

Electronically Filed in TPUC Docket
Room on October 16, 2026 at 4:40 p.m.

From: Stone Brook Inn [REDACTED]
Sent: Friday, October 16, 2026 1:28 PM
To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Subject: Fw: Formal Rebuttal – Unsupported Guest-Capacity Assumptions, Reliance on Third-Party Booking Listings, and Request for Independent Review

Our reply for the response.

Jay

----- Forwarded Message -----

From: Stone Brook Inn [REDACTED]
To: Aaron Silas <asilas@cswwgroup.com>
Cc: Melvin Malone <melvin.malone@butlersnow.com>; Cari Wymer <cari.wymer@butlersnow.com>; John Dollarhide <john.dollarhide@butlersnow.com>; Russ Mitten <rmitten@cswwgroup.com>; Michelle Mairs <michelle.mairs@tn.gov>; Kelly Grams <kelly.grams@tn.gov>; stacy.balithrop@tn.gov <stacy.balithrop@tn.gov>
Sent: Friday, October 16, 2026 at 09:29:02 AM CDT
Subject: Re: Formal Rebuttal – Unsupported Guest-Capacity Assumptions, Reliance on Third-Party Booking Listings, and Request for Independent Review

Dear Mr. Silas,

As mentioned in our email,

"2. Third-party booking websites are not conclusive evidence of Stone Brook Inn's actual capacity".

So, please reconsider this appropriately from June 2025.

Regards,

J Patel
 Manager
 Stone Brook Inn

On Friday, October 16, 2026 at 09:07:10 AM CDT, Aaron Silas <asilas@cswwgroup.com> wrote:

Mr. Patel,

In reviewing your links, it does appear that the information regarding how many guests each room sleeps has been updated. The below screenshot is from yesterday and shows that each room sleep 3+ individuals. With this information updated on the various sites, I am able to update your ERU assignment per the day this information was updated on the various sites.

As such, your ERU assignment will be re-evaluated per the day this information was updated. I will reach out shortly with your formal reassignment.

Thanks!

City, hotel name, or address
Stone Brook Inn

Dates
Fri, Oct 16 - Wed, Oct 21

Travelers
2 travelers, 1 room

Search



Luxury Room, 1 King Bed, Non Smoking
200 sq ft
1 bedroom
Sleeps 3
1 King Bed
[More details](#)

View prices



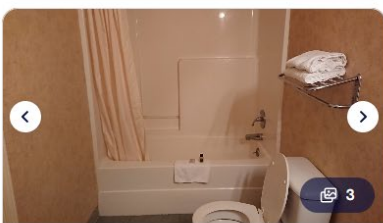
Double Room, 2 Double Beds, Smoking
1 bedroom
Sleeps 4
2 Double Beds
[More details](#)

Office on the web Frame
View prices



Double Room, 2 Double Beds, Non Smoking
1 bedroom
Sleeps 4
2 Double Beds
[More details](#)

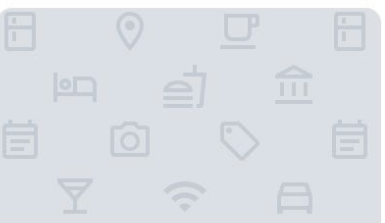
View prices



Standard Room, 1 King Bed, Non Smoking
1 bedroom
Sleeps 3
1 King Bed
[More details](#)



Standard Room, 1 King Bed, Smoking
1 bedroom
Sleeps 3
1 King Bed
[More details](#)



Standard Room, 1 Bedroom, Smoking
1 bedroom
Sleeps 3
1 Large Twin Bed
[More details](#)

Aaron Silas
VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Stone Brook Inn
Sent: Friday, October 16, 2026 8:38 AM
To: Aaron Silas <asilas@cswwgroup.com>
Cc: Melvin Malone <Melvin.Malone@butlersnow.com>; Cari Wymer <Cari.Wymer@butlersnow.com>; John Dollarhide <john.dollarhide@butlersnow.com>; Russ Mitten <rmitten@cswwgroup.com>; Michelle Mairs <michelle.mairs@tn.gov>; Kelly Grams <kelly.grams@tn.gov>; stacy.balthrop@tn.gov <stacy.balthrop@tn.gov>
Subject: Formal Rebuttal – Unsupported Guest-Capacity Assumptions, Reliance on Third-Party Booking Listings, and Request for Independent Review

