## IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

IN RE:	)	
	)	
PETITION OF TENNESSEE AMERICAN	)	
WATER COMPANY REGARDING	)	
CHANGES TO THE QUALIFIED	)	
INFRASTRUCTURE INVESTMENT	)	Docket No. 17-00020
PROGRAM RIDER, THE ECONOMIC	)	
DEVELOPMENT INVESTMENT RIDER,	)	
AND THE SAFETY AND	)	
ENVIRONMENTAL COMPLIANCE RIDER	)	
AND IN SUPPORT OF THE CALCULATION	)	
OF THE 2017 CAPITAL RECOVERY	)	
RIDERS RECONCILIATION	)	

# SECOND DISCOVERY REQUEST OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION TO TENNESSEE AMERICAN WATER COMPANY

To: Melvin J. Malone
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This Second Discovery Request is hereby served upon Tennessee-American Water Company (TAWC), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. 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), Friday, June 2, 2017.

## PRELIMINARY MATTERS AND DEFINITIONS

These additional discovery requests incorporate the same Preliminary Matters and Definitions set forth in the *Informal First Discovery Request of the Consumer Protection and Advocate Division to Tennessee American Water Company* filed April 21, 2017 (*First Discovery Request*), and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by TAWC and any TAWC affiliate which would make a prior response inaccurate, incomplete, or incorrect.

## SECOND DISCOVERY REQUESTS

2-1. Refer to the Company's response to CPAD1-2 regarding the support for the monthly revenue amounts and specifically refer to the supporting spreadsheet titled "TAW\_R\_CPADDR1\_002\_050517\_Attachment" at the "GL Transactions" tab. Modify the data provided in the "GL Transactions" tab to include the corresponding rate number for each of the line items provided.

#### **RESPONSE:**

2-2. Refer to part B of the Company's response to CPAD1-3 regarding the SAP revenue document types. In the second sentence of the response, the Company states that "UC document types are excluded" from the "cost\_of\_removal" calculation. However, it appears that "UC" document types are included in the calculation but rather "UD" document types are excluded. Confirm that the reference to UC document types in this sentence is a typo and that

the sentence should instead refer to UD document types. If this is not the case, explain why UC document types have been included in the "cost\_of\_removal" calculation.

#### **RESPONSE:**

2-3. Refer to the Company's response to CPAD1-5 regarding the capitalization of incentive compensation. Provide supporting general ledger documentation for the \$12,908 of capitalized performance plan expenditures for 2016.

#### **RESPONSE:**

- 2-4. Refer to the Company's response to CPAD1-9 regarding the process for determining the eligibility of work orders for the Capital Rider Surcharge. The Company stated in its response that all work orders under specific project numbers are reviewed to determine whether they are appropriate for inclusion in the Capital Rider Surcharge. Provide a general description of this review process. Specifically, include as follows:
  - A. Identify the individuals who perform the review;
  - B. State when the review takes place;
  - C. List any instructions and/or guidelines and produce any other information provided to the reviewers;
  - D. Itemize the differences in the review process between each capital rider; and
  - E. List the consideration of materiality threshold amounts.

#### **RESPONSE:**

- 2-5. Refer to the Company's response to CPAD1-11 regarding support for the financials included in the calculation of the Earnings Test and provide the following information:
  - A. In response to the initial data request, the Company provided the monthly balance sheets used in its filings to the TPUC. Provide supporting general ledger documentation from SAP for the monthly income statements and balance sheets.

- B. Provide the source and support for the Accumulated Deferred Income Taxes (*i.e.*, itemize this line item to show the Accumulated Deferred Income Taxes separately from the other regulatory liabilities that have been included).
- C. Refer to the spreadsheet titled "12 TAW\_TRA\_2016\_Workpaper\_Earnings Test" and specifically, to the "Workpaper Earnings Test" tab. Provide the source and support from the settlement in the Company's last rate case (Docket No. 12-00049) for the individual components of the calculation of Working Capital (lines 63-69). It appears that the Company is not using the same numbers outlined in the settlement. If this calculation was made in error, then provide new schedules and update the Earnings Test calculation accordingly.
- D. Refer to the spreadsheet titled "12 TAW\_TRA\_2016\_Workpaper\_Earnings Test" and specifically, to lines 52-59 of the "Workpaper Earnings Test" tab. Provide the source and support for the individual line items included in the calculation of the "All Other" line, and including:
  - i. "Acquisition adjustment",
  - ii. "Accounts payable applicable to CWIP",
  - iii. "Unpaid materials and supplies", and
  - iv. "Taxes on CIAC-DEF . FIT & SIT").

