

BUTLER | SNOW

August 22, 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 22, 2022 at 3:56 p.m.

RE: *In Re: Petition of Tennessee-American Water Company Regarding the 2022 Investment and Related Expenses Under the Qualified Infrastructure Investment Program Rider, the Economic Development Investment Rider and the Safety and Environmental Compliance Rider*
TPUC Docket No. 22-00072

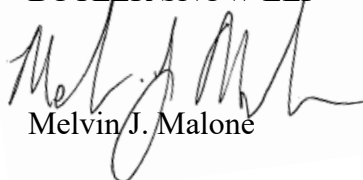
Dear Chairman Hilliard:

Attached for filing please find *Tennessee-American Water Company's Responses to First 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

Attachment

cc: Bob Lane, TAWC
Grady Stout, TAWC
Karen H. Stachowski, Consumer Advocate Unit
Vance Broemel, Consumer Advocate Unit

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BUTLER SNOW LLP

65300720.v1

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

IN RE:

**PETITION OF TENNESSEE-AMERICAN
WATER COMPANY REGARDING THE
2022 INVESTMENTS AND RELATED
EXPENSES UNDER THE QUALIFIED
INFRASTRUCTURE INVESTMENT
PROGRAM RIDER, THE ECONOMIC
DEVELOPMENT INVESTMENT RIDER
AND THE SAFETY AND
ENVIRONMENTAL COMPLIANCE
RIDER**

DOCKET NO. 22-00072

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

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Responses to the First Discovery Requests propounded by the Consumer Advocate Division in the Office of the Tennessee 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. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

- 1-1.** For capital expenditures incurred in 2022 that do not (and will not) qualify for recovery under the Company's capital expenditure rider, provide the estimated capital expenditures (a) incurred to date in 2022 and (b) budgeted to occur throughout the remainder of 2022. Identify each of the subparts of anticipated 2022 capital expenditures by project type or category.

RESPONSE:

1. As of July 31st the estimated capital spend incurred in 2022 that does not qualify for recovery under the Company's capital expenditure rider, is \$3,338,626, which does not include developer contributions or advances.
2. The remaining estimated spend for the remainder of 2022 that does not qualify for recovery under the Company's capital expenditure rider is \$2,240,334, which does not include developer contributions or advances.
3. The chart below identifies each of the subparts of anticipated 2022 capital expenditures that do not qualify for recover under the Company's capital expenditure rider by project type or category:

Project Type	Total 2022 Budget
Services and Laterals - New	\$ 2,389,472
Meters - New	\$ 141,973
ITS Equipment and Systems	\$ 1,760,097
Offices and Operations Centers	\$ 15,290
Vehicles	\$ 1,005,212
Tools and Equipment	\$ 172,938
Engineering Studies	\$ 93,978

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

1-2. Refer to the Direct Testimony of Gray Stout at 12:21–14:3 regarding the TAWC infrastructure that is between 50 and 100 years old. Also, refer to the Company’s Response to Consumer Advocate DR No. 1-5, in TPUC Docket No. 19-00105. Provide the requested information, as of December 31, 2021:

- a. Identify the miles of (i) Distribution Main, (ii) Transmission Main, and (iii) listing of other Distribution Infrastructure (specify) which are in excess of 50 years old but less than 75 years old.
- b. Identify the miles of (i) Distribution Main, (ii) Transmission Main, and (iii) listing of other Distribution Infrastructure (specify) which are in excess of 75 years old.
- c. Identify the miles of (i) Distribution Main, (ii) Transmission Main, and (iii) listing of other Distribution Infrastructure (specify) which are less than 50 years old.
- d. Identify the miles of (i) Distribution Main, (ii) Transmission Main, and (iii) Other Distribution Infrastructure (specify) in excess of 50 years old that have been replaced in (a) 2019, (b) 2020, (c) 2021, and (d) are forecast to be replaced in 2022 and included in this filing.

