

February 17, 2023

VIA ELECTRONIC FILING

**Electronically Filed in TPUC Docket Room
on February 17, 2023 at 10:06 a.m.**

Hon. Herbert H. 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 2023
Production Costs and Other Pass-Throughs Rider, TPUC Docket No. 23-00007***

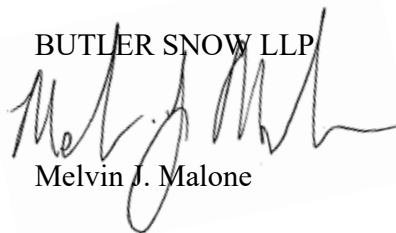
Dear Chairman Hilliard:

Attached for filing please find *Tennessee-American Water Company's Responses to First Discovery Requests of the Consumer Advocate* in the above-captioned matter. Please note that Attachment 2 and Attachment 3 to Response No. 3 of the Discovery Requests are being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of Attachment 2 and Attachment 3 to Response for DR No. 3 are attached.

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
Karen Stachowski, Consumer Advocate Division
Vance Broemel, Consumer Advocate Division

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

**PETITION OF TENNESSEE-)
AMERICAN WATER COMPANY)
REGARDING THE 2023 PRODUCTION)
COSTS AND OTHER PASS-)
THROUGHS RIDER)**

DOCKET NO. 23-00007

**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 of the Attorney General’s Office (“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. 23-00007
FIRST DISCOVERY REQUESTS OF THE
CONSUMER ADVOCATE DIVISION**

Witness: Grady Stout and Doug Wagner

1. Refer to <Workpaper_Usage – 2022.xlsx> filed with the Company’s Petition and the water main break in June 2022, which was reported in the local news.¹ Provide answers to the following:

- a. Confirm that the Company experienced a water main break in June 2022. If confirmed, provide the Company’s analysis detailing the cause of the main break.
- b. Does the main in question transport treated water sourced from the Company’s own treatment operations, purchased from suppliers, or a combination of both?
- c. Confirm that treated water was lost during this incident. If confirmed, provide how much, or an estimate of, treated water that was lost. If not confirmed, provide an explanation of how treated water was not lost during the incident.
- d. Do the numbers presented within this file make any adjustments for this incident regards to “System Delivery”?
 - i. If yes, provide a detailed description of the adjustment along with a supporting calculation documentation the adjustment.
 - ii. If no, provide a comprehensive response detailing how the June main break did not cause a material difference in water delivery.
- e. Do the numbers presented within this file make any adjustment for this incident with regards to “Water Sales”?

Response:

- a. Yes, the Company experienced a water main break in June 2022. On June 8, 2022, at approximately 4:45 a.m., a 12-cast iron main broke around 1300 Carter St, Chattanooga, TN. This 12-inch main was repaired approximately 8 hours later at 1:00 p.m. on the same day, June 8th, 2022.
 - b. The main in question transports treated water sourced from Tennessee American’s own operations.
 - c. Yes, treated water was lost during this indent in June of 2022. The approximate amount of treated water lost is 84,585 gallons. The company estimates this answer by using a water loss calculation formula from the Missouri Rural Water Association, which
-

factors in the type of break, size of break, and water pressure to create a water loss estimate for a main break.

- d. (ii) No, the numbers presented within this file do not make any adjustments for this incident in regards to system delivery. The June 8, 2022, main break at approximately 1300 Carter Street only lasted for approximately 8 hours. The Company experienced an interruption of service while repairs were made to the 12-inch main. This main break did not cause a material difference in water delivery. System delivery numbers are based on the daily delivery from the water treatment facilities and take into account our nonrevenue water percentages. Main break water loss is a factor calculated to determine the nonrevenue water percentage. This specific main break at 1300 Carter Street, did not make a material difference to our system delivery numbers, however it was accounted for in our nonrevenue water percentage for the month of June.
- e. No, the numbers presented within this file do not make any adjustments for this incident with regards to Water Sales. No, the June 8, 2022, main break at approximately 1300 Carter Street was repaired within 8 hours and service was restored to our customers. Water sales are measured by water meters for the water that reaches the customer. Therefore, no adjustments were necessary.

