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February 14, 2007

VIA HAND-DELIVERY

Chairman Sara Kyle
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Petition Of Tennessee American Water Company To Change And Increase Certain Rates And Charges So As To Permit It To Earn A Fair And Adequate Rate Of Return On Its Property Used And Useful In Furnishing Water Service To Its Customers; Docket No. 06-00290

Dear Chairman Kyle:

Enclosed please find an original and sixteen (16) copies of Tennessee American Water Company's Supplemental Response to City of Chattanooga's First Discovery Requests dated January 22, 2007.

Please return two copies of the Responses, which I would appreciate your stamping as "filed," and returning to me by way of our courier.

Please note that the Company is still working on preparing the responses to Questions 18, 19, and 24, and they are not included in this filing. They will be filed and served as soon as they are completed.

Should you have any questions concerning any of the enclosed, please do not hesitate to contact me.

With kindest regards, I remain

Yours very truly,



R. Dale Grimes

RDG/ms
Enclosures

Chairman Sara Kyle
February 14, 2007
Page 2

cc: Hon. Pat Miller (*w/o enclosure*)
Hon. Ron Jones (*w/o enclosure*)
Hon. Eddie Roberson (*w/o enclosure*)
Ms. Darlene Standley, Chief of Utilities Division (*w/o enclosure*)
Richard Collier, Esq. (*w/o enclosure*)
Mr. Jerry Kettles, Chief of Economic Analysis & Policy Division (*w/o enclosure*)
Ms. Pat Murphy (*w/o enclosure*)
Michael A. McMahon, Esq. (*w/enclosure*)
Frederick L. Hitchcock, Esq. (*w/enclosure*)
Vance Broemel, Esq. (*w/enclosure*)
Henry Walker, Esq. (*w/enclosure*)
David Higney, Esq. (*w/enclosure*)
Mr. John Watson (*w/o enclosure*)
Mr. Michael A. Miller (*w/o enclosure*)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

PETITION OF TENNESSEE AMERICAN	)	
WATER COMPANY TO CHANGE AND	)	
INCREASE CERTAIN RATES AND CHARGES	)	
SO AS PERMIT IT TO EARN A FAIR AND	)	
ADEQUATE RATE OF RETURN ON ITS	)	Docket No. 06-00290
PROPERTY USED AND USEFUL IN	)	
FURNISHING WATER SERVICE TO ITS	)	
CUSTOMERS	)	

**TENNESSEE AMERICAN WATER COMPANY'S SUPPLEMENTAL RESPONSES TO
CITY OF CHATTANOOGA'S FIRST DISCOVERY REQUESTS**

The Tennessee American Water Company, while expressly reserving its prior objections, hereby provides the following supplemental responses to the First Discovery Requests from the City of Chattanooga:

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "R. Dale Grimes", written over a horizontal line.

R. Dale Grimes (#6223)

J. Davidson French (#15442)

Ross I. Booher (#019304)

BASS, BERRY & SIMS PLC

315 Deaderick Street, Suite 2700

Nashville, TN 37238-3001

(615) 742-6200

Counsel for Petitioner

Tennessee American Water Company

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1, 2, 13

SUPPLEMENTAL RESPONSE

Responsible Witness: Michael Miller

Supplemental Response to COC Questions 1, 2, and 13:

Attached are schedules used in case number 03-00118 in support of the savings generated from the call center, the employees impacted by the transition at TAWC, and the customer service employees embedded in the historical test-year for that case, along with their salaries or hourly rates of pay. The attached schedules filed in that case were either exhibits to the testimony of Michael Miller, or in the workpapers filed with the case, and are a part of the public record in that case.

The Call Center Costs for 2004-2006 are as follows:

2004 - \$782,034

2005 - \$773,218

2006 - \$866,606

TENNESSEE-AMERICAN WATER COMPANY
 CUSTOMER SERVICE POSITIONS ELIMINATED
 BY CALL CENTER - PAYROLL (APRIL, 2003 - JUNE, 2003)

NO.	ADDRESS	EMPLOYEE NAME	APRIL - JUNE '03 WAGE RATE	TOTAL EFFECTIVE HOURS	EFFECTIVE HOURS APRIL - JUNE '03	ATTRITION YEAR WAGES TOTAL	SUBJECT TO FICA	BASE PAY	PAYROLL CODE	1-ANNUAL 2-TERM 3-NEW OR REPLACE.	FULL TIME EMPLOYEE COUNT
1	26000060	Cotton, Marilyn D.	16.96	1,552.0	388.0	8,853	8,853	8,853	28	1	1
2	26000027	Freeman, Patricia A.	16.96	2,029.8	507.4	8,606	8,606	8,853	28	0	1
3	26000100	Head, Nancy S.	16.96	2,095.0	523.8	8,884	8,884	8,853	28	0	1
4	26000101	Henderson, Frank W.	16.96	2,059.0	514.8	8,731	8,731	8,853	28	0	1
5	26000113	Jacobs, Margaret R.	16.96	2,101.1	525.3	8,909	8,909	8,853	28	0	1
6	26000073	Jones, Erleen W.	16.96	2,101.9	525.5	8,912	8,912	8,853	28	0	1
7	26000112	Kelley, Myra V.	16.96	2,049.3	512.3	8,689	8,689	8,853	28	0	1
8	26000105	Tawater, Melanie R.	16.96	2,092.0	523.0	8,870	8,870	8,853	28	0	1
9	26000117	Williams, Faye J.	16.96	2,127.8	531.9	9,021	9,021	8,853	28	0	1
10	26000149	Williams, K. Denise	16.96	2,091.1	522.8	8,867	8,867	8,853	28	0	1
11	26000140	Smith, Sandra L.	16.96	2,096.0	524.0	8,887	8,887	8,853	28	0	1
				0.0	0.0	0	0	0			
				0.0	0.0	0	0	0			

