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December 14, 2018

VIA ELECTRONIC FILING

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

RE: *Joint Petition of Tennessee-American Water Company, and Thunder Air, Inc. d/b/a Jasper Highlands Development, Inc. for Approval of a Purchase Agreement and for the Issuance of a Certificate of Convenience and Necessity*
TPUC Docket No. 18-00099

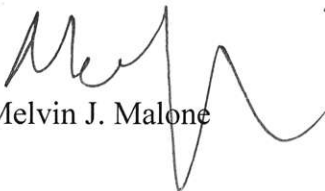
Dear Chairman Jones:

Attached for filing please find *Tennessee-American Water Company's Responses to Third 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

Attachments

cc: Linda Bridwell, Tennessee-American Water Company
Daniel Whitaker, Consumer Protection and Advocate Division
William H. Horton, Counsel for Thunder Air, Inc.

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BUTLER SNOW LLP

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

**JOINT PETITION OF TENNESSEE-
AMERICAN WATER COMPANY AND
THUNDER AIR, INC. D/B/A JASPER
HIGHLANDS DEVELOPMENT, INC.
FOR APPROVAL OF AN ASSET
PURCHASE AGREEMENT AND FOR
THE ISSUANCE OF A CERTIFICATE
OF CONVENIENCE AND NECESSITY**)
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DOCKET NO. 18-00099

**TENNESSEE-AMERICAN WATER COMPANY'S RESPONSES
TO THIRD DISCOVERY REQUESTS OF
THE CONSUMER PROTECTION AND ADVOCATE DIVISION**

Tennessee-American Water Company ("TAWC"), by and through counsel, hereby submits its Responses to the Third Discovery Requests propounded by the Consumer Protection and Advocate Division of the Office of the Attorney General ("CPAD").

GENERAL OBJECTIONS

1. TAWC objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.
2. TAWC objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission ("TPUC" or "Commission").

3. The specific responses set forth below are based on information now available to TAWC, and TAWC reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. TAWC objects to each request to the extent that it is unreasonably cumulative or duplicative, or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. TAWC objects to each request to the extent it seeks information outside TAWC's custody or control.

6. TAWC's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of TAWC's General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. TAWC objects to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome, and exceed the scope of permissible discovery.

8. TAWC objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. TAWC does not waive any previously submitted objections to the CPAD's discovery requests.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

1. Provide a pro forma journal entry for TAWC to record the acquisition of Jasper Highlands that classifies the plant acquired in accordance with the Uniform System of Accounts, along with the depreciation rates that will be applied to each plant account.

Response:

Tennessee American proposes that the lesser of the purchase price or the fair market value shall constitute the rate base associated with the acquired assets, as well as transaction and closing costs. In this case, the purchase price and the fair market value are \$1.5 million and the Company proposes using this net value to record the value of the Utility Plant Assets. The initial transaction is proposed to include:

DR	Utility Plant in Service	\$1,500,000.00	
CR	Cash		\$1,500,000.00

Per the Company's response to the TPUC's first request for information, item 14, Jasper Highlands has approximately \$4.6 million of Utility Plant in Service and approximately \$0.2 million Accumulated Depreciation per books, for an approximate net plant value of \$4.4 million per books. However, Tennessee American has negotiated a purchase price of \$1.5 million. The proposed debit to Utility Plant in Service would be for the purchase price and would be made by spreading the \$1.5 million ratably over the 101 accounts shown on page 2 of the Company's response to TPUC's first request for information, item 14.

The depreciation rates to be applied would be the existing approved rates of Tennessee American. These may be found in the attached schedule.

Tennessee American Water Company

Depreciation Rate Download

*rates from fixed asset system (subledger)

