

July 7, 2026

Electronically Filed in TPUC Docket Room on July 7, 2026 at 1:11 p.m.

Honorable David Jones, Chairman
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Re: **Edge Wastewater Utilities, LLC.**
Supplemental Information to Certificate of Convenience and Necessity No. 26-00017

Dear Chairman Jones,

On March 2, 2026, Edge Wastewater Utilities, LLC. ("Petitioner") filed a request for a New Certificate of Convenience and Necessity for a project in Maury County, Tennessee, hereinafter referred to as the "Baker Farms Project" (the "Petition"). TPUC issued the Petition the docket number 26-00017. In accordance with a Request for Additional Information from Michelle Mairs, Audit and Compliance Director, dated June 26, 2026, Petitioner tenders the following information to clarify certain aspects of the Petition.

REQUEST: Section 3 – List of Members & Officers of the Wastewater Utility
Are both Edge Wastewater, LLC and Edge Wastewater Utilities, LLC owned and managed by the same four members?

RESPONSE: Yes, Petitioner and Edge Wastewater LLC are owned and managed by:

- Richard Matthew Nicks, President / Managing Member
- Matthew A. Taylor, Treasurer
- James F. Reed, III, Member
- Trevor W. Acree, Member

REQUEST: Section 12 – Letters from Local Governments and Utilities

Provide confirmation from the Spring Hill, TN Department of Public Works/Spring Hill Government as to whether they have the intent or ability to provide sewer/wastewater service to customers of the Baker Farms Subdivision. If a moratorium for new sewer connections is active for Spring Hill, please provide documentation reflective of that circumstance.

RESPONSE: Attached is Exhibit 12 - Letter dated June 30, 2026 from the City of Spring Hill Water Department confirming that the City does not service the property and does not intend to service the property in the future.

REQUEST: Section 18 – Treatment System Contractor & Construction Agreement

Per Commission Rule 1220-04-13-.17(2)(c)(4), petitions for a CCN must include proof that the contractor selected to install the proposed system holds a valid and current contractor's license with an adequate monetary limit. Edge Wastewater, LLC's current monetary limit is \$400,000, while the awarded contract totals \$1,654,510. Therefore, the contractor's license submitted with the Petition does not comply with Commission Rule 1220-04-13-.17(2)(c)(4). Accordingly, please explain how the Petitioner and Developer intend to remedy this non compliance with Commission Rules. In response to this matter, the Petitioner must provide sufficient documentation to demonstrate compliance with Commission Rule 1220-04-13 .17d(2)(c)(4).

RESPONSE: Edge Wastewater, LLC. will subcontract the construction of the treatment facility and installation of the land application areas to:

A&R Excavating LLC.
License Number 75790
Classifications MU-A, MU-C, MU-D

Attached is Exhibit 18 – Contractors License for A&R Excavating LLC., showing a monetary limit of three million dollars (\$3,000,000).

REQUEST: Section 19 – SOP Application/Permit

Please file the following documents from the Tennessee Department of Environment and Conservation:

- a) notice of a complete application;
- b) Draft SOP Permit

RESPONSE: Attached is Exhibit 19 - copy of the Notice of Complete Application and Public Notice Requirements dated April 16, 2026 and a copy of the Draft State Operating Permit No. SOP-25037 dated April 22, 2026.

Currently, it appears TDEC State Operating Permit ("SOP") is in the name of Edge Wastewater, LLC. Per Commission Rule 1220-04-13-.17(2)(d)(1), the CCN Petitioner needs to be the entity holding the SOP. Does the Petitioner intend to send TDEC a written request to change the entity being permitted to Edge Wastewater Utilities, LLC before final permit issuance? The SOP should be in the name of Edge Wastewater Utilities, LLC, similar to SOP-26007 shown on TDEC's data viewer.

RESPONSE: Petitioner submitted a revised State Operating Permit Application to TDEC to amend the name on the SOP. Please also see a responsive email correspondence between Petitioner and TDEC, attached as Exhibit 19, wherein TDEC responds to Petitioner's request advising that the name change will be made on the Final Permit.

REQUEST: Section 25 – NARUC Chart of Accounts

Per Commission Rule 1220-04-13-.17(2)(e)(3), petitions for a CCN must include a proposed chart of accounts for the wastewater utility, following the NARUC Uniform System of Accounts (USA) for wastewater utilities.

RESPONSE: Attached is Exhibit 25 - the NARUC proposed chart of accounts that conforms with the NARUC Uniform System of Accounts for wastewater utilities.

REQUEST: Section 26 – Plant in Service Account Numbers

Per Commission Rule 1220-04-13-.17(2)(e)(4), petitions for a CCN must include a list of all plant-in-service account numbers with account names and estimated account balances as of the state of operations. The Petitioner must break down the various plant to be contributed to the Utility upon commencement of operations into the corresponding USOA account numbers.

RESPONSE: Attached is Exhibit 26 - a listing of plant-in-service account numbers.

REQUEST: Section 27 – Depreciation rates/schedule

Per Commission Rule 1220-04-13-.17(2)(e)(5), petitions for a CCN must include a list of depreciation rates the applicant intends to use for each plant account that will be on the wastewater utility's books inclusive of an estimated useful life for each account (asset type). If there is a type of plant to be contributed that is not reflected on page 4 of the Petition, please amend the depreciation list.

RESPONSE: Petitioner will utilize the following straight-line depreciation method under the Generally Accepted Accounting Principles:

Buildings	20-50 years
Building Improvements	10-20 years
Computers & Software	3-5 years

EDGE WASTEWATER

Office Furniture	5-10 years
Machinery & Equipment	7-15 years
Vehicles	3-8 years
Leasehold Improvements	Shorter of lease term or useful life

REQUEST: Section 35 – Financial Security

Please provide a financial security instrument in compliance with Commission Rule 1220-04 13-.07 (Financial Security Rule). The Letter of Credit or Surety Bond instrument must be in a form compliant with Commission Rule 1220-04-13-.08 (Standard Forms for Filing Financial Security).

RESPONSE: Attached is Exhibit 35 - Letter of Credit from FirstBank for the stipulated amount of \$20,000.00

REQUEST: Commission Staff requests clarification of the business model to be employed by the Petitioner, please provide responses to the following questions:

- a) Will Edge Wastewater, LLC provide maintenance, repair, and customer service for utility customers of Edge Wastewater Utility, LLC? Please elaborate on what services may be provided by Edge Wastewater, LLC to the Petitioning entity.

RESPONSE: Edge Wastewater, LLC will provide operational maintenance & repair services to Petitioner. These services will be provided in accordance with the affiliated entity guidelines. Edge Wastewater, LLC, will also provide customer service to Petitioner as further described below.

