

November 7, 2025

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket Room
on November 7, 2025 at 4:24 p.m.

RE: *Application of Two Rivers Utility, LLC for a Certificate of Public Convenience and Necessity, TPUC Docket No. 25-00073*

Dear Chairman Jones:

Attached for filing please find *Two Rivers Utility, LLC's Supplemental Response to Consumer Advocate's First Set of Discovery Requests* as well as the *Verification* for the Responses previously filed on November 4, 2025, in the above-captioned matter

Please note that **Confidential Attachment 1.11.b.** to the Supplemental Response is being submitted **UNDER SEAL** as **CONFIDENTIAL AND PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of **Confidential Attachment 1.11.b.** are attached.

As required, copies will follow. Should you have any questions concerning this filing or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP


Melvin J. Malone

clw

Attachments

cc: Craig Chrestman, Two Rivers Utility
Joey Wimberley, Two Rivers Utility
Karen H. Stachowski, Esq., Consumer Advocate

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:)	
)	
APPLICATION OF TWO RIVERS UTILITY, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY)))))	DOCKET NO. 25-00073

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

Two Rivers Utility, LLC (“Two Rivers”), by and through counsel, hereby submits its Supplemental Response to First Set of Discovery Requests propounded by the Consumer Advocate Division of the Attorney General’s Office (“Consumer Advocate”).

GENERAL OBJECTIONS

1. Two Rivers objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.
2. Two Rivers objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission (“TPUC” or “Authority”).
3. The specific responses set forth below are based on information now available to Two Rivers, and Two Rivers reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. Two Rivers objects to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. Two Rivers objects to each request to the extent it seeks information outside Two Rivers' custody or control.

6. Two Rivers' decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of Two Rivers' General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. Two Rivers objects to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.

8. Two Rivers objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. Two Rivers does not waive any previously submitted objections to the Consumer Advocate's discovery requests.

SUPPLEMENTAL RESPONSES

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 licensing from the Tennessee Department of Commerce and Insurance.

RESPONSE: Please see Two Rivers' October 23, 2025, Responses to CAD's October 3, 2025, letter.

Supplemental Request: Please state clearly whether construction of the system has begun.

- a. If construction has begun, what date did construction start and a status on the construction.
- b. If construction has not yet started, provide a new estimate of the date construction will begin since the date of "September 2025" has passed.

SUPPLEMENTAL RESPONSE: Construction has not yet begun.

- a. Not applicable.
- b. Construction is estimated to begin as soon as feasible after Two Rivers' request for a CCN from the Commission is approved.

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:

- b. Provide annual reports for the last three years of TruFlo.

SUPPLEMENTAL RESPONSE:

- b. TruFlo's tax returns for the last three years are attached hereto as **Confidential Attachment 1.11.b** which his being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**.

Respectfully submitted,



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*Attorneys for Applicant Two Rivers Utility,
LLC*

PUBLIC VERSION

DR 1-11.b. – TRUFLO TAX RETURNS

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

IN RE:

APPLICATION OF TWO RIVERS
UTILITY, LLC FOR A CERTIFICATE
OF PUBLIC CONVENIENCE AND
NECESSITY

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DOCKET NO. 25-00073

VERIFICATION

STATE OF Tennessee)

COUNTY OF McNairy)

I, CRAIG CHRESTMAN, being duly sworn, state that I am authorized to testify on behalf of Two Rivers Utility, LLC in the above-referenced docket, that if present before the Commission and duly sworn, verifies that the data requests and discovery responses are accurate to the best of my knowledge.

Craig A. Chrestman
CRAIG CHRESTMAN

Sworn to and subscribed before me
this 5th day of Nov, 2025.

Jaime N Wilkerson
Notary Public

My Commission expires: 3-18-2029



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Karen H. Stachowski, Esq.
Deputy Attorney General
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Consumer Advocate Division
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This the 7th day of November 2025.



Melvin Malone