

BUTLER | SNOW

October 24, 2023

Electronically Filed in TPUC Docket Room
On October 24, 2023 at 12:48 p.m.

VIA ELECTRONIC FILING

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: *Joint Petition of Tennessee-American Water Company and Catoosa Utility
District Authority for Approval of a Special Contract, Docket No. 23-00066***

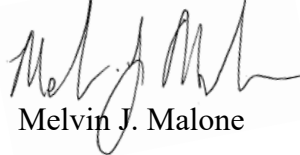
Dear Chairman Hilliard:

Attached for filing please find *Tennessee-American Water Company's Responses to Consumer Advocate's Second Discovery Requests* in the above-captioned docket.

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
Randall Crawford, CUDA
Karen H. Stachowski, Consumer Advocate Division
Shilina B. Brown, Consumer Advocate Division

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BUTLER SNOW LLP

83788848.v1

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

**JOINT PETITION OF TENNESSEE-
AMERICAN WATER COMPANY AND
CATOOSA UTILITY DISTRICT
AUTHORITY FOR APPROVAL OF A
SPECIAL CONTRACT**

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DOCKET NO. 23-00066

**TENNESSEE-AMERICAN WATER COMPANY’S RESPONSES
TO CONSUMER ADVOCATE’S SECOND DISCOVERY REQUESTS**

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Responses to the Second 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
CASE NO. 2023-00066
CONSUMER ADVOCATE’S SECOND DATA REQUESTS**

Witness: Grady Stout

2-1. Data Support. Refer to the spreadsheet included with the Company’s response to Consumer Advocate DR No. 1-2 regarding the anticipated monthly contract revenues. Specifically, note that the “Estimated Revenue Per Month Contract Rate” in Column E of this spreadsheet contains hard-coded amounts of \$12,589.81 that the Consumer Advocate is unable to precisely replicate.

As explained in Item #3 in the “Preliminary Matters and Definitions” of the Consumer Advocate’s First Informal Discovery Request regarding the format of responses, the Company is to provide:

“all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format **with all cells and formulas intact and in working order.**” [Emphasis added.]

Therefore, please update this spreadsheet to provide a valid formula that properly calculates the \$12,589.81 in “Estimated Revenue Per Month Contract Rate” shown in Column E of the spreadsheet included in this response.

RESPONSE: Please see TAW-CAD-Set 2 – DR001_ATTACHMENT. The difference between our original response and the attached response is rounding.

	Estimated Usage per month	Estimated Revenue Per Month	Contract Rate	Surcharges	Total Revenue
Aug-23	7750000		\$12,590.64	\$3,890.51	\$16,481.15
Sep-23	7750000		\$12,590.64	\$3,890.51	\$16,481.15
Oct-23	7750000		\$12,590.64	\$3,890.51	\$16,481.15
Nov-23	7750000		\$12,590.64	\$3,890.51	\$16,481.15
Dec-23	7750000		\$12,590.64	\$3,890.51	\$16,481.15
Jan-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Feb-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Mar-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Apr-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
May-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Jun-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Jul-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Aug-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Sep-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Oct-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Nov-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35
Dec-24	7750000		\$12,590.64	\$4,265.71	\$16,856.35

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Grady Stout

2-2. Data Support. Refer to the Company's response to Consumer Advocate DR No. 1-3 regarding the incremental capital and operating costs related to the Agreement between the

Parties and provide the following information:

- a. Provide the source and support for the \$3,642.50 incremental O&M expense referenced in this response in Excel format with all formulas intact.
- b. Provide the source and support for depreciation expense and the resulting accumulated depreciation balance related to assets devoted to providing service to CUDA in Excel format with all formulas intact.
- c. Provide the source and support for property taxes related to assets devoted to providing service to CUDA in Excel format with all formulas intact.

RESPONSE:

Please see attached spreadsheets for responses. After review the response to part a. changed the incremental O&M from \$3,642.50 to \$3,642.00. This was due to removing purchased water from production cost per 1000 gallons.