RESPONSE:

Category	A. In excess of 50 years old but less than 75 years old	B. In excess of 75 years old	C. Less than 50 years old	D. In excess of 50 years old and replaced between 2019-2021	E. In excess of 50 years old and planned to be replaced in 2022
i. Distribution Main (miles)	355.9	269.5	743.9	7.1	2.1
ii. Transmission Main (miles)	22.7	23.1	35.6	0.1	0
iii. Hydrants	298	1459	3995	72	19
iv. Valves	832	10922	8964	138	25

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

1-3. Identify the estimated (a) Cost of Transmission Mains and (b) Miles of Transmission Mains included in the 2022 forecasted plant contained in this filing. For purposes of this response, consider Transmission Mains to be 16-inch in diameter or greater—as the Company defined it in Response to Consumer Advocate DR No. 1-5 in TPUC Docket No. 19-00105.

RESPONSE:

The Company plans to install 2,700 linear feet (0.51 miles) of Transmission Main in 2022 for a forecasted cost of \$581,000.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

1-4. Identify the estimated (a) Cost of Distribution Mains, and (b) Miles of Distribution Mains included in the 2022 forecasted plant contained in this filing. For purposes of this response, consider Distribution Mains to be less than 16-inch in diameter.

RESPONSE:

The Company plans to install 19,335 linear feet (3.66 miles) of Distribution Main in 2022 for a forecasted cost of \$2,978,840.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

1-5. Identify the actual miles and costs of Transmission Main replaced by year for the period 2016–2021. For purposes of this response, include the removal costs of replaced pipe.

RESPONSE:

The Company has replaced 0.75 miles of Transmission Main from 2016-2021 for a total of \$3,600,439.73, which includes the removal costs of replaced pipe.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

1-6. Identify the actual miles and costs of Distribution lines replaced by year for the period 2016–2021. For purposes of this response, include the removal costs of replaced pipe.

RESPONSE:

The Company has replaced 20.14 miles of Distribution Main from 2016-2021 for a total of \$14,753,482.94, which includes the removal costs of replaced pipe.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

1-7. Refer to the Direct Testimony of Gray Stout at 27:18–28:4 regarding the description of the Dunlap Interconnect project. Mr. Stout testifies to a secondary benefit of extending service to residents in the area that were previously unserved. Identify the number of new customers that potentially may be served by the interconnect once it is completed.

RESPONSE:

The number of new customers that can be directly served is anticipated to be 20, but the project could facilitate future expansion.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Grady Stout

Question:

- 1-8.** Refer to the Direct Testimony of Gray Stout at 35:1–11 regarding the description of the Whitwell Raw Water Intake Improvement project. Respond to the following:
- a. Will this work be performed in part or in whole using contractors?
 - b. If so, was this project put out for bid to qualifying contractors?
 - c. Will the benefits of this project be exclusive to the Whitwell district? If not, describe the benefits of the project to other service territories of TAWC.
 - d. Provide a detailed breakdown of the budget for this project by component.
 - e. Given the size of cost of the project, were any alternatives considered that would derive similar benefits to the selected project?

RESPONSE:

- A. A majority of the work will be performed by contractors.
- B. Yes, this project was submitted to qualifying contractors for an opportunity to bid.
- C. No. The intake structural improvements will ensure the Whitwell district continues reliable service. There are several benefits to the project to other territories of TAW. For instance, the efficiencies added via variable frequency drives, remote controls, and more efficient pump motors will be shared among all of TAWC's customers.

D.

