

**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 FOR EXTENSION OF TIME TO FILE
PRE-FILED TESTIMONY AND TO MOVE TARGET HEARING DATE**

Comes the Consumer Protection and Advocate Division of the Office of the Attorney General (“Consumer Advocate”), and hereby requests an extension of time until August 8, 2016, to file its Intervenor Pre-Filed Testimony in the above-captioned docket and also requests to move the target hearing date to September (the Intervenor’s Pre-Filed Testimony is currently due July 7, 2016).

In support of this Motion, the Consumer Advocate would show:

1. On July 5, 2016, the Consumer Advocate sent Tennessee-American Water (“Company”) a first informal data request. A copy is attached as Exhibit A. The first three questions in the first informal request dealt with the depreciation expense used by the Company. Based on an initial review of the Company’s filing, the Consumer Advocate has reason to believe there may be an error regarding depreciation expense that would require an extensive revision of the filing by the Company.

2. The Consumer Advocate also has sent the Company a second informal data request today, Thursday, July 7, 2016. A copy is attached as Exhibit B.

3. The Consumer Advocate respectfully suggests that it will need time to analyze the Company's responses to the two informal discovery requests before preparing testimony. Also, the Company should be given time to present its response to and perspective on any potential issue that arises in the discovery process.

4. The Consumer Advocate believes that it would be more helpful to the TRA to have the Consumer Advocate's witness prepare and file testimony that is responsive to any revised filing that results from the discovery process, rather than prepare and file testimony that would be based on the current filing, with its already identified, but unclear at this point, concerns, such as the potential error regarding depreciation expense.

5. Accordingly, the Consumer Advocate's request of an extension of time and to move the hearing date to September is reasonable and benefits all parties and the TRA.

6. The Consumer Advocate has spoken with the Company concerning the extension of time requested in this Motion. The Company is currently reviewing the data requests of the Consumer Advocate but does not anticipate finishing its review and deciding on whether they agree an extension is warranted before the end of the day Thursday. Accordingly, the Consumer Advocate is filing this request for an extension of time and to move the target hearing date in order to preserve its rights. The parties have agreed to continue to talk.

In view of the foregoing, the Consumer Advocate respectfully requests that the Hearing Officer extend the due date for the referenced Intervenor Pre-Filed Testimony until August 8, 2016 and move the target hearing date to September. And in view of the immediacy of the current

deadline, expedited consideration is respectfully requested.

RESPECTFULLY SUBMITTED,

A handwritten signature in dark ink, reading "Vance L. Broemel". The signature is written in a cursive style with a large, stylized "V" and "B".

VANCE L. BROEMEL (BPR No. 011421)

Senior Counsel

Office of the Attorney General

P.O. Box 20207

Nashville, Tennessee 37202-0207

(615) 741-8733

vance.broemel@ag.tn.gov

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:

Linda Bridwell
Manager of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502
linda.bridwell@amwater.com

Melvin J. Malone, Esq.
Paige Ayres, Esq.
Butler Snow LLP
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
melvin.malone@butlersnow.com
paige.ayers@butlersnow.com

This the 7 day of July, 2016.


Vance L. Broemel