rate_type	depr_afudc_method	utility_sub_acct	naruc_acct	start_month	rate_eff_date	life_rate	cor_rate
DEPRECIATION - Rate Area 26-00	26:252 271110:RA26-00	271110-CIAC-NT Mains-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271120:RA26-00	271120-CIAC-NT Ext Dep-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271130:RA26-00	271130-CIAC-NT Fire Services-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271140:RA26-00	271140-CIAC-NT Meters-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271150:RA26-00	271150-CIAC-NT Hydrants-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271160:RA26-00	271160-CIAC-NT Other-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271210:RA26-00	271210-CIAC-Tax Mains-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271230:RA26-00	271230-CIAC-Tax Services-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271240:RA26-00	271240-CIAC-Tax Meters-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271250:RA26-00	271250-CIAC-Tax Hydrants-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:252 271260:RA26-00	271260-CIAC-Tax Other-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	01/2006	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:271110:RA26-00	271110-CIAC-NT Mains-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:271120:RA26-00	271120-CIAC-NT Ext Dep-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:271130:RA26-00	271130-CIAC-NT Fire Services-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	10/2008	1.11%	0.00%
DEPRECIATION - Rate Area 26-00	26:271140:RA26-00	271140-CIAC-NT Meters-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	7.03%	0.20%
DEPRECIATION - Rate Area 26-00	26:271150:RA26-00	271150-CIAC-NT Hydrants-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	1.97%	0.33%
DEPRECIATION - Rate Area 26-00	26:271160:RA26-00	271160-CIAC-NT Other-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	10/2008	1.25%	0.00%
DEPRECIATION - Rate Area 26-00	26:271210:RA26-00	271210-CIAC-Tax Mains-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:271230:RA26-00	271230-CIAC-Tax Services-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	10/2008	1.11%	0.00%
DEPRECIATION - Rate Area 26-00	26:271240:RA26-00	271240-CIAC-Tax Meters-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	7.03%	0.20%
DEPRECIATION - Rate Area 26-00	26:271250:RA26-00	271250-CIAC-Tax Hydrants-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	09/2012	1.97%	0.33%
DEPRECIATION - Rate Area 26-00	26:271260:RA26-00	271260-CIAC-Tax Other-Water - None	252/271-CAC/CIAC	1/1/2014 0:00	10/2008	1.25%	0.00%
DEPRECIATION - Rate Area 26-00	26:304100:RA26-00	304100-Struct & Imp-Supply - None	304.2-Struct & Imp-SS & PP	1/1/2014 0:00	10/2008	1.72%	0.26%
DEPRECIATION - Rate Area 26-00	26:304200:RA26-00	304200-Struct & Imp-Pumping - None	304.2-Struct & Imp-SS & PP	1/1/2014 0:00	10/2008	1.72%	0.26%
DEPRECIATION - Rate Area 26-00	26:304300:RA26-00	304300-Struct & Imp-Treatment - 304300-Struct & Ir	304.3-Struct & Imp-WT	1/1/2014 0:00	10/2008	3.57%	0.54%
DEPRECIATION - Rate Area 26-00	26:304301:RA26-00	304300-Struct & Imp-Treatment - 304301-Struct & Ir	304.3-Struct & Imp-WT	1/1/2014 0:00	10/2008	12.06%	0.00%
DEPRECIATION - Rate Area 26-00	26:304310:RA26-00	304300-Struct & Imp-Treatment - 304310-Struct & Ir	304.3-Struct & Imp-WT	1/1/2014 0:00	03/2012	3.57%	0.54%
DEPRECIATION - Rate Area 26-00	26:304330:RA26-00	304300-Struct & Imp-Treatment - 304330-Struc & Im	304.3-Struct & Imp-WT	1/1/2014 0:00	03/2012	3.57%	0.54%
DEPRECIATION - Rate Area 26-00	26:304400:RA26-00	304400-Struct & Imp-T&D - None	304.4-Struct & Imp-T&D	1/1/2014 0:00	10/2008	1.85%	0.28%
DEPRECIATION - Rate Area 26-00	26:304500:RA26-00	304500-Struct & Imp-General - None	304.5-Struct & Imp-GP	1/1/2014 0:00	10/2008	0.98%	0.15%
DEPRECIATION - Rate Area 26-00	26:304510:RA26-00	304510-Struct & Imp-Cap Lease - None	304.5-Struct & Imp-GP	1/1/2014 0:00	10/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:304600:RA26-00	304600-Struct & Imp-Offices - None	304.5-Struct & Imp-GP	1/1/2014 0:00	10/2008	0.98%	0.15%
DEPRECIATION - Rate Area 26-00	26:304700:RA26-00	304700-Struct & Imp-Store,Shop,Gar - None	304.5-Struct & Imp-GP	1/1/2014 0:00	10/2008	0.63%	0.10%
DEPRECIATION - Rate Area 26-00	26:304800:RA26-00	304800-Struct & Imp-Misc - None	304.5-Struct & Imp-GP	1/1/2014 0:00	10/2008	0.43%	0.06%
DEPRECIATION - Rate Area 26-00	26:306000:RA26-00	306000-Lake, River & Other Intakes - None	306.2-Lake, River & Oth Intakes	1/1/2014 0:00	10/2008	0.79%	0.04%
DEPRECIATION - Rate Area 26-00	26:309000:RA26-00	309000-Supply Mains - None	309.2-Supply Mains	1/1/2014 0:00	10/2008	1.87%	0.00%
DEPRECIATION - Rate Area 26-00	26:310000:RA26-00	310000-Power Generation Equip - None	310.2-Power Generation Equip	1/1/2014 0:00	10/2008	11.74%	0.59%
DEPRECIATION - Rate Area 26-00	26:311200:RA26-00	311200-Pump Eqp Electric - None	311.2-Pumping Equipment-SS & PP	1/1/2014 0:00	10/2008	2.23%	0.22%
DEPRECIATION - Rate Area 26-00	26:311300:RA26-00	311300-Pump Eqp Diesel - None	311.2-Pumping Equipment-SS & PP	1/1/2014 0:00	10/2008	2.27%	0.23%
DEPRECIATION - Rate Area 26-00	26:311500:RA26-00	311500-Pump Eqp Other - None	311.2-Pumping Equipment-SS & PP	1/1/2014 0:00	10/2008	1.66%	0.17%
DEPRECIATION - Rate Area 26-00	26:311520:RA26-00	311000-Pumping Equipment - 311520-Pump Eqp SO	311.2-Pumping Equipment-SS & PP	1/1/2014 0:00	09/2012	1.66%	0.17%
DEPRECIATION - Rate Area 26-00	26:320100:RA26-00	320100-WT Equip Non-Media - None	320.3-Water Treatment Equip	1/1/2014 0:00	10/2008	0.99%	0.10%
DEPRECIATION - Rate Area 26-00	26:320200:RA26-00	320200-WT Equip Filter Media - None	320.3-Water Treatment Equip	1/1/2014 0:00	12/2008	30.31%	3.38%
DEPRECIATION - Rate Area 26-00	26:330000:RA26-00	330000-Dist Reservoirs & Standpipes - None	330.4-Dist Res & Standpipes	1/1/2014 0:00	10/2008	1.73%	0.35%
DEPRECIATION - Rate Area 26-00	26:330003:RA26-00	330003-Tank Repainting - None	330.4-Dist Res & Standpipes	1/1/2014 0:00	10/2008	11.08%	0.00%
DEPRECIATION - Rate Area 26-00	26:330100:RA26-00	330100-Elevated Tanks & Standpipes - None	330.4-Dist Res & Standpipes	1/1/2014 0:00	10/2008	2.28%	0.46%

