

October 9, 2026

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on October 9, 2026 at 1:18 p.m

Cole McCormick
Regulatory Analyst, Utilities Division
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

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

Dear Mr. McCormick:

We are in receipt of your data requests to Limestone Water Utility Operating Company, LLC (“Limestone”), dated October 2, 2026. Please find Limestone’s responses below.

1-1. *Per Commission Rule 1220-04-13-.17(2)(e)(9): Provide estimates of costs and customers added to the service area expansion by month for the first five (5) years based upon the construction build-out schedule for developers in the service area of the proposed wastewater system. For each year, by month, provide an estimated number of customers by customer class anticipated to be served by the wastewater system. Include the utility’s basis and assumptions used for this projection. Provide this information in a spreadsheet in Microsoft Excel format with all assumptions clearly documented.*

Response: The proposed service-area expansion includes approximately 85 residential lots. Based on the current information available to Limestone, only the area below the Killen Parcel is anticipated for development, and platting and infrastructure installation are not expected for approximately three to five years, subject to applicable regulatory and county approvals. Because a construction schedule has not yet been developed, Limestone cannot presently provide the monthly construction cost or residential customer projections for the requested five-year period.

1-2. *Provide the SOP modification application that was issued to TDEC regarding the Troubadour service area expansion. Further, if TDEC has provided an updated*

*Neuhoff Building
1320 Adams Street, Suite 1400
Nashville, TN 37208*

MELVIN J. MALONE
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*T 615.651.6700
F 615.651.6701
www.butlersnow.com*

BUTLER SNOW LLP

permit or other documentation regarding this permit modification, please provide that information.

Response: Please see the attached SOP modification application and supporting engineering plans submittal. TDEC has not issued an updated permit at this time.

- 1-3. *In Appendix A-4 of the Petition (footnote 8), the Petitioner states that Discovery Builders Tennessee, LLC is the anticipated contractor for this project, but that no construction agreement had been finalized at the time of filing. If a construction agreement has since been executed, please file a copy in the docket.*

Response: As stated in Appendix A-4 of the Petition, a construction agreement with Discovery Builders Tennessee, LLC had not been finalized at the time of filing. No construction agreement has subsequently been executed. If the Commission approves of this application, the developer anticipates entering into a construction agreement with an appropriately licensed and qualified contractor before construction begins.

- 1-4. *If Limestone has obtained a financial security instrument compliant with Commission Rule 1220-04-13-.17(2)(e)(11), please provide that documentation.*

Response: Limestone has not obtained the requested performance bond because construction of the proposed expansion has not commenced and the developer has not finalized its construction arrangements. Limestone understands that the developer anticipates providing an appropriate performance bond before construction begins.

As required, copies will follow. Please feel free to reach out to me if you have any further questions.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachment

cc: Russ Mitten, Central States Water Resources
Mayor Curtis Lane, City of Grand Junction
Ryan McGehee, Consumer Advocate Division
Shilina B. Brown, Consumer Advocate Division

**Limestone Water Utility Operating Company, LLC's
Responses to Commission Staff's October 2, 2026 Data Requests**

TPUC Docket No. 26-00063

Attachment 1.2

Application for State Operating Permit (SOP)

version 1.2

(Submission #: HQQ-JCDQ-H3NAH, version 1)

Details

Originally Started By Garrad Johnson
Submitted 8/17/2026 (53 days ago) by Jacob Freeman
Submission ID HQQ-JCDQ-H3NAH
Status Complete

Fees

Fee \$1,750.00
Payments/Adjustments (\$1,750.00)
Balance Due \$0.00 (Paid)

Form Input

SOP Application Type

Permit Number
SOP-07090

Application Type
Design Modification (e.g. increased design flow)

Activity Type
Land Application Treatment System

Please provide a brief description of the design modifications taking place
Adding additional zones of drip dispersal to the existing system to support increased design flow.

