

STATE OF TENNESSEE

Office of the Attorney General



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July 16, 2025

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

Electronically Filed in TPUC Docket
Room on July 16, 2025 at 12:24 p.m.

In Re: *Integrated Resource Management, Inc Request Pursuant to TPUC Rule 1220-04-13-07(7) the Emergency Release of Escrow Funds*, TPUC Docket No. 25-00051.

Dear Chairman Jones:

On July 9, 2025, the Integrated Resource Management, Inc. ("IRM") filed their Petition for Emergency Escrow Funds.

The Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") has reviewed the Petition and supporting documentation filed within this Docket. Following its initial review, the Consumer Advocate spoke informally with IRM. As part of the review, the Consumer Advocate compared the requested recovery with the language set out in Mr. Craig Cox's testimony in TPUC Docket No. 24-00073 (pp. 10-11) about the use of escrow. The Consumer Advocate has completed its review and determined that the requested reimbursements fall within the enumerated activities deemed by Staff as less routine and covered by escrow.

The Consumer Advocate respectfully expresses its intent not to intervene in this proceeding. The Consumer Advocate's opinion or expression of intent may not be used for any purpose other than the expression of intent not to intervene stated herein.

The Consumer Advocate requests that this letter be filed in this Docket.

Sincerely,

A handwritten signature in blue ink that reads "Karen H. Stachowski".

Karen H. Stachowski
Deputy Attorney General

cc: Jeffrey W. Cox, Jr.
Chuck Welch