

BUTLER | SNOW

June 7, 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 in Support of the Calculation of the 2021 Capital Recovery Riders Reconciliation,***  
**TPUC Docket No. 21-00030**

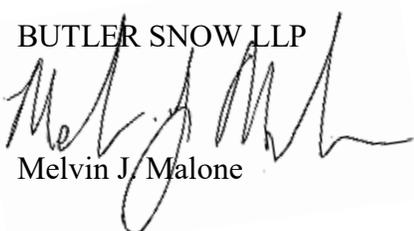
Dear Chairman Hill:

Attached for filing please find the *Supplemental Testimony of Todd P. Wright* 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

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BUTLER SNOW LLP

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**PETITIONER'S EXHIBIT TPW-3**

**TENNESSEE-AMERICAN WATER COMPANY, INC.**

**DOCKET NO. 21-00030**

**SUPPLEMENTAL TESTIMONY**

**OF**

**TODD P. WRIGHT**

**ON**

**PETITION OF TENNESSEE-AMERICAN WATER COMPANY IN SUPPORT OF THE  
CALCULATION OF THE 2021 CAPITAL RECOVERY RIDERS' RECONCILIATION  
CHANGES TO THE PRODUCTION COSTS AND OTHER PASS-THROUGHS RIDER**

**SPONSORING PETITIONER'S REVISED EXHIBITS:**

**PETITIONER'S REVISED EXHIBIT – CAPITAL RIDERS RECONCILIATION – TPW**  
**PETITIONER'S REVISED EXHIBIT – PROPOSED TARIFF SHEET NO. 12 – TPW**  
**PETITIONER'S REVISED EXHIBIT – ANNUAL APPROVED TARIFFS – TPW**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Todd P. Wright and my business address is One Water Street, Camden, New  
3 Jersey 08102.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by American Water Works Service Company (“AWW”) as Senior Manager  
6 in Regulatory Services. Upon the voluntary departure of Elaine K. Chambers, I have  
7 assumed the position of Interim Director, Rates and Regulatory on a temporary basis for  
8 Tennessee and Kentucky.

9 **Q. DID YOU SUBMIT DIRECT TESTIMONY IN THIS PROCEEDING?**

10 A. I have adopted the Pre-filed Direct Testimony of Elaine K. Chambers submitted in this case  
11 on March 1, 2021 on behalf of Tennessee-American Water Company (“Tennessee  
12 American,” “TAWC” or “Company”).

13 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?**

14 A. The purpose of my supplemental testimony is to revise TAWC’s calculation previously  
15 submitted on 3/1/2021. A billing issue related to private fire customers who pay in advance  
16 has been discovered.

17 **Q. CAN YOU ELABORATE FURTHER ON THIS BILLING ISSUE?**

18 A. Certainly. The billing issue for private fire customers pertains to customers that have  
19 terminated service since the inception of the alternative rate mechanisms authorized in  
20 Docket No. 13-00130. Since the departing private fire customers pay in advance for a  
21 quarter, these customers should receive partial credits for the portion of the quarter during  
22 which they will not be receiving service. In reviewing the customer credits being given to  
23 such departing private fire customers, it was discovered that the Company has been

1 crediting the entire amount of the surcharge revenues originally billed to each such  
2 departing/terminating customer going back to the effective date of the alternate rate  
3 mechanisms (i.e., the Capital Recovery Riders and the PCOP Rider)

4 **Q. WHAT IS THE OVERALL EFFECT OF THIS BILLING CREDITS ISSUE?**

5 A. The net amount of the billing over-credits described above is \$156,185. The one-time  
6 adjustment essentially removes the private fire under-collection from the capital rider  
7 reconciliation amount, reducing the original amount filed in this docket. This one-time  
8 adjustment corrects the billing over-credits going back to the effective date of the  
9 alternative rate mechanisms.

