From: Kelly Grams <Kelly.Grams@tn.gov>
Sent: Thursday, October 22, 2026 10:27 AM
To: Stonecash Jared <stonectj@yahoo.com>
Cc: Mr. Josiah Cox <jcox@cswrgroup.com>; Aaron Silas <asilas@cswrgroup.com>; Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; Ashlee Hatfield <Ashlee.Hatfield@tn.gov>
Subject: Re: [EXTERNAL] Fw: Formal Contest of ERU Assignment and Complaint against Central States Water Resources--Limestone Water UOC

Good morning, Mr. Stonecash,

Informal, non-binding ADR (mediation) is currently a limited pilot program intended only to facilitate discussion between the utility and customer. It is not available upon request. In addition, a reconsideration of the ERU assignment is required before we can determine whether mediation would be an appropriate and effective means of resolving the dispute. Because reconsideration under Limestone's tariff cannot be completed without additional information from you, we regret that we are unable to assist you. Thank you.

Tennessee Public Utility Commission

Andrew Jackson State Office Bldg., 4th FL

502 Deaderick Street, Nashville, TN 37243

p: 615-770-6856 | e: kelly.grams@tn.gov

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From: Stonecash Jared [redacted]
Sent: Wednesday, October 21, 2026 3:51 PM
To: Ashlee Hatfield <Ashlee.Hatfield@tn.gov>; Karen H. Stachowski <Karen.stachowski@ag.tn.gov>; Kelly Grams <Kelly.Grams@tn.gov>; Josiah Cox <jcox@cswrgroup.com>; Aaron Silas <asilas@cswrgroup.com>
Subject: Re: [EXTERNAL] Fw: Formal Contest of ERU Assignment and Complaint against Central States Water Resources--Limestone Water UOC

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Facebook?! That's your source of information, Mr. Silas?

That's your legal threshold for justification of price gouging of utilities in the state of Tennessee? That's just embarrassing.

Ms. Grams, how can I apply for the ADR?

Thank you,
Jared Stonecash

On Wednesday, October 21, 2026 at 03:12:02 PM CDT, Aaron Silas <asilas@cswrgroup.com> wrote:

Ms. Hatfield,

Please see the attached email chain containing my response to Mr. Stonecash. As noted there and during the early August phone call between Mr. Stonecash and my team, I am willing to reconsider the ERU assignment if we receive the requested information showing that the attached posting is inaccurate. Until that information is provided, Mr. Stonecash's request for reconsideration remains denied.

Thanks,

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

From: Ashlee Hatfield <Ashlee.Hatfield@tn.gov>
Sent: Wednesday, October 21, 2026 3:01 PM
To: Stonecash Jared [redacted] Karen H. Stachowski <Karen.stachowski@ag.tn.gov>; Kelly Grams <Kelly.Grams@tn.gov>; Aaron Silas <asilas@cswrgroup.com>; Josiah Cox <jcox@cswrgroup.com>
Subject: RE: [EXTERNAL] Fw: Formal Contest of ERU Assignment and Complaint against Central States Water Resources---Limestone Water UOC

Mr. Silas,

Would you please confirm the status of Mr. Stonecash's request for review of the ERU assignment and Limestone's response?

Thank you.

From: Stonecash Jared [redacted]
Sent: Sunday, October 18, 2026 3:58 PM
To: TPUC DocketRoom <TPUC.DocketRoom@tn.gov>; Ashlee Hatfield <Ashlee.Hatfield@tn.gov>; Karen H. Stachowski <Karen.stachowski@ag.tn.gov>; Kelly Grams <Kelly.Grams@tn.gov>; Aaron Silas <asilas@cswrgroup.com>; jcox@cswrgroup.com
Subject: [EXTERNAL] Fw: Formal Contest of ERU Assignment and Complaint against Central States Water Resources---Limestone Water UOC

Commissioner Hilliard,

I would like to inform you that Limestone Water is not adhering to the TPUC's order to resolve formal challenges within 45 days per page 34 of the Amended Order dated August 28th, 2026 on Docket No. 24-00044 (attached).

