

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

Electronically Filed in TPUC Docket
Room on October 22, 2025 at 1:51 p.m.

IN RE:)
)
APPLICATION OF TWO RIVERS, LLC)
FOR A CERTIFICATE OF)
CONVENIENCE AND NECESSITY)

DOCKET NO. 25-00073

**CONSUMER ADVOCATE’S FIRST SET OF DISCOVERY
REQUESTS TO TWO RIVERS, LLC**

This First Set of Discovery Requests is hereby served upon Two Rivers, LLC (“Two Rivers” or the “Company”), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11. The Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Karen H. Stachowski on or before October 30, 2025, at 2:00 p.m. CST.

PRELIMINARY MATTERS AND DEFINITIONS

1. **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.
2. **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3. **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4. **Objections.** If any objections to this discovery are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document, and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5. **Singular/Plural.** The singular shall include the plural, and vice-versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) “You,” “Your,” “Company,” or “Two Rivers” shall mean Two Rivers, LLC and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(b) “Affiliate” shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater clarification, “control” is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board

of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term “Affiliate” shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an “Affiliate”.

(c) “Communication” shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings, and personal conversations, or otherwise.

(d) “Document” shall have the broadest possible meaning under applicable law. “Document” shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made?

(e) “Person” shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(f) “Identify” with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person’s relationship, whether business, commercial, professional, or personal with you;
- ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);

- iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
- iv. Any oral communication means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.

(g) “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.

(h) “Including” shall be construed to mean including but not limited to.

FIRST SET OF DISCOVERY REQUESTS

1-1. Minimum Filing Requirement.¹ Refer to Petition, Appendix A, I.(2)(a)4. The Company stated that Mr. Wimberley and Mr. Chrestman “co-operate TruFlo Service and Consulting LLC.” Confirm that the Company does not have any affiliates.

RESPONSE:

1-2. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(a)9. The Company stated that it would begin construction of the system in September 2025, and that the system’s construction would be completed in two months. Confirm that the Company has not begun construction of the system without the approval of the Commission to own or operate the system and without a contractor licensing² from the Tennessee Department of Commerce and Insurance.

RESPONSE:

¹ The Company has failed to respond to the Consumer Advocate’s letter resulting from its review of the Petition’s compliance with the Commission’s rule on Minimum Filing Requirements. As a result, the Consumer Advocate is now asking for this information in its first discovery request. *Consumer Advocate’s MFR Review Letter*, TPUC Docket No. 25-00073 (October 3, 2025) (“CA MFR Letter”).

² Licensing will be addressed in Consumer Advocate DR No. 1-5.

1-3. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(a)9 and Exhibit 8. The Consumer Advocate found differing dates regarding construction dates between the Appendix (September 2025) and Exhibit 8 (May 2025) of the Company’s filing. Provide clarification of when construction will begin and be completed.

RESPONSE:

1-4. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(b)2. The Company states that TPUC Rule 1220-04-13-.17(2)(b)2 about franchise agreements is inapplicable. Confirm that Fayette County does not require franchise agreements.

RESPONSE:

1-5. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(b)3 and Exhibits 8, 14. The draft permit states that the permittee is Renaissance, LLC. The Company provided a letter from Renaissance, LLC stating it will transfer the deed 11.90 acres to the Company. However, there is no mention of the permit transfer.³ Provide the written agreement that sets out the specifics and timing of the transfer of the permit, as well as the land from Renaissance, LLC to the Company.

RESPONSE:

1-6. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(c)4 and Exhibit 13. Those licenses are for septic tank installation and not a contractor’s license. In the CA MFR Letter, the Consumer Advocate provided an example of the appropriate contractor’s license. The Tennessee Department of Commerce and Insurance provides a document

³ The Draft SOP sets out the requirements for a change in ownership of the system. Further, the Draft SOP sets out the requirements for the “Ownership of the Treatment Facilities.” Petition, Exhibit 14, pp. 6, 10-11.

listing the various classifications of contractor's licenses and exam requirements.⁴ A copy of this document is attached as Exhibit CA DR 1-5. Provide the name of the contractor installing this system and attach a copy of their license.

RESPONSE:

1-7. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(e)5. It appears the Company simply restated TPUC Rule 1220-04-13-.17(e)5. Provide the depreciation rates Two River's intends to use on its books for this system. In your answer, also provide the estimated useful life of each account. If Two River's has not performed a depreciation study then include an explanation of the basis for your rates.

