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September 13, 2010

Via Hand Delivery

Chairman Mary W. Freeman
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Tennessee American Water Company's Management Audit*
Docket No. 09-00086

Dear Chairman Freeman:

Attached you will find an original and five (5) copies of Tennessee American Water Company's Motion for Entry of a Protective Order and Proposed Protective Order. These documents are also being filed today by way of email with the Tennessee Regulatory Authority Docket Manager, Ms. Sharla Dillon.

Please file the original and four copies of these documents and stamp the additional copies as "filed," and return the file-stamped copies to me by way of our courier.

Should you have any questions concerning this matter, please do not hesitate to contact me at the email address or telephone number listed above.

With kindest regards, I remain

Very truly yours,



R. Dale Grimes

RDG/smb

Enclosures

Chairman Mary W. Freeman
c/o Sharla Dillon
Tennessee Regulatory Authority
September 13, 2010
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cc: Hon. Eddie Roberson (w/o enclosures)
Hon. Sara Kyle (w/o enclosures)
Mr. David Foster (w/o enclosures)
Ryan McGehee, Esq. (w/o enclosures)
J. Richard Collier, Esq. (w/o enclosures)
Kelly Cashman-Grams, Esq. (w/o enclosures)
Rebecca Montgomery, Esq. (w/o enclosures)
Mr. John S. Watson (w/o enclosures)
Mr. Michael A. Miller (w/o enclosures)

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

IN RE:)	
)	
TENNESSEE AMERICAN WATER)	
COMPANY’S REQUEST FOR)	Docket No. 09-00086
PROPOSAL FOR A MANAGEMENT)	
AUDIT)	

**TENNESSEE AMERICAN WATER COMPANY’S
MOTION FOR ENTRY OF A PROTECTIVE ORDER**


Tennessee American Water Company (“TAWC”) hereby respectfully moves the Hearing Officer to enter the proposed Protective Order attached to this Motion as Exhibit A. Pursuant to the contract between TAWC and Schumaker & Company, which was approved by the TRA by Order entered March 24, 2010, TAWC is “responsible for filing one set of working papers with the TRA concurrent with the Management Audit Report.” TAWC considers certain items contained in the workpapers to be confidential and proprietary, and has treated them as such in providing them to Schumaker & Company. TAWC respectfully submits that to continue the protection of these items, a protective order should be entered in this matter. Concurrently with the filing of the Audit Report, TAWC is filing a disc containing all workpapers that are not considered confidential; however, the confidential material is not being filed until the entry of a protective order.

In order to simplify this matter, TAWC proposes the use of the same Protective Order that was entered on May 23, 2008, in TAWC’s 2008 Rate Case, TRA Docket No. 08-00039.

Accordingly, the proposed Protective Order attached as Exhibit A is an identical copy of the first Protective Order entered in that docket.¹

Therefore, TAWC respectfully requests the Hearing Officer to enter a Protective Order to protect confidential information in the form attached as Exhibit A.

Respectfully submitted,



R. Dale Grimes (#6223)
Ross I. Booher (#019304)
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*Attorneys for Tennessee American
Water Company*

¹ The only changes to the proposed Protective Order are the deletion of references to case specific intervenors named in the Protective Order entered in Docket No. 08-00039

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, overnight delivery and/or electronic mail, on this the 13th day of September, 2010, upon the following:

Ryan L. McGehee, Esq.
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email: Kelly.Grams@state.tn.us

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