I would like to elevate this complaint to an Alternative Dispute Resolution and solicit the help of your office and the General Counsel, Kelly Cashman-Grams.

Please see the attached and below for my formal complaint that I seek a "just and reasonable" resolution of.

Regards and thank you for your time,

Jared Stonecash

[redacted]

From: Stonecash Jared [redacted]
Sent: Wednesday, 14 October 2026 21:09:49
To: Limestonewateruoc Support <support@limestonewateruoc.com>; Josiah Cox <jcox@cswrgroup.com>

Cc: ConsumerComplaint TPUC <consumercomplaint.tpuc@tn.gov>; Grace Vinson <grace.vinson@tn.gov>; Michelle Mairs <michelle.mairs@tn.gov>; Karen H. Stachowski <karen.stachowski@ag.tn.gov>; Shilina B. Brown <shilina.brown@ag.tn.gov>; David.f.jones@tn.gov <David.f.jones@tn.gov>; Carlos Black <carlos.black@tn.gov>; Stacy Balthrop <stacy.balthrop@tn.gov>; Kelly Grams <kelly.grams@tn.gov>; Rosalie Gunger <rosalie.gunger@ag.tn.gov>; Vance Broemel <vance.broemel@ag.tn.gov>; TNConsumerAdvocate <tnconsumeradvocate@ag.tn.gov>; john.west@troutman.com <john.west@troutman.com>
Subject: Re: Formal Contest of ERU Assignment and Complaint against Central States Water Resources---Limestone Water UOC

Mr. Cox,

It has been over 45 days since my formal complaint filed on August 30th, 2026, and I have received no response nor resolution from your company. Per your own Water and Wastewater Service Tariff, Section A.5 (c):

"(c) Timing of Resolution The company shall resolve each complete ERU review request within forty-five (45) days of receipt of all necessary information."

When can I expect some formal communication on this matter?

Thank you,

Jared Stonecash

[redacted]

On Sunday, August 30, 2026 at 08:37:45 PM EDT, Stonecash Jared [redacted] wrote:

Hello Mr. Cox,

Please see below and attached for formal contest of Limestone Water Utility Operating Company, LLC's assignment of my personal residence as being Commercial and having 4 Equivalent Residential Units.

Please call me should any additonal information be required.

Thank you,

Jared Stonecash

[redacted]

My complaint is with my septic/sewer provider: Limestone Water UOC LLC, a subsidiary of Central States Water Resources. My account number is [redacted]. My address is [redacted] I do not receive water services from them, only septic service.

On June 1st, 2026, they issued a new Water and Wastewater Service Tariff. My monthly rate increased by **422%** from $57.79/month to $302.03/month. I want to formally contest the designation of my property as Commercial with four (4) Equivalent Residential Units (ERU's).

Here is the evidence why this rate increase is unjustified:

- My single-family home is being assigned ERU = 4.0. By Limestone's own calculations in Appendix A.3 ERU Calculation Method of the Water & Wastewater Service Tariff, a property with ERU = 4.0 means the property is using 1,200 gallons per day (1 ERU = 300 gallons per day). In reality, my property is using an average of 227 gallons of water per day according to **Figure 1** and **Figure 2** below, which are actual water bills for the single-family home from the LaFollette Utilities Board. **According to this actual usage data, my residence should be assigned as ERU = 1.0.** It's also important to note that obviously not all water consumed by my home goes down the drains and thru the septic system. As such, these water bills reflect the absolute worst-case scenario for septic usage. I am more than happy to provide access to my water consumption so that each month I am charged my fair share appropriately. Lack of access to water consumption for individual residences is not a justifiable defense to drastically overcharge homeowners in a socialistic fashion.

Figure 1. Actual water usage data-12 months.