RESPONSE:

1-8. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(e)6 and Exhibits 8, 22. Provide a more detailed breakdown of the cost of construction per phase.

RESPONSE:

1-9. Minimum Filing Requirement. Refer to Petition, Appendix A, Appendix A, I.(2)(e)9. The Company stated that this exhibit would be filed separately at a later date. Provide the information as required by TPUC Rule 1220-04-13-.17(e)5, which directs the Company:

Provide estimates of costs and customers added by month for the first five (5) years based upon the construction build-out schedule for developers in the service area of the proposed wastewater system. For each year, by month, provide an estimated number of customers by customer class anticipated to be served by the wastewater system. Include the utility's basis and assumptions used for this projection. Provide this information in a spreadsheet in Microsoft Excel format with all assumptions clearly documented.

⁴ *Tennessee Board for Licensing Contractor, Classification Outline with Trade Exam Requirements*, <https://www.tn.gov/content/dam/tn/commerce/documents/regboards/contractors/posts/ClassificationOutlineWeb.pdf>

RESPONSE:

- 1-10.** TDEC. Refer to Petition, Exhibit 6, *Direct Testimony of Craig Chrestman* at 1:19 -2:12. Although both located “on site,” the Tennessee Department of Environment and Conservation (“TDEC”) treat Subsurface Sewage Disposal Systems (“SSDS”) separately from onsite wastewater systems which require State Operating Permits (“SOP”) including separate and permitting processes.⁵ It is unclear in Mr. Chrestman’s testimony if he or Mr. Wimberly have experience owning and operating wastewater systems which require SOPs from TDEC rather than septic tank systems. Provide the name and SOP number for the wastewater systems that Mr. Wimberly and Mr. Chrestman have either owned or operated.

RESPONSE:

- 1-11.** Accounting. Refer to the Petition, Appendix A, I.(2)(e)1 and Exhibit 6, *Direct Testimony of Craig Chrestman* at 4:10-14. Respond to the following:
- a. Are TruFlo assets and revenues being pledged as security for the Two Rivers Project?
 - b. Provide annual reports for the last three years of TruFlo.
 - c. What is the current equity balance in TruFlo?

RESPONSE:

- 1-12.** Refer to Petition, Appendix A, I.(2)(e)1 and Exhibit 20. Provide contracts or any other documentation supporting the projection that all 23 lots will have paying customers for all months of the year starting in year 2.

RESPONSE:

⁵ The description and regulatory treatment of SSDS or septic tanks are found at TDEC’s webpage <https://www.tn.gov/environment/permit-permits/water-permits1/septic-systems-permits.html>. The description and regulatory treatment of Water Quality SOPs are found at TDEC’s webpage <https://www.tn.gov/environment/permit-permits/water-permits1/water-quality-state-operation-permit.html>.

1-13. Refer to Petition, Appendix A, I.(2)(e)1 and Exhibit 20. Provide contracts or any other documentation supporting the projection that all 23 lots will have paying customers for all months of the year starting in year 2.

RESPONSE:

1-14. Refer to Petition, Appendix A, I.(2)(e)11 and Exhibit 19. Provide responses to the following:

- a. Explain in detail the value of the performance bond ensures the construction of the wastewater system;
- b. Explain how the performance bond meets the requirement of TPUC Rule 1220-04-13-.17(2)(e)11;
- c. Explain in detail how the amount of the performance bond is equal to or greater than the cost of the system, as provided in contracts;
- d. Explain in detail why the cost to complete the company work is more than the contract price and the bond; and
- e. Reconcile the following:
 - The cost to complete of \$250,000;
 - The contract price of \$162,815;
 - The estimated cost to construct of \$320,000 (Exhibit 8), sewer system of \$317,215, (Exhibit 22); and
 - The total contributed capital of \$400,284.

RESPONSE:

RESPECTFULLY SUBMITTED,

Karen H Stachowski

KAREN H. STACHOWSKI (BPR No. 019607)

Deputy Attorney General

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TPUC Docket No. 25-00073

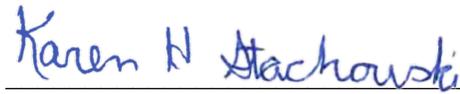
CA's DR 1 to Two Rivers

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail upon:

Melvin J. Malone (BPR No. 013874)
Butler Snow LLP
Neuhoff Building
1320 Adams Street,
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Nashville, TN 37208
(615) 651-6700
Melvin.Malone@butlersnow.com

This the 22nd day of October, 2025.