DEPRECIATION - Rate Area 26-00	26:330200:RA26-00	330200-Ground Level Tanks - None	330.4-Dist Res & Standpipes	1/1/2014 0:00	10/2008	2.28%	0.46%
DEPRECIATION - Rate Area 26-00	26:330300:RA26-00	330300-Below Ground Tanks - None	330.4-Dist Res & Standpipes	1/1/2014 0:00	04/2011	2.28%	0.46%
DEPRECIATION - Rate Area 26-00	26:330400:RA26-00	330400-Clearwell - None	330.4-Dist Res & Standpipes	1/1/2014 0:00	10/2008	1.38%	0.27%
DEPRECIATION - Rate Area 26-00	26:331001:RA26-00	331001-T&D Mains - 331001-TD Mains Not Classifiec	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:331100:RA26-00	331001-T&D Mains - 331100-TD Mains 4in & Less	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:331200:RA26-00	331001-T&D Mains - 331200-TD Mains 6in to 8in	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:331210:RA26-00	331001-T&D Mains - 331210-TD Mains 6in to 10in-TI	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:331300:RA26-00	331001-T&D Mains - 331300-TD Mains 10in to 16in	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:331350:RA26-00	331001-T&D Mains - 331350-TD Mains 12in & Grtr-T	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:331400:RA26-00	331001-T&D Mains - 331400-TD Mains 18in & Grtr	331.4-T&D Mains	1/1/2014 0:00	10/2008	1.08%	0.17%
DEPRECIATION - Rate Area 26-00	26:333000:RA26-00	333000-Services - None	333.4-Services	1/1/2014 0:00	10/2008	1.11%	0.00%
DEPRECIATION - Rate Area 26-00	26:334100:RA26-00	334100-Meters - 334100-Meters	334.4-Meters & Meter Installs	1/1/2014 0:00	10/2008	7.26%	0.21%
DEPRECIATION - Rate Area 26-00	26:334110:RA26-00	334100-Meters - 334110-Meters Bronze Case	334.4-Meters & Meter Installs	1/1/2014 0:00	10/2008	7.03%	0.20%
DEPRECIATION - Rate Area 26-00	26:334120:RA26-00	334100-Meters - 334120-Meters Plastic Case	334.4-Meters & Meter Installs	1/1/2014 0:00	10/2008	7.03%	0.20%
DEPRECIATION - Rate Area 26-00	26:334130:RA26-00	334100-Meters - 334130-Meters Other	334.4-Meters & Meter Installs	1/1/2014 0:00	10/2008	7.03%	0.20%
DEPRECIATION - Rate Area 26-00	26:334131:RA26-00	334100-Meters - 334131-Meter Reading Units	334.4-Meters & Meter Installs	1/1/2014 0:00	10/2008	7.03%	0.20%
DEPRECIATION - Rate Area 26-00	26:334200:RA26-00	334200-Meter Installations - None	334.4-Meters & Meter Installs	1/1/2014 0:00	10/2008	2.65%	0.08%
DEPRECIATION - Rate Area 26-00	26:334300:RA26-00	334300-Meter Vaults - None	334.4-Meters & Meter Installs	1/1/2016 0:00	01/2016	2.65%	0.08%
DEPRECIATION - Rate Area 26-00	26:335000:RA26-00	335000-Hydrants - None	335.4-Hydrants	1/1/2014 0:00	10/2008	1.97%	0.33%
DEPRECIATION - Rate Area 26-00	26:339200:RA26-00	339200-Other P/E-Supply - None	339.2-Oth Plt & Misc Equip-SS/PP	1/1/2014 0:00	06/2009	4.68%	0.00%
DEPRECIATION - Rate Area 26-00	26:339600:RA26-00	339600-Other P/E-CPS - None	339.1-Oth Plt & Misc Equip-Int	1/1/2014 0:00	06/2009	10.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:340100:RA26-00	340100-Office Furniture & Equip - None	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	1.39%	0.00%
DEPRECIATION - Rate Area 26-00	26:340200:RA26-00	340200-Comp & Periph Equip - 340200-Comp & Peri	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	2.19%	0.00%
DEPRECIATION - Rate Area 26-00	26:340210:RA26-00	340200-Comp & Periph Equip - 340210-Comp & Peri	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	2.19%	0.00%
DEPRECIATION - Rate Area 26-00	26:340220:RA26-00	340200-Comp & Periph Equip - 340220-Comp & Peri	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	2.19%	0.00%
DEPRECIATION - Rate Area 26-00	26:340230:RA26-00	340200-Comp & Periph Equip - 340230-Comp & Peri	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	2.19%	0.00%
DEPRECIATION - Rate Area 26-00	26:340240:RA26-00	340200-Comp & Periph Equip - 340240-Comp & Peri	340.5-Office Furniture & Equip	1/1/2014 0:00	03/2010	2.19%	0.00%
DEPRECIATION - Rate Area 26-00	26:340300:RA26-00	340300-Computer Software - 340300-Computer Soft	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	1.83%	0.00%
DEPRECIATION - Rate Area 26-00	26:340310:RA26-00	340300-Computer Software - 340310-Comp Softwar	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	1.83%	0.00%
DEPRECIATION - Rate Area 26-00	26:340315:RA26-00	340300-Computer Software - 340315-Comp Softwar	340.5-Office Furniture & Equip	1/1/2014 0:00	11/2012	10.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:340320:RA26-00	340300-Computer Software - 340320-Comp Softwar	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	1.83%	0.00%
DEPRECIATION - Rate Area 26-00	26:340330:RA26-00	340300-Computer Software - 340330-Comp Softwar	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	1.83%	0.00%
DEPRECIATION - Rate Area 26-00	26:340400:RA26-00	340400-Data Handling Equipment - None	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	4.94%	0.00%
DEPRECIATION - Rate Area 26-00	26:340500:RA26-00	340500-Other Office Equipment - None	340.5-Office Furniture & Equip	1/1/2014 0:00	10/2008	1.39%	0.00%
DEPRECIATION - Rate Area 26-00	26:341100:RA26-00	341100-Trans Equip Lt Duty Trks - None	341.5-Transportation Equip	1/1/2014 0:00	10/2008	18.82%	-2.82%
DEPRECIATION - Rate Area 26-00	26:341200:RA26-00	341200-Trans Equip Hvy Duty Trks - None	341.5-Transportation Equip	1/1/2014 0:00	10/2008	19.55%	-2.93%
DEPRECIATION - Rate Area 26-00	26:341300:RA26-00	341300-Trans Equip Autos - None	341.5-Transportation Equip	1/1/2014 0:00	10/2008	13.39%	-2.01%
DEPRECIATION - Rate Area 26-00	26:341400:RA26-00	341400-Trans Equip Other - None	341.5-Transportation Equip	1/1/2014 0:00	10/2008	8.52%	-1.28%
DEPRECIATION - Rate Area 26-00	26:342000:RA26-00	342000-Stores Equipment - None	342.5-Stores Equipment	1/1/2014 0:00	05/2009	4.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:343000:RA26-00	343000-Tools,Shop,Garage Equip - None	343.5-Tools, Shop & Garage Equip	1/1/2014 0:00	10/2008	6.89%	0.00%
DEPRECIATION - Rate Area 26-00	26:344000:RA26-00	344000-Laboratory Equipment - None	344.5-Laboratory Equipment	1/1/2014 0:00	10/2008	1.01%	0.00%
DEPRECIATION - Rate Area 26-00	26:345000:RA26-00	345000-Power Operated Equipment - None	345.5-Power Operated Equip	1/1/2014 0:00	09/2009	7.03%	0.00%
DEPRECIATION - Rate Area 26-00	26:346100:RA26-00	346100-Comm Equip Non-Telephone - None	346.5-Communication Equip	1/1/2014 0:00	10/2008	4.21%	0.00%
DEPRECIATION - Rate Area 26-00	26:346190:RA26-00	346190-Remote Control & Instrument - None	346.5-Communication Equip	1/1/2014 0:00	10/2008	4.21%	0.00%
DEPRECIATION - Rate Area 26-00	26:346200:RA26-00	346200-Comm Equip Telephone - None	346.5-Communication Equip	1/1/2014 0:00	10/2008	3.51%	0.00%
DEPRECIATION - Rate Area 26-00	26:347000:RA26-00	347000-Misc Equipment - None	347.5-Misc Equip	1/1/2014 0:00	10/2008	6.33%	0.00%
DEPRECIATION - Rate Area 26-00	26:348000:RA26-00	348000-Other Tangible Property - None	348.5-Other Tangible Plant	1/1/2014 0:00	10/2008	5.10%	0.00%
DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM	303500-Land & Land Rights-T&D - 303502-Rights of	303.4-Land & LR-T&D	1/1/2014 0:00	01/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM	303500-Land & Land Rights-T&D - 303500-Land & Ld	303.4-Land & LR-T&D	1/1/2014 0:00	01/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM	303600-Land & Land Rights-General - None	303.5-Land & LR-GP	1/1/2014 0:00	01/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM	303300-Land & Land Rights-Pumping - None	303.2-Land & LR-SS & PP	1/1/2014 0:00	01/2008	0.00%	0.00%

DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM	303400-Land & Land Rights-Treatment - None	303.3-Land & LR-WT	1/1/2014 0:00	01/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM	303500-Land & Land Rights-T&D - 303501-Land-TD	303.4-Land & LR-T&D	1/1/2014 0:00	01/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-00	26:Non Depreciable-Tennessee-AM0	301000-Organization - None	301.1-Organization	1/1/2014 0:00	01/2008	0.00%	0.00%
DEPRECIATION - Rate Area 26-02	26:339200:RA26-02	339200-Other P/E-Supply - None	339.2-Oth Plt & Misc Equip-SS/PP	1/1/2014 0:00	03/2012	4.68%	0.00%
DEPRECIATION - Rate Area 26-02	26:339600:RA26-02	339600-Other P/E-CPS - None	339.1-Oth Plt & Misc Equip-Int	1/1/2014 0:00	03/2012	10.00%	0.00%
DEPRECIATION - Rate Area 26-02	26:342000:RA26-02	342000-Stores Equipment - None	342.5-Stores Equipment	1/1/2014 0:00	03/2012	4.00%	0.00%
DEPRECIATION - Rate Area 26-02	26:345000:RA26-02	345000-Power Operated Equipment - None	345.5-Power Operated Equip	1/1/2014 0:00	03/2012	7.03%	0.00%

