

LAW OFFICES
GKH
GRANT KONVALINKA & HARRISON, P.C.

Ninth Floor, Republic Centre
633 Chestnut Street
Chattanooga, Tennessee 37450-0900

Telephone 423/756-8400
Facsimile 423/756-6518
www.gkhpc.com

June 13, 2008

Chairman Eddie Roberson
c/o Sharla Dillon
Tennessee Regulatory Authority
460 Robertson Parkway
Nashville, TN 37243-0505

**VIA E-MAIL &
FIRST CLASS MAIL**

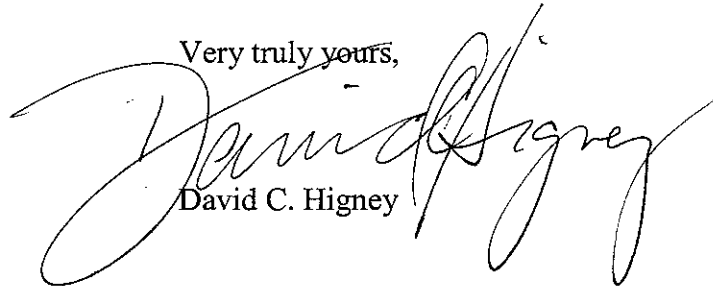
Re: **TRA Docket No. 08-0039**

Dear Chairman Roberson:

Enclosed please find an original and four (4) copies of Chattanooga Manufacturers Association's Supplemental Responses to Tennessee American Water Company's First Set of Discovery Requests after the Parties Meet and Confer. Please return a file-stamped copy to us in the enclosed, self-addressed stamped envelope.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



David C. Higney

DCH/dmm

Enclosure

cc: Hon. Ron Jones (w/o enclosure)
Hon. Sara Kyle (w/o enclosure)
Hon. Tre Hargett (w/o enclosure)
Mr. J. Richard Collier (w/o enclosure)
Mr. Henry M. Walker (w/enclosure)
Mr. Michael A. McMahan (w/enclosure)
Mr. Harold L. North, Jr. (w/enclosure)
Mr. Frederick. L. Hitchcock (w/enclosure)
Mr. Dale Grimes/Mr. Ross I. Booher (w/enclosure)
Mr. Robert E. Cooper, Jr./Mr. Timothy C. Phillips/Mr. Ryan L. McGehee (w/enclosure)

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

IN RE:

*PETITION OF TENNESSEE-
AMERICAN WATER COMPANY TO
CHANGE AND INCREASE CERTAIN
RATES AND CHARGES...*

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) Docket No. 08-00039
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**CHATTANOOGA MANUFACTURERS ASSOCIATION'S SUPPLEMENTAL
RESPONSES TO TENNESSEE AMERICAN WATER COMPANY'S
FIRST SET OF DISCOVERY REQUESTS AFTER THE PARTIES MEET & CONFER**

The Chattanooga Manufacturers Association ("CMA"), by and through its attorneys, subsequent to the "Meet & Confer" process agreed upon by the parties and as described in the Hearing Officer's Order dated June ___, 2008, submits the following supplemental responses and objections to the Tennessee American Water Company's (the "Company" or "TAWC") Discovery Requests propounded upon CMA. CMA reincorporates by reference herein all of its prior objections and responses (generally and specifically applicable) to the Company's requests and, subject to and without waiving the above and pursuant to the "Meet & Confer" process, further states:

DISCOVERY REQUESTS NOS. 1 –4.

Subject to the objections CMA has previously made, CMA will provide further non-privileged responsive information relative to these requests as the information becomes available in accordance with the ruling of the Hearing Officer. In further response to TAWC Request No. 4 relative to expert witnesses, CMA reasonably anticipates that it will use Brubaker & Associates, Inc. (Mike Gorman and Greg Meyer) for the purpose of providing expert

testimony. As CMA awaits TAWC's further responses to CMA's initial data requests, CMA cannot precisely identify all the topics for which it will file expert testimony; however, CMA anticipates filing testimony that addresses items regarding or in TAWC's rate base, expenses and revenues, the Company's allowed rate of return, and rate design. At this time, CMA does not anticipate it will submit expert testimony regarding TAWC's depreciation study, the management audit study or weather normalization. These conclusions are tentative, however, and may change as BAI and CMA receive more information from the Petitioner, analyze further the Petitioner's information, and/or coordinate areas of responsibility with the other intervenors.

DISCOVERY REQUEST NO. 7.

Subject to the objections CMA has previously made, CMA will provide workpapers *generated by* or relied upon by CMA's witnesses.

DISCOVERY REQUEST NO. 9.

Subject to the objections CMA has previously made, see the above response relative to Discovery Requests 1-4. Such information has not yet been developed or obtained by CMA or its attorneys, and CMA will supplement its response to the extent such non-privileged information becomes available in accordance with the instructions of the Hearing Officer.

DISCOVERY REQUEST NOS. 11-13:

Subject to the objections CMA has previously made, see the above response relative to Discovery Requests 1-4. CMA does not at this time expect to offer expert testimony on this issue.

Respectfully submitted,

GRANT KONVALINKA & HARRISON, P.C.

By: 

DAVID C. HIGNEY (BPR #14888)

CATHERINE HALL GIANNASI (BPR # 024441)

Attorneys for Intervenor

Chattanooga Manufacturers Association

Ninth Floor, Republic Centre

633 Chestnut Street

Chattanooga, Tennessee 37450-0900

- and -

BOULT, CUMMINGS, CONNERS & BERRY, PLC

HENRY M. WALKER (BPR #272)

1600 Division Street, Suite 700

P.O. Box 340025

Nashville, Tennessee 37203

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the method(s) indicated, on this the 13th day of June, 2008, upon the following:

☐ Hand-Delivery
☒ U.S. Mail
☐ Facsimile
☐ Overnight
☒ Email

Richard Collier
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 3 7243-00505

☐ Hand-Delivery
☒ U.S. Mail
☐ Facsimile
☐ Overnight
☒ Email

Ross Booher, Esq.
R. Dale Grimes, Esq
Bass, Berry & Sims, PLC
AmSouth Center
315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001

☐ Hand-Delivery
☒ U.S. Mail
☐ Facsimile
☐ Overnight
☒ Email

Michael A. McMahan, Esq.
Special Counsel
Nelson, McMahan & Noblett
801 Broad Street, Suite 400
Chattanooga, TN 37402

☐ Hand-Delivery
☒ U.S. Mail
☐ Facsimile
☐ Overnight
☒ Email

Robert E. Cooper, Jr., Attorney General
Timothy C. Phillips, Senior Counsel
Ryan L. McGehee, Assistant Attorney General
Office of the Attorney General
425 Fifth Avenue, North
P.O. Box 20207
Nashville, Tennessee 37202-0207

☐ Hand-Delivery
☒ U.S. Mail
☐ Facsimile
☐ Overnight
☒ Email

Harold L. North, Jr., Esq.
Frederick L. Hitchcock, Esq.
Chambliss, Bahner & Stophel, P.C.
1000 Tallan Building
Two Union Square
Chattanooga, TN 37402-2500


GRANT, KONVALINKA & HARRISON, P.C.