

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

October 14, 2025

IN RE:

PETITION OF INTEGRATED RESOURCE  
MANAGEMENT, INC. D/B/A IRM UTILITY FOR  
APPROVAL TO WITHDRAW ESCROW FUNDS

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DOCKET NO.  
25-00023

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ORDER APPROVING INTEGRATED RESOURCE MANAGEMENT, INC.'S AMENDED  
PETITION TO WITHDRAW ESCROW FUNDS

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This matter came before Chairman David F. Jones, Vice Chairman John Hie, Commissioner Herbert H. Hilliard, Commissioner Robin L. Morrison, and Commissioner Kenneth C. Hill of the Tennessee Public Utility Commission (the “Commission” or “TPUC”), the voting panel assigned to this docket, during a regularly scheduled Commission Conference held on September 15, 2025. The panel convened to consider the *Amended Petition of Integrated Resource Management, Inc. d/b/a IRM Utility for Approval to Withdraw Escrow Funds* (“*Amended Petition*”) filed by Integrated Resource Management, Inc., d/b/a IRM Utility (“IRM” or “Company”), on August 19, 2025.<sup>1</sup> In its *Amended Petition*, IRM is seeking approval to withdraw \$22,956.43 from the Company’s escrow account to recover extraordinary expenses and/or expenses for necessary capital projects incurred during the period of June 2024 to October 2024.<sup>2</sup>

**I. BACKGROUND**

IRM operates a public utility providing wastewater services to 274 customers via 13 systems in Tennessee in accordance with T.C.A. §65-4-101.<sup>3</sup> On March 28, 2025, IRM filed a *Petition* seeking

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<sup>1</sup> *Amended Petition* (August 19, 2025).

<sup>2</sup> *Id.* at 5.

<sup>3</sup> *Id.* at 1.

approval to withdraw \$33,754.18 from its escrow account, which included \$29,504.18 for the cost of materials and services rendered and \$4,250 for administrative and legal expenses associated with preparing and filing the *Petition*.<sup>4</sup>

The Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate") filed a *Petition to Intervene* on April 25, 2025, which the Administrative Judge granted by an order entered on August 25, 2025.<sup>5</sup> On August 12, 2025, upon the request of the Consumer Advocate and IRM, members of Commission Staff ("Party Staff") were designated as a party to the proceeding.<sup>6</sup>

On August 19, 2025, IRM filed its *Amended Petition* requesting reimbursement of \$22,956.43 from the Company's escrow account to recover extraordinary expenses and/or expenses for necessary capital projects incurred during the period of June 2024 to October 2024.<sup>7</sup> In response to the *Amended Petition*, the Consumer Advocate filed a letter stating that the Parties reached an agreement and that no outstanding issues remain related to IRM's petition to withdraw escrow funds. The letter confirms that the Consumer Advocate, following collaborative discussions with the Company and Party Staff, reviewed the *Amended Petition* filed on August 19, 2025, and identified no remaining concerns, stating that it would not submit testimony in the docket.<sup>8</sup> In light of this resolution, Party Staff moved to withdraw from the docket.<sup>9</sup> The Administrative Judge granted Party Staff's withdrawal on September 10, 2025.<sup>10</sup>

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<sup>4</sup> *Petition of Integrated Resource management, Inc. for Approval to Withdraw Escrow Funds*, p. 4 (March 28, 2025) ("*Petition*").

<sup>5</sup> *Order Granting the Petition to Intervene Filed by the Consumer Advocate*, p. 5 (August 25, 2025).

<sup>6</sup> *Amended Notice of Designation of Staff Participating as a Party* (August 12, 2025).

<sup>7</sup> *Amended Petition*, p. 5 (August 19, 2025).

<sup>8</sup> *Letter to Chairman David F. Jones Re Consumer Advocate Intent Not to File Testimony as There Are No Outstanding Issues in this Docket from Karen H. Stachowski, Consumer Advocate* (August 22, 2025).

<sup>9</sup> *Notice of Withdraw of Party Staff, or in the Alternative, Motion of Party Staff to Withdraw from Docket* (August 26, 2025).

<sup>10</sup> *Order Granting Party Staff Motion and Establishing Pre-Hearing Order*, p. 2 (September 10, 2025).

## **II. THE HEARING**

A hearing in this matter was held before the Commissioners during the regularly scheduled Commission Conference on September 15, 2025, as noticed by the Commission on September 5, 2025. Participating in the Hearing were:

Integrated Resource Management, Inc. – Charles B. Welch Jr., Esq., Phelps Dunbar LLP, 414 Union Street, Suite 1105, Nashville, TN 37219, and Jeffrey W. Cox Jr., President, 3444 Saint Andrews Drive, White Pine, Tennessee 37890.

Consumer Advocate – Karen H. Stachowski, Esq., and Clark D. Kaml, Financial Analyst, Office of the Attorney General and Reporter, Post Office Box 20207, Nashville, Tennessee, 37202-0207

During the Hearing, Jeffrey W. Cox Jr., President of IRM, presented testimony on behalf of the Company. Mr. Cox was subject to questions from the Commissioners and Commission Staff. Members of the public were given an opportunity to offer comments, but no comments were submitted.

