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Paul T. Diskin
Manager
Rates & Regulation

December 3, 2004

Randall L. Nelson, City Attorney
City of Chattanooga
Nelson, McMahan & Noblett
801 Broad Street, Suite 400
Chattanooga, TN 37402

**RE: Interrogatories and Requests for Production of Documents by the City of
Chattanooga (First Set) To Tennessee-American Water Company
Rate Case No. 04-00288**

Dear Mr. Nelson:

Enclosed is a copy of the above Interrogatories Question 2 and a revised answer to Question 3 for Tennessee American's petition to increase rates which was filed on September 10, 2004.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul T. Diskin".

Paul T. Diskin

Enclosures

Cc.

M. Miller w/enclosures
S. Dillon w/enclosures
T. Phillips w/enclosures
D. Grimes w/enclosures
H. Walker w/enclosures

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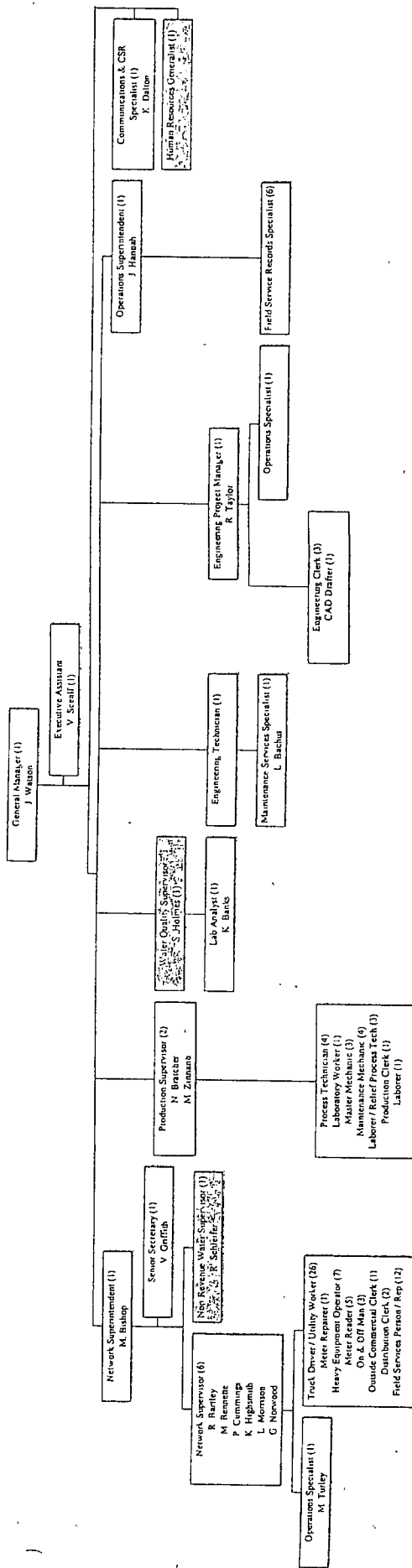


**Interrogatories and Requests for Production
Of Documents by the Staff of the
City of Chattanooga (First Set)
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2. Q WHAT POSITIONS AND JOB RESPONSIBILITIES HAVE BEEN ELIMINATED FROM THE CHATTANOOGA OFFICE AND EXPLAIN HOW THE FUNCTIONS FORMERLY PERFORMED BY THESE EMPLOYEES WILL BE PERFORMED IN THE NEW ORGANIZATION PLEASE PRODUCE A BEFORE-AND-AFTER LIST OF TAWC EMPLOYEES BY POSITION.

A Please refer to the attached schedules. The first schedule is a listing of position from the previous rate filing and the positions that were eliminated. The second schedule is the current organizational chart for Tennessee American

American Water
Southeast Region
Tennessee American Water



Positions in shaded blocks represent Tennessee American Water employees who will also provide service to other American Water companies

