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December 1, 2025

VIA ELECTRONIC AND U.S. MAIL:

Electronically Filed in TPUC Docket Room
on December 1, 2025 at 4:18 p.m.

Mr. Vance Broemel, Esq.
Office of the Tennessee Attorney General
Consumer Advocate Division
PO Box 20207
Nashville, TN 37202
Vance.Broemel@ag.tn.gov

Re: *Integrated Resource Management, Inc.'s responses to the Consumer Advocate Division's second set of inquiries regarding compliance with minimum filing requirements in TPUC Docket No. 25-00075.*

Dear Mr. Broemel:

Please find enclosed Integrated Resource Management, Inc.'s responses to the Consumer Advocate Division's second set of inquiries regarding IRM's compliance with the minimum filing requirements in TPUC Docket No. 25-00075.

A copy of this letter will be sent via U.S. Mail. As required, the original and four copies of this letter will also be sent via U.S. Mail to the TPUC Docket Manager for filing. Please contact me if you have any questions concerning this filing or require additional information.

Respectfully,

PHELPS DUNBAR LLP



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Rule 1220-04-13-.17(2)(b) Property Rights – Public Need

1. ***Rule 1220-04-13-.17(2)(b)3.*** All contracts or agreements between the builder(s) of the treatment and/or collection system, the utility, and the property and/or subdivision developer that show entitlement or ownership to the land, system specifications, costs for the wastewater system, timeline for the system to be built, and rights to the system once it is completed. Documents presented by the applicant should be signed by all parties and bear marks or stamps, such as those provided by notaries or public officials, as necessary. After reviewing the Company's Response to the Consumer Advocate's MFR Letter and the Amended Petition, the Consumer Advocate found Exhibit 2 (Utility Service Agreement between IRM and Thunder Air) but no contract between C&D Recycling and Thunder Air. Since it is the developer covering the construction cost of the development, please file this contract/agreement between C&D Recycling and Thunder Air in the Docket.

APPLICANT'S RESPONSE: Objection. IRM objects to this request as vague and unduly burdensome. IRM does not know to which contract the phrase "this contract/agreement between C&D Recycling and Thunder Air" refers, as "this contract/agreement" lacks clear meaning. Moreover, IRM is not affiliated with Thunder or C&D and has no authority over them, their contracts, or any privileged and/or confidential information contained therein. IRM understands that Thunder and C&D are finalizing a contract under which C&D will serve as the prime contractor for the development. However, no such contract is in IRM's possession. IRM avers that it has complied with Rule 1220-04-13-.17(2)(b)3.

Rule 1220-04-13-.17(2)(c) Managerial Ability

1. ***Rule 1220-04-13-.17(2)(c)4.*** Proof that the party contracted to install the proposed system has a valid and current contractor's license by the applicable licensing board of the State of Tennessee. After reviewing the Company's Response to the Consumer Advocate's MFR Letter and the Amended Petition, the Consumer Advocate found Exhibit 18 (License for JHH, LLC) to be expired and that the license is not the appropriate one for constructing utility wastewater systems, which is identified as "MU-A"; "MU-B"; or BC-B" or "BC." Attached is a copy of the contractor classification provided by the Tennessee Department of Commerce and Insurance.

Does JHH, LLC plan to hire a subcontractor with the appropriate contractor licensing for constructing a wastewater system? If so, please identify the subcontractor, provide a copy of the subcontractor's license, and a copy of the contract/agreement with the subcontractor. If JHH, LLC plans to construct the wastewater system itself, provide a copy of JHH, LLC's contractor license appropriate for constructing a wastewater system.

In the Amended Petition, Exhibit 20, the Company provides a detailed cost breakdown. A copy of this breakdown is provided below.



