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**VIA HAND DELIVERY**

filed electronically in docket office on 02/08/11

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

**Re: Docket No. 10-00189: *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***

Dear Chairman Freeman:

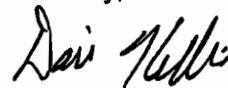
Enclosed please find an original and five (5) sets of copies of Tennessee American Water Company's Rebuttal Testimony filed on behalf of the following witnesses: Bernard L. Uffelman, James H. Vander Weide, James I. Warren, Sheila A. Miller, Patrick L. Baryenbruch, Paul R. Herbert, Dr. Edward L. Spitznagel, John S. Watson and Michael A. Miller.

Two disks are included with this submission. The first disk, labeled "Docket Manager Disk" contains PDF images of the testimony of each witness. The second disk contains all of the documents submitted in their native formats.

Please file the original and four copies of this Rebuttal Testimony and stamp the additional copy as "filed." Then please return the stamped copy 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.

Sincerely,



David Killion

Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
DOCKET NO. 10-00189**

**FEBRUARY 8, 2011**

**NON-CONFIDENTIAL  
REBUTTAL TESTIMONY:  
JOHN S. WATSON**

**ON BEHALF OF TENNESSEE AMERICAN WATER COMPANY**

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1                                   **Tennessee-American Water Company**  
2   **Case No. 10-00189**

3  
4                                   **Rebuttal Testimony**  
5   **John S. Watson**

6  
7   **Q. Please state your name and business address?**

8   A. My name is John S. Watson and my business address is 1101 Broad Street,  
9       Chattanooga, Tennessee, 37402.

10  
11   **Q. Mr. Watson have you filed testimony in this rate case?**

12   A. Yes, I filed direct testimony in this case (TRA Docket No. 10-00189) on behalf of  
13       Tennessee American Water Company ("TAWC").

14  
15   **Q. What is the purpose of your testimony?**

16   A. To provide rebuttal testimony in response to the testimony filed by the Intervenor's  
17       witnesses regarding the basis and need for TAWC's rate request which is necessary  
18       for TAWC to both serve its customers and provide an appropriate level of return to its  
19       shareholders.

20  
21                                   **DECISION TO SEEK A RATE INCREASE**

22  
23   **Q. As a preliminary matter, can you please describe the process that leads to the**  
24       **Company's decision to seek a rate adjustment?**

25   A. Regulated water utilities make investments into their water systems so that they can  
26       continue servicing their customers and do so in full compliance with all the  
27       requirements imposed on water utilities. Making these capital investments comes at a  
28       cost, and if the Company cannot recover its investment and operating costs to the  
29       degree necessary to achieve a reasonable return on these investments, then I, as  
30       TAWC's President, along with the Officers and Directors, have an obligation to seek  
31       a rate adjustment.

1 The decision to seek a rate increase begins with an examination of the Company's  
2 business plan. The Company's business plan takes into account the entirety of its  
3 operations, including all of the requirements, standards and regulations that are  
4 imposed on it, expectations about its operating costs, revenues, its investments, the  
5 financing of long-term and short-term debt and infusion of equity, organic growth of  
6 the water system, and its capital investment program needs. Additionally, we give  
7 consideration to how the business and its customers may be affected by future  
8 regulations and rules. Water utilities are impacted by emerging issues and trends  
9 such as U. S. EPA Contaminant Candidate List, the oversight of regulatory changes  
10 on issues such as fluoridation, development of additional perchlorate regulations, the  
11 regulation of MTBE, consideration of the occurrence of pharmaceuticals in drinking  
12 water, and other salient issues. Furthermore, water utilities' operations are impacted  
13 by reports such as the *Clean Water and Drinking Water Infrastructure Gap Analysis*  
14 published by the U. S. EPA and the American Society of Civil Engineers Report Card  
15 for America's Infrastructure.

16  
17 Mr. Miller reviews the Company's business plan and advises me when the business  
18 plan necessitates additional rate recovery. We use a very rigorous process to review,  
19 at least monthly, the Company's financial performance. In doing so, we must analyze  
20 individual expenses, the costs of supplies and materials, and other services we must  
21 obtain externally in the marketplace. We continually strive to reduce these costs. If  
22 that is not possible, then we seek to contain the costs and work on improving  
23 efficiencies, improving work methods, using technology to increase productivity, and  
24 making capital investments to replace and upgrade the assets and equipment that are  
25 essential to our ability to provide quality service. If the Company still cannot recover  
26 its investment and operating costs to the degree necessary to achieve a reasonable  
27 return on its capital investments, then a rate increase becomes necessary.

28  
29 If this is the case, Mr. Miller and I jointly report to the Board of Directors of  
30 Tennessee American on the business plan and the recommendation to seek rate relief.  
31 We also advise on the duration and the impact of a rate request and identify the steps

1 taken to address the shortfall as well as those steps necessary to request a recovery of  
2 expenses, investments in plant assets, property and equipment through water rates.

3  
4 These are the same processes and considerations that were used to reach the decision  
5 to file this rate request.

6  
7 **EMPLOYMENT LEVELS**  
8

9 **Q. In this rate request, Tennessee American has requested authorization for 110**  
10 **employees. How did the Company determine the proper level of employees to**  
11 **include in its petition?**

12 A. TAWC's employee number is derived from the number of employees the Company  
13 needs to provide the appropriate level of service. The decision also involves detailed  
14 considerations of work practices, workloads, necessary capital investments planned in  
15 the year, and whether there are efficiencies that can be achieved by employing other  
16 technology in lieu of employing personnel. The employee level is also influenced by  
17 our review of the quantity of subdivisions and multi-family housing planned, business  
18 development and re-development, as well as the various expected municipal, county  
19 and state agency planning activities that will require TAWC to move, upgrade, or  
20 remove facilities during that budget cycle.

21  
22 The decision to create new positions or hire additional personnel is driven by  
23 consumer demands and expectations and only implemented after a careful assessment  
24 of present and future demand. For example, when TAWC service metrics in 2005  
25 evidenced that the Company required more management and support level staff to  
26 maintain and improve the provision of water service to its customers, TAWC  
27 undertook to hire thirty-seven additional employees over the course of the next 3½  
28 years. Likewise, the Company has lost employees due to retirements over the course  
29 of the past 6 years from its aging workforce and due to unforeseeable events such as  
30 illness, accident, disciplinary action, and in one case the untimely death of an active  
31 employee.

1  
2 The Company also must consider the skill set of its existing workforce to determine  
3 whether it has the appropriate complement of employees to fulfill the requisite duties  
4 and service obligations that are required. If the workforce does not have the needed  
5 skill sets, Tennessee American management must then work to find individuals who  
6 possess the correct skills sets and educational background required by particular  
7 technical and professional positions.  
8

9 **Q. How does this compare with the CAPD's witness, Mr. Buckner's, assessment of**  
10 **TAWC's workforce?**

11 A. Mr. Buckner recommends a significant reduction in TAWC's workforce to a level of  
12 104 employees. This would seriously compromise TAWC's ability to provide quality  
13 water service to its customers. Moreover, the downward "headcount" adjustment  
14 recommended by Mr. Buckner is contradictory to the direct testimony of CAPD  
15 witness Michael Chrysler in TAWC Docket 06-00290. In that case, Mr. Chrysler  
16 complemented TAWC for its service metrics reporting, its level of service, and its  
17 prompt responses to customers that were illustrated in the metrics and even stated that  
18 those metrics were a model for other utilities.  
19

20 In this case, Mr. Buckner seeks to remove positions for a professional engineer  
21 project manager (the only company employee required to hold a Tennessee  
22 professional engineering license.), a senior management position (Field Service  
23 Superintendent), and a Master Maintenance Mechanic (a position which requires  
24 electrical and electronics certification). The removal of some of these positions  
25 would seriously undermine the ability of Tennessee American to serve its customers,  
26 design and construct water utility facilities, perform maintenance on its assets,  
27 operate the water treatment plant and the nearly 1300 miles of distribution assets, read  
28 water meters, and perform all of the additional functions that are necessary for the  
29 Company to meet its public service obligations.  
30

1 **Q. What would be the impact to TAWC and its ability to provide service to its**  
2 **customers if Mr. Buckner's recommendation were adopted?**

3 A. Mr. Buckner's recommendation would essentially increase overtime for hourly  
4 employees. Mr. Buckner also recommended the elimination of six positions. Mr.  
5 Buckner is effectively claiming that the functioning of the six positions at issue  
6 should not be performed by anyone. If no one performs these functions, there would  
7 be decreases in service, water quality, or other consequences of not fulfilling the  
8 responsibilities of these posts.

9  
10 Mr. Buckner does not face the day-to-day requirement of having to ensure that the  
11 Company has the resources necessary to meet the public's demands for water service  
12 and perform the Company's public obligation to provide water service at all times.  
13 The Company will not be in a position to consistently deliver the standard of service  
14 expected of it going forward without a full complement of employees.

15  
16 **Q. What was Mr. Buckner's methodology in justifying his recommendation?**

17 A. Mr. Buckner states that the "The Consumer Advocate rejects TAWC's projection of  
18 employee levels because TAWC continues to demonstrate in case after case an  
19 overstated number of employees when compared to what they actually keep on the  
20 payroll." (Bucker at 4, lines 14-19). Mr. Buckner fails to recognize that even though  
21 there are vacancies, the work that is to be completed by those vacant positions must  
22 still be completed by someone. To perform this work the Company has had to  
23 increase overtime work for its existing employees, contract out the work, or hire  
24 temporary help, all depending on the particular work. If it is determined that  
25 workload levels are decreased, it becomes prudent to hold the vacancy open until the  
26 workload level returns to normal or increases. By way of example, the retirement of  
27 former Project Manager Randy Taylor required the Company to assign his work to its  
28 outside consulting engineering firms. Likewise, the retirement of Field Service  
29 Superintendent Monty Bishop required the Company to temporarily employ the  
30 services of Dillard Griffin, a Kentucky American Water employee. TAWC is  
31 reimbursing Kentucky American for the associated labor, payroll taxes, group

1 insurance, pension, and travel and temporary living expenses of the assignment of  
2 Mr. Griffin until the vacant positions are filled. Mr. Doug Brock, the Director of the  
3 Field Resource Command Center in Lexington , KY, is also functioning as temporary  
4 Field Service Superintendent for TAWC until the vacancies are filled.

5  
6 Simultaneous with seeking outside help to perform these functions, TAWC has  
7 posted the vacant positions both internally and externally. At this time, all initial  
8 interviews have been completed and final candidate selection is expected by February  
9 15. Subject to the completion of pre-employment checks, we will be announcing the  
10 replacement Project Manager and Field Service Superintendent employee names and  
11 hire dates on or before February 28, 2011.

12  
13 **Q. Please address Tennessee American's response to Mr. Buckner's methodology**  
14 **for recommending an average employment level of 104 employees.**

15 A. We disagree strongly with Mr. Buckner's adjustment and analysis. Mr. Buckner did  
16 no analysis of the other expenses that the Company paid or continues to incur, but  
17 simply instead makes the false claim that "water rates should not be set on employee  
18 levels that are never sustained". (Buckner at 4, lines 19-20). Mr. Buckner's basis  
19 for establishing the appropriate level of employees or expense during the attrition  
20 year is incorrect in light of TAWC's service obligation and regulatory requirements  
21 and completely disregards the other operation and maintenance expenses the  
22 Company has incurred that are independent of its labor expenses. It is not simply the  
23 number of employees on the payroll that represents the expenses incurred by the  
24 Company to perform its necessary functions; rather, one must also consider the  
25 underlying expenses that TAWC paid to offset the unplanned and unscheduled  
26 situations that resulted in vacant positions. Interim vacancies require the Company to  
27 assign overtime to hourly employees, reschedule work activities, delay the work  
28 activity that could be done on a pre-scheduled basis, increase the use of contractors or  
29 agencies, or cause the Company to assign work to other entities or obtain personnel  
30 from another American Water subsidiary. Similarly, by ignoring vacant, but needed,  
31 positions, Mr. Buckner's adjustment does not account for the costs TAWC incurs



1 related to that vacancy, namely, cost for temporary service personnel, meal  
2 allowances, use of contracted services, recruiting expenses, physical exams, and fees  
3 for background checks that are incurred to fill these vacancies. Only in some cases  
4 can the loss of an employee be absorbed on a short-term basis. Stated another way,  
5 the functions of vacant positions must still be performed at a cost and the Company  
6 must expend funds to fill vacancies. As such, Mr. Buckner ignores the realities of  
7 operating a 24/7 customer-oriented utility

8  
9 Finally, Mr. Buckner's recommended level of 104 employees simply does not reflect  
10 actual 2011 employment levels and needs. It also does not consider workforce  
11 turnover and movement – a significant factor affecting employee levels. Further,  
12 there is no evidence that Mr. Buckner performed any analysis of the job functions,  
13 any review of the job duties, or any study that concludes that Tennessee American  
14 can operate effectively and efficiently with an average of 104 employees. Absent  
15 such analysis, Mr. Buckner cannot, and does not, offer any justified explanation why  
16 the company should or could operate properly without these positions. Under Mr.  
17 Buckner's reasoning, the Company's ability to continue to meet customer  
18 expectations and regulatory requirements would be severely compromised.

