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March 19, 2007

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VIA EMAIL AND USPS

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

Re: Docket No. 06-00290

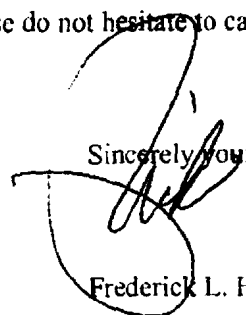
Dear Chairman Kyle:

I have enclosed the original and six (6) copies of the City of Chattanooga's Objections to Discovery Requests of Petitioner Tennessee American Water Company. A copy has also been sent via email to everyone listed on the Certificate of Service.

If there are any questions, please do not hesitate to call me.

With best regards, I am

Sincerely yours,



Frederick L. Hitchcock

FLH/sjw
Enclosures

cc: The Honorable Sara Kyle, Chairman
Mr. J. Richard Collier
Mr. Jerry Kettles
Mr. R. Dale Grimes
Mr. J. Davidson French
Mr. Robert E. Cooper, Jr.
Mr. Vance L. Broemel
Mr. Stephen R. Butler
Mr. David C. Higney
Mr. Henry W. Walker
Mr. Michael A. McMahan
Mr. Harold L. North

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

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

**CITY OF CHATTANOOGA'S OBJECTIONS TO PETITIONER TENNESSEE
AMERICAN WATER COMPANY'S DISCOVERY REQUESTS**

Intervenor. The City of Chattanooga ("Chattanooga"), by and through counsel, hereby makes the following objections to the discovery requests of Petitioner Tennessee American Water Company ("TAWC") upon the City of Chattanooga.

GENERAL OBJECTIONS

- (1) Chattanooga objects to all requests that seek information protected by the attorney- client privilege, the work product doctrine, and/or any other applicable privilege or restriction on disclosure.
- (2) Chattanooga objects to the definitions and instructions accompanying requests to the extent definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by the Tennessee Rules of Civil Procedure or the rules, regulations, and orders of the Tennessee Regulatory Authority.
- (3) Chattanooga objects to the definitions of the words "document" or "documents" or "documentation" that accompany the requests, because such definitions are overbroad and unduly burdensome.

(4) The objections set forth herein are based upon limited information now available to it because of the inability to consult with responsible officials prior to the submission of these objections, and Chattanooga reserves the right at any time to revise, correct, add to or clarify the objections.

(5) Chattanooga is providing its objections herein without waiver of, or prejudice to, its right at any later time to raise objections to: (a) the competence, relevance, materiality, privilege, or admissibility of the response, or the subject matter thereof; and (b) the use of any response, or subject matter thereof, in any subsequent proceedings.

(6) Chattanooga objects to each request to the extent that it is unreasonably cumulative or duplicative, or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

(7) Chattanooga objects to each request to the extent it is premature such that it seeks information concerning matters about which discovery is ongoing and/or seeks information to be provided by expert witnesses.

(8) Chattanooga's specific objections to each request shall be in addition to the General Objections set forth in this section. These General Objections form a part of each discovery response, and they are set forth here to avoid the duplication and repetition of restating them for each discovery response. The absence of a reference to a General Objection in response to a particular request does not constitute a waiver of any General Objection with respect to that discovery request. All responses are made subject to and without waiver of Chattanooga's general and specific objections.

(9) Chattanooga objects to TAWC's discovery requests that seek information concerning rates, costs, or charges of municipal services or municipally-owned utilities owned

and/or operated by the City of Chattanooga or any of its boards or agencies, as such discovery seeks information that is totally irrelevant to these proceedings and cannot reasonably be expected to lead to the discovery of admissible evidence.

(10) Chattanooga objects to TAWC's discovery requests that seek information concerning tax rates or expenditures of the City of Chattanooga or any other local government, as such discovery seeks information that is totally irrelevant to these proceedings and cannot reasonably be expected to lead to the discovery of admissible evidence.

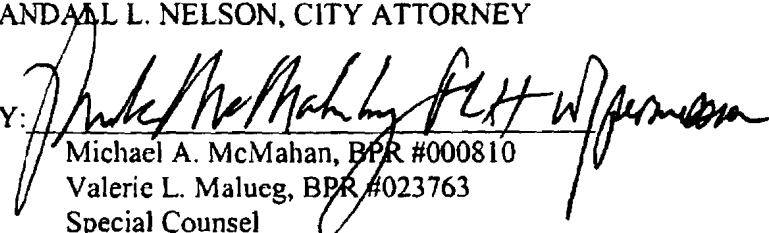
(11) Chattanooga objects to TAWC's discovery requests that seek information concerning fees charged or received by the City of Chattanooga or any of its boards or agencies, as such discovery seeks information that is totally irrelevant to these proceedings and cannot reasonably be expected to lead to the discovery of admissible evidence.

(12) Chattanooga hereby asserts each of the foregoing General Objections as to each of the discovery requests propounded by TAWC to Chattanooga and shall supplement them, as determined necessary, in its responses to the specific discovery requests.

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
RANDALL L. NELSON, CITY ATTORNEY

BY:


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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served a true and correct copy of the foregoing pleading by electronic mail and by depositing same in the United States mail, postage prepaid, and addressed to the following:

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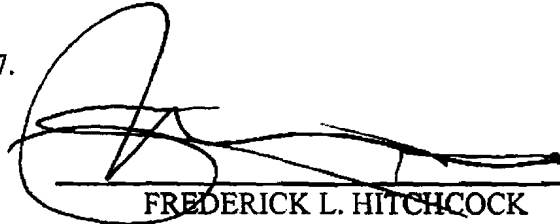
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This the 19th day of March, 2007.



FREDERICK L. HITCHCOCK