Dear Mr. Silas,

Thank you for your response. We disagree with Limestone Water's conclusion that the eight-ERU assignment has been adequately substantiated. In your latest response, **you have for the first time confirmed since our dispute started in June 2025** that Limestone relied on *third-party hotel-booking websites* to support an assumed guest capacity, rather than identifying verified, property-specific evidence establishing Stone Brook Inn's actual room configuration and applicable guest capacity.

1. Limestone's 2.5-guests-per-room assumption is not a verified property-specific finding

Your calculation is:

$19 \text{ rooms} \times 2.5 \text{ guests} \times 50 \text{ gallons per guest per day} \div 300 \text{ gallons per ERU} = 7.92 \text{ ERUs}$, rounded to eight ERUs.

The arithmetic follows from the assumption, but the arithmetic does not establish that the assumption is factually correct for Stone Brook Inn. The critical question is how Limestone established that an average of 2.5 guests per accommodation is an appropriate design basis for this particular property.

Stone Brook Inn has 19 accommodations with the following actual configuration and operating limits:

- 11 single-bed accommodations, limited to one guest per accommodation: 11 guests.
- 8 double-bed accommodations, limited to two guests per accommodation: 16 guests.

****Total stated guest capacity: $11 + 16 = 27$ guests.****

Applying the tariff's stated hotel design basis to 27 guests would produce:

$27 \text{ guests} \times 50 \text{ gallons per guest per day} \div 300 \text{ gallons per ERU} = \textbf{4.5 ERUs}$.

This is materially different from the eight ERUs Limestone has assigned. I recognize that the tariff may use design capacity rather than monthly occupancy or actual water usage as its billing determinant. However, that does not eliminate the need to establish the correct design-capacity input before applying the formula.

2. Third-party booking websites are not **conclusive evidence** of Stone Brook Inn's actual capacity

Limestone cites the following sources:

- Hotels.com: <https://www.hotels.com/ho250011/stone-brook-inn-counce-united-states-of-america/>
- Travelocity: <https://www.travelocity.com/Savannah-Hotels-Stone-Brook-Inn.h1378837.Hotel-Information>
- Trip.com: https://www.trip.com/hotels/counce-hotel-detail-2921349/stonebrook-inn/?tid=H0008_10650006152_class

These websites display generic room descriptions such as "sleeps 1" or "sleeps 2". Even nightly rates on these websites are materially different from what we charged to each guests for stone

Brook Inn in order to gain more customers. I provide you another listing which exactly matches our guest capacity calculation of 27 guests-per-night as mentioned earlier calculation.

-Agoda.com https://www.agoda.com/stonebrook-inn_2/hotel/all/counce-in-us.html?locale=en-us&ckuid=0dc3a3ec-d3de-4455-8b13-b027c08d396d&prid=0&cy=USD&correlationId=ec197eb9-b897-4268-a0c0-5c7d2de0bed0&analyticsSessionId=7364902435916552871&pageTypeId=7&realLanguageId=1&languageId=1&origin=US&stateCode=TN&cid=1844104&userId=0dc3a3ec-d3de-4455-8b13-b027c08d396d&whitelabelId=1&loginLvl=0&storefrontId=3&cyId=7&cyCode=USD&htmlLanguage=en-us&cultureInfoName=en-us&machineName=as-pc-3f-cronos-spa-acm-web-5889866d76-czq6s&trafficGroupId=1&trafficSubGroupId=84&aid=130589&useFullPageLogin=true&cttp=4&isRealUser=true&mode=production&browserFamily=Opera+One&cdnDomain=agoda.net&checkIn=2026-10-20&checkOut=2026-10-21&rooms=2&adults=2&childs=0&priceCur=USD&los=1&textToSearch=Stonebrook+Inn&productType=-1&travellerType=3&familyMode=off&ds=kEtEdcOF5nrvb9

Not only this, the link you provided for Hotel.com in your support for the guest-capacity determination clearly shows our room capacity $(11 * 1) + (8 * 2) = 27$. This is the primary source of dispute.

