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June 9, 2026

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on June 9, 2026 at 11:06 a.m.

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

RE: *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, TPUC Docket No. 26-00036*

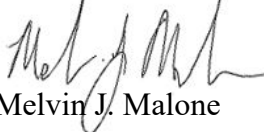
Dear Chairman Jones:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Response to the Consumer Advocate's Motion for Entry of a Procedural Schedule* in the above-captioned matter.

As required, copies will be mailed to your office. Should you have any questions concerning this filing or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachment

cc: Timothy Atwood, Central States Water Resources
Russ Mitten, Central States Water Resources
Mayor Curtis Lane, City of Grand Junction
Ryan McGehee, Consumer Advocate Division
Shilina B. Brown, Consumer Advocate Division

*Neuhoff Building
1320 Adams Street, Suite 1400
Nashville, TN 37208*

MELVIN J. MALONE
615.651.6705
C 615.948.7801
melvin.malone@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

BUTLER SNOW LLP

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

**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)**

DOCKET NO. 26-00036

**LIMESTONE WATER UTILITY OPERATING COMPANY, LLC’S
RESPONSE TO THE CONSUMER ADVOCATE’S MOTION FOR ENTRY
OF A PROCEDURAL SCHEDULE**

Pursuant to Rule 1220-01-02-.06 of the Tennessee Public Utility Commission (“TPUC” or “Commission”), Limestone Water Utility Operating Company, LLC (“Limestone”) respectfully submits its *Response to the Consumer Advocate’s Motion for Entry of a Procedural Schedule*. For the reasons that follow and for good cause shown, Limestone respectfully requests the Commission to enter a procedural schedule with a target hearing date consistent with Commission Rule 1220-04-14-.08(1).

I.

BACKGROUND

On April 24, 2026, Limestone and The City of Grand Junction, Tennessee (“City” or “Grand Junction”) submitted 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 (the “Joint Application”) in the above-captioned case. The Consumer

Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate” or “CAD”) filed a petition to intervene on May 22, 2026, which petition was granted by the Commission on May 29, 2026. Thereafter, Limestone and the Consumer Advocate began cooperative, good faith discussions in attempt to agree upon a Joint Proposed Procedural Schedule. During these discussions, Limestone proposed a Target Hearing Date of September 14, 2026,¹ and the CAD proposed a Target Hearing Date of November 2, 2026. According to the Commission’s Notice of Commission Conference Dates (June to December 2026), the Commission does not presently anticipate scheduling a Conference in October 2026.

II.

DISCUSSION AND ARGUMENTS

The *Joint Application* was filed with the Commission and served upon the Consumer Advocate about six (6) weeks ago on April 24, 2026. The Consumer Advocate makes several allegations in its motion. It is premature at this stage of this case to engage in substantive arguments relative to the merits of the *Joint Application*. The Joint Applicants only objective here is to avoid further unnecessary delay and to request that the Commission establish a procedural schedule consistent with its rules.

Limestone is not attempting to truncate or short-cut the regulatory process. The draft procedural schedule submitted by Limestone is reasonable and consistent with Commission practice. Under the schedule initially proposed by Limestone, this process would conclude in approximately five to six months, including deliberations. Under the CAD’s proposed schedule, the regulatory process and review could take up to eight months. The CAD’s proposal is not only

¹ The draft Joint Proposed Procedural Schedule that Limestone submitted to the CAD is attached hereto as **Exhibit A**. The responsive Joint Proposed Procedural Schedule that the CAD submitted to Limestone is reflected in the CAD’s motion.

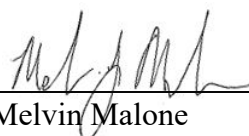
unnecessarily lengthy, but it is also inconsistent with Commission Rule 1220-04-14-.08(1).² Finally, while not dispositive, it is noteworthy that the schedule proposed here by the Consumer Advocate is longer than the schedule adopted by the Commission in TPUC Docket No. 25-00074, *In Re: Application of Piedmont Natural Gas Company, Inc. and Spire Tennessee, Inc. for Approval of a Transfer of Authority to Provide Utility Services Pursuant to Tenn. Code Ann. § 65-4-113 and Related Authorizations.*

III.

CONCLUSION

For the foregoing reasons, Limestone respectfully requests that the Consumer Advocate's motion be denied and that the Commission enter a procedural schedule with a Target Hearing Date consistent with Commission rules.

Respectfully submitted,



Melvin Malone
Jonathan Allen
Butler Snow LLP
Neuhoff Building
1320 Adams Street, Suite 1400
Nashville, TN 37208
Phone: (615) 651-6700
Melvin.Malone@butlersnow.com
Jonathan.Allen@butlersnow.com

*Attorneys for Limestone Water Utility
Operating Company, LLC*

² Commission Rule 1220-04-14-.08(1) provides that “The Commission shall approve or deny an application for acquisition within 120 days of the filing of a complete application by the acquiring utility.”

EXHIBIT A

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

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)

DOCKET NO. 26-00036

PARTIES' JOINT PROPOSED PROCEDURAL SCHEDULE

Jointly comes the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”) and Limestone Water Utility Operating Company, LLC (“Limestone”) and respectfully submit the following agreed upon Joint Proposed Procedural Schedule in this TPUC Docket No. 26-00036 pursuant to instructions by the Hearing Officer.

Due Date	Filing / Activity
June 4, 2026	Intervenors’ First Discovery Request
June 16, 2026	Limestone’s Responses to First Discovery Request
June 23, 2026	Intervenors’ Second Discovery Request
July 2, 2026	Limestone’s Responses to Second Discovery Request
July 16, 2026	Intervenors’ Pre-Filed Testimony
August 6, 2026	Limestone’s Rebuttal Testimony
August 21, 2026	Deadline for Filing Settlement Agreement
August 27, 2026	Pre-Hearing Motions
September 3, 2026	Pre-Hearing Telephone Status Conference
September 14, 2026	Target Hearing Date

- All filings shall be filed in the TPUC docket room by 2:00 p.m. (Central Time) on the date due.
- Nothing herein restricts the parties from participating in additional informal discovery.

- Copies of all discovery exchanged between the parties shall be filed with TPUC within three business days of the exchange of information. All spreadsheets shall be filed in Excel format with working formulas intact.
- Any Pre-filed Testimony should include all supporting worksheets in Excel format with working formulas intact.
- Rebuttal Testimony should be limited only to issues raised in the Intervenors' Direct Testimony and should include the page and line number of the Intervenors' testimony that is being rebutted.

JOINTLY SUBMITTED FOR ENTRY:

BY: _____

MELVIN J. MALONE
JONATHAN ALLEN
Butler Snow LLP
Neuhoff Building
1320 Adams Street, Suite 1400
Nashville, TN 37208
(615) 651-6700
Melvin.Malone@butlersnow.com
Jonathan.Allen@butlersnow.com

*Attorneys for Limestone Water Utility Operating
Company, LLC*

BY: _____

RYAN McGEHEE
Assistant Attorney General
SHILINA B. BROWN
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
(615) 741-8733
ryan.mcgehee@ag.tn.gov
shilina.brown@ag.tn.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

City of Grand Junction
Attn: Mayor Curtis Lane
150 Tippah Street
Grand Junction, TN 38039
grandjunction@bellsouth.net

Ryan McGehee, Esq.
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
ryan.mcgehee@ag.tn.gov

Shilina B. Brown, Esq.
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
shilina.brown@ag.tn.gov

This the 9th day of June 2026.



Melvin J. Malone