

August 17, 2026

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VIA ELECTRONIC FILING

Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

RE: *Petition of Limestone Water Utility Operating Company, LLC to Elect and Opt into an Annual Rate Review Mechanism and ARRM Tariff Pursuant to Tenn. Code Ann. § 65-5-103(d)(6), Docket No. 26-00070*

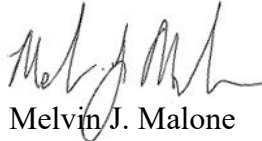
Dear Ms. Lawless:

Attached for filing please find *Limestone Water Utility Operating Company, LLC's Motion for Extension of Time to Respond to the Consumer Advocate's Motion to Dismiss* in the above-captioned matter.

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

clw

Attachment

cc: Russ Mitten, Limestone
Shilina Brown, Consumer Advocate Division
Vance Broemel, Consumer Advocate Division

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

**PETITION OF LIMESTONE WATER)
UTILITY OPERATING COMPANY,)
LLC TO ELECT AND OPT INTO AN)
ANNUAL RATE REVIEW)
MECHANISM AND ARRM TARIFF)
PURSUANT TO TENN. CODE ANN.)
§ 65-5-103(d)(6))**

DOCKET NO. 26-00070

**LIMESTONE WATER UTILITY OPERATING COMPANY, LLC’S
MOTION FOR EXTENSION OF TIME TO RESPOND TO
THE CONSUMER ADVOCATE’S MOTION TO DISMISS**

Pursuant to Rule 1220-01-02-.06(2) of the Tennessee Public Utility Commission’s Rules of Practice and Procedure, Limestone Water Utility Operating Company, LLC’s (“Limestone” or the “Company”) respectfully submits this Motion for Extension of Time to Respond to the Consumer Advocate’s Motion to Dismiss (“*Motion*”). For the reasons that follow, and for good cause shown, Limestone respectfully requests that the Commission grant its request.

I. ARGUMENT

On August 11, 2026, the Consumer Advocate submitted the *Motion* in this matter requesting the Commission to dismiss the *Petition* of Limestone for an Annual Rate Revenue Mechanism (“ARRM”). While the *Motion* is not lengthy, it does involve and concern significant issues that may have a substantial impact upon the Company. Further, after reviewing the *Motion*, Limestone reached out to the CAD in a cooperative and good faith attempt to explore and evaluate potential mutually satisfactory alternatives that would either moot or hold in abeyance the *Motion*. Limestone learned today that its efforts have not resulted in a mutually satisfactory resolution of the *Motion*.

The Commission often encourages parties in contested cases to attempt cooperative resolutions before and after filing various motions and responses. Sometimes, meaningful and good faith attempts at substantive resolutions take time and resources. Under the circumstances presented, Limestone believes this motion for extension of time is well-grounded and reasonable. Limestone's good faith attempts at a meaningful resolution of the *Motion*, coupled with the passage of time associated with such discussions, should not prejudice its ability to prepare a substantive response on a dispositive motion. Otherwise, parties could be reluctant to engage in attempts at such conferral on prehearing motions, which will likely only further burden the administrative process. The Commission's rules grant a party opposing a motion seven (7) days to respond and expressly provides that "[t]he Commission, or Hearing Officer may shorten or extend the time for responding to any motion."¹

II. CONCLUSION

For the foregoing reasons, Limestone respectfully requests that the Commission grant it an additional seven days until 2:00 p.m. on August 25, 2026, to respond to the *Motion*.

This the 17th day of August 2026.

Respectfully submitted,



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Company, LLC*

¹ Rule 1220-01-02-.06 (2) of the Tennessee Public Utility Commission's Rules of Practice and Procedure.

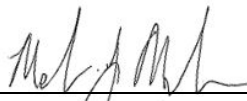
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Vance Broemel, Esq.
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
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Shilina B. Brown, Esq.
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Shilina.Brown@ag.tn.gov

This the 17th day of August, 2026.



Melvin Malone