

BUTLER | SNOW

August 29, 2022

VIA ELECTRONIC FILING

Hon. Herb Hilliard, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on August 29, 2022 at 4:02 p.m.

RE: *In Re: Joint Petition of Tennessee-American Water Company and Walker County Water and Sewerage Authority for Expedited Approval of a Special Contract, Docket No. 22-00049*

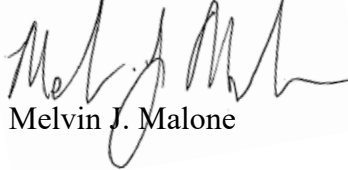
Dear Chairman Hilliard:

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, the original plus four (4) hard copies 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: Bob Lane, TAWC
Grady Stout, TAWC
Shannon Whitfield, WCWSA
Karen H. Stachowski, Consumer Advocate Division
Vance Broemel, Consumer Advocate Division

*The Pinnacle at Symphony Place
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Nashville, TN 37201*

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BUTLER SNOW LLP

65422662.v1

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

IN RE:

**JOINT PETITION OF TENNESSEE-
AMERICAN WATER COMPANY AND
WALKER COUNTY WATER AND
SEWERAGE AUTHORITY FOR
APPROVAL OF A SPECIAL CONTRACT**

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DOCKET NO. 22-00049

**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 Division in the Office of the Attorney General (“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. 22-00049
SECOND SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE

Responsible Witness: Grady Stout

Question:

- 2-1.** Contract Terms. Refer to the Joint Petition, Exhibit A, Paragraph 2b, which reads as follows:

WCWSA shall pay a rate of \$1.75 per 1000 gallons, inclusive of Tax Cuts and Jobs Act ("TCJA") and Capital Riders (the "Purchased Water Rate"). The Purchased Water Rate shall be adjusted, to the extent necessary, to reflect the then applicable Capital Riders approved by the Tennessee Public Utility Commission ("TPUC").

Please provide the following information related to this paragraph.

- a. Is it the Company's intention to apply the Commission approved Capital and Tax Rider surcharge rates on top of the proposed \$1.75 usage rate to Walker County?
- b. Is it the Company's intention to apply the Commission approved PCOP Rider surcharge rate on top of the proposed \$1.75 usage rate to Walker County?
- c. Provide an example of the proposed "Purchased Water Rate" calculation to Walker County using the rider surcharge rates currently approved by TPUC.

Response:

- A. Yes, the company's intention is to apply the capital recovery riders so that initial base rate and riders will total \$1.75 at time of approval.
- B. Yes, like the company intends to do for its capital recovery riders, the PCOP rider will be included in the \$1.75 total.
- C.

Customer	Base Rate	Capital Rider Surcharge (33.26%)	PCOP Rider Surcharge (0.54%)	Tax Sur-credit (-11.16%)	Total
WCWSA	\$1.426940	\$0.474600	\$0.007705	-\$0.159247	\$1.75

TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00049
SECOND SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE

Responsible Witness:

Question:

- 2-2. Billing Rates. Refer to the Company's Response to the Consumer Advocate's DR No. 1-1 regarding base billing rates for other TPUC approved Special Contracts which is reproduced in part below. In addition to these base billing rates, provide the TPUC approved rider surcharges that are applied to these customers shown on the table below along with the billing rates for Jasper Highlands.

Customer	Base Rate	Capital Rider Surcharge	PCOP Rider Surcharge	Tax Rider Surcharge	Total
Town of Signal Mountain	\$1.382887				
City of Fort Oglethorpe	1.409492				
Catoosa County Utility District	1.624598				
Walden's Ridge Utility District	1.628342				
Jasper Highlands					

Response:

See table. Walden's Ridge is no longer a customer.

Customer	Base Rate	Capital Rider Surcharge (33.26%)	PCOP Rider Surcharge (0.54%)	Tax Sur-credit (-11.16%)	Total
Town of Signal Mountain	\$1.382887	\$0.459948	\$0.007468	-\$0.154330	\$1.695973
City of Fort Oglethorpe	\$1.409492	\$0.468797	\$0.007611	-\$0.157299	\$1.728601
Catoosa County Utility District	\$1.624598	\$0.540341	\$0.008772	-\$0.181305	\$1.992406
Walden's Ridge Utility District	\$1.628342	N/A	N/A	N/A	N/A
Jasper Highlands	\$52.15 *	\$17.34509	\$0.28161	-\$5.81994	\$63.956760

*\$52.15 is base rate for first 2,500 gallons.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00049
SECOND SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness:

Question:

2-3. Billing Rates. Provide a copy of the Company's most current bill for each of the customers listed in DR No. 2-2 above.