Estimated Usage Per Month	Production Cost Per 1000 Gallons	Incremental O&M
7,750,000	0.46	3565.00

Prodcution Cost per System Delivery	
Purchased Water	134,325
Fuel and Power	2,845,124
Chemicals	2,598,959
Waste Disposal	554,660
Total Production Cost	6,133,068
System Delivery	12,960,535
Cost per SD	\$ 0.47
Cost per SD w/o Purchased water	\$ 0.46

Month	Original Investment	Depreciation Rate	Depreciation Expense	End Reserve
Jul-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,184,178.98
Aug-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,182,211.45
Sep-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,180,243.91
Oct-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,178,276.38
Nov-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,176,308.85
Dec-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,174,341.32
Jan-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,172,373.79
Feb-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,170,406.26
Mar-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,168,438.72
Apr-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,166,471.19
May-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,164,503.66
Jun-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,162,536.13
Jul-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,160,568.60
Aug-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,158,601.06
Sep-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,156,633.53
Oct-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,154,666.00
Nov-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,152,698.47
Dec-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,150,730.94
Jan-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,148,763.40
Feb-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,146,795.87
Mar-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,144,828.34
Apr-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,142,860.81
May-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,140,893.28
Jun-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,138,925.75
Jul-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,136,958.21
Aug-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,134,990.68
Sep-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,133,023.15
Oct-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,131,055.62
Nov-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,129,088.09
Dec-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,127,120.55
Jan-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,125,153.02
Feb-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,123,185.49
Mar-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,121,217.96
Apr-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,119,250.43
May-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,117,282.89
Jun-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,115,315.36
Jul-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,113,347.83
Aug-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,111,380.30
Sep-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,109,412.77
Oct-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,107,445.24
Nov-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,105,477.70
Dec-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,103,510.17
Jan-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,101,542.64
Feb-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,099,575.11
Mar-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,097,607.58
Apr-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,095,640.04
May-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,093,672.51

Jun-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,091,704.98
Jul-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,089,737.45
Aug-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,087,769.92
Sep-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,085,802.39
Oct-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,083,834.85
Nov-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,081,867.32
Dec-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,079,899.79
Jan-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,077,932.26
Feb-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,075,964.73
Mar-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,073,997.19
Apr-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,072,029.66
May-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,070,062.13
Jun-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,068,094.60
Jul-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,066,127.07
Aug-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,064,159.53
Sep-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,062,192.00
Oct-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,060,224.47
Nov-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,058,256.94
Dec-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,056,289.41
Jan-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,054,321.88
Feb-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,052,354.34
Mar-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,050,386.81
Apr-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,048,419.28
May-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,046,451.75
Jun-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,044,484.22
Jul-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,042,516.68
Aug-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,040,549.15
Sep-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,038,581.62
Oct-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,036,614.09
Nov-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,034,646.56
Dec-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,032,679.02
Jan-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,030,711.49
Feb-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,028,743.96
Mar-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,026,776.43
Apr-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,024,808.90
May-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,022,841.37
Jun-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,020,873.83
Jul-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,018,906.30
Aug-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,016,938.77
Sep-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,014,971.24
Oct-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,013,003.71
Nov-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,011,036.17
Dec-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,009,068.64
Jan-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,007,101.11
Feb-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,005,133.58
Mar-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,003,166.05
Apr-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,001,198.52
May-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,999,230.98
Jun-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,997,263.45
Jul-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,995,295.92

Aug-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,993,328.39
Sep-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,991,360.86
Oct-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,989,393.32
Nov-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,987,425.79
Dec-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,985,458.26
Jan-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,983,490.73
Feb-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,981,523.20
Mar-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,979,555.66
Apr-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,977,588.13
May-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,975,620.60
Jun-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,973,653.07
Jul-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,971,685.54
Aug-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,969,718.01
Sep-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,967,750.47
Oct-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,965,782.94

*This Excel is an estimate based on equal asset distribution to the East Ridge Assessment and is annual amount.

