

**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

**MOTION OF UWUA INTERVENORS FOR LEAVE TO SERVE MORE
THAN FORTY (40) DISCOVERY REQUESTS ON
THE TENNESSEE AMERICAN WATER COMPANY**

Pursuant to TRA Rule 1220-1-2-.11(5)(a), the Utility Workers Union of America, AFL-CIO (“UWUA”), and UWUA Local 121 (referred to collectively as “UWUA Intervenors”), hereby respectfully move for leave to serve upon the Tennessee American Water Company (“TAWC”) sixty-one (61) total discovery requests, including subparts, twenty-one (21) more than the forty (40) discovery requests authorized by Tennessee Regulatory Authority rules.

This Motion is accompanied by a Memorandum in Support and a copy of all of the proposed requests.

Respectfully submitted,

/s/ Mark Brooks

Mark Brooks
Attorney at Law
521 Central Avenue
Nashville, Tennessee
(615) 259-1186

TN BPR#010386

/s/ Scott H. Strauss

Scott H. Strauss
Katharine M. Mapes
Spiegel & McDiarmid LLP
1333 New Hampshire Ave, NW
Washington, DC 20036

Attorneys for Utility Workers Union
of America, AFL-CIO and UWUA
Local 121

November 1, 2010

CERTIFICATE OF SERVICE

I, Scott H. Strauss, counsel for UWUA Intervenors, hereby certify that on the 1st day of November, 2010, caused a true and correct copy of the foregoing Motion for Leave to Serve Additional Discovery Requests to be served upon all parties of record via U.S. mail or facsimile.

Michael A. McMahan
Valerie L. Malueg
Special Counsel
100 East 11th Street Suite 200
Chattanooga, TN 37402

Frederick L. Hitchcock
Harold L. North, Jr.
1000 Tallan Building
Two Union Square
Chattanooga, TN 37402

Mr. Vance L. Broemel
Mr. T. Jay Warner
Mr. Ryan L. McGehee
Office of the Attorney General
Consumer Advocate and Protection
Division
Cordell Hull Building, Ground Floor
425 5th Avenue North
Nashville, TN 37243

Mr. David C. Higney
Grant, Konvalinka & Harrison, P.C.
Ninth Floor, Republic Centre
633 Chestnut Street
Chattanooga, TN 37450-0900

Mr. R. Dale Grimes
Bass, Berry 7 Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201

Mr. Henry M. Walker
Boult, Cummings, Connors & Berry
PLC
1600 Division Street, Suite 700
Nashville, TN 37203

Chairman, Tennessee Regulatory
Authority
c/o Sharla Dillon, Dockets and Records
Manager
460 James Robertson Parkway
Nashville, Tennessee 37243

Donald L. Scholes
Branstetter, Stranch & Jennings PLLC
227 Second Avenue North
Fourth Floor
Nashville, TN 37201

/s/ *Scott H. Strauss*

Scott H. Strauss