

BUTLER | SNOW

March 23, 2018

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Sharla Dillon
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: *Petition of Tennessee-American Water Company Regarding The Production Costs and Other Pass-Throughs Rider*, TPUC Docket No. 18-00009

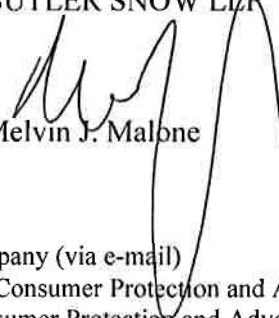
Dear Chairman Jones:

Attached for filing please find *Tennessee-American Water Company's Responses to Second Discovery Requests of the Consumer Protection and Advocate Division* in the above-captioned matter.

As required, an original of this filing, along with four (4) hard copies, will follow. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP


Melvin J. Malone

clw

Enclosure

cc: Linda Bridwell, Tennessee-American Water Company (via e-mail)
Daniel Whitaker III, Assistant Attorney General, Consumer Protection and Advocate Division (via email)
Vance Broemel, Assistant Attorney General, Consumer Protection and Advocate Division (via email)

*The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201*

MELVIN J. MALONE
615.651.6705
melvin.malone@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

41246077.v1

BUTLER SNOW LLP

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00009
SECOND DISCOVERY REQUEST OF THE
CONSUMER PROTECTION AND ADVOCATE DIVISION**

Responsible Person: Linda C. Bridwell

Question:

1. Refer to "11 – Workpaper_Waste Disposal.xlsx", tab "Marion Environmental". Has the company received the Invoice for the charge referenced on row 16 of this spreadsheet? If so, provide a copy of the Invoice. If not, state the Company's reasoning for inclusion of this charge in this filing and not the next PCOP filing?

Response:

See the attached invoice in the amount of \$20,352.00. This is for services provided in December. The \$18,000 on row 16 should not be included in this filing, but should be in the next filing. TAWC will provide an update to the filing to include this adjustment and any other adjustments that may be necessary by April 23, 2018.

Invoice

Invoice Number 30984
Invoice Date Jan 25, 2018
Supply Date Dec 7, 2017
Currency USD (US Dollar)
Purchase Order 3000229434
Payment Terms 45 days net

Supplier
Marion Environmental Inc
115 Parmenas Ln
Chattanooga, TN 37405-2624
US (United States)

Customer
Tennessee American Water
Company
131 Woodcrest Road
Cherry Hill, NJ 08003
US (United States)

Ship To
Sequatchie Valley
600 North Cedar Ave
Whitwell, TN 37397
US (United States)

#	PO Item	Description	Unit	Qty	Unit Price	Line Total
1	1	Residuals removed from plant	AU	1	\$20,352.00	\$20,352.00

Subtotal \$20,352.00
Total Tax Amount \$0.00
Invoice Amount \$20,352.00





**MARION
ENVIRONMENTAL INC.**
115 PARMENAS LANE
CHATTANOOGA, TN 37405
EIN 62-1472843

Invoice

BILL TO
AMERICAN WATER SERVICES P.O. BOX 5614 CHERRY HILL, NJ 08034-5614

DATE	INVOICE #
12/31/2017	30984
TERMS:	Net 30 Days
P.O. NO.:	
PROJECT:	17210-BASIN
SITE LOCATION & SCOPE OF WORK:	
CLEAN TREATMENT BASIN 12/07-12/08	

DESCRIPTION	QTY	UNIT	RATE	AMOUNT
12/07				
DROP TANKER	1	each	350.00	350.00
GUZZLER VACUUM TRUCK w/OPERATOR	8	hours	163.00	1,304.00
GUZZLER VACUUM TRUCK w/OPERATOR, ot	1	hour	183.00	183.00
EQUIPMENT FUEL SURCHARGE	1,035		0.12	124.20
SUPERVISOR-	8	hours	58.00	464.00
Industrial Cleaning				
SUPERVISOR, ot	1	hour	78.00	78.00
Industrial Cleaning				
TECHNICIAN-	8	hours	48.00	384.00
Industrial Cleaning				
TECHNICIAN- ot	1	hour	68.00	68.00
Industrial Cleaning				
HOSE - Chemflex 10 ft. section	1	section	25.00	25.00
HOSE - Hard Pipe 10ft section	3	sections	25.00	75.00
N/H WASTE WATER Manifest #128261	5,000	gallons	0.50	2,500.00
N/H WASTE WATER Manifest #128263	5,000	gallons	0.50	2,500.00
Transportation	2	loads	350.00	700.00
12/08				
GUZZLER VACUUM TRUCK w/OPERATOR	6	hours	163.00	978.00
EQUIPMENT FUEL SURCHARGE	690		0.12	82.80
SUPERVISOR-	6	hours	58.00	348.00
Industrial Cleaning				
TECHNICIAN-	6	hours	48.00	288.00
Industrial Cleaning				
HOSE - Chemflex 10 ft. section	1	section	25.00	25.00
HOSE - Hard Pipe 10ft section	3	sections	25.00	75.00
N/H WASTE WATER Manifest #122530	1,800	gallons	0.50	900.00
N/H WASTE WATER Manifest #128264	5,000	gallons	0.50	2,500.00
N/H WASTE WATER Manifest #128265	5,000	gallons	0.50	2,500.00
N/H WASTE WATER Manifest #128266	5,000	gallons	0.50	2,500.00
Transportation	4	loads	350.00	1,400.00

A service charge of 1.5% per month, annual percentage rate of 18%, will be assessed on all past due amounts plus attorney's fees and costs of collection.