TOTAL 22,394.9 5,598.8 97,229 97,229 97,383 11

TENNESSEE-AMERICAN WATER COMPANY
CUSTOMER SERVICE EMPLOYEES - CHATTANOOGA

AUTHORIZED LEVEL - 17

	ADDRESS	EMPLOYEE NAME	PAYROLL IN CASE	TEST YEAR WAGES		U-UNION S-SALARY	TEST YEAR REGULAR		POSITION
				TOTAL	HOURS		HOURS		
1	26000028	Bartley, Rachel M.	84,048	81,295		S			Customer Service Superintenden
2	26000075	Herndon, J. Monty	56,547	54,556		S			Customer Service Supervisor
3	26000184	Caudle, Elizabeth L.	62,676	59,470		S			Customer Service Supervisor
4	26000060	Cotton, Marilyn D.	0	26,412		U	1,552.00		Customer Service Representative
5	26000027	Freeman, Patricia A.	0	34,373		U	2,029.00		Customer Service Representative
6	26000100	Head, Nancy S.	0	35,442		U	2,080.00		Customer Service Representative
7	26000101	Henderson, Frank W.	0	35,380		U	2,056.00		Customer Service Representative
8	26000113	Jacobs, Margaret R.	0	35,544		U	2,088.00		Customer Service Representative
9	26000073	Jones, Erleen W.	0	35,556		U	2,088.00		Customer Service Representative
10	26000112	Kelley, Myra V.	0	34,689		U	2,036.50		Customer Service Representative
11	26000105	Tawater, Melanie R.	0	35,529		U	2,078.50		Customer Service Representative
12	26000179	Butcher, Judith B. (Thomas)	36,816	37,575		U	2,088.00		Customer Service Representative
13	26000117	Williams, Faye J.	0	36,034		U	2,085.75		Customer Service Representative
14	26000149	Williams, K. Denise	0	35,378		U	2,087.75		Customer Service Representative
15	26000086	Millsaps, Cheryl B.	36,447	37,693		U	2,087.50		Customer Service Representative
16	26000140	Smith, Sandra L.	0	35,460		U	2,077.25		Customer Service Representative
17	26000087	Hudson, Chris W	0	20,196		U	1,178.25		Resigned April 2002
18	26000152	Steed, Cynthia A.	41,219	37,313		U	2,086.00		Meter Reader
19	26000078	Morrison, Leah T.	41,859	37,401		U	2,085.00		Field Services Representative
Total				745,296					
Less: Employees in Case				270,586					
Test Year Wages of Employees to be eliminated				474,707					
Less: Employees in Case and those moved to other positions				345,303					
Test Year Wages of Employees to be eliminated				399,993					

TENNESSEE-AMERICAN WATER COMPANY
COMPARISON OF ANNUAL COST FOR THE CONVERSION
TO A CONSOLIDATED CALL CENTER AND "SHARED SERVICES" CENTER

CONSOLIDATED TELEPHONE CALL CENTER ("CTC")

Forecasted annual cost for operating the CTC	\$616,858
Plus Amortization of the transition cost	87,262
Total Cost for CTC	<u>\$704,120</u>
To reflect the elimination of 12 positions Plus overhead at TAWC	(662,609)
To eliminate temporary positions	(51,057)
To eliminate various O & M expenses-base year 12 months ended July 31, 2002	(34,976)
Total Cost eliminated	<u>(748,642)</u>
Annual cost (savings) due to conversion to consolidated call center	<u>(\$44,522)</u>

SHARED SERVICES CENTER ("SS")

Forecasted TAWC annual cost from the SS	\$338,526
Plus Amortization of the transition cost	35,948
Forecasted TAWC annual finance department cost from the Southeast Region	111,359
Total cost for SS and finance function	<u>485,833</u>
To reflect the elimination of 4 positions Plus overhead at TAWC	(264,057)
To eliminate regional accounting functions - Marlton office	(372,246)
Total Cost eliminated	<u>(636,303)</u>
Annual cost (savings) due to conversion to consolidated shared services center	<u>(\$150,470)</u>

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1, 2, 13

SUPPLEMENTAL RESPONSE

Responsible Witness: Michael Miller

Supplemental Response to COC Questions 1, 2, and 13:

Attached are schedules used in case number 03-00118 in support of the savings generated from the call center, the employees impacted by the transition at TAWC, and the customer service employees embedded in the historical test-year for that case, along with their salaries or hourly rates of pay. The attached schedules filed in that case were either exhibits to the testimony of Michael Miller, or in the workpapers filed with the case, and are a part of the public record in that case.

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				0.0	0.0	0	0	0			
				0.0	0.0	0	0	0			
TOTAL				22,394.9	5,598.8	97,229	97,229	97,383			11

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TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1
Questions 11, 14, and 15

SUPPLEMENTAL RESPONSE

Responsible Witness: John Watson/Michael Miller

Question:

11. ***Explain*** any addition, subtraction, acceleration, delay, deferral, or change in any recommended capital improvement projects identified in any Comprehensive Planning Study completed or dated since January 1, 1993.

Response:

TAWC objects to this question on the grounds that the requested information is overly burdensome, overly broad, and is not relevant to this case. Notwithstanding the objection, please see the response to question 10.

Supplemental Response:

Attached is a file that provides a list of Investment Projects ("IP's") from 2001-2006. The first two columns on the left of the schedule provide the IP number and page reference to the 2000 CPS, including page numbers. The last column on the right of the schedule provides comments on the status of each of the projects and whether action remain and are scheduled for 2007 to complete the project or to begin design and construction. As further reference, a summary list of the "Chattanooga Service Area-Recommended Projects" can be found at Table E-1 of the CPS, which is the last page of Executive Summary of the CPS.

Tennessee American Water Co.

