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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, 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*

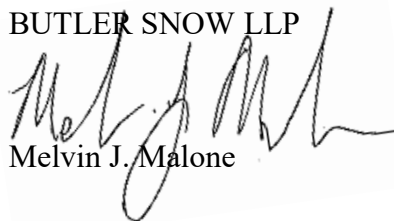
Dear Chairman Hill:

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

Attachment

cc: Todd Wright, TAWC
Rachel Bowen, 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
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
TO AMEND PROCEDURAL SCHEDULE**

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 25, 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 8, 2021. The Commission denied the CAU’s Motion to Terminate or Suspend the Current Capital Riders Mechanism on April 12, 2021.

Pursuant to the request of the Hearing Officer, on or about April 27, 2021, the parties submitted a *Joint Proposed Procedural Schedule* in this matter. On May 13, 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.

Although the petition was submitted in November of last year, it was dormant for a considerable period due to a pending motion. As the petitioner here, the Company respectfully requests that it not be penalized due to the untimely departure of an essential member of TAWC’s regulatory team. TAWC requests that the Commission permit it and the CAU to work together on a revised Joint Procedural Schedule, with an aim towards an August target hearing date.¹ In the

¹ Tennessee-American has informed the Consider Advocate Unit of both Ms. Chambers’ departure and of its need for an amended procedural schedule. While the CAU and TAWC engaged in cooperative, good faith discussions, a resolution could not be reached.

alternative, TAWC submits the proposed modified procedural schedule below for consideration by the Commission.

June 11, 2021
June 30, 2021
August 9, 2021

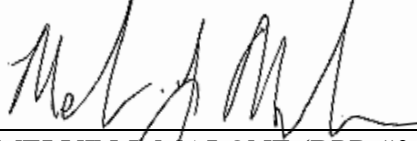
CAU Pre-Filed Testimony
TAWC's Pre-Filed Rebuttal Testimony
Target Hearing Date

III. CONCLUSION

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

This the 18th day of May 2021.

RESPECTFULLY SUBMITTED,



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Attorneys for Tennessee-American Water Company

Dated: May 18, 2021

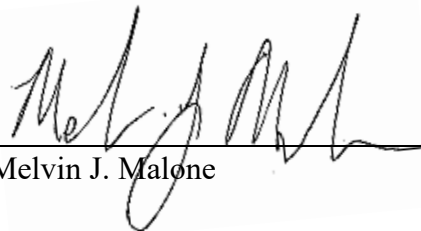
CERTIFICATE OF SERVICE

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
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Rachel.Bowen@ag.tn.gov

This the 18th day of May 2021.



Melvin J. Malone