

STATE OF TENNESSEE

Office of the Attorney General



HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

July 8, 2016

Sharla Dillon
Docket and Records Office
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Exhibits A and B to the Motion For Extension of Time to File Pre-Filed Testimony
and to Move Target Hearing Date ("Motion") in the Petition of Tennessee American
Water Company for The Reconciliation of the 2016 Capital Riders - TRA Docket No. 16-
00022

Dear Ms. Dillon:

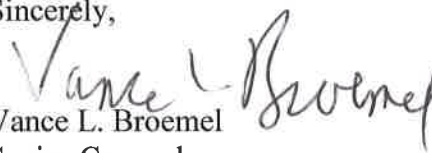
On July 7, 2016, the Tennessee Attorney General Consumer Advocate and Protection
Division filed the Motion.

The informal discovery requests referenced in the Motion as Exhibit A and Exhibit B
were inadvertently omitted from the filing.

Attached are the two informal discovery requests, described as Exhibit A and Exhibit B
in the Motion.

We apologize for any inconvenience this causes.

Sincerely,


Vance L. Broemel
Senior Counsel
(615)741-8733

cc: All parties of record

EXHIBIT A

**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

**FIRST INFORMAL DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE AMERICAN WATER COMPANY**

To: Tennessee American Water Company
C/O Melvin J. Malone, Esq.
Butler, Snow, O'Mara, Stevens & Cannada, PLLC
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201

Ms. Linda Bridwell
Manager of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502

As used herein, the "Company" refers to Tennessee American Water Company.

FIRST INFORMAL DISCOVERY REQUESTS

1. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please fully explain the difference between the "Amount" and "Adjusted Amount" fields on this spreadsheet.

RESPONSE:

2. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to column AY (Depreciation Expense) of the "WKP_2014_In-Serviced Actual" tab of this spreadsheet. The depreciation expense amounts included here appear to be hard coded numbers that do not reconcile with the previous period calculations. Please provide the source and support for the 2014 depreciation expense calculations. If the 2014 depreciation expense calculations are incorrect, please provide an updated reconciliation calculation.

RESPONSE:

3. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	12	R26-02R1.15-P-0002	E Brainerd Standpipe Rehab	12/9/2015	2602	R	330000	Det Reservoirs & Standpipes	\$ 428,553	QHP

RESPONSE:

4. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	8	R26-02C1.15-P-0001	Work Order	1A/1900	2602	C	331001	TD Main Not Classified	\$ 34,468	QHP

RESPONSE:

5. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	5	R26-02D1.15-P-0002	Kellys Ferry Road Offset	8/1/2015	2602	D	331001	TD Main Not Classified	\$ 9,466	QHP

RESPONSE:

6. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	6	R26-02B1.15-P-0013	Pipe In 4" Main Replacement	6/18/2015	2602	H	331001	TD Main Not Classified	\$ 13,543	QHP

RESPONSE:

7. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	12	R26-02H1.15-P-0001	Work Order	1/8/1900	2602	H	332000	Services	\$ 96,192	QHP

RESPONSE:

8. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost_of_removal	12	R26-02J1.15-P-0001	Work Order	1/01/200	2602	J	334200	Meter Installation	\$ 11,701	QHP

RESPONSE:

9. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost_of_removal	11	R26-02B1.15-P-0003	Standifer Rd Main Replacement	4/1/2015	2602	B	333000	Services	\$ 2,222	QHP

RESPONSE:

10. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost_of_removal	1	R26-02F1.14-P-0003	Purchase (2) 6" Wheel Valves	9/26/2014	2602	F	331001	TD Main Not Classified	\$ 883	QHP

RESPONSE:

11. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	2	R26-02A1.14-P-0002	OLAN MILLS DR 12" MAIN REL	2/1/2015	2602	A	331001	TD Main Not Classified	\$ 101,697	ED1

RESPONSE:

12. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	12	R26-02A1.13-P-0002	Obey Street Main Extension	12/3/2015	2602	A	331001	TD Main Not Classified	\$ 49,174	ED1

RESPONSE:

13. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	7	R26-02E1.15-P-0001	Work Order	1/01/2009	2602	E	335000	Hydrants	\$ 6,338	ED1

RESPONSE:

14. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab

of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	5	R26-05A1.14-P-0003	Hwy 28 I2 and 8 DI Main Extension	5/22/2015	2605	A	331001	TD Main Not Classified	\$ 268,086	ED1

RESPONSE:

15. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	5	R26-02E1.14-P-0005	RELOCATE FWH ON CHICKAMAUGA AVE @ GRA	11/7/2014	2602	E	335000	Hydramis	\$ 343	ED1

RESPONSE:

16. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	5	R26-02E1.14-P-0005	RELOCATE FWH ON CHICKAMAUGA AVE @ GRA	11/7/2014	2602	B	335000	Hydramis	\$ 86	ED1

RESPONSE:

17. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period:WBS	Description	In-Service Date	Profit center	Project # /Utility account	UA Name	Amount	Eligibility
cost_of_removal	5 R26-02B1.14-P-0005	RELOCATE PH ON CHICKAMAUGA AVE @GRA	11/7/2014	2602	E	335000 Hydrants	\$ 111	ED1

RESPONSE:

18. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period:WBS	Description	In-Service Date	Profit center	Project # /Utility account	UA Name	Amount	Eligibility
cost_of_removal	5 R26-02B1.14-P-0005	RELOCATE PH ON CHICKAMAUGA AVE @GRA	11/7/2014	2602	E	335000 Hydrants	\$ 386	ED1

RESPONSE:

19. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period:WBS	Description	In-Service Date	Profit center	Project # /Utility account	UA Name	Amount	Eligibility
ADDITION	7 R26-02Q1.15-P-0007	Replace Underdrain 9 in Filter Rise	7/9/2015	2602	Q	320100 W T Equip Non-Media	\$ 95,306	SEC

RESPONSE:

20. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period:WBS	Description	In-Service Date	Profit center	Project # /Utility account	UA Name	Amount	Eligibility
ADDITION	4 R26-02Q1.15-P-0012	Repl #11 H.S. Motor & Coupling	4/21/2015	2602	Q	311520 Pumping Equipment-Source of Supp	\$ 120,515	SEC

RESPONSE:

21. Refer to the spreadsheet titled “TAW_TRA_2015_CapRider_Recon_0301162” that was included with the Company’s filing. Specifically refer to the “WKP_2015_Actuals” tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company’s Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	7	R26-02/Q1.15-P-0013	Gate	7/20/2015	2602	Q	311520 Pumping Equipment-Source of Supp		\$ 16,476	SEC

RESPONSE:

22. Refer to the spreadsheet titled “TAW_TRA_2015_CapRider_Recon_0301162” that was included with the Company’s filing. Specifically refer to the “WKP_2015_Actuals” tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company’s Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
ADDITION	4	R26-02/Q1.14-P-0039	Replace VFD @ Crestwood	4/1/2015	2602	Q	311520 Pumping Equipment-Source of Supp		\$ 4,450	SEC

RESPONSE:

23. Refer to the spreadsheet titled “TAW_TRA_2015_CapRider_Recon_0301162” that was included with the Company’s filing. Specifically refer to the “WKP_2015_Actuals” tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company’s Capital Rider.

Type	Period	WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	9	R26-02/Q1.15-P-0018	Refurb Filter Underdrains #6 #3 #7	4/30/2015	2602	Q	320260 WT Equip Filter Media		\$ 75,833	SEC

RESPONSE:

24. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period/WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	10 R26-02L114-P-0003	UPGRADE COMMUNICATIONS EQUIPMENT FO	11/14/2014	2602	L	346190	Reserve Control & Instrument	\$ 212	SEC

RESPONSE:

25. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period/WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	3 R26-03Q114-P-0005	RET Old Filter Plant - Whistell	7/14/2014	2602	Q	304200	Struct & Imp-Pumping	\$ 10,440	SEC

RESPONSE:

26. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_0301162" that was included with the Company's filing. Specifically refer to the "WKP_2015_Actuals" tab of this spreadsheet. Please provide the source and support related to the following charge for 2015 included in the Company's Capital Rider.

