

January 16, 2026

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VIA ELECTRONIC FILING

Michelle Mairs, Deputy Director
Utilities Division
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
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RE: *Application of Two Rivers Utility, LLC for a Certificate of Public Convenience and Necessity, TPUC Docket No. 25-00073*

Dear Ms. Mairs:

We are in receipt of your data requests to Two Rivers Utility, LLC (“Two Rivers”), dated January 8, 2026. Please find Two River’s responses below.

1. *Commission Staff has reviewed the Petitioner’s Exhibit 20 Pro-Formas that were filed on September 4th, as well as the Supplemental Exhibit 24 filed on September 18th. Staff has observed on both financial models, the full \$60 billing charge per customer is being treated as revenue.*

Per the Petitioner’s proposed tariff (Exhibit 16), only \$49.49 of each customer bill should be treated as revenue, with \$10.86 being treated as liability escrow collections. Escrow collections are not treated as revenues but rather deposited into a separate account (refer to Commission Rule 1220-04-13-.07(6) – (8)). Provide revised financial projections where only the revenues from rates are included in the income statement projection in accordance with Commission Rule 1220-04-13-.17(2)(e)(2).

Response: Please see attached **Confidential Revised Supplemental Exhibit 24**, which is being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**.

2. *Commission Staff has reviewed the Petitioner’s Exhibits 20 and 24. Neither of these financial projections anticipate employee labor expenses.*
 - a) *Explain how Two Rivers Utility, LLC intends to perform its administrative and day-to-day operational functions without the use of employees?*

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- b) *If non-employee labor will be used to fulfill these functions, elaborate on how the services will be provided?*

Response: The administrative duties will be handled by Craig Chrestman, Joey Wimberley, and Randy Crawford, along with the outside accountant for Two Rivers. Craig Chrestman, Joey Wimberley, and Randy Crawford will handle regular visual site inspections. Regular and periodic sampling will be performed by Rand Crawford. On call emergency services will be handled among Craig Chrestman, Joey Wimberley, and Randy Crawford on an alternating basis.

3. *Please file an updated proposed tariff (Petitioner's Exhibit 16) that includes the proposed rates to be charged, as well as the proposed rules, terms, conditions of service, and any required customer subscription agreements.*

Response: We will respond to this Data Request No. 3 via a supplemental response as soon as possible.

4. *Currently, it appears the TDEC SOP is in the name of the Developer. The SOP needs to be in the name of Two Rivers Utility, LLC, prior to the Petitioner commencing operations to serve Canterbury Manor. Provide a written and signed agreement between the Developer and the Petitioner expressing the intention to transfer the SOP.*

Response: Please see the attached agreement between the Developer and Two Rivers, attached hereto as **Confidential Exhibit 31**, which is being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**.

5. *Provide a written and signed agreement between the Developer of this project and Two Rivers Utility, LLC, expressing:*

a) *The terms, conditions, and all rights retained, assigned, or transferred between the Developer and Utility.*

b) *An overview of the various property/assets (both tangible and intangible) to be granted to the Utility by the Developer.*

c) *The agreement provided needs to be signed by authorized personnel of both parties.*

Response: Please see the attached agreement between the Developer and Two Rivers, attached hereto as **Confidential Exhibit 31**, which is being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**.

6. *Are wastewater services currently being provided for Phase I, Phase II, or any current residents of Canterbury Manor? If so:*

a) *What entity owns and operates the wastewater system?*

b) *Please describe the services being provided.*

c) *Please explain the legal basis for exemption of regulation by this Commission.*

Response: Phases 1 and 2 are on individual septic systems and not decentralized.

7. *In its November 4, 2025, response to the Consumer Advocate's Data Request 1-14, the Petitioner stated that the Developer has already installed the "other components" of the wastewater collection system.*

a) *Please identify the "other components" of the wastewater system that have already been constructed. Specifically address whether the collection and treatment components of the system have been completed.*

b) *What entity currently owns and operates the aforementioned system components?*

c) *State whether the remaining construction work to be performed on the wastewater system to serve Phase III is only the disposal system, which the Petitioner has stated to be a cost of \$162,815. If not, please specifically identify all components of the wastewater system that need to be constructed to complete the wastewater system, along with cost estimates for those components.*

Response:

a) All of the (other components) referred to is the sewer line and collection system from each lot that has already been installed by the developer down to the disposal area. It has been stubbed out awaiting the installation of the tanks and disposal field, which is the cost of \$162,815.00. The treatment components of the system have not been completed.

b) The Developer owns the already installed sewer line and collection system but will transfer ownership to Two Rivers upon approval of the CCN application before the Commission.

c) Yes, the only remaining construction work to be performed on the wastewater system is the disposal system (i.e. the tanks, pumps, and disposal field).

8. *Please state the amount of estimated Contributions in Aid of Construction (CIAC), by each system component, that will be booked by the Utility upon conveyance of the system to the Utility.*

Response: The total CIAC is estimated to be \$400,284.00.

Land value - \$83,069.00 property to be deeded to Two Rivers.

Sewer system- \$154,400.00 already installed by the Developer to be deeded to Two Rivers.

Disposal system- \$162,815.00 Tanks and dispersal Low Pressure Lines.

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Please feel free to reach out to me if you have any further questions.

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

PUBLIC VERSION

REVISED SUPPLEMENTAL EXHIBIT 24

**Estimates of Costs and Customers
for First Five Years**

PUBLIC

EXHIBIT 31

**Confidential Agreement
Between Developer and Two Rivers**

