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May 18, 2021

**VIA ELECTRONIC FILING**

Hon. Kenneth C. Hill, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

**RE: *Petition of Tennessee-American Water Company for Approval of the Establishment of a Regulatory Asset; Docket No. 20-00126***

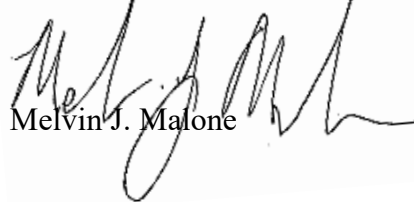
Dear Chairman Hill:

Attached for filing please find *Tennessee-American Water Company's Motion to Amend Procedural Schedule* in the above-captioned matter.

As required, one (1) hard copy will be mailed to your office. 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: Todd Wright, TAWC  
Karen H. Stachowski, Consumer Advocate Unit  
Vance Broemel, Consumer Advocate Unit

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BUTLER SNOW LLP

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

**PETITION OF TENNESSEE-  
AMERICAN WATER COMPANY FOR  
APPROVAL OF THE  
ESTABLISHMENT OF A  
REGULATORY ASSET**

**DOCKET NO. 20-00126**

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**TENNESSEE-AMERICAN WATER COMPANY’S MOTION  
TO AMEND PROCEDURAL SCHEDULE**

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Pursuant to Rules 1220-01-02-.06 (1) and 1220-01-02-.07 of the Tennessee Public Utility Commission’s Rules of Practice and Procedure, Tennessee-American Water Company (“Tennessee-American,” “TAWC” or the “Company”) respectfully submits this Motion to Amend Procedural Schedule in the above-captioned matter. For good cause shown, TAWC respectfully requests that the Commission grant its request.

**I. BACKGROUND**

On November 16, 2020, Tennessee-American submitted its petition in this matter, along with supporting documentation, including the Pre-filed Direct Testimony of TAWC Witness Elaine K. Chambers. The Commission granted the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General’s (“Consumer Advocate” or “CAU”) petition to intervene on January 7, 2021.

Pursuant to the request of the Hearing Officer, on or about March 4, 2021, the parties submitted a *Joint Proposed Procedural Schedule* in this matter. On March 30, 2021, the Hearing Officer issued the *Order Establishing Procedural Schedule*.

## II. ARGUMENTS

Since joining American Water Works Service Company (“AWW”) as Director, Rates and Regulatory for TAWC and Kentucky-American Water, Elaine Chambers has served as the lead Company witness in matters before the Commission, including its Capital Recovery Riders dockets. Unfortunately, Ms. Chambers voluntarily departed her position at AWW effective May 7, 2021. Under these unanticipated circumstances, Tennessee-American is hereby requesting that the current Procedural Schedule be amended to permit sufficient time for the Company to identify a substitute witness for Ms. Chambers. While the Company is acting expeditiously, it will nonetheless require some additional time for Ms. Chambers’ replacement to sufficiently review and absorb the petition, supporting documentation and other related materials, as well as handle all the other duties and responsibilities associated with this position .

As the petitioner in this case, the Company respectfully requests that the procedural schedule be amended due to the untimely departure of an essential member of TAWC’s regulatory team. TAWC submits the proposed modified procedural schedule below for consideration by the Commission.<sup>1</sup>

June 4, 2021  
July 12, 2021

TAWC’s Pre-Filed Rebuttal Testimony  
Target Hearing Date

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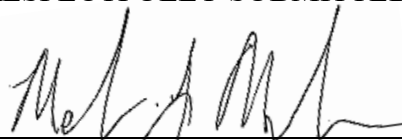
<sup>1</sup> Tennessee-American has informed the Consider Advocate Unit of both Ms. Chambers’ departure and of its need for an amended procedural schedule. The CAU does not oppose this motion and agrees with the proposed modified dates set forth herein.

### III. CONCLUSION

For the foregoing reasons, Tennessee-American respectfully requests the Commission to grant its Motion to Amend Procedural Schedule.

This the 18<sup>th</sup> day of May 2021.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read 'Melvin J. Malone', is written over a horizontal line.

MELVIN J. MALONE (BPR #013874)

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Attorneys for Tennessee-American Water Company

Dated: May 18, 2021

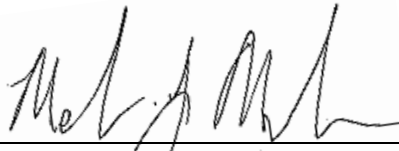
CERTIFICATE OF SERVICE

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

Vance Broemel, Esq.  
Assistant Attorney General  
Financial Division, Consumer Advocate Unit  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Vance.Broemel@ag.tn.gov](mailto:Vance.Broemel@ag.tn.gov)

Karen H. Stachowski  
Assistant Attorney General  
Financial Division, Consumer Advocate Unit  
Office of the Tennessee Attorney General  
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Nashville, TN 37202-0207  
[Karen.Stachowski@ag.tn.gov](mailto:Karen.Stachowski@ag.tn.gov)

This the 18<sup>th</sup> day of May 2021.



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Melvin J. Malone