

BUTLER | SNOW

March 26, 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 Production Costs and Other Pass-Throughs Rider*, TPUC Docket No. 21-00006

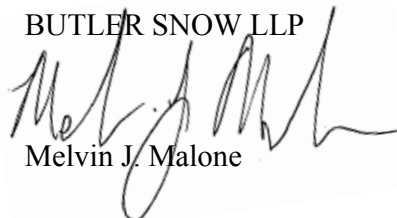
Dear Chairman Hill:

Attached for filing please find *Tennessee American Water Company's Responses to First Discovery Requests of the Consumer Advocate* in the above-captioned matter.

As required, one (1) hard copy of this filing 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: Elaine Chambers, TAWC
Karen H. Stachowski, Consumer Advocate Unit

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BUTLER SNOW LLP

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

IN RE:)	
)	
PETITION OF TENNESSEE-AMERICAN WATER COMPANY REGARDING THE 2021 PRODUCTION COSTS AND OTHER PASS-THROUGHS RIDER)	DOCKET NO. 21-00006
)	
)	

**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. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Elaine K. Chambers

Question:

- 1-1. Refer to <Workpaper_Waste Disposal – 2020.xlsx> as filed with the Company’s Petition. Specifically, refer to tab ‘Marion Environmental’, row 16. Provide the Company’s reasoning for including this charge. as the invoice date is December 23, 2020, which is outside the review period for this proceeding.

Response:

- 1-1. Invoice number 164863 includes charges for services performed and completed between November 24, 2020 and November 25, 2020, which falls within the review period for this proceeding. See TAW_R_CAPDDR1_001_031921_Attachment 1.



Marion Environmental, Inc.
115 Parmenas Lane
Chattanooga, TN 37405
423-499-4919
EIN 62-1472843

Invoice Page 1 of 2

Date	Invoice ID
11/30/2020	164863

Bill To:

AMERICAN WATER SERVICES
P.O. BOX 5614
CHERRY HILL, NJ 08034-5614

Svc Location:

WHITWELL
600 NORTH CEDAR AVE
WHITWELL, TN 37397

Project #	Svc Type	Promised Start Date	Project Name	PO #	Terms
202514	CHA-IND	2020-11-24	Basin Cleaning	3000432846	Upon Receipt

11/24 & 11/25

CLEAN BASIN

Description	Qty	Unit	Rate	Price
11/24				
Guzzler Vacuum Truck w/Operator, reg	8	hrs	168.00	1,344.00
Equipment Fuel Surcharge	920		0.12	110.40
Supervisor-reg	8	hrs	60.00	480.00
Technicians-reg	16	man hrs	50.00	800.00
1 Ton Crew Cab 4 X 4 (3500)	1	each	153.00	153.00
Hose - Hard Pipe 10ft section	1	each	25.00	25.00
Drop Tanker	1	load	350.00	350.00
Fuel Surcharge	350		0.12	42.00
Tanker Daily Rental (11/24 - 11/25)	2	days	125.00	250.00
11/25				
Guzzler Vacuum Truck w/Operator, reg	8	hrs	168.00	1,344.00
Guzzler Vacuum Truck w/Operator, ot	0.50	hrs	188.00	94.00
Equipment Fuel Surcharge	977.50		0.12	117.30
Supervisor-reg	8	hrs	60.00	480.00
Supervisor-ot	0.50	hrs	80.00	40.00
Technician-reg	8	hrs	50.00	400.00
Technician-ot	0.50	hrs	70.00	35.00

Continued on next page



Marion Environmental, Inc.
115 Parmenas Lane
Chattanooga, TN 37405
423-499-4919

Invoice Page 2 of 2

Date	Invoice ID
11/30/2020	164863

Description	Qty	Unit	Rate	Price
1 Ton Crew Cab 4 X 4 (3500)	1	each	153.00	153.00
N/H Waste Disposal , Manifest: 152795	5000	gallons	0.60	3,000.00
N/H Waste Disposal , Manifest: 152796	5000	gallons	0.60	3,000.00
N/H Waste Disposal , Manifest: 152797	5000	gallons	0.60	3,000.00
N/H Waste Disposal , Manifest: 152798	5000	gallons	0.60	3,000.00
N/H Waste Disposal , Manifest: 153469	5000	gallons	0.60	3,000.00
Transportation	5	loads	350.00	1,750.00

Total: 22,967.70

Paid: -22,967.70

Amount Due: 0.00

A service charge of 1.5% per month, annual percentage rate of 18%, will be assessed on all past due amounts plus attorney's fees and costs of collection.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Elaine K. Chambers

Question:

- 1-2. Refer to <Workpaper_Purchased Water – 2020.xlsx> as filed with the Company’s Petition. Specifically, refer to tab ‘Eastside Utility District’, row 21. Provide a narrative response detailing the approximate 108% increase in purchased water expense for this period as compared to the prior period.

