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May 19, 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*, TPUC Docket No. 21-00030

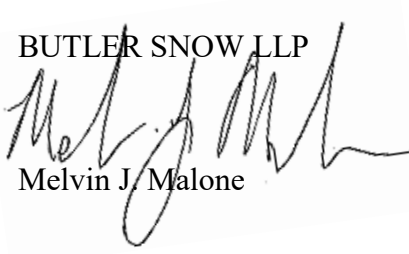
Dear Chairman Hill:

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: Todd Wright, TAWC
Rachel Bowen, Consumer Advocate Unit
Vance Broemel, Consumer Advocate Unit

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BUTLER SNOW LLP

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

**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

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

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. 21-00030
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Todd P. Wright

Question:

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:

Profit Center	Locations
2602 Chattanooga	Chattanooga Catoosa County Lookout Mountain Lakeview Ft. Oglethorpe Signal Mountain
2603 Suck Creek	Suck Creek
2605 Whitwell	Whitwell

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 21-00030
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE UNIT**

Responsible Witness: Todd P. Wright

Question:

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:

Account 40145200 as well as account 24199700 contains surcharge revenues billed to private fire customers. Private fire customers are billed quarterly in advance. When a private fire customer's service is terminated, the amount billed in advance is then prorated based on the date and the amount of days the customer's service was active. The proration of service days will lead to a billing credit to adjust the bill for the inactive period during the quarter which has been billed in advance.

In reviewing the customer credits being given to the departing private fire customers that terminated service, it was discovered that the company's billing system has been crediting the entire amount of the surcharge revenues originally billed to each such departing/terminating customer.

Attached, please find attachment file, TAW_R_CAPDDR2_002_051921_Attachment. This attachment contains the current quantification of credits given that were in excess of the amount the company owed to past private fire customers, for the period from November 2017 to December 2020 by surcharge. The company has archived billing data from its source system prior to November 2017 and is actively seeking the additional data to complete the analysis. When available, the company will update the attachment with the additional data.

Tennessee-American Water Company
Private Fire Credits Given in Excess Based on Service Termination
From November 2017 through December 2020

Docket No. 21-00030

Year	Month	EDI	QIIP	SEC	PCOP	Year Total
2017	Nov	(\$459.16)	(\$3,396.86)	(\$1,755.79)	\$1,991.21	(\$4,420.67)
	Dec	(52.83)	(582.27)	(372.11)	207.14	
2018	Jan	(183.33)	(2,254.66)	(1,417.53)	697.23	(24,421.96)
	Feb	(46.55)	(578.98)	(361.07)	178.99	
	Mar	(112.22)	(1,512.71)	(950.20)	417.23	
	Apr	(71.83)	(956.18)	(622.15)	267.36	
	May	(47.00)	(631.59)	(410.85)	175.64	
	Jun	(38.72)	(589.00)	(395.60)	133.16	
	Jul	(151.42)	(2,181.73)	(1,444.09)	543.26	
	Aug	(106.30)	(1,554.80)	(1,039.00)	383.03	
	Sep	(48.03)	(647.34)	(423.20)	178.68	
	Oct	(112.46)	(1,756.60)	(1,179.95)	395.29	
	Nov	(194.91)	(3,025.08)	(2,013.34)	687.80	
	Dec	(60.01)	(945.65)	(626.58)	211.03	
2019	Jan	(73.52)	(1,162.76)	(764.60)	258.95	(46,615.55)
	Feb	(155.03)	(2,601.48)	(1,712.32)	520.80	
	Mar	(137.51)	(2,310.26)	(1,514.04)	470.56	
	Apr	(346.32)	(5,750.46)	(3,734.58)	1,202.02	
	May	(66.55)	(983.21)	(623.77)	250.74	
	Jun	(155.69)	(2,383.16)	(1,498.90)	568.57	
	Jul	(186.77)	(3,570.96)	(2,303.33)	600.39	
	Aug	(201.49)	(3,621.76)	(2,319.52)	685.61	
	Sep	(28.38)	(578.27)	(375.30)	88.90	
	Oct	(74.41)	(1,307.44)	(813.19)	261.32	
	Nov	(177.55)	(3,293.21)	(2,111.09)	591.40	
	Dec	(179.77)	(3,408.51)	(2,185.13)	595.43	
2020	Jan	(233.80)	(4,315.80)	(2,733.94)	752.27	(80,572.87)
	Feb	(41.94)	(765.98)	(483.60)	134.46	
	Mar	(177.80)	(3,240.48)	(2,047.10)	576.14	
	Apr	(262.39)	(4,732.66)	(2,985.45)	817.51	
	May	(68.25)	(1,265.00)	(809.24)	183.88	
	Jun	(97.82)	(1,717.73)	(1,083.79)	278.85	
	Jul	(135.85)	(2,357.68)	(1,486.95)	345.20	
	Aug	(93.46)	(1,622.93)	(1,023.75)	256.35	
	Sep	(156.83)	(2,692.24)	(1,679.20)	427.70	
	Oct	(194.96)	(3,595.33)	(2,275.43)	477.83	
	Nov	(685.25)	(12,071.78)	(7,581.20)	1,808.17	
	Dec	(809.51)	(14,276.79)	(8,974.97)	2,145.65	
Total		(\$6,425.62)	(\$104,239.33)	(\$66,131.85)	\$20,765.75	(\$156,031.05)
						\$0.00

CERTIFICATE OF SERVICE

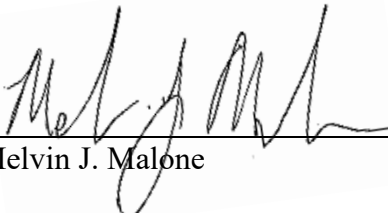
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Rachel C. Bowen
Counsel for the Consumer Advocate Unit
rachel.bowen@ag.tn.gov

Vance L. Broemel
Senior Assistant Attorney General
vance.broemel@ag.tn.gov

Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Unit
P.O. Box 20207
Nashville, TN 37202-0207

This the 19th day of May, 2021.



Melvin J. Malone