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **R. Kevin Kruchinski**

2. Provide the dates and times of any meetings with the Staff of the Tennessee Public Utility Commission where the prospects for the acquisition of Jasper Highlands was discussed. Identify all attendees.

Response:

Tennessee American Water Company is not aware of any meetings with the Staff of the Tennessee Public Utility Commission where the prospects for the acquisition of Jasper Highlands was discussed.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Kevin Kruchinski**

3. Refer to the billed and metered usage of water sales to Jasper Highlands that was provided in response to Item 25 of the TPUC's first data request. A quick review of this data indicates a lost and unaccounted-for water sales ratio of approximately 44%. This material loss factor is especially concerning for a relatively new system. Explain the reason for this loss factor and how TAWC intends to address and remedy its cause.

Response:

The data in response to Item 25 of the Commission's first data request was incorrect. Please refer to the supplemental response filed December 14, 2018. The Total Usage Billed to Customers was not inclusive of all billed accounts. The value for Total Metered Usage was the actual billed usage for all accounts.

TAWC will carefully monitor purchased water and billed water accounts to ensure the values align with a well-managed system based upon the system conditions. It is understood that Thunder Air has utilized flushing in an effort to manage water quality within the water system. TAWC may utilize SCADA to help optimize flushing in an effort to balance water quality and accounted for water. TAWC may also conduct acoustic leak monitoring if conditions warrant along with other techniques based upon the need.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Kevin Kruchinski**

4. Provide TAWC's anticipated capital expenditures at Jasper Highlands by year for the next three years by NARUC account. Also segregate these capital expenditures between system upgrades and service to new customers.

Response:

The below plan may be adjusted based upon new customer growth rate and potential to realize efficiencies through SCADA. Maintenance capital is defined as unknown capital replacements due to premature failures- pump failures, water main breaks, service leaks, etc.

Year	Capital Expenditure	NARUC Account #	Classification	Approximate Cost
2019	Meter replacements	334100	System Upgrades	\$20,000
2019	New Meters	334100	New Customers	\$3,000
2019	New Water service	333000	New Customers	\$4,000
2019	Total			\$27,000
2020	SCADA Improvements	347000	System Upgrades	\$45,000
2020	New Meters	334100	New Customers	\$10,000
2020	New Water Services	333000	New Customers	\$23,000
2020	Total			\$78,000
2021	New Meters	334100	New Customers	\$15,000
2021	New Water Services	333000	New Customers	\$75,000
2021	Maintenance Capital	Not defined	System upgrades	\$15,000
2021	Total			\$105,000

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness:

5. Provide TAWC's anticipated customer additions at Jasper Highlands by year for the next three years by customer classification (residential, commercial, etc.).

Response:

Please refer to the response to Item 16 of the Commission's first data request, filed November 27, 2018. All customer additions are projected to be residential.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Valoria V. Armstrong**

6. Refer to Page 5 of TAWC witness Armstrong's testimony where she states the following:

Shared resources through management and operations of the system creates efficiencies that are passed along to customers through expense saving. Thunder Air Inc. will benefit from TAWC economies of scale.

Is it the intent of TAWC to have its existing customers subsidize the rates of Thunder Air, Inc? If not, provide a comprehensive analysis of how Thunder Air Inc. will benefit from TAWC's economies of scale.

Response:

No, it is not the intent of TAWC to have its existing customers subsidize the rates of Thunder Air, Inc. The existing customers of Thunder Air, Inc., however, will be able to benefit from TAWC's economies of scale in a number of ways. Thunder Air, Inc. customers will benefit from both Tennessee American and American Water's expertise and existing support systems for management and administration of billing, collections, customer service and emergency response with 24/7 access to the American Water call center and additional operational support during emergencies including severe weather events. As Tennessee American customers, the system currently operated by Thunder Air, Inc. will benefit from corporate American Water's purchasing strength to buy chemicals, materials and supplies at a reduced amount. Thunder Air, Inc customers will benefit from Tennessee American's professional engineering and operations staff of technicians, mechanics, environmental experts and regulatory personnel, which will be able to develop economical solutions to issues and help offset inflationary pressure over time. As capital improvements and upgrades are required, Joint Applicants believe Tennessee American and affiliated companies have the engineering and operational knowledge to make those improvements and upgrades in a cost effective, efficient manner. Thunder Air, Inc. customers will also benefit from improved access to capital through American Water.

**TENNESSEE AMERICAN WATER COMPANY
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THIRD (INFORMAL) DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Kevin Kruchinski**

7. Refer to Page 7 of TAWC witness Kruchinski's testimony where he states the following:

After several discussions and meetings representing arms-length negotiations, we arrived at a purchase price of \$1,500,000. The purchase price is supported by the current water rates and is less than the depreciated book value of the system.

Provide the support for the statement that the "...purchase price is supported by the current water rates."

Response:

Please reference the attachment to Item 16 of the Commission's first data request, filed November 27, 2018. The attachment includes an Income Statement that produces a small positive net income in 2019, a larger positive net income in 2020 based on customer growth and full capitalization of rate base only in 2021. A higher purchase price and therefore higher rate base would require a higher revenue requirement. In order to meet a higher revenue requirement, TAWC would need to raise rates.

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION

Responsible Witness:

8. Provide a side-by-side comparison of the gross and net water plant of both TAWC and Thunder Air, Inc. at December 31, 2017, in the following table.

	TAWC	Thunder Air
Gross Plant in Service		
Accumulated Depreciation		
Net Plant		
End of Period Customers		
Net Plant per Customer		

Response:

As of December 31st 2017		
	TAWC	Thunder Air
Gross Utility Plant in Service	\$ 312,344,667	\$ 4,584,291
Construction Work in Progress	\$ 4,065,376	\$ -
Accumulated Depreciation	\$ 89,805,736)	\$ (164,465)
Net Plant	\$ 226,604,307	\$ 4,419,826
End of Period Customers	80,291	60
Net Plant per Customer	\$ 2,822	\$ 73,664

**TENNESSEE AMERICAN WATER COMPANY
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THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

9. Refer to Page 6 of TAWC witness Bridwell's testimony where she states the following:

Additionally, Tennessee American is further proposing to begin amortization of the costs of \$10,000 or less immediately upon closing, with only the unamortized balance of the regulatory asset to be addressed in the next rate case.

Over what period is TAWC proposing to amortize these costs? Provide the source and support for this amortization period.

Response:

TAWC would propose to amortize the costs over 10 years. Transaction cost expense amortizations should be reviewed on an individual transaction basis.

**TENNESSEE AMERICAN WATER COMPANY
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THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

10. Refer to the TAWC's response to Item 8 of the Consumer Advocate's second data request which reads as follows:

Tennessee American would begin applying the Capital Riders and Production cost rider, to all Jasper Highlands customers on the first day of service. The Capital Riders and the Production Cost rider would be applied at the authorized rates. In order to maintain Jasper Highlands current rates, TAWC is proposing to reduce Jasper Highlands base rates from the current rates in the amount of the currently authorized Capital Riders and Production cost riders. The tariff filed on September 7, 2018 will be revised to reflect that reduction.

Provide a further discussion on the company's response that addresses the following points:

- a. The purpose of applying and simultaneously crediting a surcharge on the bills of Jasper Highland customers;
- b. Applying the Capital Riders surcharge to customers of Jasper Highlands when the Jasper Highlands system is relatively new and should not have the same need for infrastructure replacement that is required by the TAWC system; and
- c. Applying the Production Cost Rider to customers of Jasper Highlands when their source of water supply comes solely from the South Pittsburg water system.

Response:

- a. Tennessee American Water customers currently receive both a surcharge for the Capital Recovery Riders and Production Cost and Other Pass-throughs Rider ("PCOP"). TAWC is simply proposing to treat all customers equally with regard to the riders.
- b. While the system is relatively new and may not require the infrastructure replacement that is required in the existing TAWC system, the capital recovery riders include recovery of investment for economic development and safety and environmental compliance. The tariffs for the Capital Recovery Riders and the PCOP Rider do not limit applicability to certain customers, and do not apply different rates to different

customer classifications or tariff groups. The fundamental principle here is to allow recovery between rate cases, applied equally to all rate classes. Any distinction on recovery of assets would be applied during the cost of service study in the next rate case. Both the Capital Recovery Riders and the PCOP were applied to the City of Whitwell customers immediately upon merging those systems. TAWC is proposing to reduce Jasper Highlands customer base rates in the amount equal to the riders, so that there will be no change in their rates during the first year. TAWC believes it is appropriate to include all customers in the Riders going forward.

- c. Purchased water expense and Tennessee Public Utility Commission Inspection fee expense are both part of the PCOP rider and the purchases from the South Pittsburg water system would be included on a going forward basis, similar to the production expenses for the City of Whitwell.

**TENNESSEE AMERICAN WATER COMPANY
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CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell/R. Kevin Kruchinski**

11. Refer to Thunder Air's response to Item 13 of the Consumer Advocate's second data request regarding historic O&M expenses for Jasper Highlands. In addition, refer to TAWC's response to Item 24 of the Tennessee Public Utility Commission's data request regarding historic purchased water expense for Jasper Highlands. Provide a monthly side-by-side comparison of Thunder Air's O&M expenses (including purchased water cost) with a pro forma budget of TAWC's anticipated O&M expenses for Jasper Highlands for each month of 2019 classified by expense category in accordance with the Uniform System of Accounts.

Response:

The requested information does not exist, as TAWC does not have a pro forma budget of its anticipated O&M expenses for Jasper Highlands for each month of 2019 classified by expense category. Therefore, TAWC objects to this Request to the extent it purports to place obligations on TAWC that are broader than the scope contemplated by the Tennessee Rules of Civil Procedure and other applicable law because the information simply does not exist. Subject to and without waiving the foregoing objection, TAWC states as follows:

Below is a side by side comparison of TAWC's projected expenses for 2019 as reflected in response to Item 16 of the Commission's first data request filed November 27, 2018, and Thunder Air Inc., annualized for the 9 months ended on September 30, 2018 based on the Income Statement provided by Thunder Air Inc in Collective Exhibit B in response to the CPAD's first data request filed on November 6, 2018. Tennessee American's expenses differ slightly due to a recognition for depreciation, calculation of taxes, and an estimate of labor costs.

Operations & Maintenance Expense		TAWC Project	Thunder Air*
	Production Cost	39,734	88,109
	Employee Related Expense	24,214	-
	Maintenance	30,850	23,536
	Miscellaneous	16,912	995
	Depreciation & Amortization*	27,143	-
	General Taxes	30,073	-
Total Operating Expenses		168,926	112,639

**TENNESSEE AMERICAN WATER COMPANY
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CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

12. Refer to Thunder Air's response to Item 24 of the Consumer Advocate's second data request regarding current rates for Jasper Highlands. Provide a side-by-side comparison of the current rates (customer and usage charges along with miscellaneous fees and charges) for Jasper Highlands and TAWC.

Response:

Please refer to the response to Item 26 of the Commission's first data request filed on November 27, 2018 for side-by-side comparison of fees. A comparison of rates and usage charges for residential customers is listed below:

Jasper Highlands (usage)	Jasper Highlands (rates)	TAWC – Chattanooga General Water Service Charge for Residential customers	TAWC – Chattanooga General Water Service (usage)	TAWC – Chattanooga General Water Service Volumetric Rates
Minimum Bill up to (2,500 gallons)	\$67.50	5/8" - \$13.96	0 – 3,00 gallons	\$0.03566/100 gallons
2,500 – 5,000	\$1.70/100		3,000 - 48,600 gallons	\$0.56555/100 gallons
5,001 – 7,500	\$1.51/100		48,600-374,000 gallons	\$0.35531/100 gallons
Over 7,500	\$1.35/100		374,000-3,740,000 gallons	\$0.26564/100 gallons
			3,740,000-11,200,000 gallons	\$0.20305/100 gallons
			Over 11,200,000 gallons	\$0.12057/100 gallons

**TENNESSEE AMERICAN WATER COMPANY
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CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

13. Refer to the spreadsheet included as an attachment to Item 16 of the Tennessee Public Utility Commission's first data request regarding budgeted financial statements for 2019, 2020 and 2021. It appears that the formulas included in this spreadsheet refer to other data not included with the response. Provide the source and support for all data referenced in this spreadsheet. Include documentation for all assumptions used in developing this forecast with your response.

Response:

With reference to the data in the response to Item 16 of the Tennessee Public Utility Commission's first data request regarding budgeted financial statements, below is the source and support information for the data referenced in the spreadsheet:

Water Revenue - Revenue is calculated based on the fixed charges and volumetric charges. This assumes additional customers as described in the response to Item 16 of the TPUC's first data request filed November 27, 2018. The assumption is that all customers are Residential with the average monthly usage of 5,500 gallons of water. The fixed and volumetric charges are calculated at the existing rates

Production Costs – The projected Production cost expense is made up of Purchased Water, \$ 32,186 and Fuel & Power expense, \$ 7,548. Purchased Water has been projected using the entity's 2017 total water usage and water administration expense of \$20,391 added an estimate of \$3,150 and 3% for Inflation (For 2019, the calculation would be $((20391/9*12) + 3150)*103\%^2$) Fuel and Power expense is similarly calculated by annualizing the entity's 2017 Pump House Utilities expense of \$ 5,507 and applying the inflation rate of 1.39%.

Employee Related Expense - The assumption is 1/3 of the Supervisor's time with the assumption of annual Salary of \$63k plus AIP of 10% and merit of 2.9%. Initially the current Whitwell Supervisor, with a shift in other workload the supervisor is responsible for, which may require contract services, would cover this. The merit increase applies year over year (For 2019 the calculation would be $\$ 63,000*.33*1.1*102.9\%^2$).