TAWC OH & PM	\$310,371.00
Design & permitting	\$310,000.00
Property Acquisition	\$60,000.00
Inspection	\$90,000.00
Construction	
Sitework	\$207,000.00
Pump Improvements	\$657,000.00
Access Improvements	\$910,000.00
Electrical Improvements	\$1,217,000.00
Structural and Safety Repairs	\$434,000.00
Survey and Testing	\$20,000.00

TOTAL: \$4,215,371.00

E. Yes, during the planning of this project alternatives were considered that would derive similar benefits. We examined additional sources of water for this area, including wells and purchased water. However, we determined those were not feasible. The major alternatives evaluated during the design phase within the project were access improvements as well as the actual location of the intakes. The final design incorporated the most cost-effective solutions to accomplish the intake improvements while ensuring continued service to the company's customers.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Robert Lane

Question:

1-9. Refer to the proposed balance of Cost of Removal less salvage for the Qualified Infrastructure Improvement Program. The average 2021 balance for this expenditure category was \$15,093,815 as included in TPUC Docket No. 22-00021. The balance included for 2021 in the last capital rider budget filing (TPUC Docket No. 20-00128) was \$11,620,911, while the current proposed balance in the present filing is \$18,054,675. Provide a comprehensive narrative explanation supporting this significant increase in the costs of removal less salvage between a) the 2021 budget filing and the reconciliation docket and b) the proposed 2022 balance and the 2021 actual balance for this category.

RESPONSE:

- a. The increase between the 2021 budget filing of \$11,620,911 and the 2021 reconciliation docket of \$15,093,815, is due to how the calculations were performed for both filings. For the budget filing (TPUC Docket No. 20-00128), the \$11,620,911 was based on the most recent data available at the time which included an Estimated 2020 and Estimated 2021 Cost of Removal less Salvage as part of the calculation to obtain the Average Cost of Removal less Salvage. In TPUC Docket No. 20-00128, the total Estimated 2020 QIIP amount totaled \$2,424,236 and the total Estimated 2021 QIIP amount totaled \$971,670. The Average Cost of Removal less Salvage calculated in TPUC Docket No. 20-00128 is

the sum of actual Cost of Removal less Salvage for 2014-2019, in addition to 100% of the Estimated 2020 amounts and 50% of the Estimated 2021 amounts. Please refer to the tab labeled WKP 2021 COR in the TAW_SCH1_2021_Filing.xls attachment as filed in TPUC Docket No. 20-00128.

For the 2021 reconciliation docket (TPUC Docket No. 22-00021), the \$15,093,815 is the result of using a 13-month average of the cumulative actuals through 2020 and 100% of actuals per month for 2021. Please refer to the tab labeled WKP 2021 COR Actual in the Petitioner's Exhibit – Capital Riders Reconciliation – TNS FINAL.xls attachment as filed in the TPUC Docket No. 22-00021.

When simply comparing the 2021 budget filing of \$11,620,911 and the 2021 reconciliation docket of \$15,093,815 by project line, there was an increase of \$3,472,904 of which 90% of the increase was primarily within the R - Capitalized Tank Rehabilitation/Painting project line, for 29%, and the I26-020039 - Repl Basin 2 & Plate Settlers project, for 61%.

For the R - Capitalized Tank Rehabilitation/Painting project line, there was no estimated 2020 and 2021 Cost of Removal less Salvage as filed in TPUC Docket No. 20-00128; however, 2020 Actual was \$961,105 and 2021 Actual was \$553,855 for a total of \$1,514,960. The \$1,514,960 actual Cost of Removal less Salvage activity factored into the 13-month average calculation in the 2021 reconciliation docket (TPUC Docket No. 22-00021) resulted in an increase of \$1,020,759 for the R project line Average Cost of Removal less Salvage.

For I26-020039 - Repl Basin 2 & Plate Settlers project, there was \$1,500,000 estimated 2020 and \$0 estimated 2021 Cost of Removal less Salvage as filed in TPUC Docket No.

20-00128; however, 2020 Actual was \$3,258,725 and 2021 Actual was \$438,338 for a total of \$3,697,063. The \$3,697,063 actual Cost of Removal less Salvage activity factored into the 13-month average calculation in the 2021 reconciliation docket (TPUC Docket No. 22-00021) resulted in an increase of \$2,121,529 for the I26-020039 project Average Cost of Removal less Salvage.

