



March 25, 2015

VIA ELECTRONIC FILING

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

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, TRA Docket No. 14-00121*

Dear Chairman Hilliard:

Attached for filing please find *Tennessee American Water Company's Response the City of Chattanooga's First Discovery Requests* in the above-captioned matter.

As required, an original of this filing, along with four (4) hard copies, will follow. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me or Melvin Malone.

Very truly yours,

BUTLER SNOW LLP

A handwritten signature in blue ink, appearing to read "Valeria E. Gomez", written over the printed name.

Valeria E. Gomez

clw
Attachments

cc: Deron Allen, President, Tennessee-American Water Company
Wayne Irvin, Assistant Attorney General, Consumer Advocate and Protection Division
Vance Broemel, Assistant Attorney General, Consumer Advocate and Protection Division
Frederick L. Hitchcock, Counsel for City of Chattanooga

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TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

In Docket No. 10-00189, Tennessee American included an investment project of Citico Phase 1A and Phase 1B identified as project 26020503. (Refer to the response to Item 13 of the TRA's First Data Request, Attachment TRA-010Q013-RATE BASE pages 1 and 2 of 62). The workpaper showed a prior balance of \$1,387,087.74, construction expenditures in 2010 of \$4,748,344.06, and construction expenditures in 2011 of \$2,490,248.00. This would total \$8,625,679 through the end of 2011, or the end of the attrition year.

In his testimony, John Watson identified Citico Phase 1A as a primary project in the case, and indicated it would be placed in-service in December 2010 for a total cost of \$6.7 million. The information in the case does not provide a specific breakdown of the difference between Phase 1A and Phase 1B. Assuming all of the 2011 expenditures are to be considered Phase 1B, then the amount in Docket 10-00189 regarding Citico Phase 1B in CWIP is \$2,49,248.00.

Also in the workpapers, \$5,301,305 for this same number project is placed in service in October, 2010 (refer to the response to Item 13 of the TRA's First Data Request, Attachment TRA-010Q013-RATE BASE page 12 of 62). There is no detail in the docket record or in the files that TAW has located to reconcile the balance.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

No other investments or expenses relating to Citico 1B were included in Docket No. 10-00189 other than identified in response to Item 1 of this same data request.

Tennessee American has reviewed the record in Docket No. 10-00189 and has identified the following descriptions of Citico project, either in entirety, Phase 1A, or Phase 1B:

- Direct Testimony of John Watson, page 5, lines 8 – 20 is a description of the Citico Phase 1A project
- Response to Item 93 of the Consumer Advocate and Protection Division Discover Request describes the reason for the delay and the distinction from the prior project
- Response to Item 53 of the Tennessee Regulatory Authority Discovery Request, Attachment 1 includes 102 pages of 2007 study and cost estimates of the Citico Phase 1 project before it was divided into smaller components
- Response to Item 3 of the City of Chattanooga Discovery Request, Supplemental Attachment filed December 13, 2010 lists Citico project costs from 2000 to 2010 as part of an overall schedule

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

\$170,000 was projected Construction Work in Progress to begin design for Citico 1B in Docket No. 12-00049, with \$180,000 in the calendar year 2013 in total. No amount was included in Utility Plant in Service in that Docket. Please refer to my direct testimony, page 31, lines 1 through 7. Also refer to the workpapers provided in response to Item 13 of the Tennessee Regulatory Authority's First Data Request, pages 921, 924 and 927 of 1236 which shows no amount in service, and pages 989, 992, 995, 998, and 1001 of 1236 which shows the cumulative CWIP balances by month.

The capital riders in Docket No. 13-00130 included the identification of \$3,000,000 for Citico Plant Improvements Phase 1B in 2014 as Construction Work in Progress; however, the Construction Work in Progress is not included in the calculation of the capital riders in 13-00130. Please refer to Direct Testimony of Brent O'Neill, Exhibit 2014 SCEP-BEO and workpaper 2014 SCEP In-Serviced. The final version of both the exhibit and workpaper were filed in Response to the Item 6 of the Tennessee Regulatory Authority's Third Discovery Request, dated January 31, 2014, Attachment 1 with AVG Impact change.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
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Responsible Witness: **Linda C. Bridwell**

Question:

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 IB 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:

It is impossible to identify any revenues collected by the Company as attributable to a single project identified under Construction Work in Progress in a prior case. In Docket No. 10-000189, Tennessee American identified a balance of Construction Work in Progress at the end of the test period of \$4,201,421 and a total rate base of \$125,472,973. The Tennessee Regulatory Authority authorized a Construction Work in Progress balance of \$2,681,318 with an overall total rate base of \$118,459,809. The Attrition Year in that Docket ended December 31, 2011. Tennessee American filed Docket No. 12-00049 with a test period ending December 31, 2011 with an identified total rate base of \$124,500,928.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

In Docket No. 14-00121, Tennessee American Water identified \$1,600,000 for the Citico 1B project in the 2015 Strategic Capital Expenditures Plan attached as Exhibit 2015 SCEP – BEO to Brent O’Neill’s Direct Testimony. No amount was included in Utility Plant in Service in this Docket, and Construction Work in Progress is not included in the calculation of the Capital Riders in this Docket.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

No expenditures for TAWC's wastewater treatment or handling facilities were included in Docket No. 10-00189 in Utility Plant in Service or in Construction Work in Progress. The project is listed as IP 2602-6 in the workpapers (Response to Item 13 of the TRA first discover request, Attachment TRA-01-13-Q013-RATE BASE, pages 1-4 of 62) as a future project with no capital expenditures in the test year or the attrition year.

No expenditures for TAWC's wastewater treatment or handling facilities were included in Docket No. 12-00049 in Utility Plant in Service. \$397,141 was projected Construction Work in Progress to begin Wastewater Treatment & Handling Improvements design in Docket No. 12-00049, with \$400,000 in 2013 in its entirety. Please see my testimony at Page 31, Lines 8-13. Also please refer to the workpapers provided in response to Item 13 of the Tennessee Regulatory Authority's First Data Request, pages 921, 924 and 927 of 1236 which shows no amount in service, and pages 989, 992, 995, 998, and 1001 of 1236 which shows the cumulative CWIP balances by month.

The capital riders in Docket No. 13-00130 included the identification of \$2,000,000 for Wastewater Treatment & Handling Improvements as Construction Work in Progress; however, the Construction Work in Progress is not included in the calculation of the capital riders in 13-00130. Please refer to Direct Testimony of Brent O'Neill, Exhibit 2014 SCEP-BEO and workpaper 2014 SCEP In-Serviced. The final version of both the exhibit and workpaper were filed in Response to the Item 6 of the Tennessee Regulatory Authority's Third Discovery Request, dated January 31, 2014, Attachment 1 with AVG Impact change.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

In Response to Question 1 of the First Discovery Request in Docket No. 13-00130, Tennessee American indicated that it anticipated completing 11 projects during the 2014 construction season. As indicated in the Direct Testimony of Brent O'Neill in Docket No. 14-00121 on pages 5 lines 23 and 24 and page 6 lines 1 through 6, Tennessee American delayed four (4) of these main replacement projects due to the need to shift resources and budget dollars to other lines. Tennessee American undertook the following projects during 2014:

- 1) Installed 751 lf of 4 inch ductile main along Glenn Avenue to replace 2 inch cast iron main at a cost of \$68,474 and was placed in service on May 20, 2014.
- 2) Installed 710 lf of 8 inch ductile main along Castle Avenue to replace 2 inch cast iron main at a cost of \$90,527 and was placed in service on August 15, 2014.
- 3) Installed 602 lf of 6 inch ductile main along 1st Avenue to replace 2 inch and 6 inch cast iron main at a cost of \$65,259 and was placed in service on August 12, 2014
- 4) Installed 638 lf of 6 inch ductile main along Crescent Park Drive to replace 2 inch cast iron main at a cost of \$58,521 and was placed in service on August 14, 2014.
- 5) Installed 1,633 lf of 6 inch ductile main along Clearview Road to replace 2 inch cast iron main at a cost of \$180,995 and was placed in service on March 4, 2014.
- 6) Installed 814 lf of 8 inch ductile main along Arlington Avenue to replace 2 inch cast iron main at a cost of \$97,573 and was place in service on July 10, 2014.
- 7) Installed 98 lf of 6 inch ductile main in Dayton Boulevard at Poole and Oakwood prior to paving of Dayton Boulevard at a cost of \$32,916 and was place in service on June 5, 2014.

- 8) Installed 1,211 lf of 12 inch ductile main along Silverdale to replace a 10" cast iron main at a cost of \$120,647 and was placed in service on August 18, 2014.
- 9) Installed 820 lf of 6 inch ductile main and 120 lf of 8 inch ductile iron main along Sunbeam Avenue at a cost of 114,433 and was place in service on October 29, 2014.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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

Response:

The following is the spend amount that occurred for each project listed in Question 7.

- 1) Glenn Avenue Main Replacement Project expenditures were \$13,417 during 2014.
- 2) Castle Avenue Main Replacement Project expenditures were \$90,432 during 2014.
- 3) 1st Avenue Main Replacement Project expenditures were \$63,485 during 2014.
- 4) Crescent Park Drive Main Replacement Project expenditures were \$58,425 during 2014.
- 5) Clearview Road Main Replacement Project expenditures were \$154,668 during 2014.
- 6) Arlington Avenue Main Replacement Project expenditures were \$97,592 during 2014.
- 7) Dayton Boulevard at Poole and Oakwood Main Replacement expenditures were \$32,943 during 2014.
- 8) Silverdale Main Replacement Project expenditures were \$115,543 during 2014.
- 9) Sunbeam Avenue Main Replacement Project expenditures were \$114,040.37 during 2014.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

The capital expenditures included in Item B Mains Replaced-Restored in Docket No. 14-00121 are for estimated projects to be completed in 2015 and as such the exact information requested is not available. However, as provided in the Direct Testimony of Brent O'Neill in Docket N. 14-0021 page 6 lines 10 to 36 and page 7 lines 1 to 11, TAWC expects to undertake the following projects:

- 1) Install 1,152 linear feet ("lf") of 6-inch ductile iron main along Standifer Road to replace 1.5-inch galvanized main at an estimated cost of \$81,000. This project was originally scheduled for 2014 but was delayed until 2015 due to emerging relocation projects during 2014.
- 2) Install 535 lf of 6-inch ductile iron main along Michigan Avenue to replace 2-inch cast iron main at an estimated cost of \$115,000. This project was originally scheduled for 2014 but was delayed until 2015 due to emerging relocation projects during 2014.
- 3) Install 842 lf of 8-inch, 522 lf of 6-inch and 125 lf of 4-inch ductile iron main along 35th Street Place to replace 2-inch galvanized and cast iron main at an estimated cost of \$180,000. This project was originally scheduled for 2014 but was delayed until 2015 due to emerging relocation projects during 2014.
- 4) Install 515 lf of 8-inch and 145 lf of 4-inch ductile iron main along W 47th Street to replace 2 inch cast iron main at an estimated cost of \$122,000. This project was originally scheduled for 2014 but was delayed until 2015 due to emerging relocation projects during 2014.
- 5) Install 1,800 lf of 6-inch ductile iron main along Signal View Street to replace 2-inch galvanized water main, at an estimated cost of \$196,000.

