

09/15/2016

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

**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 AND IN SUPPORT OF THE)
CALCULATION OF THE 2016 CAPITAL)
RIDERS RECONCILIATION)**

Docket No. 16-00022

MOTION TO RESCHEDULE HEARING TO NOVEMBER TRA CONFERENCE

The Consumer Protection and Advocate Division of the Office of the Attorney General (“Consumer Advocate”), requests that the hearing in this case currently scheduled for October 14, 2016, be rescheduled to the November TRA Conference.

The Consumer Advocate makes this request after reviewing the *Tennessee-American Water Company’s Responses to Fourth Set of Discovery Requests of the Consumer Protection and Advocate Division* filed at the TRA on September 9, 2016. This review revealed the following problems with the Tennessee American filings:

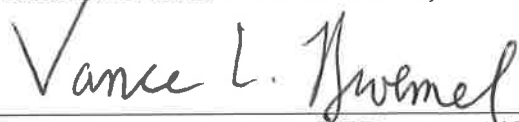
1. In Item No. 7 of their response, TAWC provided a new 470-page filing calculation that reduced the surcharges that were originally proposed in order to correct what the Consumer Advocate contends are errors in the original filing. This new filing makes the following proposed changes to the capital rider surcharges:

Rider	Original	Revised
QIIP	1.170%	1.166%
EDI	-0.178%	-0.178%
SEC	-0.102%	-0.118%
Total	0.890%	0.870%

The Company's data response essentially results in a new request that now needs to be reviewed. Accordingly, the Consumer Advocate believes this new request should be put in a new filing that makes clear exactly what the Tennessee American request is, rather than having to find that request in a discovery response.

2. In addition, the Company's data responses reveal that TAWC has calculated some costs using a 12-month average and then used a 13-month average to calculate these same costs in a different period. This change in the rider formula was made by the Company without any notice in their testimony. Also, in their response, the Company states that the 12 and 13 month averages are both correct. The Consumer Advocate disagrees with the Company's formula change and would propose a consistent methodology in a new filing for the calculation which will further lower the surcharge.

RESPECTFULLY SUBMITTED,



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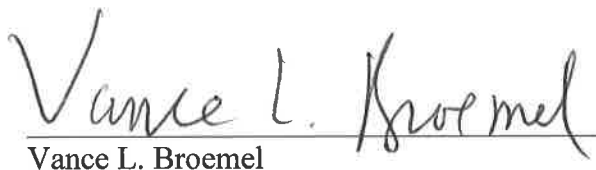
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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This the 15 day of September, 2016.


Vance L. Broemel