2022 East Ridge Tax Bill	162,272
2022 East Ridge Assessment	4,653,222
Tax rate	0.035

Total Reported East Ridge					
	Cost Reported		Assessment	Tax	Rate
Meters	8,463,364	0.348	1,620,797	56,522	0.035
Mains	14,913,762	0.614	2,856,096	99,601	0.035
Hydrants	920,743	0.038	176,329	6,149	0.035
	24,297,869	1.000	4,653,222	162,272	0.035

For Transmission Main That serves CUDA

Cost Reported		Assement Rate	Assessment	Tax	Rate
\$	2,186,146.51	0.147	\$ 418,663.26	\$ 14,600.04	0.035

Tax % Breakdown			
Hamilton County Tax	0.64	\$	9,366.75
East Ridge Municipal Tax	0.36	\$	5,233.29

12/19/22, 1:20 PM

Hamilton County Trustee



Hamilton County Trustee
Property Tax Inquiry

Bill Mullander - Hamilton County Trustee
210 Courthouse @ 625 Georgia Ave.
Chattanooga, TN 37402
Phone: (423) 209-7270 Fax: (423) 209-7271
Office Hours: Mon - Fri 8:00am-4:00pm except these holidays

Hamilton County Tennessee

- Location as of 12/19/22
- Trustee Home
- Satellite Location Directions
- General Property Tax FAQs
- Current Property Tax Rates
- Email the Trustee
- Tax Roll File
- Delinquent File Download

Other Links

County Officials & Departments
Hamilton County Assessor
Hamilton County Register Of Deeds

Trustee - Tax Bill

Return to Property Details

GIS Printing Tips

State Grid	OSAP WS001600	Flags	None
District	East Ridge (ER)		
Property Address			
Bill Type	Office of State Assessed Property	Bill Year	2022
Status	Active	Bill #	173919
Mailing Address	TENNESSEE AMERICAN WATER COMPANY 1 WATER STREET P.O. BOX 2238 CAMDEN NJ, 08101	Assessment	\$4,653,222.00
Legal Desc	1. 2. 3. 4. Office of State Assessed Property		

Billing Information

Date	Transaction Type	Tax Type	Amount
12/16/2022	Tax Billing	County Tax	\$104,106.54
12/16/2022	Tax Billing	Municipal Tax	\$50,165.28

Total Due \$162,271.82

IF PAID BY 2/28/2023 U.S. POSTMARK ACCEPTED

Make Payment

MAKE CHECKS PAYABLE AND MAIL TO:

HAMILTON COUNTY TRUSTEE
625 Georgia Ave., Room 210
Chattanooga, TN 37402-1494

Tennessee American Water Company
Forms WS-7 - 8

	TN-City of Chattanooga	TN-Hamilton County-Outside Chattanooga	TN-Town of East Ridge
Total TN	15,086,170	81,314,354	1,613,354
Meters	172,873,921	138,360,661	14,613,382
Mains	12,552,688	10,613,250	89,243
Hydrants	263,171,154	215,188,265	3,942,075
Total Water Distribution System	14,120,628	12,725,140	27,635
Pump and Pump Equipment	18,552,811	10,614,072	737,015
Reservoirs and Stand Pipes	28,615,585	29,181,447	-
Purification and Filtration	617,318	463,717	3,894
Miscellaneous	62,795,742	69,714,376	168,541
Total Water Supply and Equipment	15,500,837	14,230,467	4,017
General Equipment	3,078,350	2,674,767	-
CWIP	3,427,438	3,267,948	-
Land	46,727,608	46,730,225	605,400
Structures	384,807,561	336,124,295	4,338,535
Total All Property/Tennesses	384,807,561	336,124,295	4,338,535

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Bob Lane

2-3. Data Support. Refer to the spreadsheet included with the Company's response to Consumer Advocate DR No. 1-4 regarding the difference between special contract rates and the existing tariff rates. Specifically note that the data included in Columns E, F and G of this spreadsheet contain hard-coded amounts that the Consumer Advocate is unable to precisely replicate.

As explained in Item #3 in the "Preliminary Matters and Definitions" of the Consumer Advocate's First Informal Discovery Request regarding the format of responses, the Company is to provide:

"all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format **with all cells and formulas intact and in working order.**" [Emphasis added.]

Therefore, please update this spreadsheet to provide valid formulas that properly calculate the referenced data.

RESPONSE:

Please see the attached spreadsheet in Excel format < TAW-CAD-Set 2 - DR003 and DR04>

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Bob Lane

2-4. Data Support. Refer to the spreadsheet included with the Company's response to Consumer Advocate DR No. 1-5 regarding the breakeven point between the special contract rates and the existing tariff rates. Specifically note that the data included in this spreadsheet contain hard-coded amounts that the Consumer Advocate is unable to precisely replicate.