- 6) Install 2,720 lf of 6-inch ductile iron main along Centro and Center Streets to replace 1.5-inch galvanized and 2.25-inch cast iron water mains, at an estimated cost of \$236,000.
- 7) Install 800 lf of 6-inch ductile iron main along Hanover Street to replace 2-inch galvanized water mains, at an estimated cost of \$96,000.
- 8) Install 1,700 lf of 6-inch ductile iron main along Semi Circle Drive to replace 2-inch cast iron and 1.25-inch galvanized water mains, at an estimated cost of \$204,000.
- 9) Install 1,800 lf of 6-inch ductile iron main along Fairy Trail to replace 2-inch galvanized water mains, at an estimated cost of \$216,000.
- 10) Install 325 lf of 4-inch ductile iron main along Pine View Lane to replace 2.25-inch galvanized water main at an estimated cost of \$54,000.

As reported in the March 10, 2015 Utility Coordination Meeting with the City of Chattanooga, only two of the above projects are nearing completion, Standifer Road and Michigan Avenue. The remaining projects are expected to be completed during the remainder of the year. TAWC also reported during the March 10, 2015 meeting that the following projects had been added to the list of projects that the company anticipates to construct during 2015:

- 11) Install 1,100 lf of 8 inch ductile iron main along Nurick Drive. Expected to start during Third Quarter.
- 12) Install 995 lf of 6 inch ductile iron main along Francis Street – Expected to start by Third Quarter.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

In Docket Nos. 10-00189 and 12-00049, specific projects under Item B were not identified. Both Dockets had an Attrition Year that ended prior to 2014. Therefore, none of the 2014 Item B Projects or 2015 Item B Projects were included in Utility Plant in Service or in Construction Work in Progress, or in any other manner in those Dockets.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

2014 Item C-Mains-Unscheduled was a total of \$800,000 and 2014 Item D- Mains – Relocated were \$250,000 in Docket No. 13-00130. Please refer to the Exhibit 2014 SCEP – BEO attached to Brent O'Neill's testimony and workpaper 2014 SCEP In-Serviced. The final version of both were filed in response to Item 6 of the Tennessee Regulatory Authority's Third Discovery Request, dated January 31, 2014 as Attachment 1 with AVG Impact Change.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

During 2014 TAWC undertook thirty seven (37) projects under the Item C – Unscheduled Mains involving the replacement or restoration of existing mains that was caused by unexpected breaks of mains during 2014. The cost for material and installation of unscheduled main are not independently tracked by separate projects but are grouped into what the company calls a blanket work order that remains open during the entire year collecting the costs. The costs indicated below are based mostly on the length and size of main replaced during the unscheduled event. The following locations are where these main breaks occurred and caused an unscheduled replacement of a section of main:

- | | |
|---|---|
| 1) 3741 Dorris Street (\$7,756) – 3/14/14 | 20) 1804 Madison Avenue (\$19,389) - 4/22/14 |
| 2) 2605 E 30th Street (\$7,756) - 7/17/14 | 21) 801 Belvoir Avenue (\$19,389) |
| 3) Revere Circle (\$7,756)- 11/8/14 | 22) 2407 Latta Street (\$23,267) - 4/08/14 |
| 4) 35 Hollywood Ave (\$10,393) | 23) 3502 Ringgold Road (\$23,267) - 4/22/14 |
| 5) 2807 E 47th Street (\$10,393) - 4/08/14 | 24) 900 Foster Street (\$31,022) - 5/28/14 |
| 6) 403 Sequoia Drive (\$10,393) - 4/23/14 | 25) 3723 Anderson Avenue (\$31,022) - 6/25/14 |
| 7) 3104 Carlton Avenue (\$10,393) - 7/18/14 | 26) 443 Roberts Street (\$33,649) - 6/09/14 |
| 8) 3010 12 th Avenue (\$10,393) - 7/06/14 | 27) 761 Lanoir Circle (\$33,649) - 7/07/14 |
| 9) 3612 Tanaka Trace (\$10,393) - 8/11/14 | 28) 3713 Pirola Street (\$34,900) - 9/23/14 |
| 10) 13th Street (\$10,393) | 29) 1607 Arlington (\$38,552) - 4/15/14 |
| 11) 1504 Fruitland Drive (\$10,393) - 5/29/14 | 30) 43rd St @ 7th Ave (\$40,707) - 7/07/14 |
| 12) 902 W Pine (\$15,511) - 4/10/14 | 31) 6836 McCutcheon Road (\$42,061) - 7/03/14 |
| 13) 2606 Andrews Street (\$15,511) | 32) 731 Lanoir Street (\$42,061) - 7/01/14 |
| 14) 600 W. 42nd Street (\$15,511) - 6/25/14 | 33) 1814 Madison Ave (\$42,061) - 4/22/14 |
| 15) 619 E Brow Road (\$15,511) – 8/07/14 | 34) 215 Peak Street (\$42,656) - 3/27/14 |
| 16) 3109 E 34th Street (\$15,511) – 8/05/14 | 35) 300 E 38th Street (\$61,060) - 7/07/14 |
| 17) 4505 Caine Avenue (\$15,511) - 7/08/14 | 36) 3727 Mission View (\$73,678) - 6/24/14 |
| 18) 4100 Milinda Street (\$19,389) | 37) Memorial Drive 16" Main (\$18,921) -8/18/14 |
| 19) 364 Carnation Street (\$19,389) - 6/06/14 | |

During 2014 TAWC undertook three (3) main relocations projects under Item D Main – Relocated. These projects are as follows:

- 1) Bonny Oaks/ Volkswagen Drive Main Relocation due to the Tennessee Department of Transportation widening project. Project involved the relocation of 839 lf of 12 inch ductile main to make room for an additional lane at a cost of \$181,048 and was placed in service during December 2014.
- 2) Relocation of 6 inch and 4 inch ductile main with 140 lf of 6 inch ductile main and 109 lf of 4 inch ductile main along Stringer Street due to Tennessee Department of Transportation storm drainage work. The project cost was \$37,490 and was placed in service during February 2014.
- 3) Relocation of a 10 inch cast iron main with 47 lf of 12 inch ductile main along Wisdom Street due to a conflict with a proposed storm structure. The project cost was \$17,818 and was placed in service during December 2014.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

In Docket Nos. 10-00189 and 12-00049, specific projects under Item C and Item D were not identified. Both Dockets had an Attrition Year that ended prior to 2014. Therefore, none of the 2014 Item C or 2014 Item D Projects were included in Utility Plant in Service or in Construction Work in Progress, or in any other manner in those Dockets.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

TAWC undertook one main extension under Item A – Mains New for 2014. The project was the Olan Mills Extension for the development of the Coca-Cola Bottling Company Distribution Center. The project involved the addition of 1,667 lf of 12 inch ductile main. The project cost was \$105,190.63 and the project was placed in service during January 2015.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As indicated in response to Question 14 of this same discovery request, TAWC undertook the Olan Mills Extension for the development of the Coca-Cola Bottling Company Distribution Center. As reported in an article posted by the Area Development Online News Desk on 04/28/2014, Chattanooga Coca-Cola Bottling Company is building a \$62 million, state-of-the-art distribution and sales facility on the former Olan Mills site. With the investment, Coca-Cola Bottling plans to create 43 new jobs and retain 270 existing jobs that would have been moved elsewhere without the new facility. According to the article, the City of Chattanooga applauded the company's decision and would work closely with the company to support their timetable. TAWC worked with Coca-Cola and the City to ensure that the redevelopment of the area was supported by the new main installed under Item A – New Mains.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As in indicated in the Direct Testimony of Brent O'Neill regarding Docket No. 14-00121 on page 12 lines 1 and 5, TAWC plans to spend approximately \$95,000 on various size water mains within distribution system that are associated with eliminating dead ends or upsizing of developer initiated extensions. At this time TAWC has not identified any projects for 2015 since the company has not been made aware of any opportunities. TAWC based its expected spend within Line A on the 2012 investment amount of \$116,244. This is lower than 2013 spending of \$230,419. Projecting into 2015, TAWC anticipates that 2012 spending levels offer a more relevant comparison.

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DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

To date, no economic development opportunities have been reported to TAWC and as such no projects have been identified during the first part of 2015. However, this line item includes new water mains, valves, and other appurtenances that are necessary to perform the work that is funded by the TAWC, including upsizing of developer initiated extensions; Company initiated and funded new mains that are not related to immediate growth but support future growth, such as new mains that eliminate existing dead ends or provide new transmission capacity; and new customer initiated extensions in accordance with tariffs that may include some customer contribution (customer funded portion under Developer Initiated Projects). This item may also include new mains that parallel existing mains to increase transmission capacity, provide reliability, increase fire protection or establish an additional pressure gradient. Similar to the Coca Cola project, Line A is utilized to foster economic development through new mains in place for new customers or to address reliability or additional demands.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

During 2014, TAWC installed three (3) new valves at the following locations:

- 1) Install an 8-inch valve at Alstrom Windtower (\$10,605) placed in service on June 23, 2014.
- 2) Install an 8-inch valve at Moccasin Bend Road (\$10,316) placed in service on June 30, 2014.
- 3) Install an 8-inch valve at 4146 S. Creek Road (\$4,336) placed in service by December 2014.