- b) Further, please explain how Edge Wastewater Utilities, LLC will accomplish the provision of operational and administrative services. For example, will the Petitioner hire employees, outsource the work, or use the time and labor of its four members to accomplish organizational objectives? In your response, please provide an explanation for how Edge Wastewater Utilities, LLC will provide each of the following essential customer services/reporting requirements:

- Customer billing
- Customer service inquiries
- Maintenance/operating emergencies
- General maintenance and repairs
- Regulatory reporting
- Accounting

RESPONSE: Petitioner will discharge its operational and administrative duties through Edge Wastewater, LLC. Edge Wastewater, LLC, will utilize a

410 New Salem Highway, Suite 107
615/969-6564

Murfreesboro, Tennessee 37129

EDGE WASTEWATER

combination of employees and technology solutions. Edge Wastewater, LLC, has retained a dedicated customer service representative with extensive experience supporting clients of wastewater utility services. In addition, Edge Wastewater, LLC, is in the final stages of selecting a highly secure, industry recognized web-based software solution that will support centralized customer support functions including account creation, move-ins, move-outs, service transfers, and billing. This system will provide the ability to organize, access and track customer account information and requests and is designed to make information easily catalogued and easily retrieved for regulatory reporting purposes.

The system selected will also contain functionality that provides field operators with real-time access to view and respond to service tickets. Operators will benefit from the software's ability to optimize scheduling, routing and track inventory, potentially resulting in increased operational responsiveness, efficiency and customer satisfaction.

Edge Wastewater has also retained a controller with extensive wastewater utility accounting experience.

Thank you for your consideration.

Sincerely,
Edge Wastewater Utilities, LLC.

A handwritten signature in blue ink, appearing to read "R. Matthew Nicks", with a long horizontal flourish extending to the right.

R. Matthew Nicks,
President

Attachments

Exhibit 12

Letters from Local Government and Utilities

City of Spring Hill Letter

SPRING HILL
T E N N E S S E E

June 30, 2026

Dear Paul Varney,

The City of Spring Hill does not currently provide public sanitary sewer service to the property located at **1603 Carters Creek Pike, Columbia, Tennessee (Baker Farms)**.

Additionally, the City of Spring Hill does not anticipate providing sanitary sewer service to this property as part of any future service area expansion or growth plans. Accordingly, the City is not expected to be the future sanitary sewer service provider for this property.

Please let me know if you need any additional information.

Sincerely,



Ryan LaMunyon
Assistant General Manager – Reclamation
City of Spring Hill
199 Town Center Parkway
Spring Hill, TN 37174
931-451-0241
rlamunyon@springhilltn.org



City of Spring Hill | Water Department
199 Town Center Parkway
Spring Hill, Tennessee 37174
rlamunyon@springhilltn.org
931-451-0241

Exhibit 18

Treatment System Contractor & Construction Agreement

Contractors License for A&R Excavating LLC

State of Tennessee

14317119

BOARD FOR LICENSING CONTRACTORS
CONTRACTOR
A&R EXCAVATING LLC

This is to certify that all requirements of the State of Tennessee have been met.

ID NUMBER: 75790
LIC STATUS: ACTIVE
EXPIRATION DATE: January 31, 2027
\$3,000,000.00; MU-A; MU-C; MU-D



IN-1313
DEPARTMENT OF
COMMERCE AND INSURANCE

Exhibit 19

State Operating Permit Application

Notice of Complete Application

&

Draft of State Operating Permit

&

eMail String with TDEC Concerning the Name
Change on the Permit



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

Davy Crocket Tower
500 James Roberson Pkwy, 9th Floor
Nashville, Tennessee 37243-1102

April 16, 2026

Mr. Matt Nicks
President
Edge Wastewater, LLC
e-copy: mnicks@edgwastewater.com
410 New Salem Highway
Suite 100
Murfreesboro, TN 37129

Subject: **Notice of Complete Application and Public Notice Requirements**
Permit No. SOP-25037
Edge Wastewater, LLC
Baker Farms Treatment Facility
Columbia, Maury County, Tennessee

Matt Nicks:

The Division of Water Resources (the division) acknowledges receipt of a permit application in our office on January 12, 2026. Our review of the SOP permit application showed that you have submitted all the information required to initiate processing of the application. You are advised that this notice of complete application does not imply that the application will be approved or that a permit will be issued. Also, in accordance with rules of the Tennessee Department of Environment and Conservation, Division of Water Resources, Chapter 0400-40-5-.05 (2):

"This provision does not preclude the commissioner from later requesting additional material that subsequent to the notice of completeness is determined to be necessary for permit processing."

Since this is an application to renew an existing permit and your complete application was mailed to our office 180 days prior to the current permit expiration date, and the permit is not reissued by this date, discharges from the facility will be automatically authorized through administrative extension of the current permit.

If this is an application for a new or expanded discharge, please find attached a template of a public notice you must complete and post for a period of 30 days. This is required in accordance with Chapter 0400-40-5-.06 (1), which states:

"For an individual application for a new or expanded discharge, the applicant shall notify the public of the application by posting a sign near the point of entrance to such facility and within view of a public road. The sign shall contain provisions as specified by the commissioner. The sign shall be of such size that is legible from the public road. Also the sign shall be maintained for at least thirty days following submittal of the application to the division."

If you have questions, please contact the Columbia Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Bryan Pope at (931) 224-3098 or by E-mail at Bryan.pope@tn.gov.

Sincerely,



Bryan Pope
Consultant, Land-Based Systems

Enclosure

cc: Permit File
Columbia Environmental Field Office
Cole McCormick, Tennessee Public Utility Commission (TPUC), cole.mccormick@tn.gov

PUBLIC NOTICE

OF APPLICATION FOR PERMIT TO DISCHARGE/DISPOSE OF WASTEWATER

Applicant Name	Edge Wastewater, LLC
Project Name	Baker Farms Treatment Facility
Permit Number	SOP-25037
Date this Notice was Posted	
Number of days this Notice should be Posted	30
Wastewater Source, Treatment, and Discharge/Disposal Description	STEP STEG RMF to fenced drip dispersal on approximately 9.91 acres of soil with a variable loading rate of .1 to .2 gpd / sf for 178 residential homes
Discharge/Disposal is to/near the following stream	Carters Creek, No Discharge.
Email comments to	water.permits@tn.gov

TO WHOM IT MAY CONCERN: The application described above has been submitted for wastewater facility operation and discharge/disposal permit pursuant to The Tennessee Water Quality Act of 1977, TCA 69-3-108. The purpose of this notice is to advise all concerned of the proposal for which a permit is sought and to solicit comments and information necessary to evaluate the probable impact of the activities upon the respective water resources. The decision whether to issue or deny will in part be based upon that evaluation.