10 **Q. CAN YOU ELABORATE ON WHY THIS ONE-TIME ADJUSTMENT IS**  
11 **NECESSARY?**

12 A. The one-time adjustment ensures that other customer classes are not being impacted by the  
13 private fire over-credits. Since the departing private fire customers were being over-  
14 credited on their final bills, the Company is reducing this net amount of \$156,185 from the  
15 capital rider reconciliation. With this adjustment, the billing credits that were returned in  
16 excess to the departing private fire customers is corrected, removing the impact on all  
17 other customer classifications.

18 **Q. HAVE CORRECTIVE MEASURES BEEN IMPLEMENTED TO RESOLVE THIS**  
19 **BILLING ISSUE GOING FORWARD?**

20 A. Yes. The proration logic for the capital rider surcharge rates has been updated in the  
21 Company's billing system addressing the advance private fire credits upon termination of  
22 service.

1 **Q. ARE YOU SPONSORING ANY REVISED EXHIBITS?**

2 **A.** Yes, I am. I am sponsoring the following revised exhibits:

3 Petitioner's Revised Exhibit – Capital Riders' Reconciliation – TPW  
4 Petitioner's Revised Exhibit – Proposed Tariff Sheet No. 12 – TPW  
5 Petitioner's Revised Exhibit – Annual Approved Tariffs – TPW  
6

7 **Q. WERE THE PETITIONER'S EXHIBITS LISTED ABOVE PREPARED BY YOU**  
8 **OR UNDER YOUR DIRECTION AND SUPERVISION?**

9 **A.** Yes.

10 **Q. WHAT WERE THE SOURCES OF THE DATA USED TO PREPARE THE**  
11 **PETITIONER'S EXHIBITS LISTED ABOVE?**

12 **A.** The data used to prepare the exhibits was acquired from the books of account and business  
13 records of Tennessee American and other internal sources, which I examined in the course  
14 of my investigation of the matters addressed in this testimony.

15 **Q. DO YOU CONSIDER THIS DATA TO BE RELIABLE AND OF A TYPE THAT IS**  
16 **NORMALLY USED AND RELIED ON IN YOUR BUSINESS FOR SUCH**  
17 **PURPOSES?**

18 **A.** Yes.

19 **Q. DO ANY OF THE PETITIONER'S REVISED EXHIBITS REPLACE ANY**  
20 **EXHIBITS PREVIOUSLY SUBMITTED IN THIS MATTER?**

21 **A.** Yes. The three exhibits attached to my supplemental testimony replace the exhibits  
22 previously filed on 3/1/2021.

23 **Q. DO THE PETITIONER'S REVISED EXHIBITS LISTED ABOVE ACCURATELY**  
24 **SUMMARIZE SUCH DATA AND THE RESULTS OF ANALYSIS USING SUCH**  
25 **DATA?**

1 A. Yes, they do. The revised exhibits reference the Company’s response to Consumer  
2 Advocate Unit’s Discovery Request 2-2, in which the Company provided the source  
3 information from the private fire billing issue.

4 **Q. HAVE YOU INCLUDED THE REVISED CALCULATION OF THE 2021**  
5 **CAPITAL RECOVERY RIDERS’ RECONCILIATION FROM WHAT WAS**  
6 **ORIGINALLY SET FORTH IN THE PETITION?**

7 A. Yes. I have attached an exhibit that reflects the revised calculation of the 2021 Capital  
8 Riders Reconciliation. The detailed calculations are attached in an exhibit to my  
9 supplemental testimony as Petitioner’s Revised Exhibit - Capital Riders’  
10 Reconciliation – TPW. The adjustment for the net billing credits is shown on line 29. Due  
11 to the reduction for the billing credits, an additional reduction in interest is also included  
12 on line 31.

13 **Q. HOW ARE THE 2021 CAPITAL RECOVERY RIDERS’ RECONCILIATION**  
14 **RECOVERED?**

15 A. The 2021 Capital Recovery Riders Reconciliation is expressed as a percentage. The  
16 proposed revised tariff sheet Twenty-Fourth Revised Sheet No. 12 – Riders - 1 is attached  
17 to my supplemental testimony as Petitioner’s Revised Exhibit - Proposed Sheet No. 12  
18 – TPW.