During 2014, TAWC installed two (2) new hydrants at the following locations:

- 1) 1121 Healing Springs Road (\$10,815) placed in service by December 2014.
- 2) Chickamauga Avenue (\$7,765) placed in service on November 17, 2014.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

While the new main projects associated with Line A – New Mains can be directly attributed to a specific project or request for increased service, the projects associated with Line E have a broader impact on the overall development of an area. At this time TAWC is not aware of any statistics that are available to provide the direct correlation between the creation of jobs and the work associated with Line E Projects. TAWC believes that investment in placing new valves and hydrants within the distribution system benefits the community being served by ensuring that the distribution system is reliable and can meet the demands of a growing area. The United States Environmental Protection Agency's has indicated that "(m)aking these investments in water infrastructure has immense returns for communities. Clean, reliable water brings not only public health and environmental benefits but it also fuels the economy, creates jobs and increases the quality of life in communities." (<http://water.epa.gov/infrastructure/waterfinancecenter.cfm>)

New fire hydrants assist with the communities to maintain or improve on the communities Insurance Service Organization Public Protection Classification. As indicated within the Fire Rescue Publication January 2015 Issue, "...economic development agencies, chambers of commerce, and individual commercial building owners are recognizing the appeal of doing business in a well-protected, well-equipped community and are being proactive in their communities' risk reduction. (<http://www.firefighternation.com/article/firefighter-safety/iso-public-protection-classification>)

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As indicated in the Direct Testimony of Brent O'Neill for Docket No. 14-00121 on page 12 lines 11 and 18, TAWC plans to spend approximately \$48,000 on a combination of 21 new hydrants and valves. At this time TAWC has not identified any projects for 2015. This investment plan item includes the installation of new hydrants, including hydrant assemblies and valves that are installed on existing mains or installed in conjunction with main extension projects, which are company funded. This item generally includes all public hydrants. This item is used to foster economic development by providing new fire protection or enhancing fire protection in currently served areas beyond what is created under CIAC. Improved infrastructure in existing older service areas, including fire protection, is a key to redevelopment in economic growth. TAWC based its expected spend on the previous spend within this line for the past several years. In addition, TAWC is currently working with the City of Chattanooga Fire Department to identify locations for new hydrants that the department believes will assist them in responding to emergencies.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

To date, no economic development opportunities have been reported to TAWC and as such no projects have been identified during the first part of 2015. In addition, the location of new fire hydrants being requested by the City of Chattanooga Fire Department has not been communicated at this time. In general, this investment plan item includes the installation of new hydrants, including hydrant assemblies and valves that are installed on existing mains or installed in conjunction with main extension projects, which are company funded. This item generally includes all public hydrants. This item is used to foster economic development by providing new fire protection or enhancing fire protection in currently served areas beyond what is created under CIAC. Improved infrastructure in existing older service areas, including fire protection, is a key to redevelopment in economic growth.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

TAWC installed 535 new services during 2014. The cost for material and installation of these services are not independently tracked by separate projects but are grouped by the size of service installed. Please see TAW_R_COCDR1_NUM022_Attachment_032515 that provides a listing of each address and installation date for each new service.