19  
20 **Q. What is the Company's response to Mr. Buckner's claim that TAWC's**  
21 **recommended employee level is speculative?**

22 A. TAWC's requested employee level is not speculative. The 110 employee level  
23 included in the Company's petition was the result of a tremendous amount of  
24 thought, review, and investigation to determine the number of employees needed to  
25 meet the Company's service mission. The employee level of 110 reflects the number  
26 of employees who are needed and required to meet the service levels during the  
27 attrition year. Each position has particular responsibilities that will play an integral  
28 role in the Company; however, due to the natural occurrence of workforce turnover  
29 and a recently unplanned termination of ten (10) employees, there are a few vacant  
30 positions that brought TAWC's actual headcount down. The Company has been  
31 working diligently to fill these remaining positions. TAWC is not speculating as to

1 its need and the mere fact that every position is not filled does not make the need for  
2 those positions speculative.

3  
4 **Q. Mr. Watson, you mention workforce turnover as playing a significant role in**  
5 **determining employee levels – can you please explain?**

6 A. Workforce turnover is an unavoidable aspect of a business that oftentimes renders  
7 actual workforce numbers, which Mr. Buckner relies on, misleading. Mr. Buckner's  
8 assessment ignores the corporate reality that all necessary positions cannot be filled at  
9 all times – i.e., that staffing a utility is a dynamic process. The fact that the Company  
10 is not always at full strength due to turnover in no way reflects a lack of desire, effort  
11 or need; instead, it is related to events beyond the Company's control. The Company  
12 undertakes great effort to maintain a strong and productive workforce, but TAWC has  
13 experienced about a 98.2% turnover in the workforce during the past 6 years. This  
14 turnover is the result, in large part, of the Company's aging workforce — a trend  
15 occurring across other business sectors as well. This turnover is typically due to  
16 retirements, resignations, and in some cases severance, termination for cause, or death  
17 — events largely beyond the Company's control. In light of these factors, which are  
18 in addition to normal employee turnover from events such as medical leave, military  
19 duty, or personal relocations, it is axiomatic that TAWC cannot always maintain full  
20 employment levels.

21  
22 **Q. What is your response to Mr. Buckner's criticism that TAWC does not achieve**  
23 **its requested employee levels?**

24 A. Contrary to Mr. Buckner's contention, TAWC's employment history supports that  
25 TAWC has the need and intention to achieve the requested employee level. Mr.  
26 Buckner's criticism is also undermined by TAWC's service metric reporting, which  
27 required TAWC to achieve certain levels of performance.

28  
29 Notably, the Company filled the positions that it identified in the 2008 Rate Case as it  
30 had done in previous rate cases. However, given significant personnel turnover, it has  
31 been challenging to replenish the workforce.

1  
2 Mr. Buckner's payroll adjustment should be disregarded because it fails to account  
3 for the fact that payroll expenses will increase to the level requested in this rate  
4 request when TAWC's employment level returns to 110 employee positions. Mr.  
5 Lewis's testimony on behalf of the Union admits that the vacant positions the  
6 Company has been working to replace are necessary and that the filling of these jobs  
7 would alleviate the concern of the Union in this regard.

8  
9 Attached for reference is the current status of personnel that have been hired and have  
10 either reported to work or will begin employment prior to February 28, 2011. (Also  
11 see attached Tennessee American Water Employees (By Department and Job Title)).  
12 Furthermore, a closer examination of TAWC's workforce levels as found in response  
13 to Union's Data Request TN-UWUA-02-Q08 show that the TAWC employee  
14 headcount at January 31, 2011 had reached 97 personnel and is on track to be at the  
15 2010-2011 TAWC employee level of 110 FTEs on or about February 28, 2011.

16  
17 At this time, I wish to report that five (5) additional employees have been hired by the  
18 Company and three (3) additional candidates have accepted offers of employment and  
19 will be hired the week of February 21, 2011 which brings the headcount of employees  
20 to 105. The names, positions and date of hire, as applicable, are as follows:

21  
22 [ BEGIN CONFIDENTIAL INFORMATION ]

23  
24 [ END CONFIDENTIAL INFORMATION ]

25  
26 In this rate case, Mr. Buckner summarily recommended that two union positions be  
27 eliminated and four management positions be eliminated. The vacancies of four of  
28 those positions and additional positions are now being filled, as I explained above in  
29 reference to the hiring of the Project Manager and Field Service Superintendent (these  
30 vacancies were the result of retirements on December 1, 2010 and January 1, 2011,  
31 respectively).

1  
2 Filing vacant positions is a time-consuming and lengthy process that can often result  
3 in gaps in employment levels, which must be addressed through authorizing  
4 employee overtime, deferring work, contracting out work, temporarily assigning  
5 employees from adjacent subsidiaries, or temporarily moving the work to a Service  
6 Company functional area — all of which result in expense to the Company.  
7

8 **Q. Mr. Buckner asserts that the current level of TAWC employees is sufficient to**  
9 **sustain the Company's provision of high quality water service – how do you**  
10 **respond to that?**

11 A. Mr. Buckner ignores the reality of TAWC's corporate and customer growth in terms  
12 of both size and increased expectations. As early as 2004 when I began working for  
13 TAWC, it quickly became apparent to me that TAWC, and particularly the  
14 Company's field operations component, was not adequately staffed to accomplish all  
15 the tasks that are integral to meeting customer expectations. As a result, we  
16 committed to hiring additional personnel in certain areas such as: adding personnel to  
17 read meters, to handle the increasing trend in service order requests, to achieve the  
18 Company's meter replacement and testing program, and to address field service  
19 maintenance requirements. Simultaneously, based on customer satisfaction and  
20 tactical service surveys, we were receiving favorable ratings from our customers.  
21

22 Increased growth and expectations continue into the 2011 attrition year. For example,  
23 we have an increased target of having 918 2-inch water meters tested for accuracy as  
24 part of the meter replacement program. In order to remain on schedule, these water  
25 meters must be either field tested or removed and bench tested for accuracy during  
26 2011. This work is performed exclusively by TAWC hourly employees and will  
27 require approximately 1,800 man-hours, or an increased workload of 65% in 2011  
28 over the work actually accomplished in 2010. We also expect to operate at least  
29 2,067 distribution main line valves in 2011, inspect and operate 4,988 fire hydrants,  
30 and perform additional work on the hydrants including locating, raising, and cleaning  
31 out the valve box to access the associated lateral gate or tapping valve and, as

1 necessary, operating the valve to ascertain its condition. Historically, the valve  
2 inspection on the fire hydrant lateral valve has not been an aspect of the fire hydrant  
3 inspection; however, doing so is important so that the condition of hydrants are tested  
4 and duly recorded in the Company records. This work is expected to require an  
5 additional 1500 man-hours.

6  
7 There has also been a substantial increase in the number of customer service orders  
8 over the last 7 years – from 55,910 in 2003 to 101,363 orders in 2008 – this  
9 represents an 82 % increase. Although the level of orders did decline between 2008  
10 and 2010, the number of customer service orders completed in 2010 was still 69,789,  
11 well above the 2003 level. The Company has instructed the employees who perform  
12 this work to spend additional time with the customer to explain the results of the work  
13 performed, if the customer is home during the appointment, in order to assure that the  
14 customer is satisfied and aware of the work completed. Originally, to address the  
15 increase in service orders, the Company used additional overtime labor but this was  
16 not a viable long-term option as the increased work level has been sustained and the  
17 cost of performing the work on overtime requires paying the employees 1.5 times the  
18 regular hourly rate. The service call times associated with this overtime work were  
19 also not convenient for the customers. Our success in meeting this increased demand  
20 has been achieved through adding additional personnel and establishing baseline  
21 goals for improvement. Indeed, Tennessee American has completed its service call  
22 work on time over 99.2% of the time in the past year.

23  
24 As TAWC's President, I continually evaluate staffing levels and our efficiencies so  
25 that expenses are controlled and we are able to service our customers and meet our  
26 goals and demands. Ultimately, it has become clear that new positions are necessary  
27 to sustain quality of service and meet our goals and demands.

28  
29 To say that periodic vacancies in employee levels means that these positions should  
30 remain vacant simply because the Company has been able to manage in the interim  
31 period ignores the dynamic nature of the business as described above. Ultimately,

1 Mr. Buckner's recommendations would require the Company to perform the same  
2 amount of work, but with fewer employees. The Company absolutely must recover  
3 the expense of the 110 personnel that are necessary to perform the functions that  
4 maintain the high level of quality service our customers have come to expect.

5  
6 The Company has provided updated salary and wage information in response to TN-  
7 UWUA 02-Q008 and TN- UWUA-02-Q0012 to supplement the support for the salary  
8 and wage expenses in its petition.

9  
10 **Q. Please discuss the other two positions included in this rate case that Mr.**  
11 **Buckner addressed in his testimony.**

12 A. One of the positions, Manager of Finance for Tennessee American, was identified in  
13 my direct testimony. Mr. Buckner takes issue with the decision to fill the Manager  
14 of Finance position in 2009 by hiring Mr. Kevin Rogers to replace a supporting  
15 Intermediate Financial Analyst who was an AWWSC employee working remotely  
16 from Charleston, West Virginia that prepared the annual business plan and monthly,  
17 quarterly and annual financial reports and the annual budget. Tennessee American  
18 made the decision to employ Mr. Rogers as the Finance Manager because the  
19 Company required the services of a senior level finance manager with a Tennessee  
20 CPA license, working at TAWC's headquarters, to perform all of the existing  
21 functions formerly performed by the Intermediate Financial Analyst, plus supervise a  
22 staff of three, and manage TAWC's financial transactions to satisfy Sarbanes Oxley  
23 Act obligations.

24  
25 The second position, Governmental Affairs Specialist, held by Kino Becton, is  
26 absolutely necessary to our business, given the amount of regulations that are  
27 imposed on and affect TAWC. New bills related to banking, finance, government  
28 operations, environment and health, commerce, employment, safety, labor and  
29 education all can directly impact our industry by imposing new or varied regulatory  
30 requirements on our operations, so it is necessary for the Company to monitor and  
31 remain apprised of these laws. Second, the Governmental Affairs Specialist works

1 with the local city councils, city employees and local businesses to address any  
2 issues that may arise from their constituents with respect to the services TAWC  
3 provides or regarding any matters related to TAWC's billing service that it provides  
4 for the municipal sewer system. The Governmental Affairs Specialist spends a vast  
5 majority of his time in the local community to ensure continued active  
6 communication between the Company, its customers, and local government. As  
7 such, this position is critical to the Company. The Consumer Advocate has  
8 mischaracterized the majority of the function and duties of the Governmental Affairs  
9 Specialist and does not fully comprehend the importance of this position.

10  
11 **UTILIZATION OF AMERICAN WATER WORKS SERVICE COMPANY**  
12

13 **Q. Please comment on the importance and the advantages of the services and**  
14 **support provided by American Water Work Service Company.**

15 A. The efficiencies and functional support provided to TAWC by utilizing the personnel  
16 and resources of American Water Works Service Company (AWWSC) is described  
17 in great detail in the direct and rebuttal testimony of Mr. Mike Miller, Mr. Pat  
18 Baryenbruch, and in the Schumaker Management Audit ordered by the TRA. The  
19 results of the Management Audit were filed with the TRA in September 2010 just  
20 prior to the filing of the petition for this rate request. Ultimately, the utilization of  
21 AWWSC reduces the costs to TAWC's customers. TAWC can not perform the  
22 services provided by AWWSC on its own as cost-effectively and as adeptly as  
23 AWWSC is able to perform these services. Thus, if TAWC did not utilize AWWSC,  
24 TAWC customers would have to absorb the heightened costs of performing these  
25 services, if TAWC could perform them at all.  
26

27 **Q. Can you please describe an example or two illustrating the benefit and/or value**  
28 **Tennessee American Water receives by utilizing the American Water Works**  
29 **Service Company?**

30 A. For example, TAWC could not afford to hire a Director of Rates and Revenues solely  
31 for TAWC. To do so would require creating a full-time position that the Company

1 does not need since it does not annually file for rate adjustments. Because TAWC is  
2 able to obtain the services of a Director of Rates and Revenues from AWWSC, we  
3 can share the cost of that position with other American Water operating companies, as  
4 well as other functional positions that are dedicated to AWWSC, only when those  
5 services are needed.