Maintenance - Assumed entity's 2017 expense of Maintenance annualized it and estimated additional \$ 8,000 for other maintenance expenses adjusted for the inflation rate of 2.19% for 2 years. (For 2019, the calculation would be $((14625+301+1229)/9*12) + 8000)*102.19\%^2$)

Also added additional \$ 5,000 for other maintenance expense in Year 2021

Miscellaneous - The Miscellaneous expense include Shared Business Services, Customer Accounting, Insurance Other Than Group and General Office Expense. These expenses are allocated approximately 50%, 20%, 20% and 10% respectively.
Also added \$4,500 of additional miscellaneous expense in Year 2021.

Depreciation & Amortization - Depreciation calculated at the Composite depreciable life of 57 years utilizing composite depreciation of 1.76%.

General Taxes - General Taxes calculated for Gross Receipts, Franchise & Excise, Property and Payroll taxes. The Asset based tax rates are estimated at 1.71% and the Revenue based taxes are estimated at 1.18%.

Interest Expense - The assumption is that the whole project is funded by Debt for the first 2 years and for year 3 assumed the authorized Capitalization structure 65/35 Debt/Equity. The interest rates are assumed 3.26%, 3.52% and 3.71% for Years 2019, 2020 and 2021 respectively.

Provision for Taxes – Taxes are assumed at the rate of 26.1%

Utility Plant – Assumes the Purchase price and year over year additions. The calculation also assumes Retirements at the rate of 5% of Additions.

Accumulated Depreciation - Depreciation calculated at the Composite depreciable life after adjusting the retirements.

Utility customer accounts receivable - Calculated based on the daily average revenue and estimated 40 Days of Receivable from customers.

Materials and supplies - Operating expense converted to a daily expense by dividing by 365, then multiplying by an estimated 5 days of Inventory on Hand.

Common stockholder's equity – Assuming the authorized Capitalization structure from Year 3.

Accounts Payable - Calculated based on the Operating expenses divided by 365 to convert to Daily average, and an estimated 30 Days of Payable

Deferred Income Taxes – Calculated assuming State and Federal Tax rates for the difference between the Book and Tax Basis using an estimated 5% tax depreciation rate.

**TENNESSEE AMERICAN WATER COMPANY
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CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

14. Refer to the Company's response to Item 17 of the Tennessee Public Utility Commission's first data request regarding incremental upgrades for meters and SCADA once the acquisition is completed. Provide a reconciliation of where these incremental upgrades are included on TAWC's budgeted financial statements for 2019, 2020, and 2021 that are included on Item 16 of the Tennessee Public Utility Commission's first data request.

Response:

Incremental Upgrades

Incremental Upgrades as per the Cash Flow Statement reflected on page of three of the attachment to Item 16 of the response to the Commission's first data request filed November 27, 2018:

Year	Amount	
2019	\$27,143	Meter Replacements & New Meters and Water Services
2020	\$78,079	SCADA & New Meters and Water Services
2021	\$104,750	New Meters and Water Services & Other Maintenance projects

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

15. Provide a copy of all workpapers of the parties in support of the acquisition that have not already been placed in the record.

Response:

TAWC objects to this Request as overly broad and unduly burdensome. Further, TAWC objects to this Request to the extent it purports to place obligations on TAWC that are broader than the scope contemplated by the Tennessee Rules of Civil Procedure and other applicable law. Subject to and without waiving the foregoing objection, TAWC states as follows:

TAWC believes that all workpapers in support of the acquisition petition have been provided in this Docket.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Linda C. Bridwell**

16. Provide a schedule showing any ongoing incremental costs that TAWC expects to incur after the acquisition closes.

Response:

Please refer to the response to Item 16 of the Commission's first data request filed on November 27, 2018 for financial statements including projected expenses. TAWC does not expect to incur any ongoing incremental costs beyond the normal operational expenses.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 18-00099
THIRD DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: **Kevin Kruchinski**

17. Does TAWC intend to physically interconnect its existing distribution system to the Jasper Highlands system? If so, describe how and when this interconnection would take place and at what cost.

Response:

TAWC does not have any plans to physically connect its existing distribution system to the Jasper Highlands system.

STATE OF Tennessee)
)
COUNTY OF Hamilton)

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared R Kevin Kruchinski, being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of Tennessee-American Water Company before the Tennessee Public Utility Commission, and duly sworn, verifies that the data requests and discovery responses are accurate to the best of his knowledge.

R. K. Kruchinski
R Kevin Kruchinski

Sworn to and subscribed before me
this 14 day of December, 2018.

Kathryn Hart
Notary Public

My Commission Expires: 9-27-2020



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 duly sworn, verifies that the data requests and discovery responses are accurate to the best of her knowledge.

Linda C. Bridwell
Linda C. Bridwell

Sworn to and subscribed before me
this 14 day of December, 2018.

Christina J. Caprio
Notary Public

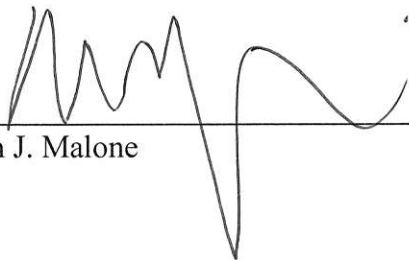
My Commission Expires: 8/6/2022

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:

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

This the 14th day of December, 2018.



Melvin J. Malone