

BUTLER | SNOW

April 7, 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

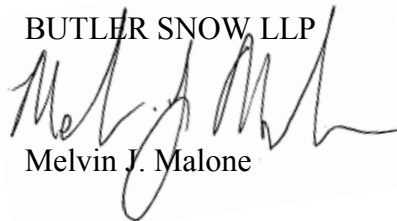
Dear Chairman Hill:

Attached for filing please find *Tennessee American Water Company's Supplemental Response 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)	DOCKET NO. 21-00006
WATER COMPANY REGARDING THE)	
2021 PRODUCTION COSTS AND)	
OTHER PASS-THROUGHS RIDER)	

**TENNESSEE-AMERICAN WATER COMPANY’S SUPPLEMENTAL RESPONSE
TO FIRST DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Supplemental Response 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:

- 1-3. 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.

Supplemental 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 Revised 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	966,763.00	912,804.00	1,015,744.00	1,053,726.00	1,237,278.00	1,141,376.00	1,076,397.00	1,044,946.00	960,891.00	12,378,279.00	Updated for system delivery correction
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	257,750.63	259,718.05	342,380.70	306,647.37	355,513.12	442,905.26	128,343.82	307,014.83	217,872.04	3,529,072.11	
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	257,750.63	270,762.27	333,768.23	317,172.48	365,077.79	309,655.05	239,072.51	307,014.83	217,872.04	3,529,072.11	

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

STATE OF KENTUCKY)
COUNTY OF FAYETTE)


BEFORE ME, the undersigned, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Elaine Chambers, being by me first duly sworn deposed and said that:

She is appearing as a witness on behalf of Tennessee-American Water Company before the Tennessee Public Utility Commission, and duly sworn, verifies that the data requests and discovery responses are accurate to the best of her knowledge.



Elaine Chambers

Sworn to and subscribed before me
this 6TH day of APRIL, 2021.



Notary Public

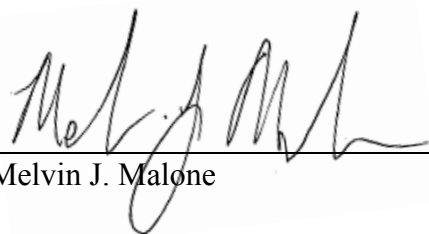
My Commission expires: JULY 31, 2021
Notary ID 584022

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 7th day of April, 2021.



Melvin J. Malone