

**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

**THE TOWN OF SIGNAL MOUNTAIN'S RESPONSES TO DISCOVERY REQUESTS
OF TENNESSEE AMERICAN WATER COMPANY**

The Town of Signal Mountain (the Town), by and through counsel, hereby serves its Responses to the Discovery Requests propounded by Tennessee American Water Company (TAWC).

DISCOVERY REQUEST NO. 1:

Identify each document that you anticipate you will rely on in opposition to the request(s) for relief, including any increase in rates, made by TAWC in TRA Docket No. 10-00189.

RESPONSE:

The Town has not yet identified any documents it intends to rely upon in opposition to TAWC's request for relief. The Town will supplement this response after receipt of TAWC's discovery responses and any such document is identified.

DISCOVERY REQUEST NO. 2:

Identify all persons known to you who have or claim to have knowledge, information, or possess any document(s) that support your answer to Discovery Request No. 1 above.

RESPONSE:

Honna Rogers, Town Manager, of Signal Mountain.. The Town will supplement this response after receipt of TAWC's discovery responses and any additional person is identified.

DISCOVERY REQUEST NO. 3:

Identify any person you intend to call as a fact witness, the subject matter of the witness' testimony, the substance and basis of the facts to be testified to, the data, documents, materials or other information shown to, relied upon, created by or considered by the witness as part of this case, any exhibits to be used by the witness, a full resume for the witness, the compensation to be paid for the testimony, and a listing of any other cases in which the witness has testified at trial or by deposition.

RESPONSE:

The Town has not yet decided who it may call as a fact witness. When the Town identifies any fact witness it intends to call, the Town will supplement this response.

DISCOVERY REQUEST NO. 4:

Identify any person you intend to call as an expert witness, the subject matter of the witness' testimony, the substance and basis of the facts and opinions to be expressed, the data, documents, materials or other information shown to, relied upon, created by or considered by the

witness as part of this case and/or as a basis in forming his or her opinions, any exhibits to be used as a summary of or support for each such opinion, the qualifications of the witness, including a full resume, a list of all publications authored by the witness, the compensation to be paid for the study and testimony, and a listing of any other cases in which the witness has testified at trial, by deposition or submitted written testimony.

RESPONSE:

The Town will not be calling an expert witness to testify in this case.

DISCOVERY REQUEST NO. 5:

Please identify and produce any and all engagement letters, expert reports and work papers (including drafts) created by or provided to any expert or other witness.

RESPONSE:

The Town will not be calling an expert witness to testify in this case.

DISCOVERY REQUEST NO. 6:

Please produce in electronic media (Word, Excel, or other Microsoft Office compatible format) and in hard copy all work papers and other documents, created by or relied upon by all Walden's Ridge witnesses.

RESPONSE:

The Town has not yet identified any documents it intends to rely upon in this case, but the Town will supplement this response when any such documents are identified.

DISCOVERY REQUEST NO. 7:

Please identify and produce a copy of all trade articles, journals, treatises, speeches and publications of any kind in any way utilized or relied upon by any of Walden's Ridge's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter as well as all articles, journals, speeches, or books written or co-written by any Walden's Ridge witness.

RESPONSE:

The Town will not be calling an expert witness to testify in this case.

DISCOVERY REQUEST NO. 8:

Please identify and produce any and all documentation, items, reports, data, communications, and evidence of any kind that Walden's Ridge intends to offer as evidence at the hearing or to refer to in any way at the hearing.

RESPONSE:

The Town has not yet identified any documentation it intends to rely upon in opposition to TAWC's request for relief. The Town will supplement this response after receipt of TAWC's discovery responses and any such documentation is identified.

DISCOVERY REQUEST NO. 9:

If you believe that TAWC has made any admission or statement against interest that contradicts the request(s) for relief, including any increase in rates, made by TAWC in TRA Docket No. 10-00189, please state with specificity any and all admissions or statements against interest allegedly made by TAWC. For each such admission or statement against interest state:

- a. The identity of the person making each admission or statement;
- b. The location where each admission or statement was made;
- c. The date and time each admission or statement was made;
- d. The identity of all persons present when each admission or statement was made;
and
- e. Identify all documents which refer or relate to each admission or statement and
attach copies of said documents hereto.

RESPONSE:

The Town is not aware of any such admission or statement against interest made by TAWC.

DISCOVERY REQUEST NO. 10:

Please identify, other than your attorneys, each person who provided information or participated in the preparation of the responses to each of these discovery requests, and for each such person specify the responses for which he or she provided information or participated in preparing.

RESPONSE:

Honna Rogers, Town Manager of Signal Mountain, participated in preparing all the responses to these discovery requests.

DISCOVERY REQUEST NO. 11:

Identify all persons with whom you consulted prior to answering these discovery requests.

RESPONSE:

Honna Rogers, Town Manager of Signal Mountain.

DISCOVERY REQUEST NO. 12:

Please identify all documents reviewed by you to respond to these discovery requests.

RESPONSE:

The Town has reviewed the TAWC rate petition and certain portions of documents filed with the TRA in this case.

DISCOVERY REQUEST NO. 13:

Produce all documents identified or specified in your answers or responses to the discovery requests.

RESPONSE:

No such documents have been identified or specified other than those on file with the TRA. The Town will supplement its response when any such documents are identified.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response was served via first class U.S. Mail and electronic mail on November 17, 2010, upon:

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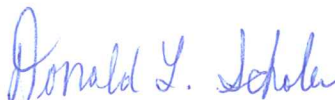
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