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July 6, 2012

Via E-Mail and USPS

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Chairman Kenneth C. Hill, Ed.D. c/o Ms. Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Petition of Tennessee American Water Company

Docket No. 12-00049

Dear Chairman Hill:

Enclosed please find an original and five (5) copies of the following:

- City of Chattanooga's Motion for Leave to Issue More Than Forty Discovery Requests;
- City of Chattanooga's Memorandum in Support of the City of Chattanooga's Motion for Leave to Issue More Than Forty Discovery Requests;
- City of Chattanooga's First Discovery Requests to Petitioner Tennessee American Water Company;
- City of Chattanooga's First Requests for Admission.

Please file these appropriately in the referenced docket.

I would appreciate you stamping the extra copies of the documents as "filed," and returning them to me in the enclosed, self-addressed, stamped envelope.

With best regards, I am

Frederick L. Hitchcock

FLH:pgh Enclosures Chairman Kenneth C. Hill, Ed.D. July 6, 2012 Page 2

cc: Mr. Melvin J. Malone (w/encl.)

Mr. Lindsey W. Ingram, III (w/encl.)

Mr. Robert E. Cooper, Jr. (w/encl.)

Mr. Ryan L. McGehee (w/encl.)

Mr. Vance L. Broemel (w/encl.)

Ms. Mary L. White

Mr. David C. Higney (w/encl.)

Mr. Michael A. McMahan (w/encl.)

Ms. Valerie L. Malueg

Ms. Kelly Cashman-Grams (w/ encl., via email)

Ms. Monica Smith-Ashford (w/ encl., via email)

Ms. Shilina Chatterjee Brown (w/ encl., via email)

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION FOR A GENERAL RATE)	
INCREASE, IMPLEMENTATION OF A)	Docket No. 12-00049
DISTRIBUTION SYSTEM)	
INFRASTRUCTURE CHARGE AND THE)	
ESTABLISHMENT OF TRACKING		
MECHANISMS FOR PURCHASED		
POWER, PENSIONS AND CHEMICAL		
EXPENSES		

CITY OF CHATTANOOGA'S MOTION FOR LEAVE TO ISSUE MORE THAN FORTY DISCOVERY REQUESTS

Intervenor, the City of Chattanooga ("Chattanooga"), by and through counsel, hereby submits this motion, pursuant to TRA Rule 1220-1-2-.11(5)(a), requesting permission to issue more than forty (40) discovery requests to Tennessee American Water Company ("TAWC"). Pursuant to TRA Rule 1220-1-2-.11(5)(a), Chattanooga seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests and the discovery requests themselves.

Respectfully Submitted,

OFFICE OF THE CITY ATTORNEY

Michael A. McMahan (BPR No. 000) 10)

Valerie L. Malueg (BPR No. 023763)

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing pleading was emailed and was served upon the following person(s) via \square hand delivery or \square United States first class mail with proper postage applied thereon to ensure prompt delivery:

Mr. Melvin J. Malone Butler, Snow, O'Mara, Stevens & Cannada, PLLC 1200 One Nashville Place 150 Fourth Avenue, North Nashville, TN 37219-2433

Mr. Robert E. Cooper, Jr.
Attorney General and Reporter
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202-0207

Mr. Lindsey W. Ingram, III Stoll Keenon Ogden PLLC 300 West Vine Street Suite 2100 Lexington, KY 40507

Mr. Ryan McGehee Assistant Attorney General Office of the Attorney General Consumer Advocate and Protection Division P.O. Box 20207 Nashville, TN 37202-0207

This 6th day of July, 2012.