Company/State

Units = \$

By Year in Which Expenditure Booked											
CPS Page #	CPS Project or IP Memorandum	Brief Description of Proposed Expenditures	Total 2001 thru 2006	Total 2001	Total 2002	Total 2003	Total 2004	Total 2005	Total 2006	Comments, Project Status	
8-21	IP20020101	West 1100' 12' Main St. Battery Cells and 2,300' 12' in Lee Highway	179,246	255,857	28,144	122,828	160,248	5	5	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-22	IP20020102	Customer Service System	45,144	85,037	28,144	122,828	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-23	IP20020103	Customer Service Efficiency Proj	2,550,896	771,567	813,346	1,228,828	38,140	227,367	181,551	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-19	IP 02-03 A-B	East Ridge Zone Storage and Pipeline	48,152	6,058	0	0	0	227,367	181,551	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-20	IP 02-03	Security Physical Hardening and Accessory Lighting	1,485,452	0	0	0	650,895	19,588	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-21	IP 02-02	TDOOT - ITS Signal Mt. Rd. Military Valley Rd	4,587,010	0	884,722	410,188	254,662	13,347	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-22	IP 02-01	Western Ridge Utility District Lines Extension	4,587,010	0	0	0	165,177	254,662	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-23	IP 02-01	TDOOT Highway Project	1,485,452	0	0	0	165,177	254,662	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-24	IP 02-01	Chattanooga Treatment Plant Evaluation and Design Concept	1,485,452	0	0	0	165,177	254,662	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-25	A-1	Pre-treatment Facility Improvements	1,485,452	0	0	0	165,177	254,662	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-26	A-2	Pilot Volume Test Improvements	1,485,452	0	0	0	165,177	254,662	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-27	A-3	WTP Improvements, Ammoniation Facilities	1,485,452	0	0	0	165,177	254,662	13,347	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-28	IP 04-02 B-A-1	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-29	A-4	Construct East Ridge Reservoir 75 Purged Storage	0	0	0	0	0	0	0	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-30	A-5	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-31	B-1	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-32	B-2	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-33	B-3	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-34	B-4	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-35	B-5	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-36	B-6	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-37	B-7	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-38	B-8	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-39	B-9	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-40	B-10	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-41	B-11	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-42	B-12	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-43	B-13	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-44	B-14	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-45	B-15	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-46	B-16	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-47	B-17	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-48	B-18	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-49	B-19	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-50	B-20	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-51	B-21	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-52	B-22	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-53	B-23	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-54	B-24	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-55	B-25	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-56	B-26	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-57	B-27	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-58	B-28	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-59	B-29	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-60	B-30	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-61	B-31	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-62	B-32	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-63	B-33	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-64	B-34	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-65	B-35	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-66	B-36	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-67	B-37	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-68	B-38	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-69	B-39	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-70	B-40	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-71	B-41	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-72	B-42	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-73	B-43	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-74	B-44	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-75	B-45	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-76	B-46	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-77	B-47	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-78	B-48	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-79	B-49	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-80	B-50	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-81	B-51	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-82	B-52	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-83	B-53	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-84	B-54	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-85	B-55	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-86	B-56	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-87	B-57	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-88	B-58	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-89	B-59	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-90	B-60	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-91	B-61	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-92	B-62	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-93	B-63	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-94	B-64	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-95	B-65	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-96	B-66	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-97	B-67	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-98	B-68	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-99	B-69	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-100	B-70	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-101	B-71	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-102	B-72	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-103	B-73	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-104	B-74	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-105	B-75	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-106	B-76	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-107	B-77	Construct 1.0 MG Tank - 48 Day Pressure Zone	1,796,120	0	0	0	3,761	1,722	1,722	Completed projects 2001 and 2004 in coordination with TDOOT project schedule	
8-108	B-78	Construct 1.0 MG Tank - 48 Day Pressure									

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1, 2, 13

SUPPLEMENTAL RESPONSE

Responsible Witness: Michael Miller

Supplemental Response to COC Questions 1, 2, and 13:

Attached are schedules used in case number 03-00118 in support of the savings generated from the call center, the employees impacted by the transition at TAWC, and the customer service employees embedded in the historical test-year for that case, along with their salaries or hourly rates of pay. The attached schedules filed in that case were either exhibits to the testimony of Michael Miller, or in the workpapers filed with the case, and are a part of the public record in that case.

The Call Center Costs for 2004-2006 are as follows:

2004 - \$782,034

2005 - \$773,218

2006 - \$866,606

TENNESSEE-AMERICAN WATER COMPANY
 CUSTOMER SERVICE POSITIONS ELIMINATED
 BY CALL CENTER - PAYROLL (APRIL, 2003 - JUNE, 2003)

NO.	ADDRESS	EMPLOYEE NAME	APRIL - JUNE '03 WAGE RATE	TOTAL EFFECTIVE HOURS	EFFECTIVE HOURS APRIL - JUNE '03	ATTRITION YEAR WAGES TOTAL	SUBJECT TO FICA	BASE PAY	PAYROLL CODE	1-ANNUAL 2-TERM. 3-NEW OR REPLACE.	FULL TIME EMPLOYEE COUNT
1	26000060	Cotton, Marilyn D.	16.96	1,552.0	388.0	8,853	8,853	8,853	28	1	1
2	26000027	Freeman, Patricia A.	16.96	2,029.8	507.4	8,606	8,606	8,853	28	0	1
3	26000100	Head, Nancy S.	16.96	2,095.0	523.8	8,884	8,884	8,853	28	0	1
4	26000101	Henderson, Frank W.	16.96	2,059.0	514.8	8,731	8,731	8,853	28	0	1
5	26000113	Jacobs, Margaret R.	16.96	2,101.1	525.3	8,909	8,909	8,853	28	0	1
6	26000073	Jones, Erleen W.	16.96	2,101.9	525.5	8,912	8,912	8,853	28	0	1
7	26000112	Kelley, Myra V.	16.96	2,049.3	512.3	8,689	8,689	8,853	28	0	1
8	26000105	Tawater, Melanie R.	16.96	2,092.0	523.0	8,870	8,870	8,853	28	0	1
9	26000117	Williams, Faye J.	16.96	2,127.8	531.9	9,021	9,021	8,853	28	0	1
10	26000149	Williams, K. Denise	16.96	2,091.1	522.8	8,867	8,867	8,853	28	0	1
11	26000140	Smith, Sandra L.	16.96	2,096.0	524.0	8,887	8,887	8,853	28	0	1
				0.0	0.0	0	0	0			
				0.0	0.0	0	0	0			
TOTAL				22,394.9	5,598.8	97,229	97,229	97,383			11

TENNESSEE-AMERICAN WATER COMPANY
CUSTOMER SERVICE EMPLOYEES - CHATTANOOGA

AUTHORIZED LEVEL - 17

	ADDRESS	EMPLOYEE NAME	PAYROLL IN CASE	TEST YEAR WAGES TOTAL	U-UNION S-SALARY	TEST YEAR REGULAR HOURS	POSITION
1	26000028	Bartley, Rachel M.	84,048	81,295	S		Customer Service Superintenden
2	26000075	Herndon, J. Monty	56,547	54,556	S		Customer Service Supervisor
3	26000184	Caudle, Elizabeth L.	62,676	59,470	S		Customer Service Supervisor
4	26000060	Cotton, Marilyn D.	0	26,412	U	1,552.00	Customer Service Representative
5	26000027	Freeman, Patricia A.	0	34,373	U	2,029.00	Customer Service Representative
6	26000100	Head, Nancy S.	0	35,442	U	2,080.00	Customer Service Representative
7	26000101	Henderson, Frank W.	0	35,380	U	2,056.00	Customer Service Representative
8	26000113	Jacobs, Margaret R.	0	35,544	U	2,088.00	Customer Service Representative
9	26000073	Jones, Erleen W.	0	35,556	U	2,088.00	Customer Service Representative
10	26000112	Kelley, Myra V.	0	34,689	U	2,036.50	Customer Service Representative
11	26000105	Tawater, Melanie R.	0	35,529	U	2,078.50	Customer Service Representative
12	26000179	Butcher, Judith B. (Thomas)	36,816	37,575	U	2,088.00	Customer Service Representative
13	26000117	Williams, Faye J.	0	36,034	U	2,085.75	Customer Service Representative
14	26000149	Williams, K. Denise	0	35,378	U	2,087.75	Customer Service Representative
15	26000086	Millsaps, Cheryl B.	36,447	37,693	U	2,087.50	Customer Service Representative
16	26000140	Smith, Sandra L.	0	35,460	U	2,077.25	Customer Service Representative
17	26000087	Hudson, Chris W	0	20,196	U	1,178.25	Resigned April 2002
18	26000152	Steed, Cynthia A.	41,219	37,313	U	2,086.00	Meter Reader
19	26000078	Morrison, Leah T.	41,859	37,401	U	2,085.00	Field Services Representative
Total				745,296			
Less: Employees in Case				270,589			
Test Year Wages of Employees to be eliminated				474,707			
Less: Employees in Case and those moved to other positions				345,303			
Test Year Wages of Employees to be eliminated				399,993			

