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April 12, 2021

**VIA ELECTRONIC FILING**

Hon. Kenneth C. Hill, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto: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 Second 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

*The Pinnacle at Symphony Place  
150 3<sup>rd</sup> Avenue South, Suite 1600  
Nashville, TN 37201*

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BUTLER SNOW LLP

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

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

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**TENNESSEE-AMERICAN WATER COMPANY’S RESPONSES  
TO SECOND DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

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Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Responses to the Second 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  
SECOND DISCOVERY REQUEST OF THE  
CONSUMER ADVOCATE UNIT**

**Responsible Witness:**

**Question:**

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:**

2-1. The schedule that compares the DR No. 1-4 and Workpaper-Billing Determinants – 2020.xlsx had 2 issues: First, the filed version of Workpaper-Billing Determinants –2020.xlsx contains 12 months from December 2019 and November 2020 to be consistent with the PCOP review period. The response to discovery request no. 1-4 contains 12 months ended 12/31/2020 invoiced amounts as requested. Second, the attachment provided for this discovery request, DR 2 Attachment 1, contained an error incorrectly including fixed charges twice for residential, commercial and OPA for the Whitwell service area.

After taking into account the issues mentioned above, the variance really was \$981. The variance was mainly driven by a one-time bill adjustment on industrial customer Pilgrim's Pride made in October 2020 for \$179,940 as well as other miscellaneous manual adjustments to other customer classes.

Please refer to the attachment file, TAW\_R\_CAPPDDR2\_001\_041221\_ Attachment.

**Original View**

12/1/2019 - 11/30/2020

Line No.	Service Territory	Residential Revenues	Commercial Revenues	Industrial Revenues	OPA Revenues	Sale for Resale Revenues	
1	Chattanooga	\$ 17,947,196	\$ 14,466,392	\$ 3,538,259	\$ 2,910,917	\$ 578,665	\$
2	Lookout Mtn.	1,153,677	173,364		63,828		
3	Lakeview	858,096	102,485		12,475		
4	Suck Creek	126,372	2,669				
5	Whitwell	1,853,456	76,319		22,388		
6	Jasper Highlands						
7	Fort Oglethorpe					430,830	
8	Catoosa County						
9	Signal Mountain						
10	<b>Total</b>	<b>\$ 21,938,796</b>	<b>\$ 14,821,228</b>	<b>\$ 3,538,259</b>	<b>\$ 3,009,608</b>	<b>\$ 1,009,495</b>	<b>\$</b>
11	Per DR 1-4	21,231,674	14,814,367	3,710,392	2,984,013	1,028,093	
12	<b>Difference</b>	<b>707,122</b>	<b>6,861</b>	<b>(172,133)</b>	<b>25,595</b>	<b>(18,598)</b>	

A/ Docket 21-00006, Workpaper\_Billing Determinants - 2020.xlsx, Tab Chattanooga - 12/2019 - 11/2020

B/ Docket 21-00006, Workpaper\_Billing Determinants - 2020.xlsx, Tab Lookout Mt. - 12/2019 - 11/2020

C/ Docket 21-00006, Workpaper\_Billing Determinants - 2020.xlsx, Tab Lakeview - 12/2019 - 11/2020

D/ Docket 21-00006, Workpaper\_Billing Determinants - 2020.xlsx, Tab Suck Creek - 12/2019 - 11/2020

E/ Docket 21-00006, Workpaper\_Billing Determinants - 2020.xlsx, Tab Whitwell - 12/2019 - 11/2020

F/ Docket 21-00006, Workpaper\_Billing Determinants - 2020.xlsx, Tab Ft. Oglethorpe - 12/2019 - 11/2020

G/ Docket 21-00006, DR 1-4, TAW\_R\_CAPDDR1\_004\_031921\_Attachment for fiscal year 2020.

**Updated View**

1/1/2020 - 12/31/2020

<u>Private Fire Service Revenues</u>			<u>Line No.</u>	<u>Service Territory</u>	<u>Residential Revenues</u>	<u>Commercial Revenues</u>
2,575,018	\$	42,016,447 A/	1	Chattanooga	\$ 18,040,419	14,494,889
	\$	1,390,869 B/	2	Lookout Mtn.	1,155,243	172,900
	\$	973,056 C/	3	Lakeview	857,540	102,229
	\$	129,041 D/	4	Suck Creek	126,498	2,706
	\$	1,952,162 E/	5	Whitwell	1,126,553	75,427
	\$	-	6	Jasper Highlands		
	\$	430,830 F/	7	Fort Oglethorpe		
	\$	-	8	Catoosa County		
	\$	-	9	Signal Mountain		
2,575,018	\$	46,892,404	10	<b>Total</b>	<b>21,306,252</b>	<b>\$ 14,848,151</b>
2,534,759		46,303,298 G/	11	Per DR 1-4	\$ 21,231,674	14,814,367
40,259		589,106	12	<b>Difference</b>	<b>74,578</b>	<b>33,783</b>

<u>Industrial Revenues</u>	<u>OPA Revenues</u>	<u>Sale for Resale Revenues</u>	<u>Private Fire Service Revenues</u>		
3,531,003	2,903,306	600,435	2,581,780	\$	<b>42,151,833</b>
	64,357			\$	<b>1,392,500</b>
	12,329			\$	<b>972,098</b>
				\$	<b>129,204</b>
	22,301			\$	<b>1,224,281</b>
				\$	-
		432,402		\$	<b>432,402</b>
				\$	-
				\$	-
<b>\$ 3,531,003</b>	<b>\$ 3,002,294</b>	<b>\$ 1,032,837</b>	<b>\$ 2,581,780</b>	<b>\$</b>	<b>46,302,317</b>
					-
3,710,392	2,984,013	1,028,093	2,534,759		46,303,298
					-
<b>(179,388)</b>	<b>18,281</b>	<b>4,744</b>	<b>47,021</b>		<b>(981)</b>

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

**Responsible Witness:**

**Question:**

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:**

2-2. The Company purchases water from the South Pittsburg municipal provider for the Jasper Highland's service territory. The purchase of Jasper Highlands system occurred after the test period ended, November 2020, for this Docket No. 20-00006.



**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.



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Elaine Chambers

Sworn to and subscribed before me  
This 12<sup>TH</sup> day of APRIL, 2021.

  
\_\_\_\_\_  
Notary Public

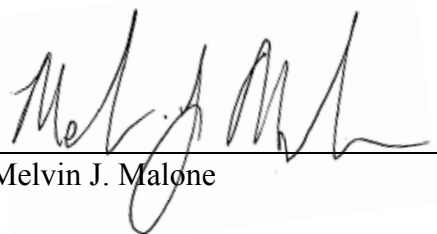
My Commission expires: 07/31/25  
Commission ID # 584022

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](mailto:karen.stachowski@ag.tn.gov)

This the 12<sup>th</sup> day of April, 2021.



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Melvin J. Malone