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
			Month	Year
90022589	1807 Terry Lynn-ELLIS	1/27/2014	1	2014
90029077	825 Oak-BAGE	1/13/2014	1	2014
90031379	108 Eastview Dr-HOLLAND	1/29/2014	1	2014
90038787	7017 Arbor Leaf-FAGAN/CUMBERLAND	1/29/2014	1	2014
90040259	2125 Merlin Dr-ROWLAND	1/15/2014	1	2014
90040865	6865 VILLAGE LAKE CIR Lot25-DOWNSOUTH	1/21/2014	1	2014
90040876	7301 HUNTLEY LN-DOWNSOUTH (LO)	1/15/2014	1	2014
90040877	7309 HUNTLEY LN-DOWNSOUTH (LO)	1/15/2014	1	2014
90040878	7317 HUNTLEY LN-DOWNSOUTH (LO)	1/15/2014	1	2014
90040879	7325 HUNTLEY LN-DOWNSOUTH (LO)	1/15/2014	1	2014
90041531	3105 Waterfront Dr Lot #33-MILLER	1/29/2014	1	2014
90046691	4219 Cummings Hwy-MANNING	1/22/2014	1	2014
90047690	7646 Lee Hwy-SAMER	1/31/2014	1	2014
90047692	376 Harper St-COLLIER CONSTR	1/17/2014	1	2014
90047694	388 Harper St-COLLIER CONSTR	1/17/2014	1	2014
90047695	394 Harper St-COLLIER CONSTR	1/16/2014	1	2014
90047696	400 Harper St-COLLIER CONSTR	1/16/2014	1	2014
90049743	2841 Fern Leaf-MCCOY HOMES	1/6/2014	1	2014
90059416	766 Black Creek	1/22/2014	1	2014
90059961	Scruggs Rd Catoosa County Meters	1/23/2014	1	2014
90059962	Scruggs Rd #2 Catoosa County Meters	1/23/2014	1	2014
90061922	1807 Terry Lynn	1/28/2014	1	2014
90061924	3105 Waterfront Dr	1/28/2014	1	2014
90061927	108 Eastview Dr	1/28/2014	1	2014
90038613	2306 Ashmore- Ave	2/3/2014	2	2014
90040872	642 E 19TH ST-LOT 26	2/6/2014	2	2014
90047698	493 Wayne Ave-Mosey	2/3/2014	2	2014
90053038	1948 Rossville Ave	2/3/2014	2	2014
90053039	502 E Brow Rd-	2/25/2014	2	2014
90055468	1325 Reserve Way-ROBERTSON	2/4/2014	2	2014
90061189	4 Rivervista Dr-PUTNUM relocation	2/3/2014	2	2014
90061190	1308 Gillespie Rd	2/6/2014	2	2014
90061196	11 Willingham Ln, Lookout Mtn-	2/19/2014	2	2014
90062358	1825 Gunbarrel/3RD Floor -	2/10/2014	2	2014
90062359	1825 Gunbarrel/4TH Floor -	2/10/2014	2	2014
90062446	147 Baylor school Rd	2/21/2014	2	2014
90062447	318 Keith St- RES - Tower Constr	2/7/2014	2	2014
90062449	4116 South Creek	2/27/2014	2	2014
90062450	849 Graysville Rd-	2/3/2014	2	2014
90062680	7400 Standifer Gap Rd/BLDG#2	2/10/2014	2	2014
90066120	1951 Notting Hill-GOODWIN-	2/5/2014	2	2014
90066121	640 Wilshire Way- -	2/10/2014	2	2014
90066122	642 Wilshire Way--	2/10/2014	2	2014
90066123	646 Wilshire Way--	2/10/2014	2	2014
90066539	814 Waterthrush Ln-ROWLAND	2/7/2014	2	2014
90066901	745 Shearer Cove Rd-Jensen-	2/7/2014	2	2014
90066902	2911 Braly Pl-Gargano-	2/12/2014	2	2014
90066903	2619 Boyce Street Apt A-	2/18/2014	2	2014
90066904	832 Waterthrush Ln-	2/12/2014	2	2014
90066905	7715 Shallowford Rd-E TENN-	2/18/2014	2	2014
90066906	7715 Shallowford Rd-E TENN-	2/18/2014	2	2014
90066990	2911 Braly Pl - Gargano	2/18/2014	2	2014
90068985	642 E 19th-	2/17/2014	2	2014
90068986	644 Wilshire Way-*	2/14/2014	2	2014
90068987	638 E 19th St-	2/15/2014	2	2014
90068988	1956 Rossville Ave	2/15/2014	2	2014
90068990	1944 Rossville Ave-RTB Holdings	2/14/2014	2	2014
90069834	522 Isbill Rd -MIZELL	2/18/2014	2	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90069835	422 Hudson St-PHILLIPS	2/18/2014	2	2014
90070752	2840 Ridgemont Dr	2/22/2014	2	2014
90070753	Alstom Riverside Dr	2/26/2014	2	2014
90071897	1325 Reserve Way Service	2/26/2014	2	2014
90047697	1113 E DALLAS-PORTERA	3/6/2014	3	2014
90062448	1012 E Dallas Rd-/MTR-O'KEEFE	3/5/2014	3	2014
90066907	1989 Jenkins Rd- EDDINS-	3/6/2014	3	2014
90068989	1952 Rossville Ave	3/5/2014	3	2014
90072816	327 Hogan APT D-HICKS	3/11/2014	3	2014
90073790	1605 Olive Street	3/6/2014	3	2014
90073976	717 Liberty St-COLE	3/10/2014	3	2014
90073978	7320 Bonny Oaks-SILVERDALE	3/5/2014	3	2014
90074279	116 S. Forest Ave.-Morris	3/20/2014	3	2014
90075675	7402 Twin Brook-	3/17/2014	3	2014
90075841	146 E Manning-CRONAN	3/14/2014	3	2014
90075842	146 E Manning-CRONAN DOM WTR	3/25/2014	3	2014
90076061	1832 Chestnut-	3/17/2014	3	2014
90076892	3642 Crestline Dr-	3/18/2014	3	2014
90076893	3642 CrestlinE	3/18/2014	3	2014
90076894	2770 Enclave Bay-DEXTER WHT-	3/21/2014	3	2014
90076895	2770 Enclave Bay-DEXTER WHT-	3/13/2014	3	2014
90076896	2554 Enclave Bay-DEXTER WHT- RES	3/21/2014	3	2014
90076897	1578 Westover Ln-DEXTER WHT RES	3/13/2014	3	2014
90076898	7476 Noah Reid-	3/25/2014	3	2014
90077420	307 E 8th #27 LAUNDRY-PAPA PROP(COMPLET)	3/25/2014	3	2014
90077800	901 Wall St-ADAMSON	3/17/2014	3	2014
90077801	741 Shearer Cove-BENNETT CONSTR	3/17/2014	3	2014
90077802	1223 Ft Stephenson Oval-NELSON	3/20/2014	3	2014
90078675	2480 Waterhaven-MERCER	3/21/2014	3	2014
90078676	2536 Waterhaven-Mercer	3/28/2014	3	2014
90078677	2815 Waterhaven-Mercer	3/21/2014	3	2014
90078678	2751 Waterhaven-Mercer TA	3/28/2014	3	2014
90078679	30 Glovers Knoll-POSEY	3/20/2014	3	2014
90078842	2025 Sharp St-INNOVATION CONSTR	3/26/2014	3	2014
90078844	2019 Sharp St-INNOVATION CONSTR	3/26/2014	3	2014
90078846	1620 Edgewood Cir-JACKSON	3/26/2014	3	2014
90078849	2554 Enclave Bay Dr-DEXTER WHT	3/27/2014	3	2014
90078941	8300 Grinder Creek-WOODS RES	3/28/2014	3	2014
90078943	1714 Long-HOLLAND -	3/21/2014	3	2014
90078948	254 Velma St-WISE (RETAIL SHOP)	3/20/2014	3	2014
90078951	1705 Long-HOLLAND -	3/27/2014	3	2014
90081046	1578 Westover Ln-DEX WHT	3/31/2014	3	2014
90081049	3351 Hughes Ave	3/28/2014	3	2014
90073698	327 Hogan APT D-HICKS res	4/23/2014	4	2014
90075559	Notification Creation	4/10/2014	4	2014
90078671	556 Kestrel Lane-HILL HAVEN HOLDINGS	4/1/2014	4	2014
90078673	1111-B Gunbarrel-REAR-CHARMELUS	4/29/2014	4	2014
90078841	208 FRANKLIN ST-	4/3/2014	4	2014
90078845	1611 Five Springs-EPPERSON	4/21/2014	4	2014
90078847	110 Augusta Dr #A-2ND MTR	4/3/2014	4	2014
90078848	555 Kestrel Ln-WORLEY	4/1/2014	4	2014
90078946	754 Black Creek Dr-GROVES RES	4/1/2014	4	2014
90078947	270 Velma St-WISE RETAIL SHOP	4/2/2014	4	2014
90078949	250 Velma St-WISE COM	4/2/2014	4	2014
90078950	103 Cheorkee Ste A-	4/2/2014	4	2014
90080056	1443 Lakeview	4/21/2014	4	2014
90080137	425 W Bell-ADDISON	4/14/2014	4	2014
90080138	222 Fleetwood,Lookout Mtn-	4/16/2014	4	2014
90080139	6713 Brianna Way-SLAYTON	4/9/2014	4	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90080480	4308 Nestledown Ct-ROWLAND RES	4/1/2014	4	2014
90080481	4023 Nestledown CT-Lot9-ROWLAND	4/1/2014	4	2014
90080482	4315 Nestledown CT-Lot10-ROWLAND	4/1/2014	4	2014
90080483	701 Black Creek Dr-L216-ROWLAND	4/16/2014	4	2014
90080484	820 River Gorge Dr-ROWLAND	4/14/2014	4	2014
90080606	2315 Center St-FLANAGAN (SUB DIV LOT)	4/17/2014	4	2014
90080607	7605 Hamilton Park Dr-MCLELLAN COMM	4/9/2014	4	2014
90080609	1020 E Dallas Rd-ROOKS	4/10/2014	4	2014
90080820	7420 Bonny Oaks-SPEEDWAY7115	4/9/2014	4	2014
90080821	3030 Igou Crossing Dr-BURT	4/23/2014	4	2014
90080822	3042 Igou Crossing Dr-BURT	4/2/2014	4	2014
90080823	7990 Rhodes Farm Way	4/7/2014	4	2014
90081047	3331 Hughes Ave	4/14/2014	4	2014
90081048	3341 Hughes Ave	4/14/2014	4	2014
90081050	3361 Hughes Ave	4/14/2014	4	2014
90081051	221 STEPHENSON AVE-DEXWHITE	4/2/2014	4	2014
90083234	3853 Conahaney Trl	4/16/2014	4	2014
90083421	7372 Huntley Ln-DOWN SO	4/9/2014	4	2014
90083515	905 Avon Pl-MCCOY	4/21/2014	4	2014
90083620	260 Velma-WISE RETAIL SHOP	4/9/2014	4	2014
90083623	4909 Saint Elmo-CITY OF CHATT	4/17/2014	4	2014
90084116	302 1/2 Davis St - DUPLEX	4/30/2014	4	2014
90084117	304 1/2 Davis St-DUPLEX-	4/30/2014	4	2014
90084118	4597Tarpon Trl	4/28/2014	4	2014
90084200	102 W 19th-	4/14/2014	4	2014
90084202	110 W 19th	4/14/2014	4	2014
90084203	114 W 19th	4/30/2014	4	2014
90084204	120 W 19th	4/14/2014	4	2014
90084206	128 W 19th	4/14/2014	4	2014
90084207	132 W 19th	4/30/2014	4	2014
90085510	837 WATERTHRUSH LN-STURMAN **	4/15/2014	4	2014
90087749	7831 Lee Hwy-DILALRD/NABORS -	4/24/2014	4	2014
90087752	701 Boylston St-MORRISON	4/22/2014	4	2014
90088080	6839 McCutcheon	4/24/2014	4	2014
90088258	860 River Gorge-HAGAMAN	4/24/2014	4	2014
90088633	6454 Laramie Cir-DREAMTECH	4/29/2014	4	2014
90088634	6450 Laramie-DREAMTECH	4/29/2014	4	2014
90088636	2783 Amsterdam-BELL DEV-	4/28/2014	4	2014
90088638	2795 Amsterdam-BELL DEV-	4/28/2014	4	2014
90088639	2801 Amsterdam-BELL DEV-	4/30/2014	4	2014
90088705	2319 Waterhaven-RLP CONSTR-	4/30/2014	4	2014
90088706	2107 Gunbarrel-HAM CORNER CMS	4/30/2014	4	2014
90089804	212 Blackwell Farm Rd-GOLDSTEIN	4/30/2014	4	2014
90097953	1347 Quiet Pond Dr-MARSH CONST	5/30/2014	5	2014
90097952	106 Eastview-ESTES(Holland)	5/30/2014	5	2014
90096689	861 Waterthrush(prev.789)-GARDNER	5/27/2014	5	2014
90096688	852 Water Thrush-THOMPSON	5/27/2014	5	2014
90096664	119 Mitchell Dr.-BROWN-	5/28/2014	5	2014
90096071	6713 Brianna Way FS	5/20/2014	5	2014
90095826	399 Thompson St-SHVED-	5/28/2014	5	2014
90095825	393 Thompson-SHVED-	5/28/2014	5	2014
90075558	19 Trewwhitt-DARBY, SR	5/19/2014	5	2014
90078843	1610 Berkley Cir-PEARSON CONSTR	5/5/2014	5	2014
