

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**NASHVILLE, TENNESSEE**

**May 29, 2026**

**IN RE:**

**JOINT APPLICATION FO 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**

**DOCKET NO.  
26-00036**

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**ORDER GRANTING THE PETITION TO INTERVENE  
FILED BY THE CONSUMER ADVOCATE**

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This matter is before the Administrative Judge of the Tennessee Public Utility Commission (“Commission” or “TPUC”) to consider the *Petition to Intervene* filed by the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”) on May 22, 2026.

**RELEVANT BACKGROUND**

On April 23, 2026, Limestone Water Utility Operating Company, LLC (“Limestone”) and the City of Grand Junction (“Grand Junction”) (collectively, “Joint Applicants”) filed the *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* (“*Joint Application*”). The Joint Applicants seek approval of their Agreement for Sale of Utility System concerning the Saulsbury Distribution Water System (“System”) to Central States Water Resources, Inc. (“Central States”), the parent company of Limestone, and for Limestone to be issued a Certificate of Public Convenience and Necessity (“CCN”) to own and operate the System.<sup>1</sup> The *Joint Application* asserts that CSWR,

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<sup>1</sup> *Joint Application* (April 23, 2026).

LLC (“CSWR”), one of Limestone’s affiliates, provides financial, technical, and managerial expertise and services, and will manage the System if the Commission approves the transaction.<sup>2</sup>

**CONSUMER ADVOCATE’S *PETITION TO INTERVENE***

On May 22, 2026, the Consumer Advocate filed a *Petition to Intervene* seeking to intervene in the docket in accordance with Tenn. Code Ann. § 65-4-118, which qualifies the Consumer Advocate to represent the interests of Tennessee consumers of public utility services in proceedings before the Commission. The Consumer Advocate asserts that:

The interests of consumers in transferring authority to provide water services from Grand Junction to Central States, CSWR, and Limestone may be affected by determinations and orders made by the Commission with respect to its interpretation, application, and implementation of Tenn. Code Ann. § 65-4-113 and other relevant statutory and regulatory provisions. Such interests include, but are not limited to, clarification of the system or systems that are the subject of the Agreement; the affiliate relationship of Limestone, its affiliate company CWSR and its ultimate parent, Central States; the cost and benefits to consumers which may be gained from the transfer; the impact of Limestone’s improvements and capital investments on the rates of customers; and the assessment of the suitability, financial responsibility, and technical capability of both Limestone and CSWR to operate the wastewater system.<sup>3</sup>

As such, the Consumer Advocate seeks to intervene in these proceedings to represent the interests of Tennessee consumers. Neither Limestone nor Grand Junction filed any opposition to the Consumer Advocate’s intervention in these proceedings.

**FINDINGS & CONCLUSIONS**

Tenn. Code Ann. § 4-5-310 establishes the following criteria for granting petitions to intervene:

- (a) The administrative judge or hearing officer shall grant one (1) or more petitions for intervention if:

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<sup>2</sup> *Id.* at 6.

<sup>3</sup> *Petition to Intervene*, p. 3 (May 22, 2026).

- (1) The petition is submitted in writing to the administrative judge or hearing officer, with copies mailed to all parties named in the notice of the hearing, at least seven (7) days before the hearing;
  - (2) The petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities or other legal interest may be determined in the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and
  - (3) The administrative judge or hearing officer determines that the interests of justice and the orderly and prompt conduct of the proceedings shall not be impaired by allowing the intervention.
- (b) The agency may grant one (1) or more petitions for intervention at any time, upon determining that the intervention sought is in the interests of justice and shall not impair the orderly and prompt conduct of the proceedings.<sup>4</sup>

Although it is not an automatic or absolute right to participate in proceedings before the Commission, Tenn. Code Ann. § 65-4-118(b)(1) provides a general basis for the qualification of the Consumer Advocate to be permitted to intervene as a party to represent the interests of Tennessee public utility consumers. It provides as follows:

The consumer advocate division has the duty and authority to represent the interests of Tennessee consumers of public utilities services. The division may, with the approval of the attorney general and reporter, participate or intervene as a party in any matter or proceeding before the commission or any other administrative, legislative or judicial body and initiate such proceeding, in accordance with the Uniform Administrative Procedures Act, compiled in title 4, chapter 5, and the rules of the commission.<sup>5</sup>

In this docket, Limestone and Grand Junction seek authority to transfer its utility system providing utility service to customers served by the Saulsbury Utility System to Limestone upon the closing of a proposed sale of the Grand Junction Saulsbury Utility System property, operations, and service area. The closing of the proposed transaction is contingent upon Commission approval of the transaction and the issuance of a CCN to Limestone to provide utility service. Granting the *Joint*

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<sup>4</sup> Tenn. Code Ann. § 4-5-310.

<sup>5</sup> Tenn. Code Ann. § 65-4-118(b)(1).

*Application* will result in a change of service provider for the customers of the System. In addition, Limestone states that it will adopt the rules and base rates currently in effect for the System. For the foregoing reasons, the Administrative Judge finds that there is sufficient factual basis to find that legal rights or interests held by those consumers may be determined in this proceeding.

Therefore, upon due consideration, the Administrative Judge concludes that the legal rights, duties, privileges, immunities, or other legal interest of Grand Junction's Saulsbury Utility System's Tennessee customers may be determined in this proceeding. Further, the Administrative Judge finds that the Consumer Advocate qualifies under law as an intervenor for the purpose of representing those consumer interests, there is no objection to its intervention, and its *Petition to Intervene* was timely filed. Further, the Consumer Advocate's participation should not impair the interests of justice or the orderly and prompt conduct of the proceedings. For these reasons, the Administrative Judge concludes that the Consumer Advocate's *Petition to Intervene* should be granted.

**IT IS THEREFORE ORDERED THAT:**

The *Petition to Intervene* filed by the Consumer Advocate Division of the Office of the Tennessee Attorney General is granted. The Consumer Advocate Division of the Office of the Tennessee Attorney General may intervene and participate as a party in this proceeding and, as such, shall receive copies of any notices, orders, or other documents filed herein.

  
Aaron J. Conklin, Administrative Judge