Response:

- 1-2 The vendor, Eastside Utility District, estimated the amount of usage for the service periods of July, August, and September 2020 due to a commercial account meter that had malfunctioned. Once this meter issue was addressed, additional consumption amounts resulted in a 108% increase in purchased water expense as reflected on the October 2020 invoice.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Elaine K. Chambers

Question:

- 1-3. Refer to <Workpaper_Usage – 2020.xlsx> as filed with the Company’s Petition. Specifically, refer to the system delivery and water sales data for September 2020. The Consumer Advocate notes that the Non-Revenue Water (NRW) for this month was \$94,235, which was \$182,010 less than the 12-month average for the year. Confirm that the data for September 2020 are accurate. If they are correct, provide a narrative explanation detailing the reason for this decrease in NRW.

Response:

- 1-3. The water sales and non-revenue water data for September 2020 is accurate. The increase in water sales was due to a cancel/rebill correction for Koch Foods because of meter issue. Bills from April 2020 thru August 2020 were cancelled in August 2020 for total (10,078)K Gals, but rebills did not take place until September 2020 for total 14,346K Gals for the billing period from April 2020 thru September 2020.

Please see the attachment TAW_R_CAPDDR1_003_031921_Attachment for a normalized monthly view.

Link Out to:

TAW_EXH_EKC_1_011521.xlsx

	12/1/2019	1/1/2020	2/1/2020	3/1/2020	4/1/2020	5/1/2020	6/1/2020	7/1/2020	8/1/2020	9/1/2020	10/1/2020	11/1/2020	Total
System Delivery	1,011,089.00	1,007,335.00	949,930.00	963,793.00	904,981.00	1,002,396.00	1,035,024.00	1,212,378.00	1,111,166.00	1,042,288.00	1,005,430.00	918,333.00	12,164,143.00
Water Sales	652,165.00	757,960.50	647,302.20	709,012.37	653,085.96	673,363.30	747,078.63	881,764.88	698,470.74	948,053.18	737,931.17	743,018.96	8,849,206.89
Non Revenue Water	358,924.00	249,374.50	302,627.80	254,780.63	251,895.05	329,032.70	287,945.37	330,613.12	412,695.26	94,234.82	267,498.84	175,314.04	3,314,936.11
Water Sales ex Koch Food Cancel/Rebill Aug & Sep	652,165.00	757,960.50	647,302.20	709,012.37	653,085.96	673,363.30	747,078.63	881,764.88	799,246.53	804,592.02	737,931.17	743,018.96	8,806,521.52
Cancel/Rebill for Kock Foods - 2020.08					(11,044)	(24,453)	(33,235)	(35,667)	3,623				(100,776)
Cancel/Rebill for Kock Foods - 2020.09			-	-	-	33,065	22,710	26,102	28,851	32,732			143,461
Net Cancel/Rebill					(11,044)	8,612	(10,525)	(9,565)	32,474	32,732			42,685
Adjusted Water Sales Reflected Cancal/Rebill	652,165.00	757,960.50	647,302.20	709,012.37	642,041.74	681,975.77	736,553.52	872,200.21	831,720.95	837,324.50	737,931.17	743,018.96	8,849,206.89
Adjusted Non Revenue Water	358,924.00	249,374.50	302,627.80	254,780.63	262,939.27	320,420.23	298,470.48	340,177.79	279,445.05	204,963.50	267,498.84	175,314.04	3,314,936.11

AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948216	03/19/2020	04/17/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003857741	03/19/2020	04/17/2020	08/22/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	670005487958	04/18/2020	05/18/2020	08/20/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948200	04/18/2020	05/18/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948217	04/18/2020	05/18/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948200	04/18/2020	05/18/2020	08/22/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003890575	05/19/2020	06/16/2020	08/20/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948201	05/19/2020	06/16/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948219	05/19/2020	06/16/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948201	05/19/2020	06/16/2020	08/22/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003921482	06/17/2020	07/17/2020	08/20/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948202	06/17/2020	07/17/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948221	06/17/2020	07/17/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948202	06/17/2020	07/17/2020	08/22/2020
AWTR/40131000	Ind Sales Billed	210016934806	Koch Foods LLC	613756303227	07/18/2020	08/18/2020	08/19/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948203	07/18/2020	08/18/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948222	07/18/2020	08/18/2020	08/21/2020
AWTR/40131000	Ind Sales Billed	210016154426	Koch Foods LLC	100003948203	07/18/2020	08/18/2020	08/22/2020