6  
7 TAWC also utilizes the services of the AWWSC-operated Central Laboratory located  
8 in Belleville, Illinois, a facility dedicated solely to drinking water analysis and water  
9 quality research for all American Water operating companies. Belleville Central  
10 Laboratory was granted certification under the Safe Drinking Water Act and is  
11 available to Tennessee American at cost to provide technical expertise to analyze and  
12 conduct the most sophisticated of water quality analyses. By allowing the operating  
13 companies to utilize this specialized laboratory, the companies share the expense and  
14 enjoy much lower costs as a result. TAWC also has access to a nationally recognized  
15 microbiologist at the Central Laboratory, Dr. Mark LeChavalier, who we can call  
16 upon as needed to review the extensive water quality database for our operations in  
17 Tennessee and to provide his expertise regarding water quality issues. TAWC could  
18 not otherwise afford to retain such an expert. This same concept can be applied to the  
19 use of personnel in a number of functions including: accounting services, audit  
20 services, financial services, rates and revenue services, communication services,  
21 administrative services, human resources services, legal services, engineering  
22 services, customer service such as the Call Centers, information technology services,  
23 supply chain functions for the procurement of goods and services, and additional  
24 water quality and environmental compliance functions that are all essential to  
25 TAWC's business.

26  
27 Providing these services in-house would cost several million dollars more in  
28 operating expenses annually – a cost much greater than what customers pay now for  
29 TAWC to utilize AWWSC. This would include added costs for hiring additional  
30 employees to fulfill these functions, the lease of additional building space, adding an  
31 information systems department, accounting department, finance department and



1 legal department, and expanding its water quality laboratory and staff. In addition,  
2 TAWC would also incur costs for performing specialized financing work to obtain  
3 the necessary utility grade bonds and loans at the same competitive rates. To perform  
4 the billing functions in-house, the Company would have to purchase or lease a billing  
5 system mainframe computer and bill printing system. For customer service function,  
6 TAWC would need to hire sufficient staff and management to provide around-the-  
7 clock coverage, incurring all the costs associated with hiring these employees and  
8 setting up a call center at TAWC. Ultimately, AWWSC's services are simply much  
9 more cost effective.

10  
11 **Q. The Intervenors have called into question TAWC's service company bills. Can**  
12 **you describe how you review Company bills for service company charges?**

13 A. In this rate case TAWC has provided volumes of data and examples of the reports  
14 summarizing the charges the Company is billed each month. I personally review  
15 these bills, along with my staff, to validate that the charges to TAWC for these  
16 support services are reasonable, accurate, and appropriate. To the extent we have any  
17 questions regarding the hours billed or other charges, I contact the appropriate  
18 employee in the Service Company to discuss and resolve any issues. If there was an  
19 error, I have the charge removed from the applicable TAWC invoice. The review  
20 process has improved in the past 18 months and the analysis of charges is provided in  
21 greater detail, providing greater transparency to charges billed or allocated to the  
22 Company, which in turn gives us the ability to detect any issues easier.

23  
24 **UNACCOUNTED FOR WATER LEVELS**

25  
26 **Q. Please describe what unaccounted for water is and how it is calculated.**

27 A. Unaccounted for water loss is determined by subtracting the amount of water that is  
28 sold to customers (billed water sales less credit adjustments) from the amount of  
29 water treated, pumped, and measured from the water treatment facilities into the  
30 distribution system of the utility (also referred to as system delivery). Certain water  
31 losses that are the result of particular uses are included in the accounting of water

1 used but not billed (non-revenue water) because they are implicitly or explicitly  
2 authorized uses. These include, but are not limited to, water main flushing,  
3 distribution storage tank draining for inspection, repair or painting of the tank  
4 interior/.exterior, city public works street sweeping, sewer flushing, fire department  
5 usage for firefighting, and water meter testing by the water utility.

6  
7 Leakage causes water loss and will require the Company to respond and repair the  
8 leak when the leak occurs in the transmission and distribution mains or service lines  
9 up to the point of the customer's meter, or when the leak comes from utility-owned  
10 fire hydrants. The Company is also obligated, under Tennessee American Water's  
11 Rules, Regulations and Conditions of Service to grant a credit adjustment to  
12 customers who experience an underground leak on their individual service line  
13 between the water meter in the yard at the property line and the point where the  
14 customer's service line enters the home's foundation. This credit adjustment results  
15 in additional non-revenue water.

16  
17 The total percentage of unaccounted for water is obtained by dividing the  
18 unaccounted for water volume by the water delivered to the Company's distribution  
19 system from its water treatment facilities. This amount is then reduced by the amount  
20 of losses that are the result of one of the authorized uses described above and also any  
21 measurable losses that occur beyond the water treatment process.

22  
23 **Q. Have you examined the unaccounted for water levels that occur for other water**  
24 **utilities in Tennessee and in the areas surrounding the Service Area? If so,**  
25 **please describe your findings.**

26 A. Yes I have reviewed the unaccounted for water levels of other water utilities, to the  
27 extent that they are reported, The following table represents other water utilities  
28 reported unaccounted for water levels that is available. Reporting annual  
29 unaccounted for water percentages was not required during the 2008 rate case, but  
30 subsequently the Tennessee Legislature imposed an obligation to report this data.  
31 The data indicate that, more often than not, large systems like Nashville and

Knoxville Utility Board, among others, are operating above the percentage of unaccounted for water that the TRA established in the 2008 rate case.

**Unaccounted For Water  
Tennessee and Georgia Water Systems Comparison**

Sale Creek Utility District	June 30, 2008	37.25%
Johnson City	June 30, 2010	32.94%
Knoxville Utilities Board	June 30, 2009	30.43%
Knoxville Utilities Board	June 30, 2010	32.48%
Soddy Daisy Falling Water Utility District	August 31, 2008	28.92%
Murfreesboro	June 30, 2009	26.00%
Murfreesboro	June 30, 2010	28.10%
Atlanta Watershed	December 31, 2007	26.00%
Nashville	September 23, 2007	24.90%
Savannah Valley Utility District	April 30, 2008	23.32%
<b>Tennessee American Water Company</b>	<b>March 31, 2010</b>	<b>22.93%</b>
Walden's Ridge Utility District	August 31, 2008	20.74%
Union Fork-Bakewell Utility District	June 30, 2008	19.09%
Eastside Utility District	October 31, 2008	18.30%
Hixson Utility District	April 30, 2008	16.48%
Griffith Creek Utility District	December 31, 2008	13.66%

**Source: Annual Audit Report of Utility District or Municipal System to TN Comptroller**

**Q. Is TAWC undertaking any efforts to manage unaccounted for water?**

A. TAWC has an extensive “non-revenue water program” and has made significant efforts to minimize and reduce unaccounted for water for a number of years. TAWC has reinforced the importance of this effort by establishing a “non-revenue water committee,” which has been lead by TAWC Non-Revenue Water Supervisor Ron Schleifer. The NRW Committee includes a total of eleven employees from every department, including myself. The Committee meets monthly to discuss the progress of our efforts across the business to reduce unaccounted for water. The Committee has developed a plan of action strategy and has worked to compile data and information on our real and apparent water losses. Additionally, every employee of Tennessee American Water is responsible to assist in reducing unaccounted for water in the execution of their duties by reporting and repairing leaks, inspecting facilities and customer’s premises for unauthorized use, and assuring that meter reading and

1 billing of customers is completed accurately and timely. Finally, there are two full-  
2 time employees in the Distribution Department responsible for leak detection.

3  
4 The Company has also made significant capital investments in electronic leak  
5 detection and survey equipment to check for leaks in the distribution system. TAWC  
6 has also purchased and installed over 1400 “permalog” electronic surveying devices  
7 at a cost of nearly \$400,000, which are strategically placed at valve locations  
8 throughout the distribution system to detect low-level vibration and sound, which  
9 indicates that a leak is beginning in a section of pipe near the permalog device. The  
10 permalog devices currently provide coverage for about 80% of the distribution  
11 system and the leak detection crew surveys them monthly by mobile survey. The  
12 leak detection crew conducts manual surveys of the remainder of the system by  
13 walking the pipe route to patrol for leaks. Meter readers and field service personnel  
14 also are able to detect leaks as they perform service orders and/or meter readings  
15 daily. When distribution department repair crews service pipes, valves and fire  
16 hydrants, they also check for leakage in the immediate area.

17  
18 TAWC has made several other capital investments to reduce unaccounted for water,  
19 such as the replacement of customer water meters on a periodic scheduled basis. A  
20 small diameter water replacement program was also begun, which replaces on  
21 average about five (5) miles of 2-inch and 2-1/2 inch water main per year in the  
22 distribution system. Capital investment in small diameter mains is necessary and  
23 ongoing and will remain a prudent capital investment going forward, as these pipes  
24 have higher maintenance requirements. In addition, TAWC continues to vigilantly  
25 maintain its pipelines serving high altitude areas, which are prone to leaks due to  
26 increased operating pressure. Having stated that the Company has committed to the  
27 replacement of distribution system components, the Company requests that the TRA  
28 allow the Company to retain the production costs that are greater than the 15% limit  
29 established by the TRA in the 2008 Case and grant TAWC the opportunity to  
30 determine the capital investment required to implement the proposed projects  
31 identified in its 2007 Non-Revenue Water Study (filed with my direct pre-filed

1 testimony). Once the estimates are obtained, TAWC would report back to the TRA  
2 with its findings. The Company also requests that the TRA, based upon the costs  
3 identified for these projects, agree to allow TAWC to recover in future rate base, the  
4 actual investments of such capital investment or operating costs in TAWC rates in its  
5 next rate filing. The Company seeks assurance from the TRA that it will support the  
6 Company as the Company works to continue with its unaccounted for water  
7 initiative, in order to effectively and proactively address this issue and reduce the  
8 water losses toward the 15% level established by the TRA.

9  
10 TAWC has conducted water audits of its systems, resulting in a “Water Balance  
11 Report”, which is used by management to monitor water. From this report, TAWC  
12 can categorize the water accounted for in accordance with the International Water  
13 Association Guidelines. TAWC has calculated a detailed performance indicator for  
14 operational management of real water losses to determine the infrastructure leakage  
15 index, or ILI, which is the ratio of annual real losses to the unavoidable annual real  
16 losses (UARL). The basis for using the UARL is to make allowance for length of  
17 mains, number of service connections, location of customer meters, and average  
18 operating pressure. The ILI measures how effectively the three infrastructure  
19 activities (speed and quality of repairs, active leakage control and pipe materials) are  
20 being managed at the current operating pressure. Values close to 1.0 represent near-  
21 perfect technical management of real losses from infrastructure, at actual operating  
22 pressures. TAWC has achieved an ILI of 2.46 for the Year 2009 (the last year  
23 TAWC’s ILI index was calculated) which is an excellent result. The Company  
24 would point out that the AWWA and the IWA methodology is gaining recognition in  
25 other state regulatory commissions, is currently being considered by water utilities  
26 across Tennessee and the nation, and is a thorough analytical approach for  
27 determining the efficiency of water losses in water distribution systems.

28  
29 To set its annual unaccounted for water loss goals, TAWC relies on American Water  
30 procedures, practices and strategies, the AWWA standards and recommendations for  
31 water systems, the use of the International Water Association’s publication “Losses

1 in Water Distribution Networks,” along with the knowledge and experience of our  
2 personnel and national experts to audit, monitor and achieve our aggressive goal of a  
3 15% unaccounted for water ratio. TAWC has routinely calculated its water loss on a  
4 monthly and annual basis for at least thirty years.

5  
6 Due to the complexity of TAWC’s water system, the variation in operating pressures  
7 of its distributions system, the distribution of customers served, and the distribution  
8 system’s age (142 years old), TAWC’s water system is far more complex than many  
9 water systems of comparable size in the United States. The Company seeks to  
10 achieve water loss reductions in unaccounted for water and, as stated above and in  
11 direct testimony, has a plan which provides a road map for a reduction of  
12 unaccounted for water.. TAWC is committed to continuing to make capital  
13 investments to reduce unaccounted for water going forward and depends upon the  
14 adequate return on investments to attract the debt and equity to finance these capital  
15 improvements.