09/19/2025 2025/09
14:41:12 LOAD HISTORY - LOAD HISTORY - WATER
9817

[redacted]

[redacted]
Meter 33037945
Rate 301 Joint Account Name

Month	Days	Usage	Avg	Charges	Usage Chgs	Demand	KVA	PF
9/2025	33	195	5.91	151.34	149.79			
8/2025	30	198	6.60	152.90	151.35			
7/2025	33	113	3.42	108.88	107.33			
6/2025	28	19	0.68	43.40	41.85			
5/2025	30	3	0.10	32.77	31.22			
4/2025	28	2	0.07	32.77	31.22			
3/2025	33	1	0.03	32.77	31.22			
2/2025	30	47	1.57	64.66	63.11			
1/2025	28	129	4.61	121.84	120.29			
12/2024	28	5	0.18	32.77	31.22			
11/2024	34	45	1.32	78.76	77.21			
10/2024	34	73	2.15	68.79	67.24			
TOTAL	369.	830.00	26.64	921.65	903.05			
AVG	30.75	69.17	2.22	76.80	75.25			

Annual Load Factor 0.00
Annual Cost per kWh $1.1104

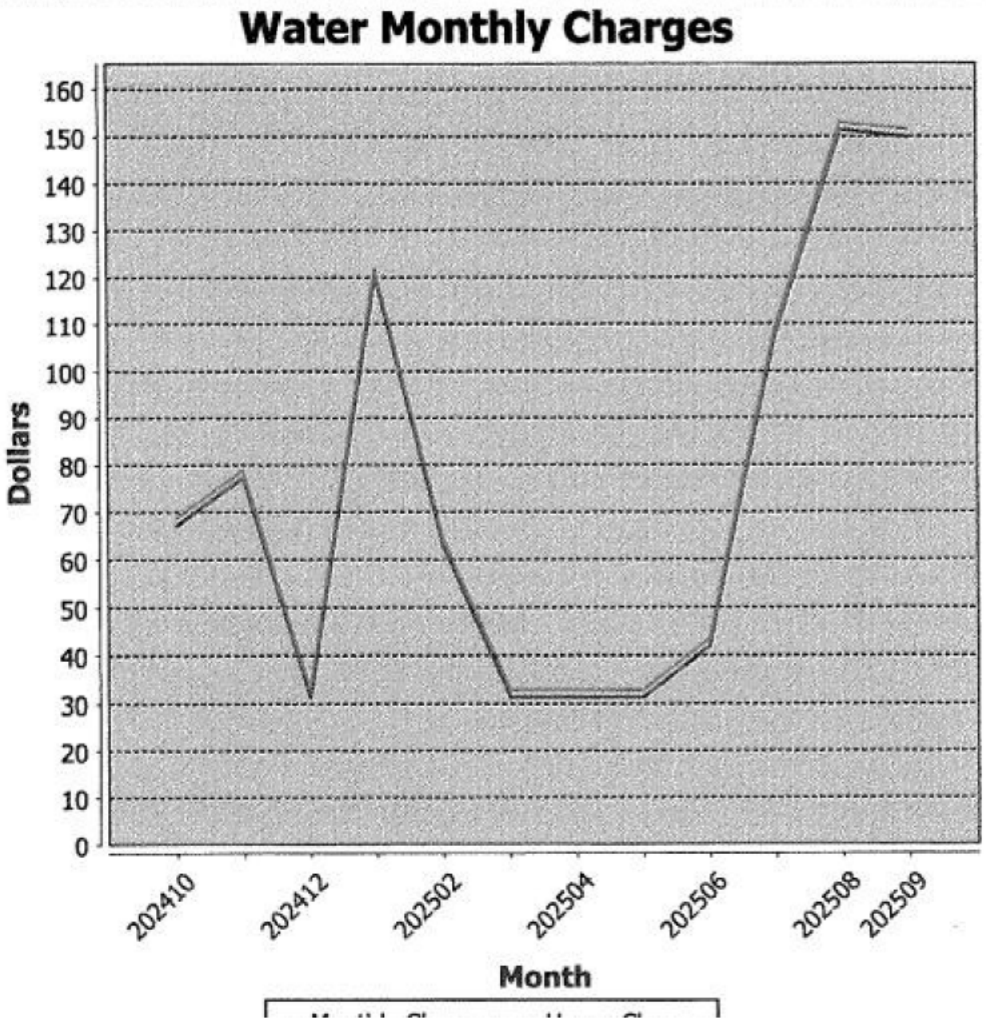


Figure 2. Actual water usage data-2026.

