

TENNESSEE PUBLIC UTILITY COMMISSION



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

October 31, 2025

Docket 25-00072

Jeffrey W. Cox
President, IRM, Inc.
3444 Saint Andrews Drive
White Pine, TN 37890
irmutility@gmail.com

Electronically Filed in TPUC Docket
Room on October 31, 2025 at 1:10 p.m.

sent via email

Re: *Petition of Integrated Resource Management, Inc. to Adopt an Alternative Regulatory Mechanism Pursuant to Tennessee Code Annotated § 65-5-103(d)(7)*

Dear Mr. Cox:

To aid the Commission in its ongoing assessment of this matter, please respond to the following request for information:

- 1.) In your supporting testimony for the above-referenced docket, submitted on September 3, 2025, you indicate that your proposed annual GDP-IPD-based adjustments would only apply to *base* service rates and would not affect escrow, bonding, and rate case charges. Likewise, Exhibit JC-1 ("Proposed ARM Tariff), included with your petition and testimony, states that GDP-IPD-based adjustments would only apply to base rates and "will NOT be applied to escrow rates, bond rates or temporary surcharges or refunds."

Next, refer to tables 3, 4, and 6 in your testimony. These tables reference your previous all-inclusive monthly residential customer charge of \$58.11, which is composed of a base service rate of \$47.98 and escrow charge of \$10.13. During your discussion of these tables, you apply GDP-IPD-based adjustments to the full \$58.11 residential rate. In addition, you make comparisons in your table 6 to your current all-inclusive monthly residential charge of \$74.96, which is composed of your \$64.83 base rate and \$10.13 escrow charge.

Given that your testimony and proposed tariff verbiage appear to be inconsistent with your calculations, please clarify IRM's proposal regarding its annual customer rate adjustments. Clarify whether the Company wishes to apply GDP-IPD-based adjustments to its *base* service rates only or whether it wishes to apply index-based adjustments to its all-inclusive customer charges (or some variation thereof).

- 2.) In your supporting testimony, you reference IRM's customer rate (singular) in several instances. Despite have various customer types and classes, the rate cited in your testimony

is the Company's monthly *residential* rate. Please clarify whether it is your intention to apply an annual index-based adjustment to *all* of IRM's customer classes. If not all of IRM's customer classes, please specify which customer rates are proposed for annual adjustment based on changes in Q3 values of the GDP-IPD.

A response is requested no later than Friday, November 7. In accordance with the Commission's rules, please submit your response electronically to the Docket Manager at tpuc.docketroom@tn.gov with the original and four copies also mailed to the Docket Manager. Should you have questions or need clarification of this request, please contact Craig Cox at craig.cox@tn.gov or (615) 770-0488.

Sincerely,

A handwritten signature in black ink that reads "David N. Foster". The signature is written in a cursive style with a large initial "D".

David Foster, Director
Utilities Division

cc: Docket File
Charles B. Welch, Jr., chuck.welch@phelps.com
Karen H. Stachowski, karen.stachowski@ag.tn.gov