

STATE OF TENNESSEE

Office of the Attorney General



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Re: Tennessee Public Utility Commission, Docket No. 17-00014, *Petition of Integra Water Tennessee, LLC for a Certificate of Public Convenience and Necessity and Authority to Charge Rates in Casey Cove Subdivision Located in Dekalb County, Tennessee*

Dear Mr. Gastel:

The Consumer Advocate is seeking clarification on a number of Tennessee Water's responses to the Consumer Advocate's discovery requests:

- **Request 2-17.** Integra provided no response to 2-17d in which the Consumer Advocate requested an explanation of how the New Account Fee is "calculated and determined". The Consumer Advocate requested the basis and support for this fee. Please provide a response to 2-17d.
- **Request 2-22.** Integra provided no response to 2-22a-b in which the Consumer Advocate requested an explanation for the change in the late fee from 1% to 10%, a list of late fees Integra assesses in other states and explanation for the differences of late fees between states. Please provide a response to 2-22a-b.

- **Request 2-23.** Integra provided no response to 2-23a-c in which the Consumer Advocate requested an explanation of how Integra calculated and determined the 1% late penalty charge in the Initial Petition and the 10% penalty charge in the Second Amended Petition and Amended Tariff. Further, the Consumer Advocate requested the basis and support of the late penalty charge of 10% in Tennessee and 1% in North Carolina. . Please provide a response to 2-22a-c.
- **Request 2-25.** Integra states that it appears this request is the same as CPAD #2-17. The Consumer advocate agrees there is one duplication in 2-17 and 2-25 and it is the request on how the fee is “calculated and determined” and the request for the basis and support for the fee. The Consumer Advocate apologizes for any confusion this duplication may have caused. However, Integra provided no response to this specific request in 2-17d and provides no response in 2-25a. Additionally under 2-25, the Consumer Advocate requested Integra to identify other states that it assesses this New Account Fee, the fees in each of those states, and an explanation of the difference in this fee between the states. Integra has provided no responses to these requests. Please provide a response to 2-25b-c. If Integra provides a response to 2-17d, it does not need to duplicate the response in 2-25a.

The Consumer Advocate seeks clarification of whether the New Account Fee listed in the Initial Petition at Addendum 1, #19 the same as the “Application Fee” of \$20 listed in the Amended Tariff Attachment to Integra’s Response to the Consumer Advocate’s Discovery Request? The Consumer Advocate is seeking clarification since different terminology is being used for a \$20 fee.

This is the first letter seeking clarification to Integra’s responses. Thank you for your time and attention to this request for clarification. If you have any questions, please feel free to reach out to me.

Sincerely,



Karen H. Stachowski  
Assistant Attorney General

cc: TPUC Docket No. 17-00108