As explained in Item #3 in the "Preliminary Matters and Definitions" of the Consumer Advocate's First Informal Discovery Request regarding the format of responses, the Company is to provide:

"all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format **with all cells and formulas intact and in working order.**" [Emphasis added.]

Therefore, please update this spreadsheet to provide valid formulas that properly calculate the referenced data.

RESPONSE:

Please see the attached spreadsheet in Excel format < TAW-CAD-Set 2 - DR003 and DR004>

CAD SET 2 - DR No 2-4

Workpaper in support of CAD Set -1 DR 04

Rates			
	Chattanooga Sale for Resale	Contract Price	
	2012 Tariff	2023	
0 - 4 CCF	4	0.2330	1.2152
4 - 65 CCF	65	3.6960	1.2152
65-500 CCF	500	2.3220	1.2152
500 - 5000 CCF	5000	1.7360	1.2152
5000 - 15000 CCF	10361	1.9600	1.2152
OVER 15000 CCF		0.7880	1.2152
Usage			
Gal/Year	93,000,000		
Gal/Month	7,750,000		
CCF per Month	10,361		

Revenues			
	Chattanooga Sale for Resale	Contract Price	Contract Price
	2012 Tariff	2013	2023
0 - 4 CCF	\$ 0.93	\$ 4.86	\$ 4.86
4 - 65 CCF	\$ 225.46	\$ 74.13	\$ 74.13
65-500 CCF	\$ 1,010.07	\$ 528.61	\$ 528.61
500 - 5000 CCF	\$ 7,812.00	\$ 5,468.40	\$ 5,468.40
5000 - 15000 CCF	\$ 10,507.56	\$ 6,514.69	\$ 6,514.69
OVER 15000 CCF			
Revenues	\$ 19,556.02	\$ 12,590.69	\$ 12,590.69
Surcharges			
Rider Surcharge	36.10%	0.00%	36.10%
TCJA	-4.55%	0.00%	-4.55%
Recon Adj	-2.78%	0.00%	-2.78%
PCOP	2.13%	0.00%	2.13%
Surcharge Revenue			
Rider Surcharge	\$ 7,059.72	\$ -	\$ 4,545.24
TCJA	\$ (889.80)	\$ -	\$ (572.88)
Recon Adj	\$ (543.66)	\$ -	\$ (350.02)
PCOP	\$ 416.54	\$ -	\$ 268.18
Total Surcharge Revenue	\$ 6,042.81	\$ -	\$ 3,890.52
Monthly Revenue	\$ 25,598.83	\$ 12,590.69	\$ 16,481.21
Annual Revenues	\$ 307,185.9	\$ 151,088.2	\$ 197,774.5

	Anticipated Usage (Gallon)	Anticipated Usage (CCF)	2013 Contract Revenues (No Surcharges in 2013)	2023 Contract Revenues W/Surcharges (1)	2023 Tariff Revenues W/Surcharges (2)
Annual	93,000,000	124332	\$ 151,088	\$ 197,775	\$ 307,186
	7,750,000	10361	\$ 12,591	\$ 16,481	\$ 25,599
(1) Contract has 93,000,000 Gallon (120321 CCF) Minimum Usage Requirement					
(2) Tariff does not have a Minimum Usage Requirement					

CAD SET 2 - DR No 2-4

Workpaper in support of CAD Set -1 DR 05

Revenues			
	Chattanooga	Contract Price	
	2012 Tariff	2023	
0 - 4 CCF	4	0.2330	1.2152
4 - 65 CCF	65	3.6960	1.2152
65-500 CCF	500	2.3220	1.2152
500 - 5000 CCF	5000	1.7360	1.2152
5000 - 15000 CCF	15000	1.9600	1.2152
OVER 15000 CCF	39392	0.7880	1.2152
Gal/Month	29,465,216		
CCF/Month	39,392		
Surcharges			
Rider Surcharge	36.10%	36.10%	
TCJA	-4.55%	-4.55%	
Recon Adj	-2.78%	-2.78%	
PCOP	2.13%	2.13%	
Surcharge Revenue			
Rider Surcharge	\$ 17,280.84	\$ 17,280.77	
TCJA	\$ (2,178.06)	\$ (2,178.05)	
Recon Adj	\$ (1,330.77)	\$ (1,330.76)	
PCOP	\$ 1,019.62	\$ 1,019.61	
Revenues	\$ 47,869.35	\$ 47,869.16	\$ 0.20
Surcharges			
Rider Surcharge	36.10%	36.10%	
TCJA	-4.55%	-4.55%	
Recon Adj	-2.78%	-2.78%	
PCOP	2.13%	2.13%	
Surcharge Revenue			
Rider Surcharge	\$ 17,280.84	\$ 17,280.77	
TCJA	\$ (2,178.06)	\$ (2,178.05)	
Recon Adj	\$ (1,330.77)	\$ (1,330.76)	
PCOP	\$ 1,019.62	\$ 1,019.61	

