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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

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 Discovery Request No. 1-8*, in the above-captioned matter

Please note that **Confidential Exhibit 30** to the Supplemental Response is being submitted **UNDER SEAL** as **CONFIDENTIAL AND PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of **Confidential Exhibit 30** 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

Attachment

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

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**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 DISCOVERY REQUEST NO. 1-8**

Two Rivers Utility, LLC (“Two Rivers”), by and through counsel, hereby submits its Supplemental Response to Discovery Request No. 1-8 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 RESPONSE

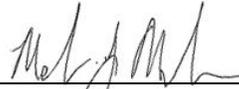
1-8. Minimum Filing Requirement. Refer to Petition, Appendix A, I.(2)(e)6 and Exhibits 8, 22.

Provide a more detailed breakdown of the cost of construction per phase.

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

SUPPLEMENTAL RESPONSE: Please also see the December 20, 2024, agreement between Renaissance Developments, LLC and Crown Construction & Development, LLC, which is attached hereto as **CONFIDENTIAL Exhibit 30** to the Application and is being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**.

Respectfully submitted,



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*Attorneys for Applicant Two Rivers Utility,
LLC*

PUBLIC

EXHIBIT 30

**Confidential Agreement
Between Owner and Contractor**

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

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 Chrestman

CRAIG CHRESTMAN

Sworn to and subscribed before me
this 23 day of Dec, 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 26th day of December 2025.



Melvin Malone