

September 7, 2022

Electronically Filed in TPUC Docket
Room on September 7, 2022 at 7:47 a.m.

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

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*

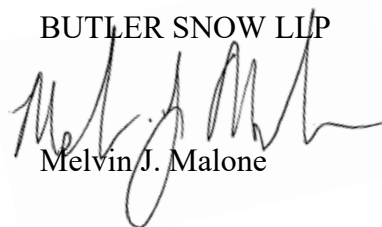
Dear Chairman Hilliard:

Attached for filing please find *Tennessee-American Water Company's Supplemental 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

Attachments

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

**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 SUPPLEMENTAL RESPONSES
TO FIRST DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Supplemental 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:

1-5. 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.

Supplemental Response:

The Company has replaced 0.51 miles of Transmission Main from 2016-2021 for a total of \$4,015,141.19, which includes the removal costs of replaced pipe.

Year	Miles	Cost
2016	0.31	\$ 804,715.06
2017	0	\$ -
2018	0	\$ -
2019	0.03	\$ 484,708.92
2020	0	\$ -
2021	0.17	\$ 2,725,717.21
Total	0.51	\$ 4,015,141.19

**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.

Supplemental 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.

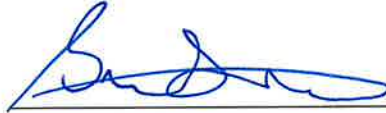
Year	Miles	Cost
2016	3.8	\$ 920,665.37
2017	3.8	\$ 2,858,966.46
2018	2.59	\$ 2,257,910.72
2019	2.43	\$ 1,639,014.14
2020	3.23	\$ 2,980,210.93
2021	4.29	\$ 4,096,715.32
Total	20.14	\$ 14,753,482.94

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



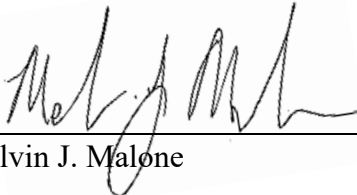
CERTIFICATE OF SERVICE

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

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
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Karen.Stachowski@ag.tn.gov

This the 7th day of September 2022.



Melvin J. Malone