#### **RESPONSE:**

2-6. Refer to the Company's response to CPAD1-14 regarding the calculation of the "Over-Under Collection Adjustment." Provide a status update to this response regarding TAWC's review of the tariff requirements as noted in CPAD1-14E.

#### **RESPONSE:**

- 2-7. Refer to the spreadsheet titled "10 TAW\_TRA\_2016\_CapRider\_Recon" at line 26 of the "Exhibit Reconciliation" tab of the spreadsheet in the Company's filings.
  - A. Is it correct that the Earnings Test Adjustment in line 26 has been allocated to the individual capital riders based on the pro-rata pre-tax return on additions (line 9 of the "Exhibit Reconciliation" tab)?
  - B. Per the Tariff, the "Earnings Test Adjustment shall be allocated among the Qualified Infrastructure Improvement Program Rider, the Economic Development Investment Rider, and the Safety and Environmental Compliance Rider based on

the pro-rata revenues collected under these riders for the Annual Review Period for purposes of computing new rate adjustments." Is this how you calculated the "Earnings Test Adjustment" for each individual Capital Rider?

- C. If not, explain in detail with specificity how you calculated the "Earnings Test Adjustment".
- D. Provide the Company's reasons for calculating the "Earnings Test Adjustment" using pre-tax return on additions instead of revenues collected.
- E. If this calculation was in error, provide an updated reconciliation calculation.

#### **RESPONSE:**

- 2-8. Refer to the spreadsheet titled "10 TAW\_TRA\_2016\_CapRider\_Recon" at line 25 of the "Exhibit Reconciliation" tab of the spreadsheet in the Company's filings.
  - A. Per the Tariff, the "Annual Reconciliation Factor Percentage Rate will be computed as follows:

Budget-Actual Adjustment
Plus Over/Under Collection Adjustment
Plus Earnings Test Adjustment

<u>Plus Interest</u>

Annual Reconciliation Amount

Divided by 9/12 of the Relevant Rate Order Volumetric & Metered Revenue"

Is this how you calculated the "Annual Reconciliation Factor Percentage Rate"?

- B. If not, explain in detail with specificity how you calculated the "Annual Reconciliation Factor Percentage Rate".
- C. Provide the Company's rationale for including the "2015 Reconciliation Amount" (line 25) in the calculation of the "Annual Reconciliation Factor Percentage Rate".
- D. If this calculation was in error, provide an updated reconciliation calculation.

#### **RESPONSE:**

2-9. Refer to the Company's Response to CPAD15-A regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of

\$164,944.88 and specifically to the page titled "Cost Summary Related to Work Order #I26-020028-01" (page 1 of 3) which indicates the following cost categories make up the total charge.

Tennessee-American Water Company Oodert #17-00020 Response to TAW\_R\_CPADDR1\_015 Cost Summary Related to Work Order #126-020028-01

Work Order	G/L Account	G/L Account Name	Utility Account	Utility Account Name	Amount
126-020028-01	10630430	CCNC Struct & Imp - Water Treatment	304300	Struct & Imp-Treatment	5132,800.91
126-020028-01	10632010	OCNC - Water Treatment Equipment - Non-Media	320100	WT Equip Non-Media	44,266.97
		u u			\$177,067.88
Work Order		General Cost Type	General Cost Description		Amount
126-020028-01		Labor	Labor & Related Costs		\$6,127.54
		Inventory	Materials Issued from Inven-	tory	0.00
		Invoices	Contracted Services & Non-I	investment Materials	226 166 00
		Involves.			
		AFUDC	Allowance for Funds Used D	····	0.00
				uring Construction	

From recon file "TAW\_TRA\_2016\_CapRider\_Recon" and tab "WKP\_2016\_Actuals". Source: Powerplant

Provide the "General Cost Type" components and amounts for "CCNC Struct & Imp – Water Treatment" that total \$132,800.91 and the "CCNC Struct & Imp – Water Treatment Equipment – Non-Media" that total to \$44,266.97.

## **RESPONSE:**

2-10. Refer to the Company's Response to CPAD15-C regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$15,267.71 and specifically to the page titled "Cost Summary Related to Work Order #R26-02B1.15-P-0015" (page 1 of 3) which indicates the following cost categories make up the total charge.

