35.00	$155,400	4,507	$157,733	4,507	$46.70	$210,447	$55,047
Aqua Utilities-Commercial	432	$35.00	$15,119	441	$15,420	444	$46.70	$20,733	$5,614
Cartwright - Grassland - Comm 1-2 Bedroom	0	$0.00	$0	0	$0	0	$0.00	$0	$0
Cartwright - Grassland - Res 1-2 Bedroom	408	$65.00	$26,520	424	$27,580	424	$84.74	$35,954	$9,434
Cartwright - Grassland - Res 3 Bedroom	3,348	$70.00	$234,360	3,336	$233,547	3,336	$95.23	$317,733	$83,373
Cartwright - Grassland - Res 4 Bedroom	2,304	$75.00	$172,800	2,277	$170,759	2,277	$102.84	$234,134	$61,334
Cartwright - Grassland - Res 5 Bedroom	96	$75.00	$7,200	96	$7,220	96	$102.84	$9,900	$2,700
Cartwright - Commercial	2,496	$168.96	$421,712	1,713	$289,462	2,736	$208.97	$571,734	$150,022
Cartwright - Arrington/Hardeman/Hideaway -Res	5,316	$75.00	$398,700	5,144	$385,820	5,144	$105.08	$540,536	$141,836
Chapel Woods	1,740	$40.00	$69,600	1,695	$67,815	1,695	$55.66	$94,360	$24,760
Shiloh Falls - Residential	3,816	$25.00	$95,400	3,947	$98,677	3,947	$32.77	$129,338	$33,938
Shiloh Falls - Commercial	1,644	$55.60	$91,406	768	$42,701	756	$163.92	$123,924	$32,518
Lakeside Estates (DSH) - Commercial	1,716	$55.00	$94,384	1,645	$90,451	2,232	$57.60	$128,556	$34,172
Lakeside Estates (DSH) - Residential	60	$55.00	$3,300	67	$3,704	67	$57.60	$3,879	$579
Total Bill Revenue	**27,816**		**$1,785,901**	**26,061**	**$1,590,887**	**27,662**		**$2,421,229**	**$635,328**
Imputed Cartwright - Commercial			**$91,230**		**$0**			**$0**	
Other Revenue: Staff Rate Design Exhibit 1, Page 2			**$231,599**		**$231,599**			**$231,599**	
Surcharge Carrying Cost									
Water						**19832**	**$0.41**	**$8,165**	
Sewer						**82987**	**$0.56**	**$46,183**	
Totals			**$2,414,257**		**$2,094,208**			**$3,108,897**	**$731,522**

Overall Staff Revenue Deficiency	$	$	$ **$1,362,324**
Phase One Increase of Rate Design			**53.00%**
Revenue Needed From Phase One			**$722,032**
Phase Two Increase			**$640,292**