TOTAL	\$20,352.00
--------------	--------------------

TR# 7312

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest No.	2. Page 1 of
3. Generator's Name and Mailing Address		Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397		
4. Generator's Phone (423	488-4810		
5. Transporter 1 Company Name	MEI		6. US EPA ID Number	A. Transporter's Phone
7. Transporter 2 Company Name			8. US EPA ID Number	B. Transporter's Phone
9. Designated Facility Name and Site Address	Aqua Treat, Inc. 817 Hudson Road Chattanooga, TN 37405		10. US EPA ID Number	C. Facility's Phone
11. Waste Shipping Name and Description		TNR000019604 (423) 488-4810		
		TNR000007476 (423) 265-0132		
D. Additional Descriptions for Materials Listed Above		E. Handling Codes for Wastes Listed Above		
Approval #1986D		Solidification		
15. Special Handling Instructions and Additional Information				
Arrival: Job#17210				
Departure:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulation for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name		Signature		Month Day Year
Denny Long		Denny Long		11/21/17
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year
Printed/Typed Name		Signature		Month Day Year
Roger Pool		Roger Pool		11/21/17
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature		Month Day Year
Roger King		Roger King		12/7/17

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest No.	2. Page 1 of
3. Generator's Name and Mailing Address		Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397		
4. Generator's Phone	423 499-4919			
5. Transporter 1 Company Name	MEI	6. US EPA ID Number	A. Transporter's Phone	
		TNR000019604	(423) 499-4919	
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter's Phone	
9. Designated Facility Name and Site Address	Aqua Treat, Inc. 817 Hudson Road Chattanooga, TN 37405	10. US EPA ID Number	C. Facility's Phone	
		TNR000007476	(423) 265-0132	
11. Waste Shipping Name and Description		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-Hazardous Wastewater/WWT Sludge		001 TT	5000	G
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above		E. Handling Codes for Wastes Listed Above		
Approval #1996D		Solidification		
15. Special Handling Instructions and Additional Information				
Arrival: Job#17210				
Departure:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name		Signature	Month Day Year	
Michael Griffith		[Signature]	12/7/17	
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature	Month Day Year	
Tom Reuter		Tom Reuter	12/7/17	
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature	Month Day Year	
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature	Month Day Year	
Roger King		Roger King	12/7/17	

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest No.	2. Page 1 of
3. Generator's Name and Mailing Address		Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397		
4. Generator's Phone (423	498-4819		
5. Transporter 1 Company Name	MEI	6. US EPA ID Number	TNR000019604	
7. Transporter 2 Company Name		8. US EPA ID Number		
9. Designated Facility Name and Site Address	Aqua Treat, Inc. 817 Hudson Road Chattanooga, TN 37405		10. US EPA ID Number	TNR000007476
		C. Facility's Phone (423) 265-0132		
11. Waste Shipping Name and Description		12. Containers	13. Total Quantity	14. Unit
a. Non-Hazardous Wastewater/WWT Sludge		No.	Type	1800 gal
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above		E. Handling Codes for Wastes Listed Above		
Approval #1908D		Solidification		
15. Special Handling Instructions and Additional Information				
Arrival: Job#17210				
Departure:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name		Signature	Month	Day Year
Richard James Hankins		James Hankins	12	8 17
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature	Month	Day Year
Printed/Typed Name		Michael G. Smith	12	8 17
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature	Month	Day Year
Printed/Typed Name				
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature	Month	Day Year
Roger King		Roger King	12	8 17

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest No.	2. Page 1 of
3. Generator's Name and Mailing Address		Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397		
4. Generator's Phone () 423 498-4918				
5. Transporter 1 Company Name MEI		6. US EPA ID Number TNR000019604	A. Transporter's Phone (423) 498-4918	
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter's Phone	
9. Designated Facility Name and Site Address Aqua Treat, Inc. 817 Hudson Road Chattanooga, TN 37405		10. US EPA ID Number TNR000007476	C. Facility's Phone (423) 285-0132	
11. Waste Shipping Name and Description		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Val
a. Non-Hazardous Wastewater/WWT Sludge		001 RT	5000	G
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above Approval #1998D		E. Handling Codes for Wastes Listed Above solidification		
15. Special Handling Instructions and Additional Information Arrival: Job#17210 Departure:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name Michael Griffith		Signature [Signature]		Month Day Year 12/7/17
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Tom Rector		Signature Tom Rector		Month Day Year 12/8/17
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name Roger King		Signature Roger King		Month Day Year 12/8/17