As of now, with this email we have established that our business policy and your reference for support for the guest-capacity determination is matching with 27 guest-capacity and therefore we request you to reconsider ERU assignment for Stone Brook Inn and adjust our ERUs based on 27 guest-capacity.

5. Formal notice of continuing dispute

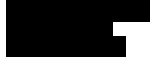
We do not accept Limestone's statement that the matter is closed. A utility's decision to close its internal review does not resolve the underlying factual dispute or prevent me from seeking review through the Tennessee Public Utility Commission and other appropriate channels.

We reserve all rights concerning the disputed assignment, the resulting charges, and any available administrative remedies. Please treat this correspondence as a formal request for reconsideration and preservation of the evidence supporting Limestone's decision.

We request a substantive written response within 5 calendar days of receipt. If Limestone continues to refuse reconsideration, please confirm that position in writing so the dispute can be presented to the Commission with the relevant evidence.

Sincerely,

Jay Patel
Stone Brook Inn



On Thursday, October 15, 2026 at 08:59:25 AM CDT, Aaron Silas <asilas@cswrgroup.com> wrote:

Mr. Patel,

Limestone has reviewed your October 14 email. We previously addressed these issues in our April 15, May 19, July 24, and October 12 responses. I will summarize the information previously provided below.

1. Basis for the eight-ERU assignment

Stone Brook Inn has 19 accommodations. Limestone used a conservative average of 2.5 guests per accommodation. Under Appendix A of Limestone's tariff, hotels are assigned ERUs based on 50 gallons per guest per day, with 300 gallons per day equal to one ERU:

$$19 \text{ rooms} \times 2.5 \text{ guests} \times 50 \text{ gallons} \div 300 \text{ gallons} = 7.92 \text{ ERUs}$$

This calculation, which supports the existing eight-ERU assignment, was previously explained in our April 15, May 19, and July 24 responses.

2. Support for the guest-capacity determination

Stone Brook Inn's [Hotels.com listing](#) advertises one-bed rooms that sleep three guests and double-bed rooms that sleep four guests. Limestone's use of 2.5 guests per room was therefore conservative. A voluntary operating limit does not change the rooms' advertised capacities or the tariff's design-based calculation.

<https://www.travelocity.com/Savannah-Hotels-Stone-Brook-Inn.h1378837.Hotel-Information>

https://www.trip.com/hotels/counce-hotel-detail-2921349/stonebrook-inn/?tid=H0008_10650006152_class

<https://www.hotels.com/ho250011/stone-brook-inn-counce-united-states-of-america/>

3. Historical water usage

We addressed this issue in our April 15, May 19, and July 24 responses. Actual water usage, nightly occupancy, and guest records are not the billing determinants under the tariff. The approved methodology uses a hotel's guest capacity, not actual utilization during a particular month.

4. Transparency and review process

Appendix A of Limestone's tariff provides the Commission-approved methodology and review process. It identifies the hotel classification, guest-based design criteria, ERU formula, information Limestone may consider, underlying reference sources, and customer review procedures.

Limestone reviewed Stone Brook Inn's classification, number of rooms, publicly available room information, and the materials you submitted. The fact that the review did not produce the result you requested does not mean the information was not considered.

5. Timing of Limestone's response

Limestone previously apologized for the delay and explained that your correspondence used an incorrect email address for me. Once the correspondence was identified, Limestone completed its review and responded on October 12. The delay does not change the calculation or outcome.

6. Reconsideration of the assignment

Our July 24 response explained that Limestone would reconsider the assignment if official documentation showed that the number of rooms, room configurations, sleeping capacities, or other relevant facility information was materially inaccurate.

