

RECEIVED
BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE 2012 SEP -7 PM 3: 30

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
DOCKET NO. 12-00049

**TENNESSEE-AMERICAN WATER COMPANY'S DATA REQUESTS TO
THE TOWN OF SIGNAL MOUNTAIN**

Tennessee-American Water Company ("TAWC") respectfully submits the following data request to the Town of Signal Mountain. 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 Town of Signal Mountain, 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 Town of Signal Mountain 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 Town of Signal Mountain 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 Town of Signal Mountain 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.

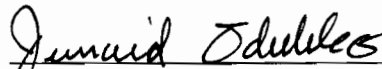
DISCOVERY REQUEST NO. 1:

What is the average quarterly usage and quarterly bill for an average residential customer served by the Town of Signal Mountain?

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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