	Anticipated Usage (Gallon)	Monthly Usage (CCF)	Monthly Contract Revenues W/Surcharges	Monthly Tariff Revenues W/Surcharges	Difference
Monthly Usa	29,465,216	39392	\$ 62,660.98	\$ 62,660.73	\$ 0.26

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Grady Stout

2-5. Available Resources. Refer to the Company's response to Consumer Advocate DR No. 1-11(c) regarding whether or not the Company can provide water supply to CUDA under the terms of the Agreement without incurring any additional operating or capital costs that would need to be applied to TAWC's existing customers. The Company's response appears to indicate that incremental costs to provide service to CUDA would be necessary and that these costs would be recovered from all of TAWC's customer base. Please identify the anticipated costs to provide service to CUDA over the five-year term of the proposed Agreement that the Company believes would need to be charged to TAWC's other customers.

RESPONSE:

The Company will incur incremental operating costs of approximately \$0.46 per thousand gallons representing the additional production costs (chemicals, electric power and waste disposal associated with water provided to CUDA under this contract. These costs vary directly with the amount of water purchased by CUDA. These costs will be recovered from the revenue pursuant to the special contract with CUDA. Because CUDA is served off of TAWC's Chattanooga system, there are no purchased water costs associated with providing service to CUDA.

The Company does not expect to incur capital costs associated with incremental investment and to service CUDA. The Company's answer to Consumer Advocate DR No. 1-11(c) is addressing capital costs associated with investment made to TAWC's system as a whole regardless of whether water is provided to CUDA under a special contract. As such there are no additional capital costs needed to provide service to CUDA.

The additional annual O&M costs (\$42,780), combined with no additional capital costs, indicates that incremental annual revenue from this contract of \$197,775 vastly exceeds the sum of additional costs. Thus, the CUDA contract will, if extended, provide additional revenue to support the costs of the TAWC system. As a result, this contract spreads the costs associated with common plant, such as mains, tanks and water production facilities over a greater volume of water, benefiting all TAWC customers.

Absent the contract with CUDA, the support provided by the incremental revenues from CUDA, and thus the benefit to TAWC's customers, would be lost.

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Grady Stout

2-6. Alternative Supplies. Refer to the Company's response to Consumer Advocate DR No. 1-15 regarding the statement in Company witness Stout's testimony that CUDA "believes that it can provide reliable and safe water via its own groundwater plant and other sources." TAWC's response to this request indicates that this statement was made in oral discussions. However, this docket represents a Joint Petition filed by both TAWC and CUDA. As a result, the Consumer Advocate requires an individual response from both Parties to this request. Specifically, we are requesting that CUDA provide documentation supporting that it can provide reliable and safe water via its own groundwater plant and other sources.

RESPONSE:

To the extent it is the Consumer Advocate's position that TAWC did not appropriately respond to DR 1-15, TAWC disagrees. Referring to Company Witness Grady Stout's Pre-Filed Direct Testimony, in DR 1-15 the CAD asked TAWC to "Provide a copy of all communications confirming that CUDA 'believes that it can provide reliable and safe water via its own groundwater plant and other sources.'" As Witness Stout could recall no written communications regarding the same, the Company responded accordingly in good faith. The Company stands by its response to DR 1-15. Aside from the CAD's position regarding the Company's response to DR 1-15, TAWC responds to this request, DR 2-6, as follows: See TAWC's Response to Consumer Advocate's DR 1-16. CUDA's 2022 Water Quality Report contains certain information that supports CUDA's ability to provide safe and reliable water via its own groundwater plant and other alternative sources.