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

LIMESTONE WATER OPERATING COMPANY
Commission Rate Rate Design Exhibit 1, Page 1

	Base Year Determinants (Customers)	Current Average Bill Rate	Base Year Revenue	Attrition Determinants (customers)	Proposed Rate	Attrition Period Revenues	Revenue Increase	Sewer Revenue Increase (63.61%)
Water								
Candlewood	1,452 A/	40.00	58,080	1,452	50.00	72,600	14,520	
Aqua Utilities- 5/8"	5,016 A/	25.62 B/	128,519	5,016	31.00	155,496	26,977	
Aqua Utilities- 3/4"	120 A/	25.62 B/	3,075	120	31.00	3,720	645	
Aqua Utilities- 1"	12 A/	25.62 B/	307	12	31.00	372	65	
Aqua Utilities- 1 1/2"	12 A/	25.62 B/	307	12	31.00	372	65	
Aqua Utilities- 2"	36 A/	25.62 B/	922	36	31.00	1,116	194	
Aqua Utilities- unknown	228 A/	25.62 B/	5,842	228	31.00	7,068	1,226	
Usage:								
Candlewood - No meter - (Flat Rate)	0	0.00	0	0		0	0	
Aqua Utilities - usage per 1,000 gallons	0	3.05	0	21,240,360 C/	3.05	64,783	64,783	
Total Bill Revenue			**$197,053**	(1770030*12) D/		**$305,527**	**$108,474**	
Sewer								
Aqua Utilities-Residential	4,440	25.62	113,761	4,440	35.00	155,400	41,639	
Aqua Utilities-Commercial	96	25.62	2,460	432	35.00	15,119	12,660	21,427
Cartwright - Grassland - Comm 1-2 Bedroom	24	62.88	1,509	0	N/A	0	-1,509	0
Cartwright - Grassland - Res 1-2 Bedroom	408	42.00	17,136	408	65.00	26,520	9,384	
Cartwright - Grassland - Res 3 Bedroom	3,348	46.50	155,682	3,348	70.00	234,360	78,678	
Cartwright - Grassland - Res 4 Bedroom	2,304	52.00	119,808	2,304	75.00	172,800	52,992	
Cartwright - Grassland - Res 5 Bedroom	96	55.25	5,304	96	75.00	7,200	1,896	
Cartwright - Commercial	612	472.64	289,259	2,496	168.96	421,712	132,454	597,642
Cartwright - Arrington/Hardeman/Hideaway -Res	5,316	55.25	293,709	5,316	75.00	398,700	104,991	
Chapel Woods	1,740	29.00	50,460	1,740	40.00	69,600	19,140	
Shiloh Falls - Residential	3,816	8.93	34,094	3,816	25.00	95,400	61,306	
Shiloh Falls - Commercial	108	517.29	55,868	1,644	55.60	91,406	35,539	129,539
Lakeside Estates (DSH) - Commercial	600	52.42	31,452	1,716	55.00	94,384	62,932	133,760
Lakeside Estates (DSH) - Residential	60	30.73 F/	1,844	60	55.00	3,300	1,456	
Total Bill Revenue	**$22,968**		**$1,172,345**	**$27,816**		**$1,785,903**	**$613,558**	**$882,368**
Imputed Cartwright - Commercial	**10,426**	**$8.75**	**$91,230** E/	0.00		**$91,230**		
Other Revenue: Staff Rate Design Exhibit 1, Page 2			**$231,599**			**$231,599**		
Totals			**1,692,227**			**Residential Water Increase**		**108,474**
						Residential Sewer Increase		**371,482**
						Commercial Sewer Increase		**882,368**
						Total Increase		**$1,362,324**

Overall Staff Revenue Deficiency	$ **$1,362,324**		
Phase One Increase of Rate Design	**100.00%**		
Revenue Needed From Phase One	**$1,362,324**	722,032	
Increase Without Commercial Sewer	**$479,956**	**(108,474 + 371,482)**	
Increase Needed From Commercial Sewer	**$882,368**	**(722,032 - 479,076)**	
Current Sewer Revenue	**$622,623**		
Percent Increase From Commercial Sewer	**141.72%**		

Overall Deficiency	$	1,362,324
Rate of Return		8.488%
Phase 1 Increase	$	722,031.72
Phase 2 Increase	$	640,292.28
Carrying Costs	$	54,348.01

