

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

IN RE: )  
)  
PETITION OF TENNESSEE AMERICAN )  
WATER COMPANY REGARDING THE ) **Docket No. 16-00126**  
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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**SECOND SUPPLEMENTAL DISCOVERY REQUEST OF THE  
CONSUMER PROTECTION AND ADVOCATE DIVISION TO  
TENNESSEE AMERICAN WATER COMPANY**

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To: Tennessee American Water Company  
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Linda Bridwell  
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This Supplemental Discovery Request is hereby served upon Tennessee American Water Company (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. This Second Supplemental Discovery Request is being filed in response to the certification filed by Valoria Armstrong on behalf of the

Company (Certification). The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Protection and Advocate Division, 315 Deaderick Street, 20<sup>th</sup> Floor, Nashville, Tennessee 37243, c/o Daniel P. Whitaker III, on or before 4:00 p.m. (CDT), February 1, 2017.

### **PRELIMINARY MATTERS AND DEFINITIONS**

These Additional Discovery Requests incorporate the same Preliminary Matters and Definitions as set forth in the *Informal Discovery Request of the Consumer Advocate and Protection Division to Tennessee American Water Company* sent to Tennessee American Water Company on December 6, 2016, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

### **SUPPLEMENTAL DISCOVERY REQUESTS**

3-1. Identify Valoria Armstrong's position within the Company, including a detailed description of her role(s) within the Company, and provide her complete background information, including her educational, professional and employment history, and financial and other qualifications to execute the Certificate. Also state whether Ms. Armstrong is an officer of the Company and if so, provide a Company secretary's certificate that confirms her title and position as an officer of the Company.

**RESPONSE:**

3-2. State whether the Company believes there is any difference between a verification as required by the tariff and the certification as provided by the Company. If the Company believes there is any difference, explain any such difference fully and with specificity.

**RESPONSE:**

3-3. Identify any other docket or proceeding in which Valoria Armstrong has provided a certificate or verification, or has testified (through deposition or otherwise), and provide the docket or proceeding number and forum of each such docket or proceeding, the date(s) of the certificate or verification or prior testimony and the subject of the certificate or verification or prior testimony, and provide a copy of each such certificate or verification, and the transcripts of any such testimony.

**RESPONSE:**

3-4. Describe the process, in detail and with specificity, by which Ms. Armstrong reviewed, approved, and executed the Certificate, including:

- (a) On what date did Ms. Armstrong's review of the Certificate begin?
- (b) On what date did Ms. Armstrong approve the Certificate?
- (c) What steps did Ms. Armstrong take to verify the completeness of the Certificate?
- (d) What steps did Ms. Armstrong take to verify the accuracy of the Certificate?
- (e) Identify each person with whom Ms. Armstrong consulted in her review, approval, and execution of the Certificate.
- (f) Identify each person upon whom Ms. Armstrong relied in her review, approval, and execution of the Certificate.

(g) State in detail with specificity the Company's financial and other books and records that were reviewed and/or relied upon by Ms. Armstrong in her approval and execution of the Certificate, and either (i) provide specific reference(s) to those records as they have been provided in discovery provided to this point or (ii) to the extent those books and records have not provided, provide them.

(h) State in detail with specificity any analysis performed by Ms. Armstrong on the Company's financial and other books and records that was used in Ms. Armstrong's approval and execution of the Certificate.

**RESPONSE:**

3-5. Except to the extent not otherwise referenced or provided in discovery requests in this Supplemental Request, produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by Ms. Armstrong and all other individuals with whom she consulted or upon whom she relied in evaluating, reaching conclusions or formulating an opinion in the Certificate.

**RESPONSE:**

3-6. Admit or deny that the Certificate filed by Ms. Armstrong is an attestation from the Company's controller of the Capital Riders percentages and the underlying accounting as requested in the supplemental discovery request no. 4, subpart d. If not, state when the Company expects to file the proper verification. If this certification is intended to serve as the referenced

attestation, provide a verification that these percentages and the underlying accounting relate back to the Company's General Ledger.

**RESPONSE:**

3-7. Admit or deny that the Certificate filed by Valoria Armstrong is an attestation from the Company's controller of the Capital Riders percentages and the underlying accounting as requested in the supplemental discovery request no. 19, subpart d. If not, state when the Company expects to file the proper verification. If this certification is intended to serve as the referenced attestation, provide a verification that these percentages and the underlying accounting relate back to the Company's General Ledger.

**RESPONSE:**

3-8. State whether the Company believes there is a difference between the verification requirement in the tariff and the attestation from the supplemental discovery requests referenced in Items 3-6 and 3-7. If the Company does believe that there is a difference, please provide an explanation of the difference in detail and with specificity.

**RESPONSE:**

3-9. If the certification filed by Valoria Armstrong is the verification by a corporate officer as required by the tariff, provide copies of all of the underlying accounting that Ms. Armstrong is verifying.

**RESPONSE:**

3-10. Provide verification that the Capital Riders percentages and the underlying accounting relate back to the Company's General Ledger. If any items do not relate back to the Company's General Ledger, identify these items that do not relate back and provide an explanation for why each item differs from the Company's General Ledger.

**RESPONSE:**

3-11. If applicable, admit or deny that Ms. Armstrong and any individuals identified in Item 3-4 will be present at all hearings regarding this docket. If these individuals will not be present at all hearings relating to this docket, explain in detail the basis for such individual not attending and provide an explanation for why the individuals should not be required to attend.

**RESPONSE:**

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:

Linda Bridwell  
Manager of Rates and Regulation – Tennessee and Kentucky  
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This the 26 day of January, 2017.



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Daniel P. Whitaker III  
Assistant Attorney General