The information provided does not meet that standard. Historical usage, actual occupancy, and a voluntary operating policy do not replace the tariff's design basis, particularly where the publicly advertised room capacities support an assignment greater than eight ERUs.

7. Requested resolution

Limestone has provided the calculation, applicable tariff methodology, supporting property information, underlying reference sources, and review process. The Company has also explained why water usage, actual occupancy, and comparisons to other properties do not support a reduction.

Accordingly, Limestone will not reduce Stone Brook Inn's eight-ERU assignment or issue retroactive credits or refunds. Limestone considers its review complete and this matter closed.

Aaron Silas
VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Stone Brook Inn [REDACTED]
Sent: Wednesday, October 14, 2026 9:33 PM
To: Aaron Silas <asilas@cswrgroup.com>
Cc: Melvin Malone <Melvin.Malone@butlersnow.com>; Cari Wymer <Cari.Wymer@butlersnow.com>; John Dollarhide <john.dollarhide@butlersnow.com>; Russ Mitten <rmitten@cswrgroup.com>; Michelle Mairs <michelle.mairs@tn.gov>; Kelly Grams <kelly.grams@tn.gov>; stacy.balthrop@tn.gov <stacy.balthrop@tn.gov>
Subject: Formal Rebuttal to Limestone Water's Response – Stone Brook Inn's 8-ERU Assignment, Outstanding Evidence Requests, and Notice of Continuing Dispute

Dear Mr. Silas,

Thank you for your email and for providing Limestone Water's formal response to Stone Brook Inn's August 18, 2026 correspondence.

I acknowledge your explanation that your email address was entered incorrectly. Nevertheless, approximately eight weeks elapsed before I received Limestone Water's response. Given the ongoing financial impact of this dispute and the specific documentation requested, I am disappointed that the response does not substantively address the property-specific questions and supporting evidence raised in my August 18 letter.

After reviewing Limestone Water's response, I must respectfully but firmly disagree with the Company's conclusion that its review is complete and that no further action is warranted.

Your response reiterates Limestone Water's position that the eight-ERU assignment is reasonable and consistent with its commercial wastewater methodology. It also refers generally to the Commission's findings in TPUC Docket No. 24-00044. However, it does not provide the calculations, source documentation, or property-specific evidence requested to establish that the eight-ERU assignment is accurate for Stone Brook Inn.

1. Approval of a general rate methodology does not resolve the accuracy of Stone Brook Inn's individual assignment

Stone Brook Inn has consistently distinguished between the Commission's consideration of an ERU-based rate structure and the accuracy of Limestone Water's application of that structure to our property.

We are not asking Limestone Water simply to reconsider whether ERUs may be used as a commercial wastewater billing determinant. We are challenging the factual assumptions used to assign eight ERUs to Stone Brook Inn.

In my August 18 correspondence, I explained that Limestone Water's determination relies on an estimated design capacity of approximately 50 guests, based on an assumed occupancy of 2.5 guests per accommodation. I specifically requested the objective evidence supporting that assumption.

Your response does not identify any engineering study, property inspection, occupancy certificate, building record, site-specific wastewater assessment, or other documentation substantiating the assumed 50-guest capacity.

Please explain how the Commission's general approval of an ERU-based rate design establishes the accuracy of these particular assumptions. If Limestone Water possesses supporting documentation, please provide it. If the assignment is based on generalized assumptions rather than property-specific evidence, please state that clearly and identify the precise assumptions used.

2. Limestone Water has not substantiated its assumed 50-guest design capacity

As explained in my previous letter, Stone Brook Inn has 19 accommodations: 11 single-bed units limited by our business policy to one guest each and eight double-bed units limited to two guests each. Our stated maximum guest capacity under that policy is therefore 27 guests, calculated as follows:

$(11 \times 1) + (8 \times 2) = 27$ guests.

Limestone Water's assumed capacity of approximately 50 guests is materially higher than the operating capacity represented by these accommodation limits.