- b. The increase between the 2022 proposed balance of \$18,054,675 and the \$15,093,815 as included in TPUC Docket No. 22-00021 is due to how the calculations were performed for both filings. The current proposed balance in the present filing of \$18,054,675 is the sum of actual Cost of Removal less Salvage for 2014-2021, in addition to 50% of the Estimated 2022 amounts. Please refer to the tab labeled WKP 2022 COR in the TAW_SCH1_2022_Filing.xls attachment as filed in the TPUC Docket No. 22-00072. As stated in subpart a, the \$15,093,815 as filed in the 2021 reconciliation docket (TPUC Docket No. 22-00021) is the result of using a 13-month average of the cumulative actuals through 2020 and 100% of actuals per month for 2021.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Robert Lane

Question:

1-10. Provide the employee-benefit loading rate and actual nominal capitalized benefits applied to construction work in progress by year incorporated into capital expenditures for the period 2018 through 2021.

RESPONSE:

Please see DR 10_Attachment for the detail requested for 2018 through 2021.

Tennessee American Water Company
Docket No. 22-00072
Response to CAPD Data Request 1-010
Capitalization Ratios by Employee Benefit

Account	Account Description	2018 Amount	2018 Capitalization Rate	2019 Amount	2019 Capitalization Rate	2020 Amount	2020 Capitalization Rate	2021 Amount	2021 Capitalization Rate
50421000	401k Expense	\$199,863		\$217,882		\$216,603		\$235,431	
50421100	401k Expense Cap Credits	66,729		72,195		73,943		85,056	
	Total	<u>\$266,592</u>	25.03%	<u>\$290,077</u>	24.89%	<u>\$290,546</u>	25.45%	<u>\$320,487</u>	26.54%
50422000	Defined Compensation Plan Expense	\$289,433		\$311,276		\$327,339		\$327,914	
50422100	Defined Comp Plan Exp Cap Credits	96,426		99,130		100,909		109,864	
	Total	<u>\$385,859</u>	24.99%	<u>\$410,406</u>	24.15%	<u>\$428,249</u>	23.56%	<u>\$437,779</u>	25.10%
50426000	Retiree Medical Expense	\$28,725		\$29,554		\$31,169		\$29,368	
50426100	Retiree Medical Expense Cap Credits	7,345		11,162		8,219		9,748	
	Total	<u>\$36,069</u>	20.36%	<u>\$40,716</u>	27.41%	<u>\$39,388</u>	20.87%	<u>\$39,116</u>	24.92%
50510000	PBOP Expense	\$177,691		\$59,258		\$66,207		\$73,872	
50510100	PBOP Capitalized Credits	87,628		26,931		40,406		26,252	
	Total	<u>\$265,318</u>	33.03%	<u>\$86,189</u>	31.25%	<u>\$106,613</u>	37.90%	<u>\$100,124</u>	26.22%
50550000	Group Insurance Expense	\$1,533,550		\$1,692,711		\$1,700,373		\$1,736,099	
50560000	Health Savings Account Expense	2,148		8,869		6,614		5,452	
50550100	Group Insurance Capitalized Credits	509,220		545,597		557,743		636,453	
	Total	<u>\$2,044,917</u>	24.90%	<u>\$2,247,178</u>	24.28%	<u>\$2,264,730</u>	24.63%	<u>\$2,378,004</u>	26.76%
50610000	Pension Expense	\$123,359		\$122,436		\$186,252		\$217,824	
50610100	Pension Capitalized Credits	87,366		64,606		61,481		78,840	
	Total	<u>\$210,725</u>	41.46%	<u>\$187,042</u>	34.54%	<u>\$247,733</u>	24.82%	<u>\$296,664</u>	26.58%
68532000	FUTA	\$4,923		\$5,007		\$4,941		\$4,834	
68532100	FUTA Cap Credits	1,480		1,464		1,378		1,425	
	Total	<u>\$6,403</u>	23.11%	<u>\$6,470</u>	22.62%	<u>\$6,319</u>	21.81%	<u>\$6,258</u>	22.76%
68533000	FICA	\$561,711		\$616,989		\$614,081		\$631,111	
68533100	FICA Cap Credits	184,630		194,878		187,420		215,323	
	Total	<u>\$746,341</u>	24.74%	<u>\$811,867</u>	24.00%	<u>\$801,501</u>	23.38%	<u>\$846,435</u>	25.44%
68535000	SUTA	\$2,454		\$2,100		\$2,065		\$2,006	
68535100	SUTA Cap Credits	743		599		575		550	
	Total	<u>\$3,197</u>	23.25%	<u>\$2,700</u>	22.21%	<u>\$2,640</u>	21.78%	<u>\$2,556</u>	21.52%