90078944	1710 Long-HOLLAND -	5/21/2014	5	2014
90083235	634 B Runyan	5/13/2014	5	2014
90083518	1111 Gunbarrel Rd B - CHARMEUS	5/19/2014	5	2014
90083622	1734 Dayton Blvd-	5/1/2014	5	2014
90084201	106 W 19th	5/21/2014	5	2014
90084208	4226 Ringgold Rd-SPEEDWAY7151-FRITZ	5/1/2014	5	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90084211	124 W 19th-	5/1/2014	5	2014
90087879	1439 Market St-JOHNSON COMM	5/9/2014	5	2014
90088635	2081 PetersoN-DON WALKER CONSTR	5/20/2014	5	2014
90088700	1118 Valentine Cir-	5/2/2014	5	2014
90088701	1120 Valentine(constr)	5/2/2014	5	2014
90088703	814 Fairview-RLP- ONLY	5/21/2014	5	2014
90088704	816 Fairview-RLP- ONLY	5/14/2014	5	2014
90088707	2909 Folts Dr-SAWYER	5/14/2014	5	2014
90089501	501 Memorial Drive	5/6/2014	5	2014
90089715	Alstom on Ash St	5/13/2014	5	2014
90089802	216 Blackwell Farm Rd-GOLDSTEIN	5/6/2014	5	2014
90089803	218 Blackwell Farm Rd-GOLDSTEIN	5/6/2014	5	2014
90089805	214 Blackwell Farm Rd-GOLDSTEIN	5/6/2014	5	2014
90089806	6 Riverside Ln-	5/21/2014	5	2014
90089807	121 E 3rd-MOON	5/21/2014	5	2014
90089808	117 E 3rd-MOON	5/21/2014	5	2014
90089809	113 E 3rd-MOON	5/6/2014	5	2014
90089810	999 E M L King Blvd-RLP CONSTR-	5/21/2014	5	2014
90089811	1001 E M L King Blvd-RLP-	5/21/2014	5	2014
90089812	1041 Dartmouth St-HARRIS	5/21/2014	5	2014
90089813	900 Vine St/Read House Condos	5/21/2014	5	2014
90089814	501 Crewdson-SPAULDING/EMBARK -	5/16/2014	5	2014
90089815	1939 Nottingham-GOODWIN-	5/21/2014	5	2014
90089816	1945 Nottingham-GOODWIN-	5/21/2014	5	2014
90090146	6121 Lee Hwy-SPEEDWAY	5/13/2014	5	2014
90090147	402 Forest Ave-DEXWHT--DOMESTIC	5/1/2014	5	2014
90090148	2906 Silverdale Rd-TS CONSTR-	5/20/2014	5	2014
90090311	6101 Bermuda-ANDERSON-	5/1/2014	5	2014
90090312	6100 Bermuda-ANDERSON-	5/22/2014	5	2014
90092118	102 Lawn St-WALDREP	5/12/2014	5	2014
90092119	100 Lawn St-WALDREP	5/12/2014	5	2014
90092321	2308 Ashmore Ave-HGH	5/16/2014	5	2014
90092323	2312 Ashmore Ave-HGH	5/12/2014	5	2014
90092324	2316 Ashmore Ave-HGH	5/27/2014	5	2014
90092325	2320 Ashmore Ave-HGH	5/21/2014	5	2014
90092327	104 W 17TH-HEADRICK	5/27/2014	5	2014
90092328	116 w 17TH-HEADRICK	5/27/2014	5	2014
90092329	128 w 17TH-HEADRICK	5/27/2014	5	2014
90092330	400 N Market-BENNING/PUBLIX-	5/19/2014	5	2014
90092331	2102 Milne St-NEWELL-	5/27/2014	5	2014
90092332	207 Delmont St-FOREST UNITED-	5/27/2014	5	2014
90092333	229 Delmont St-FOREST UNITED-	5/27/2014	5	2014
90093228	6839 McCutcheon-BRIDGEWAY APTS	5/13/2014	5	2014
90094106	400 N Market-PUBLIX-(1of2)	5/20/2014	5	2014
90094108	400 N Market-RETAIL@PUBLIX-(2of2)	5/20/2014	5	2014
90094109	1555 Burns Ave-ANDERSON CONSTR	5/20/2014	5	2014
90094110	2530 Enclave Bay-MILLER BLDG	5/16/2014	5	2014
90094111	2530 Enclave Bay-MILLER BLDG	5/16/2014	5	2014
90094112	1100 Hixson Pk-Ste100	5/19/2014	5	2014
90094113	1098 Chamberlain-KNOX	5/29/2014	5	2014
90094586	2854 Firethorne Ln-Mellencamp-	5/15/2014	5	2014
90094588	831 Dry Branch---	5/15/2014	5	2014
90094677	1224 Bridgeview Dr--	5/15/2014	5	2014
90095424	6121 Lee Hwy Speedway	5/20/2014	5	2014
90095439	578 Hillpointe Ln-DEXWHT-	5/23/2014	5	2014
90095820	578 Hillpointe Ln-DEXWHT-	5/23/2014	5	2014
90095821	2674 Enclave Bay-SMITH- DOM	5/23/2014	5	2014
90095822	1404 Cinderella-Lookout Mtn	5/28/2014	5	2014
90095824	405 Thompson St-SHVED	5/28/2014	5	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90002321	636 Wilshire Way Lot VG8B	6/4/2014	6	2014
90107320	168 W Hills Dr	6/27/2014	6	2014
90106605	1934 Jefferson-RTB/WOMACK -	6/26/2014	6	2014
90106352	4012 Obar Dr, -	6/25/2014	6	2014
90106351	1401 Needle Rush Ln, -	6/25/2014	6	2014
90106350	7250 Noah Reid-	6/25/2014	6	2014
90106348	7266 Noah Reid-	6/25/2014	6	2014
90105708	703 Boylston St--	6/24/2014	6	2014
90104818	901 Albany St-PATY-	6/24/2014	6	2014
90102789	703 Boylston St-	6/23/2014	6	2014
90102786	168 West Hills Dr-PNC Construt.-	6/12/2014	6	2014
90102785	156 West Hills Dr-PNC Const-	6/19/2014	6	2014
90102781	2734 Waterhaven Dr-	6/26/2014	6	2014
90101153	2674 Enclave Bay Dr.--	6/6/2014	6	2014
90101060	3131 Waterfront Dr-Matt Mayfield-	6/18/2014	6	2014
90100930	101 McFardland Rd-Lkmtn-Erlanger Health	6/17/2014	6	2014
90100759	3150 Plaza Circle	6/19/2014	6	2014
90100192	2460 Waterhaven-SMHENRY- RES	6/12/2014	6	2014
90098878	330 Whitehall Rd	6/6/2014	6	2014
90098855	1819 Moirris Hill-PICKET HOMES-	6/13/2014	6	2014
90098854	3900 HEARTHSTONE	6/5/2014	6	2014
90097842	2611 Riverside DR-Davis-	6/23/2014	6	2014
90096482	1157 Highland-RICHARDSON	6/3/2014	6	2014
90096481	110 Augusta-LOOKOUT MTN-BROCK	6/16/2014	6	2014
90095827	1312 Spears Ave	6/3/2014	6	2014
90088702	1726 Gunbarrel-WILKINS RESEARCH-	6/3/2014	6	2014
90090310	800 Vine St-POSTON	6/16/2014	6	2014
90092320	7455 Commons-EDMONDSON	6/4/2014	6	2014
90094114	801 Oak St-UTC-	6/5/2014	6	2014
90094587	2848 Firethorne Ln-Mellencamp-	6/5/2014	6	2014
90095438	125 Fleetwood Dr/LOOKOUT MTN-COLE	6/6/2014	6	2014
90117071	1825 Gunbarrel Rd --	7/31/2014	7	2014
90116766	1968 Rossville Ave-	7/31/2014	7	2014
90116765	1960 Rossville Ave-	7/31/2014	7	2014
90116764	3037 Enclave Bay Dr.--	7/31/2014	7	2014
90116643	529 Colby St-	7/30/2014	7	2014
90116459	2328 Ashmore Ave-	7/29/2014	7	2014
90116456	1146 Hidden Creek Dr--	7/29/2014	7	2014
90116455	729 Shearer Cove Rd-	7/29/2014	7	2014
90115120	634 E 19th St-	7/24/2014	7	2014
90114848	555 Kestrel Ln--	7/23/2014	7	2014
90114357	7318 Huntley Ln-	7/25/2014	7	2014
90114356	7326 Huntley Ln-	7/25/2014	7	2014
90114355	7332 Huntley Ln-	7/31/2014	7	2014
90022584	1228 Cumberland Rd-BICKERSTAFF	7/22/2014	7	2014
90114354	7340 Huntley Ln-	7/31/2014	7	2014
90114119	1080 Reunion Dr--	7/22/2014	7	2014
90113796	6446 Laramie Cir-	7/31/2014	7	2014
90113795	6438 Laramie Cir-	7/30/2014	7	2014
90113794	6854 Robin Dr-	7/21/2014	7	2014
90113793	6858 Robin Dr- 5/8	7/31/2014	7	2014
90113792	733 Shearer Cove Rd-	7/21/2014	7	2014
90113759	2002 Belleau Village Lane-	7/23/2014	7	2014
90113758	1996 Belleau Village Lane-	7/23/2014	7	2014
90113757	1990 Belleau Village Lane-	7/23/2014	7	2014
90113756	1984 Belleau Village Lane-	7/23/2014	7	2014
90113755	1806 Gunbarrel Rd-	7/24/2014	7	2014
90113745	528 Crewdson Street	7/23/2014	7	2014
90113184	3639 CRESTLINE DR - -	7/18/2014	7	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90113183	1381 Bridgeview Dr-	7/25/2014	7	2014
90113077	116 S Forrest Ave-	7/18/2014	7	2014
90113072	556 Krestral- FRANKLIN	7/18/2014	7	2014
90112692	832 Waterthrush Ln-HILL HAVEN-	7/17/2014	7	2014
90112691	823 Waterthrush Ln-	7/17/2014	7	2014
90112690	766 Black Creek Dr--	7/17/2014	7	2014
90112384	122 W Main-	7/24/2014	7	2014
90112033	7310 Huntley Ln-	7/24/2014	7	2014
90112032	2823 Firethorne Ln-	7/16/2014	7	2014
90112030	1806 Gray Rd--	7/16/2014	7	2014
90111678	715 Young Ave.-	7/15/2014	7	2014
90109002	411 Broad St-VISION HOSPITALITY	7/3/2014	7	2014
90108689	411 Broad St-VISION HOSPITALITY	7/3/2014	7	2014
90108050	1405 Cowart St 201-Southern Surgical	7/2/2014	7	2014
90106345	5250 Rotary Dr-	7/1/2014	7	2014
90106341	1401 Needle Rush Ln-	7/1/2014	7	2014
90105120	4205 Tennessee Ave-CHAPMAN-	7/24/2014	7	2014
90104819	907 Albany St-PATY-	7/17/2014	7	2014
90104817	2115 Merlin Dr-	7/17/2014	7	2014
90102788	601 Morrison Springs Rd-	7/8/2014	7	2014
90102787	525 Crewdson Ave-	7/21/2014	7	2014
90102783	1609 Edgewood Cir-	7/11/2014	7	2014
90062356	1825 Gunbarrel/2nd Floor -	7/9/2014	7	2014
90062357	1825 Gunbarrel/1st Floor	7/9/2014	7	2014
90075557	2245 Hickory Valley-SPEEDWAY7152	7/10/2014	7	2014
90089717	Alstom Windtower Ln	7/31/2014	7	2014
90007357	-2663 Waterhaven Dr	8/1/2014	8	2014
90009204	1922 Jefferson Street	8/1/2014	8	2014
90125169	7553 Igou Gap Rd-	8/26/2014	8	2014
90125010	1102 River Hills Drive (relocate)	8/27/2014	8	2014
90124822	4893-A Preserve Dr--	8/26/2014	8	2014
90124587	5823 McKinley St.-	8/25/2014	8	2014
90123450	1713 Glenn Rd	8/27/2014	8	2014
90121763	739 Wildrose Ln--	8/19/2014	8	2014
90121762	739 Wildrose Ln-	8/21/2014	8	2014
90120827	1004 Meroney-RCS CONSTR-	8/25/2014	8	2014
90120825	3613 Elder Mtn-MONTIETH -	8/12/2014	8	2014
90120824	3613 Elder Mtn-MONTIETH -	8/29/2014	8	2014
90120823	798 Tiger Lily-STEPHENS	8/20/2014	8	2014
90120822	797 Tiger Lily-STEPHENS -	8/20/2014	8	2014
90120792	1381 Bridgeview Dr	8/26/2014	8	2014
90120787	3924 Volunteer Dr	8/13/2014	8	2014
90120217	305 Keith St-PETERSON	8/12/2014	8	2014
90120216	305 Keith St-PETERSON DOM	8/19/2014	8	2014
90120215	1609 Edgewood-RAINES BROS-	8/21/2014	8	2014
90118386	156 W Hills Dr.	8/12/2014	8	2014
90118080	1695 Westover Ln-	8/6/2014	8	2014
90117919	1696 Westover Ln-	8/4/2014	8	2014
90117918	1975 Nottingham-	8/28/2014	8	2014
90117917	6800 Greenway Dr-	8/7/2014	8	2014
90117916	6806 Greenway Dr-	8/7/2014	8	2014
90116763	3037 Enclave Bay Dr.-	8/4/2014	8	2014
90116641	2340 Ashmore Ave-	8/8/2014	8	2014