Persons wishing to comment on or object to the issuance of a proposed permit are invited to submit comments in writing to the address listed below or to email account water.permits@tn.gov. The applicant's name and permit number should be referenced. Written statements received on or before the date of expiration of the comment period will become part of the record and will be considered in the determination.

Interested persons may also request in writing that the Division hold a public hearing on any application. The request must be filed within the comment period and must indicate the interest of the person requesting and the reasons why a hearing is warranted. When there is sufficient public interest, the director shall hold a hearing in accordance with Rule 0400-40-5-.06 (12).

After consideration of comments submitted during the public comment period, the hearing record, if any, and the requirements of federal and State law, the director of the Division will make a determination regarding the final action on the permit. Permit applications, supporting documentation, and related comments are available for review and/or copying or on the TDEC DataViewer at <https://www.tn.gov/environment/about-tdec/tdec-dataviewers.html>

**Division of Water Resources
Davy Crockett Tower
500 James Roberson Pkwy, 9th Floor
Nashville, Tennessee 37243-1102**

Instructions for the Public Notice of Application Sign

This sample Public Notice Sign is being provided for you to use. A Public Notice of Application sign must be displayed for a period of 30 days minimum. The purpose of the sign is to notify the public of its opportunity to comment, object, or to request a public hearing on the proposed permit action.

Pursuant to T.C.A. Rules, Chapter 0400-40-5-.06 (1) and (10), effective July 23, 2004, applicants for new or expanded discharges must notify the public by posting a sign near the point of the proposed facility entrance within view of a public road. The size must be of such size as to be legible from the public road.

It is recognized that it is impracticable print all of the required sign wording at a size that it can be read from the carriage way. Thus, to meet the intent of the rule, only the words "PUBLIC NOTICE" and "APPLICATION TO DISCHARGE/ DISPOSE OF WASTEWATER" must be readable from the carriage way. The remainder of the wording must be legible from the shoulder of the roadway.

Applicants should maintain some proof of sign posting and their compliance with the 30-day minimum posting period. Examples of proof could be dated photographs of the posted sign, an affidavit prepared by a witness of the posted sign, or confirmation by Division field staff.

Please be advised that in addition to this public notice of application, the Division will issue a Public Notice at the time a draft permit is proposed. Persons receiving this mailing include, but are not limited to, the applicant, governmental agencies with jurisdictions over the facility, federal and state agencies with jurisdiction over fish and wildlife resources and historic preservation, and interested persons having asked to be included on the public notice list.



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
Davy Crockett Tower, 9th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

April 22, 2026

Mr. Matt Nicks
President
Edge Wastewater
e-copy: mnicks@edgwastewater.com
410 New Salem Highway
Suite 100
Murfreesboro, TN 37129

Subject: **Draft of State Operating Permit No. SOP-25037**
Edge Wastewater, LLC
Baker Farms Treatment Facility
Columbia, Maury County, Tennessee

Mr. Nicks:

Enclosed please find one copy of the draft state operating permit SOP-25037, which the Division of Water Resources (the Division) proposes to issue. The issuance of this permit is contingent upon your meeting all of the requirements of the Tennessee Water Quality Control Act and the rules and regulations of the Tennessee Water Quality, Oil and Gas Board.

TDEC's approval of this land application waste treatment system shall not be construed as creating a presumption of correct operation nor as warranting by the commissioner that the approved facilities will reach the designated goals. T.C.A. § 69-3-108(i). Similarly, TDEC's issuance of a state operating permit in no way guarantees that this land application system will function properly. Notwithstanding these approvals, owners and operators are required to ensure that operation of this system does not result in pollution of waters of the state, including groundwater.

If you disagree with the provisions and requirements contained in the draft permit, you have thirty (30) days from the date of this correspondence to notify the division of your objections. If your objections cannot be resolved, you may appeal the issuance of this permit. This appeal should be filed in accordance with Section 69-3-110, Tennessee Code Annotated.

If you have questions, please contact the Columbia EFO at 1-888-891-TDEC; or, at this office, please contact Mr. Bryan Pope at (931) 224-3098 or by E-mail at bryan.pope@tn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Harris", with a stylized flourish at the end.

Brad Harris, P.E.
Deputy Director, Land-Based Systems

Enclosure

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
Davy Crockett Tower-9th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

Permit No. SOP-25037

PERMIT

For the operation of Wastewater Treatment Facilities

In accordance with the provision of Tennessee Code Annotated section 69-3-108 and Regulations promulgated pursuant thereto:

PERMISSION IS HEREBY GRANTED TO

Edge Wastewater, LLC
Baker Farms Treatment Facility
Columbia, Maury County, Tennessee

FOR THE OPERATION OF

STEP STEG RMF to fenced drip dispersal located at latitude 35.7627 and longitude -87.7627 in Maury County, Tennessee to serve 178 residential homes by the Baker Farms Treatment Facility. The design capacity of the system is .0534 MGD and will be dispersed on approximately 9.91 acres of suitable soil. A variable loading rate of .1 to .2 gpd / sf will be utilized.

This permit is issued as a result of the application filed on January 12, 2026, in the office of the Tennessee Division of Water Resources. This permit is contingent on the submission and department approval of construction plans, specifications and other data in accordance with rules of the department. Updated plans and specifications must be approved before any further construction activity.

This permit shall become effective on:

This permit shall expire on:

Issuance date :

for April Grippo
Director

A. GENERAL REQUIREMENTS

The treatment system shall be monitored by the permittee as specified below:

<u>Parameter</u>	<u>Sample Type</u>	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>Measurement Frequency</u>
Flow *	Totalizer			Daily
BOD ₅	Grab	45 mg/l	N/A	Once/Year
Ammonia as N	Grab	Report	N/A	Once /Quarter
<i>E. Coli</i>	Grab	941 colonies/100 ml	N/A	Once /Quarter

No E. Coli monitoring if fields are fenced

* Report average daily flow for each calendar month.

Sampling requirements in the table above apply to effluent being discharged to the drip irrigation plots.

This permit allows the operation of a wastewater collection, treatment, and storage system with disposal of treated wastewater through approved land application areas. There shall be no discharge of wastewater to any surface waters or to any location where it is likely to enter surface waters. There shall be no discharge of wastewater to any open throat sinkhole. In addition, the drip irrigation system shall be operated in a manner preventing the creation of a health hazard or a nuisance.