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TENNESSEE-AMERICAN WATER COMPANY
COMPARISON OF ANNUAL COST FOR THE CONVERSION
TO A CONSOLIDATED CALL CENTER AND "SHARED SERVICES" CENTER

CONSOLIDATED TELEPHONE CALL CENTER ("CTC")

Forecasted annual cost for operating the CTC	\$616,858	
Plus Amortization of the transition cost	87,262	
Total Cost for CTC		<u>\$704,120</u>
To reflect the elimination of 12 positions Plus overhead at TAWC	(662,609)	
To eliminate temporary positions	(51,057)	
To eliminate various O & M expenses-base year 12 months ended July 31, 2002	(34,976)	
Total Cost eliminated		<u>(748,642)</u>
Annual cost (savings) due to conversion to consolidated call center		<u>(\$44,522)</u>

SHARED SERVICES CENTER ("SS")

Forecasted TAWC annual cost from the SS	\$338,526	
Plus Amortization of the transition cost	35,948	
Forecasted TAWC annual finance department cost from the Southeast Region	111,359	
Total cost for SS and finance function		<u>485,833</u>
To reflect the elimination of 4 positions Plus overhead at TAWC	(264,057)	
To eliminate regional accounting functions - Marlton office	(372,246)	
Total Cost eliminated		<u>(636,303)</u>
Annual cost (savings) due to conversion to consolidated shared services center		<u>(\$150,470)</u>

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1

SUPPLEMENTAL RESPONSE

Responsible Witness: Michael Miller

Question:

16. For each Capital Expense identified in response to Question 14, ***identify*** all amounts paid to any ***TAWC Parent or Affiliate***, state the date of each such payment, and provide all ***Documents*** reflecting, recording, referring to, reporting, or relating to each such payment to a ***TAWC Parent or Affiliate***.

Response:

Supplemental Response:

See the attached schedule which details affiliate charges by work order.

Capitalized Svc Co Transactions Billed to TN for 2005 through Jan 2007.

Formula or Work Order	Description	2005 Jan	2005 Feb	2005 Mar	2005 Apr	2005 May	2005 Jun	2005 Jul	2005 Aug	2005 Sep	2005 Oct	2005 Nov	2005 Dec	2005 Total	2006 Jan
100010	CP-CAPEX	\$ 2,565	\$ 1,331	\$ 1,321	\$ 1,761	\$ 1,591	\$ 3,289	\$ 1,945	\$ 943	\$ 1,053	\$ 1,468	\$ 912	\$ 1,212	\$ 19,390	\$ 991
100058	SE-CAPEX	\$ 9,040	\$ (8,365)	\$ 8,108	\$ 3,513	\$ 3,482	\$ 8,381	\$ 4,462	\$ 5,543	\$ 5,319	\$ 4,393	\$ 5,371	\$ 6,873	\$ 56,120	\$ (1,531)
100059	SE-CAPEX-NO O/H	\$ 3,416	\$ 6	\$ 41	\$ 122	\$ 180	\$ 324	\$ 609	\$ 385	\$ 134	\$ 57	\$ 228	\$ 229	\$ 2,314	\$ 405
100103	TN 2004 RATE CASE AU0185	\$ 3,298	\$ 1,780	\$ 729	\$ 1,321	\$ 1,369	\$ 1,813	\$ 1,548	\$ 1,452	\$ 1,252	\$ 1,336	\$ 1,391	\$ 68	\$ 17,357	\$ 2,302
100110	CAP PROG MGT/ASSET PLAN AU0221		\$ 248											\$ 248	
100111	SUPPLY CHAIN CAPEX-ALL REG'S													\$ 6,265	
100122	VOICE RECOGNITION AU0380													\$ 6,265	
100139	STEP-MANAGEMENT AU0440													\$ 69,018	\$ (3,076)
100144	STEP-EAM2 T&D MAXIMO AU0506													\$ 716	
100145	STEP-EAM1 PLANT MAXIMO AU0507													\$ 5,701	\$ 122
100146	STEP-GAU0508													\$ 14,196	\$ 0
100147	STEP-TAX/FA MGMT AU0509													\$ 48,662	\$ 22,407
100148	STEP-FICO AU0510													\$ 29,505	\$ 11,625
100149	STEP-HRIS AU0511													\$ 21,978	\$ 12,003
100150	STEP-MATERIAL MGMT AU0512													\$ 0	
100151	STEP-INVENTORY BAR CODE AU0513													\$ 13,823	\$ (1,151)
100152	STEP-REGCCS AU0514													\$ 11,654	\$ (2,155)
100153	STEP-WO DIAGNOSTIC AU0515													\$ 55,668	\$ (13,716)
100154	STEP-BUS INFORMATION AU0516													\$ 25,722	\$ (1,927)
100155	STEP-PORTAL AU0517													\$ 13,904	\$ 628
100156	STEP-BUS INTELLEGENCE AU0518													\$ 27	
100157	STEP-EAI AU0519													\$ 46,358	\$ (191)
100158	STEP-DOCUMENT MGMT AU0520													\$ (5,415)	\$ (12)
100159	STEP-SERVICE FIRST AU0521													\$ 2,484	\$ 87
100160	STEP-MDSI PHASE 3 AU0522													\$ 353	\$ 5
100161	STEP-SCADA DATA WHSE AU0523													\$ 383	\$ 44
100563	CO 26 (TN) Direct Charge CAPEX													\$ 3,187	\$ 328
100590	FAIL ONLY ORIEN PIPE ASM STUDY													\$ 0	\$ 0
100591	AUTO METER READING MGT STUDY													\$ 2	\$ 4
100595	SUPPLY CHAIN SE-CAPEX ALL REG													\$ 0	\$ 0
100666	STEP-PROJECT MGT OFFICE													\$ 0	\$ 0
100667	STEP-DESIGN AUTHORITY													\$ 0	\$ 0
100709	MERCURY ITG TOOL													\$ 744	\$ (302)
100710	ENVIRONMENTAL REPORTING													\$ 6,037	\$ 2,473
100722	ON DEMAND SOFTWARE													\$ 50,884	\$ 4,403
100736	CP-CAPEX REGULATED CO'S ONLY													\$ 2,827	\$ (1,061)
100757	VOICE RECOGNITION (OLD 100122)													\$ -	\$ -
100768	STEP-CSC REPORTING													\$ -	\$ -
100866	TENNESSEE 2006 RATE CASE													\$ -	\$ -
100897	PERFORMANCE REVIEW INFRAOPS													\$ -	\$ -
100908	SECURITY REPLACEMENT PROGRAM													\$ -	\$ -
50073227	INS (1) HYDRANT, WHITEHALL RD													\$ -	\$ -
50089961	PAINTING NORTH END TANK													\$ -	\$ -
50112360	TIME & LABOR PROGRAMMING													\$ -	\$ -
50115530	TN SECURITY OVERALL													\$ -	\$ -
888888	TN SECURITY OVERHEAD													\$ -	\$ -
999999	GENERAL OVERHEAD													\$ -	\$ -
TOTAL		\$ 15,324	\$ 4,878	\$ (2)	\$ 5,212	\$ 5,195	\$ 5,087	\$ 6,977	\$ 4,788	\$ 6,095	\$ 2,974	\$ 3,515	\$ 5,461	\$ 65,506	\$ 929
		\$ 4,184	\$ 2,320	\$ 2,545	\$ 3,787	\$ 4,926	\$ 7,039	\$ 3,414	\$ 3,155	\$ 5,338	\$ 2,669	\$ 1,338	\$ 2,669	\$ 41,309	\$ 2,124
		\$ (3,760)	\$ 76,081	\$ (16,830)	\$ 150,578	\$ 65,381	\$ 52,751	\$ 103,515	\$ 38,507	\$ 98,726	\$ 100,525	\$ 65,737	\$ 33,931	\$ 705,143	\$ 36,759