Account Numb	Acct Status	Name	Service Address	Facility Type	Design Basis	Units (Design Bas	Service	Service Type	Status	ERU	Current ERU	ERU Difference	Address Type	Line Size	Municipality	Proposed Phase 2 Invoi
REDACTED	Active	REDACTED	REDACTED	Country Club	Guests	100	Aqua Utilities-Commercial	Sewer	Active	33	33	0	Commercial	1"	TN-Aqua	1541.00018
REDACTED	Active	REDACTED	REDACTED	Swimming Pool	Employee	10	Aqua Utilities-Commercial	Sewer	Active	1	1	0	Commercial	5/8"	TN-Aqua	46.69697515
REDACTED	Active	REDACTED	REDACTED	Office	Employee	5	Aqua Utilities-Commercial	Sewer	Active	1	1	0	Commercial	5/8"	TN-Aqua	46.69697515
REDACTED	Active	REDACTED	REDACTED	Office	Employee	1	Aqua Utilities-Commercial	Sewer	Active	1	1	0	Commercial	5/8"	TN-Aqua	46.69697515
REDACTED	Active	REDACTED	REDACTED	w cafeteria, gym showers	Student	883	Cartwright - Commercial	Sewer	Active	74	36	38	Commercial		TN-Grasslands	15463.57873
REDACTED	Active	REDACTED	REDACTED	w cafeteria, gym showers	Student	518	Cartwright - Commercial	Sewer	Active	43	21	22	Commercial		TN-Grasslands	8985.593049
REDACTED	Active	REDACTED	REDACTED	Country Club	Guests	45	Cartwright - Commercial	Sewer	Active	15	1	14	Commercial		TN-Hideaway	3134.509203
REDACTED	Active	REDACTED	REDACTED	Department Store	Toilet Room	1	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Department Store	Toilet Room	1	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Department Store	Toilet Room	1	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Department Store	Toilet Room	1	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Industrial Building	Employee	50	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Office	Employee	40	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Public Lavatory	User	100	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Hideaway	417.9345604
REDACTED	Active	REDACTED	REDACTED	Public Lavatory	User	100	Cartwright - Commercial	Sewer	Active	2	1	1	Commercial		TN-Hideaway	417.9345604
REDACTED	Active	REDACTED	REDACTED	Country Club	Guests	60	Cartwright - Commercial	Sewer	Active	20	20	0	Commercial		TN-Grasslands	4179.345604
REDACTED	Active	REDACTED	REDACTED	Hospital	Bed	40	Cartwright - Commercial	Sewer	Active	13	13	0	Commercial		TN-Grasslands	2716.574643
REDACTED	Active	REDACTED	REDACTED	w cafeteria only	Student	60	Cartwright - Commercial	Sewer	Active	3	3	0	Commercial		TN-Grasslands	626.9018406
REDACTED	Active	REDACTED	REDACTED	Church	Seat	200	Cartwright - Commercial	Sewer	Active	2	2	0	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Assembly Hall	Seat	50	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Assembly Hall	Seat	30	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Automobile Service Station	Employee	8	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Automobile Service Station	Employee	6	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Automobile Service Station	Employee	3	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Bar	Employee	3	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Hideaway	208.9672802
REDACTED	Active	REDACTED	REDACTED	Church	Seat	100	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Church	Seat	100	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Industrial Building	Employee	2	Cartwright - Commercial	Water	Active	1	1	0	Commercial		TN-Hideaway	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	20	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	12	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	14	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	10	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	7	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	7	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	5	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	5	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	5	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	3	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	2	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Office	Employee	2	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Public Lavatory	User	10	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Arrington	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	20	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	10	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	5	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	5	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	5	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	4	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	10	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	2	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Short Order	Customer	30	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Short Order	Customer	25	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Short Order	Customer	10	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Visitor Center	Visitor	30	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Hardeman Springs	208.9672802
REDACTED	Active	REDACTED	REDACTED	Visitor Center	Visitor	10	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Grasslands	208.9672802
REDACTED	Active	REDACTED	REDACTED	Country Club	Guests	50	Cartwright - Commercial	Sewer	Active	1	1	0	Commercial		TN-Hideaway	208.9672802
REDACTED	Active	REDACTED	REDACTED	Visitor Center	Visitor	100	Cartwright - Commercial	Sewer	Active	2	3	-1	Commercial		TN-Grasslands	417.9345604
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	32	Lakeside Estates (DSH) - C	Sewer	Active	5	2	3	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Sewer	Active	5	2	3	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Sewer	Active	5	2	3	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Sewer	Active	5	2	3	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	31	Lakeside Estates (DSH) - C	Sewer	Active	5	2	3	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	24	Lakeside Estates (DSH) - C	Sewer	Active	4	1	3	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	38	Lakeside Estates (DSH) - C	Sewer	Active	6	4	2	Commercial	Unknown	TN-DSH	345.581046
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Sewer	Active	5	3	2	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	22	Lakeside Estates (DSH) - C	Sewer	Active	4	2	2	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	2	2	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	22	Lakeside Estates (DSH) - C	Sewer	Active	4	2	2	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	22	Lakeside Estates (DSH) - C	Sewer	Active	4	2	2	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	1	2	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	1	2	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	1	2	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Sewer	Active	5	4	1	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Water	Active	5	4	1	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	28	Lakeside Estates (DSH) - C	Sewer	Active	5	4	1	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	23	Lakeside Estates (DSH) - C	Sewer	Active	4	3	1	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	24	Lakeside Estates (DSH) - C	Sewer	Active	4	3	1	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	3	1	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	3	1	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	17	Lakeside Estates (DSH) - C	Sewer	Active	3	2	1	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	30	Lakeside Estates (DSH) - C	Sewer	Active	5	5	0	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	30	Lakeside Estates (DSH) - C	Sewer	Active	5	5	0	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	30	Lakeside Estates (DSH) - C	Sewer	Active	5	5	0	Commercial	Unknown	TN-DSH	287.984205
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	24	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	25	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364