**TENNESSEE-AMERICAN WATER COMPANY
DOCKET NO. 23-00007
FIRST DISCOVERY REQUESTS OF THE
CONSUMER ADVOCATE DIVISION**

Witness: Doug Wagner and Grady Stout

2. Refer to <Workpaper_Usage – 2022.xlsx> filed with the Company’s Petition. As shown in Table 1, the Consumer Advocate notes that the Company’s water sales were especially volatile for the period covering June – September 2022.

Table 1				
Period	System Delivery	Water Sales	Delta	Non Revenue Water
Jun-22	1,181,185	865,739	315,445	27%
Jul-22	1,210,113	1,093,340	116,773	10%
Aug-22	1,173,374	751,684	421,690	36%
Sep-22	1,116,540	956,390	160,150	14%

Provide answers to the following:

- a. Has the Company determined the cause(s) of the large spike in non-revenue water incurred during August?
 - i. If yes, provide the causes(s) of the increase along with the Company’s actions to remediate the causes(s) and all supporting documentation; and
 - ii. If no, provide the Company’s rationale for not exploring the large increase in non-revenue water incurred during this period.

Response:

- a. (i) The Company established that most of the non-revenue water “spike” in August, 2022 was attributed to how the usage in July was billed. The billing in the four months depicted above may appear to show “spikes,” but the timing of when bills issue may result in shorter and longer periods of non-revenue water. Annual measurements are more accurate and reconciling the two months - the 10% in July and the 36% in August – reveals a more consistent 23% non-revenue water number for each month.

TENNESSEE-AMERICAN WATER COMPANY
DOCKET NO. 23-00007
FIRST DISCOVERY REQUESTS OF THE
CONSUMER ADVOCATE DIVISION

Witness: Grady Stout

3. Refer to Bob Lane's Testimony at page 16, lines 10-14, <Workpaper_Chemicals - 2022.xlsx>, Tab "Monthly Totals", and news that the "water sector is grappling with staff shortages and clogged supply chains."¹ Provide answers to the following:
- a. Has the Company studied the use of other water treatments without the use of Sodium Hypochlorite?
 - i. If yes, what were the results? Also, provide supporting documentation for your response.
 - ii. If no, provide the Company's mitigation plan if future supply chain issues worsen? Also, provide supporting documentation for your response.
 - b. Does the Company have any plans to mitigate the impacts of the predicted increase in Sodium Hypochlorite?
 - i. If yes, please provide a discussion of them. Also, provide supporting documentation for your response.

Response:

- a. (i) Yes, please see Attachment 1, Confidential and Proprietary Attachment 2, which is being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**, and Confidential and Proprietary Attachment 3, which is also being submitted **UNDER SEAL** as **CONFIDENTIAL INFORMATION**, for TAW's response to DR 3. The Company decided to switch to a safer chemical alternative and to phase out the use of gaseous chlorine and other compressed toxic gases at all of its regulated utility treatment facilities to reduce the risk that these chemicals pose to workers, the public, and the environment. The evaluation concluded that eliminating chlorine and other compressed toxic gases would significantly improve safety for our workers, the public, and the environment
 - b. (i) Assuming, but not conceding, an increase in Sodium Hypochlorite, TAW would always try to mitigate cost impacts on supplies. Tennessee American, as subsidiary of a larger company, leverages the buying power of American Water to utilize our corporate contracts for discounted pricing and timely delivery of chemicals. Tennessee American, further, utilizes local vendors to control costs and for delivery of the products. Two local suppliers,
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that are safety conscious, produce Sodium Hypochlorite on site, and deliver to us which mitigates our exposure to supply chain disruptions and provides competitive pricing.