Capitalized Svc Co Transactions Billed to TN for 2005 through

Formula or Work Order	Description	2006 Feb	2006 Mar	2006 Apr	2006 May	2006 Jun	2006 Jul	2006 Aug	2006 Sep	2006 Oct	2006 Nov	2006 Dec	2006 Total	2007 Jan	Grand Total
100010	CP-CAPEX	\$ 370	\$ 229	\$ 184	\$ 184	\$ 303	\$ 293	\$ 264	\$ (8)	\$ (22)	\$ 108	\$ 147	\$ 2,713	\$ 149	\$ 22,252
100058	SE-CAPEX	\$ 5,182	\$ 5,577	\$ 1,397	\$ 1,432	\$ 5,770	\$ 3,777	\$ 3,158	\$ 4,381	\$ 4,518	\$ 6,121	\$ 4,248	\$ 44,031	\$ 5,495	\$ 105,647
100059	SE-CAPEX-NO OH	\$ 50	\$ 11	\$ 30	\$ 279	\$ 67	\$ 378	\$ 220	\$ 86	\$ 13	\$ 106	\$ 460	\$ 2,107	\$ 130	\$ 4,550
100103	TN 2004 RATE CASE AU0185														\$ 7,520
100110	CAP PROG MGT/ASSET PLAN AU0221	\$ 1,341	\$ 1,436	\$ 1,544	\$ 2,002	\$ 1,430	\$ 878	\$ 1,356	\$ 1,684	\$ 1,340	\$ 1,289	\$ 1,117	\$ 17,719	\$ 1,014	\$ 36,090
100111	SUPPLY CHAIN CAPEX-ALL REG'S														\$ 6,265
100122	VOICE RECOGNITION AU0360	\$ (0)	\$ 0	\$ 0	\$ (0)	\$ 1							\$ 0	\$ 0	\$ (346)
100139	STEP-MANAGEMENT AU0440	\$ 1,253	\$ 643	\$ 16	\$ 266	\$ (142)							\$ (1,039)		\$ 67,978
100144	STEP-EAM2 T&D MAXIMO AU0506														\$ 716
100145	STEP-EAM1 PLANT MAXIMO AU0507														\$ 6,923
100146	STEP-GIS AU0508	\$ 338	\$ 643	\$ 9	\$ 146	\$ (36)							\$ 1,222		\$ 14,236
100147	STEP TAX/FA MGMT AU0509	\$ 40	\$ -										\$ 40		\$ 56,533
100148	STEP-FICO AU0510	\$ (15,481)	\$ 658	\$ 34	\$ 545	\$ (292)							\$ 7,870		\$ 27,827
100149	STEP-HRIS AU0511	\$ (13,887)	\$ 432	\$ 19	\$ 287	\$ (154)							\$ (1,678)		\$ 23,914
100150	STEP MATERIAL MGMT AU0512	\$ (10,597)	\$ 363	\$ 19	\$ 316	\$ (169)							\$ 1,936		\$ -
100151	STEP-INVENTORY BAR CODE AU0513														\$ (678)
100152	STEP-REG/CCS AU0514	\$ 17	\$ 321	\$ 3	\$ 27	\$ (2)							\$ 366	\$ 0	\$ 14,993
100153	STEP-WO DIAGNOSTIC AU0515	\$ 981	\$ 1,614	\$ (441)	\$ 251	\$ (84)							\$ 1,170		\$ 84,312
100154	STEP-BUS INFORMATION AU0516	\$ 469	\$ 1,589	\$ 29									\$ (68)		\$ 49,379
100155	STEP-PORTAL AU0517	\$ 3,890	\$ 3,434	\$ 12	\$ 193	\$ (103)							\$ (6,289)		\$ 25,789
100156	STEP-BUS INTELLEGEANCE AU0518	\$ 395	\$ 1,590	\$ 9									\$ 67		\$ 14,639
100157	STEP-EAI AU0519	\$ 41	\$ 36	\$ 3	\$ 55	\$ (29)							\$ 735		\$ 27
100158	STEP-DOCUMENT MGMT AU0520														\$ (1,507)
100159	STEP-SERVICE FIRST AU0521	\$ 235	\$ (816)	\$ (813)	\$ 7	\$ 70							\$ 68		\$ 44,851
100160	STEP-MDSI PHASE 3 AU0522	\$ 33	\$ 25	\$ 3	\$ 42	\$ (22)									\$ (5,347)
100161	STEP-SCADA DATA WHSE AU0523	\$ 757			\$ 361	\$ 821	\$ 90	\$ 90	\$ 2,150	\$ 2,388	\$ 1,942	\$ 1,793	\$ 10,480		\$ 12,964
100563	CO 26 (TN) Direct Charge CAPEX	\$ 15	\$ 12	\$ 29	\$ 80	\$ 55	\$ 23	\$ 21	\$ 50				\$ 290		\$ 643
100590	FAIL ONLY ORIEN PIPE ASM STUDY	\$ 41	\$ 50	\$ 58	\$ 71	\$ 55	\$ 88	\$ 37	\$ 63	\$ 48	\$ 56	\$ 37	\$ 648	\$ 7	\$ 1,038
100591	AUTO METER READING MGT STUDY	\$ 245	\$ 292	\$ 319	\$ 396	\$ 272	\$ 179	\$ 183	\$ 328	\$ 250	\$ 225	\$ 210	\$ 3,226	\$ 190	\$ 6,603
100595	SUPPLY CHAIN SE-CAPEX ALL REG														\$ 0
100666	STEP-PROJECT MGT OFFICE	\$ (1)	\$ 0	\$ 0	\$ (3)	\$ 0							\$ 0		\$ 2
100667	STEP-DESIGN AUTHORITY														\$ (0)
100709	MERCURY ITG TOOL														\$ 744
100710	ENVIRONMENTAL REPORTING														\$ 56
100722	ON DEMAND SOFTWARE														\$ 49,404
100736	CP-CAPEX REGULATED CO'S ONLY	\$ 2,210	\$ 4,046	\$ 3,066	\$ 3,713	\$ 3,936	\$ 2,562	\$ 2,926	\$ 4,084	\$ 3,511	\$ 2,678	\$ 3,915	\$ 39,119	\$ 4,248	\$ 62,404
100757	VOICE RECOGNITION (OLD 100122)	\$ 122	\$ 969	\$ (903)	\$ 132	\$ 6,797							\$ 11,520		\$ 5,396
100768	STEP-CSC REPORTING	\$ 1,690	\$ 602	\$ 274		\$ 1,065							\$ 2,569		\$ 6,345
100866	TENNESSEE 2006 RATE CASE					\$ 774	\$ 450	\$ 1,050	\$ 1,375	\$ 864	\$ 72	\$ 1,277	\$ 5,862	\$ 483	\$ 661
100897	PERFORMANCE REVIEW INFRAOPS														\$ 180
100908	SECURITY REPLACEMENT PROGRAM														\$ 25
50073227	INS (1) HYDRANT, WHITEHALL RD					\$ 25									\$ 9,814
50089981	PAINTING NORTH END TANK														\$ 241
50112360	TIME & LABOR PROGRAMMING														\$ 49,936
50115530	TN SECURITY OVERALL														\$ 5,321
888888	LABOR BENEFIT OVERHEAD	\$ 7,274	\$ 4,312	\$ 2,453	\$ 6,158	\$ 876	\$ 3,927	\$ 3,660	\$ 5,637	\$ 4,465	\$ 4,456	\$ 5,789	\$ 49,936	\$ 5,321	\$ 120,763
999999	GENERAL OVERHEAD	\$ 4,266	\$ 2,499	\$ 1,474	\$ 6,717	\$ 1,701	\$ 4,502	\$ 3,074	\$ 5,671	\$ 4,462	\$ 3,499	\$ 5,876	\$ 45,863	\$ 2,898	\$ 90,070
TOTAL		\$ (6,710)	\$ 30,569	\$ 8,827	\$ 23,326	\$ 22,983	\$ 17,148	\$ 16,039	\$ 27,656	\$ 22,931	\$ 23,942	\$ 28,192	\$ 248,661	\$ 20,870	\$ 975,674

