

26-00070

From: [Sara Cisler](#)
To: [TNConsumerAdvocate](#)
Cc: [Sara Cisler](#)
Subject: Request for Consumer Advocate Review – TPUC Docket No. 24-00044 – Limestone Water Utility ERU Methodology
Date: Saturday, August 1, 2026 10:39:09 AM
Attachments: [Letter to TPUC re Limestone's Response to Cisler ERU Complaint w- attachment \(24-00044\).pdf](#)

Dear Consumer Advocate,

I am requesting your assistance regarding the sewer rate methodology approved for Limestone Water Utility in **TPUC Docket No. 24-00044 (Petition of Limestone Water Utility Operating Company, LLC to Increase Charges, Fees and Rates and for Approval of a General Rate Increase and Consolidated Rates [Phase 2 Increase])** and its application to seasonal single-family vacation homes in Lakeside Estates, LaFollette, Tennessee.

I own two detached single-family homes that are used as seasonal vacation rentals. Each home has a single residential sewer connection and remains vacant for significant portions of the year. Under Limestone's Commission-approved tariff, these homes are classified as commercial vacation rentals and assigned Equivalent Residential Units (ERUs) based solely on their maximum advertised guest capacity rather than their actual or seasonal use.

I understand that Limestone is applying the tariff as approved by the Commission. However, I respectfully question whether the tariff itself produces a fair and reasonable result for detached seasonal single-family homes.

In its response to my complaint, Limestone confirms that ERUs for vacation rentals are based on guest capacity rather than actual water usage, seasonal occupancy, or periods of vacancy. The utility also suggests that homeowners disconnect water service during periods when the property is not occupied if they wish to suspend sewer charges.

Respectfully, I do not believe this is a practical or equitable solution. Seasonal homes require ongoing access to water for routine maintenance, inspections, repairs, cleaning, contractor access, and periodic owner visits. Disconnecting and reconnecting water service each season is not a reasonable expectation for maintaining a home.

These properties remain single-family residences with one sewer connection, yet they are assessed sewer charges based on maximum advertised occupancy rather than the actual demand they place on the sewer system.

I understand that TPUC Consumer Services has received complaints from numerous homeowners in our neighborhood regarding this issue. After discussing my concerns with TPUC Consumer Services, I was encouraged to contact your office for further review.

I respectfully request that your office review whether the tariff methodology approved

in **TPUC Docket No. 24-00044** fairly serves consumers and whether a different classification or methodology should be considered for seasonal single-family vacation homes.

For your reference, I have attached Limestone Water Utility's response to my complaint.

Thank you for your time and consideration. I appreciate any guidance your office can provide and would be happy to provide any additional information that would assist your review.

Sincerely,

Sara Cisler

A solid black rectangular box used to redact the signature of Sara Cisler.



July 31, 2026

VIA ELECTRONIC MEANS

Stacey Balthrop, Director, Consumer Services
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: *Petition of Limestone Water Utility Operating Company, LLC to Increase Charges, Fees and Rates and for Approval of a General Rate Increase and Consolidated Rates [Phase 2 Increase], TPUC Docket No. 24-00044*

Dear Ms. Balthrop:

Limestone Water Utility Operating Company, LLC ("Limestone Water" or Company") is hereby responding to Sara Cisler's July 28, 2026, correspondence to the Tennessee Public Utility Commission ("TPUC" or "Commission"), which is attached for ease of reference. The Company reviewed the customer's concerns and, at the customer's request, conducted an evaluation of the property's Equivalent Residential Unit (ERU) assignment using the methodology set forth in its tariff. Based on that review, Limestone Water determined that the property is appropriately classified as a commercial customer because it is operated as a short-term vacation rental. Consistent with Appendix A of the tariff, commercial vacation rental properties are assigned ERUs based on guest capacity rather than actual water usage, seasonal occupancy, or periods of vacancy. The Company's review confirmed that the current ERU assignment is consistent with the tariff on file with the Commission and no adjustment is warranted.

Limestone Water has also contacted the customer and provided information regarding the seasonal service suspension process. Specifically, customers may request suspension of sewer service during periods when the property is not in use by providing documentation from the water utility demonstrating that water service has been disconnected or otherwise shut off for the applicable period. The Company remains willing to work with the customer should they wish to pursue that option. Based on the foregoing, Limestone Water believes the matter has been appropriately addressed.

As required, copies will follow. Should you have any questions concerning this filing or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP

Melvin J. Malone

Attachment

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Kelly Grams, TPUC General Counsel
Michelle Mairs, TPUC
Sara Cisler

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BUTLER SNOW LLP

24-00044

From: Sara Cisler <[REDACTED]>
Sent: Tuesday, July 28, 2026 4:24 PM
To: Contact TPUC <Contact.TPUC@tn.gov>
Subject: [EXTERNAL] Additional Public Comment – Docket 24-00044

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I previously submitted comments during this docket expressing concerns about the impact of the proposed rate changes. Since implementation, a separate concern has become apparent. The current ERU methodology for seasonal single-family vacation homes results in sewer charges based on maximum advertised occupancy rather than seasonal use.

My properties are detached single-family homes that are rented seasonally, have one sewer connection, and remain vacant for much of the year. However, they are assigned commercial ERUs based solely on maximum advertised guest capacity. This methodology produces sewer charges that do not reasonably reflect the seasonal nature of these homes.

I respectfully ask the Commission to review whether assigning ERUs based on maximum advertised occupancy is an appropriate methodology for seasonal single-family vacation homes and to consider a more equitable approach for this unique class of customer.

Thank you for your consideration.

Sara Cisler

[REDACTED]

Attachment 1

[REDACTED]

[REDACTED]