Response: See attachments.

7.22.22 -8.18.22.pdf

7.20.22 - 8.16.22.pdf

7.8.22 - 8.4.22.pdf



WE KEEP LIFE FLOWING™

Service Address:

CITY OF FORT OGLETHORPE
LAFAYETTE RD
FT OGLETHORPE, GA 30742

THANK YOU FOR BEING OUR CUSTOMER

Important Account Messages

- Want to get to know us better? Visit www.tennesseeamwater.com to learn more about the services we provide.
- Thank you for being a long time customer! We work hard every day to deliver water service that is safe, reliable, and affordable -- our customers deserve nothing less.

For more information, visit www.tennesseeamwater.com

Statement

Account No. **1026-210015017258**


Total Amount Due:	\$46,630.66
Payment Due By:	September 14, 2022


Billing Date: August 23, 2022
Service Period: Jul 20 to Aug 16 (28 Days)
Total Gallons: 27,696,200


Account Summary – See page 3 for Account Detail

Prior Billing:		\$37,628.31
Payments - Thank You!	-	\$37,628.31
Balance Forward:	=	\$0.00
Service Related Charges:	+	\$46,630.66
Total Amount Due:	=	\$46,630.66

 **View your account information or pay your bill anytime at:** www.amwater.com/MyAccount

 **Pay by Phone*:** Pay anytime at 1-855-748-6066
*A convenience fee may apply

 **Customer Service:** 1-866-736-6420
M-F 7:00am to 7:00pm – Emergencies 24/7

 **TENNESSEE AMERICAN WATER**
PO BOX 6029
CAROL STREAM, IL 60197-6029

▼ Please return bottom portion with your payment. DO NOT send cash. Retain upper portion for your records. ▼

Account No. **1026-210015017258**

Total Amount Due:	\$46,630.66
Payment Due By:	September 14, 2022

If paying after 9/14/22, pay this amount: \$48,962.19

Amount Enclosed \$



P.O. BOX 91623
RANTOUL, IL 61866-8623

Service to: LAFAYETTE RD
FT OGLETHORPE, GA 30742

CITY OF FORT OGLETHORPE
P.O. BOX 5509
FORT OGLETHORPE, GA 30742-0709

TENNESSEE AMERICAN WATER
PO BOX 6029
CAROL STREAM, IL 60197-6029

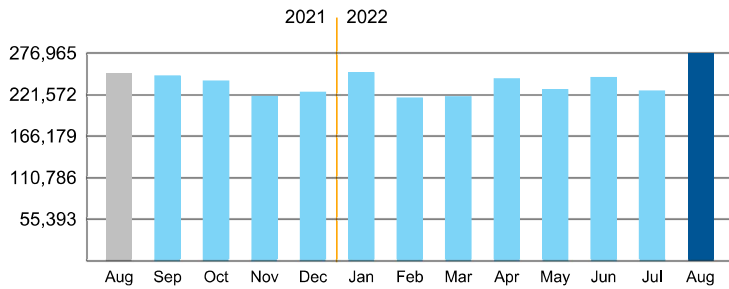
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Meter Reading and Usage Summary

Please see additional pages for meter reading details

Billed Usage History (graph shown in 100 gallons)

- 27,696,200 gallons = usage for this period
- 24,964,800 gallons = usage for same period last year



Next Scheduled Read Date: on or about September 19, 2022
Account Type: Sale for Resale

Average
daily use for
this period is:
(28 days)

989,150
gallons

Year to Date Billed Usage: 190,726,400 gallons

Account Detail

Account No. 1026-210015017258

Service To: LAFAYETTE RD FT OGLETHORPE, GA 30742

Prior Billing 37,628.31

Payments -37,628.31

Total payments as of Aug 11. Thank you! -37,628.31

Balance Forward 0.00

Service Related Charges - 07/20/22 to 08/16/22

Water Service 39,037.57

Water Usage Charge		
07/20/22 to 08/07/22	(187,938.52 x	26,489.78
\$0.1409492)		
08/08/22 to 08/16/22	(89,023.48 x	12,547.79
\$0.1409492)		

Other Charges 7,593.09

Expense Recovery Riders	210.80
Capital Recovery Riders	7,382.29

Total Service Related Charges 46,630.66

Total Current Period Charges 46,630.66

Total Amount Due



\$46,630.66

Understanding Your Bill

The information below defines some of the new terms you may find on your bill:

- **Service Related Charges:** This section includes charges for services related to water, wastewater and fire protection. If applicable, credits and debits for correction to previously billed charges are itemized in this section.
- **Fees and Adjustments:** This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.
- **Expense & Capital Recovery Riders:** The riders are applied to all water charges. The Expense Recovery Rider is based on our actual expenses for items like electricity and chemicals and is compared to what we projected we would spend. If we spend less than we budget for, this is a reduction on your bill with the negative sign. The Capital Recovery Riders are for capital projects like new pipes, fire hydrants, water treatment equipment, and mains for economic development projects. The Capital Recovery Rider is calculated for a particular year, and is based on the costs of capital projects. It has been in place since 2013.
- **Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
- **Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- **Still have questions?** We are here to help. Our customer service representatives are available M–F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

For more information about your charges and rates, please visit:
<https://amwater.com/tnaw/rates>

Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
72039998	100 gal	4"	07/20/2022	08/16/2022	895,760 (A)	930,497 (A)	34,737	34,737.00	3,473,700
72040009	100 gal	4"	07/20/2022	08/16/2022	309,973 (A)	340,758 (A)	30,785	30,785.00	3,078,500
72040788	100 gal	4"	07/20/2022	08/16/2022	999,672 (A)	83,940 (A)	84,268	84,268.00	8,426,800
72040790	100 gal	4"	07/20/2022	08/16/2022	945,922 (E)	73,094 (A)	127,172	127,172.00	12,717,200
79898902	100 gal	6"	07/20/2022	08/16/2022	846,900 (A)	846,900 (A)	0	0.00	0

A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 27,696,200



WE KEEP LIFE FLOWING™

Service Address:

TOWN OF SIGNAL MOUNTAIN
5 WEEKS ST
CHATTANOOGA, TN 37405-1641

THANK YOU FOR BEING OUR CUSTOMER

Important Account Messages

- Want to get to know us better? Visit www.tennesseeamwater.com to learn more about the services we provide.
- Thank you for being a long time customer! We work hard every day to deliver water service that is safe, reliable, and affordable -- our customers deserve nothing less.

For more information, visit www.tennesseeamwater.com

Statement

Account No. **1026-210014897802**

Total Amount Due:	\$42,519.19
Payment Due By:	September 13, 2022


Thank you for using AutoPay. Payment will be automatically deducted on the bill due date.


Billing Date: August 22, 2022
Service Period: Jul 22 to Aug 18 (28 Days)
Total Gallons: 25,688,400


Account Summary – See page 3 for Account Detail

Prior Billing:	\$46,319.74
Payments - Thank You!	– \$46,319.74
Balance Forward:	= \$0.00
Service Related Charges:	+ \$42,519.19
Total Amount Due:	= \$42,519.19

 **View your account information or pay your bill anytime at:** www.amwater.com/MyAccount

 **Pay by Phone*:** Pay anytime at 1-855-748-6066
*A convenience fee may apply

 **Customer Service:** 1-866-736-6420
M-F 7:00am to 7:00pm – Emergencies 24/7

 **TENNESSEE AMERICAN WATER**
PO BOX 6029
CAROL STREAM, IL 60197-6029

▼ Please return bottom portion with your payment. DO NOT send cash. Retain upper portion for your records. ▼

Account No. **1026-210014897802**

Total Amount Due:	\$42,519.19
Payment Due By:	September 13, 2022

If paying after 9/13/22, pay this amount: \$44,645.15

Amount Enclosed \$ **Paid Electronically on Due Date**



WE KEEP LIFE FLOWING™



P.O. BOX 91623
RANTOUL, IL 61866-8623

Service to: 5 WEEKS ST
CHATTANOOGA, TN 37405-1641

TOWN OF SIGNAL MOUNTAIN
1111 RIDGEWAY AVE
SIGNAL MOUNTAIN, TN 37377-3146

TENNESSEE AMERICAN WATER
PO BOX 6029
CAROL STREAM, IL 60197-6029

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Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
72038469	100 gal	6"	07/22/2022	08/18/2022	2,829,991 (E)	2,989,466 (A)	159,475	159,475.00	15,947,500
72038474	100 gal	4"	07/22/2022	08/18/2022	722,356 (A)	819,765 (A)	97,409	97,409.00	9,740,900

