

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF TENNESSEE-
AMERICAN WATER COMPANY
REGARDING THE 2021 PRODUCTION
COSTS AND OTHER PASS-
THROUGHS RIDER**

DOCKET NO. 21-00006

**CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST
TO TENNESSEE AMERICAN WATER COMPANY.**

To: Tennessee American Water Company
C/O Melvin J. Malone
Butler, Snow, O'Mara, Stevens & Cannada, PLLC
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
melvin.malone@butlersnow.com

Elaine K. Chambers
Director of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502
Elaine.K.Chambers@amwater.com

This Second Discovery Request is hereby served upon Tennessee American Water Company ("Company"), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General ("Consumer Advocate") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, John Sevier Building, 500 Dr. Martin L. King Jr.

Blvd., Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 2:00 p.m. (central), April 12, 2021.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Discovery Request to Tennessee American Water* sent to the Company on March 5, 2021¹, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

- 2-1. Refer to the Company's response to DR No. 1-4. Next, refer to the provided excel spreadsheet (values sourced from <Workpaper_Billing Determinants - 2020.xlsx>). Reconcile the difference in revenues between these two files.

RESPONSE:

- 2-2. Confirm that the Company's Jasper Highlands service territory uses water sourced from a third-party provider and not TAWC's own treatment systems.

RESPONSE:

¹ On March 26, 2021, the Company filed with TPUC its response to the *Consumer Advocate's First Discovery Request to Tennessee American Water*.

RESPECTFULLY SUBMITTED,

Karen H. Stachowski

KAREN H. STACHOWSKI (BPR No. 019607)

Assistant Attorney General

Office of the Tennessee Attorney General

Financial Division, Consumer Advocate Unit

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2370

Fax: (615) 532-2910

Email: karen.stachowski@ag.tn.gov

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:

Melvin J. Malone
Butler Snow LLP
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
melvin.malone@butlersnow.com

Elaine K. Chambers
Director of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502
Elaine.K.Chambers@amwater.com

This the 5th day of April, 2021.

Karen H Stachowski
KAREN H. STACHOWSKI

Line No.	Service Territory	Residential Revenues	Commercial Revenues	Industrial Revenues	OPA Revenues	Sale for Resale Revenues	Private Fire Service Revenues	
1	Chattanooga	\$ 17,947,196	\$ 14,466,392	\$ 3,538,259	\$ 2,910,917	\$ 578,665	\$ 2,575,018	\$ 42,016,447 A/
2	Lookout Mtn.	1,153,677	173,364		63,828			\$ 1,390,869 B/
3	Lakeview	858,096	102,485		12,475			\$ 973,056 C/
4	Suck Creek	126,372	2,669					\$ 129,041 D/
5	Whitwell	1,853,456	76,319		22,388			\$ 1,952,162 E/
6	Jasper Highlands							\$ -
7	Fort Oglethorpe					430,830		\$ 430,830 F/
8	Catoosa County							\$ -
9	Signal Mountain							\$ -
10	Total	\$ 21,938,796	\$ 14,821,228	\$ 3,538,259	\$ 3,009,608	\$ 1,009,495	\$ 2,575,018	\$ 46,892,404
11	Per DR 1-4	21,231,674	14,814,367	3,710,392	2,984,013	1,028,093	2,534,759	46,303,298 G/
12	Difference	707,122	6,861	(172,133)	25,595	(18,598)	40,259	589,106

A/ Docket 21-00006, Workpaper_Billing Determinants - 2020.xlsx, Tab Chattanooga
 B/ Docket 21-00006, Workpaper_Billing Determinants - 2020.xlsx, Tab Lookout Mt.
 C/ Docket 21-00006, Workpaper_Billing Determinants - 2020.xlsx, Tab Lakeview
 D/ Docket 21-00006, Workpaper_Billing Determinants - 2020.xlsx, Tab Suck Creek
 E/ Docket 21-00006, Workpaper_Billing Determinants - 2020.xlsx, Tab Whitwell
 F/ Docket 21-00006, Workpaper_Billing Determinants - 2020.xlsx, Tab Ft. Oglethorpe
 G/ Docket 21-00006, DR 1-4, TAW_R_CAPDDR1_004_031921_Attachment