

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

PETITION OF TENNESSEE AMERICAN)
WATER COMPANY TO CHANGE AND)
INCREASE 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 SERVICE TO ITS CUSTOMERS)

DOCKET NO. 08-00039

CITY OF CHATTANOOGA'S FIRST SUPPLEMENTAL
RESPONSES TO TENNESSEE AMERICAN WATER COMPANY'S
SECOND DISCOVERY REQUESTS

The City of Chattanooga ("City"), by and through its attorneys, submits the following supplemental responses to the Tennessee American Water Company's ("TAWC") Second Discovery Requests to the City:

DISCOVERY REQUEST NO. 1:

For each docket number listed on Appendix B to the testimony of Michael Majoros, please provide a thorough description of each topic addressed by Mr. Majoros in each docket (e.g. cost of service, depreciation rates, management fees, management audit, revenues, O&M expenses, etc.).

RESPONSIBLE WITNESSES: Michael Majoros

SUPPLEMENTAL RESPONSE NO. 1:

A CD numbered "COC-2ndDR1" with pages numbered 1 to 4016, Not Confidential, is attached hereto.

DISCOVERY REQUEST NO. 10:

On page 2 of his testimony, Mr. Stoffel states "I have researched and developed training that stresses benchmarking as a key component to successful management." Please produce all documents reflecting any such research and development, including any final training product or course materials produced in whole or part by Mr. Stoffel

RESPONSIBLE WITNESSES: Michael Majoros and Glynn Stoffel

SUPPLEMENTAL RESPONSE NO. 10:

A confidential set of documents containing proprietary class outlines declared by Mr. Stoffel is being produced to the parties and filed under seal pursuant to the Protective Order with the TRA named COC-2ndDRS10 – Confidential/Under Seal, Bates Numbers 1-385.

DISCOVERY REQUEST NO. 11:

On page 5 of Mr. Stoffel's pre-filed testimony in this docket, he refers to the 2005 AWWA "Benchmarking Performance Indicators for Water and Wastewater Utilities," and states that this report relies on 2003-2004 data. Please identify and produce a copy of the most current available version of the AWWA "Benchmarking Performance Indicators for Water and Wastewater Utilities."

RESPONSIBLE WITNESSES: Glynn Stoffel

SUPPLEMENTAL RESPONSE NO. 11:

Mr. Stoffel has recently obtained the AWWA 2006 survey data relating to "Benchmarking Performance Indicators for Water and Wastewater Utilities." (See attached). The median customer service cost of \$38.20 referenced in page 7 of his pre-filed testimony has dropped to a median of \$38.06. Sixty-two utilities contributed to this survey.

DISCOVERY REQUEST NO. 22:

Please provide any studies, reports, correspondence, City Council minutes, committee minutes, ordinances, resolutions, or other documents of any kind created from January 1, 2006 to the present and reflecting discussions with or requests to TAWC related to planning, proposing, or making capital improvements for reasons including, but not limited to: fire protection, downtown revitalization, service problems, economic development, or transportation improvements.

RESPONSIBLE WITNESSES: Randy Parker with the Chattanooga Fire Department; and Dennis Malone with the Department of Public Works

SUPPLEMENTAL RESPONSE NO. 22:

Enclosed is a CD dated 08/01/08 containing information relating to the City's fire hydrant status identified as COC-1stDR22, Bates Nos. 1-67 and the City's Public Works documents identified as COC-2ndDR22, Bates Nos. 1-37.

DISCOVERY REQUEST NO. 23:

Produce all documents, studies, proposals, or other communications in which the City or any of its departments, offices, agencies, officials, agents or any other of its representatives of any kind communicated with any representative of Volkswagen Group of America, Volkswagen AG, or any Volkswagen affiliate concerning water use or wastewater requirements for the planned Volkswagen manufacturing facility in the Chattanooga area.

RESPONSIBLE WITNESSES: Steve Leach, Administrator of the Department of Public Works and Jerry Stewart, Director of Waste Resources

SUPPLEMENTAL RESPONSE NO. 23:

The City of Chattanooga had no discussions with Volkswagen Group of America, Volkswagen AG or any Volkswagen affiliate concerning the use of water at the proposed manufacturing facility for the Volkswagen plant. This area is serviced by Eastside Utility District.

DISCOVERY REQUEST NO. 25:

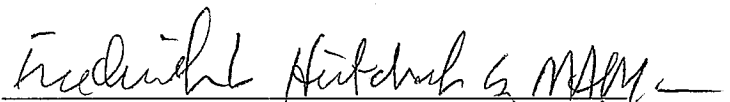

On page 2 of Mr. Stoffel's testimony, he states "In my role with Snavely, King, one of my duties is to benchmark the data obtained from various utilities to determine what level of best practices and potential efficiency they are attaining both internally and when compared to other utilities." Please produce any document containing any portion of any such benchmarking activities, including the workpapers, underlying data, and results of those benchmarking activities.

RESPONSIBLE WITNESSES: Glynn Stoffel and Michael Majoros

SUPPLEMENTAL RESPONSE NO. 25:

A document titled "New Jersey American Water Company Facilities Tour Report" Numbered COC-2ndDRS25, Bates Nos. 1-26 is attached.

Respectfully submitted,

By:  

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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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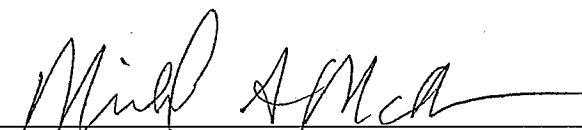
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This the 8th day of August, 2008.



Michael A. McMahan