Tennessee-American Water Company
Docket 817-0020
Response to TAW\_R\_CPADDR1\_015
Cost Summary Related to Work Order #R26-02B1.15-P-0015

Work Order	G/L Account	G/L Account Name	Utility Account	Utility Account Name	Amount
R26-02B1.15-P-0015	10633100	CCNC - Transmssn & Distr Mains Not Classified	331001	TO Mains Not Classified	\$15,267.71
R26-0281.15-P-0015	10633300	CCNC Services	333000	Services	320.13
R26-02B1 15-P-0015	25710000	Reg Liab - Cost of Removal RWIP			489.16
					\$16,077.00
Work Order		General Cost Type	General Cost Description		Amount
R26-0281_15-P-0015	-	Labor	Labor & Related Costs		\$0.00
NET OLD 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Inventory	Materials Issued from Inver	itory	
		Invoices	Contracted Services & Non-	Inventory Materials	16,077.00
		AFUDC	Allowance for Funds Used D	Juring Construction	0,00
		Overhead	Indirect Overhead		0.00
					\$16,077.00

Provide the "General Cost Type" components and amounts for "CCNC – Transmssn & Distr Mains Not Classified" that total \$15,267.71, the "CCNC Services" that total \$320.13 and the "Reg Liab – Cost of Removal RWIP" that total \$489.16.

## **RESPONSE:**

2-11. Refer to the Company's Response to CPAD15-C regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$19,892.83 and specifically to the page titled "Cost Summary Related to Work Order #R26-05J1.15-P-0001" (page 1 of 3) which indicates the following cost categories make up the total charge.

Tennessee-American Winter Company
Docket #17-00026
Response to TAW\_R\_CPADDR1\_015
Cost Summary Related to Work Order #R26-0531.15-P-0001

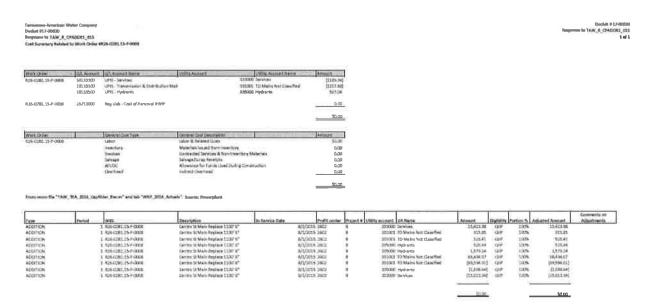
Work Orger	G/L Account	G/L Account Name	Utility Account	Utility Account Name	Amount
R16-05J1.15-P-0001	10633420	CONC Meter installations	33420	XX Mater Installations	519,892.83
R26-05/1.15-P-0001	25710000	Reg Lisb - Cost of Removal RWIP			2,381.06
					<u>\$22.273.89</u>
Work Order		General Cost Type	General Cost Description		Amount
A THE PARTY OF THE		General Cost Type Labor	General Cost Description Labor & Related Costs		Amount \$10,038,47
				bory	
A THE PARTY OF THE		Labor	Labor & Related Costs		\$10,038,47
Work Order 826-03J1.13-P-0001		Labor	Lation & Related Costs Materials Issued from Invent		\$10,038,47 4,299,52
A THE PARTY OF THE		Labor Inventory Invoices	Lation & Related Costs Materials Issued from Invent Contracted Services & Non-II	rentory Materials	\$10,038.47 4,299.52 8,282.07
A THE PARTY OF THE		Labor Inventory Invoices Salvage	Labor & Related Costs Materials Issued from Invent Contracted Senrices & Non-ti Salvage/Scrap Receipts	rentory Materials	\$10,038,47 4,299,52 6,232.07 (2,294,88)

From recon file "TAW TRA 2016 CauRider Recon" and tab "WKP 2015 Actuals", Source: Powerplant

Provide the "General Cost Type" components and amounts for "CCNC Meter Installation" that total \$19,892.83 and the "Reg Liab – Cost of Removal RWIP" that total to \$2,381.06.

## **RESPONSE:**

2-12. Refer to the Company's Response to CPAD15-D regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$1,579.24 and specifically to the page titled "Cost Summary Related to Work Order #R26-02B1.15-P-0008" (page 1 of 1).

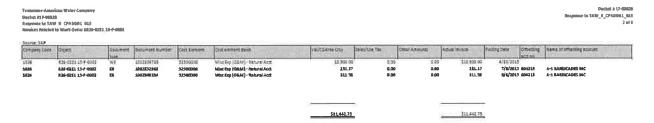


Provide a narrative response as to why this charge along with other charges relating to Work Order #R26-02B1.15-P-0008 were reversed.