**ADDRESSING SAFETY CONCERNS OF SODIUM HYPOCHLORITE
AS A REPLACEMENT FOR CHLORINE GAS
AT WATER AND WASTEWATER FACILITIES**

**SUPPLEMENT TO
AMERICAN WATER ENGINEERING'S DECEMBER 2015
RECOMMENDATIONS FOR REDUCING RISKS ASSOCIATED WITH RELEASE OF
TOXIC GASEOUS WATER TREATMENT CHEMICALS**

**AMERICAN WATER ENGINEERING
AUGUST 2022**

In 2016, American Water decided to phase out the use of gaseous chlorine and other compressed toxic gases at all of its regulated utility treatment facilities to reduce the risk that these chemicals pose to workers, the public, and the environment. Although infrequent, numerous accidental releases of toxic gases have occurred within the industry over the 100+ years that these chemicals have been employed for essential water and wastewater treatment purposes. Some releases have resulted in injuries and fatalities to workers, first responders, and the public, as well as damage to environmental ecosystems and critical infrastructure. It is also easy to imagine how injuries or outcomes from other release events could have been significantly worse if circumstances were different.

American Water's internal assessment considered that transitioning to alternative forms of chemicals would not eliminate all safety risks, and would actually create different safety risks that would need to be effectively managed. However, the evaluation concluded that eliminating chlorine and other compressed toxic gases would significantly improve safety for our workers, the public, and the environment. The decision affected approximately 200 existing gaseous chlorine, ammonia, and sulfur dioxide installations owned by American Water. To date, American Water has successfully eliminated compressed toxic gas use at several dozen water and wastewater treatment facilities and is on track to eliminate toxic gas use at its remaining installations by 2030.

American Water works closely with the US Environmental Protection Agency (USEPA), the American Water Works Association (AWWA), and other regulatory and industry organizations to maintain awareness of the latest guidance and best practices for maximizing safety for customers, workers, and the broader public. American Water's voluntary decision to switch to safer chemical alternatives was based on our interactions with such organizations, as well as the following pertinent publications:

1. ***Public Health Security and Bioterrorism Preparedness and Response Act***, PL 107-188, 2002. Referred to as the Bioterrorism Act, the Act amended the Safe Drinking Water Act and specified actions for Community Water Systems (CWSs) and the USEPA to improve the security of the Nation's drinking water infrastructure. Section 1433(b) required CWSs serving populations greater than 3,300 to either prepare or revise an Emergency Response Plan (ERP) that incorporates the results of its Vulnerability Assessment (VA), which were required assessments for critical infrastructure following the September 11th terrorist attacks to identify probable threats to providing a safe and reliable supply of drinking water and to mitigate public health concerns. The ERP must include "plans, procedures, and identification of equipment that can be implemented or utilized in the event of a terrorist or other intentional attack" on the CWS. The ERP must also include "actions, procedures, and identification of equipment which can obviate or significantly lessen the impact of terrorist attacks or other intentional actions on the public health and the safety and supply of drinking water provided to communities and individuals". The Act specifically identified intentional release of hazardous chemicals as a threat to be considered in action plan development.
2. ***Selecting Disinfectants in a Security-Conscious Environment***, AWWA; 2009. Presents an objective framework methodology for evaluating disinfection strategies on either an individual site or integrated enterprise-

wide basis. Identifies the most significant safety, security, and operational risks associated with various disinfection processes and forms of disinfectant chemicals.

3. ***Improving Chemical Facility Safety and Security***; Executive Order (EO) 13650; August 1, 2013. The EO mandated the creation of a Chemical Facility Safety and Security working group consisting of representatives from multiple federal agencies including the Department of Homeland Security (DHS), the USEPA, US Department of Transportation, and other key federal agencies for the purpose of improving chemical safety and security in coordination with owners and operators. A specific requirement of the working group was to convene stakeholders, including chemical critical infrastructure owners and operators, to identify and share best practices to reduce safety and security risks in the production and storage of potentially harmful chemicals, including through the use of safer alternatives.
4. ***Chemical Safety Alert: Safer Technology and Alternatives***; USEPA Publication 550-F-15-003; June 2015. This publication was issued in response to EO 13650 and was based on feedback from industry and other stakeholders. The document specifically identified sodium hypochlorite as an inherently safer alternative to chlorine gas.

American Water's evaluation of disinfection alternatives was based largely on the factors considered in AWWA's 2009 guidance manual and was also influenced by the information produced through EO 13650.

