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March 18, 2015

Via Email and FedEx

Hon. Herbert H. Hilliard, Chairman
c/o Ms. Sharla Dillon
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

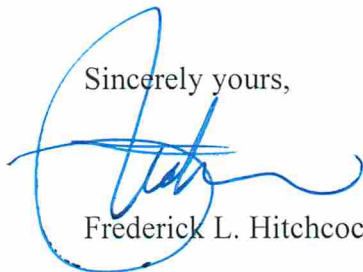
Re: TRA Docket No. 14-00121

Dear Chairman Hilliard:

Enclosed please find an original and five (5) copies of the City of Chattanooga's First Discovery Requests to Petitioner Tennessee American Water Company. I would appreciate you filing this document electronically and stamping the extra hard copy of the document as "filed," and returning it to me in the enclosed, self-addressed and stamped envelope.

With best regards, I am

Sincerely yours,



Frederick L. Hitchcock

FLH:pgh
Enclosures

cc: Mr. Wade Hinton (w/ encl.)
Mr. Vance Broemel (w/ encl.)
Mr. Wayne Irvin (w/ encl.)
Mr. Melvin Malone (w/ encl.)
Ms. Valeria Gomez (w/ encl.)

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

IN RE:

**PETITION OF TENNESSEE-AMERICAN
WATER COMPANY REGARDING THE
2015 INVESTMENT AND RELATED
EXPENSES UNDER QUALIFIED
INFRASTRUCTURE INVESTMENT
PROGRAM RIDER, THE ECONOMIC
DEVELOPMENT INVESTMENT RIDER,
AND THE SAFETY AND
ENVIRONMENTAL COMPLIANCE RIDER**

Docket No. 14-00121

**CITY OF CHATTANOOGA'S FIRST DISCOVERY REQUESTS TO PETITIONER
TENNESSEE AMERICAN WATER COMPANY**

Intervenor, the City of Chattanooga ("Chattanooga"), by and through counsel, submits the following Discovery Requests (the "Requests") to Petitioner, Tennessee American Water Company ("TAWC") pursuant to TRA Rule 1220-1-2-.11 and the Tennessee Rules of Civil Procedure. The responses to the Requests shall be under oath. Documents responsive to the Requests shall be delivered to the offices of Chattanooga's special counsel, 605 Chestnut Street, Suite 1700, Chattanooga, Tennessee 37450

INSTRUCTIONS AND DEFINITIONS

A. These Requests are to be deemed as continuing, and you are requested to provide, by way of supplemental responses, such additional information as may be hereafter obtained by you or any person on your behalf which augment, supplement, or otherwise modify responses to these Requests.

B. The word "***Document***" shall include and mean, without limitation, the original and each draft and copy of any kind of written, printed, typed, recorded, or graphic matter, however

produced or reproduced, of any kind or description, whether sent or received or neither. The term shall further include, without limitation, originals, all copies, all images, all backup or archived copies, and all drafts of: papers, books, writings, memoranda, letters, electronic messages, electronic files, computer files, emails, correspondence, telegraphs, notes, book entries, accounts, statements of accounts, checks, cancelled checks, minutes of meetings, contracts, cables, telex messages, intra-office communications, intra-departmental communications, recordings or notes of telephone conversations, recordings or notes of other conversations, or meetings, affidavits, schedules, tabulations, calculations, computer files, and all other written or electronic records. The term “**Document**” includes the term “**Communication**”.

C. The term “**Communication**” means any oral or written statement conveyed by one person or entity to another person or entity by whatever means, including electronic **Communications**, emails, and computer files.

D. If any **Document** called for by any request herein is to be withheld pursuant to any purported privilege or immunity:

- a) State the basis for such claim of privilege or immunity (e.g., attorney-client privilege, work product doctrine);
- b) **Identify** the **Document** being withheld by stating the name or title of the **Document**; the type of **Document**; its date, author, addressee, and all recipients of copies; a general description of its subject matter; its present location(s) and custodian(s); and each person who, to your knowledge, has seen it; and
- c) State the number and/or portion of the request to which each such **Document** would be responsive.

E. ***“Explain”*** means to provide a detailed explanation of the specified subject matter and to provide all ***Documents*** reflecting, recording, referring to, reporting, or relating to the subject matter or the response.

F. ***“Identify”*** means: (i) when used with reference to an individual person, to state his/her full name, employer, job title, present or last known residence address and telephone number, and present or last known business address and telephone number; and (ii) when used with reference to a ***Document***, means to state the type of the ***Document***, its date, author, addressee, any other recipient(s), general subject matter, present location, and custodian. If any ***Document*** to be identified was, but no longer is, in your possession, state the disposition that was made of it and the reasons, facts, or circumstances associated with its disposition.

DISCOVERY REQUESTS

1. Please state the Construction Work In Progress amount for Citico Improvement Phase 1B (“Citico 1B”) included in Docket No. 10-00189. Please provide references to the record in Docket No. 10-00189 describing the Citico 1B project and all expenses and investment attributable to it (by document, page, and line, if available).

RESPONSE:

2. Please state all other investments or expenses relating to Citico 1B included in Docket No. 10-00189. Please provide references to the record in Docket No. 10-00189 describing the Citico 1B project and all expenses and investment attributable to it (by document, page, and line, if available).

RESPONSE:

3. Please state the total of all amounts, if any, that were included in Utility Plant in Service, in Construction Work in Progress, or in any other manner in Docket Nos. 12-00049 or 13-00130 for Citico 1B. Please provide applicable references to the record in the respective dockets to each mention or discussion of Citico 1B and all expenses and investment attributable to them (by document, page, and line, if available).

RESPONSE:

4. Please state the total amount of rate revenue that has been recovered by TAWC from the effective date of the revised tariffs in Docket No. 10-00189 through December 31, 2014 attributable to the investment for Citico 1B approved in Docket No. 10-00189, including, without limitation, return on investment, depreciation, taxes, and other expenses or amounts. Please identify each item separately.

RESPONSE:

5. Please state the total of all amounts, included in Utility Plant in Service, in Construction Work in Progress, or in any other manner in Docket No. 14-00121 for Citico 1B. Please provide applicable references to the record in the docket to each mention or discussion of Citico 1B and all expenses and investment attributable to them (by document, page, and line, if available).

RESPONSE:

6. Please state the total of all expenditures, if any, that were included in Utility Plant in Service, in Construction Work in Progress, or in any other form in Docket Nos. 10-00189, 12-00049, or 13-00130 for or related to any improvements to TAWC's wastewater treatment or handling facilities or equipment, identifying the amount included in each Docket. Please provide applicable references to the record in the respective dockets to each mention or discussion of TAWC's wastewater treatment or handling facilities or equipment and all expenses and investment attributable to them (by document, page, and line, if available).

RESPONSE:

7. Please identify each of the projects included in Item B Mains Replaced-Restored in Docket No. 13-00130 (the "2014 Item B Projects"), listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was completed. Please provide relevant references to the record in Docket No. 13-00130 (by document, page, and line, if available).

RESPONSE:

8. Please state the expenditures actually made for each of the 2014 Item B Projects during 2014.

RESPONSE:

9. Please identify each of the projects included in Item B Mains Replaced-Restored in Docket No. 14-00121 (the "2015 Item B Projects"), listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was

completed. Please provide relevant references to the record in Docket No. 14-00121 (by document, page, and line, if available).

RESPONSE:

10. Please state the total of all expenditures, if any, that were included in Utility Plant in Service, in Construction Work in Progress, or in any other manner in each of Docket Nos. 10-00189 or 12-00049 for or related to any 2014 Item B Projects or 2015 Item B Projects, identifying the amount included in each Docket. Please provide relevant references to the record in Dockets No. 10-00189 and 12-00049 (by document, page, and line, if available).

RESPONSE:

11. Please (a) state the total amount of expenditures included for each of Item C Mains - Unscheduled and for Item D Mains – Relocated (“2014 Item C and D Mains”) in Docket No. 13-00130. Please provide relevant references to the record in Docket No. 13-00130 (by document, page, and line, if available).

