

RECEIVED

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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

) T.R.A. DOCKET ROOM

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DOCKET NO. 12-00049

TENNESSEE-AMERICAN WATER COMPANY'S DATA REQUESTS TO THE
CONSUMER ADVOCATE DIVISION

Tennessee-American Water Company ("TAWC") respectfully submits the following data requests to the Consumer Advocate Division of the Tennessee Attorney General's Office ("CAD"). 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 the CAD, 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 the CAD 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 the CAD 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 CAD 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 all witnesses for the CAD. Please include all workpapers, schedules, underlying computations and supporting documentation used and relied upon by each witness 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 the CAD and/or its witnesses 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 page P30 of the workpapers of Terry Buckner. Please provide copies of all supporting documents, computations and workpapers used to arrive at the "Property Tax Amount" listed on Exhibit T-OTAX1, year 2012, and also all the supporting documents, calculations and workpapers used to arrive at all "Gross Assessments" listed on Exhibit T-OTAX1.

RESPONSE:

DISCOVERY REQUEST NO. 4:

Refer to the testimony of Dr. Christopher C. Klein. Please provide a copy of any and all testimony that Dr. Klein has filed in any state or federal regulatory proceeding in which double leveraging is mentioned and/or discussed.

RESPONSE:

DISCOVERY REQUEST NO. 5:

Refer to the testimony of Dr. Christopher C. Klein. Please provide a list of each and every cost of equity and/or weighted cost of capital that Dr. Klein has recommended in the last five (5) years. Please include the jurisdiction, docket and/or case number, and name of the proceeding in the response.

RESPONSE:

DISCOVERY REQUEST NO. 6:

Refer to page 15 of the testimony of Dr. Christopher C. Klein. Please provide a list of all companies that were eliminated from his discounted cash flow ("DCF") analysis because they "were not primarily utilities or for whom adequate earnings and dividend data were not available."

RESPONSE:

DISCOVERY REQUEST NO. 7:

Refer to Exhibit Page 2 of 21 of the testimony of Dr. Christopher C. Klein. Please provide the dollar amounts represented by the percentages shown in the "%" column (i.e., column 2). Also, please provide the source for each dollar amount and, for any amounts calculated by Mr. Klein, please show how each amount was calculated.

RESPONSE:

Respectfully submitted,

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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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