

# TENNESSEE PUBLIC UTILITY COMMISSION



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

May 1, 2025

Mr. Billy Cox ([irmutility@gmail.com](mailto:irmutility@gmail.com))  
Integrated Resource Management, Inc.  
3444 Saint Andrews Drive  
White Pine, TN 37890

Electronically Filed in TPUC Docket  
Room on May 1, 2025 at 3:55 p.m.

Mr. Charles Welch ([Chuck.Welch@phelps.com](mailto:Chuck.Welch@phelps.com))  
Ms. Rochelle Brickle ([Rochelle.Brickle@phelps.com](mailto:Rochelle.Brickle@phelps.com))  
Phelps Dunbar, LLP  
414 Union Street, Suite 1105  
Nashville, TN 37219

*Sent via Email*

**Re: Docket No. 25-00023, *Petition of Integrated Resource Management, Inc. for Approval to Withdraw Escrow Funds.***

Dear Mr. Cox, et. al:

To assist the Commission in its ongoing investigation into the above referenced docket, it is requested that responses be provided to the following:

Please refer to the Direct Testimony of Jeffrey W. Cox, Jr., pages 3 and 4, which expresses that the requested labor and materials costs (\$29,504.18), as well as the associative legal and administrative costs (\$4,250) necessary to file this Petition, are not included in base rates.

Please refer to the attached Staff Workpaper 4.01 that was attached to the Direct Testimony of Craig Cox filed in Docket No. 24-00073, which shows an aggregate cost of \$106,218 for accounting, legal, clerical, and other professional services included in base rates effective January 1, 2025.

In light of the foregoing, please provide a detailed explanation, as well as any supporting analysis and documentation, that supports the Company's assertion that the requested administrative and/or legal costs associated with a petition to withdraw escrow funds have not been included in base rates effective January 1, 2025.

Provide all responses no later than 2:00 p.m. on Friday, May 9, 2025. Responses may be submitted electronically at [tpuc.docketroom@tn.gov](mailto:tpuc.docketroom@tn.gov) with one hard copy mailed to the Docket Manager at the Tennessee Public Utility Commission, 502 Deaderick Street, 4<sup>th</sup> Floor, Nashville, Tennessee 37243.

Contact David Foster at [David.Foster@tn.gov](mailto:David.Foster@tn.gov) or at (615) 770-6884 should you have questions or need clarification of the request for information. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "David N. Foster". The signature is written in a cursive, slightly slanted style.

David Foster, Director  
Utilities Division

C: Docket File