American Water recognizes and agrees that accidental mixing of bulk chemicals commonly used in water and wastewater treatment can result in violent chemical reactions that pose a risk to workers, the public, and the environment. Unique risks are associated with the potential for a chlorine gas release from concentrated sodium hypochlorite (bleach) solutions if they are accidentally (or intentionally) mixed with acidic chemicals commonly used in water treatment, including metal salt coagulants, fluosilicic acid (fluoride), and phosphoric acid.

- A chlorine gas release may occur if an acidic chemical is mistakenly (or intentionally) unloaded into a hypochlorite storage tank, or if a load of bleach is accidentally (or intentionally) loaded into an acidic chemical storage tank.
- American Water is aware of accidental mixing incidents that have occurred at water and wastewater treatment plants over the past two decades, including some that have resulted in toxic gas exposure injuries and one death to workers and the public.

However, the probability of a chlorine gas release from a gas system is significantly higher than from an aqueous (hypochlorite) system because gas systems always have gas present under pressure. Other factors that were considered in American Water's evaluation included the following:

1. Chlorine gas is recognized as an extraordinarily hazardous substance in several regulations:

- a. DHS's Chemical Facility Anti-Terrorism Standards (CFATS) identifies chlorine gas to be a release hazard at a threshold quantity of 2500 pounds, and a theft risk at a threshold quantity of 500 pounds, although American Water and municipal water and wastewater facilities are currently exempt from CFATS.
 - b. USEPA requires Risk Management Plans (RMP) to be prepared for chlorine gas with a threshold of 2500 pounds. The RMP Rule implements Section 112(r) of the 1990 Clean Air Act amendments. Each facility's program should address three areas:
 - i. Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases.
 - ii. Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures.
 - iii. Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g., the fire department) should an accident occur.
 - c. OSHA has requirements for Process Safety Management (PSM) to be implemented at locations with at least 1500 pounds of chlorine. There are 14 elements that must be implemented in such a program, and compliance audits are to be performed at least every three years.
 - d. Some individual states have additional requirements for facilities that store and utilize gaseous chlorine. For example, New Jersey has the Toxic Catastrophe Prevention Act (TCPA) that applies to facilities with a minimum of 1000 pounds of chlorine onsite. Regulatory requirements are comprehensive and compliance with the plans is subject to audits.
2. American Water complies with all regulations. Maintaining compliance with the myriad of important requirements set forth in the above regulations is challenging.
3. The water and wastewater exemption from the CFATS remains a topic of much discussion and may be withdrawn in the future. If the exemption is withdrawn, it would potentially require American Water to meet risk-based performance standards as defined by CFATS which could be a significantly onerous relative to current regulatory requirements.
4. The threat from terrorists and sabotage, including "inside" actors, can have a major impact on the prudent storage and use of chlorine gas. The threat from terrorism is also greater as it extends to theft with malintent during transit and storage.
5. American Water has extensive experience with handling, storing and feeding compressed toxic gases, and currently has more than 100 chlorine, ammonia,

and sulfur dioxide gas facilities in operation. Despite this experience, chlorine and ammonia gas releases have occurred from American Water installations over the years.

6. American Water has implemented automatic shut-off valves in many facilities and has installed dozens of emergency scrubbers. These devices are helpful but are not fool proof in preventing releases since mechanical devices can and do fail. In addition, emergency scrubbers are typically sized for a single container/cylinder, even at sites with multiple containers/cylinders in storage, and scrubbers can be readily defeated by a terrorist.
7. To a large extent, the substitution of sodium hypochlorite for chlorine gas minimizes the threat of intentional chlorine release incidents. Sodium hypochlorite has not been identified as chemical of interest by the Department of Homeland Security.

