

STATE OF TENNESSEE

Office of the Attorney General



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March 30, 2023

Chairman Herbert H. Hilliard
c/o Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Re: ***Petition of Tennessee American Water Company Regarding the 2023
Production and Other Pass-Throughs Rider, TPUC Docket No. 23-00007***

Dear Chairman Hilliard:

Since the submission of Tennessee-American Water Company's ("TAWC") Petition in the above-referenced matter on January 17, 2023, TAWC and the Consumer Advocate Division in the Office of the Tennessee Attorney General ("Consumer Advocate") have been involved in cooperative discussions and have exchanged various information related to the Petition. With the recent submission of the Consumer Advocate's Testimony of Alex Bradley, the parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer. Tennessee American Water will not be filing rebuttal testimony.

Moreover, after considering the entire record, including TAWC's responses to discovery, and consistent with the streamlined approach contemplated in the alternative method riders approved in TPUC Docket No. 13-00130, it is the joint position of the parties that this matter is ripe for consideration on the merits by the Tennessee Public Utility Commission ("TPUC" or the "Commission"). At this time, there remain no outstanding disputes between the parties with respect to this Docket, as clarified by and through discovery, the parties' communications, and pre-filed testimony. As reflected in the Pre-filed Testimony of Robert C. Lane and the Pre-filed Testimony of Mr. Bradley, there are no contested issues between the parties on the merits of the Petition, and it is the position of the parties that this matter should be resolved in favor of the positions set forth in TAWC's Petition, consistent with the pre-filed testimony of the parties. Consistent with agency practice, the parties hereby jointly request that the entire official record in this docket, including discovery, be made a part of the evidentiary record.

With the foregoing in mind, unless otherwise requested by the Commission, the Parties hereby waive both opening statements, the live presentation of testimony, and cross-examination of witnesses by the Parties. TAWC Witness, Lane, and the Consumer Advocate Witness, Bradley, will be available for the Hearing on the merits. Further, other than follow-up and/or clarifying questions in response to questions of any witness by a TPUC Commissioner or TPUC Staff, TAWC waives cross-examination of Mr. Bradley, and the Consumer Advocate waives cross-examination of Mr. Lane.

As required, an original of this filing, along with four hard copies will follow. Should you have any questions concerning this filing, or additional information, please do not hesitate to contact me.

Respectfully,



Karen H. Stachowski
Senior Assistant Attorney General

cc: Monica Smith-Ashford, Esq.
Melvin Malone, Esq.
Robert C. Lane