16  
17 **CALCULATING EXPENSE – OPERATING COSTS**  
18

19 **Q. Please describe how increased operating expenses have contributed to TAWC’s**  
20 **need to request a rate increase.**

21 A. Operating expenses are increasing in a number of categories due to the continued  
22 escalation of the price of goods and services that TAWC requires to perform its  
23 public service obligation. Since the TAWC 2008 rate order, prices have increased for  
24 electricity, sewer service, gasoline, diesel fuel, asphalt pavement materials, ductile  
25 iron pipe, postage, gravel and other backfill materials, concrete, steel, laboratory  
26 supplies, granular activated carbon, and freight costs, just to name a few. Mr.  
27 Buckner’s testimony fails to mention other Company operating costs that have  
28 increased such as street opening permits, the new flowable fill ordinance enacted for  
29 street paving requirements, stormwater fees and city property taxes, all of which were  
30 decisions of local government which have occurred after the 2008 rate case decision.

1 Electric rates in Chattanooga increased by 20% in October 2008, the TVA's fuel cost  
2 adjustment has overall been at least 20% above expense level, the cost of gasoline  
3 and diesel fuel has been increasing and has already reached over \$3.29 per gallon in  
4 the local area, the cost of asphalt paving has gone up 6%, and sewer rates have  
5 increased at a rate of 5.75% per year (approximately 14% increase in the aggregated  
6 period), all of which are far greater than what Mr. Buckner has set forth. In the case  
7 of the cost of water treatment chemicals chlorine has increased by 15.9% from the  
8 2010 unit price, fluoride increased by 7% from the 2010 unit price, corrosion  
9 inhibitor (zinc orthophosphate) has increased 41.3% from the 2010 unit price, and the  
10 most significant chemical we use, polyaluminum chloride, increased by 3.7% above  
11 the 2010 price. As a general matter, almost anything that is related to the  
12 petrochemical industry is rising dramatically faster than inflation (i.e., the cost of  
13 products that contain steel in them, such as ductile iron pipe, has increased by 36% in  
14 the past year).

15  
16 TAWC witness Sheila Miller provided further detail in her rebuttal testimony on the  
17 adjustments to the accounting exhibits due to operating costs and revenue. The  
18 Company faces the prospect that there will be further increases in the costs of goods  
19 and services after its testimony and exhibits are filed in this case.

20  
21 The Intervenors simply disregard the fact that the prices of necessary goods and  
22 services have increased, which is the economic reality within which TAWC must  
23 operate while simultaneously having to maintain the high level of service that is  
24 expected of it.

25  
26 **Q. Mr. Buckner claims that TAWC's rate request "has requested over \$8.977**  
27 **million more in customer rates than the company actually needs to meet their**  
28 **expenses and provide a fair return to their shareholders while providing quality**  
29 **water services to TAWC customers."(Buckner at 3:19-22) Is this an accurate**  
30 **statement?**

1 A. No. In making this statement Mr. Buckner has not claimed that TAWC does not  
2 actually incur these expenses. Yet, somehow Mr. Buckner and the CAPD argue that  
3 the Company should not be allowed to recover these expenses in its revenue  
4 requirement. One example of this error in logic is the CAPD's position that TAWC's  
5 operation and maintenance expenses are the "same" as Ohio American Water, yet,  
6 Ohio American customers are paying an average monthly residential bill of \$49.89  
7 and TAWC residential Chattanooga customers are paying less than \$17.00 a month  
8 on average.

9  
10 His conclusion ignores the indisputable reality that operating costs have increased and  
11 at the same time the water consumption of our customers in general has declined in  
12 terms of overall billing determinates since the TAWC 2008 rate order. This is  
13 consistent with a historical decline in water consumption, as detailed by Dr.  
14 Spitznagel in his direct and rebuttal testimony. Even the CAPD 's own witness John  
15 Hughes recognizes the drop in water use of the Catoosa Utility District Authority that  
16 began shortly after the conclusion of the 2008 rate case hearings. (Hughes at 11:20 –  
17 12:11). TAWC also lost R.L. Stowe, a manufacturing concern, when it permanently  
18 closed in March 2009. At the same time, operating expenses such as fuel and power  
19 have increased for nearly 30 months. It is unreasonable for Mr. Buckner to claim that  
20 the Company's rate request does not reflect the economic environment when  
21 everyone, not just TAWC, has been affected by the increased costs of goods and  
22 services and when water consumption has decreased.

23  
24 The combination of increased operating expenses and reductions in water  
25 consumption has caused TAWC to be unable to earn a fair rate of return, which is  
26 why it must now seek a revenue increase.

27  
28 **Q. What is TAWC's response to Mr. Buckner's accusation that "TAWC is unable**  
29 **to operate within their budgets?"**

30 A. Mr. Buckner's statement is incorrect. The decision to request a rate increase is not  
31 even remotely caused by the Company's inability to operate within its budget. As



1 noted above, the cost increases being experienced in the water utility industry and  
2 nationwide are real and measurable. More importantly, many of those costs are set by  
3 external factors beyond TAWC's control. As the President of TAWC, I have a  
4 fiduciary obligation on behalf of customers and stockholders to file a rate increase  
5 when the earnings are substandard and the assets and capitalization are not aligned –  
6 such is the current reality.

7  
8 If Mr. Buckner's statement were true, then practically no utilities operate within their  
9 budget because rate increases are occurring throughout the country due to increased  
10 operating costs. TAWC and other water utilities face significant, and in some cases,  
11 overwhelming challenges related to deferred infrastructure replacement and upgrades  
12 and due to increased water quality requirements, by way of example. These  
13 challenges, when combined with the increased costs of goods and services needed to  
14 meet the challenges, result in the need for a rate increase.

#### 15 16 **RATE DESIGN AND RATE COMPARISONS**

##### 17 18 **Q. What are the relevant issues that should be reviewed prior to making judgments** 19 **about TAWC's request for a rate increase?**

20 A. It is appropriate to consider the retail price for water in the market place, as it is a  
21 commodity like any other commodity whose price, value and cost can fluctuate.  
22 Attached to my rebuttal testimony are reports and data on the residential water bills of  
23 neighboring water utilities. These reports and data demonstrate that TAWC's cost of  
24 water is well within the price range of the market and is relatively lower than the  
25 average monthly water bill of other water providers.

26  
27 The attached data show that TAWC's rates are relatively lower than the average  
28 monthly water bill of neighboring water providers and are comparable looking at the  
29 largest five cities in Tennessee. Using an average of 4,153 gallons per month, a  
30 TAWC customers' bill would be \$16.62. Other Tennessee utilities' water bills for the  
31 same average usage are as follows: Johnson City – \$16.71; Knoxville – \$17.62 inside

1 the city and \$21.02 outside the city (rates effective January 2010); Murfreesboro, TN –  
2 \$19.28 (rate increase effective July 1, 2009); Memphis – \$13.44 inside the city and  
3 \$19.96 outside the city; Nashville – \$10.38 (for rates effective May 2011). Metro  
4 Atlanta customer bills would be \$24.86 inside the city and \$29.94 outside the city  
5 based on rates set July 1, 2010 but which will be increased by an additional 12% on  
6 July 1, 2011.

7  
8 The most recent Allen and Hoshall Water Rate Study, published in June 2010, is also  
9 provided. It provides context for the relative price of water service in the State of  
10 Tennessee based upon a 5,000 gallon water usage bill. The Allen and Hoshall Water  
11 and Sewer study (a) provides a general idea of the water utility bill amounts for each  
12 of the surveyed entities at the 5,000 gallon quantity and (b) sets forth the water utility  
13 billing amount based upon a hypothetical quantity of water service for a pre-  
14 determined meter size upon which the utility can calculate a sample bill for water  
15 service. The study demonstrates that TAWC was below average in terms of monthly  
16 water bills relative to other water utilities across the state (TAWC's monthly bill for  
17 5,000 gallons is \$21.19 under current rates imposed in the 2008 case). As can be seen  
18 from the list, 70% of the utilities in the Study have a higher monthly water bill  
19 compared to TAWC's \$21.19 bill amount. If TAWC's proposed rate increase  
20 requested in its petition were adopted in full it would only increase the bill amount to  
21 \$25.96 placing it almost exactly at the 50% mark. Accordingly, under its proposed  
22 rate increase TAWC would still be providing water to its customers at rates that are in  
23 line with rates across Tennessee. Of course, other Tennessee utilities have likewise  
24 sought rate adjustments so as their bills increase TAWC will maintain or improve its  
25 position relative to other utilities.

26  
27 Ultimately, what this means is that TAWC has been providing water to its customers  
28 at very affordable rates compared to other utilities, despite the fact that TAWC's  
29 unique distribution system demands are greater than most other utilities due to  
30 Chattanooga's topography and despite the fact that our operating costs have  
31 continued to rise.

1  
2 **Q. What additional differences between TAWC and other utility providers makes**  
3 **TAWC's request for a rate increase reasonable?**

4 A. Unlike many comparable utilities in Tennessee, TAWC does not get additional  
5 revenue from charging its customers fees and other charges. Moreover, TAWC has  
6 unique operating costs compared to some of these comparable utilities. Thus, a  
7 comparison based on rates alone is wholly inappropriate because it does not account  
8 for the fees and charges adding to revenues for some other utility providers. For  
9 example, Metro/Nashville Water Service, Knoxville Utility Board, and Memphis  
10 Light Gas and Water charge tap fees when, for example, builders wish to connect new  
11 construction to the water lines. Lenoir City Water Board charges an infrastructure  
12 surcharge. Each of these water utilities also charge plan review fees, fees for flow  
13 testing of hydrants, inspection fees, and even fees for providing the customer a copy  
14 of their lost bill. In comparison, TAWC does not charge these fees, saving our  
15 customers money. These savings can be substantial. For example, Utility Districts in  
16 Hamilton County charge between a \$325 to \$3,500 tap fee per residential connection.

17  
18 Additionally, TAWC pays property taxes and income taxes that the other six  
19 municipal systems do not have to pay. Memphis Gas Light and Water's treatment  
20 costs are much lower since it has a groundwater source, which is much less expensive  
21 than the costs TAWC incurs for purifying water. Further, TAWC operates in a  
22 geographical location that requires increased operating expenses for fuel and power to  
23 pump water to extremely high elevations. TAWC's maintenance expenses are also  
24 uniquely high due to the extreme pressure of pumping water to high elevations,  
25 coupled with the age of the infrastructure.

26  
27 Accordingly, it becomes evident after comparing TAWC to these other utilities that  
28 the intervenors' vehement criticisms of TAWC's requested rate increase are  
29 unfounded. TAWC is providing affordable water to its customers (under current and  
30 proposed rates) at a cost that is at, or below, the average cost of water for other  
31 Tennessee and nearby utilities. TAWC is also not charging many of the fees to its

1 customers that its counterparts charge. This saves our customers money but also  
2 means fewer revenues for the Company. On top of all this, TAWC faces many  
3 unique operating expenses, as detailed above. The ultimate result is that TAWC is  
4 not operating with a reasonable rate of return. This is exactly why TAWC has filed  
5 its petition for a rate increase in this case and also this is why the Authority should  
6 reject the intervenors' repeated attempts to attack the justifications for TAWC's  
7 decision to seek a rate increase.

8  
9 **VALVE MAINTENANCE AND OTHER OPERATIONAL PROGRAMS**

10  
11 **Q. The Union has raised issues with American Water's practice of conducting a**  
12 **valve exercising, maintenance and inspection program. Please discuss the**  
13 **Company's valve program and practices.**

14 A. The company has had an ongoing valve inspection program in Tennessee for many  
15 years. The company has placed only the distribution system line valves in the routine  
16 inspection program, although there are numerous and varying types of valving. In  
17 2008, the Company invested in a new vehicle that was designed and equipped to  
18 provide a comprehensive approach to valve exercising and inspection, in addition to  
19 the other vehicles and equipment that Tennessee American currently had in its fleet.  
20 TAWC trained its employees on the use and operation of this equipment. As part of  
21 the inspection program, the Company maintains an extensive paper records system  
22 that contains distribution system valves information, the related construction records,  
23 and the valve inspection records, similar to how it maintains a fire hydrant database  
24 and inspection records.

25  
26 **Q. The Union, in Mr. Jim Lewis' direct testimony, has expressed concerns regarding**  
27 **the staffing level of the full-time employees with respect to the valve operation**  
28 **and maintenance program. Please explain what is meant when the company**  
29 **indicates that current staffing levels are inadequate to perform long-term valve**  
30 **operation and maintenance.**

1 A. The Company believes it properly and adequately staffed its departments with regard  
2 to the valve operation and maintenance program, despite Mr. Haddock's suggestions  
3 to the contrary. Mr. Haddock was just one crew member in the maintenance group of  
4 the Field Services Department and was one, of many, involved in the Company's  
5 valve operation and maintenance activities. Indeed, Mr. Haddock's duties were  
6 largely limited to preventative measures and there were also additional valves not  
7 under his purview.

