

BAKER DONELSON

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October 12, 2017

Karen H. Stachowski
Assistant Attorney General
Office of the Attorney General & Report
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207

**RE: Petition of Tennessee Water Service, Inc. for Approval of an Interim
Emergency Wildfire Restoration Surcharge, Interim Emergency Water
Service Availability Surcharge, Interim Emergency Make-Whole Surcharge,
and an Interim Emergency Operation Cost Pass-Through Mechanism,
TPUC Docket No. 17-00108**

Ms. Stachowski,

In response to your request for clarification in your letter dated October 10, 2017, please see the following supplemental response to Question 1-46 the Consumer Protection and Advocate Division's First Set of Discovery Requests.

If you have any questions, please feel free to reach out to me directly.

Sincerely,

BAKER, DONELSON, BEARMAN, CALDWELL
& BERKOWITZ, PC
s/ Ryan Freeman

Ryan Freeman

Enclosures
cc: TPUC Docket No. 17-00108

TENNESSEE WATER SERVICE, INC.
DOCKET NO. 17-00108
FIRST DISCOVERY REQUEST OF THE
CONSUMER PROTECTION AND ADVOCATE DIVISION

Responsible Witness: N/A

Question:

- 1 -46. Identify each person who you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert witness:
- (a) Identify the field in which the witness is to be offered as an expert;
 - (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
 - (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
 - (d) Provide the grounds for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
 - (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;
 - (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
 - (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
 - (h) Produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, work papers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

Response:

TWS does not intend to call any expert witnesses at the hearing on the merits in this docket.

**TENNESSEE WATER SERVICE, INC.
DOCKET NO. 17-00108
FIRST DISCOVERY REQUEST OF THE
CONSUMER PROTECTION AND ADVOCATE DIVISION**

Supplemental Response:

To the extent that TWS may call its employees as witnesses and those employees may offer expert opinions in their field of expertise, please see the following responses.

Richard Linneman

- (a) Financial Analysis.
- (b) Mr. Linneman is currently employed by Tennessee Water Service, Inc. as Manager of Financial Planning and Analysis. Prior to his employment at TWS, Mr. Linneman was the Director of Financial Planning and Analysis for Leslie's Poolmart, Inc., the world's largest retailer of swimming pool supplies and chemicals.

Mr. Linneman has a Bachelor's of Science degree from Coastal Carolina University in Conway, SC. He is also a Certified Rate of Return Analyst.
- (c) TWS represents that there is no information responsive to this request.
- (d) The grounds for Mr. Linneman's opinions can be found in his pre-filed direct testimony and in the responses to the Consumer Protection and Advocate Division's ("CPAD") discovery requests concerning financial modeling and accounting.
- (e) Mr. Linneman has testified in two matters:
 - a. Docket No. W-354, Sub 356, before the North Carolina Utilities Commission ("NCUC") in a general rate case for Carolina Water Service, Inc., of North Carolina. Mr. Linneman testified in September 2017.
 - b. Docket No. W-1058, Sub 7, before the NCUC in a general rate case for Elk River Utilities. Mr. Linneman testified in August 2016.
- (f) TWS represents that there is no information responsive to this request.
- (g) To the extent that any of these may be used as exhibits, please refer to the documents produced in the response to CPAD's discovery requests where Mr. Linneman is listed as the "Responsible Witness."
- (h) See documents produced in response to CPAD's discovery requests and exhibits filed with Mr. Linneman's pre-filed direct testimony.

Bryce Mendenhall

- (a) Operations and Capital Projects.

TENNESSEE WATER SERVICE, INC.
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- (b) Mr. Mendenhall is currently employed by TWS as the Vice President of Operations. Prior to this position, Mr. Mendenhall served as the Public Utilities Director of Franklin County, North Carolina from 2004-2017. In total, he has 25 years of experience in Public Utilities and Water & Wastewater Operations. Mr. Mendenhall holds certifications in North Carolina as a Certified Water Distribution Operator, a Certified Wastewater Collection System Operator, and as a Backflow Operator.
- (c) TWS represents that there is no information responsive to this request.
- (d) The grounds for Mr. Mendenhall's opinions can be found in his pre-filed direct testimony and in the responses to the CPAD's discovery requests concerning capital projects and infrastructure damaged by the 2016 Wildfires.
- (e) Mr. Mendenhall has testified in one matter:
 - a. Docket No. W-354, Sub 356, before the NCUC in a general rate case for Carolina Water Service, Inc., of North Carolina. Mr. Mendenhall testified in September 2017.
- (f) TWS represents that there is no information responsive to this request.
- (g) To the extent that any of these may be used as exhibits, please refer to the documents produced in the response to CPAD's discovery requests where Mr. Mendenhall is listed as the "Responsible Witness."
- (h) See documents produced in response to CPAD's discovery requests and exhibits filed with Mr. Mendenhall's pre-filed direct testimony.