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July 14, 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 Changes to the Qualified Infrastructure Investment Program Rider, the Economic Development Investment Rider, and the Safety and Environmental Compliance Rider, TRA Docket No. 15-00029*

Dear Chairman Hilliard:

Attached for filing please find *Tennessee-American Water Company's Responses to the TRA's First Set of Data Requests, dated July 6, 2015*, 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.

Very truly yours,

BUTLER SNOW LLP


Melvin J. Malone

clw

Attachment

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

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**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

1. Reference page 18, line 14 of Ms. Bridwell's direct testimony. Please define "primarily part of construction".

Response:

Construction generally takes place during the spring, summer and fall each year. At times, there are small remaining clean-up items, or costs that aren't invoiced until the first few months of the following year. Tennessee American reviewed each of the projects that had a work order initiated prior to the end of 2013, but not placed in service until 2014. If the majority of the project costs occurred prior to the end of 2013, then the project was clearly a 2013 project that simply had clean-up or late charges and it was excluded. If the majority of the costs occurred in 2014, then the project was assumed to simply have preliminary costs prior to 2014 and was included. During the review, Tennessee American did not establish a strict percentage to determine one or the other, but all of the projects were easily discernable with over 75% of the costs or more either occurring in 2014 or prior to 2014.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

2. Provide an explanation of all alternative fuels with corresponding dollar amount, if any, included for recovery in the EDI Rider.

Response:

No capital expenditures were made in 2014 related to alternative fuels and project line L - Vehicles and therefore no dollar amount is included in the recovery and reconciliation of the EDI Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

3. Provide a listing of all operating expenses, if any, included for recovery in the EDI Rider.

Response:

No operating expenses are included in the recovery and reconciliation of the EDI Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

4. Provide a listing of all contributions and corresponding dollar amount, if any, included for recovery in the EDI Rider.

Response:

No contributions were included in the recovery and reconciliation of the EDI Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

5. Provide the quantity and corresponding dollar amount, if any, for all new service lines included for recovery in the QIIP Rider.

Response:

There are no new service lines included in the reconciliation of the QIIP Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

6. Provide the quantity and corresponding dollar amount, if any, for all new meters included for recovery in the QIIP Rider.

Response:

There are no new meters included in the reconciliation of the QIIP Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

7. Provide the quantity and corresponding dollar amount, if any, for all new meter installations included for recovery in the QIIP Rider.

Response:

There are no new meter installations included in the reconciliation of the QIIP Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

8. Provide the quantity and corresponding dollar amount, if any, for all new service lines included for recovery in the EDI Rider.

Response:

\$709,660 is the actual amount for new services for 535 new service lines included in the EDI Rider Reconciliation.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

9. Provide the quantity and corresponding dollar amount, if any, for all new meters included for recovery in the EDI Rider.

Response:

\$136,631 is the actual amount for new meters for 535 new meters in 2014 included in the EDI Rider Reconciliation.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

10. Provide the quantity and corresponding dollar amount, if any, for all new meter installations included for recovery in the EDI Rider.

Response:

\$144,915 is the actual amount for new meter installations, for 535 new meter installations included in the EDI Rider Reconciliation.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

11. Provide the quantity and corresponding dollar amount, if any, for all new service lines included for recovery in the SEC Rider.

Response:

There are no new service lines included in the reconciliation of the SEC Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

12. Provide the quantity and corresponding dollar amount, if any, for all new meters included for recovery in the SEC Rider.

Response:

There are no new meters included in the reconciliation of the SEC Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

13. Provide the quantity and corresponding dollar amount, if any, for all new meter installations included for recovery in the SEC Rider.

Response:

There are no new meter installations included in the reconciliation of the SEC Rider.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 15-00029
FIRST DISCOVERY REQUEST OF THE
TENNESSEE REGULATORY AUTHORITY**

Responsible Witness: Linda C. Bridwell

Question:

14. Provide a listing of all operating expenses, if any, included for recovery in the SEC Rider.

Response:

No operating expenses are included in the recovery and reconciliation of the SEC Rider.