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November 14, 2013

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**VIA HAND DELIVERY**

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

**RE: Petition of Tennessee American Water Company, for Approval of a Qualified Infrastructure Investment Program, an Economic Development Investment Rider, a Safety and Environmental Rider and Pass Throughs for Purchased Power, Chemicals, Purchased Water, Wheeling Water Costs, Waste Disposal, and TRA Inspection Fees, TRA Docket No. 13-00130**

Chairman Allison:

With this letter, I enclose Tennessee-American Water Company's Data Requests to the Consumer Advocate Division in the above-referenced matter.

We appreciate your filing these data requests. Please let me know if you have any questions.

With best regards, I am

Very truly yours,



Junaid A. Odubeko

JAO:sc

enclosures

cc: Joe Shirley  
Vance Broemel

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

<b>PETITION OF</b>	)	
<b>TENNESSEE-AMERICAN WATER</b>	)	
<b>COMPANY, FOR APPROVAL OF</b>	)	<b>DOCKET NO. 13-00130</b>
<b>A QUALIFIED INFRASTRUCTURE</b>	)	
<b>INVESTMENT PROGRAM, AN</b>	)	
<b>ECONOMIC DEVELOPMENT</b>	)	
<b>INVESTMENT RIDER, A SAFETY</b>	)	
<b>AND ENVIRONMENTAL</b>	)	
<b>COMPLIANCE RIDER, AND</b>	)	
<b>PASS-THROUGHS FOR PURCHASED</b>	)	
<b>POWER, CHEMICALS, PURCHASED</b>	)	
<b>WATER, WHEELING WATER COSTS,</b>	)	
<b>WASTE DISPOSAL, AND TRA</b>	)	
<b>INSPECTION FEE</b>	)	

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

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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, LLP, 150 3<sup>rd</sup> Avenue South, Suite 1600, Nashville, Tennessee, 37201.

**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.

### **DATA REQUESTS**

DATA REQUEST NO. 1: Please provide electronic copies (on CD) of all tables, charts, diagrams, schedules, and exhibits (collectively, "Exhibits") the CAD intends to use in the testimony of all witnesses for the CAD. Please include all workpapers, schedules, underlying computations and supporting documentation that each witness plans to use or rely on 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:**

DATA REQUEST NO. 2: Please identify each person whom the Consumer Advocate expects to call as an expert witness at the hearing on the merits of this matter. For each such witness:

- a. Please produce a curriculum vitae detailing the educational background, work experience and professional achievements that you contend qualify the witness to render testimony on the issues on which he or she will testify at the hearing on the merits of this matter.
- b. Please produce all pre-filed testimony, work papers, calculations and other documents that you contend support the facts, opinions, conclusions, proposals and recommendations to be presented in the testimony of the witness at the hearing on the merits of this matter.
- c. Please produce all work papers, calculations and other documents created, used, referenced or relied on by the witness in this matter.

RESPONSE:

DATA REQUEST NO. 3: Please produce copies of all hearing exhibits and other documents that you plan to introduce, use or reference at the hearing on the merits of this matter.

RESPONSE:

Respectfully submitted:

By: Junaid Odubeko

Melvin J. Malone  
Junaid Odubeko  
Butler Snow LLP  
The Pinnacle at Symphony Place  
150 3rd Avenue South, Suite 1600  
Nashville, TN 37201

*Attorneys for Tennessee-American Water Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served electronically and via hand delivery to the following this 14<sup>th</sup> day of November, 2013.

Joe Shirley  
Vance Broemel  
Consumer Advocate and Protection Division  
Office of the Attorney General  
P.O. Box 20207  
Nashville, TN 37202

Junaid Odubeko