

BUTLER ISNOW

Electronically Filed in TPUC Docket Room on March 18, 2020 at 1:58 p.m.

March 18, 2020

VIA EMAIL AND HAND DELIVERY

Hon. Robin L. Morrison, Chairman
c/o Ectory Lawless, Docket Room Manager
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 the Approval of an Asset Purchase Agreement and for the Issuance of a Certification of Convenience and Necessity; Docket No. 20-00011***

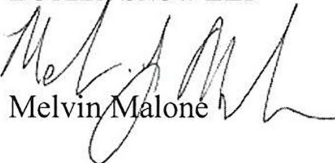
Dear Chairman Morrison:

Attached for filing please find *Tennessee-American Water Company and Thunder Air, Inc. d/b/a Jasper Highlands Development, Inc. 's Response to the First Discovery Requests of the Consumer Protection and Advocate Division* for Discovery Request 1-18 in the above-captioned matter. Please note that the attachment to the response for DR 1-18 is being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of the attachment to the response for DR 1-18 are enclosed. The other outstanding responses, DR 1-13 are 1-15, are not included in this filing and will be filed with the Commission at a later date.

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.

Sincerely,

BUTLER SNOW LLP


Melvin Malone

MJM:mcb

cc: Daniel Whitaker, Consumer Protection and Advocate Division

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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. 20-00011

**TENNESSEE-AMERICAN WATER COMPANY’S RESPONSES
TO FIRST DISCOVERY REQUESTS OF
THE CONSUMER ADVOCATE**

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Responses to the First Discovery Requests propounded by the Consumer Advocate Unit in the Financial Division of the Attorney General’s Office (“Consumer Advocate”).

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 “Authority”).

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, speculative, unduly burdensome, irrelevant 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 Consumer Advocate's discovery requests.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 20-00011
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE AND PROTECTION DIVISION**

Responsible Witness: Dane Bradshaw, Thunder Air Inc.

Question:

1-18. Provide copies of the water bills from South Pittsburg to Thunder Air for each month of 2018 and 2019.

Response:

Please see attached, which is being submitted **UNDER SEAL as CONFIDENTIAL and PROPRIETARY**. The bills for 9/5/2018 and 10/3/2018 are not enclosed. Thunder Air Inc. requested Marion Natural Gas & Board of Water Works ("MNG") to provide the bills for this period, but MNG was only able to provide a printout of Thunder Air Inc.'s account that shows the timeframe for the missing bills. This printout is also attached behind the water bills.

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
12/06/17	1/03/18	1/08/18	2/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
15693 88152	16071 91310	37800 315800	WATER WATER	.00 1388.00
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1388.00
			PENALTY IF LATE	138.80
			AMOUNT DUE IF LATE	1526.80



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
1/03/18	2/06/18	2/12/18	3/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
16071 91310	16414 95237	34300 392700	WATER WATER	.00 1668.39
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1668.39
			PENALTY IF LATE	166.84
			AMOUNT DUE IF LATE	1835.23

FEB 16 2018



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
2/06/18	3/06/18	3/12/18	4/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
16414 95237	17128 98892	71400 365500	WATER WATER	.00 1706.21
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1706.21
			PENALTY IF LATE	170.62
			AMOUNT DUE IF LATE	1876.83

MAR 19 2018

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
3/06/18	4/04/18	4/11/18	5/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
17128 98892	17551 104086	42300 519400	WATER WATER	.00 2182.94
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	2182.94
			PENALTY IF LATE	218.29
			AMOUNT DUE IF LATE	2401.23

APR 16 2018

LOOK FOR THE 2017 WATER QUALITY
REPORT IN THE SP HUSTLER - 4/5/18



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
4/04/18	5/08/18	5/10/18	6/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
17551	18127	57600	WATER	.00
104086	110556	647000	WATER	2728.82
MAY 18 2018				
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	2728.82
			PENALTY IF LATE	272.88
			AMOUNT DUE IF LATE	3001.70



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
5/08/18	6/06/18	6/12/18	7/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
18127	19011	88400	WATER	.00
110556	121861	1130500	WATER	4693.45
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	4693.45
			PENALTY IF LATE	469.35
			AMOUNT DUE IF LATE	5162.80



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
6/06/18	7/03/18	7/10/18	8/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
19011	19966	95500	WATER	.00
121861	1133940	207900	WATER	5016.24
JUL 17 2018				
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	5016.24
			PENALTY IF LATE	501.62
			AMOUNT DUE IF LATE	5517.86



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
7/03/18	8/07/18	8/13/18	9/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
19966	21580	161400	WATER	.00
133940	154525	58500	WATER	8517.27
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	8517.27
			PENALTY IF LATE	851.73
			AMOUNT DUE IF LATE	9369.00



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
8/07/18	9/05/18	9/13/18	10/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
21580	23006	142600	WATER	.00
154525	172705	818000	WATER	7526.74
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	7526.74
			PENALTY IF LATE	752.67
			AMOUNT DUE IF LATE	8279.41

SEP 17 2018



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
10/03/18	11/06/18	11/13/18	12/04/18	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
23939	25041	110200	WATER	.00
184702	198779	407700	WATER	5835.63
NOV 16 2018			AMOUNT DUE	5835.63
			PENALTY IF LATE	583.56
			AMOUNT DUE IF LATE	6419.19
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1541.57
			PENALTY IF LATE	154.16
			AMOUNT DUE IF LATE	1695.73