KAREN H. STACHOWSKI
Deputy Attorney General

Tennessee Board for Licensing Contractors Classification Outline with Trade Exam Requirements

The following is a list of classifications utilized by the Board with the applicable “Trade” exam, if required. The exams are offered by PSI Services, LLC. A “Business and Law” exam is required by all contractor new license applicants. A “trade exam” waiver (reciprocal) agreement exists with several states and more information is available at:

<http://www.tn.gov/content/dam/tn/commerce/documents/regboards/contractors/forms/ContReciprocationWeb2008.pdf>

All contractors are assigned a license “classification” and “monetary limit”. The license status may be confirmed at the “Verify a License” search online at: <http://verify.tn.gov/> This same information, in addition to the name and expiration date, is required to be listed on the outside of the prime contractor’s bid envelope, as well as their subcontractor’s license information (see T.C.A. § 62-6-119).

The classification outline is compiled from T.C.A. § 62-6-112, Rule 0680-01-12 and also Rule 0680-01-16 of Appendix A. These rules are available online at the Secretary of State’s publications: <http://publications.tnsosfiles.com/rules/0680/0680.htm>

License Classification System with Exam Requirements

I. BUILDING CONSTRUCTION

▶ **(BC) - (Exam Required)**

The “BC” classification requires a combined BC exam that covers all areas of contracting listed below for **Residential, Commercial and Industrial** building. The BC classification includes all 34 “Building Categories” (see pages 2-3); and *MU or MU-B (Municipal Utility and Sewer Systems – see page 5)*. A contractor with a full BC or BC-B (**Commercial**) may bid on any project, however, would be required to subcontract work not classified when those portions are \$25,000 or more (see T.C.A. § 62-6-111(d)).

▶ **Residential (BC-A) - (Exam Required)**

Residential building contractors are those whose services are limited to construction, remodeling, repair, or improvement of **one, two, three, or four family unit residences, not exceeding three stories** in height and accessory use structures in connection therewith.

- Combined exams to include Residential are available: BC-A,B; BC-A,b(sm); or BC
- BC-A contractors may bid and perform any of the 34 “Building Categories” for **Residential** projects, only (see pages 2-3)

▶ **Limited Residential (BC-A/r) - (Course from Approved Provider in Lieu of Exam)**

In lieu of passing the residential building trade exam, a contractor may take an approved course from a state community college (see list of providers at [Forms and Downloads Go Section 4](#)). BC-A/r contractors are authorized to bid on and contract for construction, remodel, repair, or improvement of a **single family dwelling**. The monetary limit assigned cannot exceed \$125,000. This is a restricted license as outlined in Rule 0680-01-29., with no 10% bid tolerance; no joint ventures; and must pass exams to increase limit or add classifications.

- BC-A/r contractors may bid and perform any of the 34 “Building Categories” on **single family dwellings**, only (see pages 2-3)

▶ **Commercial (BC-B) - (Exam Required)** (May take a combined exam, such as “BC” or “BC-A,B” or BC-B)

Commercial building contractor is authorized to bid on and contract for the construction, erection, alteration, repair or demolition of any building or structure for use and occupancy by the general public, including residential construction with more than four (4) units or greater than three (3) stories in height. This classification allows performing any of the 34 building subcategories for commercial.

- Combined exams to include Commercial are available: BC-A,B or BC
- BC-B contractors may bid and perform any of the 34 “Building Categories” for **Commercial** (see pages 2-3); also *MU or MU-B (Municipal Utility and Sewer Systems - see page 5)*; and see also T.C.A. § 62-6-111(d) for bidding other non-commercial work.

▶ **Small Commercial (BC-b(sm)) - (Exam Required)**

A small commercial building contractor is authorized to bid on and contract for the construction, erection, alteration, repair or demolition of any building or structure for use and occupancy by the general public, the total cost of which does not exceed \$1,500,000.00. The monetary limit is based upon the financial statement and experience, but is limited to \$1,500,000 (or less) and would require passing the full commercial BC-B trade exam to increase the monetary limit, as well as a new financial statement for a revision request.