	Previous Rate Case Position Title	Current Rate Case	Change in duties or duties eliminated
1 L'Ecuver	President	Watson	Vice President and General Network Manager (VP & GNM No change in duties oversee Network and Production functions added duties from Business Manager for rate filings testimony and data requests
2 Bailey	Business Manager	XXX	Position eliminated Duties being split between VP & GNM Financial Operations Supervisor Network Superintendent and SE Region Rate Department
3 Bishop	Operations Manager	Bishop	Network Superintendent No change in duties except added responsible for responding to customer complaints and first contact for loss control
4 Schleifer	Operations Superintendent-Dist	XXX	Position eliminated Duties now included in duties performed by Network Superintendent
5 Loftin	Communications Manager	XXX	Position eliminated Duties shared by Communications Specialist and SE Region Communications Manager
6 Dalton	Communications Specialist	Dalton	Communications Specialist Duties added include External Affairs Corp Social Responsibility Employee Communications
7 Turley	Operations Supervisor-Dist	Highsmith	Network Operations Supervisor Increased coverage from 25% service area network maintenance and 25% of service area service installs to 50% of service area maintenance only
8 Bennette	Operations Supervisor-Dist	Bennette	Network Operations Supervisor Increased coverage from 25% service area network maintenance and 25% of service area service installs to 50% of service area maintenance only
9 Janow	Operations Supervisor-Dist	Norwood	Network Operations Supervisor Responsible for 100% service installations for entire service area and programmed maintenance functions in Network
10 Cummings	Business Development Specialist	Cummings	Network Operations Supervisor (Financial) Assumed financial and budgeting aspects of Business Manager position
11 Walker	Operations Supervisor Dist	XXX	Position eliminated Was responsible for service installs and 25% of service area maintenance-reassigned above
12 Stanley	Operations Supervisor Dist	XXX	Position eliminated Was responsible for service installs and 25% of service area maintenance-reassigned above
13 Zinnanti	Production Superintendent	Turley	Network Operations Specialist Was responsible for programmed maintenance reassigned to above-Specialist completes paperwork and purchasing receiving and inventory management
14 Haddock	Computer Support Specialist	Zinnanti	Production Supervisor Duties did not materially change Responsible for treatment facilities production maintenance personnel covers for other Prod Supvr
15 Bratcher	Production Supervisor	Haddock	Computer Support Specialist Duties reassigned to production supervisors above
16 Harris	Operations Supervisor (Prod Maint)	Bratcher	Production Supervisor Duties are being split between Network Ops Supervisors below
17 Hannah	Operations Superintendent-Comm	XXX	Position eliminated Duties related to customer service are largely being absorbed by Centralized Call Center allowing time to assume duties associated with Service Personnel and Meter Shop
18 Bartley	Customer Service Superintendent	Bartley	Network Operations Supervisor Duties related to customer service are largely being absorbed by Centralized Call Center allowing time to assume duties associated with Service Personnel and Meter Shop
19 Herndon	Customer Service Supervisor	Morrison	Network Operations Supervisor Duties related to meter reading and service orders absorbed by Network Ops Supvrs Bartley and Morrison
20 Norwood	Customer Service Supervisor	XXX	Position combined with Network Ops Supervisor Duties related to meter reading and service orders absorbed by Network Ops Supvrs Bartley and Morrison
21 Bannington	Operations Specialist(Inspector)	XXX	Position eliminated Pipeline inspection contracted to local engineering firms
22 Scheldt	Human Resource Manager	XXX	Human Resource Generalist work in this position performed by Service Company personnel
23 Sealf	Executive Assistant	Sealf	Executive Assistant No change in position
24 Taylor	Operations Engineer	Taylor	Senior Project Manager Duties largely unchanged however this position is now responsible for Investment Budget tracking and expenditure reporting, also assumes direct reporting of eng personnel
25 Bachus	Maint Service Specialist	Bachus	Cross Connection Specialist Duties are unchanged
26 Griffith	Senior Secretary	Griffith	Senior Secretary Duties remain as before
27 McCord	Office Supervisor Engineering	Griffith	Engineering Technician Duties remain similar to Ops Supvr however more technically trained for field experience less office management
28 Holmes	Water Quality Superintendent	Holmes	Water Quality Supervisor Duties are same as before except additional responsibility for Environmental compliance Reporting
29 Banks	Laboratory Analyst	Banks	Laboratory Analyst Duties principally the same as before, fewer analyses
30 Ortega	Laboratory Analyst	XXX	Position eliminated Belleville Lab performing more analyses local company no longer performing certain tasks
31 Durham	Laboratory Analyst	XXX	Position eliminated Belleville Lab performing more analyses local company no longer performing certain tasks
32 Blevins	Operations Supervisor-Dist	Schleifer	Non-Revenue Water Supervisor Additional duties associated with leak survey and leak detection
33 Frazier	Operations Supervisor	XXX	Position eliminated Supervised meter repair on & off and night shift field reps
34 Caudle	Customer Service Supervisor	XXX	Position eliminated Duties related to customer service are largely being absorbed by Centralized Call Center allowing time to assume duties associated with Service Personnel and Meter Shop
35 McAfee	Human Resource Specialist	XXX	Position eliminated Human resources duties will remain largely unchanged

7 Heavy Equipment Operator	7
21 Dump Truck Driver/Utility Worker	26
1 Off Shift Utility Worker	0
3 Utility Worker	1
7 On & Off	3
0 Laborer	0
3 Field Service Representative	12
0 Field Representative	0
10 Meter Readers	5
3 Meter Repairer	1
3 Engineering Clerk	3
3 Distribution Clerk	2
2 Outside Comm Clerk	1
1 Production Clerk	1
0 Accounting Clerk	0
14 Customer Service Representative	6
4 Process Technicians	4
2 Laborer/Relief Process Technician	3
1 Relief Process Technician in Training	0
2 Master Maintenance Mechanics	3
5 Maintenance Mechanics	4
3 Production Laborer	1
1 CAD Drafter	1
1 Laboratory Worker	1
97 Bargaining Unit	85
	106

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REVISED

3 Q WHAT THIRD PARTY ENTITY WILL DETERMINE ELIGIBILITY FOR
THE TWENTY-FIVE PERCENT SERVICE CHARGE DISCOUNT?

A. Dollar Energy will be used to determine the eligibility of customers. They are currently being used for that same purpose for Pennsylvania American Kentucky American customers.