Facility Identification

Facility Name

Cartwright Creek - Hideaway Devel. WWTP

Facility Address/Location

6545 COX RD

COLLEGE GROVE, TN 37046-7108

County

Williamson

Facility Location

35.815194,-86.67697

List the permit numbers of any other State or Federal Water/Wastewater Permits that have been obtained for this site.

NONE PROVIDED

Applicant Information

Please provide details on the name of city, town, industry, corporation, individual, etc., applying, according to the provisions of Tennessee Code Annotated Section 69-3-108 and Regulations of the Tennessee Water Quality Control Board. The legal entity. For entities registered with the Secretary of State (SOS), this field should be the same as the name registered under the SOS Control Number listed in this form. For municipalities, the name should be the entire name of the municipality such as "Town of ", "City of", "Example County", "Example Utility District".

If the form does not allow for a change to the applicant name and you need to make a change, please contact your previous permit writer or send an email to Water.Permits@tn.gov for additional instructions.

Applicant Name

Limestone Water Utility Operating Company, LLC

Is the Applicant a Government Entity or Municipality?

No

Please Lookup SOS Control Number

If you do not know your SOS Control Number, please access the Tennessee Secretary of State Business Information search engine below.

[Tennessee Secretary of State Business Search](#)

Provide the Tennessee Secretary of State (SOS) Number

000472078

Has the applicant filed for CCN/Amended CCN?

Yes

Enter Docket Number

26-00063

Has the applicant submitted a financial security for this activity to TDEC-Financial Assurance Division?

No

Does the applicant listed above currently own the system?

Yes

Describe any seasonal/atypical operating patterns.

NONE PROVIDED

Entity Types/Design Units (1 of 2)

Subdivision

Entity Type

Subdivision

Flow (gpd)

127,500

Number of homes

425

Avg. No. bedrooms per home

5

Entity Types/Design Units (2 of 2)

Other - Please Describe

Entity Type

Other - Please Describe

Please Describe

Subdivision Amenities

Flow (gpd)
47,800

Contacts

Official Contact

Prefix
Mr.

First Name	Last Name
Josiah	Cox

Title
President

Company Name
Central States Water Resources (CSWR)

Phone Type	Number	Extension
Business	314-736-4672	8

Email
jcox@cswrgroup.com

Address
1630 Des Peres Rd., Suite 140
Des Peres, MO 63131

Other Official Contact Roles

NONE PROVIDED

Is this also the the billing contact?
No

Billing Contact Information**Prefix**

Mr.

First Name

Jessica

Last Name

Rickman

Title

Accounts Payable Manager

Phone Type

Business

Number

314-380-8535

Extension**Email**

ap@cswrgroup.com

Address

1630 Des Peres Rd Suite 140

Des Peres, MO 63131

Other Billing Contact Roles*NONE PROVIDED***Do you have any additional contacts to provide?**

Yes

Additional Contacts (1 of 4)

Johnson, Joe

Additional Contacts**Prefix**

Mr.

First Name

Joe

Last Name

Johnson

Title

EHS Compliance Coordinator

Phone Type

Business

Number

314-380-9498

Extension

148

Email

jjohnson@cswrgroup.com

Address

655 Maryville Centre Dr., Ste. 200

St. Louis, MO 63141

Other Contact Roles

Facility Contact

Contact Email

jjohnson@cswrgroup.com

Additional Contacts (2 of 4)**Lewie, Charles**

Additional Contacts**Prefix**

Mr.

First Name

Charles

Last Name

Lewie

Title

Plant Operator

Phone Type

Business

Number

615-753-5872

Extension**Email**

clewie@cswrgroup.com

Address

1414B Boscobel St

Nashville, TN 37206

Other Contact Roles

Optional Contact

Contact Email

clewie@cswrgroup.com

Additional Contacts (3 of 4)**McCormick, Cole**

Additional Contacts**Prefix**

Mr.

First Name

Cole

Last Name

McCormick

Title

Utilities Consultant / Contact

Phone Type

Business

Number

615-770-6871

Extension**Email**

cole.mccormick@tn.gov

Address

502 Deaderick Street, 4th Floor

Nashville, TN 37243

Other Contact Roles

Government Official

Contact Email

cole.mccormick@tn.gov

Additional Contacts (4 of 4)**Starrett, Lynn**

Additional Contacts**Prefix**

Mr.