TDEC's approval of this land application waste treatment system shall not be construed as creating a presumption of correct operation nor as warranting by the commissioner that the approved facilities will reach the designated goals. T.C.A. § 69-3-108(i). Similarly, TDEC's issuance of a state operating permit in no way guarantees that this land application system will function properly. Notwithstanding these approvals, owners and operators are required to ensure that operation of this system does not result in pollution of waters of the state, including groundwater.

The land application component shall be operated and maintained to ensure complete hydraulic infiltration within the soil profile, transmission of the effluent away from the point of application, and full utilization of the soil profile as a portion of the treatment system.

Instances of surface saturation, ponding or pooling within the land application area as a result of system operation are prohibited. Instances of surface saturation, ponding or pooling shall be promptly investigated and noted on the Monthly Operations Report. The report shall include details regarding location(s), determined cause(s), the actions taken to eliminate the issue, and

the date the corrective actions were made. Any instances of surface saturation, ponding or pooling not associated with a major precipitation event not corrected within three days of discovery shall be reported to the local Environmental Field Office at that time for investigation. Surface saturation, ponding or pooling resulting in the discharge of treated wastewater into Waters of the State or to locations where it is likely to move to Waters of the State shall be immediately reported to the local Environmental Field Office, unless the discharge is separately authorized by a NPDES permit.

All drip fields shall be fenced sufficiently to prevent or impede unauthorized entry as well as to protect the facility from vandalism. Fencing shall be a minimum of four feet in height. Fencing shall be constructed of durable materials. Gates shall be designed and constructed in a manner to prevent or impede unauthorized entry. All designs are subject to division approval. Fence shall be installed prior to beginning operation.

All drip lines shall be buried and maintained 6 to 10 inches below the ground surface.

The site shall be inspected by the certified operator or his/her designee, at a minimum, once per fourteen days (default) OR in accordance with an operating and maintenance inspection schedule in the permit administrative file record. The default inspection frequency will apply if an operating and maintenance inspection schedule is not submitted to be a part of the permit administrative file record. The operating and maintenance inspection schedule shall at a minimum evaluate the following via onsite visits or telemetry monitoring or a combination of the two:

- the condition of the treatment facility security controls (doors, fencing, gates, etc.),
- the condition of the drip area security controls (doors, fencing, gates, etc.),
- the condition of the site signage,
- the operational status of the mechanical parts of the treatment system (pumps, filters, telemetry equipment, etc.)
- the condition of the UV bulbs (if applicable)
- the condition of the land application area including the location of any ponding
- the name of the inspector
- the description of any corrective actions

Submission of the schedule, or revisions to the schedule, may be submitted to the division electronically. The schedule shall be submitted on or before the effective date of the permit. The permittee is responsible for maintaining evidence that the schedule, or revisions, have been submitted to the division.

B. MONITORING PROCEDURES

1. Representative Sampling

Samples and measurements taken in compliance with the monitoring requirements specified above shall be representative of the volume and nature of the monitored discharge, and shall be taken at the following location(s):

Effluent to drip irrigation plots.

2. Test Procedures

Unless otherwise noted in the permit, all pollutant parameters shall be determined according to methods prescribed in Title 40, CFR, Part 136.

C. DEFINITIONS

The "daily maximum concentration" is a limitation on the average concentration, in milligrams per liter, of the discharge during any calendar day.

The "*monthly average concentration*", other than for *E. coli* bacteria, is the arithmetic mean of all the composite or grab samples collected in a one-calendar month period.

A "grab sample" is a single influent or effluent sample collected at a particular time.

For the purpose of this permit, "*continuous monitoring*" means collection of samples using a probe and a recorder with at least one data point per dosing cycle.

A "quarter" is defined as any one of the following three-month periods: January 1 through March 31, April 1 through June 30, July 1 through September 30, and/or October 1 through December 31.

"Wastewater" for the purpose of this permit means "sewage" as defined in TCA 69-3-103

D. REPORTING

1. Monitoring Results

Monitoring results shall be recorded consistent with the general requirements imposed in Part A above OR in accordance with the operating and maintenance inspection schedule in the permit administrative file record and submitted quarterly.

Submittals shall be postmarked no later than 15 days after the completion of the reporting period. A copy should be retained for the permittee's files. Monitoring results shall be reported in a format approved by the division. Operation reports and any communication regarding compliance with the conditions of this permit must be sent to:

Division of Water Resources
Columbia Environmental Field Office
1421 Hampshire Pike
Columbia, TN 38401

Sampling results may be submitted electronically to: DWRWW.Report@tn.gov.

The first operation report is due on the 15th of the month following the quarter containing the permit effective date. Until the construction of the treatment system is complete and the treatment system is placed into operation, operational reports shall report "monitoring not required".

2. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in Rule 0400-40-05-.07(2)(h)2, the results of such monitoring shall be included in the calculation and reporting of the values required in the Quarterly Operation Report. Such increased frequency shall also be indicated.

3. Falsifying Reports

Knowingly making any false statement on any report required by this permit may result in the imposition of criminal penalties as provided for in Section 69-3-115 of the Tennessee Water Quality Control Act.

4. Signatory Requirement

All reports or information submitted to the commissioner shall be signed and certified by the persons identified in Rules 0400-40-06-.03 (4) (a-c).

PART II

A. GENERAL PROVISIONS

1. Duty to Reapply

The permittee is not authorized to discharge after the expiration date of this permit. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit such information and forms as are required to the Director of Water Resources (the "Director") no later than 180 days prior to the expiration date.

2. Right of Entry

The permittee shall allow the Director, or authorized representatives, upon the notification of permittee and presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or where records are required to be kept under the terms and conditions of this permit, and at reasonable times to copy these records.

b. To inspect at reasonable times any monitoring equipment or method or any collection, treatment, pollution management, or discharge facilities required under this permit; and

- c. To sample at reasonable times any discharge of pollutants.

3. Availability of Reports

All reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Division of Water Resources.

4. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also include adequate laboratory and process controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. Backup continuous pH and flow monitoring equipment are not required.

The monitoring frequency stated in this permit shall not be construed as specifying a minimum level of operator attention to the facility. It is anticipated that visits to the treatment facility by the operator will occur at intervals frequent enough to assure proper operation and maintenance, but in no case less than one visit every fourteen days OR in accordance with an operating and maintenance inspection schedule in the permit administrative file record. If monitoring reports, division's inspection reports, or other information indicates a problem with the facility, the permittee may be subject to enforcement action and/or the permit may be modified to include increased parameter monitoring, increased monitoring frequency or other requirements as deemed necessary by the division to correct the problem. The permittee shall ensure that the certified operator is in charge of the facility and observes the operation of the system frequently enough to ensure its proper operation and maintenance regardless of the monitoring frequency stated in the permit.