I recognize that a wastewater design methodology may use prescribed assumptions that differ from actual average occupancy. Nevertheless, Limestone Water must identify the specific design criteria and factual inputs it used to determine that a 50-guest capacity is appropriate for this property.

Please provide the source and version of the applicable design criteria, the precise calculation used to derive the assumed guest capacity, and an explanation of how those criteria apply to Stone Brook Inn's actual configuration and operating restrictions.

Simply reiterating that the eight-ERU assignment is reasonable does not answer this question.

3. Historical metered water usage remains relevant evidence

Limestone Water's position that actual water consumption is not the current billing determinant does not resolve the separate question of whether its design-capacity assumptions are reasonable.

As stated in my August 18 letter, Limestone Water previously acknowledged average monthly water consumption of approximately 14,387 gallons in its TPUC complaint response. Stone Brook Inn also has historical metered water and sewer billing records that can be evaluated against the assumptions underlying the eight-ERU assignment.

These records do not, by themselves, establish the exact volume of wastewater discharged. However, they provide objective operational evidence relevant to assessing whether the assumed design capacity and resulting ERU assignment reasonably reflect the property.

Please identify whether Limestone Water evaluated this evidence when reviewing our challenge. If it did, provide the analysis and explain why the evidence did not warrant a different assignment. If it did not, explain the basis for concluding that the assignment is reasonable without evaluating this available information.

4. The Company's response does not demonstrate compliance with the transparency and challenge process

Your response states that the Commission directed Limestone Water to implement additional transparency and customer challenge procedures and that the Company has done so.

However, the existence of a challenge procedure does not establish that Stone Brook Inn's challenge has been substantively evaluated using accurate information and adequately documented calculations.

My August 18 letter requested, among other things:

- The calculation supporting the assumed 2.5 guests per accommodation.
- The source documentation establishing the assumed 50-guest design capacity.
- Any property-specific engineering evaluations, inspection reports, or occupancy data.
- The methodology used to promote consistency among similarly situated commercial customers.
- A summary of residential and commercial ERU assignments sufficient to evaluate classification and assignment consistency.

Your response does not address these requests individually, provide the requested records, or explain why the information cannot be disclosed.

Please identify the specific tariff provisions and Commission directives governing the challenge process, explain how those provisions were applied to Stone Brook Inn's submission, and identify the records supporting the Company's conclusion.

If Limestone Water believes that any requested information is unavailable, confidential, or outside the scope of the applicable disclosure requirements, please identify the particular information and explain the basis for that position.

5. The eight-week delay does not resolve the outstanding issues

I acknowledge your explanation regarding the incorrectly entered email address. Nevertheless, the delay underscores the importance of a clear written record and timely, substantive responses to customer objections.

Please confirm the date Limestone Water received my August 18, 2026 correspondence and the date the Company completed its review. More importantly, I request that the outstanding questions be addressed directly rather than treating the matter as resolved solely because the Company has restated its existing position.

6. Formal objection to the declaration that the matter is closed

Your letter states that Limestone Water considers its review complete and does not intend to take further action regarding Stone Brook Inn's current assignment unless future information becomes available that warrants review.

I object to that conclusion because the documentation requested in my August 18 letter is information necessary to evaluate the basis of the existing assignment. The absence of that documentation prevents a meaningful assessment of whether the assumed design capacity and eight-ERU determination are factually justified.

Please clarify what Limestone Water considers to be the applicable threshold for "future information" under its tariffed ERU challenge process and whether the Company will accept and evaluate additional property-specific evidence once the requested underlying calculations and assumptions have been disclosed.

Stone Brook Inn requests that Limestone Water reconsider its decision to close the matter without providing a substantive response to the outstanding evidentiary requests.