- Combined exam to include Small Commercial and Residential: BC-A,b(sm)
- BC-b(sm) contractors may bid and perform any of the 34 “Building Categories” for Commercial (see page 2); see also T.C.A. § 62-6-111(d) for bidding non-commercial work.
- In order to obtain a monetary limit increase more than \$1,500,000, it would require passing the full BC-B commercial trade exam (and providing financial statement for revision)

▶ **Industrial (BC-C) - (Exam Required)**

A contractor under this classification is authorized to bid on and contract for the erection, alteration, repair and demolition of buildings or structures used for industrial production and service, such as manufacturing plants.

- Combined exams are available to include Industrial: BC-B,C or BC
- BC-C contractors may bid and perform any of the 34 “Building Categories” for Industrial (see pages 2-3)

BC - BUILDING CATEGORIES (No Exam Required for up to 5 of 34 Categories)

Each “Building Category” may apply to any major construction classification:

- Residential (BC-A); Commercial (BC-B or BC-(sm)b); or Industrial (BC-C).
 - For example, a BC-A contractor may bid and perform any of the 34 categories below whenever it is a Residential project.
- No trade exam is required for up to five (5) building categories (T.C.A. § 62-6-112).
 - For example, a trade exam is not required to have up to 5 of the 34 classifications, such as: BC-5; BC-7; BC-12; BC-20; and BC-28.
 - *Business and Law exam and experience required*
 - As a “**subcontractor**”, a contractor’s license is not required to perform the type of work classified below, unless it is for **roofing** or **masonry** (as indicated).

The following are classifications for each of the **Building Categories**:

1. Acoustical Treatments (BC-1)
2. Carpentry, Framing and Millwork, etc. (BC-2)
3. Drywall (BC-3)
4. Floor Covering (BC-4)
5. Foundations (BC-5)
6. Glass, Window and Door Construction (BC-6)
7. Institutional and Recreational Equipment (BC-7)
8. Lath, Plaster, Stucco and Aluminum Siding (BC-8)
9. Masonry under \$100,000, materials & labor (BC-9)*
10. Ornamental and Miscellaneous Metal (BC-10)
11. Painting, Interior Decorating (BC-11)
12. Roof Decks (BC-12)
13. Site and Subdivision Development (BC-13)
14. Special Coatings and Waterproofing (BC-14)
15. Tile, Terrazzo and Marble (BC-15)

*BC-9 – Masonry “**prime**” contractors must be licensed for projects \$25,000 or more. Masonry “**subcontractors**” must also be licensed, however, only when the total masonry cost is \$100,000 or more, pursuant T.C.A. § 62-6-102(4)(A)(ii) and (5). Masonry projects, more than \$100,000 require the “LMC” (Licensed Masonry Contractor) trade exam and classification (see page 3).

Continued →

16. Insulation (BC-16)
17. Elevators, Escalators, and Dumbwaiters (BC-17) **
18. Erection and Fabrication of Structural Steel (BC-18)
19. Concrete (BC-19)
20. Sheet Metal (BC-20)
21. Roofing – includes gutters & vinyl siding (BC-21) ***
22. Conveyors (BC-22)
23. Sandblasting (BC-23)
24. Golf Courses (BC-24)
25. Tennis Courts (BC-25)
26. Swimming Pools (BC-26)
27. Outdoor Advertising (BC-27)
28. Excavation (BC-28) ****
29. Landscaping (BC-29)
30. Fencing (BC-30)
31. Demolition (BC-31)
32. Millwright (BC-32)
33. Irrigation (BC-33)
34. Scaffolding (BC-34)

**BC-17 – Elevator contractors must register with the Department of Labor and Workforce Development at: <https://www.tn.gov/workforce/employers/safety>

***BC-21 – Roofing “prime” and “subcontractors” are required to be licensed pursuant T.C.A. § 62-6-102(4)(A)(ii) and (9), when the amount is \$25,000 or more.

***BC-28 – Excavation contractors should check with the Department of Environment and Conservation for NPDES Stormwater Construction permit requirements at: <http://www.tn.gov/environment/permits-permits/water-permits1/npdes-permits/npdes-stormwater-permitting-program.html>

II. MASONRY (LMC) – (Exam Required)

Masonry exam required and license required by both a **prime or subcontractor** performing work in **excess of \$100,000**. As a prime, a **BC-9** non-tested classification (see page 2) is acceptable for projects **\$25,000 to less than \$100,000** (see T.C.A. §§§§ 62-6-102,103,112, and 119).