8  
9 Although the Company has been able to effectively maintain its valves, the Company  
10 cannot continue to perform valve operation and maintenance in the long-term without  
11 the additional staff requested in its petition, as discussed previously in my testimony,  
12 the Union does not contest this fact.

13  
14 **Q. Mr. Lewis, through Mr. Haddock's statement, contends that the Company is no**  
15 **longer performing preventative valve maintenance. Is the Company continuing**  
16 **with the Preventative Valve Maintenance Program?**

17 A. Yes, it is. During 2009, the Company set goals to inspect/operate 151 valves equal to  
18 or greater than 16-inches and 5,064 valves less than 16-inches. The Company was  
19 able to inspect/operate 187 valves 16-inches or greater and 5,898 valves less than 16-  
20 inches. During 2010, the Company's goal was to inspect/operate 152 valves greater  
21 than 16-inches and 2,400 valves 16-inches or less. The Company was able to  
22 inspect/operate 157 16-inch valves and 2,067 valves 16-inches or less. In 2009 and  
23 2010, the Company focused on valve repair and maintenance due to employee work  
24 force mix and economic conditions. The Company met its valve inspection/operation  
25 goals except for the smaller valves in 2010, which was very close to being met.  
26 However, Mr. Haddock's retirement along with other changes did not permit the  
27 completion of that work in the last couple of months of 2010. The credit crisis and  
28 weak economy led to constructions of fewer new housing units in our service area, so  
29 employees who normally engaged in new service installations were reassigned to  
30 maintenance work. This also was a significant part of the reason that the capitalized  
31 payroll percentage declined in 2009 and 2010 because new service installations are

1 capitalized and because valve inspection, maintenance and repair are operational and  
2 maintenance labor. The capitalized labor adjustment is further explained by  
3 Company witness Sheila Miller in her rebuttal testimony. Construction activities for  
4 new construction had not yet returned to normal levels experienced in 2007 and early  
5 2008, therefore Company personnel have been able to spend more hours working on  
6 preventative valve maintenance. Given the recent replenishment of the hourly  
7 employees in that department, I expect that our employees will meet the established  
8 valve maintenance goals by the end of 2011.

9

10 **Q. Does this conclude your testimony?**

11 A. Yes, it does.

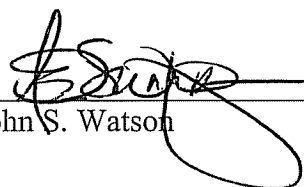
TENNESSEE REGULATORY AUTHORITY

STATE OF TENNESSEE

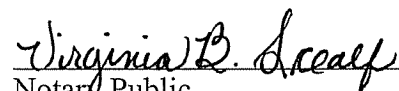
COUNTY OF HAMILTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared John S. Watson, being by me first duly sworn deposed and said that:

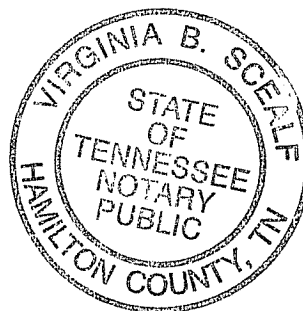
He is appearing as a witness on behalf of Tennessee-American Water Company before the Tennessee Regulatory Authority, and if present before the Authority and duly sworn, his rebuttal testimony would set forth in the annexed transcript consisting of 29 pages.

  
John S. Watson

Sworn to and subscribed before me  
this 3<sup>rd</sup> day of February 2011.

  
Notary Public

My commission expires August 25, 2012.



2/7/2011 11:50 AM

## TENNESSEE AMERICAN WATER EMPLOYEES

### By Department and Job Title

#### **Administrative**

John Watson	President
Kevin Rogers	Manager - Finance
Doug Brock	Acting Superintendent - Field Operations
Sally Thornton	Senior HR Generalist
Pamela Cummings	Supervisor - Field Operations
Kimberly Dalton	Manager - External Affairs
Ginny Scealf	Executive Assistant
B. Stacie Buchanan	Executive Secretary
Kevin Highsmith	Sr Specialist - ORM
Brian Markham	Specialist - Operations
Kino Becton	Specialist Government Affairs

#### **Field Operations**

##### ***Supervisors/Specialists***

Rachel Bartley	Supervisor - Field Operations
Phyllis Lovelace	Supervisor - Field Operations
Bryan Mitchell	Supervisor - Field Operations
Leah Morrison	Supervisor - Field Operations
Ron Schleifer	Supervisor - Field Operations
Vacancy	Supervisor - Field Operations
David McBay	Specialist - Maint Services
Mark Turley	Specialist - Operations

##### ***Heavy Equipment Operator***

Tad Autry	Heavy Equipment Operator
Rich Bednarski	Heavy Equipment Operator
Brian Billups	Heavy Equipment Operator
Scott Crane	Heavy Equipment Operator
Jack Derryberry	Heavy Equipment Operator
Renee Grace	Heavy Equipment Operator
Joe Green	Heavy Equipment Operator
Lamar Jenkins	Heavy Equipment Operator
Billy Welch	Heavy Equipment Operator

##### ***Distribution Clerk***

Linda Russell	Distribution Clerk
Jane Hughes	Distribution Clerk

##### ***Truck Driver Utility Worker***

William Blevins	Truck Driver Utility Worker
Tony Borders	Truck Driver Utility Worker
John Denton	Truck Driver Utility Worker
Stephen Goins	Truck Driver Utility Worker
Ramon Grant	Truck Driver Utility Worker
Erich Haws	Truck Driver Utility Worker
Chris Hays	Truck Driver Utility Worker
Roy Hindman	Truck Driver Utility Worker
Elijah King	Truck Driver Utility Worker
Chase Layne	Truck Driver Utility Worker
B. Shawn McGhee	Truck Driver Utility Worker
Vance Pituch	Truck Driver Utility Worker
Danny Seebeck	Truck Driver Utility Worker
William Taylor Simms	Truck Driver Utility Worker



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Monique Spear	Truck Driver Utility Worker
Jeff Stanley	Truck Driver Utility Worker
Rick Stephens	Truck Driver Utility Worker
George David Stuart	Truck Driver Utility Worker
Dustin Lance Talley	Truck Driver Utility Worker
Nathan Talley	Truck Driver Utility Worker
Morris Taylor	Truck Driver Utility Worker
Keith Wilson	Truck Driver Utility Worker
Vacancy	Utility Worker - Bid as TDUW

***Meter Reader***

Denise Hays	Meter Reader
Brenda Melton	Meter Reader

***Field Representative***

Kelly Atkins	Field Services Representative
Randolph Beck	Field Services Representative
Tim Blevins	Field Services Representative
John Boyer	Field Services Representative
Amber Clark	Field Services Representative
Joseph Fino	Field Services Representative
Michael Griffith	Field Services Representative
Herbert Hester (Chase)	Field Services Representative
Andrew Hixson	Field Services Representative
Courtney Johnson	Field Services Representative
Edward Johnson	Field Services Representative
Jeffrey Jones	Field Services Representative
Will O'Donnell	Field Services Representative
Korey Owens	Field Services Representative
Jonathon Raines	Field Services Representative
Maurice Ragland	Field Services Representative
Shannon Shackelford	Field Services Representative
Jeff Stafford	Field Services Representative
Derick Williams	Field Services Representative

***Meter Repair***

Stacy Knight	Meter Repair
Rick Skiles	Meter Repair

***Field Services***

Glenn Eady	Field Service Person
Greg Robinson	Field Service Person

***Clerical***

Myra Kelley	Field Service Records Specialist
Donette Satterfield	Field Service Records Specialist

**Engineering**

***Management***

Kate Nartey	Engineer
Vacancy	Engineering Project Manager

***Draftsperson***

Robbie Harvey	CAD Drafter
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***Clerical***

Cindy Steed	Engineering Clerk
Faye Williams	Engineering Clerk

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Vacancy

Engineering Clerk

**Production**

**Management**

Mark Zinnanti	Superintendent - Production
Neil Bratcher	Supervisor - Production
Stan Moorhouse	Supervisor - Production

**Process Technician**

Debbie Camp	Process Technician
Arthur Scruggs	Process Technician
Ben Pitman	Process Technician
Charlotte Hutsell	Process Technician

**Laborer/Relief Process Tech in Training**

Matthew McCrary	Laborer/Relief Proc Tech Apprentice
Jason Campbell	Laborer/Relief Proc Tech Apprentice

**Laborer/Relief Process Technician**

James Beets	Laborer/Relief Process Tech-1st
Eric Sowell	Laborer/Relief Process Tech-2nd

**Master Maintenance Mechanic**

Adam Chrnalogar	Master Maintenance Mechanic
Melvin Walker	Master Maintenance Mechanic
Dale Burrell	Master Maintenance Mechanic
Jason Ha	Master Maintenance Mechanic
Ken Hughes	Master Maintenance Mechanic
Matthew Justice	Master Maintenance Mechanic
Vacancy	Master Maintenance Mechanic

**Lab Worker**

Barbara Upshaw	Laboratory Worker
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**Production Clerk**

Dianna Vaughn	Production Clerk
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**Service Delivery/Environmental**

**Management**

Kitty Banks	Sr Specialist - Cross Connection
Steve Betty	Sr Specialist - Cross Connection
Kim Durham	Chemist II
Susan Holmes	Supervisor/WQ Envrn Compliance
Adrien Partridge	Chemist II

**Tennessee - American Water Company**  
**Comparison of Average Usage to Peer Water Utilities**  
**Based on average usage 5.537CCF or 4.153 (1,000 gallons)**

Tennessee American  
 Average Consumption TN 4153 Gallons  
 Average Consumption TN 5.5370 CCF

**Metro Water-Nashville**

**Effective 5/1/10**

Meter Charge 0.0000  
 2.98 per 200 (CCF) 5.9600  
 2.22 per 200 (CCF) over 200 3.9261  
 Total Bill 9.8861  
**Scheduled for 5% increases per year 2010-12**

**Effective 5/1/11**

Meter Charge 0.0000  
 3.13 per 200 (CCF) 6.2600  
 2.33 per 200 (CCF) over 200 4.1206  
 Total Bill 10.3806

**Memphis - MGLW**  
**Inside City**

**Effective 1/3/11**

Meter Charge 5.8200  
 1.376 per 100 (CCF) 7.6189  
 13.4389  
**This was a 5% rate increase**

**Outside City**

**Effective 1/3/11**

Meter Charge 8.1000  
 2.142 per 100 (CCF) 11.8636  
 19.9636

**Knoxville-Knoxville Utility Board**  
**Inside City**

**Effective 1/1/10**

Meter Charge 8.0000  
 .25 per 200 (CCF) 0.2500  
 2.65 per 100 (CCF) over 200 9.3731  
 17.6231  
**This was 12% increase per KNS**

**Outside City**

**Effective 1/1/10**

Meter Charge 9.4  
 .30 per 200 (CCF) 0.3  
 3.20 per 100 (CCF) over 200 11.3184  
 21.0184

**Murfreesboro**

**Effective 7/1/2009 for 2010 & 2011**

Service Connection Fee 1,200.000 **No current recommended increases**

Meter Charge 8.2200  
 0 - 150 CCF allowance, 2.74 per CCF over 150 11.0614  
 19.2814

**Johnson City**

**Effective 7/1/2010**

Meter Charge 3.9600  
 0 - 20,000 gallons is 3.07 per 1000 12.7497  
 16.7097  
**No information on future increases found**

**Tennessee - American Water Company**  
**Comparison of Average Usage to Peer Water Utilities**  
**Based on average usage 5.537CCF or 4.153 (1,000 gallons)**