19 **Q. WHAT IS THE REVISED PROPOSED QIIP RIDER?**

20 A. TAWC is proposing a QIIP Rider that results in revenue recovery of \$842,114 for nine  
21 months of 2021 year or a surcharge of 2.39%. TAWC originally proposed a QIIP Rider  
22 that resulted in revenue recovery of \$936,467 for nine months of 2021 year or a surcharge  
23 of 2.65%.

1 **Q. WHAT IS THE REVISED PROPOSED EDI RIDER?**

2 A. TAWC is proposing an EDI Rider that results in revenue recovery of (\$-180,376) for nine  
3 months of 2021 year or a surcharge of -.51%. TAWC originally proposed an EDI Rider  
4 that resulted in a total revenue refund of (\$174,802) for nine months of 2021 year or a  
5 surcharge of -0.50%.

6 **Q. WHAT IS THE REVISED PROPOSED SEC RIDER?**

7 A. TAWC is proposing a SEC Rider that results in revenue recovery of \$218,713 for nine  
8 months of 2021 year or a surcharge of .62%. TAWC originally proposed a SEC Rider that  
9 resulted in a total revenue recovery of \$277,509 for nine months of 2021 year or a surcharge  
10 of .79%.

11 **Q. WHAT IS THE IMPACT TO THE AVERAGE CUSTOMER BILL SUBMITTED  
12 IN THE ORIGINAL FILING ON 3/1/2021?**

13 A. The typical residential customer living in the City of Chattanooga, using an average of  
14 4,154 gallons per month, will see an increase in their bill of \$0.63 per month, or \$5.70 in  
15 2021.

16 **Q. WHAT IS THE IMPACT TO THE AVERAGE CUSTOMER BILL BEING  
17 SUBMITTED IN THE SUPPLEMENTAL TESTIMONY?**

18 A. The typical residential customer living in the City of Chattanooga, using an average of  
19 4,154 gallons per month, will see an increase in their bill of \$0.54 per month, or \$4.86 in  
20 2021. I am also providing the updated table reflecting the detailed changes for each Capital  
21 Recovery Rider, including the reconciliations. This is attached to my testimony as

22 **Petitioner's Revised Exhibit – Annual Approved Tariffs – TPW.**

1 **Q. WHAT DO YOU RECOMMEND IN REGARD TO THE PETITION?**

2 A. I recommend that the petition be approved for the adjustment in the 2021 Capital Rider  
3 Reconciliation, as amended by my supplemental testimony.

4 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

5 A. Yes.

Tennessee American Water Company  
 Qualified Infrastructure Improvement Program Rider (QIIP)  
 Economic Development Investment Rider (EDI)  
 Safety and Environmental Compliance Rider (SEC)  
 Reconciliation of the Calculation of Revenue Requirement  
 As of 12/31/2020