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Grady Stout

2-7. Alternative Supplies. Refer to the Company's response to Consumer Advocate DR No. 1-16 regarding studies possessed by CUDA relative to alternative water sources.

TAWC's response to this request indicates that the Company is not in possession of such studies. However, this Docket represents a Joint Petition filed by both TAWC and CUDA.

As a result, the Consumer Advocate requires an individual response from both Parties to this request. Specifically, we are requesting that CUDA provide all studies possessed by CUDA relative to alternative water sources.

RESPONSE:

TAWC objects to this request on the grounds that it is cumulative. As CUDA has long-established alternative sources of water, the information requested is cumulative. While this request might be reasonable under other facts not present in TPUC Docket No. 23-00066 to demonstrate credible bypass options, under the facts presented in this particular case this request is cumulative. Subject to and without waiving the foregoing objection, TAWC responds as follows: See TAWC's Response to Consumer Advocate's DR 1-16. CUDA's 2022 Water Quality Report identifies certain existing alternative water sources for CUDA.

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Grady Stout

2-8. Site Identification. Refer to the Company's response to Consumer Advocate DR No. 1-17 regarding the transmission line map from TAWC's water system to the individual CUDA delivery points. The Company's response indicates that the map supplied is confidential and proprietary. Explain the Company's rationale for requesting confidential and proprietary treatment for this map. If the Company no longer believes that this information is confidential and proprietary, then the Consumer Advocate requests that the Company direct that this designation be removed.

RESPONSE:

The map supplied by the Company is confidential and proprietary information. The rationale for the request of confidential and proprietary treatment of this map is for the security of critical infrastructure, specifically the location and sizing of water mains. The Company, both individually and on behalf of CUDA believes the mapping requested here shows critical water main infrastructure that requires this designation. Under the state's open records laws, Tenn. Code 10-7-504(21)(A): "The following records shall be treated as confidential and shall not be open for public inspection: (i) Records that would allow a person to identify areas of structural or operational vulnerability of a utility service provider or that would permit unlawful disruption to, or interference with, the services provided by a utility service provider." Accordingly, the Company believes its designation appropriate and narrowly tailored.

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Grady Stout

2-9. Alternative Supplies. Refer to the Company's response to Consumer Advocate DR No. 1-18 regarding the identity and location of alternate sources of supply and transmission lines in proximity to CUDA's water distribution system along with the daily available capacity from each source.

TAWC's response to this request indicates that the Company is not in possession of this information. However, this Docket represents a Joint Petition filed by both TAWC and CUDA. As a result, the Consumer Advocate requires an individual response from both Parties to this request. Specifically, we are requesting that CUDA provide a map showing the alternate sources of supply and transmission lines in proximity to CUDA's water distribution system along with the daily available capacity (in gallons and CCF) from each source.

RESPONSE:

TAWC objects to this request on the grounds that it is cumulative and burdensome. As CUDA has long-established alternative sources of water, the information requested is cumulative. Given the cumulative nature of the information requested, the request is also, among other things, burdensome in that it would likely require TAWC or CUDA to seek specific and detailed capacity information from third parties to formally support CUDA purchasing water from a utility other than such third parties. While this request might be reasonable under other facts, not present in TPUC Docket No. 23-00066, to demonstrate credible bypass options, here under the facts presented this request is both cumulative and burdensome. Subject to and without waiving the foregoing objection, TAWC responds as follows: See TAWC's Response to Consumer Advocate's DR 1-16. CUDA's 2022 Water Quality Report identifies certain existing alternative sources of water for CUDA.

**TENNESSEE-AMERICAN WATER COMPANY
CASE NO. 2023-00066
CONSUMER ADVOCATE'S SECOND DATA REQUESTS**

Witness: Bob Lane

2-10. Embedded Cost. Refer to the Company's response to Consumer Advocate DR No. 1-19 regarding the embedded cost of the transmission line to serve CUDA. The Company's response indicates the cost of this transmission line was approximately \$2.2 million and was placed in service in 2014. Please provide in Excel format with all formulas intact, the calculation of the annual depreciation expense and resulting accumulated depreciation related to this transmission line.