7. Requested resolution

Accordingly, I request that Limestone Water:

1. Provide the complete calculation and supporting records used to assign eight ERUs to Stone Brook Inn.
2. Substantiate the assumed 50-guest design capacity and the 2.5-guests-per-accommodation assumption with the applicable design criteria and underlying calculations.
3. Explain how Stone Brook Inn's actual accommodation configuration and stated occupancy restrictions were considered.
4. Address the historical metered usage evidence and explain its treatment in the review of our challenge.
5. Identify the applicable Commission-approved tariff provisions and customer challenge procedures relied upon in closing the matter.
6. Provide a substantive written response to each outstanding request in my August 18, 2026 correspondence.
7. Reopen or otherwise reconsider the customer-specific ERU challenge and conduct a documented reassessment using verified property information.

Please provide your written response within 15 calendar days of receipt of this email. If Limestone Water declines to provide any requested information or declines to reconsider the assignment, please state that decision expressly and provide the specific factual, tariff, or regulatory basis for it.

For the avoidance of doubt, Stone Brook Inn does not accept Limestone Water's conclusion that the matter is resolved. We expressly preserve our objections to the eight-ERU assignment, the assumptions used to establish design capacity, the resulting sewer charges, and the adequacy of the information supplied in response to our challenge.

Nothing in this correspondence should be construed as a waiver of any rights, objections, or remedies available to Stone Brook Inn under applicable law or Commission procedures. We also request preservation of all records concerning the assignment, including the underlying calculations, property classification records, customer challenge documentation, internal communications, and communications with the Commission.

If Limestone Water maintains its refusal to provide a substantive, documented response, Stone Brook Inn reserves the right to submit the correspondence and supporting evidence to the Tennessee Public Utility Commission and to seek advice from Tennessee counsel regarding any available administrative or judicial remedies.

I remain willing to pursue a cooperative resolution. However, such a resolution requires Limestone Water to address the factual basis of the eight-ERU assignment rather than simply repeat its conclusion that the assignment is reasonable.

I look forward to your written response.

Sincerely,
Mr. Patel
Manager
Stone Brook Inn
Limestone Water Account [REDACTED]
[REDACTED]

On Monday, October 12, 2026 at 11:30:59 AM CDT, Aaron Silas <asilas@cswrgroup.com> wrote:

Mr. Patel,

I apologize for the delayed response. After reviewing the email chain below, it appears my email address (asilas@cswrgroup.com) was entered incorrectly.

I've attached Limestone's formal response to your message, along with the Commission's Order regarding the Phase 2 implementation of rates, for your review.

Thank you,
Aaron Silas
VP, Customer Experience & Regulatory Operations
Central States Water Resources, Inc.
1-314-380-8510

From: Stone Brook Inn [REDACTED]
Sent: Sunday, October 11, 2026 7:38 PM
To: Melvin Malone <Melvin.Malone@butlersnow.com>; Cari Wymer <Cari.Wymer@butlersnow.com>; support@limestonewateruoc.com; asilas@cswggroup.com
Cc: John Dollarhide <john.dollarhide@butlersnow.com>; Russ Mitten <rmitten@cswggroup.com>; Michelle Mairs (michelle.mairs@tn.gov) <michelle.mairs@tn.gov>; 'kelly.grams@tn.gov' <kelly.grams@tn.gov>; 'stacy.balthrop@tn.gov' <stacy.balthrop@tn.gov>
Subject: Re: TPUC Docket No. 24-00044 – Stone Brook Inn ERU Assignment challenge via Certified mail and Email

Via Certified mail and Email

Good afternoon,

It has been 8 weeks since we submitted the response to your letter regarding commission directed ERU assignment challenge and we have not received any response from Melvin J Malone, Butler Snow LLP or from Limestone Water UOC LLC.

We are re-sending this letter once again for your consideration and review.
Hope we will get the all answers including supporting documents that have been requested in the attached letter.

Let us know if there are any questions. Thank you.

Manager
Stone Brook Inn
T [REDACTED]
[REDACTED]

On Tuesday, August 18, 2026 at 08:45:47 PM CDT, Stone Brook Inn <stonebrookinn@yahoo.com> wrote:

Good afternoon,

Please see the attached response letter regarding your July 24, 2026 email to Stone Brook Inn.

Let us know if there are questions. Thank you.

Manager
Stone Brook Inn
[REDACTED]
[REDACTED]