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Phase 1				
River Gorge Ranch - Wastewater Costs	Thunder Air Inc.	River Gorge Ranch - Wastewater Costs	IRM C&C Co.	
Headwork Materials - Collection, Force Mains, Man Holes, Tankage Etc.	\$ 326,759.41	Dough Main Plant & Lift Station Materials, Pumps, Motors, Electrical Materials, Etc.	\$ 115,000.00	
Generator	\$ 56,000.00	Labor Installation Dosing & Lift Station	\$ 45,000.00	
Gravel/Soil	\$ 50,000.00	LIFT Piping, Valves/Boxes, Fittings, Distribution Valves, Misc Materials	\$ 335,000.00	
Labor/Cranes/Machines	\$ 40,278.00	Labor LPIs Layout Bells, Main Lines, Distribution Lines, Misc State Inspection	\$ 4,30,000.00	Combined Totals
Subtotal	\$ 482,637.41	Machinery/Operators	\$ 945,000.00	
20% Contingency	\$ 96,527.48	Subtotal	\$ 1,427,000.00	
Total	\$ 579,164.89	20% Contingency	\$ 180,000.00	
		Total	\$ 1,334,000.00	\$ 1,712,664.89

Phase 2			
River Gorge Ranch - Wastewater Costs	Thunder Air Inc.	River Gorge Ranch - Wastewater Costs	IRM C&C Co.

The Petition states that Thunder Air will be covering the cost of the construction, so please explain the breakdown of costs between Thunder Air and IRM C&C. Also, C&D Recycling, LLC is identified as the contractor, not IRM C&C, so please explain the inclusion of IRM C&C on the cost breakdown.

APPLICANT’S RESPONSE: **Objection.** IRM objects to this request to the extent it addresses matters beyond the authority of TPUC. Determinations regarding the type of contractor’s license required for a particular type of work fall within the purview of the Tennessee Board for Licensing Contractors, not TPUC. Rule 1220-04-13-17(2)(c)4 requires only proof of a “valid and current contractor’s license.” The prime contractor for this project is C&D Recycling. JHH, LLC is no longer involved in this project. C&D holds a valid and current “BC” contractor’s license, a copy of which was filed in this docket on November 7, 2025. Accordingly, Rule 1220-04-13-.17(2)(c)4 has been satisfied.

Objection. IRM further objects to the request regarding Exhibit 20 as irrelevant. Rule 1220-04-13-.17(2)(c)4 has already been satisfied. Exhibit 20 was included solely to demonstrate the cost of the system. IRM C&C is merely a subcontractor.

Rule 1220-04-13-.17(2)(c) Financial Capability

1. *Rule 1220-04-13-.17(2)(e)2.* The rule asks for pro forma income statements for the wastewater utility for the first three (3) years of operations or for an expanded amended CNN, the first three years after the latest year-end financials. In the calculations of utility revenues show the number of consumers and the rates used in the calculations. Show operation and maintenance expenses by account number and provide the basis and/or assumptions used to arrive at these amounts. After reviewing the Company’s Response to the Consumer Advocate’s MFR Letter and the Amended

Petition, the Consumer Advocate still does not find the required information. Please file a document that includes the rates, O&M expenses by account number, and basis and/or assumptions used to arrive at said totals in this Docket. (Exhibit 6 is a water flow estimate with assumptions of persons and use per person. It does not specify the time period or contain rates (prices). Assumptions for costs and revenues are not provided. If incorporated by reference, the reference should be provided. (The actual values should still be included in the petition.)

APPLICANT'S RESPONSE: Objection. IRM objects to this request as irrelevant and duplicative. This request seeks information that either has already been provided or cannot be provided at this time. IRM's system does not assign account numbers until accounts are opened. Because no accounts have been opened, no account numbers exist to be produced. Usage assumptions and rates have been provided. Please see Exhibit 6 (wastewater flow table) and Exhibit 17 (most recent tariff) to IRM's Amended Petition.

- 2. Rule 1220-04-13-.17(2)(e)9.* This rule requires 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. After reviewing the Company's Response to the Consumer Advocate's MFR Letter and the Amended Petition, the Consumer Advocate still does not find the required information. The response provided is an explanation. Exhibit 8 is projected income by year. It is still missing customer estimates, and projections and financial information by month. There is no support for the revenue or revenue growth. File corrected exhibits to satisfy this rule in the Docket.**

APPLICANT'S RESPONSE: Objection. IRM objects to this request as irrelevant and duplicative. This request seeks information that either has already been provided or cannot be provided at this time. Furthermore, the directive to "file corrected exhibits" is vague and lacks clear meaning. Phase 1 of Amenity 1 includes only the restaurant. Presently, there are no definitive projections or estimates beyond what has been submitted. For use assumptions and rates, please see Exhibit 6 (wastewater flow table) and Exhibit 17 (most recent tariff) to IRM's Amended Petition.