

TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
502 Deaderick Street, 4th Floor,
Nashville, TN, 37243-0001

October 2, 2026

Electronically Filed in TPUC Docket
Room on October 2, 2026 at 11:38 a.m.

Melvin Malone, Counsel
Butler Snow LLP
1320 Adams Street, Suite 1400
Nashville, Tennessee 37208

Via email: melvin.malone@butlersnow.com

RE: Docket No. 26-00036: Joint Application of Limestone Water Utility Operating Company, LLC and the City of Grand Junction, for Approval of the Acquisition of and to Operate the Saulsbury Distribution Water System, and to Transfer or Issue a Certificate of Public Convenience and Necessity

Dear Mr. Malone,

The Tennessee Public Utility Commission requires additional information to review the above-referenced *Joint Application*. Please provide a response to this information request as soon as possible, but no later than October 12, 2026.

1. In Docket 12-00157, the agency considered and approved the acquisition of the water systems in Whitwell, Tennessee and Powell's Crossroads, Tennessee ("the Municipal Systems"), by Tennessee American Water Company ("Tennessee-American"). As part of the 12-00157 Petition, Tennessee-American sought and received approval of franchise agreements with each of the Municipal Systems. The instant proceeding differs from 12-00157 in that the City of Grand Junction seeks to sell the system in another municipality, Saulsbury, Tennessee, and that there is no accompanying request for approval of a franchise with Saulsbury. In response to Question 4 of the Commission's July 2, 2026 Data Request, Limestone states that it "...has been informed by the seller of the Saulsbury system that since Grand Junction is the owner of the system, no approvals or permits are required from the City of Saulsbury to provide service within the municipal boundaries of the city." Clarify the response. Did the City of Grand Junction represent that Limestone does not need approvals or permits from Saulsbury to provide service, or was the City of Grand Junction referring to

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itself? Has Limestone had discussions with Saulsbury concerning a franchise agreement? Is it the position of Limestone that Saulsbury cannot require Limestone to have a franchise agreement? Please include the legal basis for your response.

2. Respond to Question 1 from the Commission's September 10, 2026 Data Request. The question sought information related to communications with Saulsbury, Tennessee. The attached response does not demonstrate Saulsbury's awareness of the sale. Rather, the response consists of information about the City of Grand Junction's intent to explore the sale of the Saulsbury Water System.
3. Provide a narrative discussing how the City of Grand Junction acquired the water system in Saulsbury. Provide supporting documentation to augment the narrative.
4. Please discuss whether approvals from the Tennessee Department of Environment and Conservation are required for the acquisition of the Saulsbury system. What approvals are required before Limestone can provide service to Saulsbury?
5. The July 1, 2024 meeting minutes of the Grand Junction Board of Aldermen show that a motion to pursue selling the Saulsbury water system was approved. Did the Board of Alderman take further action related to the sale of the Saulsbury water system? If so, provide documentation of the actions

If you have any questions or require additional assistance, please contact me at 615-770-6894 or via email at jerry.kettles@tn.gov. Please respond by sending the original and four (4) copies along with an electronic file to:

Ms. Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Email: TPUC.DocketRoom@tn.gov

Sincerely,



Jerry Kettles, Senior Policy Advisor

C: Russ Mitten, Mayor Curtis Lane