

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

IN RE:

**PETITION OF TENNESSEE-AMERICAN
WATER COMPANY REGARDING THE
2022 PRODUCTION COSTS AND OTHER
PASS-THROUGHS RIDER**

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Docket No. 22-00005

**CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST
TO TENNESSEE-AMERICAN WATER COMPANY**

To: Melvin J. Malone
Butler Snow LLP
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
Melvin.Malone@butlersnow.com

Tricia Sinapole
Director of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2223 Duke Street
Alexandria, VA 22314
Tricia.Sinapole@amwater.com

This Second Discovery Request is hereby served upon Tennessee American Water Company ("TAWC" or the "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 Vance L. Broemel on or before April 18, 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 TAWC* sent to the Company on March 4, 2022, 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. Refer to the Company's Response to Consumer Advocate's DR No. 1-2. In its response, the Company stated, "The purchased water and power expense for 2019 is an estimate based on TAWC 2021 actuals amounts, as described on page 15, lines 1 to 12 in the Direct Testimony of Tricia N. Sinopole." This response failed to answer the question presented to the Company in DR No. 1-2, below:

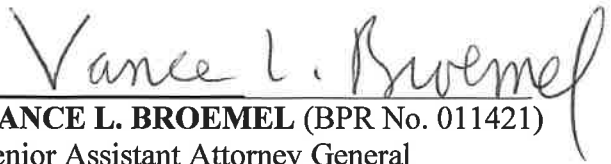
Confirm that the values for purchased water and power expenses for 2019 can be sourced from two confidential documents filed by the Company with the Commission: (1) the Direct Testimony of Tricia N. Sinopole, <TAW_EXH_TNS_1_011422.xlsx> and (2) the Company's Response to Consumer Advocate DR No. 1-17, File <CONFIDENTIAL -1-17 Attachment.xlsx> in TPUC Docket No. 20-00011.

RESPONSE:

2-2. Refer to the Company's Response to Consumer Advocate's DR No. 1-2 and the Direct Testimony of Tricia N. Sinopole at 15:1-12. Explain in detail why the Company has estimated the purchase water and power expenses for 2019 based upon TAWC 2021 actuals when the 2019 actual purchased water and power expenses can be sourced from two confidential documents filed by the Company with the Commission.

RESPONSE:

RESPECTFULLY SUBMITTED,


VANCE L. BROEMEL (BPR No. 011421)
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TPUC Docket No. 22-00005,
Consumer Advocate's Second Discovery Requests

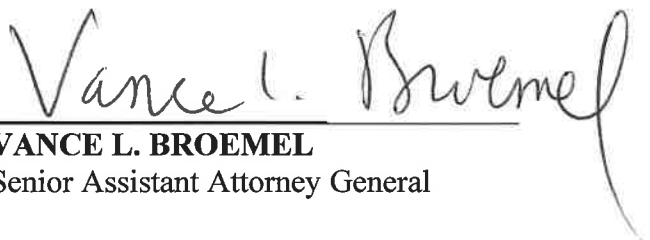
CERTIFICATE OF SERVICE

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

Melvin J. Malone
Butler Snow LLP
The Pinnacle at Symphony Place
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Nashville, TN 37201
Melvin.Malone@butlersnow.com

Tricia Sinopole
Director of Rates and Regulation – Tennessee and Kentucky
Kentucky American Water Company
2223 Duke Street
Alexandria, VA 22314
Tricia.Sinopole@amwater.com

This the 6th day of April 2022.


VANCE L. BROEMEL
Senior Assistant Attorney General