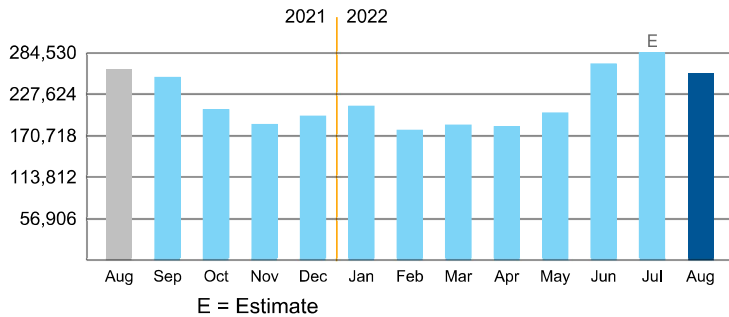
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 25,688,400

Billed Usage History (graph shown in 100 gallons)

- 25,688,400 gallons = usage for this period
- 26,176,000 gallons = usage for same period last year



Next Scheduled Read Date: on or about September 21, 2022
Account Type: Sale for Resale

Average
daily use for
this period is:
(28 days)

917,443
gallons

Year to Date Billed Usage: 177,082,400 gallons

Account Detail

Account No. 1026-210014897802

Service To: 5 WEEKS ST CHATTANOOGA, TN 37405-1641

Prior Billing 46,319.74

Payments -46,319.74

Total payments as of Aug 17. Thank you! -46,319.74

Balance Forward 0.00

Service Related Charges - 07/22/22 to 08/18/22

Water Service 35,524.17

Water Usage Charge
07/22/22 to 08/07/22 (161,187.85 x \$0.13828877) 22,290.47
08/08/22 to 08/18/22 (95,696.15 x \$0.13828877) 13,233.70

Other Charges 6,995.02

Expense Recovery Riders 191.83
Capital Recovery Riders 6,803.19

Total Service Related Charges 42,519.19

Total Current Period Charges 42,519.19

Total Amount Due



\$42,519.19

Understanding Your Bill

The information below defines some of the new terms you may find on your bill:

- Service Related Charges:** This section includes charges for services related to water, wastewater and fire protection. If applicable, credits and debits for correction to previously billed charges are itemized in this section.
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- Expense & Capital Recovery Riders:** The riders are applied to all water charges. The Expense Recovery Rider is based on our actual expenses for items like electricity and chemicals and is compared to what we projected we would spend. If we spend less than we budget for, this is a reduction on your bill with the negative sign. The Capital Recovery Riders are for capital projects like new pipes, fire hydrants, water treatment equipment, and mains for economic development projects. The Capital Recovery Rider is calculated for a particular year, and is based on the costs of capital projects. It has been in place since 2013.
- Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
- Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- Still have questions?** We are here to help. Our customer service representatives are available M-F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

For more information about your charges and rates, please visit:
<https://amwater.com/tnaw/rates>



WE KEEP LIFE FLOWING™

Service Address:

CATOOSA UTILITY DISTRICT AUTHORITY
6730 RINGGOLD RD
CHATTANOOGA, TN 37412-4230

THANK YOU FOR BEING OUR CUSTOMER

Important Account Messages

- Want to get to know us better? Visit www.tennesseeamwater.com to learn more about the services we provide.
- Thank you for being a long time customer! We work hard every day to deliver water service that is safe, reliable, and affordable -- our customers deserve nothing less.

For more information, visit www.tennesseeamwater.com

Statement

Account No. **1026-210015560233**


Total Amount Due:	\$15,070.65
Payment Due By:	September 2, 2022


Billing Date: August 11, 2022
Service Period: Jul 08 to Aug 04 (28 Days)
Total Gallons: 7,867,900


Account Summary – See page 3 for Account Detail

Prior Billing:	\$16,762.21
Payments - Thank You!	= \$16,762.21
Balance Forward:	= \$0.00
Service Related Charges:	+ \$15,070.65
Total Amount Due:	= \$15,070.65

 **View your account information or pay your bill anytime at:** www.amwater.com/MyAccount

 **Pay by Phone*:** Pay anytime at 1-855-748-6066
*A convenience fee may apply

 **Customer Service:** 1-866-736-6420
M-F 7:00am to 7:00pm – Emergencies 24/7

 **TENNESSEE AMERICAN WATER**
PO BOX 6029
CAROL STREAM, IL 60197-6029

▼ Please return bottom portion with your payment. DO NOT send cash. Retain upper portion for your records. ▼