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PAY ONLINE AT
WWW.SOUTHPITTSBURGHUTILITIES.COM

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
11/06/18	12/05/18	12/13/18	1/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
25041	25367	32600	WATER	.00
198779	202391	1361200	WATER	1541.57
DEC 20 2018			AMOUNT DUE	1541.57
			PENALTY IF LATE	154.16
			AMOUNT DUE IF LATE	1695.73
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1541.57
			PENALTY IF LATE	154.16
			AMOUNT DUE IF LATE	1695.73



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
12/05/18	1/08/19	1/11/19	2/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
25367	25610	24300	WATER	.00
202391	206025	363400	WATER	1518.26
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1518.26
			PENALTY IF LATE	151.83
			AMOUNT DUE IF LATE	1670.09

JAN 17 2019

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
1/08/19	2/07/19	2/12/19	3/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
25610	25849	23900	WATER	.00
206025	209045	302000	WATER	1282.19
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1282.19
			PENALTY IF LATE	128.22
			AMOUNT DUE IF LATE	1410.41

FEB 18 2019

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
3/06/19	4/03/19	4/12/19	5/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
26035	26269	23400	WATER	.00
211367	214321	295400	WATER	1255.07
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	1255.07
			PENALTY IF LATE	125.51
			AMOUNT DUE IF LATE	1380.58

APR 22 2019



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
4/03/19	5/07/19	5/10/19	6/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
26269 214321	26902 222353	63300 803200	WATER WATER	.00 3347.28
MAY 16 2019				
SEE REVERSE SIDE FOR IMPORTANT INFORMATION				AMOUNT DUE
				3347.28
				PENALTY IF LATE
				334.73
				AMOUNT DUE IF LATE
				3682.01



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
5/07/19	6/05/19	6/11/19	7/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
26902 222353	28187 236443	128500 409000	WATER WATER	.00 5910.50
JUN 17 2019				
SEE REVERSE SIDE FOR IMPORTANT INFORMATION				AMOUNT DUE
				5910.50
				PENALTY IF LATE
				591.05
				AMOUNT DUE IF LATE
				6501.55



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
6/05/19	7/08/19	7/10/19	8/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
28187 236443	29518 253455	133100 701200	WATER WATER	.00 7044.28
JUL 16 2019				
SEE REVERSE SIDE FOR IMPORTANT INFORMATION				AMOUNT DUE
				7044.28
				PENALTY IF LATE
				704.43
				AMOUNT DUE IF LATE
				7748.71



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
7/08/19	8/06/19	8/09/19	9/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
29518 253455	31262 272447	174400 899200	WATER WATER	.00 7958.40
AUG 20 2019				
SEE REVERSE SIDE FOR IMPORTANT INFORMATION				AMOUNT DUE
				7958.40
				PENALTY IF LATE
				795.84
				AMOUNT DUE IF LATE
				8754.24



ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
8/06/19	9/04/19	9/12/19	10/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
31262	33044	178200	WATER	.00
272447	295087	264000	WATER	9366.45
			SEP 24 2019	
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	9366.45
			PENALTY IF LATE	936.65
			AMOUNT DUE IF LATE	10303.10

09/19 |||||

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
9/04/19	10/08/19	10/10/19	11/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
33044	35150	210600	WATER	.00
295087	319974	488700	WATER	10348.58
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	10348.58
			PENALTY IF LATE	1034.86
			AMOUNT DUE IF LATE	11383.44

OCT 18 2019

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ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
10/08/19	11/05/19	11/08/19	12/04/19	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
35150	36004	85400	WATER	.00
319974	331050	107600	WATER	4594.51
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	4594.51
			PENALTY IF LATE	459.45
			AMOUNT DUE IF LATE	5053.96

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ACCOUNT NO.		SERVICE LOCATION		
006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
1/05/19	12/03/19	12/13/19	1/04/20	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
36004	36403	39900	WATER	.00
31050	336230	518000	WATER	2168.43
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	2168.43
			PENALTY IF LATE	216.84
			AMOUNT DUE IF LATE	2385.27

DEC 20 2019

ACCOUNT NO.		SERVICE LOCATION		
0006 05950				
PREVIOUS READING DATE	CURRENT READING DATE	PAYMENTS POSTED THRU	DUE DATE	
12/03/19	1/07/20	1/10/20	2/04/20	
PREVIOUS READING	CURRENT READING	CONSUMED	SERVICE DESCRIPTION	CHARGE AMOUNT
36403	36863	46000	WATER	.00
336230	342141	591100	WATER	2470.97
SEE REVERSE SIDE FOR IMPORTANT INFORMATION			AMOUNT DUE	2470.97
			PENALTY IF LATE	247.10
			AMOUNT DUE IF LATE	2718.07

JAN 22 2020



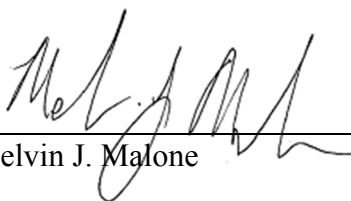
SFLCTL7		Consumer Information Display		3/09/20	
				09:57:57	
Route/Sequence		0006 05950		Consumer Code 01	
Service Location		TIMBER RIDGE DR		Consumer Name JASPER HIGHLANDS, POA	
Meter Type/Code		10 4 WATER		Press [Enter] to Return	
Status (A,D,X)		A			
Date	Reading	Usage	Net Charge	Rate 1	Rate 2
10/03/2018	184702	1199700	4976.51	4976.51	
9/05/2018	172705	1818000	7526.74	7526.74	

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 P. Whitaker III
Assistant Attorney General
Economic and Regulatory Section
Financial Division, Consumer Advocate Unit
Office of the Tennessee Attorney General
War Memorial Building, 2nd Floor
301 6th Avenue North
Nashville, TN 37243
Daniel.Whitaker@ag.tn.gov

This the 17th day of March, 2020.



Melvin J. Malone