Line Number	Description	Qualified Infrastructure Investment Program QIIP			Economic Development Investment EDI			Safety and Environmental Compliance SEC			Total		
		Average YTD 12/31/2020			Average YTD 12/31/2020			Average YTD 12/31/2020			Average YTD 12/31/2020		
		Actual	Budget	Variance	Actual	Budget	Variance	Actual	Budget	Variance	Actual	Budget	Variance
1	Additions Subject to Rider:	\$62,350,731	\$61,042,389	\$1,308,343	\$3,333,421	\$4,897,499	(\$1,564,079)	\$35,446,319	\$35,915,099	(\$468,780)	\$101,130,471	\$101,854,987	(\$724,516)
2	Plus: Cost of Removal less Salvage	10,616,845	8,979,803	1,637,042	2,021	933	1,088	3,821,246	3,621,793	199,453	14,440,112	12,602,529	1,837,583
3	Less: Contributions in Aid to Construction (CIAC)	2,312,697	2,300,403	12,294	128,439	58,274	70,165	0	0	0	2,441,136	2,358,677	82,459
4	Less: Deferred Income Taxes	7,820,953	8,206,197	(385,244)	199,221	274,937	(75,716)	4,622,706	4,818,563	(195,857)	12,642,880	13,299,697	(656,817)
5	Less: Accumulated Depreciation	3,897,577	3,501,288	396,289	96,356	117,977	(21,621)	3,076,391	2,949,109	127,282	7,070,324	6,568,374	501,950
6	Net Investment Supplied Additions:	\$58,936,350	\$56,014,304	\$2,922,046	\$2,911,425	\$4,447,244	(\$1,535,819)	\$31,568,469	\$31,769,220	(\$200,752)	\$93,416,244	\$92,230,768	\$1,185,476
7													
8	Pre-Tax Authorized Rate of Return:	8.45%	8.45%		8.45%	8.45%		8.45%	8.45%		8.45%	8.45%	
9	Pre-Tax Return on Additions:	\$4,980,978	\$4,734,022	\$246,955	\$246,058	\$375,857	(\$129,799)	\$2,667,994	\$2,684,961	(\$16,966)	\$7,895,029	\$7,794,840	\$100,190
10													
11	Depreciation Expense on Additions:	1,515,622	1,086,583	429,039	45,665	77,211	(31,547)	1,054,961	878,992	175,968	2,616,247	2,042,787	573,461
12													
13	Property and Franchise Taxes Associated:	762,017	692,955	69,063	45,045	66,157	(21,112)	448,308	446,418	1,890	1,255,370	1,205,529	49,841
14													
15	Revenues:	7,258,617	6,513,560	745,057	336,767	519,225	(182,458)	4,171,263	4,010,371	160,892	11,766,647	11,043,155	723,492
16													
17	Revenue Taxes	3.19%	3.19%		3.19%	3.19%		3.19%	3.19%		3.19%	3.19%	
18	Capital Riders Revenues with Revenue Taxes	7,497,874	6,728,259	769,615	347,868	536,339	(188,472)	4,308,755	4,142,560	166,195	12,154,497	11,407,158	747,339
19													
20	APP Revenue Reduction	(4,558)	(4,558)		(168)	(168)		(4,700)	(4,700)		(9,426)	(9,426)	
21													
22	Total Capital Riders Revenues with Revenue Taxes & APP	\$7,493,316	\$6,723,700	\$769,615	\$347,700	\$536,171	(\$188,472)	\$4,304,056	\$4,137,860	\$166,195	\$12,145,071	\$11,397,732	\$747,339
23													
24													
25	Actual Capital Riders Revenues Billed		\$5,755,127			\$339,975			\$3,586,321			\$9,681,424	
26													
27	(Over)/Under Capital Riders Revenue Billings		968,574			196,196			551,539			1,716,308	
28	Budget to Actual Adjustment		769,615			(188,472)			166,195			747,339	
29	Private Fire Billing Adjustment		(92,844)			(5,485)			(57,856)			(156,185) (a)	
30	2019 Reconciliation Amount		(816,696)			(179,731)			(444,662)			(1,441,090)	
31	Earnings Test Adjustment		0			0			0			0	
32	Interest (Prime - 3.25%)		13,466			(2,884)			3,497			14,079	
33													
34	Reconciliation Amount		\$842,114			(\$180,376)			\$218,713			\$880,451	
35													
36	Authorized Capital Riders Revenues (9/12th)		\$35,305,293			\$35,305,293			\$35,305,293			\$35,305,293	
37													
38	Current Reconciliation Factor Percentage		2.39%			-0.51%			0.62%			2.50%	
39													

Explanation:

Tennessee American Water has been authorized 3 capital riders based on a 13-month average of in-service capital projects in the forecasted period. The revenue requirement for each rider is calculated similar to how total rate base is calculated by the Tennessee Public Utility Commission in a rate case. This table shows a comparison of the actual average over the reporting period to the proposed amount of each rider, and the total of the three.

\*Taxes - From Docket #19-00105 which was approved on 6/1/2020.  
 Earnings Test - Calculation methodology from Earnings Test workpaper

(a) Per company's response to Consumer Advocate Unit Discovery Request 2-002 Supplemental

**CLASSIFICATION OF SERVICE**

**SUMMARY OF RIDERS**

**1. Applicability**

In addition to the other charges provided for in this Tariff under Service Classifications Residential, Commercial, Industrial, Other Public Authority, Sales for Resale, and Private Fire, a Qualified Infrastructure Improvement Program (“QIIP”) Rider, an Economic Development Investment Program Rider (“EDI”), a Safety and Environmental Compliance Program Rider (SEC”), and Production Costs and Other Pass-Throughs Rider (“PCOP”) will apply to customers in all service areas.

