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February 11, 2011

Via Hand-Delivery

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

filed electronically in docket office on 02/11/11

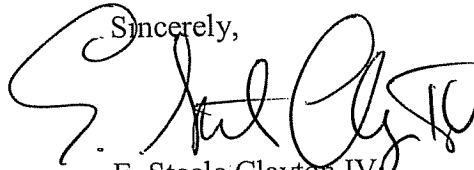
**Re: *Petition Of Tennessee American Water Company To Change And Increase
Certain Rates And Charges So As To Permit It To Earn A Fair And Adequate
Rate Of Return On Its Property Used And Useful In Furnishing Water Service
To Its Customers***
Docket No. 10-00189

Dear Chairman Freeman:

Enclosed please find an original and five (5) copies of Tennessee American Water Company's Supplemental Responses to the Chattanooga Regional Manufacturers Association's Discovery Requests, Questions 24 and 25. These Supplemental Responses are intended to update our Responses in light of the Company's February 8, 2011 filing of its rebuttal testimony. In addition to the specific Responses supplemented here, to the extent the Company's rebuttal testimony is applicable to any other Response, the Company hereby incorporates its rebuttal testimony as a supplement to its previous responses. This material is being filed today by way of email to the Tennessee Regulatory Authority Docket Manager, Sharla Dillon also.

Please file the original and four copies of this material 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,

E. Steele Clayton IV

ESCIV/smb
Enclosures

Chairman Mary Freeman
February 11, 2011
Page 2

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

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST SET OF DATA REQUESTS OF THE
CHATTANOOGA MANUFACTURERS ASSOCIATION**

Responsible Witness: **Michael A. Miller**

Question:

24. Please identify all persons known to you, your attorney(s) or other agent(s), who have knowledge, information or possess any document(s) or claim to have knowledge, information or possess any document(s) which support or contradict each or any fact you rely upon to support your petitions, contentions and request(s) for relief in this docket, or any published materials by (or for) the Company, AWW, AWWC, and any Affiliate.

Response:

The Company objects to this question on the grounds that the request is overly broad, unduly burdensome and seeks information that is protected by the attorney client privilege and/or work product doctrine. Without waiving these objections the Company's direct testimony has been filed with the TRA and fully addresses and supports the Company's application and tariffs filed in this proceeding. Each witnesses' testimony, if applicable, references exhibits, appendices, published documents and other material relied on in the positions and opinions provided in their testimony. At this time the Company can not identify any additional witnesses or issues that will be addressed on rebuttal until it receives and reviews the positions taken and issues raised in the intervenors' filed testimony and exhibits, as well as the discovery responses of the intervenors. The Company will supplement this response as required.

February 11, 2011 Supplemental Response:

Please see the Company's rebuttal testimony and the exhibits attached thereto that was filed with the TRA for additional support of its application and tariffs filed in this proceeding.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 10-00189
FIRST SET OF DATA REQUESTS OF THE
CHATTANOOGA MANUFACTURERS ASSOCIATION**

Responsible Witness: **James H. Vander Weide/Dr. Edward L. Spitznagel Jr./
Bernard L. Uffelman/James I. Warren**

Question:

25. Please identify and produce a copy of all articles, journals, books or speeches written by or co-written in the past ten (10) years by any expert witness(es) or other witness(es) of the Company, whether published or not, relative to any issue raised in this proceeding.

Response:

The Company objects to this request on the grounds that the requested information is unduly burdensome and overly broad. Without waiving these objections, the Publications written by the expert witnesses were identified in their testimony provided in the original filing of this rate case.

February 11, 2011 Supplemental Response:

Please see Appendix 1 of Rebuttal Exhibit BLU-1 to Mr. Uffelman's rebuttal testimony which identifies Mr. Uffelman's authored Publications and Presentations. For a list of Mr. Warren's Speeches and Presentations please see the Company's February 11, 2011 supplemental response to TN-CAPD-01-SUPPLEMENTAL-Q81 and the attachments appended thereto.

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

**PETITION OF TENNESSEE AMERICAN)
WATER COMPANY TO CHANGE AND)
INCREASE CERTAIN RATES AND)
CHARGES SO AS TO PERMIT IT TO)
EARN A FAIR AND ADEQUATE)
RATE OF RETURN ON ITS PROPERTY)
USED AND USEFUL IN FURNISHING)
WATER SERVICE TO ITS CUSTOMERS)**

DOCKET NO. 10-00189

AFFIDAVIT

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA

I, MICHAEL A. MILLER, Treasurer/Comptroller for Tennessee American Water Company, do hereby certify that the foregoing responses to the Supplemental Responses to the Consumer Advocate and Protection Division, City of Chattanooga and Chattanooga Regional Manufacturers Association were prepared by me or under my supervision and are true and accurate to the best of my knowledge and information.

DATED this 9th day of February, 2011.

Michael A. Miller
(signature)

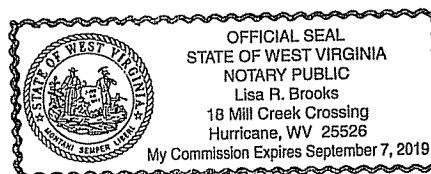
Michael A. Miller
(printed name)

Sworn to and subscribed before me this 9th day of February, 2011.

Lisa R. Brooks
NOTARY PUBLIC

My Commission Expires:

September 7, 2019



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by way of the method(s) indicated, on this the 11th day of February, 2011, upon the following:

- ☒ Hand-Delivery
- ☐ U.S. Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Email

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