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November 6, 2025

**VIA ELECTRONIC AND U.S. MAIL:**

Electronically Filed in TPUC Docket Room  
on November 6, 2025 at 11:45 a.m.

Mr. David Foster  
Director, Utilities Division  
Tennessee Public Utility Commission  
Andrew Jackson State Office Building  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

**Re: *Integrated Resource Management, Inc.'s Responses to the Commission's Data Requests in TPUC Docket No. 25-00072.***

Dear Mr. Foster,

Enclosed are IRM's responses to the Commission's data requests filed in TPUC Docket 25-00072 on October 31, 2025. A hard copy of this letter and the enclosed responses will be deposited in the U.S. Mail, First Class, postage prepaid. Please contact me if you have any questions concerning this filing or require additional information.

Sincerely,

**PHELPS DUNBAR LLP**



Charles B. Welch, Jr.

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**REQUEST NO. 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).*

**RESPONSE:**

**IRM seeks to apply the GDP-IPD-based adjustments only to its base service rates. IRM does not seek to apply the GDP-IPD-based adjustments to escrow charges, bond rates, access fees, or any charge other than its base rates. The all-inclusive rates of \$58.11 and \$74.96 were used merely as examples to demonstrate how the GDP-IPD-based mechanism functions. The base rates of \$47.98 and \$64.83, rather than the all-inclusive rates of \$58.11 and \$74.96, could have been used in the referenced examples, but the difference in the outcomes, if any, would be miniscule.**

**REQUEST NO. 2:** *In your supporting testimony, you reference IRM’s customer rate (singular) in several instances. Despite having various customer types and classes, the rate cited in your testimony Electronically Filed in TPUC Docket Room on October 31, 2025 at 1:10 p.m. 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.*

**RESPONSE:**

**IRM seeks to apply the GDP-IPD-based adjustments to the base rates of all customer classes, commercial and residential. IRM utilized the residential rate merely as an example to demonstrate how the mechanism functions. IRM apologizes for the confusion with respect to both of the Commission’s data requests.**