III. SPECIALTY (S) – (No Exam)

The Board will utilize the system of classifications set forth in Appendix A. The Board reserves the right to depart from the classification system in appropriate individual cases.

If there is not a classification designated in the rules for the type of specialty work performed, a “Specialty” classification may be assigned (pursuant to none of the above licensing classifications cover the scope of work, the Board may assign a “Specialty” classification. A trade exam is not required for specialties; only the Business and Law, as well as experience, and in some cases, certifications.

The following are many of the “Specialty” license classifications utilized by the Board. This is not a complete list of specialty classifications:

- | | |
|---------------------------------|-------------------------------|
| S-Above Ground Tanks | S-Cooling Towers |
| S-Audio Visual Systems | S-Detention Equipment |
| S-Awning & Canopy Installation | S-Erosion Control |
| S-Boring/Directional /Tunneling | S-Equipment Installation |
| S-Building Automation | S-Fiber Optics |
| S-Communication/Cell Towers | S-Furniture/Fixture Install |
| S-Cold Storage Buildings | S-Food Service Equipment |
| | S-Generator Equipment Install |

SPECIALTY (S) (continued)

- S-Granite/Limestone/Monuments
- S-Grain Conveying Systems
- S-Greenhouses
- S-House Moving
- S-Industrial Equipment Install
- S-Laboratory Equipment
- S-Lightning Protection
- S-Leak Detection Systems
- S-Liners
- S-Low Voltage Cabling
- S-Maintenance
- S-Mass Transit Equipment
- S-Medical Gas
- S-Metal Building Installation
- S-Meter Installation
- S-Parking Lot Equipment
- S-Paint Finishing Equipment
- S-Pipeline
- S-Playground Equipment Installation
- S-Poultry Equipment
- S-Pressure Washing
- S-Refinery Maintenance
- S-Refractory
- S-Repair
- S-Right of Way Clearing
- S-Robotic Equipment
- S- Scale Weigh Systems
- S-Sewer & Storm Water Cleaning & Inspection
- S-Shelving & Storage Racks
- S-Solar Panel Installations
- S-Synthetic Turf Installation
- S-Theatre/Stage/Studio Construction
- S-Telecommunications
- S-Toilet Partitions
- S-Tree Trimming
- S-Utility Poles & Inspection
- S-Warehouse Storage
- S-Water Tanks
- S-Water Meter Installation
- S-Well Drilling

IV. HEAVY CONSTRUCTION (HC) – (No Exam)

- A. Marine (wharves, docks, harbor improvements & terminals) **(HC-A)**
- B. Tunnel and Shaft **(HC-B)**
- C. Energy and Power Plants **(HC-C)**
- D. Dams, Dikes, Levees and Canals **(HC-D)**
- E. Mining Surface and Underground **(HC-E)**
- F. Oil Field Construction **(HC-F)**
- G. Oil Refineries **(HC-G)**
- H. Storm Damage Cleanup **(HC-H)**
- I. Landfill Construction **(HC-I)**

► **Heavy Construction Categories (HC) - Apply to All Areas)**

1. Structural Steel Erection **(HC-1)**
2. Tower and Stack Construction **(HC-2)**
3. Foundation Construction, Pile Driving, Foundation Drilling, and Stabilization **(HC-3)**
4. Demolition and Movement of Structures **(HC-4)**
5. Clearing, Grubbing, Snagging and Rip Rap **(HC-5)**
6. Slipform Concrete Structures **(HC-6)**
7. Rigging and Crane Rigging **(HC-7)**
8. Welding **(HC-8)**

Continued →

V. HIGHWAY, RAILROAD AND AIRPORT CONSTRUCTION (HRA) – (No Exam)

Contractors bidding to the Tennessee Department of Transportation (TDOT) may obtain prequalification, bid lettings and other information at: <https://www.tn.gov/tdot/tdot-construction-division.html>

Also check with the Tennessee Department of Environment and Conservation (TDEC) for NPDES (National Pollutant Discharge Elimination System) permit requirements at: <https://tn.gov/environment/permit-permits/water-permits1/npdes-permits1/npdes-stormwater-permitting-program.html>

Highway, Railroad and Airport Construction (HRA) – (No Exam)

A. Grading and Drainage (HRA-A)

Includes grading, drainage pipe and structures, clearing and grubbing.