Type	Period/WBS	Description	In-Service Date	Profit center	Project #	Utility account	UA Name	Amount	Eligibility
cost of removal	9 R26-03Q115-P-0018	Rehab Filter Underdrains #8 #7	4/30/2015	2602	Q	320100	WT Equip Non-Media	\$ 17,927	SEC

RESPONSE:

RESPECTFULLY SUBMITTED,



VANCE L. BROMEL (BPR #11421)

Assistant Attorney General

Office of the Attorney General

Consumer Protection and Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

615-741-8733

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 5 day of July, 2016.

Vance L. Broemel
VANCE L. BROEMEL

EXHIBIT B

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

PETITION OF TENNESSEE-AMERICAN)	
WATER COMPANY REGARDING)	
CHANGES TO THE QUALIFIED)	
INFRASTRUCTURE INVESTMENT)	
PROGRAM RIDER, THE ECONOMIC)	Docket No. 16-00022
DEVELOPMENT INVESTMENT RIDER,)	
AND THE SAFETY AND)	
ENVIRONMENTAL COMPLIANCE)	
RIDER AND IN SUPPORT OF THE)	
CALCULATION OF THE 2016 CAPITAL)	
RIDERS RECONCILIATION)	

**SECOND INFORMAL DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE AMERICAN WATER COMPANY**

To: Tennessee American Water Company
C/O Melvin J. Malone, Esq.
Butler, Snow, O'Mara, Stevens & Cannada, PLLC
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201

Ms. Linda Bridwell
Manager of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502

As used herein, the "Company" refers to Tennessee American Water Company.

SECOND INFORMAL DISCOVERY REQUESTS

1. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_030116" that was included with the Company's filing. Specifically refer to the "WKP-SAP Revenues" tab of this spreadsheet. Please provide the source and support for the hard-coded data included on this spreadsheet.

RESPONSE:

2. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_030116" that was included with the Company's filing. Specifically refer to the "WKP-Whitwell Revenues" tab of this spreadsheet. Please provide the source and support for the hard-coded data (column B) included on this spreadsheet.

RESPONSE:

3. Refer to the spreadsheet titled "TAW_TRA_2015_CapRider_Recon_030116" that was included with the Company's filing. Specifically refer to the "Exhibit Reconciliation" tab of this spreadsheet. Please provide the source and support for the "2014 Reconciliation Amounts" included on line 14 of this spreadsheet.

RESPONSE:

4. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "Recon" tab of this spreadsheet. Please provide the source and support for the hard-coded data included on this spreadsheet.

RESPONSE:

5. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "Recon" tab of this spreadsheet. Please provide a legend for the "G/L Account" numbers used in column A of this spreadsheet.

RESPONSE:

6. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "Recon" tab of this spreadsheet. Please provide a legend for the "Posting Period Rate Number" data used in column B of this spreadsheet.

RESPONSE:

7. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "Recon" tab of this spreadsheet. Please provide a legend for the "Rider" data used in column C of this spreadsheet.

RESPONSE:

8. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "Recon" tab of this spreadsheet. Please explain and reconcile the differences shown in column R between the totals in this report and the "SAP F.01" report included on another tab in this same spreadsheet.

RESPONSE:

9. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "SAP F.01" tab of this spreadsheet. Please provide the source and support for the hard-coded data included on this spreadsheet.

RESPONSE:


10. Refer to the spreadsheet titled "TAW_TRA_2015_Revenues_030116" that was included with the Company's filing. Specifically refer to the "SAP F.01" tab of this spreadsheet. Please provide a legend for the "Financial Statement Item" data used in column A of this spreadsheet.

RESPONSE:

11. Please provide a copy of all Company workpapers that the Company has relied upon in its Capital Reconciliation Filing that have not yet been included in this docket.

RESPONSE:

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink that reads "Vance L. Bromel". The signature is written in a cursive style with a horizontal line underneath the name.

VANCE L. BROMEL (BPR #11421)
Assistant Attorney General
Office of the Attorney General
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
615-741-8733

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