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December 17, 2018

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

On November 27, 2018, the Joint Petitioners submitted *Joint Petitioners' Responses to TPUC Staff Data Request Nos. 12 and 13* in the above-captioned matter. These two responses should have been submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Therefore, attached for filing please find *Joint Petitioners' Revised Responses to TPUC Staff Data Request Nos. 12 and 13*, which are being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, CONFIDENTIAL version of Response Nos. 12 and 13 are attached.

For the foregoing reasons, we respectfully request that the responses to Staff Data Request Nos. 12 and 13 be immediately removed from TPUC's website.

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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**TENNESSEE AMERICAN WATER COMPANY/THUNDER AIR, INC.  
DOCKET NO. 18-00099  
FIRST DATA REQUEST OF THE  
TENNESSEE PUBLIC UTILITY COMMISSION**

**Responsible Witness:**        **Dane Bradshaw**

**Question:**

12.    Provide a copy of the 2017 tax returns for the water system being transferred from Thunder Air, Inc. to TAWC and for Thunder Air Inc.

**Response:**

Thunder Air, Inc. very much understands and appreciates the Commission's duties and responsibilities with respect to the Joint Petition and, along with TAWC, respects the necessary information gathering process. As demonstrated in this case, Thunder Air, Inc. has been very responsive to both discovery and data requests alike. Notwithstanding the foregoing, without some additional clarification, it appears that this particular data request is unreasonably broad, extremely burdensome and not relevant. For these, among other reasons, Thunder Air, Inc. respectfully objects to this request as submitted. In the spirit of cooperation and in an attempt to be responsive to the Commission, however, Thunder Air, Inc. submits, without objection, a copy of the 2017 tax returns for the water system being transferred from Thunder Air, Inc.

**TENNESSEE AMERICAN WATER COMPANY/THUNDER AIR, INC.**  
**DOCKET NO. 18-00099**  
**FIRST DATA REQUEST OF THE**  
**TENNESSEE PUBLIC UTILITY COMMISSION**

**Responsible Witness:**        **Dane Bradshaw**

**Question:**

13.    Provide financial statements, including balance sheets, income statements and statements of cash flows for the past three years of the water system being transferred to TAWC.

**Response:**

Please see the attached.