B. Base and Paving (HRA-B)

1. Base Construction (HRA-B.1)
2. Hot and Cold Mix Asphalt (HRA-B.2)
3. Surface Treatment Asphalt (HRA-B.3)
4. Concrete Paving (HRA-B.4)

C. Bridges and Culverts (HRA-C)

1. Painting (HRA-C.1)
2. Repair (HRA-C.2)
3. Demolition (HRA-C.3)
4. Bridge Deck Overlay (Sealant) (HRA-C.4)
5. Guniting (HRA-C.5)
6. Cofferdam (HRA-C.6)
7. Steel Erection (HRA-C.7)

D. Railroad Construction and Related Items (HRA-D)

E. Miscellaneous and Specialty Items (HRA-E)

1. Traffic Safety (HRA-E.1)
 - (a) Pavement Markers (HRA-E.1(a))
 - (b) Signing (HRA-E.1(b))
 - (c) Guardrail and Fencing (HRA-E.1(c))
 - (d) Attenuators, signalization and roadway lighting (HRA-E.1(d))
2. Landscaping (HRA-E.2)

Includes seeding, sodding, planting, and chemical weed and brush control.
3. Pavement Rehabilitation (HRA-E.3)

Includes pressure grouting, grinding and grooving, concrete joints, and underdrains.
4. Well Drilling (HRA-E.4)*
5. Miscellaneous Concrete (HRA-E.5)

Includes sidewalks, driveways, curb and gutter, and box culverts.

F. Well Drilling also requires a license from the Tennessee Department of Environment and Conservation (TDEC). Their requirements are at: <https://tn.gov/environment/permit-permits/water-permits1/well->. Note: Pursuant T.C.A. 62-6-119, geothermal closed loop contractor's must list the well driller's TDEC license information on the bid envelope.

VI. MUNICIPAL AND UTILITY CONSTRUCTION (MU) – (BC-B Exam Required)

Municipal and Utility Construction includes all supervision, labor, material and equipment to complete underground piping, water and sewer plants and sewer disposal, grading and drainage, and paving (unless restricted to specific areas named). A commercial (BC-B or BC) is considered an acceptable classification to bid and perform any of the work within these categories, including the MU-B.

Continued →

MUNICIPAL AND UTILITY CONSTRUCTION (MU) (Exam Required BC-B or BC for full MU or MU-B)

A. Underground Piping (MU-A) (No Exam)

Furnish supervision, labor, material and equipment to complete all underground piping for municipal and utility construction (unless restricted to specific areas names).

1. Gas Distribution and Transmission Lines (MU-A.1)
2. Sewer Lines, Storm Drains, Rehabilitation and Structures (MU-A.2)
3. Waterlines (MU-A.3)
4. Underground Conduit (MU-A.4)

B. Water and Sewer Systems (MU-B or BC-B or BC) – (BC-B or BC Exam Required)

C. Grading and Drainage (MU-C) * (No Exam)

- Includes grading, drainage pipe and structures, clearing and grubbing.

D. Base and Paving (MU-D) (No Exam)

1. Base Construction (MU-D-1) (No Exam)
2. Hot and Cold Mix Asphalt (MU-D-2) (No Exam)
3. Surface Treatment Asphalt (MU-D-3) (No Exam)
4. Concrete Pavement (MU-D-4) (No Exam)
5. Miscellaneous Concrete (sidewalks, driveways, curb, gutter, box culverts) (MU-D-5) (No Exam)

E. Grading contractors should also check with the Tennessee Department of Environment and Conservation (TDEC) for NPDES (National Pollutant Discharge Elimination System) permit requirements at:

<https://tn.gov/environment/program-areas/apc-air-pollution-control-home.html>

VII. MECHANICAL CONTRACTING (CMC) – (Exam Required)

The classification CMC is noted on licenses issued after 1992 and represents that the licensee has passed the Board licensing exam and that no county or municipality shall require such state licensee or its employees to pass any county or municipal Exam or examination pursuant to TCA § 62-6-111(i)(2)(C).

