

STATE OF TENNESSEE

Office of the Attorney General



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Re: Tennessee Public Utility Commission, Docket No. 17-00108, *Petition of Tennessee Water Service for Approval of an Interim Emergency Wildfire Restoration Surcharge, Interim Emergency Water Service Availability Fee, Interim Emergency Make-Whole Surcharge and an Interim Emergency Operational Cost Pass-Through Mechanism*

Dear Mr. Freeman:

As promised in our call this morning, this letter provides a written explanation of the Consumer Advocate's request for clarification on two additional responses by Tennessee Water to the Consumer Advocate's discovery requests.

- **Request 1-16.** Tennessee Water (TWS) provided no response to last sentence of the request – "If no such policies provide insurance coverage for (a) damages or (b) business interruption coverage, discuss whether TWS or Utilities Inc., or any other affiliate intends to acquire such insurance to provide protection for similar events which may occur in the future." Please provide a response.
- **Request 1-22.** Tennessee Water objected to the discovery to the extent it calls for a legal conclusion regarding what point in time service lines are no longer "used and useful" for vacant properties. The Consumer Advocate is not seeking a legal conclusion but the accounting treatment of these services lines for vacant lots.

This is the third of three letters seeking clarification to Tennessee Water's responses. This morning Tennessee Water provided a response to the first clarification letter (dated October 10th), and the Consumer Advocate is seeking a response on the second letter (dated October 11th).

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