

1000 Tallan Building Two Union Square Chattanooga, TN 37402 Tel 423.756.3000 www.cbslawfirm.com

Frederick L. Hitchcock Tel 423.757.0222 Fax 423.508.1222 rhitchcock@cbslawfirm.com

March 30, 2007

## VIA EMAIL AND USPS

The Honorable J. Richard Collier General Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

filed electronically in docket office on 03/30/07

Re: <u>Docket No. 06-00290</u>

Dear Mr. Collier:

The City of Chattanooga ("Chattanooga") hereby notifies you of the status of its objections to the discovery requests served upon it by the Tennessee American Water Company ("TAWC").

Chattanooga believes that its responses to TAWC's request will be properly responsive, consistent with *Tennessee Rules of Civil Procedure* and the Authority's rules. Chattanooga will review TAWC's responses to Chattanooga's Second Discovery Requests to determine whether they are properly responsive and are consistent with such rules. Chattanooga reserves the right to supplement its pending Motions to Compel if necessary.

In the absence of specific agreements and to avoid any waiver of its objections, Chattanooga continues to assert all of the objections set forth in the City of Chattanooga's Objections to Petitioner Tennessee American Water Company's discovery requests, filed on March 19, 2007.

The Honorable J. Richard Collier Page Two March 30, 2007

With best regards, I am

Frederick L. Hitchcock

Sincerely yours,

## FLH/sjw

cc: The Honorable Sara Kyle, Chairman (via email and USPS)

Mr. Jerry Kettles (via email and USPS)

Mr. R. Dale Grimes (via email and USPS)

Mr. J. Davidson French (via email and USPS)

Mr. Robert E. Cooper, Jr. (via email and USPS)

Mr. Vance L. Broemel (via email and USPS)

Mr. Stephen R. Butler (via email and USPS)

Mr. David C. Higney (via email and USPS)

Mr. Henry W. Walker (via email and USPS)

Mr. Michael A. McMahan (via email and USPS)

Mr. Harold L. North (via hand delivery)