- ▶ *** Pre-approval is required to take CMC (mechanical) or CMC-A (plumbing) exam at: <http://www.tn.gov/content/dam/tn/commerce/documents/regboards/contractors/forms/ContPlumbingExpApprovalWeb.pdf>**
- ▶ **Prime and Subcontractors performing mechanical work must be licensed as a contractor. In addition, Plumbers, HVAC and Geothermal TDEC Well Drillers must be listed on the bid envelope (see TCA 62-6-119).**
- ▶ **Must also obtain permits from local government for inspections.**

Mechanical Contracting (CMC) – (Exam Required for full CMC)

A. Plumbing and Gas Piping (CMC-A) - (Exam Required) * Exam pre-approval required for CMC-A and CMC

B. Process Piping (CMC-B) – (No Exam)

C. HVAC, Refrigeration and Gas Piping (CMC-C) - (Exam Required)

- ▶ Solar HVAC (Geothermal) – (Exam Required)
Geothermal – Well Drillers refer to Tennessee Department of Environment and Conservation (TDEC) for additional requirements at: [Well Driller Or Installer License](#)

D. Sprinklers & Fire Protection - (CMC-D) - (Exam Required)

- ▶ Must also obtain licenses as a Firm and RME with the Tennessee Division of Fire Prevention. More information at: <http://www.tn.gov/commerce/fire-prevention.html>

E. Insulation of Mechanical Work (CMC-E) – (No Exam)

Continued →

MECHANICAL CONTRACTING (Continued)

- F. Pollution Control **(CMC-F)** – (No Exam)
 - G. Pneumatic Tube Systems **(CMC-G)** – (No Exam)
 - H. Temperature Controls (Pneumatic) **(CMC-H)** - (No Exam)
 - I. Boiler Construction & Repairs **(CMC-I)** - (No Exam)
 - ▶ Also check with the Tennessee Department of Labor and Workforce Development for additional requirements [Boiler Unit](#)
 - J. Fuel Gas Piping and Systems **(CMC-J)** - (No Exam)
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VIII. ELECTRICAL CONTRACTING **(CE)** – (Exam Required)

Electrical contracting classification CE is noted on licenses issued after 1992 and represents that the licensee has passed the Board licensing exam and that no county or municipality shall require such state licensee or its employees to pass any county or municipal test or examination pursuant to TCA 62-6-111(i)(2)(C). (Note: Prior to 1992, the “E” or “E-B” classification was the designation for prior exam.) The CE designation covers all electrical categories (A – L) for residential, commercial and industrial projects:

- ▶ **Prime and Subcontractors must both be licensed as a contractor to perform electrical work. In addition, electrical contractor’s license information must be listed on the outside of the bid envelope (pursuant TCA § 62-6-119)**
- ▶ **Permits are obtained with local government for inspections**

Electrical Contracting **(CE)** – (Exam Required for full CE)

- A. Electrical Transmission Lines **(CE-A,H)** - (Exam Required) - CE-A,H or CE
- B. Electrical Work for Buildings and Structures – **(CE)** (Exam Required)
- C. Underground Electrical Conduit Installation **(CE-C)** – (No Exam)
- D. Sound and Intercom Systems, Fire Detection Systems, Signal and Burglar Alarm Systems, and Security Systems up to (70) volts. **(CE-D)** * – (No Exam) – Please note that a separate license issued by the Tennessee Alarm Systems Contractors Board is also required for **alarm systems**.
- E. Electrical Signs **(CE-E)** – (No Exam)
- F. Telephone Lines and Ducts **(CE-F)** – (No Exam)
- G. Cable T.V. **(CE-G)** – (No Exam)
- H. Substations **(CE-A,H)** – (Exam Required) – CE-A,H or CE
- I. Electrical Temperature Controls **(CE-I)** - (No Exam)
- J. Fire Detection Systems, Signal and Burglar Alarm Systems and Security Systems with conduit and wiring **above (70) volts** require an electrical exam. **(CE-J / CE)** * - (CE Exam Required)

***Alarm Systems Contractors, pursuant T.C.A. § 62-6-135, Alarm System Contractors are not required to obtain the CE-D or CE-J license with the Board for Licensing Contractors, which states in part: “The provisions of this chapter shall not apply to entities certified under chapter 32, part 3, of this title, when such entities are performing functions for which such entities are certified.” In addition, pursuant T.C.A. § 62-32-305(7), exclusion from the Alarm Contractors Licensing Act is available to Electrical (CE), Mechanical (CMC) and HVAC (CMC-C) Contractors licensed under Tenn. Code Ann. § 62-6, who do provide direct sales, monitoring, installation and/or maintenance service of alarm systems, but who **derive less than fifty percent (50%) of their gross annual revenues** from such business. In order to be eligible to file for the exclusion the company must hold a valid Electrical, Mechanical or HVAC contractor’s license, and must file an affidavit of exclusion with the Alarm Systems Contractors Board.**

A separate license or registration for exclusion is needed and more information is available at: <http://www.tn.gov/commerce/regboard/alarm.html>

Continued →

ELECTRICAL CONTRACTING (CE) (Continued)

K. Roadway Lighting, Attenuators and Signalization **(CE-K / CE)** – *(CE Exam Required)*

L. Electric Meter Installation **(CE-L / CE)** *(CE Exam Required)*

Note: The CE classification covers all categories of electrical contracting.

