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December 18, 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 *Joint Petitioners' Supplemental Response to TPUC Staff First Data Request No. 25*, which was issued on November 9, 2018, 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

Attachment

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

*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

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BUTLER SNOW LLP

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:

25. Provide the total number of gallons billed to customers by month for each of the past twelve months.

Response:

<u>Reading</u>	<u>Invoice</u>	<u>Total Usage Billed to Customers</u>	<u>Total Metered Usage</u>
Nov-17	Dec-17	285,740	406,710
Dec-17	Jan-18	105,330	208,110
Jan-18	Feb-18	88,940	244,680
Feb-18	Mar-18	87,380	257,470
Mar-18	Apr-18	106,090	420,070
Apr-18	May-18	152,990	423,130
May-18	Jun-18	596,840	962,690
Jun-18	Jul-18	902,420	1,197,480
Jul-18	Aug-18	668,900	1,141,060
Aug-18	Sep-18	704,370	1,319,560
Sep-18	Oct-18	630,210	1,061,050
Oct-18	Nov-18	468,170	983,520

Supplemental Response Filed December 17, 2018:

Due to a formulaic error, the original response as filed was incorrect. The original response identified "Total Metered Usage" and calculated all usage read on the customers' meters of Thunder Air Inc. That column is not the amount of water purchased from South Pittsburg. These meter readings are also the total amount of usage being billed to customers. Therefore, the response as corrected is:

<u>Reading</u>	<u>Invoice</u>	<u>Total Usage Billed to Customers</u>
Nov-17	Dec-17	406,710
Dec-17	Jan-18	208,110
Jan-18	Feb-18	244,680
Feb-18	Mar-18	257,470
Mar-18	Apr-18	420,070
Apr-18	May-18	423,130
May-18	Jun-18	962,690
Jun-18	Jul-18	1,197,480
Jul-18	Aug-18	1,141,060
Aug-18	Sep-18	1,319,560
Sep-18	Oct-18	1,061,050
Oct-18	Nov-18	983,520

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 Dane Bradshaw, being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of Thunder Air, Inc. 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.



Dane Bradshaw

Sworn to and subscribed before me
this 18th day of December 2018.



Maggie K. Lewis
Notary Public

My Commission Expires: 01/12/2019

MY COMMISSION EXPIRES:
JANUARY 12, 2019