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September 7, 2012

**VIA HAND DELIVERY**

Hon. Kenneth C. Hill, Chairman  
c/o Sharla Dillon  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

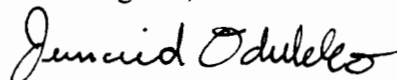
**RE: Petition Of Tennessee American Water Company To Change And Increase  
Certain Rates And Charges So Far As To Permit It To Earn A Fair And  
Adequate Rate Of Return On Its Property Used And Useful In Furnishing  
Water Service To Its Customers, TRA Docket No. 12-00049**

Dear Chairman Hill:

With this letter, I enclose the originals and 4 copies of Tennessee American Water Company's data requests to the Consumer Advocate Division, the City of Chattanooga, and the Town of Signal Mountain.

Please don't hesitate to contact me should you have any questions.

Best regards,

  
Junaid A. Odubeko

JAO:sc  
Enclosures

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BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC

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

<b>PETITION OF TENNESSEE AMERICAN</b>	)	
<b>WATER COMPANY TO CHANGE AND</b>	)	
<b>INCREASE CERTAIN RATES AND</b>	)	
<b>CHARGES SO FAR AS TO PERMIT IT TO</b>	)	<b>DOCKET NO. 12-00049</b>
<b>EARN A FAIR AND ADEQUATE</b>	)	
<b>RATE OF RETURN ON ITS PROPERTY</b>	)	
<b>USED AND USEFUL IN FURNISHING</b>	)	
<b>WATER SERVICE TO ITS CUSTOMERS</b>	)	

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**TENNESSEE-AMERICAN WATER COMPANY'S DATA REQUESTS TO THE CITY  
OF CHATTANOOGA**

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Tennessee-American Water Company ("TAWC") respectfully submits the following data requests to the City of Chattanooga ("Chattanooga"). The responses are to be produced at the office of the undersigned counsel, Mr. Melvin J. Malone, at Butler, Snow, O'Mara, Stevens, and Cannada, PLLC, 1200 One Nashville Place, 150 Fourth Avenue, North, Nashville, Tennessee, 37219 on or before the close of business on September 26, 2012.

**Instructions**

As used herein, "Documents" include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to Chattanooga, its witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if Chattanooga receives or generates additional information within the

scope of these requests between the time of the response and the time of any hearing conducted herein.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self-evident to a person not familiar with the document or file.

E. If Chattanooga has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for TAWC as soon as possible.

F. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

G. In the event any document requested has been destroyed or transferred beyond the control of the Chattanooga or any of its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer TAWC to the record where the document is located.

**DISCOVERY REQUEST NO. 1:**

To the extent not previously provided, please provide electronic copies (on CD) of all tables, charts, diagrams, schedules, and exhibits (collectively, "Exhibits") contained in the testimony of Michael P. Gorman for Chattanooga. Please include all workpapers, schedules, underlying computations and supporting documentation used and relied upon by Mr. Gorman in the preparation of his testimony, including the preparation of all Exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.

**RESPONSE:**

**DISCOVERY REQUEST NO. 2:**

To the extent not previously provided, please provide copies of all schedules and underlying computations and workpapers developed in the analysis by Chattanooga and/or its witness, Mr. Gorman, of TAWC's requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic and forecasted data, and the cost of service model.

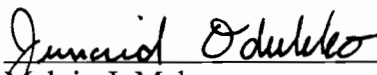
**RESPONSE:**

**DISCOVERY REQUEST NO. 3:**

Refer to Michael P. Gorman's testimony on page 6, lines 19 through 21, which states that "The net effect of recognizing these reductions to the ADIT balance is an increase in rate base. This is a concern since many of the regulatory assets she identifies appear to already be included in rate base." Please identify specifically where the reductions to the ADIT balance were already included as regulatory assets in rate base.

**RESPONSE:**

Respectfully submitted,

By:   
Melvin J. Malone  
Junaid Odubeko

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Attorneys for Tennessee American Water Company

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via either U.S. Mail or electronically on this 7th day of September, 2012, to:

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Attorney for Tennessee-American Water Company