BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:)		
)		
PETITION OF TENNESSEE-)	DOCKET NO.	
AMERICAN WATER COMPANY TO)	10-00189	
CHANGE AND INCREASE CERTAIN)		
RATES AND CHARGES)		

MOTION FOR LEAVE TO ISSUE MORE THAN EIGHTY DISCOVERY REQUESTS

The Consumer Advocate and Protection Division ("Consumer Advocate"), pursuant to TRA Rule 1220-1-2-.11(5)(a), hereby submits this motion requesting permission to issue more than eighty discovery requests to Tennessee American Water Company ("TAWC" or "Company"). Pursuant to TRA Rule 1220-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests and the discovery requests themselves.

RESPECTFULLY SUBMITTED,

T. JAX WARNER, BPR #26649

Assistant Attorney General

Office of the Attorney General and Reporter Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, TN 37202-0207

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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

Henry Walker Bradley Arant Boult Cummings, LLP 1600 Division St., Suite 700 Nashville, TN 37203

Frederick Hitchcock For the City of Chattanooga 1000 Tallan Building Two Union Square Chattanooga, TN 37402

Mark Brooks 521 Central Avenue Nashville, TN 37211 Donald L. Scholes Branstetter, Stranch & Jennings, PLLC 227 Second Avenue, North Fourth Floor Nashville, TN 37219

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

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

This the day of November, 2010.

T. JAY WARNER