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December 8, 2010

Via Hand-Delivery

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

filed electronically in docket office on 12/08/10

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 the original and five (5) copies of Tennessee American Water Company's December 8th Supplemental Responses to the City of Chattanooga's First Discovery Requests. A compact disk is being provided in the binder of each set of copies. This disk contains all responses and attachments, as well as attachments included only in electronic form, due to volume or specific instructions in the data requests. We are including a disk marked "Docket Manager Disc," which contains the entire filing in PDF format, excluding Excel spreadsheets. This material is also being filed today by way of email to the Tennessee Regulatory Authority Docket Manager, Sharla Dillon.

Please file the original and four copies of this material and stamp the additional copy as "filed". Then please return the 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 Freeman

December 8, 2010

Page 2

cc: Hon. Sara Kyle (*w/o enclosure*)
Hon. Eddie Roberson (*w/o enclosure*)
Mr. David Foster, Chief of Utilities Division (*w/o enclosure*)
Richard Collier, Esq. (*w/o enclosure*)
Mr. Jerry Kettles, Chief of Economic Analysis & Policy Division (*w/o enclosure*)
Ryan McGehee, Esq. (*w/enclosure*)
Mary L. White, Esq. (*w/enclosure*)
David C. Higney, Esq. (*w/enclosure*)
Henry M. Walker, Esq. (*w/enclosure*)
Michael A. McMahan, Esq. (*w/enclosure*)
Valerie L. Malueg, Esq. (*w/enclosure*)
Frederick L. Hitchcock, Esq. (*w/enclosure*)
Harold L. North, Jr., Esq. (*w/enclosure*)
Mark Brooks, Esq. (*w/enclosure*)
Scott H. Strauss, Esq. (*w/enclosure*)
Katharine M. Mapes, Esq. (*w/enclosure*)
Donald L. Scholes, Esq. (*w/enclosure*)

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: George Conroy

Question:

14. Please provide a schedule of all fees or charges billed to, charged to, owed by, accrued by, or paid by *TAWC* for expenses classified as Management Fees, *Identifying* for each such fee or charge its total amount; any discount allowed or taken; its nature; its purpose; the business unit or entity providing it; and the entity, functional area, business unit, or service provider by month for the period January 1, 2007 to present. In this schedule, please *identify* the budget for each Management Fee or charge, the corresponding actual expenditure, the variance calculation, and detailed variance explanation, by month for the period.

Response:

Please see the attached document labeled as TN-COC-01-Q14-ATTACHMENT for actual Tennessee monthly Service Company charges by function, business unit and object account excluding capital costs for 2007 through September 2010.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q14.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q014.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: David Weber

Question:

16. Please provide a schedule *Identifying* for January 1, 2007 to present (i) the number of FTE's provided by contractors, by function, by *AWWSC*; (ii) the original approved budgeted FTE's for each functional category of employees, and (iii) the actual FTE's for each functional category of employees these periods.

Response:

The Company objects to this question on the grounds that the question is overly broad and unduly burdensome, and requests information not in the possession of the Company. Notwithstanding the objection, the Company does not track the number of employees or FTE's whom contractors may employ in meeting their contractual obligations to AWWSC. Please see the attachment, identified as TN-COC-01-Q16-ATTACHMENT which provides the AWWSC actual and budgeted amount of costs associated with contracting outside services for 2007, 2008, 2009, and YTD Sep 2010.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q16.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q016.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: George Conroy

Question:

43. Please *Identify* all monthly amounts paid by *TA WC* since January 1, 2007, to *AWWC* or any *AWWC* subsidiary or affiliate, and provide the information as to each such amount in the following format:

Payment Date	Amount of Payment	Purpose of Payment	If Payment for Services, Amount of Time Reflected in Charge	Hourly Rate Change	If for Equipment of Materials, Description of Each Piece of Equipment or Material	Unit Charge for Each Piece of Equipment or Material	Agreement Under Which Provided (89 Service Agreement or Other)

Response:

The Company objects to this question on the grounds that it is unduly burdensome, requests information neither readily available nor in the format requested, and in part is not relevant to the current proceeding.

