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Via email to ashlee.hatfield@tn.gov

Hon. Herbert H. Hilliard, Chairman
Tennessee Public Utility Commission
Andrew Jackson State Office Building
502 Deaderick Street
Nashville, TN 37243

**RE: TPUC Docket No. 26-00063
Application of Limestone Water Utility Operating Company, LLC to
Expand its Certificate of Convenience and Necessity to Serve the
Troubadour Golf + Field Club Subdivision**

Commissioners:

On behalf of Troubadour Golf + Field Club ("Troubadour"), we respectfully submit this letter in connection with the Petition to Intervene filed by the Consumer Advocate Division of the Tennessee Attorney General's Office in the above-referenced proceeding. While we recognize and respect the Consumer Advocate's statutory responsibility to represent utility customers, we believe the facts of this particular application demonstrate that the requested certificate expansion should be viewed as a routine and non-controversial extension of an existing service area that poses no adverse impact to utility customers.

The application before the Commission is simply an expansion of the existing Certificate of Convenience and Necessity previously granted to provide wastewater service to the Troubadour development. This request does not involve the creation of a new utility system, a transfer of assets, or a change in utility ownership. Rather, it seeks authorization to extend service to an additional portion of the same master-planned development that has been served under the existing CCN framework for many years.

Importantly, no changes in wastewater rates are proposed as part of this application. Existing customers will experience no increase in rates, fees, assessments, or other charges as a result of the requested CCN expansion. Likewise, no modification to the utility's approved rate structure is contemplated or requested. Further, the costs associated with extending service to the expansion area are being funded by the developer and not by Limestone Water Utility Operating Company, LLC, or its existing customer base. As a result, existing utility customers are not being asked to subsidize infrastructure improvements associated with this development expansion. Because the developer bears the costs of the extension, approval of the application will not create any financial burden or adverse impact on current ratepayers.



TROUBADOUR

This request is also consistent with the Commission's prior treatment of the Troubadour development. Over approximately the last twenty years, the Commission has approved multiple CCN expansions associated with the phased development of Troubadour. The current application represents the continuation of that long-standing development pattern and is, in substance, the third expansion of the service territory related to this project. The Commission has previously recognized that phased growth within a master-planned development can appropriately be accommodated through incremental expansions of an existing CCN.

Because the requested expansion merely extends service to additional property within the same overall development, does not alter rates, does not shift costs to existing customers, and is funded by the developer, there is no identifiable consumer harm associated with the application. To the contrary, approval will allow utility service to be provided efficiently and consistently within an existing development already served under Commission-approved authority.

As with any development, time is of the essence and granting periods of protracted discovery present significant delays in the overall master planned development to the community and ultimately hinder our ability to provide appropriate services to its consumers. Delayed proceedings also can inhibit our ability to acquire the adjacent property and continue proceedings with local AHJs for necessary approvals of this community.

For these reasons, Troubadour respectfully requests that the Commission give substantial weight to the limited nature of this application and recognize that it presents none of the consumer protection concerns that are often present in more complex utility proceedings involving rate changes, acquisitions, financing requests, or transfers of control.

We appreciate the Commission's consideration of this matter and respectfully request approval of the CCN expansion application.

Respectfully submitted,

TROUBADOUR GOLF + FIELD CLUB

By: Johan A. Kok, Project President