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 22-00072
FIRST SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Responsible Witness: Robert Lane

Question:

1-11. Provide a reconciliation of the actual 2022 employee-benefit loading rate by benefit type included in the forecasted 2022 qualifying expenditures, including the calculation supporting the calculated rate. Further, provide the nominal amount of capitalized employee-benefit costs included in this filing.

RESPONSE:

Please see DR 11_Attachment for the detail requested through actual year-to-date May 2022.

Tennessee American Water Company
Docket No. 22-00072
Response to CAPD Data Request 1-011
Capitalization Ratios by Employee Benefit

Account	Account Description	Actual YTD May 2022 Amount	2022 Capitalization Rate
50421000	401k Expense	\$97,319	
50421100	401k Expense Cap Credits	37,059	
	Total	<u>\$134,378</u>	27.58%
50422000	Defined Compensation Plan Expense	\$131,346	
50422100	Defined Comp Plan Exp Cap Credits	45,964	
	Total	<u>\$177,309</u>	25.92%
50426000	Retiree Medical Expense	\$10,188	
50426100	Retiree Medical Expense Cap Credits	3,617	
	Total	<u>\$13,805</u>	26.20%
50510000	PBOP Expense	\$37,014	
50510100	PBOP Capitalized Credits	12,672	
	Total	<u>\$49,686</u>	25.50%
50550000	Group Insurance Expense	\$744,669	
50560000	Health Savings Account Expense	6,657	
50550100	Group Insurance Capitalized Credits	283,997	
	Total	<u>\$1,035,323</u>	27.43%
50610000	Pension Expense	\$102,250	
50610100	Pension Capitalized Credits	36,712	
	Total	<u>\$138,962</u>	26.42%
68532000	FUTA	\$4,492	
68532100	FUTA Cap Credits	1,417	
	Total	<u>\$5,909</u>	23.98%
68533000	FICA	\$251,053	
68533100	FICA Cap Credits	96,999	
	Total	<u>\$348,052</u>	27.87%
68535000	SUTA	\$1,273	
68535100	SUTA Cap Credits	400	
	Total	<u>\$1,673</u>	23.89%

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 22 day of Aug, 2022.


Notary Public

My Commission expires: 10/20/2024



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 Robert C. Lane, 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.



Robert C. Lane

Sworn to and subscribed before me
this 22 day of August, 2022.

Kathryn Robinson
Notary Public

My Commission expires: 10/20/2024



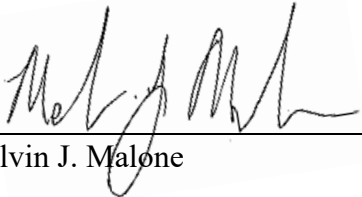
CERTIFICATE OF SERVICE

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

Vance L. Broemel, Esq.
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Vance.Broemel@ag.tn.gov

Karen H. Stachowski, Esq.
Senior Assistant Attorney General
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Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Karen.Stachowski@ag.tn.gov

This the 22nd day of August 2022.



Melvin J. Malone