

Electronically Filed in TPUC Docket
Room on August 26, 2026 at 2:18 p.m.

From: [Mark Weber](#)
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Cc: Carlos.Black@tn.gov; ConsumerComplaint.TPUC@tn.gov; Stacy.Balthrop@tn.gov; Kelly.Grams@tn.gov; Jimmie.Hughes@tn.gov; [Karen H. Stachowski](mailto:Karen.H.Stachowski); [Rosalie Gunger](mailto:Rosalie.Gunger); TNConsumerAdvocate
Subject: Re: TPUC File No. 26-0293 - [REDACTED]
Date: Wednesday, August 26, 2026 12:35:31 PM

Ms. Fox,

Thank you for confirming that Limestone's tariff does not state that a property must be an owner's "full-time residence" to qualify for Residential Service and that the applicable tariff standard is the property's "primary use."

I need to correct two important factual and procedural points in your response.

First, in its July 8, 2026 email, Limestone stated that it had reviewed the property and concluded that it was a lakefront rental property. Limestone then stated that rental properties are considered commercial and that I would have to provide proof that the property was my "full-time residence and not a rental property" to qualify for residential status. Limestone repeated that full-time-residence requirement in its July 23, 2026 email sent at 5:15 a.m.

Your latest response now acknowledges that the tariff does not require a property to be the owner's full-time residence. That is a material change from the basis Limestone originally provided for its classification.

Second, Limestone did not know about the approximately four-month blocked period when it originally classified the property as commercial. I first provided that information to Limestone in my reply sent on July 23, 2026, at 9:23 p.m.—after Limestone's July 8 classification decision and after Limestone repeated its full-time-residence requirement earlier on July 23.

Consequently, the four-month blocked period could not have been part of the information Limestone relied upon when it originally classified the property as commercial.

The four-month period also does not represent the total amount of time my wife, my family, and I occupy the house. It represents only the period during which the house is guaranteed to be unavailable for rental. We use the house personally during other parts of the year when its rental calendar remains open.

For example, my wife, members of our extended family, and I have occupied the house for almost the entire month of August 2026. August was not blocked on the rental calendar, but the house did not rent and was instead used as our personal dwelling. Rental activity generally occurs during limited periods when children are out of school and vacation demand is highest. During much of the remainder of the year, we personally use the house. If a booking occurs while we are staying there, we temporarily leave for the rental period and return afterward.

I can provide VRBO records establishing the dates on which the property was actually rented. Days when the property was merely available for rental cannot reasonably be treated as days when it was actually rented. Availability is not actual use.

Please provide the following clarification:

1. What information Limestone relied upon when it originally classified the property as commercial on or before July 8, 2026.
2. Whether the original decision was based on Limestone's previously stated "full-time residence" requirement.
3. When Limestone first adopted its current position that the property's primary use should be determined by comparing four blocked months with the remainder of the calendar year.
4. What tariff provision or Commission-approved authority permits rental availability, rather than actual use, to control the primary-use determination.
5. The period of time and actual rental records Limestone used in making its determination.
6. How Limestone accounted for personal and family occupancy during months when the calendar was open but the property was not rented.

Based on these clarified facts—and Limestone's confirmation that the property need not be my full-time or primary residence—I respectfully request that Limestone reconsider its determination and reclassify the property as Residential Service under the tariff's "primary use" standard.

Please let me know if Limestone requires any specific additional documentation to complete this reconsideration.

Sincerely,

Mark A. Weber, P.E.