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1

SUPPLEMENTAL RESPONSE

Responsible Witness: **John Watson**

Question:

20. Provide all ***Documents*** reflecting, recording, referring to, reporting, or relating to the increase in the average cost of connecting a new customer since 2003, including, without limitation, a detailed itemization of each element of the costs for each year 2003 through 2006 of adding a new customer.

Response:

TAWC objects to this question on the grounds that it is overly burdensome and the information is not available in the requested format. Notwithstanding the objection TAWC provides the following response. Please see the response to TRA-1-question 24. In addition, the Company will make available at its office in Chattanooga the files supporting each project from which the requested information can be derived. The Company would request that the City notify TAWC at least two days prior to their visit so that the Company can arrange to have the appropriate personnel available to pull the files and respond to questions. The increased cost has been driven by increased transportation costs related to petroleum costs and increased cost of material, such as, copper.

Supplemental Response:

Attached are two files that provide data related to the drivers of the increased cost to install customer services. As indicated in the response increases from 2003 to 2006 on a percentage basis are as follows: (i) copper costs per foot has increased 216%, (ii) Contractor prices have increased 79% (related to strict

compaction requirements by the City of Chattanooga, (iii) Brass materials have increased from 23% to 79% depending on the type of material, (iv) Steel meter boxes have increased 30%, (v) steel meter box lid have increased 105%. In addition, there have been significant increases in the City of Chattanooga Street Opening Permits. The street opening permit is now \$1.00 per foot with a minimum of \$255 regardless of feet of pipe. A sidewalk cut permit is now \$50, and a driveway or curb cut permit is now \$100.

Tennessee American Water Company
Typical Component Costs of Residential New Service Installation