90116458	2324 Ashmore Ave-	8/6/2014	8	2014
90116457	524 Fleetwood Dr--	8/12/2014	8	2014
90116133	4311 Nestledown Ct	8/8/2014	8	2014
90115851	1542 Keeble St-Anderson Construction	8/5/2014	8	2014
90115124	646 E 19th St-	8/15/2014	8	2014
90115123	654 E 19th St-	8/14/2014	8	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90115121	630 E 19th St-	8/5/2014	8	2014
90113079	3639 CRESTLINE DR -	8/6/2014	8	2014
90100188	1209 Pointe Centre-KUBIC COM	8/5/2014	8	2014
90134723	1325 Bridgeview-	9/26/2014	9	2014
90134528	8556 Festival Loop-ROWLAND DOM	9/26/2014	9	2014
90133719	1101 Concord-YOUNG	9/26/2014	9	2014
90133718	1518 Central Ave-ENGESBERG	9/29/2014	9	2014
90133717	6676 Kenton Ridge-RLP DOM LOT#23	9/26/2014	9	2014
90133312	2456 Waterhaven-SHENRY	9/23/2014	9	2014
90133310	2067 Peterson Dr.	9/23/2014	9	2014
90133161	324 Vine St-VINE DEV DOM	9/25/2014	9	2014
90131631	1318 W45th St-FISER -	9/25/2014	9	2014
90131629	1610 Cash Canyon Rd-	9/23/2014	9	2014
90131327	2124 Shepherd-CLIFT (City of Chatt)[HIND	9/22/2014	9	2014
90131325	1106 E 10th St-	9/22/2014	9	2014
90131324	3429 Alta Vista-TSMITH	9/26/2014	9	2014
90131323	2119 Merlin-THOMPSON	9/22/2014	9	2014
90131321	620 Oliver St-RTB	9/26/2014	9	2014
90131320	1385 W 54th-CRAVENS	9/17/2014	9	2014
90129077	20 S Tuxedo-CARD	9/15/2014	9	2014
90126381	7372 Huntley Ln-	9/11/2014	9	2014
90126199	7364 Huntley Ln-	9/11/2014	9	2014
90126195	3812 Lerch St-	9/9/2014	9	2014
90126194	3596 Pan Gap Cir	9/23/2014	9	2014
90125170	408 Forest Ave-	9/5/2014	9	2014
90125167	1718 Long St	9/2/2014	9	2014
90125166	2475 Waterhaven Dr	9/26/2014	9	2014
90125165	786 E M L King	9/15/2014	9	2014
90125164	784 E M L King	9/15/2014	9	2014
90120210	4893 Preserve Dr-	9/10/2014	9	2014
90117184	5824 Mc Kinley St-	9/3/2014	9	2014
90117183	311 Browns Ferry-	9/4/2014	9	2014
90117182	311 Browns Ferry	9/4/2014	9	2014
90144243	1515 Lafayette Rd- Unit2	10/28/2014	10	2014
90143532	17 Sawyer St-- (DARBY Sr)	10/30/2014	10	2014
90143425	2026 Belleau Village Ln -	10/25/2014	10	2014
90143424	2020 Belleau Village	10/25/2014	10	2014
90143423	2014 Belleau Village Ln -	10/25/2014	10	2014
90143237	2008 Belleau Village Ln-	10/24/2014	10	2014
90143235	2726 Waterhaven Dr.-	10/24/2014	10	2014
90143234	2424 Waterhaven Dr.-	10/30/2014	10	2014
90143164	832 Georgia Ave-CAMP HOUSE/DOM	10/28/2014	10	2014
90143067	5450 Hancock Ter-	10/30/2014	10	2014
90143065	1714 E 25th St. Apt A-Ellison	10/23/2014	10	2014
90142762	3546 Willow Lake Cir-	10/24/2014	10	2014
90142250	1951 Nottinghill--	10/23/2014	10	2014
90142249	3386 Belle Arbor - SEXTON	10/23/2014	10	2014
90141882	1016 Blackford Street [Erlanger]	10/21/2014	10	2014
90140936	7796 E Brainerd Rd	10/27/2014	10	2014
90140935	7796 E Brainerd Rd	10/27/2014	10	2014
90140862	543 Kestrel Ln-	10/23/2014	10	2014
90140522	1202 W. 46th St.-	10/27/2014	10	2014
90140521	1288 W. 46th St-	10/27/2014	10	2014
90140193	1000 Westwood Ave.--	10/14/2014	10	2014
90140192	1803 Carson	10/24/2014	10	2014
90140191	1801 Carson	10/24/2014	10	2014
90139914	506 Iron Wood Trl-	10/25/2014	10	2014
90139913	506 Iron Wood Trl--	10/14/2014	10	2014
90139912	3424 Glendon Dr--	10/29/2014	10	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90139787	6397 Lee Highway--	10/13/2014	10	2014
90139786	513 Mariner Way-	10/27/2014	10	2014
90139785	516 Mariner Way-	10/27/2014	10	2014
90139784	528 Mariner Way-	10/27/2014	10	2014
90139783	529 Mariner Way-	10/27/2014	10	2014
90139517	1002 Westwood Ave--	10/14/2014	10	2014
90138915	323 Pine Ridge Rd-	10/14/2014	10	2014
90138913	320 Chambliss St.-	10/14/2014	10	2014
90138491	2026 Belleau Village Lane	10/9/2014	10	2014
90138490	2020 Belleau Village Lane	10/9/2014	10	2014
90138489	2014 Belleau Village Lane	10/9/2014	10	2014
90138488	2008 Belleau Village Lane	10/9/2014	10	2014
90137633	1974 Madison St-	10/23/2014	10	2014
90137632	1966 Madison St-	10/23/2014	10	2014
90137631	1420 Adams St-	10/6/2014	10	2014
90137630	1418 Adams St.-	10/23/2014	10	2014
90137629	3608 Brass Lantern Way-	10/6/2014	10	2014
90137628	3606 Brass Lantern Way-	10/24/2014	10	2014
90137627	1260 Bridgeview Dr.-	10/24/2014	10	2014
90137626	1419 Quiet Pond Dr-	10/6/2014	10	2014
90137191	4115 Zephyr Ln-MILLER CONSTR	10/27/2014	10	2014
90137190	4130 Zehpyr Ln-MILLER CONSTR	10/27/2014	10	2014
90137189	1385 W 54th-CRAVENS (Off TN)	10/15/2014	10	2014
90137188	6060 Shallowford Rd-MCELROY	10/20/2014	10	2014
90136803	6397 Lee Hwy	10/7/2014	10	2014
90136802	1095 Ault Dr	10/2/2014	10	2014
90136560	206 Peak-	10/14/2014	10	2014
90136417	627 Snow	10/1/2014	10	2014
90136416	208 Peak	10/1/2014	10	2014
90136413	623 Snow-	10/14/2014	10	2014
90136384	1000 Westwood-	10/16/2014	10	2014
90136383	8516 Festival Loop	10/13/2014	10	2014
90136382	8522 Festival Loop	10/13/2014	10	2014
90136381	8530 Festival Loop	10/1/2014	10	2014
90136380	1208 Hanover St-	10/23/2014	10	2014
90136119	8208 Patterson-	10/23/2014	10	2014
90135025	2476 Waterhaven Dr	10/8/2014	10	2014
90134725	7 Fairhill Dr-BOYD	10/23/2014	10	2014
90134724	1325 Bridgeview-	10/28/2014	10	2014
90133840	3561 Garner Rd	10/29/2014	10	2014
90125168	7553 Igou Gap Rd-	10/20/2014	10	2014
90153258	108 Fair St Garage	11/26/2014	11	2014
90152054	8500 Morin Rd-	11/21/2014	11	2014
90151567	905 Wall St 5/8'	11/19/2014	11	2014
90151566	909 Wall St	11/19/2014	11	2014
90151565	2859 Waterhaven	11/26/2014	11	2014
90151563	1633 Andover PL	11/20/2014	11	2014
90151562	6692 Kenton Ridge Circle	11/20/2014	11	2014
90149511	5922 Shallowford Rd	11/20/2014	11	2014
90149509	4880 Preserve Dr.	11/21/2014	11	2014
90149507	8518 Morin Rd-	11/13/2014	11	2014
90149506	8524 Morin Rd-	11/19/2014	11	2014
90149505	8512 Morin Rd-	11/19/2014	11	2014
90149504	8480 Morin Rd-	11/20/2014	11	2014
90149503	8472 Morin Rd-	11/20/2014	11	2014
90149501	8450 Morin Rd-	11/13/2014	11	2014
90149014	450 Cherokee Blvd-	11/17/2014	11	2014
90148522	4782 Preserve Drive	11/24/2014	11	2014
90147452	214 Blackwell Farm RD	11/13/2014	11	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90147451	3806 Kingwood Cir-	11/18/2014	11	2014
90147450	2332 Ashmore Ave	11/14/2014	11	2014
90147449	200 Peak St -	11/6/2014	11	2014
90147126	1984 Belleau Vil--	11/5/2014	11	2014
90147125	1990 Belleau Vill--	11/5/2014	11	2014
90147124	1996 Belleau Vill--	11/5/2014	11	2014
90147123	2002Belleau Village--	11/5/2014	11	2014
90146967	4374Guild Trail-	11/18/2014	11	2014
90146522	1099 Morris Ln	11/7/2014	11	2014
90144242	1515 Lafayette Rd- Unit3	11/4/2014	11	2014
90144241	1515 Lafayette Rd- Unit4	11/4/2014	11	2014
90144050	529-A Lower Cravens Ter.-	11/4/2014	11	2014
90143236	2506 Ocoee St-	11/5/2014	11	2014
90143233	1116 Westwood Ave-	11/11/2014	11	2014
90143232	1114 Westwood Ave.-	11/11/2014	11	2014
90143163	7700 Aspen Lodge Way-	11/7/2014	11	2014
90143162	7400 Standifer Gap-	11/3/2014	11	2014
90143066	1078 Hurricane Creek Rd-	11/4/2014	11	2014
90141884	1055 E 3rd Street [Erlanger]	11/4/2014	11	2014
90141881	1001 E 3rd Street [Erlanger]	11/4/2014	11	2014
90140520	720 Dallas Rd-	11/18/2014	11	2014
90137192	531 Lower Cravens	11/5/2014	11	2014
90136801	1013 Cumberland-	11/3/2014	11	2014
90136386	354 Sweetland-Red Bank-	11/4/2014	11	2014
90136385	1715 Auburndale-	11/10/2014	11	2014
90134727	1112 Westwood Ave-	11/11/2014	11	2014
90134726	1110 Westwood Ave-	11/11/2014	11	2014
90161505	2352 Ashmore Ave-	12/30/2014	12	2014
90161503	2336 Ashmore Ave-	12/30/2014	12	2014
90161502	2115 Merlin Dr--	12/30/2014	12	2014
90161457	1958 Madison St-	12/30/2014	12	2014
90161451	535 Barton Ave	12/30/2014	12	2014
90161352	210 S Mission Ridge Dr A-Rossville GA	12/30/2014	12	2014
90159468	661 E 16th St-	12/19/2014	12	2014
90159466	649 E 16th St.-	12/20/2014	12	2014
90159464	637 E 16th St-	12/22/2014	12	2014
90159462	625 E 16th-	12/22/2014	12	2014
90159461	619 E 16th St-	12/22/2014	12	2014
90159119	609 E 16th St-	12/22/2014	12	2014
90159117	1118Highland Dr-	12/30/2014	12	2014
90159002	1684 Westover Ln	12/29/2014	12	2014
90159001	1676 Westover Ln	12/29/2014	12	2014
90157123	2193 Park Dr.-	12/11/2014	12	2014
90155483	1405 Cowart St Ste 115	12/5/2014	12	2014
90155482	650 E. 19th	12/5/2014	12	2014
90155481	1964 Rossville Ave	12/5/2014	12	2014
90155058	168 Signal Hill Drive Unit B	12/4/2014	12	2014
90155057	168 Signal Hill Drive Unit A	12/11/2014	12	2014
90154603	4838 Preserve Dr.	12/2/2014	12	2014
90154602	4852 Preserve	12/3/2014	12	2014
90152055	8434 Morin Rd-	12/2/2014	12	2014
90151998	1102 Jarvis Ave-	12/8/2014	12	2014
90151997	1100 Jarvis Ave-	12/10/2014	12	2014
90151996	3426 Enclave Bay Dr	12/11/2014	12	2014
90151564	5922 Hancock Rd	12/5/2014	12	2014
90151561	4540 TURNTABLE RD	12/1/2014	12	2014
90149510	4162 Zephyr Ln	12/3/2014	12	2014
90149508	4827 Preserve	12/11/2014	12	2014
90140863	4403 Seneca Ave-	12/18/2014	12	2014

