

Henry M. Walker
Partner
hwalker@bradley.com
615.252.2363 direct



July 31, 2026

Electronically Filed in TPUC Docket
Room on July 31, 2026 at 2:35 p.m.

Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Attn: Ectory Lawless

Docket No. 26-00034

Dear Ms. Lawless,

Please file in the above-captioned docket the attached supplemental response to question 1-57 of the Consumer Advocate's first round of discovery questions.

Thank you for your assistance.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Henry Walker". The signature is fluid and cursive, with the first and last names being clearly distinguishable.

Henry Walker (B.P.R. 000272)
Bradley Arant Boulton Cummings LLP
1221 Broadway, Suite 2400
Nashville, Tennessee 37203
Tel: (615) 252-2363
hwalker@bradley.com

cc: Shilina Brown
Ryan McGehee
Karen Stachowski

Enclosures

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

IN RE:

**PETITION OF ISHA FOUNDATION, INC.
FOR DECLARATORY JUDGMENT**

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DOCKET NO. 26-00034

**SUPPLEMENTAL RESPONSE TO CONSUMER ADVOCATE’S FIRST DISCOVERY
REQUEST TO ISHA FOUNDATION, INC.**

57. Admit or Deny that the proposed water source for ISHA Yogi Golf requires manganese removal to achieve and maintain a 0.05mg/L manganese level. If you deny this statement, provide the factual basis for doing so.

RESPONSE: See Response 17. Without waiving the objection, ISHA admits as to some wells on the site.

SUPPLEMENTAL RESPONSE: See attached letter from TDEC issued July 14, 2026, granting source approval for “Well #2.” That well can supply up to 108,000 GPD which will be used to supply immediate development needs. It is sufficient to provide the water needed for the Yogi Golf development along with other projects. That well contains a relatively small amount of manganese (0.235 mg/L) that can be readily treated to reduce the level to below 0.05mg/L. There is another, larger well on the property (“large well #12) that has a much higher level of manganese (16 mg/L) and will require more expensive treatment. The latter well is the one referred to by TDEC in Exhibit A of the Consumer Advocate’s responses to ISHA’s discovery requests.



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources

1221 South Willow Avenue
Cookeville, Tennessee 38506
Statewide 1-888-891-8332

Phone 931-520-6688

Fax 931-432-6952

July 14, 2026

Mr. Saran Subramanian
ISHA
951 Isha Lane
McMinnville, TN 37110

RE: Source Water Approval
ISHA School Water System
PWS#0005252
Sequatchie County

Dear Mr. Subramanian,

A site visit was made to Isha on June 30, 2026, in response to a request from ISHA for source approval of Well #2. A site evaluation form was completed during the visit; no problems were noted.

Regional Managers were contacted by the following Divisions: Water Resources, Underground Storage Tanks, and Solid Waste to discuss any known or potential impacts that would adversely affect raw water quality. No problems or concerns were identified.

Chemical analyses of all required parameters and radionuclide analyses were submitted to the Division on July 9, 2026, fulfilling the basic requirements for approval. Thank you for completing all necessary requirements in a timely manner.

If you have any questions or comments, please contact Lonnie McCloud at (931)520-6688, the Cookeville Environmental Field Office.

Sincerely,

Lonnie McCloud
Environmental Manager
Division of Water Resources
Cookeville Environmental Field Office

Cc: DWR Central Office
File