COC's request involves a voluminous amount of data, which was already provided to the COC in the previous case. Please see the response to TN-COC-01-10 in Docket No. 08-00039.

Also, see the response to TRA-01-Q014, which provides additional information about payments to AWWSC, AWCC and AWR (formerly known as American Anglian Technologies). In addition, see the response to TN-COC-01-Q61 that also provides data responsive to this request.

Please see the attached file identified as TN-COC-01-Q43-ATTACHMENT which presents total Service Company hours and charges for TAWC for the years 2005 through September 2010 and the associated full-time equivalent positions allocated to TAWC by function. TN-COC-01-Q43 Attachment includes a summary schedule that shows the yearly totals and FTE's by function. The other schedules provide a breakdown of the charges by month for the years 2005 through 2010.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q43.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q043.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: George Conroy

Question:

61. With respect to all expenses allocated to *TAWC* by *A WWC, A WWSC, AWR, AWCC*, or any other subsidiary or affiliate of any of them, please provide for 2006, 2007, 2008, 2009, the test year, the normalization period, and the attrition period and as projected for 2010 and 2011, the total dollars charged by each company, affiliate, or subsidiary, the NARUC account number to which such expenses were recorded, the allocation factor or method applied to each such expense account, and a complete description of the allocation factor or method. Provide all *Workpapers* and supporting *Documents* used to develop this response.

Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. To comply with this request would literally require the Company to provide copies of hundreds of thousands (if not millions) of invoices and payroll charges at an astronomical cost which the Company does not believe is necessary or reasonable in establishing the fair and reasonable rates of the Company in this case. Without waiving these objections, please see the attached file labeled TN-COC-01-Q61-ATTACHMENT that contains allocated and direct charges to AWWSC from AWWSC and other affiliates for the periods requested. Further, the TRA ordered the Company to provide a Management Audit of AWWSC, which included an audit of a statistically valid sample of the transactions supporting the costs of AWWSC charged to TAWC. The Management Audit, including the audit of AWWSC's transactions costs has

been provided as Exhibit MAM-8 to Mr. Miller's direct testimony. Finally, the Company's records are located in its office in Chattanooga, and the offices of AWWSC in Voorhees, NJ. The Company is willing to make available the millions of documents supporting these charges to the City if they choose to review them at their cost.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q61.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q061.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: Lori O'Malley

Question:

63. Please *Identify* for each year since January 1, 2003, the number of employees by position at the National Call Centers and for each position set forth the unburdened base hourly wage or salary rate (without overheads). In the event there is more than one base hourly rate for each position, provide the average and median base hourly rates for each such position.

Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, please see the attached document labeled as TN-COC-01-Q63-ATTACHMENT that lists the number of employees by position at the National Call Centers and their corresponding hourly rates at year end 2005-2009. The Company replaced its accounting system in 2005 and therefore, the data for 2003-2004 is not readily available using the Company's current accounting system.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q63.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q063.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: Jim Bozman

Question:

64. *Identify* and provide all *Documents* constituting, reporting, or referring to call center operating statistics and reports that are prepared for management of *TAWC*, *AWWSC*, or any other subsidiary or affiliate of *AWWC* relating to, referring to, or concerning the efficiency, effectiveness, or other aspects of the operations of the call centers, including, without limitation, such information for operations related to *Non-Regulated Services* or other activities of non-regulated operations and companies served by the call centers.

Response:

The Company objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, operational productivity and service quality at the call centers are monitored and tracked with the following reports: 1) CSC Managing Directors Report, 2) Service Level Targets Report, and 3) Call Handling Data - Skill by Month Report. These three reports are attached to this response identified as TN-COC-01-Q64-ATTACHMENT. In addition, the Management Audit attached to Mr. Miller's direct testimony as Exhibit MAM-8 has substantial discussion and findings regarding the Call Center Statistics, trends, findings and recommendation.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q64.xls.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q064.xls

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: John Watson

Other Participating Employees: Jim Bozman

Question:

65. Please provide the number of customers for all water and wastewater operations of *TAWC* and other *AWWC* subsidiaries and affiliates, by company, for each of the years 1999 through 2009, each month of 2010 and as projected for 2010 and 2011.

Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, please see the attached document identified as TN-COC-01-Q65-ATTACHMENT.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q65.xls.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q065.xls

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller/John Watson

Other Participating Employees: George Conroy/Sheila Miller

Question:

69. Describe all business development projects any portion of which was charged to *TAWC* during for 2006, 2007, 2008, 2009, the test year, the normalization period, the attrition period each month of 2010 and as projected for 2010 and 2011; state the amount of the charges to *TAWC*; and for each such project *Explain* how these charges benefited ratepayers of *TAWC*.

Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome. Without waiving these objections, see the list of completed and on-going business development projects related to operation in Tennessee identified as TN-COC-01-Q69-ATTACHMENT. The business development activities are primarily handled by the Manager of Business Development (“BD”) at the Eastern Division of AWWSC who splits his time between activities in Tennessee and Kentucky, and the Director of BD at the Eastern Division who splits his time between the nine states that comprise the Eastern Division of AWWSC. In addition, there are support personnel at both AWWSC and the Eastern Division that assist in the preparation of models and other information specific to the projects for TAWC. The time and expenses related to BD are provided in the response to TN-COC-01-Q14-ATTACHMENT under the business unit for business development for each year 2007-2010. For easy reference, the totals for BD activities in TAWC for 2007-2010, and for the historical test-year and attrition year are shown below.

2007 - \$99,318

2008 - \$42,555

2009 - \$71,892

2010 (forecast) - \$74,360

HTY 3-31-10 - \$78,677

Attrition Year - \$81,037

Growth in revenues and customers from BD activities directly benefit the customers in a number of ways. The addition of new customers permit the spreading of fixed costs over a larger customer base incrementally lowering the cost to each customer, and revenue and earnings from BD growth directly lower the overall revenue requirement for all customers. The Company's BD activities have resulted in new bulk sales to Walden's Ridge, the acquisition of the former Suck Creek Utility District and the operation agreement with Lone Oak Utility District which have directly lowered the cost to the other customers of TAWC as described above. The BD activities have also led to renewal of existing bulk sales contracts, and the identification of potential growth opportunities that if implemented will benefit existing TAWC customers.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q69.xls.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q069.xls

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: George Conroy

Question:

71. Provide all 2008, 2009, and 2010 travel and entertainment vouchers and receipts associated with charges to the following business units: CORP-Government Affairs, CORP External Affairs, CORP-Marketing, CORP-External Communications, CORP-Internal Communications, CORP-Corp Social Resp, WE-External Affairs, Business Transformation, and CORP-Investor Relations.

Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, see the attached spreadsheet identified as TN-COC-01-Q71-ATTACHMENT 1 for a listing of travel and entertainment expenses for the business units requested. The attachment identified as TN-COC-01-Q71-ATTACHMENT 2 contains copies of invoices for all paid voucher payment types (labeled PV on the report). See the response to TN-TRA-01-Q013 at TRA-01-Q013-MANAGEMENT FEES, pages 1, and 2-8 of 12 for detail of the p-card charges the Company eliminated from the historical test-year management fee expense as part of this rate case.

The Company is not providing the receipts for payments using Company purchasing cards (labeled CC on the report) due to the enormous number of receipts. The Company is willing to make this data available to the City for review at the AWWSC offices where the information is kept.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q71.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q071.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: George Conroy

Question:

72. Please describe the services provided to *TAWC* for each month of 2008 and 2009 and as projected for 2010 and 2011 which are associated with the charges from "Business Transformation" business unit. *Explain* how these costs were allocated or changed to *TAWC* and precisely the work performed. Provide all travel and entertainment vouchers and receipts associated with charges to this business unit.

