

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF TENNESSEE)	
AMERICAN WATER COMPANY TO)	
CHANGE AND INCREASE CERTAIN)	
RATES AND CHARGES SO AS TO)	DOCKET NO. 08-00039
PERMIT IT TO EARN A FAIR AND)	
ADEQUATE RATE OF RETURN ON)	
ITS PROPERTY USED AND USEFUL IN)	
FURNISHING WATER SERVICE TO)	
ITS CUSTOMERS)	

**CONSUMER ADVOCATE AND PROTECTION DIVISION'S MOTION TO SUBMIT A
LIMITED REPLY TO TENNESSEE AMERICAN WATER COMPANY'S RESPONSE
IN OPPOSITION TO THE CONSUMER ADVOCATE'S MOTION TO ASK
ADDITIONAL DISCOVERY REQUESTS**

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to TRA Rule 1220-1-2-.06(3), hereby requests leave to submit a limited reply to the response of Tennessee American Water Company ("TAWC" or "Company") to the Consumer Advocate's motion requesting permission to ask additional discovery questions in excess of the eighty questions authorized by the Hearing Officer in his Order Granting Petitions to Intervene and Establishing a Procedural Schedule entered on May 1, 2008.

For cause, petitioner would show as follows:

1. TAWC's response contains erroneous information and incorrect assertions of fact.
2. According to the procedural schedule, TAWC's responses to the Consumer Advocate's discovery questions are due relatively soon -- next week on May 28, 2008.

3. If the Hearing Officer is inclined to rule on the Consumer Advocate's motion for additional questions prior to May 28, 2008, such a ruling would have to be made within the next few days.

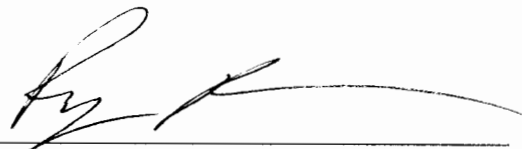
4. The Consumer Advocate believes it is necessary to clarify the facts and the record before the Hearing Officer rules on the Consumer Advocate's motion to ask additional discovery questions. Otherwise, the Hearing Officer's ruling could be based on incorrect information.

5. The limited reply the Consumer Advocate desires to file in this docket accomplishes such clarification.

6. The limited reply is submitted contemporaneously with this motion.

WHEREFORE, the Consumer Advocate requests leave of the Hearing Officer to file its limited reply.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read 'Ryan L. McGehee', is written over a horizontal line.

RYAN L. McGEHEE
Assistant Attorney General
Office of the Attorney General and Reporter
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202-0207

Dated: May 21, 2008

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing is being served via U.S. Mail and/or electronic mail upon:

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This the 26 day of May, 2008.



RYAN L. McGEHEE
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