Row Labels	Sum of ERU	
TN-Aqua	37	444
TN-Arrington	1	12
TN-DSH	186	2232
TN-Grasslands	204	2448
TN-Hardeman Springs	1	12
TN-Hideaway	22	264
TN-Shiloh Falls	63	756
Grand Total	**514**	

REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	26	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	24	Lakeside Estates (DSH) - C	Sewer	Active	4	4	0	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	20	Lakeside Estates (DSH) - C	Sewer	Active	3	3	0	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	20	Lakeside Estates (DSH) - C	Sewer	Active	3	3	0	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	16	Lakeside Estates (DSH) - C	Sewer	Active	3	3	0	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	10	Lakeside Estates (DSH) - C	Sewer	Active	2	2	0	Commercial	Unknown	TN-DSH	115.193682
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	8	Lakeside Estates (DSH) - C	Sewer	Active	1	1	0	Commercial	Unknown	TN-DSH	57.59684101
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	8	Lakeside Estates (DSH) - C	Sewer	Active	1	1	0	Commercial	Unknown	TN-DSH	57.59684101
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	8	Lakeside Estates (DSH) - C	Sewer	Active	1	1	0	Commercial	Unknown	TN-DSH	57.59684101
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	25	Lakeside Estates (DSH) - C	Sewer	Active	4	5	-1	Commercial	Unknown	TN-DSH	230.387364
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	16	Lakeside Estates (DSH) - C	Sewer	Active	3	5	-2	Commercial	Unknown	TN-DSH	172.790523
REDACTED	Active	REDACTED	REDACTED	Apartment House	Person	10	Lakeside Estates (DSH) - C	Sewer	Active	2	5	-3	Commercial	Unknown	TN-DSH	115.193682
REDACTED	Active	REDACTED	REDACTED	Office	Employee	60	Cartwright - Commercial	Sewer	Active	3	2	1	Commercial		TN-Grasslands	626.9018406
REDACTED	Active	REDACTED	REDACTED	Country Club	Guests	100	Shiloh Falls - Commercial	Sewer	Active	33	33	0	Commercial	Unknown	TN-Shiloh Falls	5409.381189
REDACTED	Active	REDACTED	REDACTED	Hotel	Guests	90	Shiloh Falls - Commercial	Sewer	Active	15	15	0	Commercial	Unknown	TN-Shiloh Falls	2458.809632
REDACTED	Active	REDACTED	REDACTED	Hotel	Guests	47.5	Shiloh Falls - Commercial	Sewer	Active	8	8	0	Commercial	Unknown	TN-Shiloh Falls	1311.365137
REDACTED	Active	REDACTED	REDACTED	Office	Employee	10	Shiloh Falls - Commercial	Sewer	Active	1	1	0	Commercial	Unknown	TN-Shiloh Falls	163.9206421
REDACTED	Active	REDACTED	REDACTED	Office	Employee	2	Shiloh Falls - Commercial	Sewer	Active	1	1	0	Commercial	Unknown	TN-Shiloh Falls	163.9206421
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	10	Shiloh Falls - Commercial	Sewer	Active	1	1	0	Commercial	Unknown	TN-Shiloh Falls	163.9206421
REDACTED	Active	REDACTED	REDACTED	Shopping Center	Employee	8	Shiloh Falls - Commercial	Sewer	Active	1	1	0	Commercial	Unknown	TN-Shiloh Falls	163.9206421
REDACTED	Active	Shiloh Falls Homeowners Assoc.	95 St Andrews Ct -Pool Counce,TN 38326	Swimming Pool	Employee	10	Shiloh Falls - Commercial	Sewer	Active	1	1	0	Commercial	Unknown	TN-Shiloh Falls	163.9206421
REDACTED	Active	Matrix Real Estate	Riverwalk Villas Counce,TN 38326	Apartment House	Person	9	Shiloh Falls - Commercial	Sewer	Active	2	8	-6	Commercial	Unknown	TN-Shiloh Falls	327.8412842