**2. The Percentage of Riders and Reconciliations**

For the Riders defined in the tariffs:

QIIP	19.14%
EDI	1.25%
<u>SEC</u>	<u>9.70%</u>
Subtotal of all Capital Recovery Riders	30.09%
QIIP Annual Reconciliation Percentage	2.39% (I)
EDI Annual Reconciliation Percentage	-0.51% (D)
<u>SEC Annual Reconciliation Percentage</u>	<u>0.62% (I)</u>
Subtotal of all Capital Recovery Riders	2.50% (I)
Total of Capital Recovery Riders and Reconciliation Percentages	32.59% (I)
Offset to Capital Recovery Riders for TCJA savings	-6.62%
Offset to Capital Recovery Riders for TCJA Excess ADIT	-4.54%
PCOP	-0.65%

(D) Indicates Decrease

(I) Indicates Increase

**ISSUED: June 7, 2021      EFFECTIVE: July 7, 2021**

**BY:**



**Grant A. Evitts  
PRESIDENT**

**109 Wiehl Street  
Chattanooga, Tennessee 37403**

**Authorization of Tennessee American Water Capital Recovery Riders  
Since Last Rate Case (Docket No. 12-00049)**

TPUC Docket No.	Effective Date	Rider	Authorized Annual Change	Total Cumulative Rider	Reconciliation Authorized	Authorized Rider Total	Capital Riders		
							Total	TCJA Offset	Impact to Bill
13-00130	4/15/2014	QIIP	0.790%	0.790%	0.000%	0.790%			
		EDI	0.180%	0.180%	0.000%	0.180%			
		SEC	0.110%	0.110%	0.000%	0.110%			
		<b>Total</b>	<b>1.080%</b>		<b>0.000%</b>		<b>1.080%</b>	<b>0.00%</b>	<b>1.080%</b>
14-00121	6/30/2015	QIIP	1.340%	2.130%	0.000%	2.130%			
		EDI	-0.130%	0.050%	0.000%	0.050%			
		SEC	3.430%	3.540%	0.000%	3.540%			
		<b>Total</b>	<b>4.640%</b>		<b>0.000%</b>		<b>5.720%</b>	<b>0.00%</b>	<b>5.720%</b>
15-00029*	11/1/2015	QIIP	0.000%	2.130%	0.254%	2.384%			
		EDI	0.000%	0.050%	-0.150%	-0.100%			
		SEC	0.000%	3.540%	0.064%	3.604%			
		<b>Total</b>	<b>0.000%</b>	<b>5.720%</b>	<b>0.168%</b>		<b>5.888%</b>	<b>0.00%</b>	<b>5.888%</b>
15-00111	3/15/2016	QIIP	2.430%	4.560%	0.000%	4.560%			
		EDI	0.050%	0.100%	0.000%	0.100%			
		SEC	2.180%	5.720%	0.000%	5.720%			
		<b>Total</b>	<b>4.660%</b>		<b>0.000%</b>		<b>10.380%</b>	<b>0.00%</b>	<b>10.380%</b>
16-00022*	10/11/2016	QIIP	0.000%	4.560%	1.166%	5.726%			
		EDI	0.000%	0.100%	-0.178%	-0.078%			
		SEC	0.000%	5.720%	-0.118%	5.602%			
		<b>Total</b>	<b>0.000%</b>		<b>0.870%</b>		<b>11.250%</b>	<b>0.00%</b>	<b>11.250%</b>
16-00126	3/14/2017	QIIP	2.960%	7.520%	0.000%	7.520%			
		EDI	0.240%	0.340%	0.000%	0.340%			
		SEC	0.370%	6.090%	0.000%	6.090%			
		<b>Total</b>	<b>3.570%</b>		<b>0.000%</b>		<b>13.950%</b>	<b>0.00%</b>	<b>13.950%</b>
