

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF TENNESSEE)	
WASTEWATER SYSTEMS, INC., TO)	DOCKET NO. 18-00107
AMEND ITS CERTIFICATE OF)	
CONVENIENCE AND NECESSITY)	

**TENNESSEE WASTEWATER SYSTEMS, INC.'S RESPONSE TO THE CONSUMER
ADVOCATE'S SECOND DISCOVERY REQUEST
TO TENNESSEE WASTEWATER SYSTEMS, INC.**

RESPONSES

1-1. Refer to the Company's Response to TPUC DR No. 2-13. Specifically, refer to the statement of profit and loss for the year ending December 2018 page. Provide the Company's reasoning for booking \$205,250 in account 421 Non-Utility Income, subaccount 421.5 Developer Income, when TPUC's Final Order in Docket No. 16-00139 held that developer income should be considered regulated revenue.¹

RESPONSE: The amounts booked prior to July 23, 2018 were done before the completion of the TPUC staff's audit (Docket 18-00071) during which the Company and staff continued discussions as to how Developer Income was to be booked (See Finding No. 5). The entries after July 23, 2018 are mistaken and should have been booked as regulated income. The Company experienced personnel changes in October (when the other revenues were booked) and the person who inherited the responsibility of booking the revenues followed the procedure as to how the revenue was previously booked. The

Company has since developed policies and procedures for booking Developer Income and allocating expenses consistent with the Audit findings.

1-2. Please identify each person who you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert witness:

- (a) Identify the field in which the witness is to be offered as an expert;
- (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
- (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
- (d) Provide the grounds for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;
- (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
- (h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, work papers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE: At this time, TWSI does not anticipate calling any expert witnesses. Should the need arise to do so, TWSI will supplement this response and provide the relevant, requested information to the Advocate in this docket.

1-3. Please identify all persons having knowledge of discoverable matters in this case.

RESPONSE:

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931-245-0037

- 1-4. Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE: See Exhibit 4.

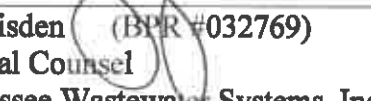
- 1-5. Please produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits in this docket.

RESPONSE: There are presently no plans to introduce any exhibits at the hearing on the merits in this docket that have not already been provided in this docket. Should that change, exhibits will be produced in accordance with any pre-hearing agreements or orders.

- 1-6. Please produce copies of all documents -- including, without limitation, work papers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- relied upon by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE: All documents have been produced as exhibits in this docket. If that should change, any supplemental information will be filed in this docket or provided in accordance with any pre-hearing agreements or orders.

RESPECTFULLY SUBMITTED,



Jeff Riden (BPR #032769)
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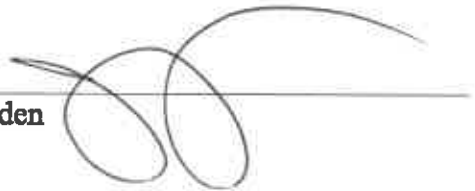
CERTIFICATE OF SERVICE

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

Karen H. Stachowski
Assistant Attorney General
Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Group
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-2370
Karen.Stachowski@ag.tn.gov

This the 8th day of March 2019.

Jeff Riden

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right, positioned over a horizontal line.