American Water has many decades of experience with receiving, storing, and feeding hazardous liquid chemicals in hundreds of water and wastewater treatment facilities. As a result, American Water has developed robust engineering design guidelines that integrates numerous features and practices for maximizing safety and minimize risks posed by liquid chemical feed systems. American Water's liquid chemical storage and feed guidelines equal, and in several important areas surpasses, the minimum design standards established by state regulatory agencies, including the Ten States Standards. In addition, American Water adheres to standard practices for chemical delivery operations that help minimize the risk of accidental mixing of chemicals, which applies to many of the strongly acidic and basic chemicals commonly used in water and wastewater treatment – not just sodium hypochlorite. Lastly, American Water's Safety Near Miss and Environmental Near Miss Programs are a very effective tool for sharing knowledge learned from avoided accidents, along with identifying tools and techniques that can help avert future accidents.

American Water concluded that the above guidelines and practices make the risk of a chlorine gas release from liquid sodium hypochlorite storage facilities a significantly lower probability than from gaseous storage facilities.

PUBLIC VERSION

**TENNESSEE-AMERICAN WATER COMPANY
DOCKET NO. 23-00007
FIRST DISCOVERY REQUESTS OF THE
CONSUMER ADVOCATE DIVISION**

TAW_CA_DR3_ATTACHMENT_2

PUBLIC VERSION

**TENNESSEE-AMERICAN WATER COMPANY
DOCKET NO. 23-00007
FIRST DISCOVERY REQUESTS OF THE
CONSUMER ADVOCATE DIVISION**

TAW_CA_DR3_ATTACHMENT_3

TENNESSEE-AMERICAN WATER COMPANY
DOCKET NO. 23-00007
FIRST DISCOVERY REQUESTS OF THE
CONSUMER ADVOCATE DIVISION

Witness: Robert Lane

4. Refer to <Workpaper_Purchased Water - 2022.xlsx> as filed with the Company's Petition.

Specifically, refer to Tab "Marion Board of Water." Provide a copy of the bills for these services for June through October 2022.

Response:

See TAW-CA-DR 4_Attachment for Marion Board of Water service bills for June through October 2022.

The portion of the system served by purchased water from Marion Gas Systems & Board of Water Works and Sewers has experienced recent customer growth, and during warmer months, sees increased lawn irrigation usage. TAW-CA-DR-4_Attachment documents that growth and seasonal usage.

700852237 220725 6 012



Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048
423-837-7164

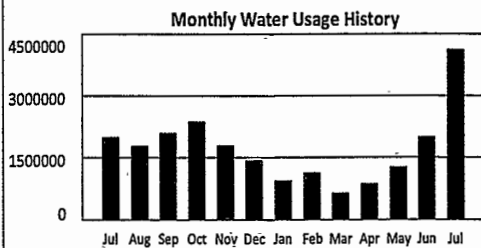
ACCOUNT NUMBER	NAME			SERVICE ADDRESS	
6005950.00 97	TN AMERICAN WATER			Timber Ridge Dr	
PREVIOUS BALANCE	DAYS	FROM DATE	TO DATE	DUE DATE	BILLING DATE
\$0.00	33	06/02/2022	07/05/2022	08/04/2022	07/20/2022
SERVICE	PREVIOUS READING	PRESENT READING	CONSUMPTION	CHARGES	
WA Kimball	75445	76205	76000	\$0.00	
WA Kimball	679136	719652	4051600	\$15,804.68	

**TURN BILL OVER
FOR OTHER IMPORTANT
INFORMATION**

All current balances must be received by the due date. If your current bill is not paid by the due date, then late fees will apply and your service may be subject to disconnection.

IF THIS STATEMENT INCLUDES A PREVIOUS UNPAID BALANCE, YOUR SERVICE IS SUBJECT TO DISCONNECTION.

PREVIOUS BALANCE	\$0.00
TOTAL AMOUNT DUE	\$15,804.68
DUE DATE	08/04/2022
BILL IS DELINQUENT AFTER DUE DATE	
Monthly Bank Draft Available	
Visit our website www.southpittsburgutilities.com	



PLEASE BRING ENTIRE BILL IF PAYING IN PERSON

PLEASE DETACH AND RETURN BOTTOM PORTION IF PAYING BY MAIL



Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048



ACCOUNT NUMBER	6005950.00 97
SERVICE ADDRESS	Timber Ridge Dr
BILLING DATE	07/20/2022
NET DUE	\$15,804.68
AMOUNT DUE AFTER 08/04/2022	\$17,385.15
AMOUNT PAID	