First Name

Lynn

Last Name

Starrett

Title

Area Manager

Phone Type

Business

Number

615-736-4949

Extension**Email**

Lstarrett@cswrgroup.com

Address

1006 Treatment Plant Rd.

Franklin, TN 37069

Other Contact Roles

Facility Contact

Contact Email

Lstarrett@cswrgroup.com

Engineering Report

Provide your Plans Review tracking number or Submission ID for your Preliminary Engineering Report

HQQ-K0G9-GTY0C

Please provide the date of the Preliminary Project Discussion.

04/21/2026

[State of Tennessee Design Criteria for Sewage Works](#)

Has the Preliminary Engineering Report (PER) been accepted by DWR for implementation?

Yes

What is the date of your acceptance letter?

08/06/2026

Has the Operation and Maintenance Inspection Schedule been submitted?

No

Operation and Maintenance Inspection Schedule

NONE PROVIDED

Comment

NONE PROVIDED

Land Application Treatment System**Type of Land Application Treatment System**

Drip

Link to UIC form

Underground Injection Control Form

https://www.forms.tdec.tn.gov/UIC_CLASS_V**Type of Treatment Facility Preceding Land Application**

Fixed Film Media Filter

Make and Model

Cambrian T-100

Proposed acreage involved (in acres):

17.7

Gpd/sq. ft., loading rate to be applied:

0.23

Treatment Schematic[Appendix H Process Flow Diagram.pdf - 08/04/2026 03:47 PM](#)**Comment**

NONE PROVIDED

Describe methods to prevent and respond to bypass of treatment or discharges.

Should treatment be offline for any reason then sewage is then to be routed to the Long Term Storage which has a 40 day storage of design flow. Once treatment is back online then sewage is routed back from the Long Term Storage to the treatment train to then on to the drip disposal fields.

Type of Wastewater Disinfection

Area of Land Application Fenced

System Flows**What is the total flow of the facility in MGD?**

0.175

Flow Rates

Total flow is > 0.075 MGD

How many MGD over 0.075 MGD?

0.10

Total Flow is >0.075 MGD Fee

1750

Total Fee

1750

Attachments

Date	Attachment Name	Context	User
8/4/2026 3:47 PM	Appendix H Process Flow Diagram.pdf	Attachment	Garrad Johnson

Status History

Date	User	Processing Status
8/4/2026 3:03:23 PM	Garrad Johnson	Draft
8/6/2026 4:21:43 PM	Garrad Johnson	Signing
8/14/2026 5:21:26 PM	Jacob Freeman	Payment Due
8/17/2026 8:55:18 AM	Jacob Freeman	Submitting
8/17/2026 8:55:33 AM	Jacob Freeman	Submitted
8/17/2026 10:16:55 AM	Bryan W Pope	In Review
8/17/2026 10:58:08 AM	Bryan W Pope	Complete

Processing Steps

Step Name	Assigned To/Completed By	Date Completed
Form Submitted	Jacob Freeman	8/17/2026 8:55:33 AM
Admin Review	Bryan W Pope	8/17/2026 10:16:55 AM
Technical Review	Bryan W Pope	8/17/2026 10:58:07 AM
Submission Complete	Bryan W Pope	8/17/2026 10:58:07 AM

Agreements and Signature(s)

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Submission Agreements

- ☒ I am the owner of the account used to perform the electronic submission and signature.
- ☒ I have the authority to submit the data on behalf of the facility I am representing.
- ☒ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☒ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

Signed By

Jacob Freeman on 08/14/2026 at 5:21 PM

xfafP+2T7TBCozXjvyYVb0At5zTTYZLOkfWj+FsKG1Qk8pY2+EF2VVvLSm4VkcckKDbgQSiNaMBv
R8f4SI+uTlyA==

