

July 13, 2026

VIA ELECTRONIC FILING

Jerry Kettles
Director of Economic Analysis
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
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Electronically Filed in TPUC Docket
Room on July 13, 2026 at 2:00 p.m.

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 Mr. Kettles:

We are in receipt of your data requests to Limestone Water Utility Operating Company, LLC (“Limestone”), dated July 2, 2026. Please find Limestone’s responses below.

1. *The Joint Application makes several references to Grand Junction’s Certificate of Convenience and Necessity (“CCN”). Grand Junction is a municipality and does not have a CCN issued by the Commission. Please clarify.*

Response: Applicants clarify that Grand Junction is a municipality and does not hold a Certificate of Convenience and Necessity issued by the Commission. Any references in the Joint Application to Grand Junction’s CCN, or to the transfer of Grand Junction’s CCN to Limestone, were inadvertent.

Applicants are requesting that the Commission approve Limestone’s acquisition of the Saulsbury water system assets and grant Limestone a Certificate of Convenience and Necessity, with its accompanying privilege and franchise, to provide water utility service to the customers currently served by Grand Junction’s Saulsbury Utility System.

2. *Under what authority does Grand Junction provide water service to the City of Saulsbury? Does the City of Grand Junction have a franchise agreement to furnish water service to the City of Saulsbury? If so, please provide a copy of the franchise agreement.*

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Response: Limestone Water has been informed by the seller of the Saulsbury system that Grand Junction does not have a franchise agreement with the City of Saulsbury.

3. *Are all meter or customer locations acquired within the city limits of the City of Saulsbury?*

Response: Limestone Water has been informed by the seller of the Saulsbury system that, out of the 166 total, only 3 meter or customer locations included in the proposed acquisition are outside of the city limits of the City of Saulsbury.

4. *What approvals or permits are needed from the City of Saulsbury to provide service within the municipal boundaries of the city? Provide an update on the progress of such approvals or permits. Are approvals or permits required from Hardeman County to provide service to any acquired customer locations?*

Response: Limestone 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. Additionally, Limestone has been informed by the seller that approvals or permits are not required from Hardeman County to provide service to any acquired customer locations.

5. *Will Limestone purchase finished water from the City of Grand Junction to serve Saulsbury customers? Are the rates in Limestone's proposed tariff (Exhibit 17) the same as those in Grand Junction's 2025 Annual Report?*

Response: Yes, Limestone will purchase water from the City of Grand Junction to serve the customers of the Saulsbury system. The rates contained in Limestone's proposed tariff are the current rates charged by the City of Grand Junction to the customers of the Saulsbury system.

As required, copies will follow. Please feel free to reach out to me if you have any further questions.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

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