

STATE OF TENNESSEE

Office of the Attorney General



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July 1, 2021

Dr. Kenneth C. Hill, Chair  
c/o Sharla Dillon  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

RE: ***Petition of Tennessee-American Water Company for approval of changes regarding the 2021 investment and related expenses under the qualified infrastructure investment program rider, the economic development investment rider and the safety and environmental compliance rider, TPUC Docket No. 20-00128.***

Dear Chair Hill:

Since the submission of Tennessee-American Water Company's (TAWC) Petition on November 24, 2020, in the above-referenced matter, TAWC and the Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office ("Consumer Advocate") have been involved in cooperative discussions and have exchanged various information related to the Petition. With the recent submission of the Consumer Advocate's Testimony of Alex Bradley, the parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer. TAWC will not be filing rebuttal testimony.

Moreover, after considering the entire record, including TAWC's responses to discovery, and consistent with the streamlined approach contemplated in the alternative method riders approved in TPUC Docket No. 13-00130, 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 discovery, the parties' communications, and pre-filed testimony. As reflected in the Pre-Filed Testimony of Grady Stout Adopting Pre-Filed Direct Testimony of Kurt A. Stafford; the Pre-Filed Direct Testimony of Todd P. Wright Adopting Pre-Filed Direct Testimony of Elaine K. Chambers; the Direct Testimony of Elaine K. Chambers, Grady Stout, and Kurt A. Stafford; and the Pre-Filed Testimony of Alex Bradley, there are no contested issues between the parties on the merits of the Petition. Thus, it is the position of the parties that this matter should be resolved in

favor of the positions set forth in TAWC's Petition, consistent 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 each of their opening statements, the live presentation of testimony, and cross-examination of witnesses by the Parties. TAWC Witnesses Stout and Wright and the CA Witness Bradley 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, TAWC waives cross-examination of Mr. Bradley, and the CA waives cross-examination of Mr. Stout and Mr. Wright.

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,

*Rachel C. Bowen*

Rachel C. Bowen  
Assistant Attorney General

cc: Melvin Malone, Esq.