TENNESSEE REGULATORY AUTHORITY

502 Deaderick Street, 4th Floor Nashville, Tennessee 37243

February 2, 2017

Jeff Risden, Esq.
General Counsel
Tennessee Wastewater Systems, Inc.
851 Aviation Parkway
Smyrna, TN 37167
Jeff.risden@adenus.com

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 Mr. Risden:

To assist the Authority in its evaluation of the above-captioned *Petition* filed on November 29, 2016, it is requested that Tennessee Wastewater Systems, Inc. provide responses to the attached TRA Data Request.

It is requested that all responses be provided no later than 2:00 p.m. February 14, 2017. In accordance with TRA rules, submit either (1) original and thirteen written copies of your response or (1) original and four written copies and an electronic version. Should you have any questions or need clarification regarding any requested item, please contact me at (615) 770-6884.

Sincerely,

David Foster, Chief Utilities Division

cc: Henry M. Walker, Esq., Karen H. Stachowski Office of Attorney General, Docket File

TRA DATA REQUEST

- 1. Provide a price out for all revenues (residential, commercial with food, commercial without food, cabins, capacity reservation, escrow, disconnection, reconnection, convenience fee, non-payment, returned check and decline fees, etc.) by month for the twelve months ending December 31, 2015 as listed on Exhibit 2. (excel format)
- 2. Provide a price out for all salaries and wages for employees and officers by month for the twelve months ending December 31, 2015 as listed on Exhibit 2. This should include wage amount or salary and associated benefits. (excel format)
- 3. Provide worksheets detailing the individual amounts included within each category for all Operation expenses by month for the twelve months ending December 31, 2015 as listed on Exhibit 2. (excel format)
- 4. Provide excel workpapers demonstrating the proposed monthly rates included in No. 9 of the Petition will generate a 20% increase as stated in the Petition.
- 5. Please explain and provide supporting workpapers demonstrating how TWSI arrived at the \$0.358 per sketched square footage charge for cabins. Define "sketched". Provide a copy of the "research" referred to by Mr. Hyatt in his testimony regarding the square footage of a cabin is more indicative of its capacity.
- 6. Please define "excessive" as used in Section 8 Cabin Rates Sheet tariff. Please explain why TWSI believes the \$0.358 per sketched square footage charge may not be sufficient and the excessive terms are necessary.
- 7. Provide a copy of your analysis used to determine that the new rate structure for cabins will have minimal impact on smaller cabin owners that do not rent or otherwise make their cabins commercially available.
- 8. Please explain how the \$6,000 Capital Capacity charge for Williamson County was determined. Provide all supporting workpapers demonstrating this amount is sufficient to cover all costs.
- 9. Please explain why the \$6,000 Capital Capacity charge is only necessary for Williamson County.
- 10. Explain what is meant by the term "used to seed TWSI's capital account".

- 11. Please explain how you arrived at the \$25.60 contained in the tariff on Section 4, Page 2, Rate Class 10 (37.18 + 2.64 + 25.60 + 2.67 + 1.21).
- 12. Provide a detailed list of all the Company's affiliated party transactions by month for the years 2014, 2015 and 2016, including the nature and amount of each transaction.
- 13. Provide a list of outside professional services provided to the Company by month for the past two (2) years (2015 and 2016), showing the nature of each service and the total charge for each service.
- 14. Provide rationale and justification for requesting a return on net revenues rather than a return on Net Margin.