

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

IN RE:

**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

**CHATTANOOGA MANUFACTURERS ASSOCIATION'S SUPPLEMENTAL
RESPONSE TO TENNESSEE AMERICAN WATER COMPANY'S
SECOND SET OF DISCOVERY REQUESTS, NUMBER 6**

The Chattanooga Manufacturers Association ("CMA"), by and through its attorneys, submits the following supplemental response to the Company's Second Set of Discovery, Request No. 6. CMA previously has set forth its objections generally and specifically applicable to TAWC's requests and reincorporates all said objections herein as if fully restated.

Subject to and without waiving any of the objections stated previously, including but not limited to CMA's objections to the question as unduly burdensome, overbroad, and irrelevant, CMA supplements its response as follows:

DISCOVERY REQUEST NO. 6:

Please provide the engagement letter, contract, any other correspondence and a schedule of fees paid by CMA to Michael Gorman or Brubaker Associates, Inc. during the last five years.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving all prior objections, any business prior to this case between Michael Gorman and Brubaker & Associates, Inc. and CMA conducted over the last

five years did not result in the development of positions taken in this case, nor produce discoverable evidence for this proceeding. Notwithstanding the objections, for purposes of this case, BAI has an oral agreement with CMA concerning its activities in this proceeding. BAI will bill for its services based on hourly billing rates, time spent, and out-of-pocket expenses. Hourly billing rates of BAI employees Michael Gorman, Greg Meyer, and Maggie Ackenhausen are \$205, \$135, and \$110, respectively, and the hourly billing rates of BAI's Analyst Department range from \$130 or less. BAI and CMA agreed orally that BAI would review and investigate filings by TAWC; assist with the conduct of discovery, as needed; respond to data requests, if necessary; assist with settlement negotiations or compromise positions (if any) offered by the Company; prepare analysis, workpapers, and direct testimony with schedules/exhibits on appropriate topics; and, consult and/or participate in rate hearings (if any); to the extent such services could be provided in an amount not to exceed \$50,000. BAI was paid approximately \$16,130 for services in TRA Docket No. 06-00290.

Respectfully submitted,

GRANT KONVALINKA & HARRISON, P.C.

By: 

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- and -

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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 August, 2008, upon the following:

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