TAWC - Watson Rebuttal Exhibit 2 2/3/2011

Tennessee American Page 2 of 2

Average Consumption TN 4153 Gallons  
Average Consumption TN 5.5370 CCF

<b>Atlanta - City</b>		<b>Effective 7/1/2010</b>	
<b>Inside</b>			<b>Expecting 12% rate increases per year through 2012</b>
	Base Charge	5.8600	
	2.30 per 100 (CCF) to 300	6.9000	
	4.77 per 100 (CCF) from 400 to 600	12.1015	
		<u>24.8615</u>	
<b>Outside</b>		<b>Effective 7/1/2010</b>	<b>Expecting 12% rate increases per year through 2012</b>
	Base Charge	5.8600	
	3.13 per 100 (CCF) to 300	9.3900	
	5.79 per 100 (CCF) from 400 to 600	14.6892	
		<u>29.9392</u>	
<b>Inside</b>		<b>Effective 7/1/2011</b>	
	Base Charge	6.5600	
	2.58 per 100 (CCF) to 300	7.7400	
	5.34 per 100 (CCF) from 400 to 600	13.5476	
		<u>27.8476</u>	
<b>Outside</b>		<b>Effective 7/1/2011</b>	
	Base Charge	6.5600	
	3.51 per 100 (CCF) to 300	10.5300	
	6.48 per 100 (CCF) from 400 to 600	16.4398	
		<u>33.5298</u>	
<b>Atlanta - Gwinnett County</b>		<b>Effective 1/1/2011</b>	
	Meter Installation Fee 3/4"	395.0000	No 5/8" meters listed in the schedule
	System Development Fee 3/4"	1128.0000	<b>May 2010 proposed 16% per year increases through 2014, final 2011 increase was 6.5%</b>
	Base Charge	7.5000	<b>Can't find final approved % increase for 2012-14</b>
	0 - 7,999 gallons is 4.38	18.1901	
		<u>25.6901</u>	
<b>Atlanta - Cobb County</b>		<b>Effective 1/1/2011, annual review</b>	
	Meter Charge 5/8"	7.0000	<b>2011 increase was 6%, 8% proposed for 2012</b>
	2.83 for 0-1,000 gallons	2.8300	
	4.11 for 1,001-2,000 gallons	4.1100	
	5.12 for 3,001-4,000 gallons	5.1200	
	6.00 for 4,001-4,999 gallons	0.9180	
		<u>19.9780</u>	
<b>Atlanta - DeKalb County</b>		<b>Effective 1/1/2011</b>	
	Tap Fee	1100.0000	No 5/8" meters listed in the schedule
	Water Access Fee	2000.0000	
	Meter Charge 3/4"	2.0800	<b>Just passed in December an 11% per year rate increase for 2012-14</b>
	1.58 per 1,000 up to 2,000 gallons	3.1600	
	2.25 per 1,000 2,001 to 10,000 gallons	4.8443	
		<u>10.0843</u>	
<b>Tennessee - American</b>		<b>Effective 10/1/2008</b>	
	Tap Fee	0.0000	
	Water Access Fee	0.0000	
	Meter Charge 5/8"	10.8800	
	.2028 per CCF up 4 CCF	0.8112	
	3.207 per CCF for 4-10 CCF	4.9292	
		<u>16.6204</u>	



# TENNESSEE WATER AND SEWER RATE SURVEY



JUNE 2010



## Tennessee Water and Sewer Rate Survey 2010 Document Overview

In May of 2010, Allen & Hoshall mailed form letters to 444 utility organizations throughout the State of Tennessee. The purpose of the mailing was to survey the respective utility entities, soliciting information on water and sewer billing rates. If no response was received from a Utility in 2010, last available data was used and is indicated by an "\*." The monthly water and sewer bill for the three usage volumes was generally calculated using the "inside residential" rate schedule for a  $\frac{3}{4}$ " or smaller meter size.

The Survey is divided into the following twelve sections:

- Section 1 – Tennessee Water Rates – Rank of 5,000 Gallon Water Bill – Sorted Numerically  
Using the compiled Utility rate schedules, a list was generated of the water bills for a monthly residential volume of 5,000 gallons. This list was sorted from the lowest calculated monthly bill to the highest calculated monthly bill.
- Section 2 – Tennessee Water Rates – Rank of 5,000 Gallon Water Bill – Sorted Alphabetically  
This list reports the same information as that in Section 1, but the entries are sorted alphabetically by Utility.
- Section 3 – Tennessee Water Rates – Rank of 15,000 Gallon Water Bill – Sorted Numerically  
Using the compiled Utility rate schedules, a list was generated of the water bills for a monthly residential volume of 15,000 gallons. This list was sorted from the lowest calculated monthly bill to the highest calculated monthly bill.
- Section 4 – Tennessee Water Rates – Rank of 15,000 Gallon Water Bill – Sorted Alphabetically  
This list reports the same information as that in Section 3, but the entries are sorted alphabetically by Utility.
- Section 5 – Tennessee Water Rates – Rank of 25,000 Gallon Water Bill – Sorted Numerically  
Using the compiled Utility rate schedules, a list was generated of the water bills for a monthly residential volume of 25,000 gallons. This list was sorted from the lowest calculated monthly bill to the highest calculated monthly bill.
- Section 6 – Tennessee Water Rates – Rank of 25,000 Gallon Water Bill – Sorted Alphabetically  
This list reports the same information as that in Section 5, but the entries are sorted alphabetically by Utility.
- Section 7 – Tennessee Sewer Rates – Rank of 5,000 Gallon Sewer Bill – Sorted Numerically  
Using the compiled Utility rate schedules, a list was generated of the sewer bills for a monthly residential volume of 5,000 gallons. This list was sorted from the lowest calculated monthly bill to the highest calculated monthly bill.



## Tennessee Water and Sewer Rate Survey 2010 Document Overview

➤ Section 8 – Tennessee Sewer Rates – Rank of 5,000 Gallon Sewer Bill – Sorted Alphabetically

This list reports the same information as that in Section 7, but the entries are sorted alphabetically by Utility.

➤ Section 9 – Tennessee Sewer Rates – Rank of 15,000 Gallon Sewer Bill – Sorted Numerically

Using the compiled Utility rate schedules, a list was generated of the sewer bills for a monthly residential volume of 15,000 gallons. This list was sorted from the lowest calculated monthly bill to the highest calculated monthly bill.

➤ Section 10 – Tennessee Sewer Rates – Rank of 15,000 Gallon Sewer Bill – Sorted Alphabetically

This list reports the same information as that in Section 9, but the entries are sorted alphabetically by Utility.

➤ Section 11 – Tennessee Sewer Rates – Rank of 25,000 Gallon Sewer Bill – Sorted Numerically

Using the compiled Utility rate schedules, a list was generated of the sewer bills for a monthly residential volume of 25,000 gallons. This list was sorted from the lowest calculated monthly bill to the highest calculated monthly bill.

➤ Section 12 – Tennessee Sewer Rates – Rank of 25,000 Gallon Sewer Bill – Sorted Alphabetically

This list reports the same information as that in Section 11, but the entries are sorted alphabetically by Utility.

Allen & Hoshall wishes to thank all the participants in the 2010 Survey and hopes this document is useful and beneficial to your organization's planning and informational referencing.



## **SECTION 1**

### **2010 TENNESSEE WATER RATES**

### **RANK OF 5,000 GALLON WATER BILL, SORTED NUMERICALLY**



**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED NUMERICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
1	Hixson Utility District (Hamilton Co.)	\$ 4.89
2	Duck River Utility Commission	\$ 6.00
3	Germantown, City of *	\$ 6.75
4	Rossville, Town of	\$ 7.39
5	Bartlett, City of *	\$ 7.72
6	Madison Suburban Utility District	\$ 8.50
7	Memphis Light Gas & Water	\$ 8.73
8	Crossville, City of	\$ 9.35
9	Jefferson City	\$ 10.89
10	Greenville Water Commission	\$ 11.14
11	Munford, City of	\$ 11.25
12	Marion Natural Gas *	\$ 11.48
13	Kingsport, City of	\$ 11.49
14	Hendersonville Utility District *	\$ 11.80
15	Greenfield, City of *	\$ 12.00
16	Millington, City of *	\$ 12.00
17	Alamo, City of *	\$ 12.50
18	Collierville, Town of	\$ 13.00
19	Dresden, City of	\$ 13.04
20	Gallaway, City of *	\$ 13.20
21	Metro Water Services - Nashville	\$ 13.41
22	Brownsville Utility Department	\$ 13.96
23	Manchester, City of *	\$ 14.05
24	Erwin Utilities	\$ 14.07
25	Old Hickory Utility District *	\$ 14.15
26	Spring Hill, City of *	\$ 14.34
27	Smyrna Utilities	\$ 14.40
28	Bethel Springs, Town of	\$ 14.50
29	Union City, City of	\$ 14.50
30	Harpeth Valley Utilities District *	\$ 14.65
31	Middleton, City of	\$ 14.70
32	Algood, City of *	\$ 14.88
33	Morristown Utility Systems	\$ 14.90
34	Gatlinburg Utility Department	\$ 15.25
35	Humboldt Utilities	\$ 15.25
36	Covington, City of	\$ 15.32
37	Maryville, City of	\$ 15.51
38	Lexington Water Systems *	\$ 15.71
39	Athens Utilities Board *	\$ 15.75
40	Somerville Water & Gas	\$ 15.84
41	Sharon, City of	\$ 16.11
42	Clinton Utilities Board	\$ 16.22
43	First Utility District of Knox County *	\$ 16.38
44	Camden Water & Sewer	\$ 16.43
45	Loudon Utilities Board *	\$ 16.50
46	Dayton, City of *	\$ 16.53
47	Martin, City of	\$ 16.81
48	Springfield Water & Wastewater Dept. *	\$ 16.86
49	LaVergne, City of	\$ 16.90

TENNESSEE WATER RATES

June 1, 2010

RANK OF 5,000 GALLON WATER BILL - SORTED NUMERICALLY

RANK	UTILITY COMPANY	5,000 GAL BILL FOR
50	Eastside Utility District (Hamilton Co.)	\$ 16.95
51	Savannah, City of	\$ 17.00
52	Centerville, Town of *	\$ 17.03
53	Graysville, City of *	\$ 17.13
54	Paris Board of Public Utilities	\$ 17.33
55	Cookeville, City of	\$ 17.39
56	Estill Springs, Town of	\$ 17.50
57	Smithville, City of	\$ 17.50
58	Cleveland Utilities	\$ 17.76
59	White Pine, Town of *	\$ 17.87
60	Johnson City Water & Sewer	\$ 17.99
61	Columbia Power & Water System	\$ 18.00
62	Lewisburg, City of *	\$ 18.20
63	Leoma Utility District *	\$ 18.25
64	Oneida Water & Wastewater	\$ 18.40
65	McKenzie, City of	\$ 18.48
66	Milan Dept. of Public Utilities	\$ 18.52
67	Grand Junction Water *	\$ 18.53
68	Gallatin Public Utilities	\$ 18.54
69	Bristol, City of	\$ 18.70
70	Tullahoma Utilities Board *	\$ 18.80
71	Knoxville Utilities Board	\$ 18.85
72	Lobelville, City of	\$ 18.92
73	Portland, City of	\$ 18.93
74	Elizabethton, City of	\$ 19.03
75	Sparta Electric & Water System *	\$ 19.10
76	Hampton Utility District	\$ 19.25
77	Mosheim, Town of *	\$ 19.43
78	Elbridge Water Association *	\$ 19.50
79	Jackson Energy Authority	\$ 19.63
80	Russellville-Whitesburg Utility District *	\$ 19.75
81	Kenton, City of *	\$ 19.78
82	Oliver Springs Water Department *	\$ 19.80
83	Englewood Water & Gas *	\$ 19.89
84	McMinnville, City of	\$ 19.95
85	Mount Pleasant, City of	\$ 19.98
86	Toone, Town of	\$ 20.00
87	Lafayette, City of	\$ 20.46
88	Rockwood Water Sewer & Gas	\$ 20.48
89	Madisonville, City of *	\$ 20.55
90	Dowelltown Liberty Water *	\$ 20.88
91	Dyersburg, City of *	\$ 20.98
92	Trenton Light & Water	\$ 21.00
93	Niota Water Department *	\$ 21.01
94	Riceville Utility District	\$ 21.04
95	Etowah Utilities *	\$ 21.32
96	Ripley Gas & Water *	\$ 21.45
97	Shelbyville Power Water & Sewerage *	\$ 21.50
98	Northwest Dyersburg Utility District *	\$ 21.65

