

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

IN RE:)	
)	
PETITION OF TENNESSEE-AMERICAN)	
WATER COMPANY REGARDING)	
CHANGES TO THE QUALIFIED)	
INFRASTRUCTURE INVESTMENT)	Docket No. 21-00030
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)	

**CONSUMER ADVOCATE’S MOTION TO EXTEND DEADLINE TO SUBMIT
PRE-FILED TESTIMONY**

The Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, respectfully moves the Commission to extend the deadline for the Consumer Advocate to submit pre-filed testimony in the above-captioned docket. In support of its motion, the Consumer Advocate states as follows:

1. On May 19, 2021, in Tennessee-American Water Company’s (TAWC) response to the Consumer Advocate’s second discovery request, TAWC indicated that its response was not complete and that it would be providing additional historic information to complete its response at a later date. May 19, 2021 was the deadline for TAWC’ response to the Consumer Advocate’s second discovery request.

2. On May 25, 2021, TAWC informed the Consumer Advocate that it will be providing its

complete response to the Consumer Advocate's second discovery request by Thursday, May 27, 2021.

3. Currently, the procedural schedule has a deadline of June 3, 2021 for the Consumer Advocate to submit its pre-filed testimony.

4. Given the delay in TAWC's response to the Consumer Advocate's second discovery request and the uncertainty of whether the Consumer Advocate will need to seek clarification of TAWC's response to the second set of discovery requests, the Consumer Advocate does not believe that the current deadline of June 3, 2021 will allow sufficient time for its submission of pre-filed testimony.

5. Thus, the Consumer Advocate respectfully requests the Commission extend the deadline for the Consumer Advocate to file its pre-filed testimony to June 7, 2021.

RESPECTFULLY SUBMITTED,



RACHEL C. BOWEN (*pro hac vice*)

Practicing 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

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2357

Fax: (615) 741-1026

Email: rachel.bowen@ag.tn.gov

Email: vance.broemel@ag.tn.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail and 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

This the 25th day of May, 2021.



RACHEL C. BOWEN

Counsel for the Consumer Advocate Unit