## **RESPONSE:**

2-13. Refer to the Company's Response to CPAD15-E regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$16,494.19 and specifically to the page titled "Invoices Related to Work Order #R26-02E1.15-P-

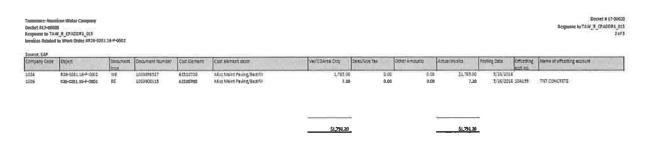
0002" (page 2 of 3) which indicates the following invoices are the support for the ledger amount requested for recovery.



Provide a narrative response as to why the invoices referenced as support only total \$11,442.75 while the ledger charge is for \$16,494.19, a difference of \$5,051.44.

## **RESPONSE:**

2-14. Refer to the Company's Response to CPAD15-F regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$6,097.59 and specifically to the page titled "Invoices Related to Work Order #R26-02E1.16-P-0002" (page 2 of 3) which indicates the following invoices are the support for the ledger amount requested for recovery.



Provide a narrative response as to why the invoices referenced as support only total \$1,792.20 while the ledger charge is for \$6,097.59, a difference of \$4,305.39

## **RESPONSE:**

2-15. Refer to the Company's Response to CPAD15-G regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$18,010.44 and specifically to the page titled "Cost Summary Related to Work Order #R26-

05A1.15-P-0002" (page 1 of 3) which indicates the following cost categories make up the total charge.

Tennessee-American Water Company Docket #37-08020 Response to TAW IR CPADONS 1915 Cost Swampany Methold to Work Order HILZE-95.A1. 15-P-0002

Work Order	GA Account	GA: Account Name	Unity Account	Utility Account Name	Amount
R26-03A1.13-P-0002	10633100	CONC - Treasmosan & Distr Mains Not Classified	331001	TD Mains Not Classified	\$26,175.19
	10633500	ECMC Hydrants	330000	Hydrants	1,440.83
	10633410	GCMC Meters	334300	Meter Veults	18,010.44
R24-03A1.13-F-0002	25710000	Reg Linb - Cost of Removal RV/IF			
					\$45,626.46
Worll Order	Ti and the second	General Cost Type	General Cost Description		Amount
Work Order R26-05A1,13-P-0002	li i	General Cost Type Labor	General Cost Description Labor & Related Costs		
				עי	\$0.00 0.00
	li i	Labor	Labor & Related Costs		\$0.00
	I -	guinalizad.	Labor & Related Costs Materials Issued from Inventor		\$0.00
		Labor fruentmy finesices	Lavor & Related Costs Ministerials Issued From Enventor Contracted Services & Non-Inc	entory Materials	\$0.00 0.00 42,258.30
	li-	Labor Invertory Invertors Salvage	Lation & Related Costs Makerials Issued from Inventor Contracted Services & Non-Inv Salvage/Scrap Receipts	entory Materials	\$0.00 0.00 42,256.30 0.00

From recon file "TAW\_TRA\_2015\_CapRider\_Recon" and tan "WRP\_2016\_Actuals". Source: Powerplant

Provide the "General Cost Type" components and amounts for "CCNC – Transmssn & Distr Mains Not Classified" that total \$26,175.19, the "CCNC Hydrants" that total to \$1,440.33, and the "CCNC Meters" that total to \$18,010.44.

## **RESPONSE:**

2-16. Refer to the Company's Response to CPAD15-H regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$2,404.64 and specifically to the page titled "Cost Summary Related to Work Order #R26-02A1.15-P-0005" (page 1 of 3) which indicate the following cost categories make up the total charge.

Work Order	G/L Account	G/L Account Name	Littlity Account	Utility Account Name	Amount
R26-D2A1.13-P-0003	10633100	CCNC - Transmissi & Distr Mains Not Classified	3310	OL TD Mains Not Classified	\$13,844.28
	10633300	CCNC - Hydrants	3300	30 Hydrants	3,130.77
R26-02A1.13-F-0005	2573.0000	Reg Lisb - Cost of Removal RWIP			0.00
					\$16,935.05
Work Order		General Cost Type	General Cost Description	<b>V</b>	Amount
Work Order 826-02A1.15-F-0005		General Cost Type Labor	General Cost Description Labor & Related Costs		Amount \$20.25
				torny	
		Labor	Labor & Related Costs		\$20.25
		Enter Inventory	Labor & Related Costs Makerials Issued from Invent		\$20.25 2,618.85
		Esbor Inventory Invoices	Labor & Related Costs Materials assed from Invent Contracted Services & Mon-li	nventory Muterials	\$20.25 2,618.85 10,212.00
		Estar Invoices Salvage	Labor & Releted Costs Materials tossed from Invent Contracted Services & Non-I Salvage/Scrap Receipts	nventory Materials uring Construction	\$20.25 2,618.85 10,212.00 0.00

From recon like "TAW TRA 2016 Capitider Recon" and tab "MKP 2016 Actuals". Source: Powerplant

Provide the "General Cost Type" components and amounts for "CCNC – Transmssn & Distr Mains Not Classified" that total \$13,844.28 and the "Hydrants" that total to \$3,150.77.