-TAWC 2019

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED NUMERICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
99	West Knox Utility District	\$ 21.79
100	Newbern, City of	\$ 21.85
101	Sweetwater Utilities Board	\$ 21.87
102	Signal Mountain, Town of	\$ 21.96
103	Piperton Water System	\$ 21.99
104	Bloomington Utility District *	\$ 22.00
105	First Utility District of Tipton County *	\$ 22.00
106	Obion, Town of *	\$ 22.01
107	Greenbrier, City of *	\$ 22.05
108	Franklin, City of	\$ 22.10
109	Scotts Hill Water Department	\$ 22.15
110	Atoka, Town of	\$ 22.25
111	Pulaski, City of	\$ 22.36
✓ 112	Murfreesboro Water & Sewer	\$ 22.41
113	Jonesborough, Town of *	\$ 22.50
114	Mallory Valley Utility District	\$ 22.50
115	Michie, City of	\$ 22.50
116	Poplar Grove Utility District *	\$ 22.50
117	Hartsville/Trousdale Water	\$ 22.68
118	Adamsville, Town of *	\$ 22.85
119	Byrdstown, Town of	\$ 23.02
120	Fayetteville Public Utilities *	\$ 23.03
121	Gleason, City of *	\$ 23.10
122	Monterey, Town of *	\$ 23.25
123	Mountain City, Town of	\$ 23.30
124	Decherd Water System	\$ 23.32
125	Sevierville, City of *	\$ 23.39
126	Lakewood, City of *	\$ 23.43
127	Aqua Utilities Company, Inc. *	\$ 23.56
128	Luttrell-Blaine-Corryton Utility District *	\$ 23.73
129	Tiptonville, Town of	\$ 24.00
130	Tellico Area Services System	\$ 24.09
131	Norris Water Commission	\$ 24.15
132	Huntland Waterworks	\$ 24.56
133	Halls, Town of *	\$ 24.70
134	Lafollette Utilities	\$ 24.70
135	Winchester Utilities	\$ 24.89
136	Celina, City of *	\$ 25.21
137	Hornsby Water District	\$ 25.25
138	South Elizabethton Utility *	\$ 25.25
139	Perryville Utility District	\$ 25.50
140	Ardmore Water System *	\$ 25.70
141	Lauderdale Co. Water System	\$ 25.75
142	Huntingdon, Town of	\$ 26.01
143	Old Gainesboro Road Utility District *	\$ 26.10
144	Tennessee Ridge, City of *	\$ 26.16
145	Northeast Knox Utility District	\$ 26.40
146	Lebanon, City of *	\$ 26.77
147	Jellico Water System	\$ 26.80

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED NUMERICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
148	South Fulton, City of *	\$ 26.80
149	Moscow Water Department	\$ 27.00
150	Rogersville Water Department	\$ 27.01
151	Bangham Utility Water District	\$ 27.05
152	Soddy Daisy Falling Water UD	\$ 27.24
153	Friendship, City of	\$ 27.50
154	Nolensville/College Grove UD *	\$ 27.58
155	Lenoir City Utilities Board	\$ 27.70
156	Alcoa, City of	\$ 27.75
157	Bell Buckle, Town of *	\$ 28.06
158	Ocoee Utility District	\$ 28.25
159	Dunlap, City of	\$ 28.30
160	South Blount Utility District *	\$ 28.49
161	E. Montgomery Utility District *	\$ 28.50
162	Savannah Valley Utility District *	\$ 28.50
163	Surgoinsville Utility District *	\$ 28.50
164	Alpha-Talbott Utility District	\$ 28.60
165	Waynesboro, City of	\$ 28.78
166	Chapel Hill, Town of *	\$ 29.30
167	New Johnsonville, City of	\$ 29.34
168	Waverly Water System *	\$ 29.43
169	Big Sandy Waterworks *	\$ 29.48
170	Blountville Utility District	\$ 29.54
171	Dandridge Water Department	\$ 29.66
172	Henning, Town of	\$ 29.71
173	Claiborne Utilities District	\$ 29.79
174	Friendsville City Water Works *	\$ 29.85
175	Center Grove-Winchester Springs UD	\$ 29.95
176	Gibson Co. Municipal Water District *	\$ 29.98
177	County-Wide Utility Dist. Of Crockett Co.	\$ 30.00
178	DeKalb Utility District #1 *	\$ 30.00
179	Summertown Utility District	\$ 30.00
180	Kingston, City of *	\$ 30.07
181	Big Creek Utility District	\$ 30.13
182	Warren County Utility District *	\$ 30.83
183	Collinwood, City of *	\$ 30.94
184	Dover, Town of	\$ 31.10
185	Maury City, Town of	\$ 31.25
186	Pigeon Forge Utility	\$ 31.27
187	Spring City, Town of *	\$ 31.30
188	First Utility District of Hawkins County	\$ 31.41
189	Bolivar, City of *	\$ 31.42
190	Crab Orchard Utility District	\$ 31.45
191	Woodbury Water & Sewer Department	\$ 31.45
192	Walden's Ridge Utility District *	\$ 31.52
193	Ashland City Water & Sewer *	\$ 31.70
194	Northeast Henry Co Utility District	\$ 31.70
195	Bradford, Town of *	\$ 31.93
196	Cons. Utility District of Rutherford Co. *	\$ 31.95

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED NUMERICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
197	Pikeville, City of	\$ 32.13
198	South Paris Water Co-Operative *	\$ 32.17
199	Chuckey Utility District	\$ 32.63
200	Grandview Utility District	\$ 32.70
201	Rutledge, Town of	\$ 32.99
202	South Side Utility District #1 *	\$ 33.00
203	Vanleer, Town of *	\$ 33.00
204	Knox Chapman Utility District	\$ 33.27
205	Cedar Grove Utility District *	\$ 33.50
206	Shady Grove Utility District	\$ 33.50
207	Lynnville, Town of *	\$ 33.58
208	North Utility District (Rhea County) *	\$ 33.75
209	Bedford Co. Utility District	\$ 34.13
210	Glen Hills Utility District *	\$ 34.41
211	Cross Anchor Utility District	\$ 34.61
212	Lawrenceburg Utility Systems	\$ 34.68
213	White House Utility District	\$ 35.15
214	Huntsville Utility District *	\$ 35.48
215	Dickson County Water Authority	\$ 35.60
216	Fentress County Utility District	\$ 35.83
217	Arthur-Shewanee Utility District *	\$ 35.99
218	Cumberland Gap, Town of	\$ 36.00
219	Martel Utility District	\$ 36.00
220	Petersburg Water System *	\$ 36.58
221	Clearfork Utility District *	\$ 36.66
222	Dyer Public Works	\$ 36.75
223	Pleasant View Utility District	\$ 37.17
224	McLemoresville Water System	\$ 37.25
225	North Overton Utility District	\$ 37.30
226	North Anderson Co. Utility District *	\$ 37.40
227	DeWhite Utility District (White/DeKalb Cos.) *	\$ 37.55
228	North Stewart Utility District *	\$ 37.67
229	Maynardville, City of	\$ 37.95
230	Adams-Cedar Hill Water System	\$ 38.00
231	Hallsdale-Powell Utility District *	\$ 38.09
232	New Market Utility District	\$ 38.20
233	Mowbray Mountain Utility District	\$ 38.27
234	Tarpley Shop Utility District	\$ 38.50
235	Lincoln Co. Board of Public Utilities *	\$ 38.57
236	West Warren-Viola Utility District	\$ 38.61
237	West Overton Utility District	\$ 38.90
238	La Grange, Town of	\$ 39.05
239	Maury County Board of Public Utilities	\$ 39.50
240	HB & TS Utility District (Williamson Co.)	\$ 39.54
241	Milcrofton Utility District	\$ 39.92
242	Monteagle Rural Utility District	\$ 40.00
243	Witt Utility District	\$ 40.33
244	Metro Utility Dept. - Lynchburg *	\$ 40.45
245	Brownlow Utility District	\$ 40.50

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED NUMERICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
246	Plateau Utility District	\$ 40.50
247	Watertown, City of	\$ 40.55
248	Mt. Carmel Public Utilities	\$ 40.75
249	Holston Utility District	\$ 40.80
250	South Bristol-Weaver Pike Utility Dist.	\$ 40.80
251	O'Connor Utility District	\$ 41.00
252	Cumberland Heights Utility District *	\$ 41.30
253	North Utility District (Decatur & Benton Cos.)	\$ 42.00
254	Cagle-Fredonia Water Utility District *	\$ 42.14
255	Copper Basin Board of Public Utility	\$ 42.39
256	Cumberland UD (Roane & Morgan Cos.) *	\$ 42.47
257	Sewanee Utility District	\$ 42.64
258	Sale Creek Utility District	\$ 43.48
259	Carderview Utility District	\$ 43.66
260	Baxter Waterworks *	\$ 44.24
261	South Side Utility District #3 *	\$ 44.50
262	New Canton Utility District	\$ 44.60
263	Laguado Utility District	\$ 44.76
264	Sylvia Tennessee City Pond Utility Dist. *	\$ 44.81
265	Sunbright Utility District *	\$ 45.27
266	Jackson County Utility District	\$ 46.13
267	Gladeville Utility District	\$ 46.60
268	West Cumberland Utility District *	\$ 47.05
269	Persia Utility District	\$ 47.13
270	Striggersville Utility District *	\$ 47.26
271	South Side Utility District #2 *	\$ 47.50
272	Fall River Utility District	\$ 47.75
273	Northwest Henry Utility District	\$ 49.32
274	DeKalb Utility District #4 *	\$ 50.00
275	Harbor Utility District	\$ 50.50
276	West Wilson Utility District	\$ 50.87
277	Woodlawn Utility District	\$ 52.67
278	Bon Aqua-Lyles Utility District	\$ 53.77
279	Lakeview Utility District (Hawkins Co.)	\$ 56.00
280	River Road Utility District	\$ 56.03
281	Webb Creek Utility District	\$ 60.24
282	Griffith Creek Utility District *	\$ 64.20
283	Cold Springs Utility District	\$ 65.50
284	Cordell Hull Utility District	\$ 70.51
285	Mid Hawkins County Utility District	\$ 72.90



## **SECTION 2**

### **2010 TENNESSEE WATER RATES**

#### **RANK OF 5,000 GALLON WATER BILL, SORTED ALPHABETICALLY**

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED ALPHABETICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
230	Adams-Cedar Hill Water System	\$ 38.00
118	Adamsville, Town of *	\$ 22.85
17	Alamo, City of *	\$ 12.50
156	Alcoa, City of	\$ 27.75
32	Algood, City of *	\$ 14.88
164	Alpha-Talbott Utility District	\$ 28.60
127	Aqua Utilities Company, Inc. *	\$ 23.56
140	Ardmore Water System *	\$ 25.70
217	Arthur-Shewanee Utility District *	\$ 35.99
193	Ashland City Water & Sewer *	\$ 31.70
39	Athens Utilities Board *	\$ 15.75
110	Atoka, Town of	\$ 22.25
151	Bangham Utility Water District	\$ 27.05
5	Bartlett, City of *	\$ 7.72
260	Baxter Waterworks *	\$ 44.24
209	Bedford Co. Utility District	\$ 34.13
157	Bell Buckle, Town of *	\$ 28.06
28	Bethel Springs, Town of	\$ 14.50
181	Big Creek Utility District	\$ 30.13
169	Big Sandy Waterworks *	\$ 29.48
104	Bloomingtondale Utility District *	\$ 22.00
170	Blountville Utility District	\$ 29.54
189	Bolivar, City of *	\$ 31.42
278	Bon Aqua-Lyles Utility District	\$ 53.77
195	Bradford, Town of *	\$ 31.93
69	Bristol, City of	\$ 18.70
245	Brownlow Utility District	\$ 40.50
22	Brownsville Utility Department	\$ 13.96
119	Byrdstown, Town of	\$ 23.02
254	Cagle-Fredonia Water Utility District *	\$ 42.14
44	Camden Water & Sewer	\$ 16.43
259	Carderview Utility District	\$ 43.66
205	Cedar Grove Utility District *	\$ 33.50
136	Celina, City of *	\$ 25.21
175	Center Grove-Winchester Springs UD	\$ 29.95
52	Centerville, Town of *	\$ 17.03
166	Chapel Hill, Town of *	\$ 29.30
199	Chuckey Utility District	\$ 32.63
173	Claiborne Utilities District	\$ 29.79
221	Clearfork Utility District *	\$ 36.66
58	Cleveland Utilities	\$ 17.76
42	Clinton Utilities Board	\$ 16.22
283	Cold Springs Utility District	\$ 65.50
18	Collierville, Town of	\$ 13.00
183	Collinwood, City of *	\$ 30.94
61	Columbia Power & Water System	\$ 18.00
196	Cons. Utility District of Rutherford Co. *	\$ 31.95
55	Cookeville, City of	\$ 17.39
255	Copper Basin Board of Public Utility	\$ 42.39