Wastewater Engineering Plans Submittal

version 1.18

(Submission #: HQQ-K0G9-GTY0C, version 2)

Details

Submitted 9/15/2026 (23 days ago) by Garrad Johnson

Submission ID HQQ-K0G9-GTY0C

Engineering Plans Troubadour/Hideaway WWTP

Status In Review

Fees

Fee \$500.00

Payments/Adjustments (\$500.00)

Balance Due \$0.00 (Paid)

Form Input

Project Information

Project Name

Troubadour/Hideaway WWTP

Project Description

Requesting a modification to the existing permitted capacity of 117,500 gpd to an increased capacity of 175,300 gpd. Proposed modification of existing treatment and drip fields to provide additional capacity to support future development within the Troubadour Subdivision.

Instructions for Project Description

Depending on project type, description should include but is not limited to:

- Linear feet, diameter, and type of force main, gravity sewer or low pressure sewer

- Proposed treatment process
- Treatment/storage/pumping capacity

For line rehabilitation, include: linear feet and size by activity, e.g., replacement, pipe-bursting, cured-in-place, slip-line, TV inspection, smoke testing; number of manhole or service lateral rehabs.

Is this submittal for a decentralized system that was reviewed by a Third-Party Qualified Water Resources Engineer registered with the Tennessee Department of Environment and Conservation Division of Water Resources?

No

Is this is a new treatment facility?

No

Select System Name

Cartwright Creek, LLC

Provide NPDES or SOP Number for the associated Treatment Facility

SOP-07090 - LIMESTONE WATER UTILITY OPERATING COMPANY, LLC - HIDEAWAY WASTEWATER TREATMENT FACILITY

County

Williamson (47187)

Project Location

6545 COX RD

COLLEGE GROVE, TN 37046-7108

Approximate Center of the Project

35.815194,-86.67697

Utility Information

Utility Contact Information**Prefix***NONE PROVIDED***First Name**

Jake

Last Name

Freeman

Title

Engineering Director

Utility Name

Central States Water Resources

Phone Type

Business

Number

314-222-4144

Extension**Email**

jfreeman@cswrgroup.com

Address

1630 DES PERES RD STE 140

DES PERES, MO 63131-1871

Is the Engineer of Record the same as the Utility Contact?

No

Is the collection system or the treatment facility that serves this project on a moratorium?

No

Will approved standard specifications be used for this project:

No

Engineer of Record

Engineering Contact**Prefix**

NONE PROVIDED

First Name

Garrad

Last Name

Johnson

Title

Project Engineer

Company Name

Inflo Design Group

Phone Type

Mobile

Number

6292646191

Extension**Email**

garrad.johnson@inflodesign.com

Address

7000 Executive Center Dr

Suite 250

Brentwood, TN 37027

Funding**Is a funding agency involved with this project?**

No

ARAP and CGP**Was a CGP NOI (Notice of Intent) submitted for this project?**

No

Check the appropriate box(es) if there are streams and/or wetlands on or adjacent to the construction site.

Streams

Is an ARAP application or NOI (Notice of Intent) required for this project?

No

Upload Files**Submission Instructions**

Please submit each file as its own document. If files are submitted as one giant document, TDEC may not accept the file. Engineering reports, calculations, final plans, and specifications must be signed by an engineer licensed in Tennessee.

Check one or more PDF files that will be submitted:

Preliminary Engineering Report
Preliminary Plans

Preliminary Engineering Report File

Troubadour WWTP Ph III Expansion PDR TDEC.pdf - 09/15/2026 04:30 PM

Comment

Please see revised PDR for updated square footages and loading rates. According to previous design information and SOP the Phase 1 areas appeared to have been designed with a loading rate of 0.27 gpd/sf. We have revised the area square footages to more accurately reflect as-built information for the Phase 1 Drip areas and are designating a loading rate of 0.25 gpd/sf for those existing areas.

