

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 FOURTH 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.

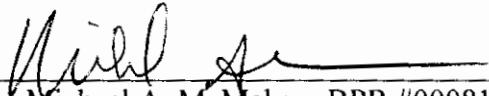
- g. Copies of all customer satisfaction surveys referenced in Mr. Keil's testimony for both years.
- h. Key performance indicators and results used to measure performance.
- i. Describe all services provided by 311 call centers.

FOURTH SUPPLEMENTAL RESPONSE TO REQUEST NO. 23:

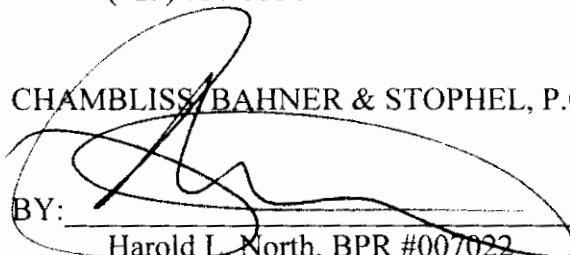
See Exhibit "A" reflecting the Employee Salary History and Age for the years 2003, 2004, 2005, 2006, and 2007.

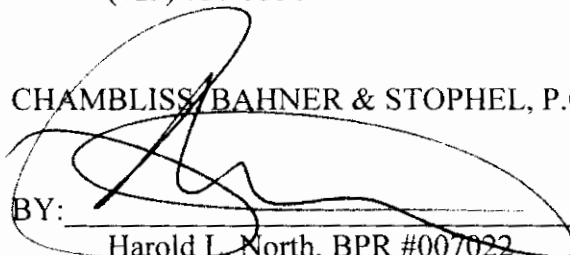
Respectfully submitted,

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

BY: 

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Valerie L. Malueg, BPR #023763
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BY: 

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Two Union Square
Chattanooga, TN 37402
(423) 756-3000

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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Tennessee Regulatory Authority
460 James Robertson Parkway
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Honorable Sara Kyle
Chairman
Tennessee Regulatory Authority
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Mr. Jerry Kettles
Chief of Economic Analysis & Policy Division
Tennessee Regulatory Authority
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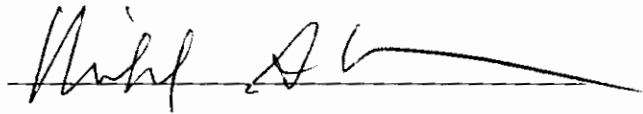
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1600 Division Street, Suite 700
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Nashville, TN 37203
hwalker@boultcummings.com

This the 16th day of April, 2007.

A handwritten signature in black ink, appearing to read "Henry M. Walker", is written over a horizontal line.

Dept: GENERAL GOVERNMENT
Org: GG CITIZENS RELATIONS MANAGEMEN

Employee ID	Employee Name	Position Code	Position Title	Sex	Ethnic Code	Age	Annual Salary
0062005	HENLEY, ELIZABETH S.	C02108	CUSTOMER SERVICE COORDINATOR	F	C	54	\$38,094.99
0037782	EBERSON, ANITA H.	C02107	CUSTOMER SERVICE REPRESENTATIVE	F	C	56	\$32,261.01
0062021	TISDALE, TERRY A.	C02107	CUSTOMER SERVICE REPRESENTATIVE	M	B	31	\$25,090.00
0062020	STEVENS, PHILLIP G.	C02107	CUSTOMER SERVICE REPRESENTATIVE	M	C	45	\$24,066.02
0061964	MCCLAIN, ROSHONDA N.	C02107	CUSTOMER SERVICE REPRESENTATIVE	F	B	27	\$23,042.03
0056110	DAVIS, PATRICIA D.	C02107	CUSTOMER SERVICE REPRESENTATIVE	F	B	40	\$23,042.03
Employees in Organization: 6							\$165,596.08

Employees in Department: 6 \$165,596.08



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

Date: 04/13/2007
Time: 15:03

CITY OF CHATTANOOGA
Employee Salary History and Age as of Jun. 30, 2004

Pgm: HRPRI277_EAPH
Page: 1

Dept: GENERAL GOVERNMENT
Org: GG CITIZENS RELATIONS MANAGEMEN

Employee ID	Employee Name	Position Code	Position Title	Sex	Ethnic Code	Age	Annual Salary
0062005	HENLEY, ELIZABETH S.	C02108	CUSTOMER SERVICE COORDINATOR	F	C	55	\$39,237.95
0037782	EBERSON, ANITA H.	C02107	CUSTOMER SERVICE REPRESENTATIVE	F	C	57	\$33,229.04
0061638	COTHEARN, HENRY A.	C02107	CUSTOMER SERVICE REPRESENTATIVE	M	B	31	\$25,842.96
0062020	STEVENS, PHILLIP G.	C02107	CUSTOMER SERVICE REPRESENTATIVE	M	C	46	\$24,787.98
0061964	MCCLAIN, ROSHONDA N.	C02107	CUSTOMER SERVICE REPRESENTATIVE	F	B	28	\$23,733.01
0061958	THURMAN, NEVA H.	C02107	CUSTOMER SERVICE REPRESENTATIVE	F	B	49	\$21,624.93
Employees in Organization: 6							\$168,455.87