Dilution water shall not be added to comply with effluent requirements.

5. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

6. Severability

The provisions of this permit are severable. If any provision of this permit due to any circumstance, is held invalid, then the application of such provision to other circumstances and to the remainder of this permit shall not be affected thereby.

7. Other Information

If the permittee becomes aware that he failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or in any report to the Director, then he shall promptly submit such facts or information.

B. CHANGES AFFECTING THE PERMIT

1. Planned Changes

The permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility.

2. Permit Modification, Revocation, or Termination

a. This permit may be modified, revoked and reissued, or terminated for cause as described in Section 69-3-108 (h) of the Tennessee Water Quality Control Act as amended.

b. The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

3. Change of Ownership

This permit may be transferred to another person by the permittee if:

a. The permittee notifies the Director of the proposed transfer at least 30 days in advance of the proposed transfer date;

b. The notice includes a written agreement between the existing and new permittees containing a specified date for transfer of permit responsibility, coverage, and liability between them; and

c. The Director, within 30 days, does not notify the current permittee and the new permittee of his intent to modify, revoke or reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

4. Change of Mailing Address

The permittee shall promptly provide to the Director written notice of any change of mailing address. In the absence of such notice the original address of the permittee will be assumed to be correct.

C. NONCOMPLIANCE

1. Effect of Noncompliance

Any permit noncompliance constitutes a violation of applicable State laws and is grounds for enforcement action, permit termination, permit modification, or denial of permit reissuance.

2. Reporting of Noncompliance

a. 24-Hour Reporting

In the case of any noncompliance which could cause a threat to public drinking supplies, or any other discharge which could constitute a threat to human health or the environment, the required notice of non-compliance shall be provided to the appropriate Division environmental field office within 24 hours from the time the permittee becomes aware of the circumstances. (The environmental field office should be contacted for names and phone numbers of emergency response personnel.)

A written submission must be provided within five days of the time the permittee becomes aware of the circumstances unless this requirement is waived by the Director on a case-by-case basis. The permittee shall provide the Director with the following information:

- i. A description of the discharge and cause of noncompliance.
- ii. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and
- iii. The steps being taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.

b. Scheduled Reporting

For instances of noncompliance which are not reported under subparagraph 2.a. above, the permittee shall report the noncompliance on the Quarterly Operation Report. The report shall contain all information concerning the steps taken, or planned, to reduce, eliminate, and prevent recurrence of the violation and the anticipated time the violation is expected to continue.

3. Overflow

a. "**Overflow**" means the discharge of wastewater from any portion of the collection, transmission, or treatment system other than through permitted outfalls.

b. Overflows are prohibited.

c. The permittee shall operate the collection system so as to avoid overflows.

d. No new or additional flows shall be added upstream of any point in the collection system, which experiences chronic overflows (greater than 5 events per year) or would otherwise

overload any portion of the system. Unless there is specific enforcement action to the contrary, the permittee is relieved of this requirement after: 1) an authorized representative of the Commissioner of the Department of Environment and Conservation has approved an engineering report and construction plans and specifications prepared in accordance with accepted engineering practices for correction of the problem; 2) the correction work is underway; and 3) the cumulative, peak-design, flows potentially added from new connections and line extensions upstream of any chronic overflow point are less than or proportional to the amount of inflow and infiltration removal documented upstream of that point. The inflow and infiltration reduction must be measured by the permittee using practices that are customary in the environmental engineering field and reported in an attachment to a Monthly Operating Report submitted to the local TDEC Environmental Field Office on a quarterly basis. The data measurement period shall be sufficient to account for seasonal rainfall patterns and seasonal groundwater table elevations.

c. In the event that more than 5 overflows have occurred from a single point in the collection system for reasons that may not warrant the self-imposed moratorium or completion of the actions identified in this paragraph, the permittee may request a meeting with the Division of Water Resources EFO staff to petition for a waiver based on mitigating evidence.

4. Upset

a. *"Upset"* means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

b. An upset shall constitute an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- i. An upset occurred, and that the permittee can identify the cause(s) of the upset;
- ii. The permitted facility was at the time being operated in a prudent and workman-like manner and in compliance with proper operation and maintenance procedures;
- iii. The permittee submitted information required under "Reporting of Noncompliance" within 24-hours of becoming aware of the upset (if this information is provided orally, a written submission must be provided within five days); and
- iv. The permittee complied with any remedial measures required under "Adverse Impact."

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the waters of Tennessee resulting from noncompliance with this permit, including such accelerated

or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

6. Bypass

- a. *"Bypass"* is the intentional diversion of wastewater away from any portion of a treatment facility.
- b. Bypasses are prohibited, unless:
 - i. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - ii. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated waste, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - iii. For anticipated bypass, the permittee submits prior notice, if possible, at least ten days before the date of the bypass; or
 - iv. For unanticipated bypass, the permittee submits notice of an unanticipated bypass within 24 hours from the time that the permittee becomes aware of the bypass.
- c. A bypass that does not cause effluent limitations to be exceeded may be allowed only if the bypass is necessary for essential maintenance to assure efficient operation.
- d. *"Severe property damage"* when used to consider the allowance of a bypass means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

D. LIABILITIES

1. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. Notwithstanding this permit, the permittee shall remain liable for any damages sustained by the State of Tennessee, including but not limited to fish kills and losses of aquatic life and/or wildlife, as a result of the discharge of wastewater to any surface or subsurface waters. Additionally, notwithstanding this Permit, it shall be the responsibility of the permittee to conduct its wastewater treatment and/or discharge activities in a manner such that public or private nuisances or health hazards will not be created.

2. Liability Under State Law

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law.

**PART III
OTHER REQUIREMENTS**

A. CERTIFIED OPERATOR

The waste treatment facilities shall be operated under the supervision of a Biological Natural System certified wastewater treatment operator and collection system shall be operated under the supervision of a grade I certified collection system operator in accordance with the Water Environmental Health Act of 1984.

B. PLACEMENT OF SIGNS

The permittee shall place a sign at the entrance to the land application area if fenced or all reasonable approaches to the land application area. The sign should be clearly visible to the public. The minimum sign size should be two feet by two feet (2' x 2') with one-inch (1") letters. The sign should be made of durable material

**RECLAIMED WASTEWATER
DRIP IRRIGATION
(PERMITTEE'S NAME)
(PERMITTEE'S PHONE NUMBER)
TENNESSEE DIVISION OF WATER
RESOURCES
Columbia Environmental Field Office
PHONE NUMBER: 1-888-891-8332**

No later than sixty (60) days from the effective date of the permit, the permittee shall have the above sign(s) on display in the location specified. New facilities must have the signs installed upon commencing operation.

