

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

IN RE:

**PETITION OF TENNESSEE-AMERICAN
WATER COMPANY REGARDING
CHANGES TO THE QUALIFIED
INFRASTRUCTURE INVESTMENT
PROGRAM RIDER, THE ECONOMIC
DEVELOPMENT INVESTMENT RIDER,
AND THE SAFETY AND
ENVIRONMENTAL COMPLIANCE RIDER
AND IN SUPPORT OF THE CALCULATION
OF THE 2021 CAPITAL RECOVERY
RIDERS RECONCILIATION**

Docket No. 21-00030

**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 (TAWC or "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 Rachel C. Bowen on or before Wednesday, May 19, at 2:00 p.m. CST.

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 April 14, 2021, 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. Regarding the response to Consumer Advocate DR No. 1-7, provide a list of service territories contained within each identified profit center.

RESPONSE:

- 2-2. Provide a comprehensive discussion explaining the transactions and/or accounting given rise to negative revenue recorded to account 40145200, rate number TNNRFSEC, for the months of February, March, May, June, August, September, November and December.

RESPONSE:

[Intentionally blank – signature page follows]

RESPECTFULLY SUBMITTED,

Rachel C. Bowen

RACHEL C. BOWEN (*Pro Hac Vice*)

Practice Pending Admission

Counsel for the Consumer Advocate Unit

VANCE L. BROEMEL (BPR No. 011421)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Financial Division, Consumer Advocate Unit

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TPUC Docket No. 21-00030,

Consumer Advocate's Second Discovery Requests

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 May 2021.

Rachel C. Bowen

RACHEL C. BOWEN

Counsel for the Consumer Advocate Unit