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September 8, 2026

Electronically Filed in TPUC Docket
Room on September 8, 2026 at 4:19 p.m.

VIA ELECTRONIC FILING

Hon. Herbert H. Hilliard, Chairman
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*

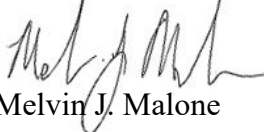
Dear Chairman Hilliard:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Supplemental Responses to Consumer Advocate's First Set of Discovery Request Nos. 1-8 and 1-9* in the above-captioned matter.

As required, copies will follow. 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: Eric Rocchio, 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

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BUTLER SNOW LLP

**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
SUPPLEMENTAL RESPONSES TO CONSUMER ADVOCATE’S FIRST SET OF
DISCOVERY REQUEST NOS. 1-8 AND 1-9**

Limestone Water Utility Operating Company, LLC (“Limestone” or “Company”), by and through counsel, hereby submits its Supplemental Responses to the First Set of Discovery Request Nos. 1-8 and 1-9 propounded by the Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate” or “CAD”).

GENERAL OBJECTIONS

1. Limestone objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.

2. Limestone objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission (“TPUC”).

3. The specific responses set forth below are based on information now available to Limestone, and Limestone reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. Limestone objects to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. Limestone objects to each request to the extent it seeks information outside Limestone's custody or control.

6. Limestone's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of Limestone's General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. Limestone objects to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.

8. Limestone objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. Limestone does not waive any previously submitted objections to the Consumer Advocate's discovery requests.

**SUPPLEMENTAL RESPONSES TO
FIRST SET OF DISCOVERY REQUEST NOS. 1-8 AND 1-9**

- 1-8.** Financial and Managerial Capabilities. Refer to the Direct Testimony of Jacob Freeman, pp. 41-42, TPUC Docket No. 24-00044 (July 16, 2024). Provide the status and projected completion date of the construction of the Candlewood Lakes Redundant Well described in Mr. Freeman’s referenced testimony.

RESPONSE: Limestone objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this acquisition proceeding. Specifically, the referenced testimony concerns the Candlewood Lakes system and improvements discussed in a separate, prior proceeding, and the status of that project is not directly relevant to the Commission’s consideration of the proposed acquisition of the Saulsbury distribution water system in this docket. Limestone further objects to this Request to the extent it seeks information outside the scope of the Joint Application and the issues properly presented in this proceeding.

Subject to and without waiving the objection, Limestone has completed the drilling of the well. Startup activities are currently scheduled for mid-August 2026. The Company anticipates that all project closeout documentation will be finalized and that the well will be placed into service by the end of October 2026.

SUPPLEMENTAL RESPONSE: Final startup and equipment turnover will occur following completion of a Groundwater Under the Direct Influence of Surface Water (“GWUDI”) test to confirm that the well is not influenced by surface water. The GWUDI test is required by the Tennessee Department of Environment and Conservation (“TDEC”) as a condition of the construction permit and must be performed under specified weather conditions. The initial startup, eight-hour pump test, and bacteriological sampling have been completed,

with no issues identified. The well is physically connected to the system; however, the associated valves will remain closed, and the well will not discharge into the system until final approval is received from TDEC.

- 1-9. Financial and Managerial Capabilities.** Refer to the Direct Testimony of Todd Thomas, pp. 140-141, TPUC Docket No. 24-00044 (July 16, 2024). Provide the status and projected completion date of the installation of a “reasonably priced generator” discussed in Mr. Todd Thomas’s referenced testimony.

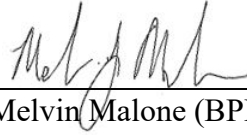
RESPONSE: Limestone objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this acquisition proceeding. Specifically, the referenced testimony concerns the Candlewood Lakes system and improvements discussed in a separate prior proceeding, and the status of the generator installation is not directly relevant to the Commission’s consideration of the proposed acquisition of the Saulsbury distribution water system in this docket. Limestone further objects to this Request to the extent it seeks information outside the scope of the Joint Application and the issues properly presented in this proceeding.

Subject to and without waiving the objection, Limestone has scheduled the installation of the generator to occur during the first week of August 2026.

SUPPLEMENTAL RESPONSE: Because final startup will occur following completion of the GWUDI test, the generator has not yet been installed. The generator is expected to be installed before final startup in preparation for equipment turnover. The project includes multiple deliverables with different completion timelines; therefore, the anticipated startup date is based on the deliverable with the longest lead time, which is completion of the well

following receipt of the GWUDI test results. Subject to the weather conditions necessary to perform the GWUDI test, final startup and equipment turnover are currently anticipated to occur no later than October 30, 2026.

Respectfully submitted,



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Operating Company, LLC*

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

**JOINT APPLICATION OF LIMESTONE)
WATER UTILITY OPERATING)
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OF THE ACQUISITION OF AND TO)
OPERATE THE SAULSBURY)
DISTRIBUTION WATER SYSTEM, AND)
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CONVENIENCE AND NECESSITY)**

DOCKET NO. 26-00036

VERIFICATION

STATE OF MISSOURI)

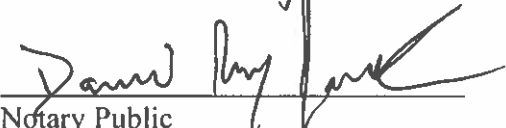
COUNTY OF ST. LOUIS)

I, AARON SILAS, being duly sworn, state that I am authorized to testify on behalf of Limestone Water Utility Operating Company, LLC, in the above-referenced docket, that if present before the Commission and duly sworn, verifies that the data requests and discovery responses are accurate to the best of my knowledge.



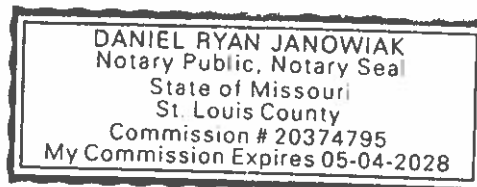
AARON SILAS

Sworn to and subscribed before me
this 24th day of August, 2026.



Notary Public

My Commission expires: 5/4/28



CERTIFICATE OF SERVICE

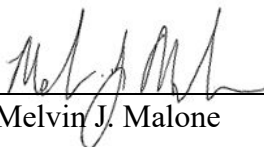
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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

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This the 8th day of September 2026.



Melvin J. Malone