

# BASS

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November 30, 2011

## VIA HAND DELIVERY

Chairman Kenneth C. Hill  
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 Hill:

Enclosed please find an original and five (5) copies of Tennessee-American Water Company's Motion for Extension of Time to File Response to Request for Enforcement of Order and Related Relief.

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,



David Killion

Enclosures

cc: 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)  
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)

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

**IN RE:**

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

**Docket No. 10-00189**

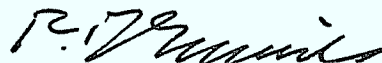
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**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO REQUEST FOR  
ENFORCEMENT OF ORDER AND RELATED RELIEF**

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Tennessee American Water Company ("TAWC"), by and through counsel, hereby moves the Authority for a 10-day extension in which to file a response to the Utility Workers Union of America, AFL-CIO's ("UWUA") Request for Enforcement of Order and Related Relief. In support of this motion TAWC states that the additional time is necessary to prepare a response to the UWUA's filing. Counsel for TAWC and the UWUA have conferred and the UWUA has stated it has no opposition to granting a 10-day extension in which to file a response.

Respectfully submitted,



R. Dale Grimes (#006223)  
E. Steele Clayton (#017298)  
C. David Killion (#026412)  
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*Attorneys for Petitioner  
Tennessee American Water Company*

### 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 30<sup>th</sup> day of November, 2011, upon the following:

<input type="checkbox"/> Hand-Delivery	Ryan McGehee, Esq.
<input checked="" type="checkbox"/> U.S. Mail	Counsel for the Consumer Advocate
<input type="checkbox"/> Facsimile	and Protection Division
<input type="checkbox"/> Overnight	Office of the Attorney General
<input checked="" type="checkbox"/> Email	425 5th Avenue North, 2nd Floor
	Nashville, TN 37243-0491
<input type="checkbox"/> Hand-Delivery	David C. Higney, Esq.
<input checked="" type="checkbox"/> U.S. Mail	Counsel for Chattanooga Regional
<input type="checkbox"/> Facsimile	Manufacturers Association
<input type="checkbox"/> Overnight	Grant, Konvalinka & Harrison, P.C.
<input checked="" type="checkbox"/> Email	633 Chestnut Street, 9th Floor
	Chattanooga, TN 37450
<input type="checkbox"/> Hand-Delivery	Henry M. Walker, Esq.
<input checked="" type="checkbox"/> U.S. Mail	Counsel for Chattanooga Regional
<input type="checkbox"/> Facsimile	Manufacturers Association
<input type="checkbox"/> Overnight	Bradley, Arant, Boult, Cummings, PLC
<input checked="" type="checkbox"/> Email	1600 Division Street, Suite 700
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<input type="checkbox"/> Hand-Delivery	Michael A. McMahan, Esq.
<input checked="" type="checkbox"/> U.S. Mail	Valerie L. Malueg, Esq.
<input type="checkbox"/> Facsimile	City of Chattanooga (Hamilton County)
<input type="checkbox"/> Overnight	Office of the City Attorney
<input checked="" type="checkbox"/> Email	100 East 11th Street, Suite 200
	Chattanooga, TN 37402
<input type="checkbox"/> Hand-Delivery	Frederick L. Hitchcock, Esq.
<input checked="" type="checkbox"/> U.S. Mail	Harold L. North, Jr., Esq.
<input type="checkbox"/> Facsimile	Counsel for City of Chattanooga
<input type="checkbox"/> Overnight	Chambliss, Bahner & Stophel, P.C.
<input checked="" type="checkbox"/> Email	1000 Tallan Building
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Mark Brooks, Esq.  
Counsel for Utility Workers Union of America,  
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