17-00020*	8/16/2017	QIIP	0.000%	7.520%	1.763%	9.283%			
		EDI	0.000%	0.340%	-0.031%	0.309%			
		SEC	0.000%	6.090%	-0.826%	5.264%			
		<b>Total</b>	<b>0.000%</b>		<b>0.906%</b>		<b>14.856%</b>	<b>0.00%</b>	<b>14.856%</b>
17-00124	4/10/2018	QIIP	2.530%	10.050%	0.000%	10.050%			
		EDI	0.070%	0.410%	0.000%	0.410%			
		SEC	-0.120%	5.970%	0.000%	5.970%			
		<b>Total</b>	<b>2.480%</b>		<b>0.000%</b>		<b>16.430%</b>	<b>0.00%</b>	<b>16.430%</b>
18-00022*	12/17/2018	QIIP	0.000%	10.050%	1.542%	11.592%			
		EDI	0.000%	0.410%	-0.081%	0.329%			
		SEC	0.000%	5.970%	-0.628%	5.342%			
		<b>Total</b>	<b>0.000%</b>		<b>0.833%</b>		<b>17.263%</b>	<b>0.00%</b>	<b>17.263%</b>
18-00120	9/1/2019	QIIP	1.600%	11.650%	0.000%	11.650%			
		EDI	0.240%	0.650%	0.000%	0.650%			
		SEC	0.910%	6.880%	0.000%	6.880%			
		<b>Total</b>	<b>2.750%</b>		<b>0.000%</b>		<b>19.180%</b>	<b>-6.62%</b>	<b>12.560%</b>
19-00031*	12/9/2019	QIIP	0.000%	11.650%	-1.140%	10.510%			
		EDI	0.000%	0.650%	-0.320%	0.330%			
		SEC	0.000%	6.880%	-0.920%	5.960%			
		<b>Total</b>	<b>0.000%</b>		<b>-2.380%</b>		<b>16.800%</b>	<b>-6.62%</b>	<b>10.180%</b>
19-00105	1/1/2020	QIIP	2.630%	14.280%	0.000%	14.280%			
		EDI	0.490%	1.140%	0.000%	1.140%			
		SEC	1.910%	8.790%	0.000%	8.790%			
		<b>Total</b>	<b>5.030%</b>		<b>0.000%</b>		<b>24.210%</b>	<b>-6.62%</b>	<b>17.590%</b>
20-00028*	4/1/2020	QIIP	0.000%	14.280%	-2.310%	11.970%			
		EDI	0.000%	1.140%	-0.510%	0.630%			
		SEC	0.000%	8.790%	-1.260%	7.530%			
		<b>Total</b>	<b>0.000%</b>		<b>-4.080%</b>		<b>20.130%</b>	<b>-6.62%</b>	<b>13.510%</b>
20-00128	1/1/2021	QIIP	4.860%	19.140%	0.000%	19.140%			
		EDI	0.110%	1.250%	0.000%	1.250%			
		SEC	0.910%	9.700%	0.000%	9.700%			
		<b>Total</b>	<b>5.880%</b>		<b>0.000%</b>		<b>30.090%</b>	<b>-11.16%</b>	<b>18.930%</b>
21-000XX*	4/1/2021	QIIP	0.000%	19.140%	2.390%	21.530%			
		EDI	0.000%	1.250%	-0.510%	0.740%			
		SEC	0.000%	9.700%	0.620%	10.320%			
		<b>Total</b>	<b>0.000%</b>		<b>2.500%</b>		<b>32.590%</b>	<b>-11.16%</b>	<b>21.430%</b>

\* Reconciliations are only effective until December 31 of the year authorized by the TPUC.



CERTIFICATE OF SERVICE

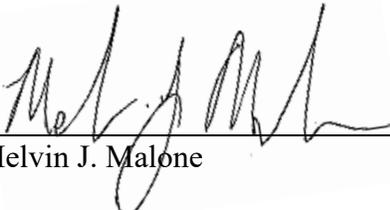
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Rachel C. Bowen  
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This the 7<sup>th</sup> day of June, 2021.

  
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