IX. SPECIALTY/ENVIRONMENTAL (S) - (No Exam)

Contractor licenses issued by the Board with the “Specialty/Environmental” license classification do not require a “trade” exam (Business and Law exam, only). However, the contractor must provide their experience, training and certifications with the contractor’s license application.

Refer to the TN Department of Environment and Conservation (TDEC) for accreditation, training, or additional information relating to environmental contracting activities at: <http://www.tn.gov/environment> (For mold remediation training information contact: <https://www.epa.gov/mold>)

A. Asbestos Material Handling/Removing **(S-A)**

- ▶ TDEC information is at: <http://tn.gov/environment/program-areas/asbestos-pro>

B. Underground Storage Tank **(S-B)**

- ▶ TDEC information is at: <http://www.tn.gov/environment/section/underground-storage-tanks>

C. Lead-Based Paint Abatement **(S-C)**

- ▶ TDEC information is at: <http://www.tn.gov/environment/article/lead-hazard-program>

D. Hazardous Waste Removal **(S-D)**

- ▶ TDEC information is at: <http://www.tn.gov/environment/topic/sw-hazardous-waste-management>

E. Air, Water or Soil Remediation **(S-E)**

- ▶ TDEC information is at: <http://www.tn.gov/environment/>

F. Mold Remediation **(S-F)**

- ▶ EPA information <http://www.epa.gov/mold/moldguide.html>

The Board does not have a list of approved training providers, however, you may check with community colleges, technical schools or with the U.S. Department of Labor, Occupational Safety & Health Administration (OSHA) at: <https://www.osha.gov/dte/outreach/>

X. Specialty/Medical Gas Piping (S-Medical Gas Piping) – (No Exam - Certification Required)

- ▶ S-Specialty/Medical Gas Piping installation, maintenance and repair work falling within the regulation of medical gas piping pursuant to T.C.A. § 68-11-253.

A. Medical Gas Piping Installer Certification Requirements.

1. The minimum qualifications for board certification are the qualifications for certification established by the American Medical Gas Institute (AMGI) or the Piping Industry Progress and Education Trust Fund (PIPE).

Continued →

Specialty/Medical Gas Piping (Continued)

A minimum of thirty-two (32) hours of training, with eight (8) of such hours in brazing, shall be required for board certification. The board shall from time to time revise minimum qualifications for board certification to include the most current edition of NFPA 99C "Standard on Gas and Vacuum Systems."

(a) The minimum of thirty-two (32) hours of training for board certification as a medical gas installer shall include training in the following areas from the most current edition of NFPA 99C, Gas and Vacuum Systems:

- (1) Medical Gas Systems.
- (2) Gas Distribution Systems.
- (3) Installation of Pressurized Gas Systems.
- (4) Vacuum Piping.
- (5) Brazing Techniques for Medical Gas Systems.
- (6) Requirements for Levels of Patient Care.

2. The board may designate and approve independent examining agencies, as necessary, to provide the training and examinations necessary for board certification required by T.C.A. § 68-11-253.

EXAMINATIONS

The Examination vendor for Tennessee is PSI. You may review their Exam information, for registration and study materials offered, from our website or at the following links:

Website of PSI (Online Registration)

<https://candidate.psiexams.com/index.jsp>

"Candidate Information Bulletin" of PSI's Exam Information [pdf]

https://candidate.psiexams.com/bulletin/display_bulletin.jsp?ro=yes&actionname=83&bulletinid=200&bulletinurl=.pdf

All candidates obtaining a new "Contractor" license are required to take the "*Business and Law*" exam. The exam is open book and based upon the reference manual, "*Contractor's Guide to Business, Law and Project Management*" the Tennessee edition, published by NASCLA. Information on ordering the book is available on both of the above referenced websites. The contractor applicant may have an owner or a full time employee act as the Qualifying Agent to take the exam. The license is issued to the entity supplying the financial statement.

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