RESPONSE:

Please see attached spreadsheet in Excel format < TAW-CAD-Set 2 - DR010 ATTACHMENT Depreciation>

Month	Original Investment	Depreciation Rate	Depreciation Expense	End Reserve
Jul-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,184,178.98
Aug-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,182,211.45
Sep-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,180,243.91
Oct-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,178,276.38
Nov-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,176,308.85
Dec-14	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,174,341.32
Jan-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,172,373.79
Feb-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,170,406.26
Mar-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,168,438.72
Apr-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,166,471.19
May-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,164,503.66
Jun-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,162,536.13
Jul-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,160,568.60
Aug-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,158,601.06
Sep-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,156,633.53
Oct-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,154,666.00
Nov-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,152,698.47
Dec-15	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,150,730.94
Jan-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,148,763.40
Feb-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,146,795.87
Mar-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,144,828.34
Apr-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,142,860.81
May-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,140,893.28
Jun-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,138,925.75
Jul-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,136,958.21
Aug-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,134,990.68
Sep-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,133,023.15
Oct-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,131,055.62
Nov-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,129,088.09
Dec-16	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,127,120.55
Jan-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,125,153.02
Feb-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,123,185.49
Mar-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,121,217.96
Apr-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,119,250.43
May-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,117,282.89
Jun-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,115,315.36
Jul-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,113,347.83
Aug-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,111,380.30
Sep-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,109,412.77
Oct-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,107,445.24
Nov-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,105,477.70
Dec-17	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,103,510.17
Jan-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,101,542.64
Feb-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,099,575.11
Mar-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,097,607.58
Apr-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,095,640.04
May-18	\$ 2,186,146.51	0.0108	\$ 1,967.53	\$ 2,093,672.51

Jun-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,091,704.98
Jul-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,089,737.45
Aug-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,087,769.92
Sep-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,085,802.39
Oct-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,083,834.85
Nov-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,081,867.32
Dec-18	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,079,899.79
Jan-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,077,932.26
Feb-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,075,964.73
Mar-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,073,997.19
Apr-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,072,029.66
May-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,070,062.13
Jun-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,068,094.60
Jul-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,066,127.07
Aug-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,064,159.53
Sep-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,062,192.00
Oct-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,060,224.47
Nov-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,058,256.94
Dec-19	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,056,289.41
Jan-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,054,321.88
Feb-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,052,354.34
Mar-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,050,386.81
Apr-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,048,419.28
May-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,046,451.75
Jun-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,044,484.22
Jul-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,042,516.68
Aug-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,040,549.15
Sep-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,038,581.62
Oct-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,036,614.09
Nov-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,034,646.56
Dec-20	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,032,679.02
Jan-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,030,711.49
Feb-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,028,743.96
Mar-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,026,776.43
Apr-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,024,808.90
May-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,022,841.37
Jun-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,020,873.83
Jul-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,018,906.30
Aug-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,016,938.77
Sep-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,014,971.24
Oct-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,013,003.71
Nov-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,011,036.17
Dec-21	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,009,068.64
Jan-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,007,101.11
Feb-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,005,133.58
Mar-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,003,166.05
Apr-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 2,001,198.52
May-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,999,230.98
Jun-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,997,263.45
Jul-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,995,295.92


Aug-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,993,328.39
Sep-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,991,360.86
Oct-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,989,393.32
Nov-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,987,425.79
Dec-22	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,985,458.26
Jan-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,983,490.73
Feb-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,981,523.20
Mar-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,979,555.66
Apr-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,977,588.13
May-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,975,620.60
Jun-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,973,653.07
Jul-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,971,685.54
Aug-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,969,718.01
Sep-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,967,750.47
Oct-23	\$	2,186,146.51	0.0108	\$	1,967.53	\$ 1,965,782.94

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 23 day of October, 2023.


Notary Public

My Commission expires: 10/20/2024



CERTIFICATE OF SERVICE

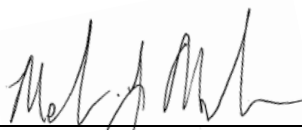
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Karen H. Stachowski, Esq.
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Randall Crawford, Chairman
c/o David Collett
Catoosa Utility District Authority
P.O. Box 750
Ringgold, GA 30736
dcollett@catoosautility.com

This the 24th day of October 2023.



Melvin J. Malone