

TENNESSEE PUBLIC UTILITY COMMISSION



502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

June 9, 2017

Karen h. Stachowski
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Consumer Protection and Advocate Division
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VIA E-MAIL and U.S. MAIL

RE: *In re: Petition of Tennessee Wastewater Systems, Inc. ("TWSI") For Approval Of Adjustment Of Its Rates And New Tariff*, Docket No. 16-00139

Dear Ms. Stachowski:

In order to assist the Authority in its investigation of the above-captioned matter, it is requested that responses be provided to the questions contained in the attached data request.

Pursuant to TRA Rule 1220-1-1-.03(4), submit either an electronic response along with an original and four (4) written copies or an original written response and thirteen (13) copies. Also, please note that the requisite number of written copies of all requested information must be provided to the Docket Manager and electronic responses, if filed, must be in .pdf format. Any excel spreadsheets must be submitted electronically with formulas.

It is requested that all information be provided no later than 2 PM, Tuesday, June 20, 2017, and that Docket No. 16-00139 be referenced on the response. Should you have questions regarding the attached request, please contact David Foster at (615) 770-6884.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Foster".

David Foster
Director, Utilities Division

Attachment (1)

TRA DATA REQUEST: (Reference the testimony of William H. Novak)

1. Provide the exact source (cite) for the number of bills for 2016 used on WP-8.
2. Provide any growth or inflation factor used on WP-8 and how it was determined.
3. Provide the exact source (cite) for the number of bills for 2016 used on WP-9.
4. Were the Commercial Revenues of \$1,076,425.57 calculated on WP-9 a historical or grown/inflated amount? If historical for what time period? If grown or inflated, what factor was used and how was it determined?
5. Provide the exact source (if the amount is a combination provide the calculations arriving at the amount on WP-3) for the amounts for 2016 on WP-3, lines 4 and 8.
6. Was the amount for Contractual Services Expense for the 2016 attrition period on WP-3 grown or adjusted for inflation? If it was not, please explain, and if so what was the factor and how was it determined?
7. Provide the exact source (if the amount is a combination provide the calculations arriving at the amount on WP-4) for the amounts for 2016 on WP-4, lines 1, 2, 6, 7, and 9.
8. Were the amounts on WP-4 for the 2016 attrition year grown or inflated? If they were not please explain, and if so please provide the factor and how it was determined.
9. Provide the exact source (if the amount is a combination provide the calculations arriving at the amount on WP-5) for the amounts for 2016 on WP-5, line 6.
10. Provide the exact source, cite and/or calculations for the "Attr. Period Adjustments" column on Schedules 3 through 9.
11. On pages 11 and 12 of Mr. Novak's testimony when discussing the "recasting", "change in operating structure"; and "going-level of expenses for setting rates" he states "As a result, I do not have the same level of confidence in the methodology used for setting rates in this case as I discuss later in my testimony." Please provide the reference in his testimony where he discusses these changes in methodology and his level of confidence related to these changes.