C. ADDITION OF WASTE LOADS

The permittee may not add waste loads to the existing treatment system without the knowledge and approval of the division.

D. SEPTIC (STEP) TANK OPERATION

The proper operation of this treatment system depends, largely, on the efficient use of the septic tank. The solids that accumulate in the tank shall be removed at a frequency that is sufficient to insure that the treatment plant will comply with the discharge requirements of this permit.

E. SEPTAGE MANAGEMENT PRACTICES

The permittee must comply with the provisions of Rule 0400-48-01-.22. If the septage is transported to another POTW for disposal, the permittee shall note the amount of septage wasted in gallons and name of the facility the hauler intends to use for disposal of the septage on the monthly operation report. Sludge or any other material removed by any treatment works must be disposed of in a manner which prevents its entrance into or pollution of any surface or subsurface waters. Additionally, the disposal of such sludge or other material must be in compliance with the Tennessee Solid Waste Disposal Act, TCA 68-31-101 et seq. and Tennessee Hazardous Waste Management Act, TCA 68-46-101 et seq.

F. OWNERSHIP OF THE TREATMENT FACILITIES

a. The permittee shall own the treatment facilities (and the land upon which they are constructed) including the land to be utilized for drip or spray irrigation. Evidence of ownership of the treatment facility and land application site(s) must be furnished to the division for approval prior to initiation of operation of the wastewater collection and treatment system for sewer service to any structure.

b. Where the treatment facility serves private homes, condominiums, apartments, retirement homes, nursing homes, trailer parks, or any other place where the individuals being served have property ownership, rental agreements, or other agreements that would prevent their being displaced in the event of abandonment or noncompliance of the sewerage system, ownership of the treatment facilities must be by a municipality, a public utility, a wastewater authority, or a privately owned public utility (having a Certificate of Convenience and Necessity from the Tennessee Public Utility Commission) or another public agency.

Attachment 1

RATIONALE

Edge Wastewater, LLC
STATE OPERATION PERMIT NO. SOP-25037
Columbia, Maury County, Tennessee

Permit Writer: Bryan Pope

FACILITY CONTACT INFORMATION:

Mr. Matt Nicks
President
Phone: (615) 969-6564
mnicks@edgwastewater.com
410 New Salem Highway
Murfreesboro, TN 37129

Activity Description: Treatment of domestic wastewater via a decentralized wastewater system to support construction of Baker Farms Wastewater Treatment Facility.

Facility location: Latitude 35.7627 and Longitude -87.7627

Name of the nearest stream: Carters Creek. No discharge allowed

Treatment system: STEP STEG RMF to fenced drip dispersal on approximately 9.91 acres of soil with a variable loading rate of .1 to .2 gpd / sf for 178 residential homes

Permit period: This permit will be issued for a five-year period effective from the issuance date on the title page.

Terms & Conditions: BOD₅ is a standard measure of sewage strength. The 45 mg/L daily maximum limit is the required treatment standard for domestic wastewater in Tennessee. Ammonia and BOD₅ reporting serve to demonstrate the treatment system is meeting minimum treatment standards. Land application, versus stream discharge, enables reduced monitoring frequency for these parameters. Narrative conditions for drip disposal and septage management are proposed in support of proper system operation to prevent runoff to streams and avoidance of nuisance conditions. E. coli limits apply when the disposal area is not fenced.

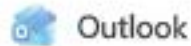
Financial Security: Municipalities and Utility Districts are government entities exempt from the financial security requirement in TCA 69-3-122.

Annual Maintenance Fee: An annual maintenance fee for the permit will apply after permit issue and upon receipt of an invoice. The fee is currently \$350.00 for non-discharging facilities with influent flow less than 0.075 MGD.

Items Requisite for Operation:

This draft permit proposes terms and conditions for planning purposes and to seek public comment on the potential water quality impacts of the proposed activity. Actual operation of the sewerage system is contingent on the following items (items may occur in any order):

- Approval of sewerage system construction plans and specifications per TCA 69-3-108(i),
- Final construction inspection and submission of O & M manual per Rule 0400-40-02-.09,
- Utility ownership of sewerage system assets consistent with Rule 0400-40-16-.02(8). Sewerage system assets broadly consist of those units integral to the collection, treatment and disposal of both the solid and liquid component of sewage (i.e. septic tanks and pumps, collection lines, treatment system and drip irrigation area and related appurtenances), and
- Final issue of the permit.



RE: signed draft permit Baker Farms

From Bryan Pope <Bryan.Pope@tn.gov>
Date Mon 6/29/2026 7:01 AM
To Matt Nicks <mnicks@edgewastewater.com>

Good morning Matt.

Please send an updated application showing the change. I can make the alteration on the final permit unless you prefer a new draft and go back through public notice.

Thank you,

Bryan

From: Matt Nicks <mnicks@edgewastewater.com>
Sent: Saturday, June 27, 2026 1:08 PM
To: Bryan Pope <Bryan.Pope@tn.gov>
Subject: [EXTERNAL] Re: signed draft permit Baker Farms

Bryan -

We need to change the name on the permit from Edge Wastewater LLC to Edge Wastewater Utilities LLC, what do we need to do?

Thanks.
M

Matt Nicks
Edge Wastewater
615.969.6564
mnicks@edgewastewater.com

From: Bryan Pope <Bryan.Pope@tn.gov>
Sent: Wednesday, April 22, 2026 11:06 AM
To: Matt Nicks <mnicks@edgewastewater.com>
Subject: signed draft permit Baker Farms

Morning Matt.

The first draft permit had an error in the description. Corrected here. The public notice was correct and went out yesterday.

Thanks,

Bryan



Bryan Pope Environmental Consultant
Division of Water Resources
Davy Crockett Tower
500 James Robertson Pkwy, 9th Floor
Nashville, Tennessee 37243
931 224-3098 / bryan.pope@tn.gov

Exhibit 25

NARUC Chart of Accounts

[illegible]

Exhibit 26

Plant in Service Account Numbers

Assets and Other Debits

Utility Plant

Account No.