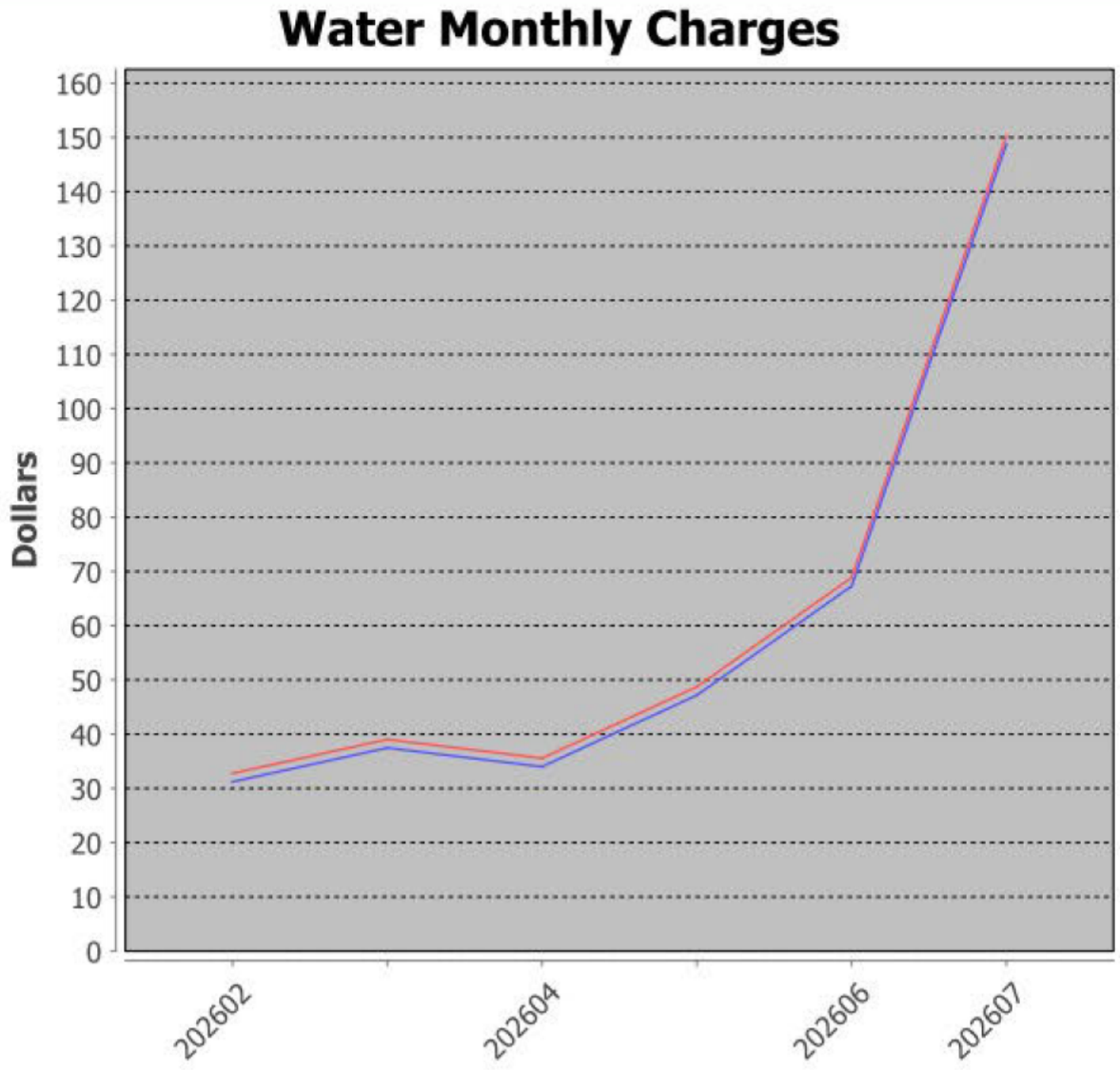
07/20/2026 2026/07
12:43:03 LOAD HISTORY - LOAD HISTORY - WATER
9817

