Little Committee of the

BASS, BERRY & SIMS PEC 24 PN 103

Attorneys at Law

A PROFESSIONAL LIMITED LIABILITY COMPANY DODINE ROOM OTHER OFFICE

R. Dale Grimes

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June 24, 2008

VIA HAND DELIVERY

Chairman Eddie Roberson, PhD c/o Ms. Sharla Dillon Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

> Re: Petition of Tennessee American Water Company To Change And Increase Certain Rates And Charge So As To Permit It To Earn

A Fair And Adequate Rate Of Return On Its Property Used And

Useful In Furnishing Water Service To Its Customers

Docket No. 08-00039

Dear Chairman Roberson:

Enclosed please find an original and seven (7) sets of copies of Tennessee American Water Company's Supplemental Response to the City of Chattanooga's Discovery Request No. 23, which was filed electronically today in Docket No. 08-00039. This document is designated "Confidential Information" pursuant to the Protective Order entered in this matter.

Please return three (3) copies of this Supplemental Response to me by way of our courier, which I would appreciate your stamping as "filed."

Should you have any questions concerning any of the enclosed, please do not hesitate to contact me.

With kindest regards, I remain

Very truly yours,

De Griner (bytta)

R. Dale Grimes

Enclosures

Chairman Eddie Roberson, PhD June 24, 2008 Page 2

cc: Hon. Ron Jones (w/o enclosure)

Hon. Sara Kyle (w/o enclosure)

Hon. Tre Hargett (w/o enclosure)

Ms. Darlene Standley, Chief of Utilities Division (w/o enclosure)

Richard Collier, Esq. (w/o enclosure)

Mr. Jerry Kettles, Chief of Economic Analysis & Policy Division (w/o enclosure)

Ms. Pat Murphy (w/o enclosure)

Timothy C. Phillips, Esq. (w/enclosure)

David C. Higney, Esq. (w/enclosure)

Henry M. Walker, Esq. (w/enclosure)

Michael A. McMahan, Esq. (w/enclosure)

Frederick L. Hitchcock, Esq., (w/enclosure)

Mr. John Watson (w/o enclosure)

Mr. Michael A. Miller (w/o enclosure)

TENNESSEE AMERICAN WATER COMPANY

DOCKET NO. 08-00039

CITY OF CHATTANOOGA'S

FIRST DISCOVERY REQUESTS

Responsible Witness:

Michael Miller

Question:

23. Besides Appendix 1 to the Direct Testimony of Joe Van den Berg, please provide

all Documents constituting, referencing containing, relating to, responding to, or

referring to other benchmarking studies or similar reports, performed by outside

consulting or benchmarking firms (for example, but not limited to: Gartner, Ernst

& Young, Towers-Perrin, Hackett, Saratoga, and industry or functional

associations), whether in draft or final form, with all associated documentation,

including, but not limited to definitions, instructions, data inputs, and

supplementary reports that have been initiated or completed for TAWC or and

TAWC Parent or Affiliate since January 1, 1997. The requested Documents

include, without limitation, all Documents constituting, referencing, containing,

relating to, responding to, or referring to internal analyses of these reports,

including, without limitation, remediation plans, schedules and progress reports

associated with follow-up for this work.

June 25, 2008 Supplemental Response:

In accordance with the discussions held during the June 20, 2008 hearing,

TAWC conducted a further examination of its files in an effort to locate a color

copy of the "Hackett Study" produced on June 18, 2008. TAWC has located a

color copy of the study, which it now produces as Confidential Information

pursuant to the Protective Order entered in this matter.

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 24th day of June, 2008, upon the following:

[] Hand-Delivery[] U.S. Mail[] Facsimile[] Overnight[x] Email	Timothy C. Phillips, Esq. Consumer Advocate and Protection Division Office of Attorney General 2nd Floor 425 5th Avenue North Nashville, TN 37243-0491
[] Hand-Delivery[] U.S. Mail[] Facsimile[] Overnight[x] Email	David C. Higney, Esq. Counsel for Chattanooga Manufacturers Association Grant, Konvalinka & Harrison, P.C. 633 Chestnut Street, 9th Floor Chattanooga, TN 37450
[] Hand-Delivery[] U.S. Mail[] Facsimile[] Overnight[x] Email	Henry M. Walker, Esq. Counsel for Chattanooga Manufacturers Association Boult, Cummings, Conners & Berry, PLC Suite 700 1600 Division Street Nashville, TN 37203
[] Hand-Delivery[] U.S. Mail[] Facsimile[] Overnight[x] Email	Michael A. McMahan, Esq. Special Counsel City of Chattanooga (Hamilton County) Office of the City Attorney Suite 400 801 Broad Street Chattanooga, TN 37402
[] Hand-Delivery[] U.S. Mail[] Facsimile[] Overnight[x] Email	Frederick L. Hitchcock, Esq. Harold L. North, Jr., Esq. Counsel for City of Chattanooga Chambliss, Bahner & Stophel, P.C. 1000 Tallan Building Two Union Square Chattanooga, TN 37402