Monthly Bank Draft Available

Make Checks Payable To:



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85 1 MB 0.515
##-0001-##-85-65-65-85 - RG



TN AMERICAN WATER
C/O ENGIE INSIGHT- MS 4437
PO BOX 2440
SPOKANE WA 99210-2440

MARION GAS SYSTEMS &
BOARD OF WATER WORKS & SEWERS
PO BOX 408
SOUTH PITTSBURG TN 37380-0048



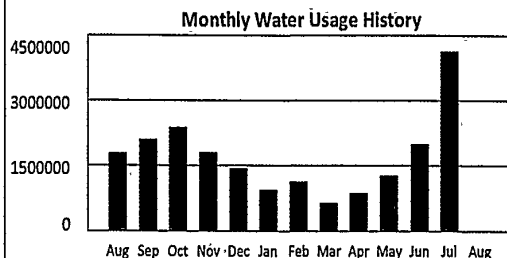


Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048
423-837-7164

ACCOUNT NUMBER	NAME			SERVICE ADDRESS	
6005950.00 97	TN AMERICAN WATER			Timber Ridge Dr	
PREVIOUS BALANCE	DAYS	FROM DATE	TO DATE	DUE DATE	BILLING DATE
\$0.00	28	07/05/2022	08/02/2022	09/04/2022	08/20/2022
SERVICE	PREVIOUS READING		PRESENT READING	CONSUMPTION	CHARGES
WA Kimball	1		1844	184300	\$0.00
WA Kimball	1035750		1061480	2573000	\$10,890.45

TURN BILL OVER FOR OTHER IMPORTANT INFORMATION All current balances must be received by the due date. If your current bill is not paid by the due date, then late fees will apply and your service may be subject to disconnection. IF THIS STATEMENT INCLUDES A PREVIOUS UNPAID BALANCE, YOUR SERVICE IS SUBJECT TO DISCONNECTION.	PREVIOUS BALANCE	\$0.00
	TOTAL AMOUNT DUE	\$10,890.45
	DUE DATE	09/04/2022
	BILL IS DELINQUENT AFTER DUE DATE	
	Monthly Bank Draft Available	
	Visit our website www.southpittsburgutilities.com	



PLEASE BRING ENTIRE BILL IF PAYING IN PERSON

PLEASE DETACH AND RETURN BOTTOM PORTION IF PAYING BY MAIL



Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048



T1 P1 *****AUTO**MIXED AADC 275

81 1 MB 0.515

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TN AMERICAN WATER
C/O ENGIE INSIGHT- MS 4437
PO BOX 2440
SPOKANE WA 99210-2440

ACCOUNT NUMBER	6005950.00 97
SERVICE ADDRESS	Timber Ridge Dr
BILLING DATE	08/20/2022
NET DUE	\$10,890.45
AMOUNT DUE AFTER 09/04/2022	\$11,979.50
AMOUNT PAID	

Monthly Bank Draft Available

Make Checks Payable To:

MARION GAS SYSTEMS &
BOARD OF WATER WORKS & SEWERS
PO BOX 408
SOUTH PITTSBURG TN 37380-0048





Marion Gas Systems &
Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048
423-837-7164

ACCOUNT NUMBER	NAME			SERVICE ADDRESS	
6005950.00 97	TN AMERICAN WATER			Timber Ridge Dr	
PREVIOUS BALANCE	DAYS	FROM DATE	TO DATE	DUE DATE	BILLING DATE
\$0.00	31	08/02/2022	09/02/2022	10/04/2022	09/20/2022
SERVICE	PREVIOUS READING		PRESENT READING	CONSUMPTION	CHARGES
WA Kimball	1061480		1087200	2572000	\$9,951.30
WA Kimball	1844		2077	23300	\$0.00

TURN BILL OVER
FOR OTHER IMPORTANT
INFORMATION

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IF THIS STATEMENT INCLUDES A
PREVIOUS UNPAID BALANCE, YOUR
SERVICE IS SUBJECT TO DISCONNECTION.