## **III. STANDARD FOR COMMISSION APPROVAL**

A public wastewater utility must obtain Commission approval for extraordinary expenditures from escrow funds in accordance with Commission Rule 1220-4-13-.07(7), which states:

Reserve/escrow accounts established by a public wastewater utility shall be limited to paying for or reimbursing the utility for extraordinary expenses of the utility or for necessary capital projects, unless otherwise permitted by the Commission. Extraordinary expenses are those resulting from events which are infrequent and unusual in nature, and unrelated to the utilities' routine service or business activities. The utility must first receive authorization from the Commission via approved petition or, in emergency situations, authorization in writing from the Chairman of the Commission upon written request by a representative of the utility to use such funds. The Commission may require public wastewater utility employees having signature authority over such account to obtain a fidelity bond. The public wastewater utility's tariff shall set forth the specific amount charged to customers to fund the reserve/escrow account.<sup>11</sup>

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<sup>11</sup> Tenn. Comp. R. & Regs. 1220-4-13-.07(7).

#### IV. FINDINGS AND CONCLUSIONS

The *Amended Petition* requests reimbursement of \$22,956.43 from the Company's escrow account to recover extraordinary expenses and/or expenses for necessary capital projects incurred during the period of June 2024 to October 2024.<sup>12</sup> The *Amended Petition* includes a summary of the amounts requested in IRM's initial *Petition*, the new amount sought for escrow reimbursement, and reasons for the change.<sup>13</sup>

For June 2024, IRM initially sought \$11,611.33 in reimbursement from its escrow account for five expenditures, including a dosing pump replacement, two control panel replacements, drip tube repairs, sludge pumping, and an emergency pump replacement service call. The *Amended Petition* excluded the expenses related to the drip tube and line repairs at Grand View Subdivision. The amended request for June was therefore reduced to \$9,244.59.<sup>14</sup>

For July 2024, the Company initially requested a reimbursement of \$6,544.74 from its escrow account for five expenditures, including a STEP pump replacement, pump vault upgrades, repair of a lateral line failure, a valve box repair, and drip tube repairs. The valve box and drip tube repairs were excluded in the Company's amended filing, resulting in a revised request of \$4,709.72.<sup>15</sup>

For August 2024, IRM's initial request for reimbursement from its escrow account totaled \$3,496.11 and included repairs to a drip field and replacement of a recirculation panel and dosing pump. The Company's request was amended to exclude the drip field repair, resulting in a total of \$3,048.10 in expenses for August 2024.<sup>16</sup>

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<sup>12</sup> *Amended Petition*, p. 5 (August 19, 2025).

<sup>13</sup> *Id.* at 2-5.

<sup>14</sup> *Id.* at 3.

<sup>15</sup> *Id.* at 3-4.

<sup>16</sup> *Id.* at 4.

For October 2024, IRM initially sought \$7,135.31 in reimbursement for six expenditures, including recirculation panel and pump replacements, tap line repair, storm-related drip field repair, filter replacement, and a lateral PVC pipe repair. IRM's amended request excludes the non-storm-related drip field repair and the filter replacement for a total of \$5,954.02.<sup>17</sup>

Finally, for November 2024, the Company initially sought reimbursement of \$636.69. However, the Company's *Amended Petition* excludes this request in its entirety.<sup>18</sup> The *Amended Petition* does not include \$4,250 for administrative and legal expenses that were sought in the initial *Petition*.<sup>19</sup>

The panel found that the expenditures described in the *Amended Petition* meet the requirements of Commission Rule 1220-4-13-.07(7) and authorized IRM to withdraw funds from the escrow account for reimbursement of these expenditures. Therefore, the panel voted unanimously to approve the *Amended Petition* as filed and to allow IRM to withdraw \$22,956.43 from the Company's escrow account to recover extraordinary expenses and/or expenses for necessary capital projects incurred during the period of June 2024 to October 2024.

**IT IS THEREFORE ORDERED THAT:**

1. The *Amended Petition of Integrated Resource Management, Inc. d/b/a IRM Utility for Approval to Withdraw Escrow Funds* is approved.
2. Any person aggrieved by the Commission's decision in this matter may file a Petition for Reconsideration with the Commission within 15 days from the date of this Order.

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<sup>17</sup> *Id.*; *Petition*, pp. 3-4 (March 28, 2025).

<sup>18</sup> *Amended Petition*, p. 4 (August 19, 2025).

<sup>19</sup> *Id.*; *Petition*, p. 4 (March 28, 2025).

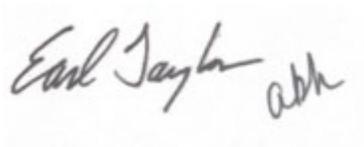
3. Any person aggrieved by the Commission's decision in this matter has the right to judicial review by filing a Petition for Review in the Tennessee Court of Appeals, Middle Section, within 60 days from the date of this Order.

**FOR THE TENNESSEE PUBLIC UTILITY COMMISSION:**

**Chairman David F. Jones,  
Vice Chairman John Hie,  
Commissioner Herbert H. Hilliard,  
Commissioner Robin L. Morrison, and  
Commissioner Kenneth C. Hill concurred.**

None dissented.

**ATTEST:**



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**Earl R. Taylor, Executive Director**