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September 9, 2026

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket Room
on September 9, 2026 at 12:20 p.m.

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*

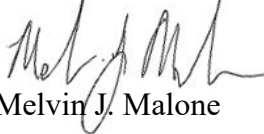
Dear Chairman Hilliard:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Supplemental Responses to Consumer Advocate's Second Set of Discovery Request Nos. 2-10 and 2-11* 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 SECOND SET OF
DISCOVERY REQUEST NOS. 2-10 AND 2-11**

Limestone Water Utility Operating Company, LLC (“Limestone” or “Company”), by and through counsel, hereby submits its Supplemental Responses to the Second Set of Discovery Request Nos. 2-10 and 2-11 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
SECOND SET OF DISCOVERY REQUEST NOS. 2-10 AND 2-11

2-10. Transaction/ Asset Value. Is Limestone aware of any plans for commercial customers that may move into or build within the Saulsbury system service area? If so, identify the names of the commercial customers.

RESPONSE: Limestone has requested this information from the seller and will supplement its response if and when the information becomes available. At this time, based on the information currently available to Limestone, the Company is not aware of any planned commercial development within the Saulsbury system service area.

SUPPLEMENTAL RESPONSE: Please see Joint Application, Appendix A, II (2)(e)(9). Limestone has not obtained any information different from that set forth in the Joint Application.

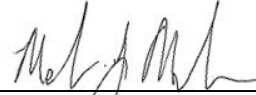
2-11. Transaction/ Asset Value. Is Limestone aware of any planned residential development that may be built in the Saulsbury system service area? If so, identify the developer and the residential development.

RESPONSE: Limestone has requested this information from the seller and will supplement its response if and when the information becomes available. At this time, based on the information currently available to Limestone, the Company is not aware of any planned residential development within the Saulsbury system service area.

SUPPLEMENTAL RESPONSE: Please see Joint Application, Appendix A, II (2)(e)(9).

Limestone has not obtained any information different from that set forth in the Joint Application.

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)
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DOCKET NO. 26-00036

VERIFICATION

STATE OF MISSOURI)

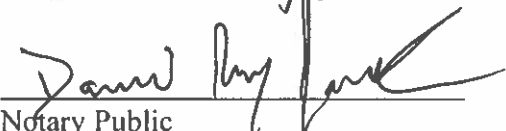
COUNTY OF ST. LOUIS)

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.



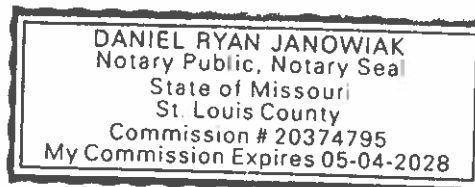
AARON SILAS

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



Notary Public

My Commission expires: 5/4/28



CERTIFICATE OF SERVICE

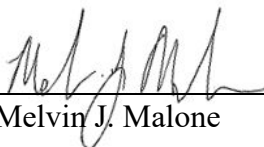
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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

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This the 9th day of September 2026.



Melvin J. Malone