

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:	)	
	)	
APPLICATION OF LIMESTONE	)	
WATER UTILITY OPERATING	)	
COMPANY, LLC, TO EXPAND ITS	)	DOCKET NO. 26-00063
CERTIFICATE OF CONVENIENCE	)	
AND NECESSITY TO SERVE THE	)	
TROUBADOUR GOLF+FIELD CLUB	)	
SUBDIVISION	)	

PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or the “Commission”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties, or privileges may be determined or affected by the *Application of Limestone Water Utility Operating Company, LLC, to Expand Its Certificate Of Convenience and Necessity to Serve The Troubadour Golf+Field Club Subdivision* (“Application”) filed in TPUC Docket No. 26-00063.

For cause, the Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in any matter or proceeding before the Commission in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. §§ 4-5-101, *et seq.*, and TPUC rules.

2. The *Application* is seeking to expand Limestone CCN for the Troubadour subdivision described as:

[C]ontaining 375 lots located on approximately 739 acres in Williamson County, Tennessee. The proposed expansion of the subdivision will add 85 lots on approximately 157 acres. The subdivision is located at 8000 Club View Drive, College Grove, Tennessee.¹

3. Limestone Water Utility Operating Company, LLC (“Limestone”) is a Tennessee limited liability company, whose principal office is located at 655 Maryville Centre Drive, Suite 200, St. Louis, Missouri 63141.² Limestone’s sole member is Limestone Water Utility Holding Company, LLC (“LWUHC”), a Tennessee limited liability company, whose sole officer is its President, Josiah Cox.³ Limestone’s affiliate, Central States Water Resources, LLC (“CSWR”), which is a Missouri limited liability company, with its principal office is also located at 655 Maryville Centre Drive, Suite 200, St. Louis, Missouri 63141, provides financial, technical and managerial expertise and services to each of the group’s utility operating affiliates and will manage Limestone and the system, if the Commission approves the transaction.⁴

4. The interests of consumers in this CCN Expansion *Application* may be affected by determinations and orders made by the Commission with respect to its jurisdiction and its interpretation, application, and implementation of Tenn. Code Ann. § 65-4-101(6) and other relevant statutory and regulatory provisions. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

¹ *Application of Limestone Water Utility Operating Company, LLC, to Expand Its Certificate of Convenience and Necessity to Serve The Troubadour Golf+Field Club Subdivision*, p. 6, TPUC Docket No. 26-00063 (July 22, 2026).

² *Id.* at 4.

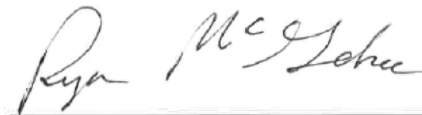
³ *Id.* at 5.

⁴ *Id.* at 5.

Accordingly, the Consumer Advocate respectfully requests the Commission to grant this
Petition to Intervene.

RESPECTFULLY SUBMITTED,


JONATHAN SKRMETTI (BPR No. 031551)
Attorney General and Reporter
State of Tennessee



RYAN MCGEHEE (BPR No. 025559)
Assistant Attorney General
SHILINA B. BROWN (BPR No. 020689)
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Telephone: (615) 360-4219
Email: ryan.mcgehee@ag.tn.gov
Email: shilina.brown@ag.tn.gov

TPUC Docket No. 26-00063
CA's Petition to Intervene

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail,
with a courtesy copy by U.S. Mail, by request, provided upon:

Melvin Malone
Butler Snow LLP
1320 Adams Street, Suite 1400
Nashville, TN 37208
(615) 651-6700
Melvin.Malone@butlersnow.com

This the 25th day of September 2026.



RYAN MCGEHEE
Assistant Attorney General