2014 Address Listing of New Services and New Meters

Order No.	Location	Finish Date	Installation	Column1
90116358	1209 Pointe Center Dr	12/1/2014	12	2014
90113181	1381 Bridgeview Dr	12/1/2014	12	2014
90075840	7400 Standifer Gap Rd-	12/2/2014	12	2014
90078945	1718 Long	12/2/2014	12	2014
90092335	2193 Park Dr	12/2/2014	12	2014

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

While TAWC does not attempt to create or track data that would provide the direct correlation between the creation of jobs and the work associated with specific Line G Projects, TAWC makes every attempt to stay abreast of publicly available information regarding economic growth and job creation in the area. TAWC believes that these types of investments are important to the economic development of the community. The work associated with this line is driven from the requests for new services by new companies or new residences or from relocating companies or residents in to new areas being developed within the city. New services foster economic development by creating jobs, providing new residents, and increasing taxes paid to the local government. Further, the development of these areas is bringing jobs into the community through the construction jobs and revenues from additional taxes paid during construction.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

The capital expenditures in Line G-Service, New for 2015 in Docket No. 14-00121 are an estimate of expected total expenditures in 2015 and are not tied to specific service installations that have not been requested yet. TAWC based its expected spend on the previous spend within this line for the past several years. Therefore, the information requested is not available. As indicated in the Direct Testimony of Brent O'Neill for Docket No. 14-00121 on page 13 lines 3 through 8, TAWC plans to spend approximately \$480,000 on the installation of approximately 360 services at an average cost of \$1,333 per service. Further, TAWC has not identified any significant installations of new services since the company has not been made aware of any requested installations.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

At this time TAWC has not identified any significant installations of new services since the company has not been made aware of any requested installations. The capital expenditures in Line G-Service, New for 2015 in Docket No. 14-00121 are an estimate of expected total expenditures in 2015 and are not tied to specific service installations that have not been requested yet. TAWC based its expected spend on the previous spend within this line for the past several years. Therefore, the information requested is not available. The work associated with this line is driven from the requests for new services by new companies or new residences or from relocating companies or residents in to new areas being developed within the city. New services foster economic development by creating jobs, providing new residents, and increasing taxes paid to the local government. Further, the development of these areas is bringing jobs into the community through the construction jobs and revenues from additional taxes paid during construction.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

TAWC installed 535 new meters and meter settings during 2014. The cost for material and installation of these meters and setters are not independently tracked by separate projects but are grouped by the size of meter installed. Please refer to the attachment to the response to Question 22 of this same discovery request.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

While TAWC does not attempt to create or track data that would provide the direct correlation between the creation of jobs and the work associated with specific Line G Projects, TAWC makes every attempt to stay abreast of publicly available information regarding economic growth and job creation in the area. TAWC believes that these types of investments are important to the economic development of the community. The work associated with this line is similar to that described for Line G. New meters, as part of the new service installations, foster economic development by creating jobs, providing new residents, and increasing taxes paid to the local government. Further, the development of these areas is bringing jobs into the community through the construction jobs and revenues from additional taxes paid during construction.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

The capital expenditures in Line I-Meters and Meter Settings, New for 2015 in Docket No. 14-00121 are an estimate of expected total expenditures in 2015 and are not tied to specific meters or meter settings that have not been requested yet. TAWC based its expected spend on the previous spend within this line for the past several years. As indicated in the Direct Testimony of Brent O'Neill for Docket No. 14-00121 on page 13 lines 12 through 16, TAWC plans to spend approximately \$575,000 on the installation of approximately 738 new meters and setters at an average cost of \$779 per meter and setter. At this time TAWC has not identified any significant installations of new meters since the company has not been made aware of any requested installations.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

At this time TAWC has not identified any significant installations of new meter since the company has not been made aware of any requested installations. This investment plan item includes the installation of new meters and meter settings. Accompanying new services, new meters and meter settings include all new meters regardless of size. All new meters along with new services foster economic development by creating jobs, providing new residents, and increasing taxes paid to the local government. As indicated in the response to Question 27 of this same discovery request, the work associated with this line is driven from the requests for new meters by new companies or new residences or from relocating companies or residents in to new areas being developed within the city.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

Please refer to Brent O'Neill's Testimony in Docket No. 15-00029, page 9, lines 6-9. TAWC made the decision to delay the spend of \$95,573 for the purchase of fuel alternative vehicles and/or the conversion of vehicles due to concerns of technology maturity and the availability of alternative fuels and its impact to operations to locate the fuels for refilling the vehicles.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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

Response:

TAWC spent \$524,186 in 2014 under Line O, Vehicles. However, as identified in the filing in Docket No. 15-00029, no capital expenditures under 2014 Line O Equipment qualified for inclusion in the QIIP, EDI, or SEC.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As indicated in the Direct Testimony of Brent O'Neill for Docket No. 14-00121 on page 14 lines 3 through 12, TAWC plans to spend \$100,000 out of a total of \$400,000 in Line O for 2015 on alternative fuel vehicles. TAWC plans to purchase five new vehicles to replace existing vehicles that are reaching their expected service life or have seen an increase in maintenance cost. Of these five vehicles, TAWC expects to continue to evaluate the purchase of some of the new vehicles with the capability to use alternative fuels such as Liquid Propane ("LP") or natural gas. In addition, TAWC plans to convert two existing vehicles within its fleet to be able to use LP. As with the decision to not purchase the alternative fuel vehicles in 2014, TAWC will continue to determine if the technology maturity and the availability of alternative fuels will impact to operations to locate the fuels for refilling the vehicles and will not be in the best interest of the company.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

Please refer to the response to Question 32 of this same discovery request.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

The following projects were undertaken as part of the Line Q – Process Plant and Equipment during 2014:

- 1) Replace No. 16 High Service Motor at Citico Water Treatment Plant to ensure high service pumping reliability and improve wire to water efficiency for the Citico facility. Project cost was \$78,132 and was placed in service on June 30, 2014.
- 2) Replace No. 18 High Service Motor at Citico Water Treatment Plant to ensure high service pumping reliability and improve wire to water efficiency for the Citico facility. Project cost was \$76,415 and was placed in service on June 30, 2014.
- 3) Rehabilitation of Aldrich Unit No. 4 at the Citico Water Treatment Plant to rehabilitate the filter insert plates to address loss of media. Project cost was \$23,176 and was placed in service on July 31, 2014.
- 4) Replace UPS (Uninterruptable Power Source) Battery Back Up for the Pump Station and Chemical Building at the Citico Water Treatment Plant to replace existing UPS systems that were installed during the mid 1990's and ensure facility reliability during power failures. Project cost was \$25,181 and was placed in service on April 17, 214.
- 5) Replace North End Field House #2 Surface Wash Connection at Citico Water Treatment Plant to allow for better control of surface wash for the Citico filters. Surface wash is critical to reducing sedimentation break-through and ensuring water quality through filters. Project cost was \$7,662 and was placed in service on March 27, 2014.
- 6) Rehabilitation of Hill City No. 7 Pump at the Hill City Booster Pump Station to ensure pumping reliability and improve wire to water efficiency. Project cost was \$68,432 and was placed in service on March 9, 2014.

- 7) Citico Station Water Treatment Plant Filter No. 4 Filter Rehabilitation at the Citico Water Treatment Plant to replace the existing underdrain system with more efficient filter underdrain equipment and allow for future installation of an air wash system. Project was to ensure future compliance with water quality standards and improve operation of the facility. Project cost was \$301,608 and was placed in service on August 29, 2014.
- 8) Purchase and install Air Release Valves for Filter House No. 2 at the Citico Water Treatment Plant. Installation of air release valves was to address release of trapped air in filter backwash lines that could result in catastrophic failure of underdrain system. Project cost was \$4,119 and was placed in service on April 17, 2014.
- 9) Replace Carbon Slurry Line for the Citico Water Treatment Plant to ensure reliability to introduce carbon slurry into treatment process to address taste and odor events, contaminant removal in raw water, and ensure compliance with water quality requirements. Project cost was \$41,302 and was placed in service on June 16, 2014.
- 10) Replace No. 12 Low Service Coupling at the Citico Water Treatment Plant to ensure reliability of raw water intake for the treatment plant. Project cost was \$23,138 and was placed in service on June 25, 2014.
- 11) Install Valve at Citico Water Treatment Plant to ensure ability to isolate areas of the plant and ensure reliability to continue to produce treated water. Project cost was \$9,862 and was placed in service on July 16, 2014.
- 12) Replace Hill City Backflow Preventer and Pressure Reducing Valve at the Hill City Booster Station. Project cost was \$5,431 and was placed in service on August 17, 2014.
- 13) Install New Impeller for St. Elmo Booster Pump to ensure reliability of booster station and to ensure efficient operation of station. Project cost was \$9,632 and was placed in service on August 28, 2014.
- 14) Replacement of the roof at Rossville Booster Station, Red Bank Booster Station, New York Booster Station, Elder Mountain Booster Station, Citico Screen House Building. The replacement of the roof was to ensure protection of the equipment within the structures and provide a safe working environment for personnel. Project cost was \$70,151 and were placed in service between December 15 and 17, 2014.
- 15) Replacement of Citico Plant No. 1 Post Chlorine Feed Line at the Citico Water Treatment Plant to ensure ability to feed disinfectant to the finished water to meet required drinking water requirements. The project cost was \$2,914 and was placed in service on December 17, 2014.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As indicated in the Direct Testimony of Brent O'Neill in Docket No. 14-00121 on page 17, lines 2 through 11, TAWC plans on the replacement of six conventional filter under-drain systems at the Citico Water Treatment Plant No. 2 to ensure continued environmental compliance at a per filter cost of \$220,000 with a combined cost of \$1,320,000. A \$300,000 investment is planned that will entail the replacement of the cone valves on the high service discharge at the Citico Water Treatment Plant due to the inability to obtain parts for the valves and to improve the efficiency of the control of flow from the high service pumps. TAWC will change out two high service motors at the Citico Water Treatment Plant to improve on power efficiency and reliability of high service pumping at an approximate cost of \$132,300. Other work, such as improvements to the chemical vaults on the Citico facility and the addition of a tank aeration system at Elder Mountain Tank, are expected to be completed during this period as well.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As indicated in the Direct Testimony of Gary VerDouw in Docket 13-000130, page 34 lines 18 and 19, "Tennessee American believes that environmental compliance investments are specifically related to the safety of the drinking water and in the public interest". As indicated in the Congressional Research Service publication dated February 5, 2014 titled *Safe Drinking Water Act (SDWA): A Summary of the Act and Its Major Requirements*, "A key component of SDWA is the requirement that the EPA promulgate national primary drinking water regulations for contaminants that may pose health risks and that are likely to be present in public water supplies." With the key component being the regulation of contaminants that pose a health risk to its customers, compliance with those regulations is a safety requirement imposed on the company to ensure safe drinking water. In addition, the company must meet the requirements as set forth by the Tennessee Department of Environmental and Conservation whose Mission Statement is "to enhance the quality of life for citizens of Tennessee and to be stewards of our natural environment by: Protecting and Promoting human health and safety".

The projects identified in the 2014 Line Q Item and 2015 Line Q Item were undertaken primarily to ensure that the company can meet water quality requirements, public health requirements and safety requirements. These requirements are included in legislation such as the Safe Drinking Water Act, and specifically the requirements to the Tennessee Department of Environment and Conservation. In addition to the Federal and State Environmental Protection Agencies, some of the projects are associated with protecting our employees from unsafe working environments as required by the United States Department of Labor Occupational Safety and Health Administration (29 CFR, Part 1910 – Occupational Safety and Health Standards).