CORRECTION REQUEST (CORRECTED)

Phase 1 Loading Rate

Design Criteria Chapter 17.1.4 states that the maximum loading rate is 0.25 gpd/sf. The listed loading of 0.27 gpd/sf is not able to be approved. Further, section 3.1 of the report alludes to a loading rate around 0.22 gpd/ft. The calculations must be revised to account for the proposed design loading for each field that supports the design flow in the permit application.

Created on 9/2/2026 9:14 AM by **Timothy Hill**

1 COMMENT

Garrad Johnson (garrad.johnson@inflodesign.com) (9/15/2026 4:43 PM)

Please see revised PDR for updated square footages and loading rates. According to previous design information and SOP the Phase 1 areas appeared to have been designed with a loading rate of 0.27 gpd/sf. We have revised the area square footages to more accurately reflect as-built information for the Phase 1 Drip areas and are designating a loading rate of 0.25 gpd/sf for those existing areas.

Preliminary Plans

Preliminary Plans.pdf - 09/15/2026 04:39 PM

Comment

Pit 4 is to not be included in the reserve areas at the treatment plant site. Additionally, I understand that Lonnie did not complete a full soil profile description for Pit 4 because rock was encountered.

CORRECTION REQUEST (CORRECTED)

Soils

It is noted that pit 4 is located in reserve area, however, the pedon description appears incomplete. Also note that several pits indicate moderately well drained soils and some hitting chroma 2 at 23 inches. These are still suitable soils according to Design Criteria Chapter 17, with a caution of potential seasonal saturation concerns.

Created on 9/2/2026 9:20 AM by **Timothy Hill**

1 COMMENT

Garrad Johnson (garrad.johnson@inflodesign.com) (9/15/2026 4:43 PM)

Pit 4 is to not be included in the reserve areas at the treatment plant site. Additionally, I understand that Lonnie did not complete a full soil profile description for Pit 4 because rock was encountered.

Calculating Fees

Wastewater Plant and/or Collection System Modifications

The plans review fee for modifications to wastewater plants and/or collection systems shall be 20% of the full fee based on the category and size of the resulting facility. Modifications include, but are not limited to: changes in plans prior to construction, single unit processes, rehabilitation (funding agency required review). The total review fee will be calculated based on selections and values provided below.

Wastewater Plants (Final Plans/Construction Documents)

Are you submitting engineering plans for the construction of a wastewater treatment plant?

No

Wastewater treatment plant engineering plans review fee

0.00

Engineering Report Review

Are you submitting an engineering report/preliminary plans for the design of a wastewater treatment plant?

Yes

Is the engineering report for an industrial treatment plant or for a sewage treatment plant?

Sewage Treatment (POTW)

For Engineering Report for the Sewage Treatment Facility, enter design flow in MGD

0.1753

Fee for Engineering Report Review

500

Collection Systems

Are you submitting engineering plans and calculations for design of a collection system?

No

Collection system line review fee

0

Equalization Basins

Are you submitting engineering plans and calculations for design of an Equalization Basin?

No

Equalization Basin Review Fee

0

Pumping Stations

Are you submitting engineering plans and calculations for the design of a pump station?

No

Pumping Station Review Fee

0

Total Fee

Total fee automatically calculated based on above given values.

Total Fee

500

Attachments

Date	Attachment Name	Context	User
9/15/2026 4:39 PM	Preliminary Plans.pdf	Attachment	Garrad Johnson
9/15/2026 4:30 PM	Troubadour WWTP Ph III Expansion PDR TDEC.pdf	Attachment	Garrad Johnson

Status History

Date	User	Processing Status
9/15/2026 4:29:34 PM	Garrad Johnson	Draft
9/15/2026 4:44:15 PM	Garrad Johnson	Submitting
9/15/2026 4:44:38 PM	Garrad Johnson	Submitted
9/15/2026 4:44:39 PM	Garrad Johnson	In Review

Processing Steps

Step Name	Assigned To/Completed By	Date Completed
None		

Revisions

Revision	Revision Date	Revision By
Revision 1	8/5/2026 10:13 AM	Garrad Johnson
Revision 2	9/15/2026 4:29 PM	Garrad Johnson

Certification Statement

This document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete.