# BUTLER | SNOW

March 23, 2018

### VIA ELECTRONIC FILING

Hon. David Jones, Chairman c/o Sharla Dillon Tennessee Public Utility Commission 502 Deaderick Street, 4<sup>th</sup> 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 LIA

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

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# 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 Currency

Dec 7, 2017 USD (US Dollar)

Purchase Order

3000229434

**Payment Terms** 

Ship To Sequatchie Valley 600 North Cedar Ave Whitwell, TN 37397

US (United States)

45 days net

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

Tennessee American Water 131 Woodcrest Road Cherry Hill, NJ 08003 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
		riconous removes nom pain	7.0	,	DE0100E.00	\$20,002.0

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





#### BILL TO

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

# **Invoice**

	DATE	INVOICE #
	12/31/2017	30984
TERMS:	Net 30 Days	
P.O. NO.:		
PROJECT:	17210-BASIN	
SITE LOCATION	ON & SCOPE OF WOR	RK:
CLEANTRE	ATMENT BASIN	

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 WOPERATOR	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	100	entendering	92787617650	
SUPERVISOR, of	1	hour	78.00	78.00
Industrial Cleaning				
TECHNICIAN-	8	hours	48.00	384.00
Industrial Cleaning			0	
TECHNICIAN- ot	1	hour	68.00	68.00
Industrial Cleaning	1	10.000000	V.505005050	
HOSE - Chemflex 10 ft. section	1 1	section	25.00	25.00
HOSE - Hard Pipe 10ft section		sections	25.00	75 00
N/H WASTE WATER Manifest #128261		gallons	0.50	2,500.00
N/H WASTE WATER Manifest #128263		gallons	0.50	2,500.00
Transportation		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			1	
rechnician-	6	hours	48.00	288.00
Industrial Cleaning	277		700000	
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		gallons	0.50	2,500.00
VH WASTE WATER Manifest #128265		gallons	0.50	2,500.00
N/H WASTE WATER Manifest #128266	5,000		0.50	2,500.00
ransportation	4	loads	350.00	1,400.00
			333,00	1,700,00

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# 731,2

	IAZARDOUS MANIFEST	1. Generator	's US EPA ID No.	Manifest No. 2826	2. Page 1 of			
Generator's Name o     Generator's Phone I		10	Tennessee 600 North C Whitwell, Tr		r			
5. Transporter 1 Campa				ID Number	A. Transporter	Phone		-
	0019604	(423) 48	9-4919					
7. Transporter 2 Compa	MEI my Name			ID Number	B. Transporter's			
9. Designated Facility N	Aqua Treat, In 617 Hudson Re	oad		ID Number	C. Facility's Pho			_
	Chattanooga,	N 3/405	INKUU	0.0 0 7 4 7. 6.	(423) 26			
11. Waste Shipping Na	me and Description				12. N	Containers Jype	Total Quantity	Un Wil
0.	Non-Hazardou	s Wastewater	WWT Sludge		.1	T	5,000	6
ь. с.						2 2		-
d					,			_
	Approval #1990				Soldi		ron	
15. Special Handling Ins	Arrival: Departure:	rmotion	Jk	ob#17210				
6. GENERATOR'S CE	RTIFICATION: I certify the	materia's described o	above on this manifest are	not subject to federal reg	ulation for report	ng proper o	disposal of Hazardos	ı Woı
Printed/Typed No			Signature	Denn	The		1/2/100	
2. Iruniporter 1 Arkeni	ledgement of Roceips of Mot	oriols.		0	4		1, 01 0	11
Printed/Typed Name	Roserl	0001-	Signature	Rica	Paul		Month   Day	1 1
8. Transporter 2 Acknow	leagument of Receipt of Mat	eriels		1-3			-1211	
Printed/Typed Name			Signature				Month Day	y Yo
9. Discrepancy Indication	n Spoce							1 .
0. Facility Owner or Ope	rator: Certification of receip	t of waste materials c	overed by this manifest exce	ept as noted in Item 19.				
Printed/Typed Name  3000 K	10.4		Signature	are him			Month Day	

WASTE N	ZARDOUS MANIFEST	1. Generalor	s US EPA ID No.	1282		je 1		*	
3. Generator's Name and a 4. Generator's Phone (	Mailing Address 423   499-49	19		American W Ceder Ave. N 37397	<b>leter</b>				
5. Transporter 1 Company	Name			PA ID Number	195 A. 1950	nsporter's Ph			
7. Transporter 2 Company	MEI			001960 A ID Number		23) 499- nsporter's Ph			-
7. Iransporter 2 Company	Nome		1	A ID Number	B. Irg	nsporter s Ph	one		
9. Designated Facility Nam	e and Sile Address Aqua Treat, In 817 Hudson R Chattanooga,	oad		O 0 0 7 4 7.		23) 265-	0132	-	
11. Waste Shipping Name						12. Co		13. Total	14. Uni
						No.	Туре	Total Quantity	Wi/V
a.	Non-Hazardou	s Wastewater/	VVVT Sludge			0.01	7.7	5000	G
c		e.					+5		
c.						(D) (S)			
d									
D. Additional Descriptions for	or Materials Listed Above	,			E. Ho	ndling Codes	for Was	tes Listed Above	
	Approval #199	BD.			Æ	ોદી 4	ati	60	
15. Special Handling Instruc	tions and Additional Info	ormation			•				
	Arrival:			lob#17210					
	Departure:								
16. GENERATOR'S CERTII Printed/Typed Nome	FICATION: I certify the	materials described o	above on this manifest or Signatur		ol regulations fo	or reporting	proper d		
Trinied) typod redile	Michael 61	ttity	Jagardio.	2/12	111			Month Do	Yes
17. Transporter 1 Acknowled		terials .	Signature	Ton K	o t			Month Do	
18 Transporter 2 Acknowled Printed/Typed Name		700	Signature					Month Da	y Yeo
19. Discrepancy Indication Sp	росе			-				1 - 1 -	
20. Facility Owner or Operate	or: Certification of receip	of waste materials o	overed by this manifest as	cept as noted in Item	19.	-			
Printed/Typed Name Royar K	in		Signature	Zaye-k	in			Month Do	Year

WAS	HAZARDOUS TE MANIFEST	1. Generator's US	EPA ID No.	122530	2. Page 1 of			
Generator's Name     Generator's Phone	433 400 404	19	Tennessee 600 North C Whitwell, Th					
5. Transporter 1 Com		i		D Number 0.0.1.9604	A. Transport		499-4919	
7. Transporter 2 Com	pany Name		B. US EPA I	D Number	B. Transporte	er's Phone		
9. Designated Facility	Name and Site Address Aqua Treat, Inc 617 Hudson Re Chattanooga, 1	c. o <b>ad</b>	10. US EPA 1	0 Number	C. facility's		) 265-0132	
11. Waste Shipping t					- 10	2. Containers	13. Total Quantity	14. Unit
a.	Non-Hazardou	s Wastewater/W	WT Sludge			leo. Type	1800	q
c.		•						
c.								
d.								
D. Additional Descript	ions for Materials Listed Above Approval #1990	BD.	,		100 mm 100 mm 200 mm	Codes for Was	tes Listed Above	ـــــــــــــــــــــــــــــــــــــ
15. Special Handling I	Instructions and Additional Infor	motion	Jo	b#17210				
16. GENERATOR'S C	Nume A Mes	nogerials described above	Signalure	or subject to federal regu	dariogs for repo	orling proper d	Spesol of Hazardov Month De	
British / Franch bloom	owledgement of Receipt of Mate	scials	Signature	DA			Month Do	Yeo
18 Transporter 2 Ackn Printed/Typed Nam	owledgement of Receipt of Mate ne		Signature				Month Day	Yes
19. Discrepancy Indicat	tion Space							
20. Facility Owner or C	Operator: Certification of receipt	of waste materials covere	ed by this monifest exce	pt as noted in Item 19.				
Printed/Typod Nam	kin		Signature	·			Month Day	Yes

WAST	HAZARDOUS E MANIFEST	1. Generator's	US EPA ID No.	Manifest No.	2. Page of	1			
Generator's Name     Generator's Phane	422 400 404	9		American Wate Cedar Ave. N 37397	r				
5. Transporter 1 Comp	oany Name			PA ID Number		sporter's Pho			
7. Transporter 2 Comp	MEI			PA ID Number		3) 499-4 sporter's Pho		-	_
			•						
9. Designated Facility	Nome and Site Address Aqua Treat, Inc 617 Hudson Ro	ad	3,511	PA ID Number		lity's Phone	1422		
11 Mark Shinaka N	Chattanooga, T	N 3/4U5	inno	0.007476	(42	3) 285-4 12. Con			1
11. Waste Shipping N	lame and Description					No.	Type	13. Total Quantity	Unit Wt/Ve
o	Non-Hazardous	Wastewater/V	WVT Sludge			001	IT	5000	(,-
b.									
c.					-				
d.									-
D. Additional Description	ons for Materials Listed Above				F Hon	dling Codes	for Was	les Listed Above	
	Approval #1996	_			1	lidi+			
115. Special Handling In	astructions and Additional Infor	mation	į	Job#17210					
	Departure:								
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	wladgement of Receipt of Mate	rials		- 1					
Printed/Typed Name	Tom Rector		Signature	Jon Ru	<b>~</b> .			12 -8	
18. Transporter 2 Ackno Printed/Typed Name	wladgement of Receipt of More	riols	Signature	-				Month Day	Yeor
19, Discrepancy Indicati	on Space								
20. Facility Owner or Op	perator: Certification of receipt	of waste materials cov	ered by this manifest a	xcept as noted in Item 19.					
Printed/Typed Name	Kim		Signature	me Km	_			Month Day	Year

	ZARDOUS MANIFEST	I Generator	N US EPA ID No. Monifest No.	2. Poge I of						
Generator's Name and     Generator's Phone [	THE RESERVE OF THE PARTY OF THE	19	Tennessee American Water 600 North Cedar Ave. Whitwell, TN 37397							
5. Transporter I Company	Nome ME1	TNR 0.000 19604	A. Transporter's (423) 499	hone -4819						
7. Transporter 2 Company			8. US EPA ID Number	8. Transporter's Phone						
9. Designated Facility Nan	Aqua Treat, In 617 Hudson Re Chattanooga,	oad	10. US EPA ID Number	C. Facility's Phon (423) 265						
11. Waste Shipping Name	and Description			12. C	ontainers	13.	1			
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Additional Descriptions     Special Handling Instru	Approval #199	BD		So liki						
5. Special reasoning assista	Arrival: Departure:	rmanon	Job#17210							
		materials described	above on this manifest are not subject to federal regu	dations for reporting	proper d	sposal of Hazarda	ous W			
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Iransporter 1 Acknowled			Signature Jon , Keet	-		Month D  /2   8:	oy  /			
Transparter 2 Acknowled Printed/Typed Name		eriols	Signature				ay			
Discrepancy Indication S	poce									
Facility Owner or Opera	tor: Certification of receip	t of waste materials o	covered by this manifest except as noted in Item 19.							
Printed/Typed Name	=jy		Signature Roya Taling			Month D	оу / 1 /			

	I-HAZARDOUS STE MANIFEST	1. Generator	's US ERA ID No.		Manifest No. 28266		e 1		<del></del>	
Generator's Nam     Generator's Phon	ne and Mailing Address ne ( 423 ) 499-491	9	Tennes: 600 Nor Whitwel	th Cede						
5. Transporter 1 Co	MEI		THRO		19604	(4	nsporter's Ph 23) 499-	4919		
7. Transporter 2 Co	mpany Name		8 L	IS EPA ID Nur	nber	B. Trai	nsporter's Ph	one		
9. Designated Facili	ity Nome and Site Address Aqua Treat, Inc 917 Hudeen Re Chattanooga, 1	red		IS EPA ID Nur	nber 0 7 4 7 6		ility's Phone 23) 265-	0132		
11. Woste Shipping	Name and Description	-			~- <del></del>		12, Cor	Type	13. Total Quantity	14. Unit Wr/V
a	Non-Hazardous	Wastewater	/////T Sludge				001	77.	50,00	G-
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D. Additional Descrip	ptions for Materials Listed Above					E. Ho	ndling Codes	for Wast	as Listed Above	
	Approval #1996	D				50	lidi 6	ia fi	6n	
15. Special Handling	Instructions and Additional Info	rmation		Job#17	7210					
	Departure:									
	CERTIFICATION: I cortify the	materials described a	above on this manife:	st are not sub	ject to federal regu	lations fo	or reporting :	proper di	sposal of Hazard	ous Waste
Printed/Typed	irchal Gniffit	2	Sign	200	Dh				Month E	Day Year
	nowledgement of Receipt of Man	erials								
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20. Facility Owner or 0	Operator: Certification of receipt	of waste materials c	overed by this manife	st except as n	noted in Hem 19.				-	
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# 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

Date	Tkt#	ScaleTkt	De	escription	Unit	Qty	Rate	Amount
10/31/2017		Social Pike		& Disposal / Long Term	TON	256.09	34.2000	8,758.2
Customer Signature		Remit To:  Denail Water Solutions LLC P.O. Box 740903 Atlanta, GA 30374-0903		Less	let Invoice: s Discount: Sales Tax:	8,758.2 0.0 0.0		

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.

Sworn to and subscribed before me this  $Q^3$  day of March, 2018.

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 23<sup>rd</sup> day of March, 2018.

Melvin J. Malone