Although this is not intended to be an exhaustive list of drinking standard requirements, drinking water standards are set primarily by the Environmental Protection Agency within Title 40, Chapter I, Subchapter D, Part 141 and the Tennessee Department of Environmental and Conservation requirements as set forth in Chapter 0400-45-01 Public Water Systems. The projects allow the company to reliably produce safe drinking water in a safe environment for our employees.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Brent E. O'Neill**

Question:

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:

As indicated in Question 36, Tennessee American believes that environmental compliance investments are specifically related to the safety of the drinking water and in the public interest. Typical to surface water treatment plants, the Citico Water Treatment Plant needs to eliminate water and sludge for the water treatment process in an approved manner. This is either done by discharging directly into the Waters of the United States or forwarding onto a wastewater facility for further processing until it is passed onto the Waters of the United States. In both cases the discharge is controlled by the Clean Water Act which is administered by both the Federal Environmental Protection Agency and the Tennessee Department of Environment and Conservation. The discharge must meet the standards as set forth in the Clean Water Act (CWA); Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR, Part 257), among others. Section 257.3-3 Surface Water, paragraph b indicates that section 404 of the Clean Water Act be followed.

The Federal Environmental Protection Agency web site on Section 404 Enforcement indicates "...that EPA's Section 404 enforcement program has three goals: protect the environment and human health and safety, deter violations, and treat the regulated community fairly and equitably."

(<http://water.epa.gov/type/wetlands/outreach/fact15.cfm>)

With the Citico Water Treatment Plant, Tennessee American Water has used the option to forward the filter backwash and sludge from the water treatment process to the City of Chattanooga sanitary system. Similar to Tennessee American Water, the City of Chattanooga is also held to the same regulations as stated in the Clean Water Act. In order to ensure that the city can meet the requirements as set out by the Clean Water Act, the City employs a pretreatment permit for industrial customers such as Tennessee American Water. Tennessee American Water is under City of Chattanooga Permit No. 0074. This permit outlines certain effluent limitations which allows the City of Chattanooga to meet the Clean Water Act and meet their mission "... to preserve and enhance the quality of the physical environment and infrastructure through prompt, cost effective and courteous delivery of services which protect the health, safety and welfare

of citizens.” (<http://www.chattanooga.gov/public-works/waste-resources/interceptor-sewer/pretreatment>)

The Citico Process Wastewater Improvement Project allows Tennessee American Water to meet the effluent limitations as indicated in the Wastewater Discharge Permit No. 0074 and to address the development of a Pretreatment System as indicated in the permit. Upon completion, this project will address the permit and allow the City of Chattanooga to comply with the Clean Water Act and meet its mission to protect the health, safety and welfare of the citizens. Tennessee American Water believes that the protection of water resources is a critical component of safety of public health.

Without the completion of the Citico Process Wastewater Improvement Project, TAWC will not be able to remove the zinc-rich sediment that is settled from the raw water during the water treatment process. Without the removal of the sediment from the sludge discharge, the material sent to the City of Chattanooga would exceed the zinc limits outlined in the Wastewater Discharge Permit No. 0074 and could jeopardize the City of Chattanooga compliance with their NPDES Permit No. TN0024210.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

Tennessee American is not seeking recovery for any expenditures for the Investment Project Citico Phase 1B in Docket No. 14-00121.

2015 Line B – Mains Replaced/Restored is the scheduled replacement, renewal or improvement of existing water mains including valves and other appurtenances that are necessary to perform the work. A description of the ten projects anticipated to make proposed \$1,500,000 in capital expenditures in 2015 Line B is included in Brent O'Neill's testimony beginning at page 6, Line 10. However, as with all forecasts for Line B, Tennessee American may be required to move projects around or delay anticipated projects to accommodate other projects or capital expenditures that may arise unexpectedly. 2015 Line C – Mains Unscheduled is the unscheduled replacement or restoration of existing or restoration of existing water mains, including valves and other appurtenances that are necessary to perform the work. As the description implies, these are unscheduled replacements and are therefore not detailed. Tennessee American has proposed \$800,000, similar to the amount for 2014. 2015 Line D- Mains-Relocated/Repaired is the relocation of existing water mains, including valves and other appurtenances, that are necessary due to municipal or state agency projects that are not reimbursable. At this time, Tennessee American is not aware of any specific major projects, but has proposed \$350,000 for 2015.

Gary VerDouw, in his direct testimony in Docket No. 13-00130, beginning at page 9, describes the critical need for replacement of water infrastructure. In 2013, the American Society of Civil Engineers identified a shortfall of \$13 billion of investment each year to replace aging infrastructure and maintain reliable and safe drinking water systems. As described on page 12, a substantial portion of Tennessee American's distribution infrastructure is between 50 and 100 years old and is nearing or at the end of its useful service life. Replacing critical, aged infrastructure is in the public interest whether it is scheduled, or unscheduled. Further, the relocation of mains in conjunction with municipal or state agency projects is in the public interest in order not to delay or increase the cost of municipal or state agency projects.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

Line A – Mains, New

This line item includes new water mains, valves, and other appurtenances that are necessary to perform the work that is funded by the TAWC, including upsizing of developer initiated extensions; Company initiated and funded new mains that are not related to immediate growth, such as new mains that eliminate existing dead ends or provide new transmission capacity; and new customer initiated extensions in accordance with tariffs that may include some customer contribution (customer funded portion under Developer Initiated Projects). This item may also include new mains that parallel existing mains to increase transmission capacity, provide reliability, increase fire protection or establish an additional pressure gradient. These efforts to improve, enhance, and increase transmission mains are in the public interest. Similar to the Coca Cola project, Line A is utilized to foster economic development through new mains in place for new customers or to address reliability or additional demands.

Line E – Hydrants and Valves, New

This investment plan item includes the installation of new hydrants, including hydrant assemblies and valves that are installed on existing mains or installed in conjunction with main extension projects, which are company funded. This item generally includes all public hydrants. Fire protection, either new or enhanced, saves lives and is in the public interest. This item is used to foster economic development by providing new fire protection or enhancing fire protection in currently served areas beyond what is created under CIAC. These efforts to provide either new or enhanced fire protection, along with improved reliability, are in the public interest. Improved infrastructure in existing older service areas, including fire protection, is a key to redevelopment in economic growth.

Line G – Services, New

This investment line item includes the installation of new water services or improvements, including corporation stops which are the valves that drill into the main to connect the service line to TAWC's water main and shut-off valves. TAW has included all new services in the Line G, including residential, commercial, industrial and fire

services. New services benefit existing customers through economies of scale, and are in the public interest. Clearly, all new services foster economic development by creating jobs, providing new residents, and increasing taxes paid to the local government.

Line I – Meters and Meter Settings, New

This investment plan item includes the installation of new meters and meter settings. As with new services, new meters provide economies of scale for existing customers and are in the public interest. Accompanying new services, new meters and meter settings include all new meters regardless of size. All new meters along with new services foster economic development by creating jobs, providing new residents, and increasing taxes paid to the local government.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 14-00121
FIRST DISCOVERY REQUEST OF THE CITY OF CHATTANOOGA

Responsible Witness: **Linda C. Bridwell**

Question:

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:

Line Q- Process Plant Facilities and Equipment

This investment line item is for the new purchase or replacement of existing components of water supply, water treatment, water pumping, water storage, and water pressure regulation facilities, including associated building components and equipment. Replacements may be planned or made because of failure, or may include improvements. Again, because these items are directly related to water quality and thus public health, TAW has included them in the Safety and Environmental Compliance Capital Rider. In 2014 TAW proposed \$797,990 and is proposing 2,631,203 in 2015. The increased investment level is based on the replacement of six conventional filter underdrain systems to ensure continued environmental compliance at a per filter cost of \$220,000 of combined cost of \$1,320,000. In addition a \$300,000 investment will be the replacement of the cone valves on the high service discharge due to the inability to obtain parts for the valves and to improve the efficiency of the control of flow from the high service pumps. TAW will change out two high service motors to improve on power efficiency and system reliability at an approximate cost of \$132,300. Other work such as improvements to the chemical vaults on the Citico facility and the addition of a tank aeration system at Elder Mountain Tank are expected to be completed during this period. Improvements to production facilities that are directly related to water quality and thus public health, are in the public interest.

Citico Process Wastewater Improvement Project

TAWC has a Capital Investment Project that will be placed in service during 2015. The project is the Citico Process Wastewater Improvement Project with an approximate cost of \$15.3 million. The Citico Process Wastewater Improvements is intended to address the change in permit requirements from the City of Chattanooga on the allowable level of zinc to be discharged to the city's wastewater collection system. Because of the zinc levels in the surface water source for the Citico Station Plant, this option was selected as the most cost effective solution. Tennessee American will need to meet the new discharge requirement during early 2015 as indicated in the Pretreatment Permit No. 0074.

The Process Wastewater Improvement Project includes the modification of the existing Thickener No. 1 to receive sediment and sludge from Plant 1 and installation of a thickened sludge transfer pump station to transfer material from the thickener to the new dewatering facilities. The project will add a sludge storage tank to receive thickened sludge from Thickener No. 1 prior to polymer addition and dewatering and reducing the potential operational challenges caused by the new transfer pump station. A second thickener will be added to operate in parallel with Thickener No. 1 and serve the sediment and sludge from Plant 2, and provide a measure of redundancy for sludge thickening when maintenance is required on either thickener. A concrete tank structure with a fixed weir and adjustable weir will be constructed to split the sedimentation and sludge discharge from Plant 1 between the two thickeners to ensure optimal operation of the thickeners. The two weirs, or thin walls built to allow only the clear surface water to discharge, allows for the efficient separation of the decant water and the sludge at the bottom of the tank. A filter backwash equalization and decant tank for Plant 1 will be constructed with a volume of 200,000 gallons to allow for the handling of backwash activities from Plant 1 and will work in parallel with the existing backwash equalization tank for Plant 2 to allow the thickeners to operate efficiently and produce consistent thickened sludge. The major component added with the project will be a mechanical centrifuge dewatering equipment and a building to house the two (2) centrifuge dewatering units, polymer storage and feed system, dewatered sludge conveyance equipment and truck loading area. The building will also house the needed electrical and control equipment for dewatering equipment installed with the project.

The two centrifuges and associated improvements will provide adequate dewatering capacity and redundancy for processing average daily and maximum week solids loading conditions from the sedimentation removal of both Plant 1 and 2. To dewater the average daily solids from the two plants it is anticipated that the two centrifuges will need to operate approximately 9.5 hours a day for five days a week allowing for operation of the facilities with existing plant personnel. TAW believes this project to be a key component in improving water quality in the Tennessee River and strongly believes that protecting water quality, for both TAW customers and downstream users, is a critical component of public health and safety. TAW believes that protecting water quality is in the public interest.