101.	Utility Plant in Service
102.	Utility Plant Leased to Others
103.	Property Held for Future Use
104.	Utility Plant Purchased or Sold
105.	Construction Work in Progress
106.	Completed Construction Not Classified
108.	Accumulated Depreciation
	108.1 Accumulated Depreciation of Utility Plant in Service
	108.2 Accumulated Depreciation of Utility Plant Leased to Others
	108.3 Accumulated Depreciation of Property Held for Future Use
110.	Accumulated Amortization
	110.1 Accumulated Amortization of Utility Plant in Service
	110.2 Accumulated Amortization of Utility Plant Leased to Others
114.	Utility Plant Acquisition Adjustments
115.	Accumulated Amortization of Utility Plant Acquisition Adjustments
116.	Other Utility Plant Adjustments

Other Property and Investments

121.	Nonutility Property
122.	Accumulated Depreciation and Amortization of Nonutility Property

123.	Investment in Associated Companies
124.	Utility Investments
125.	Other Investments
126.	Sinking Funds
127.	Other Special Funds

Current and Accrued Assets

131.	Cash
	131.1 Cash on Hand
	131.2 Cash in Bank
132.	Special Deposits
133.	Other Special Deposits
134.	Working Funds
135.	Temporary Cash Investments
141.	Customer Accounts Receivable
142.	Other Accounts Receivable
143.	Accumulated Provision for Uncollectible Accounts – Credit
144.	Notes Receivable
145.	Accounts Receivable from Associated Companies
146.	Notes Receivable from Associated Companies
151.	Plant Material and Supplies
152.	Merchandise
153.	Other Material and Supplies
161.	Stores Expense
162.	Prepayments
171.	Accrued Interest and Dividends Receivable
172.	Rents Receivable

173.	Accrued Utility Revenues
174.	Miscellaneous Current and Accrued Assets

Deferred Debits

181.	Unamortized Debt Discount and Expense
182.	Extraordinary Property Losses
183.	Preliminary Survey and Investigation Charges
184.	Clearing Accounts
185.	Temporary Facilities

Deferred Debits (cont.)

186.	Miscellaneous Deferred Debits
	186.1 Deferred Rate Case Expense
	186.2 Other Deferred Debits
	186.3 Regulatory Assets
187.	Research and Development Expenditures
190.	Accumulated Deferred Income Taxes
	190.1 Accumulated Deferred Federal Income Taxes
	190.2 Accumulated Deferred State Income Taxes
	190.3 Accumulated Deferred Local Income Taxes

Equity Capital and Liabilities Equity Capital

201.	<u>Common Stock Issued</u>
202.	<u>Common Stock Subscribed</u>
203.	<u>Common Stock Liability for Conversion</u>
204.	<u>Preferred Stock Issued</u>
205.	<u>Preferred Stock Subscribed</u>
206.	<u>Preferred Stock Liability For Conversion</u>
207.	<u>Premium on Capital Stock</u>
209.	<u>Reduction in Par on Stated Value of Capital Stock</u>
210.	<u>Gain on Resale or Cancellation of Reacquired Capital Stock</u>
211.	<u>Other Paid-in Capital</u>
212.	<u>Discount on Capital Stock</u>
213.	<u>Capital Stock Expense</u>
214.	<u>Appropriated Retained Earnings</u>
215.	<u>Unappropriated Retained Earnings</u>
216.	<u>Reacquired Capital Stock</u>
218.	<u>Proprietary Capital (for proprietorships and partnerships only)</u>

Long-Term Debt

221.	<u>Bonds</u>
222.	<u>Reacquired Bonds</u>
223.	<u>Advances From Associated Companies</u>
224.	<u>Other Long-Term Debt</u>

Current and Accrued Liabilities

231.	<u>Accounts Payable</u>
232.	<u>Notes Payable</u>
233.	<u>Accounts Payable to Associated Companies</u>
234.	<u>Notes Payable to Associated Companies</u>
235.	<u>Customer Deposits</u>
236.	<u>Accrued Taxes</u>
	<u>236.1 Accrued Taxes, Utility Operating Income</u>
	<u>236.11 Accrued Taxes, Taxes Other Than Income</u>
	<u>236.12 Accrued Taxes, Income Taxes</u>
	<u>236.2 Accrued Taxes, Other Income and Deductions</u>
237.	<u>Accrued Interest</u>
	<u>237.1 Accrued Interest on Long-Term Debt</u>
	<u>237.2 Accrued Interest on Other Liabilities</u>
238.	<u>Accrued Dividends</u>
239.	<u>Matured Long-Term Debt</u>
240.	<u>Matured Interest</u>
241.	<u>Miscellaneous Current and Accrued Liabilities</u>

Deferred Credits

251.	<u>Unamortized Premium On Debt</u>
252.	<u>Advances for Construction</u>
253.	<u>Other Deferred Credits</u>
	<u>253.1 Regulatory Liabilities</u>
	<u>253.2 Other Deferred Liabilities</u>

Deferred Credits (cont.)

255.	<u>Accumulated Deferred Investment Tax Credits</u>
	<u>255.1 Accumulated Deferred Investment Tax Credits, Utility Operations</u>
	<u>255.2 Accumulated Deferred Investment Tax Credits, Non-Utility Operations</u>

Operating Reserves

261.	<u>Property Insurance Reserve</u>
262.	<u>Injuries and Damages Reserve</u>
263.	<u>Pensions and Benefits Reserve</u>
265.	<u>Miscellaneous Operating Reserves</u>

Contributions in Aid of Construction

271.	<u>Contributions in Aid of Construction</u>
272.	<u>Accumulated Amortization of Contributions in Aid of Construction</u>

Accumulated Deferred Income Taxes

281.	<u>Accumulated Deferred Income Taxes – Accelerated Amortization</u>
282.	<u>Accumulated Deferred Income Taxes – Other Property</u>
283.	<u>Accumulated Deferred Income Taxes – Other</u>

Utility Plant

101. Utility Plant in Service

- A. This account is the control account for plant accounts 351 through 398.
- B. This account shall include the original cost of utility plant, included in the plant accounts prescribed herein and in similar accounts for other utility departments, owned and used by the utility in its utility operations, and having an expected life in service of more than one year from date of installation, including such property owned by the utility but held by nominees. Separate subaccounts shall be maintained hereunder for each utility department and/or division.