Employees in Department: 6

\$168,455.87

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CITY OF CHATTANOOGA
Employee Salary History and Age as of Jun. 30, 2005

Pgm: HRPRI277 EAPH
Page: 1

Dept: GENERAL GOVERNMENT
Org: GG CITIZENS RELATIONS MANAGEMEN

Employee ID	Employee Name	Position Code	Position Title	Sex	Ethnic Code	Age	Annual Salary
0062005	HENLEY, ELIZABETH S.	C02108	CUSTOMER SERVICE COORDINATOR	F	C	56	\$42,519.98
0062020	STEVENS, PHILLIP G.	C02106	CUSTOMER SERVICES REP SR	M	C	47	\$28,390.96
0062494	PACK, GREG S.	C02107	CUSTOMER SERVICE REPRESENTATIV	M	C	36	\$26,897.94
0061638	COTHERN, HENRY A.	C02107	CUSTOMER SERVICE REPRESENTATIV	M	B	32	\$26,897.94
0060653	ROBERTS, PAMELA J.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	49	\$25,842.96
0062334	BUFFINGTON, CARMEN A.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	S	44	\$24,787.98
0061964	MCCLAIN, ROSHONDA N.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	29	\$24,787.98
0061958	THURMAN, NEVA H.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	50	\$22,679.07
-----							\$222,804.81

Employees in Organization: 8

Employees in Department: 8

\$222,804.81

Ethnic Codes
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Dept: GENERAL GOVERNMENT
Org: GG CITIZENS RELATIONS MANEGEME

Employee ID	Employee Name	Position Code	Position Title	Sex	Ethnic Code	Age	Annual Salary
0062005	HENLEY, ELIZABETH S.	C02108	CUSTOMER SERVICE COORDINATOR	F	C	57	\$44,358.91
0062020	STEVENS, PHILLIP G.	C02109	ASSIST CUSTOMER SVS COORDINAT	M	C	48	\$32,859.01
0061638	COTHERN, HENRY A.	C02107	CUSTOMER SERVICE REPRESENTATIV	M	B	33	\$28,164.03
0061964	MCCLAIN, ROSHONDA N.	C02106	CUSTOMER SERVICES REP SR	F	B	30	\$27,275.04
0060653	ROBERTS, PAMELA J.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	50	\$26,897.94
0056110	DAVIS, PATRICIA D.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	43	\$25,842.96
0062572	SHANNON, SONYA C.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	40	\$25,842.96
0062565	PIERCE, JODI R.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	C	22	\$25,842.96
0061958	THURMAN, NEVA H.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	51	\$23,733.01
Employees in Organization: 9							\$260,816.82

Employees in Department: 9

\$260,816.82

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CITY OF CHATTANOOGA
Employee Salary History and Age as of Apr. 13, 2007

Time: 15:03

Dept: GENERAL GOVERNMENT
Org: GG CITIZENS RELATIONS MANAGEMEME

Employee ID	Employee Name	Position Code	Position Title	Sex	Ethnic Code	Age	Annual Salary
0062005	HENLEY, ELIZABETH S.	C02108	CUSTOMER SERVICE COORDINATOR	F	C	57	\$45,689.90
0062020	STEVENS, PHILLIP G.	C02109	ASSIST CUSTOMER SVS COORDINAT	M	C	49	\$33,844.93
0061638	COTHERN, HENRY A.	C02107	CUSTOMER SERVICE REPRESENTATIV	M	B	33	\$29,008.93
0061964	MCCLAIN, ROSHONDA N.	C02106	CUSTOMER SERVICES REP SR	F	B	31	\$28,092.90
0060653	ROBERTS, PAMELA J.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	51	\$27,704.98
0056110	DAVIS, PATRICIA D.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	43	\$26,617.97
0062572	SHANNON, SONYA C.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	41	\$26,617.97
0062565	PIERCE, JODI R.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	C	22	\$26,617.97
0061958	THURMAN, NEVA H.	C02107	CUSTOMER SERVICE REPRESENTATIV	F	B	51	\$24,444.99
Employees in Organization: 9							\$268,640.54

Employees in Department: 9

\$268,640.54

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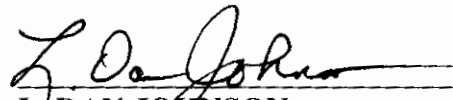
AFFIDAVIT OF L. DAN JOHNSON

STATE OF TENNESSEE

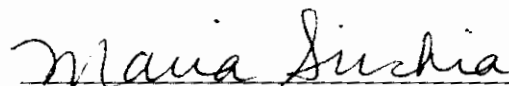
COUNTY OF HAMILTON

I, L. DAN JOHNSON, Chief of Staff for Mayor Ron Littlefield, City of Chattanooga, Tennessee, do hereby certify that the Fourth Supplemental Response of the City of Chattanooga to the Discovery Requests of the TAWC were prepared under my general supervision and are true and accurate to the best of my knowledge and information.

DATED this 16th day of April, 2007.


L. DAN JOHNSON

Sworn to and subscribed before me this 16th day of April, 2007.


NOTARY PUBLIC

My Commission Expires:

2/6/2010