RESPONSE:

12. Please identify the 2014 Item C and D Mains actually completed during 2014, listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was completed.

RESPONSE:

13. Please state the total of all expenditures, if any, that were included in Utility Plant in Service, in Construction Work in Progress, or in any other form in each of Docket Nos. 10-00189 or 12-00049 for or related to any 2014 Item C and D Mains, identifying the amount included in each Docket. Please provide relevant references to the record in Dockets No. 10-00189 and 12-00049 (by document, page, and line, if available).

RESPONSE:

14. Please identify the location, purpose, and total cost of each main project included in Line A – Mains, New (each of which is referred to as a “2014 Line A Project”) that TAWC sought to recover under the Economic Development Investment Rider (“EDI Rider”) in Docket No. 13-00130, listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was completed.

RESPONSE:

15. For each 2014 Line A Project for which TAWC sought recovery under the EDI Rider in Docket No. 13-00130, please identify with specificity the opportunities for economic benefit created in the area directly served by such Line A Project, identify the economic development investment and the number of jobs created in the area directly served by such Line A Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

16. Please identify the location, purpose, and total cost of each main project included in Line A – Mains, New (each of which is referred to as a “2015 Line A Project”) that TAWC seeks to recover under the EDI Rider in Docket No. 14-00121.

RESPONSE:

17. For each 2015 Line A Project for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121, please identify with specificity the opportunities for economic benefit to be created in the area directly served by each 2015 Line A Project, identify the economic development investment and the number of jobs to be created in the area directly served by such 2015 Line A Project, and identify the company(ies) that will make such investments and create such jobs.

RESPONSE:

18. Please identify each hydrant and valve installation included in Line E – Hydrants and Valves, New (each of which is referred to as a “2014 Line E Project”) that TAWC sought to recover under the EDI Rider in Docket No. 13-00130, listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was completed.

RESPONSE:

19. For each 2014 Line E Project for which TAWC sought recovery under the EDI Rider in Docket No. 13-00130, please identify with specificity the opportunities for economic benefit created in the area directly served by each 2014 Line E Project, identify the economic

development investment and the number of jobs created in the area directly served by such 2014 Line E Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

20. Please identify the location, purpose, and total cost of each hydrant and valve installation included in Line E – Hydrants and Valves, New (each of which is referred to as a “2015 Line E Project”) that TAWC seeks to recover under the EDI Rider in Docket No. 14-00121.

RESPONSE:

21. For each 2015 Line E Project for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121, please identify with specificity the opportunities for economic benefit to be created in the area directly served by each 2015 Line E Project, identify the economic development investment and the number of jobs to be created in the area directly served by such 2015 Line E Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

22. Please identify each new services installation included in Line G – Services, New (each of which is referred to as a “2014 Line G Project”) that TAWC sought to recover under the EDI

Rider in Docket No. 13-00130, listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was completed.

RESPONSE:

23. For each 2014 Line G Project for which TAWC sought recovery under the EDI Rider in Docket No. 13-00130, please identify with specificity the opportunities for economic benefit created in the area directly served by each 2014 Line G Project, identify the economic development investment and the number of jobs created in the area directly served by such 2014 Line G Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

24. Please identify the location, purpose, and total cost of each new services installation included in Line G – Services, New (each of which is referred to as a “2015 Line G Project”) that TAWC seeks recovery under the EDI Rider in Docket No. 14-00121.

RESPONSE:

25. For each 2015 Line G Project for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121, please identify with specificity the opportunities for economic benefit to be created in the area directly served by each 2015 Line G Project, identify the economic development investment and the number of jobs to be created in the area directly served by

such 2015 Line G Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

26. Please identify each meter and meter setting installation included in Line I – Meters and Meter Settings, New (each of which is referred to as a “2014 Line I Project”) that TAWC sought to recover under the EDI Rider in Docket No. 13-00130, listing for each a description of the project, the location of the project, total expenditures related to the project, and the date each was completed.

RESPONSE:

27. For each 2014 Line I Project for which TAWC sought recovery under the EDI Rider in Docket No. 13-00130, please identify with specificity the opportunities for economic benefit created in the area directly served by each 2014 Line I Project, identify the economic development investment and the number of jobs created in the area directly served by such 2014 Line I Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

28. Please identify the location, purpose, and total cost of each meter and meter setting installation included in Line I – Meters and Meter Settings, New (each of which is referred to

as a “2015 Line I Project”) that TAWC seeks to recover under the EDI Rider in Docket No. 14-00121.

RESPONSE:

29. For each 2015 Line I Project for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121, please identify with specificity the opportunities for economic benefit to be created in the area directly served by each 2015 Line I Project, identify the economic development investment and the number of jobs to be created in the area directly served by such Line I Project, and identify the company(ies) making such investments and creating such jobs.

RESPONSE:

30. Please identify with specificity the location, purpose, alternative fuel type, and total cost of each item of infrastructure and equipment included in Line O – Transportation Equipment (“2014 Line O Equipment”) for which TAWC sought recovery under the EDI Rider in Docket No. 13-00130, including, without limitation, its manufacturer(s), storage capacity, and fueling capabilities.

RESPONSE:

31. Please confirm that no amounts received by TAWC for 2014 Line O Equipment were actually expended in 2014.

RESPONSE:

32. Please identify with specificity the location, purpose, alternative fuel type, and total cost of each item of infrastructure and equipment included in Line O – Transportation Equipment (“2015 Line O Equipment”) for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121, including, without limitation, its manufacturer(s), storage capacity, and fueling capabilities.

RESPONSE:

33. Please confirm that all of the 2015 Line O Equipment for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121 are motor vehicles, and identify the types of and fuel to be used by each of the motor vehicles that TAWC intends to purchase.

RESPONSE:

34. Please identify the location, purpose, and total cost of each item included in Line Q – Process Plant and Equipment (each of which is referred to as a “2014 Line Q Item”) that TAWC sought to recover under the Safety Rider in Docket No. 13-00130 and specify the amount actually spent for each such 2014 Line Q Item in 2014 and the date it was placed into service.

RESPONSE:

35. Please identify the location, purpose, and total cost of each item included in Line Q – Process Plant and Equipment (each of which is referred to as a “2015 Line Q Item”) that TAWC seeks to recover under the Safety Rider in Docket No. 14-00121.

RESPONSE:

36. Please identify each 2014 Line Q Item and 2015 Line Q Item that was or is required by safety requirements imposed by the state or federal government, and produce all Documents that constitute, record, or relate to each such safety requirement and its imposition by the state or federal government.

RESPONSE:

37. Please identify each safety requirement imposed by the state or federal government that mandates TAWC’s Citico Process Wastewater Improvement Project, and please produce all Documents that constitute, record, or relate to each such safety requirement and its imposition by the state or federal government.

RESPONSE:

38. Please describe how each expense and cost related to (a) Citico 1B, (b) each 2015 Line B Project, and (c) the 2015 Lines C and D Mains, for which TAWC seeks recovery in Docket No. 14-00121, is in the public interest.

RESPONSE:

39. Please describe how each expense and cost related to (a) each 2015 Line A Project, (b) each 2015 Line E Project, (c) each 2015 Line G Project, (d) each 2015 Line I Project, and (e) each item of 2015 Line O Equipment, for which TAWC seeks recovery under the EDI Rider in Docket No. 14-00121, is in the public interest.

RESPONSE:

40. Please describe how each expense and cost related to (a) each 2015 Line Q Item and (b) the Citico Process Wastewater Improvement Project, for which TAWC seeks recovery under the Safety Rider in Docket No. 14-00121, is in the public interest.

RESPONSE:

Respectfully Submitted,

CITY OF CHATTANOOGA

By: Wade Hinton by FLH w/ permission

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CHAMBLISS, BAHNER & STOPHEL, P.C.

By: [Signature]

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CERTIFICATE OF SERVICE

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

Vance Broemel
Wayne Irvin
Office of the Tennessee Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202-0207

Melvin Malone
Valeria Gomez
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201

This 18th day of March, 2015.

By: _____