400.	Operating Revenues
401.	Operating Expenses
403.	Depreciation Expenses
406.	Amortization of Utility Plant Acquisition Adjustment
407.	Amortization Expense
	407.1 Amortization of Limited Term Plant
	407.2 Amortization of Property Losses
	407.3 Amortization of Other Utility Plant
	407.4 Amortization of Regulatory Assets
	407.5 Amortization of Regulatory Liabilities
408.	Taxes Other Than Income
	408.10 Utility Regulatory Assessment Fees
	408.11 Property Taxes
	408.12 Payroll Taxes
	408.13 Other Taxes and Licenses
	408.20 Taxes Other than Income, Other Income and Deductions
409.	Income Taxes
	409.10 Federal Income Taxes, Utility Operating Income
	409.11 State Income Taxes, Utility Operating Income
	409.12 Local Income Taxes, Utility Operating Income
	409.20 Income Taxes, Other Income and Deductions
	409.30 Income Taxes, Extraordinary Items
410.	Provision for Deferred Income Taxes
	410.10 Deferred Federal Income Taxes
	410.11 Deferred State Income Taxes
	410.12 Deferred Local Income Taxes
	410.20 Provisions for Deferred Income Taxes - Credit, Other Income and Deductions
411.	Provision for Deferred Income Taxes – Credit, Utility Operating Income
	411.10 Provision for Deferred Income Taxes – Credit, Utility Operating Income
	411.20 Provision for Deferred Income Taxes – Credit, Other Income and Deductions
412.	Investment Tax Credits
	412.10 Investment Tax Credits Deferred to Future Periods, Utility Operating Income

	<u>412.11 Investment Tax Credits Restored to Operating Income, Utility Operations</u>
	<u>412.20 Investment Tax Credits – Net, Nonutility Operations</u>
	<u>412.30 Investment Tax Credits Restored to Nonoperating Income, Utility Operations</u>
413.	<u>Income From Utility Plant Leased to Others</u>
414.	<u>Gains (Losses) from Disposition of Utility Property</u>

Exhibit 35

Financial Security

Letter of Credit

IRREVOCABLE LETTER OF CREDIT

Tennessee Public Utility Commission
502 Deaderick St
4th Floor
Nashville, Tennessee 37243-0505

REFERENCE: Name of company authorized by TPUC: **Edge Wastewater Utilities, LLC**
Company ID# as assigned by the TPUC: **129291**
Irrevocable Letter of Credit Number: **1160118679**
Effective Date: **July 6, 2026**
Expiration Date: **July 6, 2027**

Sir/Madam:

The **Edge Wastewater Utilities, LLC** (the "Company") hereby requests that **FirstBank** (the "Lender") establish an irrevocable letter of credit, which will remain available on behalf of the Company who is applying for or holds a Certificate of Public Convenience and Necessity ("CCN") to operate public wastewater utilities subject to the laws of the State of Tennessee and the rules and regulations of the Tennessee Public Utility Commission ("TPUC"). Under the provisions of Title 65, Chapter 4, Section 201(e) of the Tennessee Code Annotated, as amended from time to time, the Company is required to obtain a letter of credit to maintain a CCN and to ensure the proper operation and maintenance of the public utility or project.

The Company and Lender hereby establish this letter of credit for the benefit of the TENNESSEE PUBLIC UTILITY COMMISSION as the beneficiary, in accordance with the provisions of Tennessee Code Annotated, Title 65, Chapter 4, Section 201(e) and Tenn. Comp. R. & Regs. 1220-4-13, in the full amount of **\$20,000.00** lawful money of the United States of America to be used to reduce any monetary amount imposed against the Company, its representatives, successors or assigns, in any proceeding brought under Title 65 of Tennessee Code Annotated by or on behalf of the TPUC, for which obligation we bind ourselves, our representatives, successors, and assigns, each jointly and severally, firmly and unequivocally by these presents.

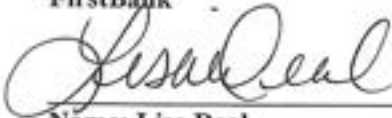
This letter of credit shall become effective on the **6th** day of **July, 2026**. The TPUC may draw upon this letter of credit, at any time and from time to time, by delivering a Letter of Credit Notice, substantially in the form set forth below (a "Notice"), which Notice shall specify the amount (the "Draw Amount") to be drawn and the bank account (the "Bank Account") to which the Draw Amount should be delivered and shall be signed by an official designated and duly authorized by the TPUC, to Lender at the address listed below, or to such other address as the Lender shall notify the TPUC in writing by certified mail. Promptly after the delivery of each Notice, the Lender hereby covenants and agrees to promptly deliver, by wire transfer of immediately available funds, the Draw Amount to the Bank Account.

This letter of credit is **intended to be renewed annually between Company and Lender**, without amendment for successive one-year periods. The Lender shall provide the TPUC at least a ninety (90) days written notice by certified mail in the event of a non-renewal or termination of this letter of credit, it being understood that the Lender shall not be relieved of liability that may have accrued under this letter of credit prior to the date of non-renewal or termination. The Lender hereby represents and warrants that it is qualified and authorized to issue this letter of credit and is a bank designated by the Treasurer of the State of Tennessee as an authorized depository bank for the deposit of state funds under Tenn. Code Ann. § 9-4-107. Except as otherwise expressly stated, this letter of credit is subject to the most recent edition of the Uniform Customs and Practice for Documentary Credits as published by the International Chamber of Commerce Publication.

THIS LETTER OF CREDIT IS ISSUED IN ACCORDANCE WITH THE TENNESSEE CODE ANNOTATED AS AMENDED FROM TIME TO TIME. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL.

Yours Very Truly,

FirstBank

A handwritten signature in cursive script, appearing to read "Lisa Deal", is written over a horizontal line.

Name: Lisa Deal

Title: VP Relationship Manager

Contact Information of Surety Agent

(Address, Telephone Number, and Email):

615 Memorial Blvd

Murfreesboro, TN 37129

615-907-5508

Lisa.deal@firstbankonline.com

LETTER OF CREDIT NOTICE

[Name of Lender]

[Address]

Re: Irrevocable Letter of Credit No. []

Dear Sir or Madam:

You are hereby notified, and the undersigned hereby certifies, that the undersigned is an official designated and duly authorized by the TPUC to deliver this notice and that a monetary amount of \$ (the "Draw Amount") has been imposed against [Applicant] its representatives, successors or assigns, in a proceeding brought under Title 65 of Tennessee Code Annotated by or on behalf of the TPUC.

Pursuant to that certain Irrevocable Letter of Credit referenced above, we hereby request that you deliver payment of the Draw Amount to the bank account listed below by wire transfer of immediately available funds:

Name of Bank Account: _____
Account Number: _____
ABA Routing Number: _____
Name of Contact: _____
Telephone Number: _____
Email Address: _____

Please confirm receipt of this Notice and the Federal Reserve wire confirmation number of the delivery of the Draw Amount by sending an email to the person at the number listed above.

Sincerely,

Tennessee Public Utility Commission

Name:

Title: