

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF ISHA FOUNDATION, INC.) **DOCKET NO. 26-00034**
FOR DECLARATORY JUDGMENT)
)
)

**CONSUMER ADVOCATE’S RESPONSES TO
ISHA’S FIRST SET OF DISCOVERY REQUESTS**

The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate” or “CA”), pursuant to Rules 26, 33, and 34 of the Tennessee Rules of Civil Procedure, Tennessee Public Utility Commission (“TPUC” or the “Commission”) Rule 1220-01-02-.11, and the Agreed Procedural Schedule entered by the Hearing Officer in this Docket, hereby submits its responses to *ISHA Foundation, Inc.’s* [“ISHA” or the “Company”] *Discovery Requests to the Consumer Advocate*, filed on July 16, 2026.

General Objections

All of the General Objections made herein are applicable to and are hereby incorporated into each and every response herein, and each response herein is made subject to and without waiver of these General Objections.

- A. The Consumer Advocate objects to each of the Company’s requests on the grounds that each is overly broad, unduly burdensome, and oppressive.
- B. The Consumer Advocate objects to the Company’s discovery requests to the extent that they purport to impose the obligations upon the Consumer Advocate beyond those contemplated by the Tennessee Rules of Civil Procedure, TPUC Rules, and Tennessee law.
- C. The Consumer Advocate objects to each of the Company’s requests to the extent that each purports to call for information and/or documents prepared in anticipation of litigation, and/or information and/or documents protected by the attorney-client

privilege, the work product doctrine, the common-interest doctrine, or any other applicable protection or privilege.

- D. The Consumer Advocate objects to each of the Company's requests to the extent that they are not applicable in the context of a proceeding before the TPUC, cite an incorrect legal conclusion, or mischaracterize or improperly summarize statements made by the Consumer Advocate's expert witnesses in their pre-filed direct testimonies.
- E. By providing the objections contained herein, the Consumer Advocate does not waive or intend to waive, but rather, intends to preserve, all objections with regard to competence, relevance, materiality, and admissibility of the discovery information or documents in any subsequent proceeding on the related subject matter. Moreover, the Consumer Advocate intends by this set of responses to preserve all objections to vagueness, ambiguity, and undue burden in connection with requests to produce documents, including those that are not in the Consumer Advocate's possession, custody, or control.
- F. The responses made herein are made to the best of Consumer Advocate's present knowledge after a reasonably diligent search for responsive information. The Consumer Advocate will supplement its responses in line with the requirements of the Tennessee Rules of Civil Procedure as well as TPUC Rules and expressly reserves its right to supplement or amend its answers, if and as appropriate, including with respect to objections that may arise at a later time than this filing.

Without waiving these General Objections as they apply to each individual request, the Consumer Advocate presents the following responses:

CONSUMER ADVOCATE'S RESPONSES TO INTERROGATORIES

- 1-01.** State the full name, present occupation, present employer, residence and business addresses of the person(s) answering these Discovery Requests, the person(s) who assisted in the preparation of the answers to these Discovery Requests, the person(s) who provided any information or documents or things reviewed in connection with the preparation of the answers to these Discovery Requests, and the person(s) who provided documents or things or is otherwise in possession of documents or things that are responsive to the Requests for Production below.

RESPONSE:

- Karen Stachowski, Esq., Attorney, Office of the Attorney General, 500 Dr. Martin L. King Jr. Blvd., Nashville, TN 37243.
- Shilina Brown, Esq., Attorney, Office of the Attorney General, 500 Dr. Martin L. King Jr. Blvd., Nashville, TN 37243.
- Ryan, McGehee, Esq., Attorney, Office of the Attorney General, 500 Dr. Martin L. King Jr. Blvd., Nashville, TN 37243.

1-02. Identify all documents referred to or relied upon by you in preparation of your answers to the Discovery Requests.

RESPONSE:

The Consumer Advocate objects to this request to the extent it calls for attorney work product. Without waiving this objection, the Consumer Advocate responds as follows:

- Emails from Tennessee Department of Environment & Conservation

1-03. Identify all documents you intend to introduce as exhibits at the hearing in this matter.

RESPONSE:

The Consumer Advocate objects to this question because it is premature and not yet ripe. The oral argument/hearing in this docket has been scheduled for November 2, 2026, which is over three months from now. Further, the Consumer Advocate is still in the process of gathering evidence and preparing its case. Prior to the hearing and as directed by the Administrative Judge, the Consumer Advocate will provide and supplement accordingly all documents that it intends to refer to or rely upon at oral argument/hearing.

Without waiving the above objection, the Consumer Advocate anticipates that it will introduce all docket filings and attachments filed in the docket file. Most of the documents the Consumer Advocate intends to refer to or rely upon are equally available to the opposing party and counsel. The Consumer Advocate will reference, rely on and/or introduce the following

additional documents:

- Documents and information obtained from the Tennessee Department of Environment & Conservation
- ISHA website pages from <https://isha.sadhguru.org/us/en>
- In re Petition of Isha Foundation, Inc. to Determine if a CCN is Needed, *Initial Determination That a CCN is Required*, Docket No. 25-00018 (May 30, 2025).
- In re: Petition of Isha Foundation, Inc. to Determine if a CCN is Needed, *Initial Determination That CCN is Not Required*, Docket No. 24-00077 (March 3, 2025).
- In re: Petition of Isha Foundation, Inc. to Determine if a CCN is Needed, *Initial Determination That CCN is Not Required*, Docket No. 22-00099 (November 14, 2022).
- 2025 ISHA Kamala Lot Lease Agreement, Phase 1

1-04. Describe in detail all communications and correspondence that you, including lawyers, staff and consultants, have had with the Tennessee Department of Environment and Conservation (“TDEC”), its agents, lawyers and/or its employees concerning ISHA since April 21, 2026 including any and all communications and correspondence sent or responded to on your behalf; include the dates of the communications and correspondence; and identify the subject matter and details of the communications and correspondence.

RESPONSE:

Exhibit A. The following emails:

- Email dated May 11, 2026, from Karen Stachowski to Jennifer Innes.
- Email dated May 11, 2026, from Jennifer Innes to Karen Stachowski and Brad Ulmer.
- Email dated May 11, 2026, from Karen Stachowski and Brad Ulmer.
- Email dated May 14, 2026, from Brad Ulmer to Karen Stachowski and Jennifer Innes.
- Email dated May 15, 2026, from Karen Stachowski to Brad Ulmer and Jennifer Innes.
- Email dated May 15, 2026, from Lonnie McCloud to Karen Stachowski, Brad Ulmer and Jennifer Innes.
- Email dated May 15, 2026, from Karen Stachowski to Lonnie McCloud, Brad Ulmer and Jennifer Innes.

1-05. Describe in detail all communications and correspondence that you, including lawyers, staff and consultants, have had with the Warren County Utility District, its agents, attorneys and/or its employees concerning ISHA since April 21, 2026 including any and all

communications and correspondence sent or responded to on your behalf; include the dates of the communications and correspondence; and identify the subject matter and details of the communications and correspondence.

RESPONSE:

The Consumer Advocate objects to this request to the extent it calls for attorney work product. Without waiving this objection, the Consumer Advocate responds as follows:

- Exhibit B. Email dated May 13, 2026, from Ryan McGehee to Mike Corley.

REQUEST FOR PRODUCTION OF DOCUMENTS

1-01. Produce all documents you reviewed or relied upon in preparing your responses to the Interrogatories.

RESPONSE:

See all documents referred to in the responses to interrogatories 1-01 to 1-05.

1-02. Produce all communications or documents that evidence communications (emails, summaries of meetings or phone calls, etc.) between you and TDEC, including but not limited to communications with lawyers, staff or consultants since April 21, 2026.

RESPONSE:

See all documents referred to in the responses to interrogatories 1-01 to 1-05.

1-03. Produce all communications or documents that evidence communications (emails, summaries of meetings or phone calls, etc.) between you and the Warren County Utility District including but not limited to communications with lawyers, staff or consultants since April 21, 2026.

RESPONSE:

See all documents referred to in the responses to interrogatories 1-01 to 1-05.

REQUEST FOR ADMISSIONS

1-01. Admit or deny that the proposed ISHA Golf project is located within the service territory of the Warren County Utility District.

Admit.

RESPECTFULLY SUBMITTED,



SHILINA BROWN (BPR No. 020689)
Senior Assistant Attorney General
RYAN MCGEHEE (BPR No. 025559)
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Phone: (615) 741-2357
Email: Shilina.Brown@ag.tn.gov
Email: Ryan.Mcgehee@ag.tn.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail, with
a courtesy copy by electronic mail provided upon:

Henry Walker, Esq.
Bradley Arant Boult Cummings LLP
1221 Broadway, Suite 2400
Nashville, TN, 37203
Email: hmwalker@bradley.com

This 24th day of July, 2026.



SHILINA B. BROWN
Senior Assistant Attorney General

Exhibit A

From: [Karen H. Stachowski](#)
To: [Lonnie McCloud](#); [Brad Ulmer](#); [Jennifer Innes](#)
Cc: [Rosalie Gunger](#); [Shilina B. Brown](#)
Subject: RE: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry
Date: Friday, May 15, 2026 9:22:28 AM
Attachments: [image001.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Thanks for responding so quickly, and for the copy of the water quality analysis.

Karen H. Stachowski | Deputy Attorney General
Consumer Advocate Division
Office of Tennessee Attorney General
500 Dr. Martin L. King Jr. Blvd., Nashville, TN 37243
Mailing Address:
P.O. Box 20207, Nashville, Tennessee 37202
p. 615.741.2370
f. 615.741.1026
Karen.Stachowski@ag.tn.gov



Our Mission – We are the State’s law office serving Tennessee with principled, independent, and excellent counsel.

From: Lonnie McCloud <Lonnie.McCloud@tn.gov>
Sent: Friday, May 15, 2026 9:06 AM
To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; Brad Ulmer <Brad.Ulmer@tn.gov>; Jennifer Innes <Jennifer.Innes@tn.gov>
Cc: Rosalie Gunger <Rosalie.Gunger@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>
Subject: Re: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry

Karen,

TDEC has not approved a pilot study for ISHA. ISHA has only submitted a proposal of a study for feedback from TDEC Engineering Services Unit. TDEC is still awaiting submittal of the pilot study plans for approval. Attached is the water quality analysis submitted by ISHA for the proposed well. In the document, manganese levels were reported at 16mg/L. This is a very high number, as finished water from any water system must maintain 0.05mg/L. This standard must be met by manganese removal from source water.

Thanks,
Lonnie



Lonnie McCloud | Environmental Manager
TDEC Water Resources
Cookeville Environmental Field Office
1844 Foreman Drive
Suite 101
Cookeville, TN 38501

Office Number: (931)520-6688
Cell Number: (931)287-1033
Lonnie.McCloud@tn.gov
tn.gov/environment

Had a recent experience with TDEC? [Take our TDEC customer service survey.](#)

From: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Sent: Friday, May 15, 2026 8:47 AM
To: Brad Ulmer <Brad.Ulmer@tn.gov>; Jennifer Innes <Jennifer.Innes@tn.gov>
Cc: Rosalie Gunger <Rosalie.Gunger@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>;
Lonnie McCloud <Lonnie.McCloud@tn.gov>
Subject: RE: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry

Brad,

Thanks for getting back to me. The information you provided is what we were looking for. We heard there was a possible problem with manganese levels. Do you have any idea of when the pilot study on the removal of manganese will be completed?

Are there any documents regarding the concern over the manganese and the approval of a pilot study? It would be great if we could get copies of any such documents.

Thanks,
Karen

Karen H. Stachowski | Deputy Attorney General
Consumer Advocate Division
Office of Tennessee Attorney General

500 Dr. Martin L. King Jr. Blvd., Nashville, TN 37243

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p. 615.741.2370

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Karen.Stachowski@ag.tn.gov



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From: Brad Ulmer <Brad.Ulmer@tn.gov>

Sent: Thursday, May 14, 2026 9:56 PM

To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; Jennifer Innes <Jennifer.Innes@tn.gov>

Cc: Rosalie Gunger <Rosalie.Gunger@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>; Lonnie McCloud <Lonnie.McCloud@tn.gov>

Subject: RE: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry

Importance: High

Good evening Karen,

I hope you are doing well and having a great evening. Thank you for reaching out pertaining to ISHA Foundation. I consulted with my assistant manager over our Drinking Water Unit (Mr. Lonnie McCloud-copied) pertaining to your inquiry. After speaking with him, he was able to provide me with the following information.

TDEC is aware of Isha's proposed Water System. A PWSID number was assigned as a place holder for Isha's water system. Since no source approval has been granted, no information will appear in these fields as the water system cannot be established. The source water approval is still underway as the Division has concerns regarding high levels of manganese in the well water. Isha has proposed a pilot study of the well water to demonstrate effective manganese removal. The removal is achieved the Division will grant source water approval. The yield of the well is estimated at 748,000 GPD, this will become a limiting factor later on for Isha with their plans of further development.

Please do not hesitate to let us know if you have any additional questions.

Respectfully,

Brad



Brad Ulmer
Environmental Field Office Manager
TDEC Water Resources
Cookeville Environmental Field Office
1844 Foreman Drive, Suite 101
Cookeville, TN 38501

Office Number 931-520-6672
Cell Number 931-436-1030
Email: brad.ulmer@tn.gov

Had a recent experience with TDEC? [Take our TDEC customer service survey.](#)

From: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Sent: Monday, May 11, 2026 1:34 PM
To: Jennifer Innes <Jennifer.Innes@tn.gov>; Brad Ulmer <Brad.Ulmer@tn.gov>
Cc: Rosalie Gunger <Rosalie.Gunger@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>
Subject: RE: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry

Jennifer,

I appreciate the quick response. Also, thanks for the clarification and for including Brad on the email.

Have a wonderful week.

Karen

Karen H. Stachowski | Deputy Attorney General
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Karen.Stachowski@ag.tn.gov



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From: Jennifer Innes <Jennifer.Innes@tn.gov>
Sent: Monday, May 11, 2026 1:33 PM
To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; Brad Ulmer <Brad.Ulmer@tn.gov>
Cc: Rosalie Gunger <Rosalie.Gunger@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>
Subject: RE: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry

Hi Karen

Since Isha’s property is mostly Van Buren County, the Cookeville EFO has been handling all of their permitting including the portion in Sequatchie (so that they can have one main point of contact). I am copying Brad Ulmer, he will be able to answer your questions.

Thanks!

Jennifer

From: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Sent: Monday, May 11, 2026 2:26 PM
To: Jennifer Innes <Jennifer.Innes@tn.gov>
Cc: Rosalie Gunger <Rosalie.Gunger@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>
Subject: TPUC Docket No. 26-00034 Isha Foundation, Inc - water system inquiry

Jennifer,

I hope you are doing well. I am contacting you about a possible water system to be built in Sequatchie County, TN.

The TN Public Utility Commission has received a Petition for Declaratory Order from the Isha Foundation for a decision that its water system for its new development (not yet built) is not subject to TPUC’s jurisdiction.

The docket number is 24-00032. Link [Tennessee Public Utility Commission Electronic Docket Number 2600034](#)

I’ve checked the TDEC Dataveiwer, and it appears that TDEC has received an application for a SOP for the same development https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:34051:13356914699894:::34051:P34051_PERMIT_NUMBER:SOP-25004

I tried looking up a water system owned/operator by Isha (Drinking water Watch dashboard) but I only find one PWS ID number. Unfortunately, when I click on the system, the details of the system will not load onto my screen.

Water System Number TN0005252	System Name ISHA WATER SYSTEM	System Type					
Principal County Served	Point of Contact Type AC	Primary Source					
Show Water System Facilities Water System Details Show Points of Contact Information							
Water System No.	Water System Name	Principal County Served	Status	Federal Type	State Type	Primary Source	Active
TN0005252	ISHA WATER SYSTEM		A				13/AU
Annual Operating Periods & Pop. Served		Service Connections					
Source of Water		Service Areas					

I wanted to check with you to see if you are aware of this water system (which is to be served by wells)?

Are you aware of any concerns about the levels of magnesium in the proposed wells?

Also, are there any concerns about the quality or quantity of water from wells located on site?

Thanks,
Karen

Karen H. Stachowski | Deputy Attorney General
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Karen.Stachowski@ag.tn.gov



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Exhibit B

From: Mike Corley <mcorley@mtng.com>
Sent: Wednesday, May 13, 2026 2:17 PM
To: Ryan McGehee <Ryan.McGehee@ag.tn.gov>
Subject: Re: Isha Docket at the Tennessee Public Utility Commission

Thanks Ryan.
Mike Corley

From: Ryan McGehee <Ryan.McGehee@ag.tn.gov>
Sent: Wednesday, May 13, 2026 1:36 PM
To: Mike Corley <mcorley@mtng.com>
Subject: Isha Docket at the Tennessee Public Utility Commission

You don't often get email from ryan.mcgehee@ag.tn.gov. [Learn why this is important](#)

Hi Mike,

See link below for the filing by ISHA. Not much there, but I expect our petition to intervene in the near future.

Thanks,

Ryan
(615) 305-7252

[Tennessee Public Utility Commission Electronic Docket Number 2600034](#)