

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

TENNESSEE AMERICAN WATER COMPANY, :  
PETITION TO CHANGE AND INCREASE : DOCKET NO. 06-00290  
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 SERVICES TO ITS :  
CUSTOMERS. :

**CITY OF CHATTANOOGA'S SUPPLEMENTAL  
DISCOVERY RESPONSE TO TAWC**

City of Chattanooga ("City") supplements its response to the Tennessee American Water Company's ("TAWC") discovery requests as follows:

**DISCOVERY REQUEST NO. 23:**

Please provide the following information for the City of Chattanooga 311 Call Center for the years 2005 and 2006:

- a. A detailed break down of costs (i.e. labor, benefits, building costs or rent, utility expenses, telephone expense, information technology (IT costs), contractor services, office supplies, etc.)
- b. The average hourly rate for each service representative.
- c. The salaries of any management employees.
- d. How much of Mr. Keil's salary, benefits and expenses are allocated to the 311 Call Center?
- e. The total number of customer contacts received each year.
- f. The average cost per customer contact.

- g. Copies of all customer satisfaction surveys referenced in Mr. Keil's testimony for both years.
- h. Key performance indicators and results used to measure performance.
- i. Describe all services provided by 311 call centers.

**SUPPLEMENTAL RESPONSE NO. 23:**

See attached information and averages below:

- Customer Service Representative: \$26,835.46
- Senior Customer Service Representative: \$28,092.89
- Asst. Customer Service Coordinator: \$33,844.92
- Customer Service Coordinator: \$45,689.90

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE  
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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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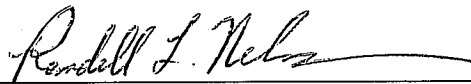
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This the 12<sup>th</sup> day of April, 2007.

  
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Date: 04/12/2007  
Time: 08:57

CITY OF CHATTANOOGA  
Employee Age, Sex and Salary

Pgm: HRPRI206\_ASOR  
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Dept: GENERAL GOVERNMENT  
Org: GG CITIZENS RELATIONS MANAGEM

Employee ID	Position Title	Sex	Ethnic Code	Age	Annual Salary	
0061958	CUSTOMER SERVICE REPRESENTATIV	F	B	51	\$24,444.99	THURMAN, NEVA H.
0062572	CUSTOMER SERVICE REPRESENTATIV	F	B	41	\$26,617.96	SHANNON, SONYA C.
0056110	CUSTOMER SERVICE REPRESENTATIV	F	B	43	\$26,617.96	DAVIS, PATRICIA D.
0062565	CUSTOMER SERVICE REPRESENTATIV	F	C	22	\$26,617.96	PIERCE, JODI R.
0060653	CUSTOMER SERVICE REPRESENTATIV	F	B	51	\$27,704.97	ROBERTS, PAMELA J.
0061964	CUSTOMER SERVICES REP SR	F	B	31	\$28,092.89	MCCLAIN, ROSHONDA N.
0061638	CUSTOMER SERVICE REPRESENTATIV	M	B	33	\$29,008.92	COTHERN, HENRY A.
0062020	ASSIST CUSTOMER SVS COORDINAT	M	C	49	\$33,844.92	STEVENS, PHILLIP G.
0062005	CUSTOMER SERVICE COORDINATOR	F	C	57	\$45,689.90	HENLEY, ELIZABETH S.

Employees in Organization: 9

\$268,640.47

Employees in Department: 9

\$268,640.47

Ethnic Codes

A - American Native, AB - Aboriginal, B - Black  
C - Caucasian, O - Oriental/Asian, S - Hispanic/Spanish