

**IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION OF TENNESSEE AMERICAN  
WATER COMPANY REGARDING THE  
2016 INVESTMENT AND RELATED  
EXPENSES UNDER THE QUALIFIED  
INFRASTRUCTURE INVESTMENT  
PROGRAM RIDER, THE ECONOMIC  
DEVELOPMENT INVESTMENT RIDER,  
AND THE SAFETY AND ENVIRONMENTAL  
COMPLIANCE RIDER**

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**Docket No. 16-00126**

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**MOTION FOR LEAVE TO ISSUE MORE THAN FORTY DISCOVERY REQUESTS**

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The Consumer Protection and Advocate Division of the Office of the Attorney General (“Consumer Advocate”), pursuant to TRA Rule 1220-1-2-.11(5)(a), hereby submits this motion requesting permission to issue more than forty discovery requests to Tennessee American Water Company. Pursuant to TRA Rule 12-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests as well as the discovery requests themselves.

RESPECTFULLY SUBMITTED



DANIEL P. WHITAKER III, BPR #035410  
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Office of the Attorney General  
Consumer Protection and Advocate Division  
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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:

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

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This the 6 day of January, 2017.

  
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DANIEL P. WHITAKER III