Public Updated 1-18

Design Basis Support

Activity Type	Charge Basis	Unit Price (Labor)	Hours/Qty	Source/Comment
Apartment House	Person		8.79 Person-Hrs	[redacted]
Apartment House	Person		25 %/Dim	[redacted]
Apartment House	Person		30 %/Dim	[redacted]
Apartment House	Person		55 %/Dim	[redacted]
Apartment House	Person		30 %/Dim	[redacted]
Apartment House	Person		30 %/Dim	[redacted]
Apartment House	Person		10 %/Dim	[redacted]
Apartment House	Person		24 %/Dim	[redacted]
Apartment House	Person		24 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		24 %/Dim	[redacted]
Apartment House	Person		24 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		20 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		24 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26 %/Dim	[redacted]
Apartment House	Person		26

Route/Seq	Account Number	Name	Facility Type	Design Basis	Units (Design Basis)	Municipality	Source/Comment
TN-DSH-1/ 0	[redacted]		Apartment House	Person	17	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	17	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	22	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	17	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	17	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	28	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	31	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	17	TN-DSH	Based on its review, and with consideration of comparable neighboring properties as supporting data, Limestone has determined the ERU basis to be 17, based on the property configuration of 6 bedrooms and 6 bathrooms (sleeps 17).
TN-DSH-1/ 0	[redacted]		Apartment House	Person	8	TN-DSH	Based on its review, and with consideration of comparable neighboring properties as supporting data, Limestone has determined the ERU basis to be 8, based on the property configuration of 3 bedrooms and 2 bathrooms (sleeps 8).
TN-DSH-1/ 0	[redacted]		Apartment House	Person	8	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	8	TN-DSH	[redacted]
TN-DSH-1/ 0	[redacted]		Apartment House	Person	24	TN-DSH	[redacted]
TN-UNM/ 0	[redacted]		Assembly Hall	Seat	50	TN-Grasslands	
TN-UNM/ 1	[redacted]		Assembly Hall	Seat	30	TN-Grasslands	
TN-UNM/ 1	[redacted]		Automobile Service Station	Employee	8	TN-Grasslands	https://grasslandscare.com/about/
TN-UNM/ 1	[redacted]		Automobile Service Station	Employee	6	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Automobile Service Station	Employee	3	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Bar	Employee	3	TN-Hideaway	[redacted]
TN-UNM/ 1	[redacted]		Church	Seat	200	TN-Grasslands	https://grasslandheights.org/
TN-UNM/ 1	[redacted]		Church	Seat	100	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Church	Seat	100	TN-Grasslands	[redacted]
TN-AQ-1/ 0	[redacted]		Country Club	Guests	100	TN-Aqua	https://www.thepreservatorywick.com/pickwick-lake-waterfront-property/amenities/ Golf simulator room, indoor basketball court, hydromassage room, fitness center, movie theatre, etc
TN-SF-1/ 0	[redacted]		Country Club	Guests	100	TN-Shiloh Falls	[redacted]
TN-UNM/ 1	[redacted]		Country Club	Guests	60	TN-Grasslands	Email Chain w Silas / Glenn Taylor
TN-UNM/ 1	[redacted]		Country Club	Guests	45	TN-Hideaway	[redacted]
TN-UNM/ 1	[redacted]		Department Store	Toilet Room	1	TN-Grasslands	1 Toilet per suite
TN-UNM/ 1	[redacted]		Department Store	Toilet Room	1	TN-Grasslands	1 Toilet per suite
TN-UNM/ 1	[redacted]		Department Store	Toilet Room	1	TN-Grasslands	1 Toilet per suite
TN-UNM/ 1	[redacted]		Department Store	Toilet Room	1	TN-Grasslands	1 Toilet per suite
TN-UNM/ 1	[redacted]		Hospital Meintal	Bed	40	TN-Grasslands	https://www.heritagemedical.com/locations/grassland-office/
TN-SF-1/ 0	[redacted]		Hotel	Guests	90	TN-Shiloh Falls	[redacted]
TN-SF-1/ 0	[redacted]		Hotel	Guests	47.5	TN-Shiloh Falls	https://stonebrook-inn.hotels-tennessee.com/en/
TN-UNM/ 1	[redacted]		Industrial Building	Employee	50	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Industrial Building	Employee	2	TN-Hideaway	Assuming this is a maintenance work shed for golf course turf.
TN-UNM/ 0	[redacted]		Office	Employee	60	TN-Grasslands	https://www.loopnet.com/Listing/1200-Old-Hillsboro-Rd-Franklin-TN/31418763/
TN-UNM/ 1	[redacted]		Office	Employee	40	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Office	Employee	20	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Office	Employee	12	TN-Grasslands	https://www.beauchampsmithospital.com/
TN-UNM/ 1	[redacted]		Office	Employee	14	TN-Grasslands	[redacted]
TN-SF-1/ 0	[redacted]		Office	Employee	10	TN-Shiloh Falls	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	10	TN-Grasslands	Estimate; 1 ERU based on size
TN-AQ-1/ 1	[redacted]		Office	Employee	10	TN-Aqua	Estimate; 1 ERU based on size
TN-UNM/ 0	[redacted]		Office	Employee	8	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	7	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	7	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	5	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	5	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	5	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	3	TN-Grasslands	Estimate; 1 ERU based on size
TN-SF-1/ 0	[redacted]		Office	Employee	2	TN-Shiloh Falls	HOA Entry Gate - Most likely 1 toilet
TN-UNM/ 1	[redacted]		Office	Employee	2	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Office	Employee	2	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Public Lavatory	User	10	TN-Arrington	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Public Lavatory	User	100	TN-Hideaway	[redacted]
TN-UNM/ 1	[redacted]		Public Lavatory	User	100	TN-Hideaway	[redacted]
TN-UNM/ 1	[redacted]		Shopping Center	Employee	20	TN-Grasslands	Estimate; 1 ERU based on size
TN-SF-1/ 0	[redacted]		Shopping Center	Employee	10	TN-Shiloh Falls	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Shopping Center	Employee	10	TN-Grasslands	Estimate; 1 ERU based on size
TN-SF-1/ 0	[redacted]		Shopping Center	Employee	8	TN-Shiloh Falls	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Shopping Center	Employee	5	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Shopping Center	Employee	5	TN-Grasslands	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Shopping Center	Employee	5	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Shopping Center	Employee	4	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Shopping Center	Employee	10	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Shopping Center	Employee	2	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Short Order	Customer	30	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Short Order	Customer	25	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Short Order	Customer	10	TN-Grasslands	Based on it's review, this is a drive through only resturant that does have a public mens and womens restroom.
TN-SF-1/ 0	[redacted]		Swimming Pool	Employee	10	TN-Shiloh Falls	[redacted]
TN-AQ-1/ 315	[redacted]		Swimming Pool	Employee	10	TN-Aqua	Estimate; 1 ERU based on size
TN-UNM/ 1	[redacted]		Visitor Center	Visitor	100	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		Visitor Center	Visitor	30	TN-Hardeman Springs	[redacted]
TN-UNM/ 1	[redacted]		Visitor Center	Visitor	10	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		w cafeteria only	Student	60	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		w cafeteria, gym showers	Student	883	TN-Grasslands	[redacted]
TN-UNM/ 1	[redacted]		w cafeteria, gym showers	Student	518	TN-Grasslands	[redacted]

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

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

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

VERIFICATION

STATE OF Missouri)

COUNTY OF St. Louis)

I, AARON SILAS, being duly sworn, state that I am authorized to testify on behalf of Limestone Water Utility Operating Company, LLC, in the above-referenced docket, that if present before the Commission and duly sworn, 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 17th day of April, 2026.

Roshawne Vallandingham
Notary Public

ROSHAWNE VALLANDINGHAM
Notary Public - Notary Seal
Jefferson County - State of Missouri
Commission Number 23414639
My Commission Expires Apr 10, 2027

My Commission expires: 04-10-2027

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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:

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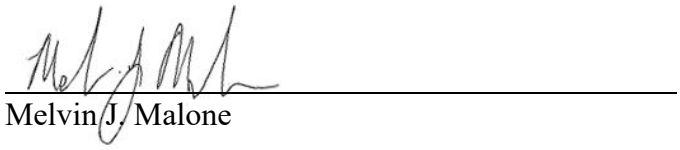
This the 17th day of April 2026.



Melvin J. Malone