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January 11, 2021

VIA ELECTRONIC FILING

Hon. Kenneth C. Hill, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

RE: *Petition of Tennessee-American Water Company 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*

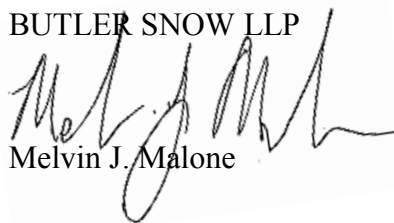
Dear Chairman Hill:

Please find attached for filing *Tennessee-American Water Company's Motion or Extension of Time to Respond to the Consumer Advocate's Motion to Terminate or Suspend Current Capital Riders Mechanism* in the above-captioned docket.

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

Attachment

cc: Elaine Chambers, TAWC
Daniel P. Whitaker III, Consumer Advocate Unit
Vance Broemel, Consumer Advocate Unit

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

**PETITION OF TENNESSEE-
AMERICAN WATER COMPANY
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**

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DOCKET NO. 20-00128

**TENNESSEE-AMERICAN WATER COMPANY’S MOTION
FOR EXTENSION OF TIME TO RESPOND TO THE CONSUMER ADVOCATE’S
MOTION TO TERMINATE OR SUSPEND
CURRENT CAPITAL RIDERS MECHANISM**

Pursuant to Rule 1220-01-02-.06 (2) 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 for Extension of Time to Respond to the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General’s Motion to Terminate or Suspend Current Capital Riders Mechanism (“*Motion*”). For good cause shown, TAWC respectfully requests that the Commission grant its request.

I. ARGUMENT

On January 6, 2021, the Consumer Advocate submitted the *Motion* in this matter requesting the Commission to either terminate or suspend TAWC’s Capital Recovery Riders. The *Motion* is lengthy and involves significant issues that may have a substantial impact upon the Company. Given the foregoing, coupled with the receipt of the *Motion* just after the holidays, TAWC has some internal scheduling and resource conflicts and also needs more time to adequately analyze

the Consumer Advocate's *Motion* in order to prepare an appropriate response. The Commission's rules grant a party opposing a motion seven (7) days to respond and expressly provides that "[t]he Commission, or Hearing Officer may shorten or extend the time for responding to any motion."¹

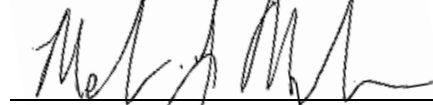
TAWC has conferred with the Consumer Advocate, and TAWC is authorized to represent that the Consumer Advocate does not oppose TAWC's request for an additional seven (7) days to submit its response to the *Motion*.

II. CONCLUSION

Tennessee-American very much appreciates the Consumer Advocate's good faith cooperation. For the foregoing reasons, Tennessee-American respectfully requests the Commission to grant it seven (7) additional days to respond to the *Motion*.

This the 11th day of January 2021.

RESPECTFULLY SUBMITTED,



MELVIN J. MALONE (BPR #013874)

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Attorneys for Tennessee-American Water Company

Dated: January 11, 2021

¹ Rule 1220-01-02-.06 (2) of the Tennessee Public Utility Commission's Rules of Practice and Procedure.

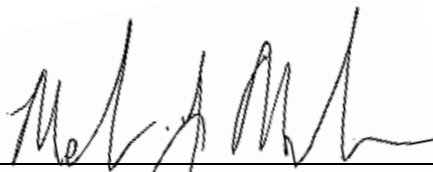
CERTIFICATE OF SERVICE

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.
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Daniel Whitaker, Esq.
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Nashville, TN 37202-0207
Daniel.Whitaker@ag.tn.gov

This the 11th day of January 2021.



Melvin J. Malone