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October 21, 2010

Mary Freeman, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Attention: Sharla Dillon

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. 10-00189

Dear Chairman Freeman:

Enclosed please find for filing in the above-referenced proceeding the "Comments of UWUA Intervenor on the Proposed Procedural Schedule and Location of Hearing."

Thank you for your attention to this matter.

Sincerely,



Scott H. Strauss
Katharine M. Mapes

Attorneys for UWUA Intervenor

Enclosures

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. 10-00189

**COMMENTS OF UWUA INTERVENORS ON
PROPOSED PROCEDURAL SCHEDULE AND
LOCATION OF HEARING**

Utility Workers Union of America, AFL-CIO, (“UWUA”) and UWUA Local 121 (referred to collectively as “UWUA”), intervenors in this proceeding, submit brief comments concerning (1) the procedural schedule in this matter; and (2) the location of the hearing.

Procedural Schedule. As stated at the October 18 prehearing conference, UWUA objects to a schedule under which intervenors are afforded a single week prior to the commencement of the hearing to (a) review and assess the entirety of the Company’s rebuttal presentation, and (b) to prepare for the hearing. In addition, a single week between the submission of the testimony and the hearing affords the UWUA and other intervenors no opportunity to conduct discovery with respect to the Company’s rebuttal presentation.

In addition to being plainly prejudicial to the intervenors, such a schedule is likewise contrary to the efficient use of Authority resources. With respect to the latter point, allowing discovery in advance of trial may well streamline the hearing process. The absence of an opportunity for pretrial discovery may mean time must be spent at the hearing asking questions that could and should have been addressed outside of the hearing room.

For these reasons, and those stated at the prehearing conference, UWUA ask that the Commission approve a procedural schedule that accords intervenors a fair opportunity both to assess and address the Company's rebuttal presentation.

Location of Hearings. UWUA supports the request of the Chattanooga Manufacturers Association ("CMA") that the hearings in this proceeding be held in Chattanooga. CMA correctly notes in its October 20, 2010, letter that Chattanooga is "where the company's customers live." It is also the place where the Company's employees perform their jobs. As was emphasized at Monday's hearing, TAWC's workforce is keenly in the outcome of this proceeding, which may impact both their compensation (*see* Direct Testimony of TAWC witness John S. Watson at 9:22-23) and their ability to provide safe and reliable water services to customers. UWUA therefore supports the convening of the evidentiary hearing in Chattanooga.

Respectfully submitted,

/s/ Mark Brooks

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AFL-CIO and UWUA Local 121

October 21, 2010

CERTIFICATE OF SERVICE

I, Scott H. Strauss, hereby certify that on the 21st day of October, 2010, I caused a copy of the foregoing Motion to Intervene to be served upon the Tennessee Regulatory Authority via electronic mail and upon the following parties of record by postage prepaid, first-class, U.S. mail.

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