Item	Unit	2002	2003	2004	2005	2006	2007	Comments
3/4" Type L Copper Tubing Part # 4210H0H	Per Foot	\$ 0.8099 to \$0.883	\$0.7804 to \$1.0049 14.15%	\$1.1236 to \$1.3691 36.24%	\$1.15 to \$1.3996 23.67%	\$1.31 to \$3.3725 142.70%	2.0162	
3/4" Corporation Stop Brass, Flare Part #0202H0H	Each	\$ 8.8623	\$6.7911 to \$7.1902 4.78%	7.2198	\$6.95 to \$7.37 2.08%	\$7.59 to \$8.11 10.04%	8.5825	216.77%
5/8" x 3/4" Metersetter, Brass Part #1660G0H	Each	\$20.96 to \$22.9142	\$29.2187 to \$34.7283 51.56%	\$24.3818 to \$26.8020 -8.30%	\$24.3430 to \$30.2300 17.17%	\$30.59 to \$34.73 14.89%	35.4573	23.14%
5/8" x 3/4" Schlumberger Std Reg Water Meter	Each						2.09%	77.41%
14" x 14" Steel Meter Box Part #1971414	Each		\$31.1733 to \$33.7127	\$31.1028 to \$36.3683 7.88%	\$34.0975 to \$39.3219 8.10%	\$36.50 to \$38.00 7.05%	40.7322	30.21%
3/4" x 1" x 1" Brass Tee, CC	Each					\$	10.8790	
Contractor New Service-Open Cut	Per Service	\$	375.00 \$	375.00 \$	400.00 \$	450.00 \$	475.00	24.72%
Contractor New Service-Boring	Per Service	\$	425.00 \$	425.00 \$	450.00 \$	475.00 \$	525.00	5.56%
Service lateral in New Devel. (Long)	each	\$	225.00 \$	225.00 \$	320.00 \$	375.00 \$	450.00	10.53%
Service Lateral in New Devel (Short)	each	\$	225.00 \$	225.00 \$	160.00 \$	180.00 \$	165.00	20.00%
Meter Settings 1" & Less	each	\$	30.00 \$	30.00 \$	25.00 \$	30.00 \$	35.00	17.19%
Granular Backfill, in place	Per Ton	\$	14.00 \$	14.00 \$	14.00 \$	15.00 \$	16.75	2.78%
Granular Backfill, f.o.b. Quarry (Vulcan Materials)	Per Ton				0.00%	7.14%	11.67%	-13.61%
	Per Ton					8.00		20.00%
Company Labor	Per Hour	\$	20.01 \$	20.51 \$	21.02 \$	21.65 \$	22.30	18.81%
Heavy Equipment Operator	Per Hour	\$	19.62 \$	20.35 \$	20.86 \$	21.49 \$	22.13	
Truck Driver/Utility Worker	Per Hour	\$	19.46 \$	20.08 \$	20.58 \$	21.20 \$	21.84	
Utility Worker	Per Hour	\$	19.21 \$	20.08 \$	20.58 \$	21.20 \$	21.84	
% increase			2.0%	2.5%	2.5%	3.0%	3.0%	13.00%
Asphalt	Per Ton					\$		
Projected Increase Jan 1, 2007	Per Ton					\$		Petroleum product increases
Projected Increase Jan 1, 2007	Per Ton					\$		Petroleum product increases
May 8, 2006 Increase eff. May 15, 2006	Per Ton					\$		Petroleum product increases
May 8, 2006 Increase eff. May 15, 2006	Per Ton					\$		Petroleum product increases
March 13, 2006 notice of increase eff. April 1	Per Ton					\$		Petroleum product increases
March 13, 2006 notice of increase eff. April 1	Per Ton					\$		Petroleum product increases
January 25, 2006 notice of increase eff. March 1	Per Ton					\$		Petroleum product increases
January 25, 2006 notice of increase eff. March 1	Per Ton					\$		Petroleum product increases
January 25, 2006 notice of increase eff. March 1	Per Ton					\$		Petroleum product increases

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1
Supplemental Response

Responsible Witness: Michael Miller

Question:

33. ***Explain*** the annual dividends per share of common stock paid by **TAWC** for fiscal year after January 1, 1996.

Response:

TAWC objects to this question on the grounds that the requested information is overly burdensome and in part not relevant to this proceeding. Notwithstanding this objection, TAWC provides the following response. TAWC's historical dividend policy is pay 75% of net income in dividends to its shareholder and that policy is not expected to change. The calculated dividend per share of common stock paid for 2003-2005 are provided below. The 2006 audited financial statements for TAWC are not complete at this time.

Source: TAWC Annual Reports, (000) omitted from Dividends

	Dividends	Common Shares	Dividend per Share
2003	\$1,854	13,754,234	\$0.1348
2004	\$2,445	13,754,234	\$0.1778
2005	\$2,420	13,754,234	\$0.1759

Supplemental Response:

TAWC's dividend policy is described above. See the attachment which contains the AWWC dividend policy regarding the regulated subsidiaries. The dividend policy of each AWWC regulated subsidiary, including TAWC, is uniform. All AWWC regulated subsidiaries pay dividends at 75% of net income. Dividends are paid one quarter in arrears of the quarter in which the net income is

generated. The fiscal year for dividend calculations is October through September and that fiscal year provides the net income basis on which dividends are paid as shown on the YTD calendar year financial statements.

Table of Contents For 1.0 Dividends

Table of Contents.....	1
1.1 Subsidiary Dividends.....	3

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Version #: Final

Effective Date:
3/1/2006

Approved By:
Ellen Wolf, CFO

Page 1 of 5

1 – Dividends		
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Definitions: As used in the policy,

“American Water Works CFO” means the SVP & CFO of the Company and

“Authorization and Limitation of Corporate Authority” means the further delegation by the CEO of American Water of activities approved by the American Water Works Board.

“Business Unit Finance” means the finance departments of the North East, South East, Central, West and AWE business units.

“Company” means American Water Works Company, Inc.

“Corporate Treasurer” means the VP & Treasurer of the Company.

“Legal Entity Board” and “Board” mean the Board of Directors providing governance of the legal entity.

“Non-utility Subsidiary” means a non-regulated subsidiary of the Company.

“SSC” means the Shared Service Center of the Company.

“Utility Subsidiary” means a regulated subsidiary of the Company.

“Affiliate” means any company (including each Subsidiary) that controls, is controlled, or is under common control with the Company and

“Subsidiary” means any company of which more than 50% of the voting power is held directly or indirectly by the Company.

“Minority Shareholders” means any individual or non-Affiliate entity whom is a shareholder of an Affiliate.

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Version #: Final

Effective Date: 3/1/2006	Approved By: Ellen Wolf, CFO	Page 2 of 5
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Subject: 1 – Dividends	Subsidiary Dividends	
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1.1 Subsidiary Dividends

Purpose: American Water Works Company, Inc. is a holding company whose principal asset is the common stock of its subsidiaries. The Company's dividend policy for its subsidiaries is structured to provide the holding company with cash necessary to meet its obligations to its subsidiaries and to its shareholders.

A balance between an appropriate capital structure for each subsidiary and maximizing dividend payouts to shareholders must be maintained. The following policy is intended to ensure that equity is strictly managed while ensuring that shareholders receive appropriate dividend payments.