Response:

The Business Transformation project is an initiative to identify the investments necessary to replace aged business systems and improve our core business processes. The activities that are being carried/will be carried out to properly plan and manage this project include:

- Review and analyze ‘as-is’ process models, performance metric data and other documentation to establish a baseline.
- Conduct workshops, interviews and site visits to other companies to identify potential ‘to-be’ processes and communicate to stakeholders.
- Develop and document ‘to-be’ business requirements.
- Develop ‘to-be’ process models.
- Perform a gap analysis between ‘as-is’ and ‘to-be’ process models. Assess and document the impact of change on the business as it relates to job roles and responsibilities, capability requirements, and job skills.
- Prioritize process improvements.
- Obtain stakeholder acceptance of the ‘to-be’ process model and business requirements.

- Visit other companies to assess technology choices and determine technology requirements and impact to software selection.
- Prepare request for proposal for solicitation of software.
- Prepare a Business Case including estimate of benefits and cost of process improvement initiatives and technology solutions.
- Select system software platform.
- Hire system implantation partner to help build new processes and utilize new software solutions.
- Design and build and test new systems processes.
- Conduct formal training sessions to teach employees the new processes and software.
- Install software and begin new processes.

The costs for these services are being allocated to TAWC and other companies based on customer count formulas. The majority of the costs are currently being capitalized.

Please see attached document labeled as TN-COC-01-Q72-ATTACHMENT for the current and projected costs of the business transformation project for the period requested, as well as voucher level detail for travel and entertainment expenses.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q72.xls.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q072.xls

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: Lori O'Malley

Question:

73. *Identify* each employee, by unique *Identifying* number, at the Local Service Center and National Service Center service level that allocated or directly charged costs to *TAWC* during 2008 and 2009 and as projected for 2010 and 2011.

Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, the Company does not maintain the information in the format requested in the ordinary course of its business. Please see the attachments identified as TN-COC-01-Q73-ATTACHMENT 1 and TN-COC-01-Q73-ATTACHMENT 2, that list employees at the Customer Service Centers that allocated or directly charged costs to TAWC during 2008 and 2009. Please also refer to the response to TN-CAPD-01-PART III-Q41 for a list of employees as of September 30, 2010. A projected list of employees for 2011 is not readily available since the company has not yet completed the 2011 budget. The Company's attrition year management fees were determined based on reasonable projections of cost increases and elimination of non-recurring expenses and expenses not normally recovered in rates as provided in the response to TN-TRA-01-Q013, at TRA-01-Q013-MANAGEMENT FEES, pages 1-12 of 12.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q73.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q073.xlsx

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Michael A. Miller

Other Participating Employees: Lori O'Malley

Question:

80. Please provide for all companies that charge salaries and wages to *TAWC*, a breakdown of the total amount of gross payroll and employee benefit costs (by benefit type) for the test year, the prior two historical years, the normalization year, the attrition year and as projected for 2010 and 2011 and between amounts expensed and amounts capitalized, and provide the percentage of payroll and employee benefits (by benefit type) charged to expense for each year. Provide all *Workpapers* and *Documents* supporting, referring to, or related to the requested information.

Response:

The Company objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information the Company does not maintain in the format requested. The Company further objects that the request is vague and ambiguous. Without waiving these objections, however, please see the attached schedule, identified as TN-COC-01-Q80-ATTACHMENT. A breakdown of AWWSC labor and benefits charged to TAWC is provided for the test year, 2008, 2009, the attrition year and projected for 2010. The normalization year is the same period as the test year. Projected 2011 information is not available in the format requested. Also see the responses to TN-COC-01-Q75 and Q76 for information on how the attrition year management fees were determined.

The breakdown of labor between capital and expense is provided. Employee benefit overheads are distributed based on the allocation of labor dollars providing the same capitalization percentage as that of labor.