[redacted] [redacted]

Rate 301 Joint Account Name

Month	Days	Usage	Avg	Charges	Usage Chgs	Demand	KVA
7/2026	28	193	6.89	150.30	148.75		
6/2026	29	52	1.79	68.85	67.30		
5/2026	33	23	0.70	48.73	47.18		
4/2026	30	4	0.13	35.55	34.00		
3/2026	21	9	0.43	39.02	37.47		
2/2026	3	0	0.00	32.77	31.22		
TOTAL	144.	281.00	9.94	375.22	365.92		
AVG	24.00	46.83	1.66	62.54	60.99		

Annual Load Factor 0.00
Annual Cost per kWh $1.3353



- My home has 7 bedrooms, 4.5 bathrooms, and sleeps 14. Any Google searches showing something to the contrary were not approved by the current owner. I am not responsible for false information on the internet. No representatives from Limestone have ever been inside my home nor have they spoken with me and inquired how many bedrooms or beds there are, and they for sure are clueless on how many days of the year the home is occupied and by how many people. As a side note, as a private residence, it is no one's business how many beds, cots, or hammocks are contained inside the home. I have paid gas, electric, sewer, trash, internet, and water services for over 25 years on dozens of properties. I have never once been charge based on a reckless internet search of how many bedrooms are in the residence nor the number of beds or couches. The mere thought of that is comical. Can you imagine another utility not charging you based on your pro-rata share? It is 2026. Digital data and meters are readily available. It's time to get with the times and charge people for utilities based on the values that this country was founded on. Limestone is using the transitive property of reasoning, but in this case, it is a fallacy that the number of bedrooms equates to full occupancy year-around and have based their ERU and septic charges based on this fallacy.

I also want to formally contest the classification of my property as commercial. It is Residential; it is a single-family home used primarily for personal usage. It is not a business. My home is a single-family residence that is used primarily as a personal dwelling. 76% of the year (276 days) it is used as a personal residence. Note the term "primarily" is used in the Limestone Tariff, Rules and Regulations Section C.3. Webster's dictionary defines "primarily" as "for the most part; chiefly" or "in the first place; originally". Even non-mathematicians would agree with the definition of "primarily" would be anything over 50%. My home is being classified as an Apartment/Resort. My home is neither of these. Dollywoood and Disney World are resorts. Legally, an apartment building is a multi-family residential structure containing a specific minimum number of distinct dwelling units—typically three or more—that share common structural elements, access corridors, or entrances, with each individual unit equipped for independent living. My home has a single water meter, a single electric meter and a single exterior, front door. There are not multiple dwellings under my roof and therefore clearly not an apartment building. The single-family home at 143 Northbridge Lane should be classified as RESIDENTIAL as it is in fact a single-family residence used primarily as a personal residence. As such, the ERU for this dwelling should be equal to 1.0. Pictures of the residence, **Figure 3**, here clearly do not depict a resort, nor an apartment building:



Figure 3. Front door and exterior of single-family RESIDENTIAL home at [redacted]

- Section J8 states that the company may not send a customer two successive estimated bills. **ALL** of my bills are estimated as they are being billed as a flat rate regardless of the amount of usage.

Lastly, I strongly question the legality of Appendix A, Section A.5 – (d) of the Tariff:

(d) Application of Changes

Any approved change to a customer's ERU assignment shall be applie
and shall not result in retroactive billing adjustments.

I will be seeking retroactive refunds for this miss-classification of my property. It's mind boggling how everyone on the TPUC blindly signed off on this clause that is a blatant attempt by Limestone to flex their monopolistic powers and price gouge customers with no alternatives. I will be actively seeking legal counsel and action beyond the consumer advocacy group of the Attorney General's office.

I am requesting that this price gouging and misclassification be corrected immediately and my account be credited for the overcharges that have been accrued and paid to date.

Thank you,

Jared Stonecash

[redacted]

[redacted]

[redacted]

[redacted]