**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED ALPHABETICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
284	Cordell Hull Utility District	\$ 70.51
177	County-Wide Utility Dist. Of Crockett Co.	\$ 30.00
36	Covington, City of	\$ 15.32
190	Crab Orchard Utility District	\$ 31.45
211	Cross Anchor Utility District	\$ 34.61
8	Crossville, City of	\$ 9.35
218	Cumberland Gap, Town of	\$ 36.00
252	Cumberland Heights Utility District *	\$ 41.30
256	Cumberland UD (Roane & Morgan Cos.) *	\$ 42.47
171	Dandridge Water Department	\$ 29.66
46	Dayton, City of *	\$ 16.53
124	Decherd Water System	\$ 23.32
178	DeKalb Utility District #1 *	\$ 30.00
274	DeKalb Utility District #4 *	\$ 50.00
227	DeWhite Utility District (White/DeKalb Cos.) *	\$ 37.55
215	Dickson County Water Authority	\$ 35.60
184	Dover, Town of	\$ 31.10
90	Dowelltown Liberty Water *	\$ 20.88
19	Dresden, City of	\$ 13.04
2	Duck River Utility Commission	\$ 6.00
159	Dunlap, City of	\$ 28.30
222	Dyer Public Works	\$ 36.75
91	Dyersburg, City of *	\$ 20.98
161	E. Montgomery Utility District *	\$ 28.50
50	Eastside Utility District (Hamilton Co.)	\$ 16.95
78	Elbridge Water Association *	\$ 19.50
74	Elizabethton, City of	\$ 19.03
83	Englewood Water & Gas *	\$ 19.89
24	Erwin Utilities	\$ 14.07
56	Estill Springs, Town of	\$ 17.50
95	Etowah Utilities *	\$ 21.32
272	Fall River Utility District	\$ 47.75
120	Fayetteville Public Utilities *	\$ 23.03
216	Fentress County Utility District	\$ 35.83
188	First Utility District of Hawkins County	\$ 31.41
43	First Utility District of Knox County *	\$ 16.38
105	First Utility District of Tipton County *	\$ 22.00
108	Franklin, City of	\$ 22.10
153	Friendship, City of	\$ 27.50
174	Friendsville City Water Works *	\$ 29.85
68	Gallatin Public Utilities	\$ 18.54
20	Gallaway, City of *	\$ 13.20
34	Gatlinburg Utility Department	\$ 15.25
3	Germantown, City of *	\$ 6.75
176	Gibson Co. Municipal Water District *	\$ 29.98
267	Gladeville Utility District	\$ 46.60
121	Gleason, City of *	\$ 23.10
210	Glen Hills Utility District *	\$ 34.41
67	Grand Junction Water *	\$ 18.53

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED ALPHABETICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
200	Grandview Utility District	\$ 32.70
53	Graysville, City of *	\$ 17.13
107	Greenbrier, City of *	\$ 22.05
15	Greenfield, City of *	\$ 12.00
10	Greenville Water Commission	\$ 11.14
282	Griffith Creek Utility District *	\$ 64.20
133	Halls, Town of *	\$ 24.70
231	Hallsdale-Powell Utility District *	\$ 38.09
76	Hampton Utility District	\$ 19.25
275	Harbor Utility District	\$ 50.50
30	Harpeth Valley Utilities District *	\$ 14.65
117	Hartsville/Trousdale Water	\$ 22.68
240	HB & TS Utility District (Williamson Co.)	\$ 39.54
14	Hendersonville Utility District *	\$ 11.80
172	Henning, Town of	\$ 29.71
1	Hixson Utility District (Hamilton Co.)	\$ 4.89
249	Holston Utility District	\$ 40.80
137	Hornsby Water District	\$ 25.25
35	Humboldt Utilities	\$ 15.25
142	Huntingdon, Town of	\$ 26.01
132	Huntland Waterworks	\$ 24.56
214	Huntsville Utility District *	\$ 35.48
266	Jackson County Utility District	\$ 46.13
79	Jackson Energy Authority	\$ 19.63
9	Jefferson City	\$ 10.89
147	Jellico Water System	\$ 26.80
60	Johnson City Water & Sewer	\$ 17.99
113	Jonesborough, Town of *	\$ 22.50
81	Kenton, City of *	\$ 19.78
13	Kingsport, City of	\$ 11.49
180	Kingston, City of *	\$ 30.07
204	Knox Chapman Utility District	\$ 33.27
71	Knoxville Utilities Board	\$ 18.85
238	La Grange, Town of	\$ 39.05
87	Lafayette, City of	\$ 20.46
134	Lafollette Utilities	\$ 24.70
263	Laguardo Utility District	\$ 44.76
279	Lakeview Utility District (Hawkins Co.)	\$ 56.00
126	Lakewood, City of *	\$ 23.43
141	Lauderdale Co. Water System	\$ 25.75
49	LaVergne, City of	\$ 16.90
212	Lawrenceburg Utility Systems	\$ 34.68
146	Lebanon, City of *	\$ 26.77
155	Lenoir City Utilities Board	\$ 27.70
63	Leoma Utility District *	\$ 18.25
62	Lewisburg, City of *	\$ 18.20
38	Lexington Water Systems *	\$ 15.71
235	Lincoln Co. Board of Public Utilities *	\$ 38.57
72	Lobelville, City of	\$ 18.92

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED ALPHABETICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
45	Loudon Utilities Board *	\$ 16.50
128	Luttrell-Blaine-Corryton Utility District *	\$ 23.73
207	Lynnville, Town of *	\$ 33.58
6	Madison Suburban Utility District	\$ 8.50
89	Madisonville, City of *	\$ 20.55
114	Mallory Valley Utility District	\$ 22.50
23	Manchester, City of *	\$ 14.05
12	Marion Natural Gas *	\$ 11.48
219	Martel Utility District	\$ 36.00
47	Martin, City of	\$ 16.81
37	Maryville, City of	\$ 15.51
185	Maury City, Town of	\$ 31.25
239	Maury County Board of Public Utilities	\$ 39.50
229	Maynardville, City of	\$ 37.95
65	McKenzie, City of	\$ 18.48
224	McLemoresville Water System	\$ 37.25
84	McMinnville, City of	\$ 19.95
7	Memphis Light Gas & Water	\$ 8.73
244	Metro Utility Dept. - Lynchburg *	\$ 40.45
21	Metro Water Services - Nashville	\$ 13.41
115	Michie, City of	\$ 22.50
285	Mid Hawkins County Utility District	\$ 72.90
31	Middleton, City of	\$ 14.70
66	Milan Dept. of Public Utilities	\$ 18.52
241	Milcrofton Utility District	\$ 39.92
16	Millington, City of *	\$ 12.00
242	Monteagle Rural Utility District	\$ 40.00
122	Monterey, Town of *	\$ 23.25
33	Morristown Utility Systems	\$ 14.90
149	Moscow Water Department	\$ 27.00
77	Mosheum, Town of *	\$ 19.43
85	Mount Pleasant, City of	\$ 19.98
123	Mountain City, Town of	\$ 23.30
233	Mowbray Mountain Utility District	\$ 38.27
248	Mt. Carmel Public Utilities	\$ 40.75
11	Munford, City of	\$ 11.25
112	Murfreesboro Water & Sewer	\$ 22.41
262	New Canton Utility District	\$ 44.60
167	New Johnsonville, City of	\$ 29.34
232	New Market Utility District	\$ 38.20
100	Newbern, City of	\$ 21.85
93	Niota Water Department *	\$ 21.01
154	Nolensville/College Grove UD *	\$ 27.58
131	Norris Water Commission	\$ 24.15
226	North Anderson Co. Utility District *	\$ 37.40
225	North Overton Utility District	\$ 37.30
228	North Stewart Utility District *	\$ 37.67
253	North Utility District (Decatur & Benton Cos.)	\$ 42.00
208	North Utility District (Rhea County) *	\$ 33.75

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED ALPHABETICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
194	Northeast Henry Co Utility District	\$ 31.70
145	Northeast Knox Utility District	\$ 26.40
98	Northwest Dyersburg Utility District *	\$ 21.65
273	Northwest Henry Utility District	\$ 49.32
106	Obion, Town of *	\$ 22.01
158	Ocoee Utility District	\$ 28.25
251	O'Connor Utility District	\$ 41.00
143	Old Gainesboro Road Utility District *	\$ 26.10
25	Old Hickory Utility District *	\$ 14.15
82	Oliver Springs Water Department *	\$ 19.80
64	Oneida Water & Wastewater	\$ 18.40
54	Paris Board of Public Utilities	\$ 17.33
139	Perryville Utility District	\$ 25.50
269	Persia Utility District	\$ 47.13
220	Petersburg Water System *	\$ 36.58
186	Pigeon Forge Utility	\$ 31.27
197	Pikeville, City of	\$ 32.13
103	Piperton Water System	\$ 21.99
246	Plateau Utility District	\$ 40.50
223	Pleasant View Utility District	\$ 37.17
116	Poplar Grove Utility District *	\$ 22.50
73	Portland, City of	\$ 18.93
111	Pulaski, City of	\$ 22.36
94	Riceville Utility District	\$ 21.04
96	Ripley Gas & Water *	\$ 21.45
280	River Road Utility District	\$ 56.03
88	Rockwood Water Sewer & Gas	\$ 20.48
150	Rogersville Water Department	\$ 27.01
4	Rossville, Town of	\$ 7.39
80	Russellville-Whitesburg Utility District *	\$ 19.75
201	Rutledge, Town of	\$ 32.99
258	Sale Creek Utility District	\$ 43.48
162	Savannah Valley Utility District *	\$ 28.50
51	Savannah, City of	\$ 17.00
109	Scotts Hill Water Department	\$ 22.15
125	Sevierville, City of *	\$ 23.39
257	Sewanee Utility District	\$ 42.64
206	Shady Grove Utility District	\$ 33.50
41	Sharon, City of	\$ 16.11
97	Shelbyville Power Water & Sewerage *	\$ 21.50
102	Signal Mountain, Town of	\$ 21.96
57	Smithville, City of	\$ 17.50
27	Smyrna Utilities	\$ 14.40
152	Soddy Daisy Falling Water UD	\$ 27.24
40	Somerville Water & Gas	\$ 15.84
160	South Blount Utility District *	\$ 28.49
250	South Bristol-Weaver Pike Utility Dist.	\$ 40.80
138	South Elizabethton Utility *	\$ 25.25
148	South Fulton, City of *	\$ 26.80

**TENNESSEE WATER RATES**

June 1, 2010

**RANK OF 5,000 GALLON WATER BILL - SORTED ALPHABETICALLY**

<b>RANK</b>	<b>UTILITY COMPANY</b>	<b>5,000 GAL BILL FOR</b>
198	South Paris Water Co-Operative *	\$ 32.17
202	South Side Utility District #1 *	\$ 33.00
271	South Side Utility District #2 *	\$ 47.50
261	South Side Utility District #3 *	\$ 44.50
75	Sparta Electric & Water System *	\$ 19.10
187	Spring City, Town of *	\$ 31.30
26	Spring Hill, City of *	\$ 14.34
48	Springfield Water & Wastewater Dept. *	\$ 16.86
270	Striggersville Utility District *	\$ 47.26
179	Summertown Utility District	\$ 30.00
265	Sunbright Utility District *	\$ 45.27
163	Surgoinsville Utility District *	\$ 28.50
101	Sweetwater Utilities Board	\$ 21.87
264	Sylvia Tennessee City Pond Utility Dist. *	\$ 44.81
234	Tarpley Shop Utility District	\$ 38.50
130	Tellico Area Services System	\$ 24.09
144	Tennessee Ridge, City of *	\$ 26.16
129	Tiptonville, Town of	\$ 24.00
86	Toone, Town of	\$ 20.00
92	Trenton Light & Water	\$ 21.00
70	Tullahoma Utilities Board *	\$ 18.80
29	Union City, City of	\$ 14.50
203	Vanleer, Town of *	\$ 33.00
192	Walden's Ridge Utility District *	\$ 31.52
182	Warren County Utility District *	\$ 30.83
247	Watertown, City of	\$ 40.55
168	Waverly Water System *	\$ 29.43
165	Waynesboro, City of	\$ 28.78
281	Webb Creek Utility District	\$ 60.24
268	West Cumberland Utility District *	\$ 47.05
99	West Knox Utility District	\$ 21.79
237	West Overton Utility District	\$ 38.90
236	West Warren-Viola Utility District	\$ 38.61
276	West Wilson Utility District	\$ 50.87
213	White House Utility District	\$ 35.15
59	White Pine, Town of *	\$ 17.87
135	Winchester Utilities	\$ 24.89
243	Witt Utility District	\$ 40.33
191	Woodbury Water & Sewer Department	\$ 31.45
277	Woodlawn Utility District	\$ 52.67