December 8, 2010 Supplemental Response:

Attachment(s) previously provided in response to this request in PDF format that are Excel files are enclosed on the accompanying CD labeled as TN-COC-01-Q80.xlsx.

This file has been produced natively on the accompanying disk:

TN-COC-01-Q080.xlsx

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

**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

AFFIDAVIT

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA

I, MICHAEL A. MILLER, Treasurer/Comptroller for Tennessee American Water Company, do hereby certify that the foregoing responses to the First Supplemental Responses to the City of Chattanooga's Data Requests #14, 16, 43, 61, 63, 64, 65, 69, 71, 72, 73, and 80 were prepared by me or under my supervision and are true and accurate to the best of my knowledge and information.

DATED this 8th day of December, 2010.

Michael A. Miller
(signature)

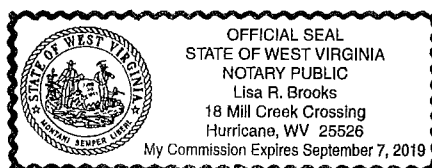
MICHAEL A. MILLER
(printed name)

Sworn to and subscribed before me this 8th day of December, 2010.

Lisa R. Brooks
NOTARY PUBLIC

My Commission Expires:

September 7, 2019



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by way of the method(s) indicated, on this the 8th day of December, 2010, upon the following:

<input checked="" type="checkbox"/> Hand-Delivery	Ryan McGehee, Esq.
<input type="checkbox"/> U.S. Mail	Mary L. White, Esq.
<input type="checkbox"/> Facsimile	Counsel for the Consumer Advocate
<input type="checkbox"/> Overnight	and Protection Division
<input checked="" type="checkbox"/> Email	OFFICE OF THE ATTORNEY GENERAL
	425 5th Avenue North, 2nd Floor
	Nashville, TN 37243-0491
<input type="checkbox"/> Hand-Delivery	David C. Higney, Esq.
<input type="checkbox"/> U.S. Mail	Counsel for Chattanooga Regional
<input type="checkbox"/> Facsimile	Manufacturers Association
<input checked="" type="checkbox"/> Overnight	GRANT, KONVALINKA & HARRISON, P.C.
<input checked="" type="checkbox"/> Email	633 Chestnut Street, 9th Floor
	Chattanooga, TN 37450
<input checked="" type="checkbox"/> Hand-Delivery	Henry M. Walker, Esq.
<input type="checkbox"/> U.S. Mail	Counsel for Chattanooga Regional
<input type="checkbox"/> Facsimile	Manufacturers Association
<input type="checkbox"/> Overnight	BRADLEY, ARANT, BOULT, CUMMINGS, PLC
<input checked="" type="checkbox"/> Email	1600 Division Street, Suite 700
	Nashville, TN 37203
<input type="checkbox"/> Hand-Delivery	Michael A. McMahan, Esq.
<input type="checkbox"/> U.S. Mail	Valerie L. Malueg, Esq.
<input type="checkbox"/> Facsimile	City of Chattanooga (Hamilton County)
<input checked="" type="checkbox"/> Overnight	OFFICE OF THE CITY ATTORNEY
<input checked="" type="checkbox"/> Email	100 East 11 th Street, Suite 200
	Chattanooga, TN 37402
<input type="checkbox"/> Hand-Delivery	Frederick L. Hitchcock, Esq.
<input type="checkbox"/> U.S. Mail	Harold L. North, Jr., Esq.
<input type="checkbox"/> Facsimile	Counsel for City of Chattanooga
<input checked="" type="checkbox"/> Overnight	CHAMBLISS, BAHNER & STOPHEL, P.C.
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	Two Union Square
	Chattanooga, TN 37402

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Mark Brooks, Esq.
Counsel for Utility Workers Union of America,
AFL-CIO and UWUA Local 121
521 Central Avenue
Nashville, TN 37211

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Scott H. Strauss, Esq.
Katharine M. Mapes, Esq.
Counsel for UWUA, AFL-CIO and UWUA Local 121
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Washington, DC 20036

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12.12 Munnies