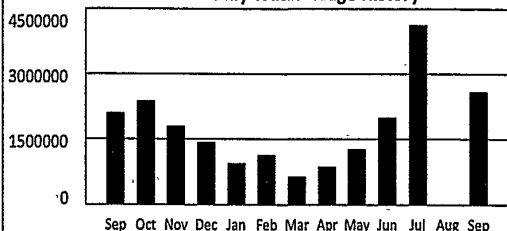
PREVIOUS BALANCE	\$0.00
TOTAL AMOUNT DUE	\$9,951.30
DUE DATE	10/04/2022

BILL IS DELINQUENT AFTER DUE DATE

Monthly Bank Draft Available

Visit our website
www.southpittsburgutilities.com

Monthly Water Usage History



As Natural Gas Prices continue to rise keep in mind we do offer an equal payment plan.

PLEASE BRING ENTIRE BILL IF PAYING IN PERSON

PLEASE DETACH AND RETURN BOTTOM PORTION IF PAYING BY MAIL



Marion Gas Systems &
Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048



T1 P1 *****AUTO**MIXED AADC 275

83 1 MB 0.515

##-0001-##-83-64-64-83 - RG

TN AMERICAN WATER
C/O ENGIE INSIGHT- MS 4437
PO BOX 2440
SPOKANE WA 99210-2440

ACCOUNT NUMBER	6005950.00 97
SERVICE ADDRESS	Timber Ridge Dr
BILLING DATE	09/20/2022
NET DUE	\$9,951.30
AMOUNT DUE AFTER 10/04/2022	\$10,946.43
AMOUNT PAID	

Monthly Bank Draft Available

Make Checks Payable To:

MARION GAS SYSTEMS &
BOARD OF WATER WORKS & SEWERS
PO BOX 408
SOUTH PITTSBURG TN 37380-0048



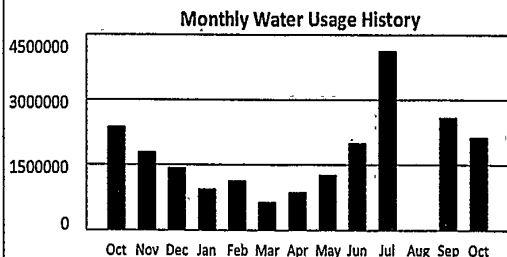


Marion Gas Systems & Board of Water Works & Sewers

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PREVIOUS BALANCE	DAYS	FROM DATE	TO DATE	DUE DATE	BILLING DATE
\$0.00	31	09/02/2022	10/03/2022	11/04/2022	10/20/2022
SERVICE	PREVIOUS READING	PRESENT READING	CONSUMPTION	CHARGES	
WA Kimball	2077	2291	21400	\$0.00	
WA Kimball	1087200	1108293	2109300	\$8,497.65	

TURN BILL OVER FOR OTHER IMPORTANT INFORMATION	PREVIOUS BALANCE	\$0.00
	TOTAL AMOUNT DUE	\$8,497.65
	DUE DATE	11/04/2022
	BILL IS DELINQUENT AFTER DUE DATE	
All current balances must be received by the due date. If your current bill is not paid by the due date, then late fees will apply and your service may be subject to disconnection.	Monthly Bank Draft Available	
	Visit our website www.southpittsburgutilities.com	
IF THIS STATEMENT INCLUDES A PREVIOUS UNPAID BALANCE, YOUR SERVICE IS SUBJECT TO DISCONNECTION.		



PLEASE BRING ENTIRE BILL IF PAYING IN PERSON

PLEASE DETACH AND RETURN BOTTOM PORTION IF PAYING BY MAIL



Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048



ACCOUNT NUMBER	6005950.00 97
SERVICE ADDRESS	Timber Ridge Dr
BILLING DATE	10/20/2022
NET DUE	\$8,497.65
AMOUNT DUE AFTER 11/04/2022	\$9,347.42
AMOUNT PAID	

Monthly Bank Draft Available

Make Checks Payable To:

MARION GAS SYSTEMS &
BOARD OF WATER WORKS & SEWERS
PO BOX 408
SOUTH PITTSBURG TN 37380-0048



T1 P1 *****AUTO**MIXED AADC 275

81 1 MB 0.515

##-0001-##-81-64-64-81 - RG

TN AMERICAN WATER
C/O ENGIE INSIGHT- MS 4437
PO BOX 2440
SPOKANE WA 99210-2440



700896232 221122 6 007

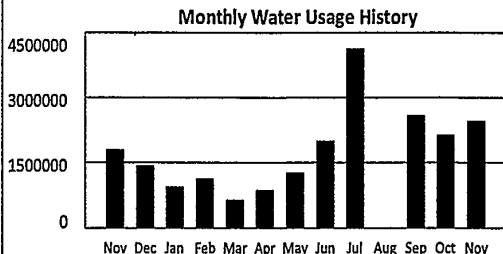


Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048
423-837-7164

ACCOUNT NUMBER	NAME			SERVICE ADDRESS	
6005950.00 97	TN AMERICAN WATER			Timber Ridge Dr	
PREVIOUS BALANCE	DAYS	FROM DATE	TO DATE	DUE DATE	BILLING DATE
\$0.00	31	10/03/2022	11/03/2022	12/04/2022	11/20/2022
SERVICE	PREVIOUS READING		PRESENT READING	CONSUMPTION	CHARGES
WA Kimball	2291		2566	27500	\$0.00
WA Kimball	1108293		1132687	2439400	\$9,832.36

<div>TURN BILL OVER FOR OTHER IMPORTANT INFORMATION</div> <div>All current balances must be received by the due date. If your current bill is not paid by the due date, then late fees will apply and your service may be subject to disconnection.</div> <div>IF THIS STATEMENT INCLUDES A PREVIOUS UNPAID BALANCE, YOUR SERVICE IS SUBJECT TO DISCONNECTION.</div>	PREVIOUS BALANCE	\$0.00
	TOTAL AMOUNT DUE	\$9,832.36
	DUE DATE	12/04/2022
	BILL IS DELINQUENT AFTER DUE DATE	
	Monthly Bank Draft Available	
	Visit our website www.southpittsburgutilities.com	



PLEASE BRING ENTIRE BILL IF PAYING IN PERSON

PLEASE DETACH AND RETURN BOTTOM PORTION IF PAYING BY MAIL



Marion Gas Systems & Board of Water Works & Sewers

POST OFFICE BOX 408
SOUTH PITTSBURG, TN 37380-0048



T1 P1 *****AUTO**MIXED AADC 275

79 1 MB 0.515

##-0001-##-79-64-64-79 - RG

TN AMERICAN WATER
C/O ENGIE INSIGHT- MS 4437
PO BOX 2440
SPOKANE WA 99210-2440

ACCOUNT NUMBER	6005950.00 97
SERVICE ADDRESS	Timber Ridge Dr
BILLING DATE	11/20/2022
NET DUE	\$9,832.36
AMOUNT DUE AFTER 12/04/2022	\$10,815.60
AMOUNT PAID	

Monthly Bank Draft Available

Make Checks Payable To:

MARION GAS SYSTEMS &
BOARD OF WATER WORKS & SEWERS
PO BOX 408
SOUTH PITTSBURG TN 37380-0048




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:

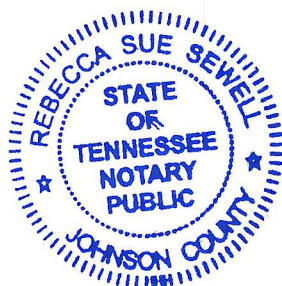
He is appearing as a witness on behalf of Tennessee-American Water Company before the Tennessee Public Utility Commission, and duly sworn, verifies that the data requests and discovery responses are accurate to the best of his knowledge.


Grady Stout

Sworn to and subscribed before me
this 16th day of February, 2023.

Rebecca Sewell
Notary Public

My Commission expires: November 26, 2023



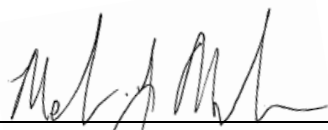
CERTIFICATE OF SERVICE

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 17th day of February 2023.



Melvin J. Malone