Responsibility: Business Unit Finance Departments

Timing: Quarterly

Procedures: 1.1.1 General

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Version #: Final

Effective Date: 3/1/2006	Approved By: Ellen Wolf, CFO	Page 3 of 5
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Subject: - Dividends	Subsidiary Dividends	
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1.1 Subsidiary Dividends

Confidential

Version #: Final

Effective Date: 3/1/2006	Approved By: Ellen Wolf, CFO	Page 4 of 5
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Subject: – Dividends	Subsidiary Dividends	
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1.1 Subsidiary Dividends

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Version #: Final

Effective Date: 3/1/2006	Approved By: Ellen Wolf, CFO	Page 5 of 5
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TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1

SUPPLEMENTAL RESPONSE

Responsible Witness: Michael Miller

Question:

37. Reference Michael Miller Q. 16-17. Produce any documents that justify the retirement of approximately \$19 million in debt at 4.75% interest with debt at 6.15%.

Response:

The Company has filed a petition in case number 06-00305 requesting authorization to issue LT Debt through 2007. The documents supporting that case are available on the TRA website.

Attached to this response are the notes between TAWC and AWCC, and AWCC and RWE. I would draw your attention to the call provisions of both notes which are identified by the highlighted sections of the notes. To paraphrase the language of the notes dealing with the call, the note between AWCC and RWE indicates that the call of the note is mandatory if there is a change in shareholder structure of the Borrower (AWCC), and the note between TAWC and AWCC indicates the repayment of principle by TAWC shall be made in accordance with the terms which the Lender (AWCC) shall repay its Lender (RWE).

Supplemental Response:

TAWC is prepared at the appropriate time in the processing of this case to commit as follows: RWE will make TAWC whole on the impact of the call of the TAWC \$19.0 million, 4.75% Long-term note issued to AWCC with a full maturity date of March, 2014 to the extent that the interest rate on the replacement note

for that \$19.0 equivalent exceeds the 4.75% interest rate. TAWC will make the Commission aware of this commitment by RWE and produce schedules showing the impact on the requested revenue requirement in this case, or amend the petition in this case if that is appropriate. Mr. Miller's testimony indicates an estimate of 6.15% on the replacement note for the \$19.0 million call the Company expects savings from the 6.15% estimate, as well as, further savings related to the make whole commitment above. The Company would expect to provide this commitment well before the settlement conference and hearings scheduled for this case.

TENNESSEE AMERICAN WATER COMPANY
Docket No. 06-00290
City of Chattanooga Discovery Request No. 1

SUPPLEMENTAL RESPONSE

Responsible Witness: Michael Miller

Question:

38. Reference Michael Miller Q 27. What is the basis for the inflation rate of 5% for management fees?

Response:

Please see the response to CAD -1-question 20.

Supplemental Response:

The Service Company costs are primarily labor charges and associated benefit costs for employees who charge time to TAWC. As described on the exhibits to CAD Data Request 1-Part II-question 20. The Company built its management fee attrition year request using the historical test-year number as the base. That number was then adjusted by 5% to reflect the increase to move the number forward one year (June 2007) and another prorated 5% (eight-twelve's) to move the number to be reflective of the attrition year ending February 2008. The 5% inflation factor was determined by assessing the projected salary increases and benefit cost increases forecasted for the period, as well as, changes in the service levels expected by TAWC in the attrition year. At the time of filing the case, TAWC did not have the final management fee budget detail for 2007. Subsequent to filing the case the final 2007 budget management fee schedules were not available. TAWC provided those on pages 2 and 3 of the attachments to CAD Data Request-Part II-questions 20 which reflect the 2007 management fee budgets for the Corporate and Regional offices respectively. The total

budget of charges to TAWC from both offices total \$4,150,090 as shown on page 1 of 1 of the attachments to CAD Data Request 1-Part II-question 20, or \$85,669 more than the Company included in its Petition for attrition year management fees.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**PETITION OF TENNESSEE AMERICAN)
WATER COMPANY TO CHANGE AND)
INCREASE CERTAIN RATES AND)
CHARGES SO AS TO PERMIT IT TO)
EARN A FAIR AND ADEQUATE)
RATE OF RETURN ON ITS PROPERTY)
USED AND USEFUL IN FURNISHING)
WATER SERVICE TO ITS CUSTOMERS)**

DOCKET NO. 06-00290

AFFIDAVIT

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA

I, MICHAEL MILLER, Treasurer/Comptroller for Tennessee American Water Company, do hereby certify that the foregoing responses to the Supplemental Data Requests from the City of Chattanooga were prepared by me or under my supervision and are true and accurate to the best of my knowledge and information.

DATED this 14 day of February, 2007.

Michael A. Miller
(signature)

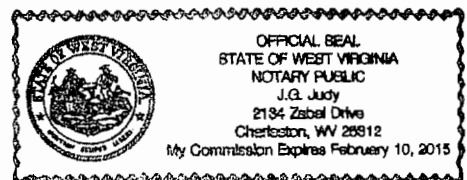
Michael A. Miller
(printed name)

Sworn to and subscribed before me this 14th day of February, 2007.

J.G. Judy
NOTARY PUBLIC

My Commission Expires:

February 10, 2015



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of *Tennessee American Water Company's Supplemental Responses to City of Chattanooga's First Discovery Requests* has been served via the method(s) indicated, on this the 14th day of February, 2007, upon the following:

☐ Hand-Delivery	Michael A. McMahan
☐ U.S. Mail	Special Counsel
☐ Facsimile	City of Chattanooga (Hamilton County)
☒ Overnight	Office of the City Attorney
☒ Email	Suite 400
	801 Broad Street
	Chattanooga, TN 37402
☐ Hand-Delivery	Frederick L. Hitchcock, Esq.
☐ U.S. Mail	Shareholder
☐ Facsimile	Chambliss, Bahner & Stophel, P.C.
☒ Overnight	1000 Tallan Building
☒ Email	Two Union Square
	Chattanooga, TN 37402
☒ Hand-Delivery	Vance Broemel, Esq.
☐ U.S. Mail	Stephen Butler, Esq.
☐ Facsimile	Consumer Advocate and Protection Division
☐ Overnight	Office of Attorney General
☒ Email	2nd Floor
	425 5th Avenue North
	Nashville, TN 37243-0491
☒ Hand-Delivery	Henry M. Walker, Esq.
☐ U.S. Mail	Boult, Cummings, Conners & Berry, PLC
☐ Facsimile	Suite 700
☐ Overnight	1600 Division Street
☒ Email	P.O. Box 340025
	Nashville, TN 37203
☐ Hand-Delivery	David C. Higney, Esq.
☐ U.S. Mail	Grant, Konvalinka & Harrison, P.C.
☐ Facsimile	633 Chestnut Street, 9 th Floor
☒ Overnight	Chattanooga, TN 37450
☒ Email	