ORIGINAL - RETURN TO GENERATOR

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest No.	2. Page 1 of
3. Generator's Name and Mailing Address		Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397		
4. Generator's Phone		423 488-4819		
5. Transporter 1 Company Name		6. US EPA ID Number	A. Transporter's Phone	
MEI		TNR000019604	(423) 488-4819	
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter's Phone	
9. Designated Facility Name and Site Address		10. US EPA ID Number	C. Facility's Phone	
Aqua Treat, Inc. 817 Hudson Road Chattanooga, TN 37405		TNR000007476	(423) 265-0132	
11. Waste Shipping Name and Description		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-Hazardous Wastewater/WWT Sludge		001 TT	5000	G
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above		E. Handling Codes for Wastes Listed Above		
Approval #1988D		Solidification		
15. Special Handling Instructions and Additional Information				
Arrival: Job#17210				
Departure:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name		Signature	Month	Day Year
Michael Conner		[Signature]	12	8 17
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature	Month	Day Year
Kim Ketch		[Signature]	12	8 17
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature	Month	Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name		Signature	Month	Day Year
Roger King		[Signature]	12	8 17

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest No.	2. Page 1 of
3. Generator's Name and Mailing Address		Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397		
4. Generator's Phone (423) 488-4919				
5. Transporter 1 Company Name MEI	6. US EPA ID Number TNR000019604	A. Transporter's Phone (423) 488-4919		
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone		
9. Designated Facility Name and Site Address Aqua Treat, Inc. 617 Hudson Road Chattanooga, TN 37405	10. US EPA ID Number TNR000007476	C. Facility's Phone (423) 265-0132		
11. Waste Shipping Name and Description		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-Hazardous Wastewater/WWT Sludge		001 TE	5000	G
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above Approval #1998D		E. Handling Codes for Wastes Listed Above Solidification		
15. Special Handling Instructions and Additional Information Arrival: Job#17210 Departure:				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name Michael Conner		Signature <i>[Signature]</i>		Month Day Year 12/8/17
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Tom Rector		Signature Tom Rector		Month Day Year 12/8/17
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name Danny Bales		Signature <i>[Signature]</i>		Month Day Year 12/8/17

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00009
SECOND DISCOVERY REQUEST OF THE
CONSUMER PROTECTION AND ADVOCATE DIVISION**

Responsible Person: Linda C. Bridwell

Question:

2. Refer to "11 – Workpaper_Waste Disposal.xlsx", tab "Denali Water Solution". Has the company received the Invoice for the charge referenced on row 20 of this spreadsheet? If so, provide a copy of this Invoice. If not, state the Company's reasoning for inclusion of this charge in this filing and not the next PCOP filing?

Response:

Please refer to the attached invoice from Denali Water Solution for \$8,758.28 posted 12.28.2017.

Denali Water Solutions, LLC
PO Box 3036
Russellville, AR 72811
(479) 498-0500 phone
(479) 498-0501 fax



Invoice Date:	Invoice #
10/31/2017	0015668-IN

Order Number: 0016570
Invoice Due Date: 12/15/2017
Customer Number: 0020686
Customer PO: 3000185652
Terms: Due 45 Days
Location:

BILL TO:
American Water - TN / Tennessee American Water
131 Woodcrest Road
Cherry Hill, NJ 08003

CHA

Date	Tkt #	ScaleTkt	Description	Unit	Qty	Rate	Amount
10/31/2017			Sludge Removal & Disposal / Long Term GY-101 10/1/17 thru 10/31/17	TON	256.09	34.2000	8,758.28

Customer Signature

Remit To:

Denali Water Solutions LLC
P.O. Box 740903
Atlanta, GA 30374-0903

Net Invoice:	8,758.28
Less Discount:	0.00
Sales Tax:	0.00
Invoice Total:	\$8,758.28

STATE OF Kentucky)
COUNTY OF Fayette)

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Linda C. Bridwell, being by me first duly sworn deposed and said that:

She is appearing as a witness on behalf of Tennessee-American Water Company before the Tennessee Public Utility Commission, and if present before the Commission and duly sworn, the data requests responses are accurate to the best of her knowledge.

Linda C. Bridwell
Linda C. Bridwell

Sworn to and subscribed before me
this 23 day of March, 2018.

Sharon Miller
Notary Public

My Commission Expires: 7/25/2020

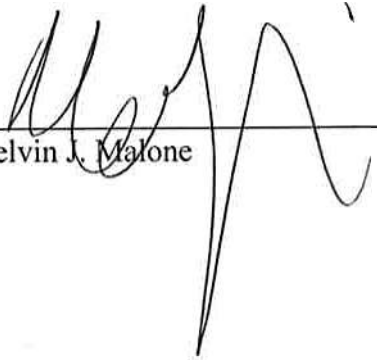
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Vance Broemel, Esq.
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Vance.Broemel@ag.tn.gov

Daniel Whitaker III, Esq.
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Daniel.Whitaker@ag.tn.gov

This the 23rd day of March, 2018.



Melvin J. Malone