

STATE OF TENNESSEE

Office of the Attorney General



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May 15, 2020

Hon. Robin L. Morrison, Chairperson
c/o Sharla Dillon
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: *Joint Petition of Tennessee Wastewater Systems, Inc. and TPUC Staff (As A Party) to Increase Rates and Charges*, TPUC Docket No. 20-00009.

Dear Chairperson Morrison:

Since the submission of the Joint Petition in the above-referenced matter on January 23, 2020, TPUC Party Staff, Tennessee Wastewater Systems, Inc. (TWSI), and the Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office (Consumer Advocate or CA) have been involved in cooperative discussions and have exchanged various information related to the Joint Petition. With the recent submission of a proposed revised tariff and supplemental testimony¹ of Kevin McClenahan, Joe Shirley and Suzanne Christman, the parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer. The Consumer Advocate will not be filing direct testimony nor will TPUC Party Staff or TWSI be filing rebuttal testimony.

Moreover, after considering the entire record, it is the joint position of the parties that this matter is ripe for consideration on the merits by the Tennessee Public Utility Commission (TPUC or Commission). At this time, there remain no outstanding disputes between the parties with respect to this Docket, as clarified by and through the parties' communications and pre-filed testimony. As reflected in the pre-filed supplemental testimony, the Parties engaged in "substantive discussions" resulting in "certain revisions in the requested relief in this docket."² Accordingly, there are no contested issues between the parties on the merits of the Joint Petition, and it is the position of the parties that this matter should be resolved in favor of the positions set forth in Joint Petition, consistent

¹ The Consumer Advocate was provided the opportunity to review and provide comment on the draft supplemental testimony, exhibits and proposed tariff prior to the filing of such documents with the Commission.

² Supplemental Testimony of Joe Shirley, p.2, ll. 10-15, TPUC Docket No. 20-00009 (May 14, 2020).

with the pre-filed testimony of the parties. Consistent with agency practice, the parties hereby jointly request that the entire official record in this docket, including discovery, be made a part of the evidentiary record.

With the foregoing in mind, unless otherwise requested by the Commission, the Parties hereby waive both opening statements, the live presentation of testimony, and cross-examination of witnesses by the Parties. Witnesses of the parties will be available for the Hearing on the merits. Further, other than follow-up and/or clarifying questions in response to questions of any witness by a TPUC Commissioner or TPUC Staff, the Parties also waive cross-examination of its witnesses.

As required, an original of this filing, along with four hard copies will follow. Should you have any questions concerning this filing, or additional information, please do not hesitate to contact me.

Respectfully,



Karen H. Stachowski
Assistant Attorney General

cc: Ryan McGehee, TPUC
Jeff Riden, TWSI