Billed Contracts	Billed Usage (1000G)	Revenue	Average Revenue/1000G
	* 1,000	\$	
1	(27,459.08)	(43,635.46)	1.59
1	27,459.08	43,635.46	1.59
1	0.00	0.00	X
1	(27,459.08)	(43,635.46)	1.59
1	27,459.08	43,635.46	1.59
1	(26,920.52)	(43,067.65)	1.60
1	26,920.52	43,067.65	1.60
1	0.00	0.00	X
1	(26,920.52)	(43,067.65)	1.60
1	26,920.52	43,067.65	1.60
1	(14,391.52)	(29,858.33)	2.07
1	14,391.52	29,858.33	2.07
1	0.00	0.00	X
1	(14,391.52)	(29,858.33)	2.07
1	14,391.52	29,858.33	2.07
1	(2,022.59)	(9,288.10)	4.59
1	115,485.96	136,442.20	1.18
1	0.00	0.00	X
1	(115,485.96)	(136,442.20)	1.18
1	35,087.93	51,678.56	1.47
1	(2,022.59)	(9,288.11)	4.59
1	2,022.59	9,288.11	4.59
1	0.00	0.00	X
1	(2,022.59)	(9,288.11)	4.59
1	24,732.62	40,760.95	1.65
1	(2,022.59)	(9,288.11)	4.59
1	2,022.59	9,288.11	4.59
1	0.00	0.00	X
1	(2,022.59)	(9,288.11)	4.59
1	28,124.80	44,337.32	1.58
1	(2,022.59)	(9,288.10)	4.59
1	2,022.59	9,288.10	4.59
1	0.00	0.00	X
1	(2,022.59)	(9,288.10)	4.59
1	30,873.70	47,235.49	1.53
1	1,309.00	3,809.58	2.91
1	31,423.48	47,815.12	1.52
2	143,461.16	198,484.60	1.38

Billed Contracts	Billed Usage (1000G)	Revenue	Average Revenue/1000G
	* 1,000	\$	
1	27,459.08	43,635.46	1.59
1	(27,459.08)	(43,635.46)	1.59
1	26,920.52	43,067.65	1.60
1	(26,920.52)	(43,067.65)	1.60

1	14,391.52	29,858.33	2.07
1	(25,435.74)	(41,502.25)	1.63
1	(26,475.46)	(42,598.43)	1.61
1	13,561.99	28,983.75	2.14
1	2,022.59	9,288.10	4.59
1	(13,561.99)	(28,983.75)	2.14
1	(35,257.73)	(51,857.57)	1.47
1	18,579.57	34,273.79	1.84
1	2,022.59	9,288.11	4.59
1	(18,579.57)	(34,273.79)	1.84
1	(37,689.48)	(54,421.37)	1.44
1	19,795.07	35,555.28	1.80
1	2,022.59	9,288.11	4.59
1	(19,795.07)	(35,555.28)	1.80
1	1,600.72	4,486.32	2.80
1	691,808.00	744,058.52	1.08
1	2,022.59	9,288.10	4.59
1	(691,808.00)	(744,058.52)	1.08
2	(100,775.80)	(118,882.55)	1.18

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Elaine K. Chambers

Question:

1-4. Provide the base rate revenues for the year ending 2020 in the following format:

Line No.		2020 Revenues
1	Residential	
2	Commercial	
3	Industrial	
4	Other Public Authority	
5	Other Water Utility	
	Special Contract	
6	Fort Oglethorpe	
7	Catoosa County	
8	Signal Mountain	
9	Walden's Ridge	
10	Private Fire Service	
11	Total Water Sales Revenues	
12	Other Revenues	
13	Total Revenues	

Response:

1-4. Please refer to the attachment, TAW_R_CAPDDR1_004_031921_Attachment.

Line No No.		2020 Revenues
1	Residential	\$21,231,674
2	Commercial	14,814,367
3	Industrial	3,710,392
4	Other Public Utility	2,979,268
5	Other Water Utility	4,745
	Special Contract	
6	Fort Oglethorpe	432,402
7	Catoosa County	178,061
8	Signal Mountain	417,630
9	Walden's Ridge	0
10	Private Fire Service	2,534,759
11	Total Water Sales Revenues	46,303,298
12	Other Revenues	0
13	Total Revenues	\$46,303,298

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Elaine K. Chambers

Question:

- 1-5. Refer to tab 'Link In' in <TAW_EXH_EKC_1_011521.xlsx>. Specifically, refer to rows 28 and 30 that refer to the authorized sales and revenues from the Company's last general rate case, TPUC Docket No. 12-00049. Provide answers to the following questions regarding these values:
- a. Confirm that the decision in TPUC Docket No. 12-00049 included Walden's Ridge volumes and revenues;
 - b. Confirm that Walden's Ridge no longer receives service from the Company; and
 - c. Provide the projected revenues and volumes for Walden's Ridge from the TPUC Docket No. 12-00049 rate case.

