

TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
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July 24, 2026

Electronically Filed in TPUC Docket
Room on July 24, 2026 at 12:29 p.m.

Integrated Resource Management, Inc.
ATTN: Jeffrey W. (Billy) Cox, Jr.
President
P.O. Box 71526
Knoxville, TN 37938

VIA Email to IRMutility@gmail.com

Re: *In Re: Integrated Resource Management, Inc. Request Pursuant to TPUC Rule 1220-04-13-07(7) the Emergency Release of Escrow Funds*, TPUC Docket No. 26-00061.

Dear Mr. Cox:

The Tennessee Public Utility Commission ("TPUC" or "Commission") received a letter from Integrated Resource Management, Inc., d/b/a IRM Utility ("IRM") detailing an emergency request to access and utilize escrow funds dated July 13, 2026. According to the letter, the work and materials were provided, but payment for them had not yet been made.¹

In its letter, IRM requests approval to withdraw funds from its escrow account the following:

- a) \$2,361.31 from IRM's escrow account to replace a panel at 4525 Shangrila Way in Mountain Shangrila Subdivision and replace a pump at 1325 Still Mountain Way in Waterside at Douglas Subdivision.²
- b) \$4,801.04 to replace a pump and vault at King of Mtn. Cabin Wild Briar and replace a pump at 647 Stockton Dr. in Grand View Subdivision.³
- c) \$3,912.38 to replace a pump at the Clubhouse in Cove Creek Campground, to replace a pump at 1172 Bhairavi in ISHA Enclave Subdivision, and to replace a pump and floats at Jack's Hollow in Flat Hollow Subdivision.⁴

In support of its requests, IRM also attached three invoices for non-routine maintenance work and

¹ *Integrated Resource Management, Inc. Request Pursuant to TPUC Rule 1220-04-13-07(7) the Emergency Release of Escrow Funds*, (With Exhibits A, B, and C), p. 1 (July 13, 2026).

² *Id.*

³ *Id.*

⁴ *Id.*

materials provided on IRM's behalf.⁵ The letter states that the request for the emergency release of escrow funds is made pursuant to TPUC Rule 1220-04-13.07(7).⁶

In Docket No. 25-00085, the Commission held a rulemaking proceeding to amend certain wastewater regulations, including new rules for Reserve/Escrow Accounts applicable to public wastewater utilities. Rule 1220-04-13-.18, which sets forth the procedure for accessing escrow and reserve accounts, was effective July 9, 2026, four days before IRM's filing in this docket. Rule 1220-04-13-.18(3) revised the procedure for accessing escrow/reserves account funds and provides, in pertinent part, as follows:

- (a) Within thirty days of accessing escrow funds, a utility must file a written notice with the Commission detailing the situation that required the use of escrow funds, the amount and date of the withdrawal, and an accounting of how the funds were used, inclusive of supporting documentation such as invoices, bank statements, and account ledgers. The Commission or its designee will decide whether the circumstances and use of the funds qualify as an emergency expense or a necessary capital project.
- (b) If it is determined that the withdrawal of escrow funds was not due to an emergency expense or necessary capital project, it will notify the utility to either reimburse the escrow account for the amount of the withdrawal or file a petition with the Commission requesting to use the withdrawn funds for the specified purpose. If, within thirty days of the Commission's notice, the utility fails to either reimburse the escrow account for the withdrawn funds or file a petition requesting approval to use the withdrawn funds, the Commission may order the utility to reimburse the escrow account with interest and may impose a civil penalty for the improper withdrawal.
- (c) Prior to withdrawing escrow funds, a utility may file a petition requesting to use escrow funds for a purpose other than emergency expenses or necessary capital projects, and upon approval by the Commission, the utility may access escrow funds for such purposes.⁷

The above provisions authorize the Commission, or its designee, to determine whether a withdrawal was proper under the rule.⁸ The change was intended to expedite the process.

On July 13, 2026, the Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate") filed a response to IRM's request. The Consumer Advocate's response stated, in pertinent part, as follows:

As part of the review, the Consumer Advocate compared the requested recovery with the language set out in Mr. Craig Cox's testimony in TPUC Docket. No. 24-00073 (pp. 10-11) about the use of escrow and the discussions that occurred in

⁵ *Id.* at Exs. A-C.

⁶ *Id.* at 1.

⁷ Tenn. Comp. R. & Regs. 1220-04-13-.18.

⁸ *Id.*

TPUC Docket Nos. 25-00023, 25-00051, and 25-00059. The Consumer Advocate has completed its review and determined that the requested reimbursements fall within the enumerated activities deemed by Staff as less routine and covered by escrow.

Based on the information provided in the emergency request, including the invoices, the repair expenses qualify as an emergency expense. Therefore, the request to expend escrow funds to pay for repairs totaling \$11,074.73 is determined to be an appropriate use of such funds. IRM may access the escrow funds in this amount.

Sincerely,

A handwritten signature in black ink, appearing to read "John S. West", with a stylized flourish at the end.

John S. West, Senior Counsel

cc: Docket File