#### **RESPONSE:**

2-17. Refer to the Company's Response to CPAD15-I regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$27,094.36 and specifically to the page titled "Cost Summary Related to Work Order #R26-02Q1.15-P-0032" (page 1 of 3) which indicate the following cost categories make up the total charge.

Temnessee-American Water Company
Docket #17-68920
Response to TAW R CPADDRI 815
Cost Summary Related to Work Order #R26-02Q1.15-P-0032

From recon file "TAW TRA 2015 Coollister Secon" and tab "WKP 2015 Actuals", Source Powerplant

Work Order	G/L Account	G/L Account Name	Utility Account	Utility Account Name	Amount
R26-02Q1_15-P-0032	10631132	CCNC Pumping Equipment - Source of Supply	311320	Pumping Equipment-Source of S	\$594.83
	10630420	CONC Struct & Imp - Pumping	304200	Struct & Imp-Pumping	6,948.30
R26-02Q1 15-P-0032	25710000	Reg Link - Cost of Removal RWIF			431.62
					\$8,074.95
Work Order		General Cost Type	General Cost Description		Amount
R26-02Q1.15-P-0032		iabor	Labor & Related Costs		\$1,141.02
		inventory	Meterials issued from inventor	rv	0.00
		Invaices	Contracted Services & Mon-Inv	entory Materiats	71,991.30
		Salvage	Salvage/Scrap Receipts	4	0.00
		AFUDC	Allowance for Funds Used Duri	ing Construction	0.00
		Capital Accrual	Cost Accumis Related to Constr	uction	(71,266.3
		Overhead	Indirect Overhead		6,208.93
					58,074.93

Provide the "General Cost Type" components and amounts for "CCNC Pumping Equipment – Source of Supply" that total \$694.83, the "CNCC Struct & Imp – Pumping" that totals \$6,948.30 and the "Reg Liab – Cost of Removal RWIP" that total to \$431.82.

#### **RESPONSE:**

2-18. Refer to the Company's Response to CPAD 15-J regarding support for certain additions included for recovery in the Company's Capital Rider filing in the amount of \$10,964.11 and specifically to the page titled "Invoices Related to Work Order #R26-02Q1.16-P-

003" (page 2 of 3) which indicates the following invoices are the support for the ledger amount requested for recovery.

many Com	tipet	Sanner	Souther Subject	Cut Pened	(int element local)	THE PARTY OF	NewCode Tex	PRESTORE.	American de la constantina della constantina del	Passing Date	Otherstry :	Have of affecting account.
#	136 CC21.25 P-0003	n¢.	and brestable	11199000	Mic Rel 104MT - Nature And	73.00	630	100	£19.30		V10.00	
ä	E36-0001-187-0003	B.E.	limbered.	\$1300006	Wint but (CASH) - Nature: \$427.	215 10			200.00			
4	A39-0001.18-7-0008	WE	2212246421	E2100096	Mic Op CAME THOUSEAST	210 M 100 M	830	, 6.33	200.00			
ė .	AUE-6001.18 F GROS	WE-	SUCREMENT.	\$25000HE	Mile Tre (COM) / NATIVACE	417.00	2.84	6.15	413.30	A'un bise		

Provide a narrative response as to why the invoices referenced as support only total \$790.00 while the ledger charge is for \$10,964.11, a difference of \$10,174.11.

#### **RESPONSE:**

RESPECTFULLY SUBMITTED,

DANIEL P. WHITAKER III

(BPR No. 035410)

Assistant Attorney General

Office of the Tennessee Attorney General

**Public Protection Section** 

Consumer Protection and Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Telephone: (615) 532-9299 Facsimile: (615) 532-2910

Email: daniel. Whitaker@ag.tn.gov

## **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

Melvin J. Malone
Butler, Snow, O'Mara, Stevens & Cannada, PLLC
The Pinnacle at Symphony Place
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Nashville, TN 37201
melvin.malone@butlersnow.com

This the 19 day of May, 2017.

Daniel P. Whitaker III Assistant Attorney General