

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

Electronically Filed in TPUC Docket  
Room on June 4, 2026 at 2:45 p.m.

**IN RE:** )  
)  
**JOINT APPLICATION OF LIMESTONE** )  
**WATER UTILITY OPERATING** )  
**COMPANY, LLC AND THE CITY OF** )  
**GRAND JUNCTION, FOR APPROVAL** ) **DOCKET NO. 26-00036**  
**OF THE ACQUISITION OF AND TO** )  
**OPERATE THE SAULSBURY** )  
**DISTRIBUTION WATER SYSTEM,** )  
**AND TO TRANSFER OR ISSUE A** )  
**CERTIFICATE OF PUBLIC** )  
**CONVENIENCE AND NECESSITY** )

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**CONSUMER ADVOCATE’S MOTION FOR ENTRY  
OF A PROCEDURAL SCHEDULE**

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The Consumer Advocate Division (“Consumer Advocate”) of the Office of the Tennessee Attorney General and respectfully submits the following Proposed Procedural Schedule in this TPUC Docket No. 26-00036 to address 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* (“Petition”).

The Consumer Advocate and Limestone Water Utility Operating Company, LLC (“Limestone”) discussed a procedural schedule, but could not come to an agreement upon on the proposed hearing date. Limestone prefers a hearing for this matter at the Commission’s scheduled conference on September 14, 2026. The Consumer Advocate has proposed a hearing date for November 2, 2026, which is the Commission’s next scheduled conference after the September meeting.

The Consumer Advocate has proposed the following schedule that takes into account the Consumer Advocate’s finite resources and the requirements of other dockets, including several with statutory deadlines.

<b>Due Date/Deadline</b>	<b>Filing/Activity</b>
June 18, 2026	CAD’s 1st Discovery Requests to Limestone
July 9, 2026	Limestone’s Response to CAD’s 1st Discovery Requests
July 16, 2026	CAD’s 2nd Discovery Requests to Limestone
July 30, 2026	Limestone’s Response to CAD’s 2 <sup>nd</sup> Discovery Requests
August 28, 2026	CAD’s Pre-Filed Testimony
September 18, 2026	Limestone’s Pre-Filed Rebuttal Testimony
October 12, 2026	Settlement Deadline
October 16, 2026	Pre-Hearing Motions
October 22, 2026	Pre-Hearing Telephone Status Conference
November 2, 2026	Target Hearing Date

- Nothing herein restricts the Parties from voluntarily participating in additional informal discovery.
- Copies of all discovery exchanged between the Parties shall be filed with TPUC within 3 business days of the exchange of information.
- For all spreadsheets, a copy shall be submitted in Excel format with working formulas intact. This includes spreadsheets that are exhibits to Pre-Filed Testimony.
- Rebuttal Testimony is limited only to issues raised in the Intervenor’s Direct Testimony and should include the page and line number of the Intervenor’s testimony that is being rebutted.

For cause, the Consumer Advocate would submit there are factors weighing toward allowing the Consumer Advocate and the residents of City of Saulsbury the time necessary to investigate and assess this proposed transaction.

First, there is no indication the local government or residents in the City of Saulsbury have been provided with any notice of the transaction. Although the Petition indicates a transaction agreement between the City of Grand Junction and Limestone was signed nearly two years ago<sup>1</sup>, local officials in the City of Saulsbury were not aware about the proposed transaction when contacted by the Consumer Advocate. Based on the Consumer Advocate’s initial review and discussions with residents, the City of Saulsbury has one hundred and twelve (112) residents, many of whom are unemployed or retired. The community is in a rural area and faces economic challenges. Based on the results of Limestone’s rate case in TPUC Docket No. 24-00044, the water rates of the residents of the City of Saulsbury may eventually be subject to significant rate increases. As such, the residents of the City of Saulsbury would expect a developed record underlying the Commission’s ultimate decision in this matter.

Second, there appears to be confusion regarding the water system at issue. All water systems in Tennessee have unique identifying numbers assigned to them by the Tennessee Department of Environment and Conservation (“TDEC”). In the Petition, Limestone identified the water system at issue as having the Public Water System Identification (“PWSID”) number of 0000657. However, this PWSID number belongs to Newport Report Water System. After being contacted by the Consumer Advocate, Limestone filed a correction in the Docket stating the correct PWSID number was 0000610.<sup>2</sup> However, the new PWSID number provided by Limestone is for an inactivated drinking water system.<sup>3</sup> Since 2002, the Grand Junction Water Department has been serving Saulsbury, and its PWSID number is 0000267.

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<sup>1</sup> Petition, p. 6; Exhibit 10.

<sup>2</sup> *Filing of Substitute page 19 to Petition*, TPUC Docket No. 26-00036 (May 20, 2026).

<sup>3</sup> The Saulsbury Utility District was inactivated in 2002. Since 2002, The City of Grand Junction has been providing service to Saulsbury.

Third, a November 2026 target date allows the Consumer Advocate the time and availability to assess the Petition while balancing the needs of several other dockets with statutory deadlines. This docket does not have a statutory deadline. The transaction agreement was signed on July 19, 2024, nearly two years ago.<sup>4</sup> Given the Company's lack of urgency in seeking approval of the transaction, a hearing at the Commission's scheduled November conference is not prejudicial to the Company whereas rushing a hearing would be prejudicial to the households of the City of Saulsbury.

While the Consumer Advocate and Limestone could continue to work out individual dates, the parties do not agree on the target hearing date. At a minimum, the Consumer Advocate respectfully requests the Administrative Judge to set a target hearing date no earlier than November 2, 2026. This motion is being submitted in writing to provide a clear record and give the Administrative Judge the rationale for the Consumer Advocate's request prior to a soon-to-be scheduled status conference requested by the parties. The Consumer Advocate does not anticipate a written response within seven days to be made to this motion.



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**RYAN MCGEHEE** (BPR No. 025559)  
Assistant Attorney General  
**SHILINA BROWN** (BPR No. 020689)  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Telephone: (615) 360-4219  
Email: [ryan.mcgehee@ag.tn.gov](mailto:ryan.mcgehee@ag.tn.gov)  
Email: [shilina.brown@ag.tn.gov](mailto:shilina.brown@ag.tn.gov)

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<sup>4</sup> Petition, p. 6; Exhibit 10.

**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, upon:

Melvin Malone, Esq.  
Butler Snow LLP  
Neuhoff Building  
1320 Adams Street, Suite 1400  
Nashville, TN 37208  
(615) 651-6700  
[Melvin.Malone@butlersnow.com](mailto:Melvin.Malone@butlersnow.com)

This 4<sup>th</sup> day of June 2026.



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**RYAN McGEHEE**  
Assistant Attorney General