Response:

- 1-5. Please refer to the responses below:
- a. Yes. Docket No. 12-00049 included Walden's Ridge volumes and revenues.
 - b. Yes. Walden's Ridge no longer receives service from TAWC. The company sold the assets constructed and/or acquired to serve Walden's Ridge Utility District in April 2015.
 - c. Docket No. 12-00049 included \$545,062 of annual revenues from volumes of 454,854 CCF or 3,402,615 100 gallons for Walden's Ridge.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Elaine K. Chambers

Question:

- 1-6. Provide the known number of bills, billing determinates, and revenues for the Jasper Highlands service territory since the Company's acquisition of the system in the following format (attached as Attachment A to this Discovery Request):

Area: Jasper Highlands														
Customer Class: Residential		Determinants												
Meter Size	Rate	January	February	March	April	May	June	July	August	September	October	November	December	Total
All														
Total		-	-	-	-	-	-	-	-	-	-	-	-	-
Volumetric Block (cost per 100 gallons)														
First 2,500 Gallons	\$ 52.15													
Next 2,500 Gallons	1.31													
Next 2,500 Gallons	1.17													
Above 7,500 Gallons	1.04													
Total		-	-	-	-	-	-	-	-	-	-	-	-	-
Area: Jasper Highlands														
Customer Class: Residential		Water Revenues												
Meter Size	Rate	January	February	March	April	May	June	July	August	September	October	November	December	Total
All														
Total		-	-	-	-	-	-	-	-	-	-	-	-	-
Volumetric Block (cost per 100 gallons)														
First 2,500 Gallons	\$ 52.15													
Next 2,500 Gallons	1.31													
Next 2,500 Gallons	1.17													
Above 7,500 Gallons	1.04													
Total		-	-	-	-	-	-	-	-	-	-	-	-	-

Response:

- 1-6. Feb 2021 was the first month TAW started to bill customers. Please refer to the attachment, TAW_R_CAPDDR1_006_031921_Attachment.

TPUC Docket No. 21-00006
TAW_R_CAPDDR1_006_031921 Attachment

Area: Jasper Highlands

Customer Class: Residential

Determinants 2021

[illegible]

Volumetric Block (cost per 100 gallons)

[illegible]

Area: Jasper Highlands

Customer Class: Residential

Water Revenues 2021

[illegible]

Volumetric Block (cost per 100 gallons)

[illegible][illegible]

TPUC Docket No. 21-00006
TAW_R_CAPDDR1_006_031921 Attachment

Area: Jasper Highlands

Customer Class: Commercial

Determinants

2021

[illegible]

Volumetric Block (cost per 100 gallons)

[illegible]

Area: Jasper Highlands

Customer Class: Commercial

Water Revenues

2021

[illegible]

Volumetric Block (cost per 100 gallons)

[illegible][illegible]

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00006
FIRST DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT

Responsible Witness: Elaine K. Chambers

Question:

- 1-7. Provide the 2021 estimated number of bills, billing determinates, and revenues for the Jasper Highlands service territory in the following format (attached as Attachment A to this Discovery Request):

Area: Jasper Highlands															
Customer Class: Residential		Determinants													
Meter Size	Rate	January	February	March	April	May	June	July	August	September	October	November	December	Total	
All															
Total		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Volumetric Block (cost per 100 gallons)															
First 2,500 Gallons	\$ 52.15														
Next 2,500 Gallons	1.31														
Next 2,500 Gallons	1.17														
Above 7,500 Gallons	1.04														
Total		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Area: Jasper Highlands															
Customer Class: Residential		Water Revenues													
Meter Size	Rate	January	February	March	April	May	June	July	August	September	October	November	December	Total	
All															
Total		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Volumetric Block (cost per 100 gallons)															
First 2,500 Gallons	\$ 52.15														
Next 2,500 Gallons	1.31														
Next 2,500 Gallons	1.17														
Above 7,500 Gallons	1.04														
Total		-	-	-	-	-	-	-	-	-	-	-	-	-	-

Response:

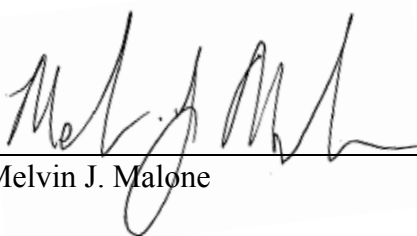
- 1-7. Please refer to the response to discovery request 1-4 in the acquisition docket number 20-00011 for estimates regarding Jasper Highlands. The company has currently only experienced one month of billing data provided in discovery request 1-6 of this docket.

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:

Karen H. Stachowski
Assistant Attorney General
Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Unit
P.O. Box 20207
Nashville, Tennessee 37202-0207
karen.stachowski@ag.tn.gov

This the 26th day of March, 2021.



Melvin J. Malone