Account No. **1026-210015560233**

Total Amount Due:	\$15,070.65
Payment Due By:	September 2, 2022

If paying after 9/2/22, pay this amount: \$15,824.18

Amount Enclosed \$



WE KEEP LIFE FLOWING™



P.O. BOX 91623
RANTOUL, IL 61866-8623

Service to: 6730 RINGGOLD RD
CHATTANOOGA, TN 37412-4230

CATOOSA UTILITY DISTRICT AUTHORITY
P.O. BOX 750
RINGGOLD, GA 30736-0750

TENNESSEE AMERICAN WATER
PO BOX 6029
CAROL STREAM, IL 60197-6029

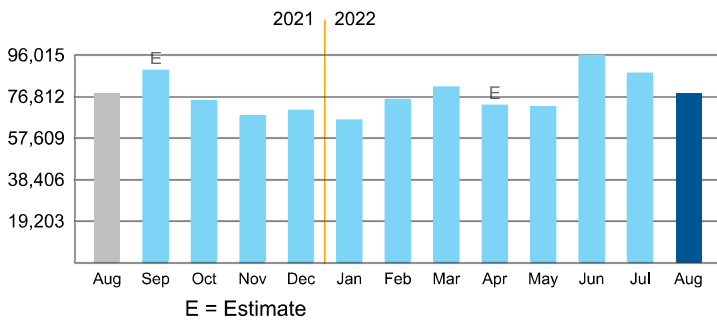
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Meter Reading and Usage Summary

Please see additional pages for meter reading details

Billed Usage History (graph shown in 100 gallons)

- 7,867,900 gallons = usage for this period
- 7,852,504 gallons = usage for same period last year



Next Scheduled Read Date: on or about September 07, 2022
Account Type: Sale for Resale

Average
daily use for
this period is:
(28 days)

280,996
gallons

Year to Date Billed Usage: 63,092,924 gallons

Account Detail

Account No. 1026-210015560233

Service To: 6730 RINGGOLD RD CHATTANOOGA, TN 37412-4230

Prior Billing 16,762.21

Payments -16,762.21

Total payments as of Aug 1. Thank you! -16,762.21

Balance Forward 0.00

Service Related Charges - 07/08/22 to 08/04/22

Water Service 12,782.18

Water Usage Charge
07/08/22 to 07/10/22 (8,429.89 x 1,369.52
\$0.16245989)
07/11/22 to 08/04/22 (70,249.11 x 11,412.66
\$0.16245989)

Other Charges 2,288.47

Expense Recovery Riders 64.37
Capital Recovery Riders 2,224.10

Total Service Related Charges 15,070.65

Total Current Period Charges 15,070.65

Total Amount Due



\$15,070.65

Understanding Your Bill

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For more information about your charges and rates, please visit:
<https://amwater.com/tnaw/rates>

Meter Reading and Usage Summary

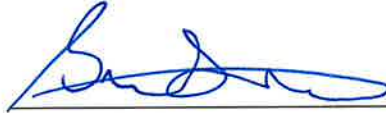
Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
72039997	100 gal	4"	07/08/2022	08/04/2022	15 (A)	15 (A)	0	0.00	0
72040001	100 gal	4"	07/08/2022	08/04/2022	15 (A)	15 (A)	0	0.00	0
76864058	100 gal	8"	07/08/2022	08/04/2022	6,608,227 (E)	6,685,615 (E)	77,388	77,388.00	7,738,800
76864059	100 gal	8"	07/08/2022	08/04/2022	3,976,752 (A)	3,978,043 (A)	1,291	1,291.00	129,100
A = Actual E = Estimate 1 Billing Unit = 100 gallons								Total Gallons:	7,867,900

STATE OF Tennessee)

COUNTY OF Hamilton)

BEFORE ME, the undersigned, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Grady Stout, being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of Tennessee-American Water Company before the Tennessee Public Utility Commission, and duly sworn, verifies that the data requests and discovery responses are accurate to the best of his knowledge.



Grady Stout

Sworn to and subscribed before me
this 26 day of August, 2022.

Kathryn Robinson
Notary Public

My Commission expires: 10/20/2024



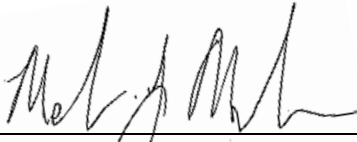
CERTIFICATE OF SERVICE

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

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This the 29th day of August 2022.



Melvin J. Malone