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May 18, 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 in Support of the Calculation of the 2021 Capital Recovery Riders Reconciliation, Docket No. 21-00030*

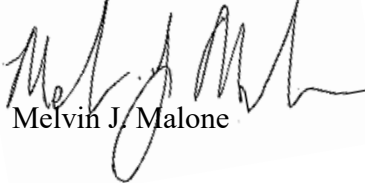
Dear Chairman Hill:

Attached for filing please find *Tennessee-American Water Company's Motion to Amend Procedural Schedule* in the above-captioned matter.

As required, one (1) hard copy 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: Todd Wright, TAWC

Rachel Bowen, Consumer Advocate Unit

Vance Broemel, Consumer Advocate Unit

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

MELVIN J. MALONE
615.651.6705
melvin.malone@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

BUTLER SNOW LLP

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

PETITION OF TENNESSEE-)	
AMERICAN WATER COMPANY IN)	
SUPPORT OF THE CALCULATION OF)	DOCKET NO. 21-00030
THE 2021 CAPITAL RECOVERY)	
RIDERS RECONCILIATION)	

**TENNESSEE-AMERICAN WATER COMPANY’S MOTION
TO AMEND PROCEDURAL SCHEDULE**

Pursuant to Rules 1220-01-02-.06 (1) and 1220-01-02-.07 of the Tennessee Public Utility Commission’s Rules of Practice and Procedure, Tennessee-American Water Company (“Tennessee-American,” “TAWC” or the “Company”) respectfully submits this Motion to Amend Procedural Schedule in the above-captioned matter. For good cause shown, TAWC respectfully requests that the Commission grant its request.

I. BACKGROUND

On March 1, 2021, Tennessee-American submitted its petition in this matter, along with supporting documentation, including the Pre-filed Direct Testimony of TAWC Witness Elaine K. Chambers. The Commission granted the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General’s (“Consumer Advocate” or “CAU”) petition to intervene on April 16, 2021.

Pursuant to the request of the Hearing Officer, on or about April 7, 2021, the parties submitted a *Joint Proposed Procedural Schedule* in this matter. On May 6, 2021, the Hearing Officer issued the *Order Establishing Procedural Schedule*.

II. ARGUMENTS

Since joining American Water Works Service Company (“AWW”) as Director, Rates and Regulatory for TAWC and Kentucky-American Water, Elaine Chambers has served as the lead Company witness in matters before the Commission, including its Capital Recovery Riders dockets. Unfortunately, Ms. Chambers voluntarily departed her position at AWW effective May 7, 2021. Under these unanticipated circumstances, Tennessee-American is hereby requesting that the current Procedural Schedule be amended to permit sufficient time for the Company to identify a substitute witness for Ms. Chambers. While the Company is acting expeditiously, it will nonetheless require some additional time for Ms. Chambers’ replacement to sufficiently review and absorb the petition, supporting documentation and other related materials, as well as handle all the other duties and responsibilities associated with this position.

As the petitioner in this case, the Company respectfully requests that the Procedural Schedule be amended due to the untimely departure of an essential member of TAWC’s regulatory team. TAWC requests that the Commission permit it and the CAU to work together on a revised Joint Procedural Schedule, with an aim towards an August target hearing date.¹ In the alternative, TAWC submits the proposed modified procedural schedule below for consideration by the Commission.

June 18, 2021
July 13, 2021
August 9, 2021

CAU Pre-Filed Testimony
TAWC’s Pre-Filed Rebuttal Testimony
Target Hearing Date

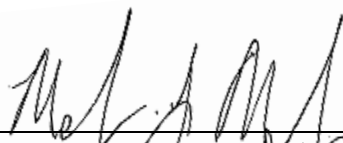
¹ Tennessee-American has informed the Consider Advocate Unit of both Ms. Chambers’ departure and of its need for an amended procedural schedule. While the CAU and TAWC engaged in cooperative, good faith discussions, a resolution could not be reached.

III. CONCLUSION

For the foregoing reasons, Tennessee-American respectfully requests the Commission to grant its Motion to Amend Procedural Schedule.

This the 18th day of May 2021.

RESPECTFULLY SUBMITTED,



MELVIN J. MALONE (BPR #013874)

Butler Snow LLP

150 3rd Avenue South, Suite 1600

Nashville, TN 37201

melvin.malone@butlersnow.com

(615) 651-6705

Attorneys for Tennessee-American Water Company

Dated: May 18, 2021

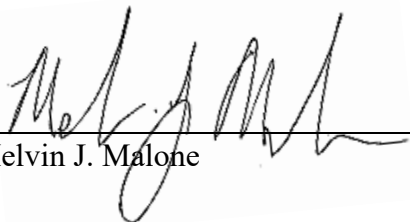
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Vance Broemel, Esq.
Assistant Attorney General
Financial Division, Consumer Advocate Unit
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202-0207
Vance.Broemel@ag.tn.gov

Rachel C. Bowen, Counsel
Financial Division, Consumer Advocate Unit
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202-0207
Rachel.Bowen@ag.tn.gov

This the 18th day of May 2021.



Melvin J. Malone