

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>PETITION OF TENNESSEE-</b>	)	
<b>AMERICAN WATER COMPANY</b>	)	<b>DOCKET NO. 24-00002</b>
<b>REGARDING THE 2024 PRODUCTION</b>	)	
<b>COSTS AND OTHER PASS-</b>	)	
<b>THROUGHS RIDER</b>	)	

## CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS TO TENNESSEE AMERICAN WATER COMPANY

This Second Set of Discovery Requests is hereby served upon Tennessee-American Water Company (“TAWC” or the “Company”), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11. The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Victoria B. Glover, on or before 2:00 p.m. (central), March 12, 2024.

## PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Set of Discovery Requests to TAWC* sent to the Company on February 8, 2024, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

## **SECOND SET OF DISCOVERY REQUESTS**

2-1. Source & Support. Refer to the < TAWC Attachment 1-3\_NRW\_Data > spreadsheet filed with the Company's Response to Consumer Advocate DR No. 1-3, specifically cells "C14", "D22", and "E22".

- a. Has the Company determined the cause(s) of the large rise(s) in identified leaks in non-revenue water represented in these cells?
- b. If yes, provide a brief narrative explanation of the causes(s) of the increases along with any actions the Company has taken to remediate the causes(s).
- c. If no, provide a brief explanation of the Company's reasoning for declining to explore the large increase in identified leaks in non-revenue water incurred during these dates.

### **RESPONSE:**

2-2. Source & Support. Refer to the < TAWC Attachment 1-3\_NRW\_Data > spreadsheet filed with the Company's Response to Consumer Advocate DR No. 1-3, specifically cell "C6".

- a. Has the Company determined the cause(s) of the large rise in inactive customer account usage in non-revenue water represented for Jan-23?
- b. If yes, provide a brief narrative explanation of the causes(s) of the increase.
- c. If no, provide a brief explanation of the Company's reasoning for declining to explore the large increase in inactive customer account usage during Jan-23.

### **RESPONSE:**

RESPECTFULLY SUBMITTED,



---

VICTORIA B. GLOVER (BPR No. 037954)

Assistant Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 360-4219

Fax: (615) 741-1026

Email: [Victoria.Glover@ag.tn.gov](mailto:Victoria.Glover@ag.tn.gov)

**TPUC Docket No. 24-00002**

*CA's 2<sup>nd</sup> DR to TAWC*

## **CERTIFICATE OF SERVICE**

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

Robert C. Lane  
Senior Manager, Rates and Regulatory  
Tennessee-American Water Company  
109 Wiehl Street  
Chattanooga, TN 37403  
Email: [Bob.Lane@amwater.com](mailto:Bob.Lane@amwater.com)

Melvin J. Malone  
Katherine Barnes  
Butler Snow LLP  
The Pinnacle at Symphony Place  
150 3rd Avenue South, Suite 1600  
Nashville, TN 37201  
Email: [Melvin.Malone@butlersnow.com](mailto:Melvin.Malone@butlersnow.com)  
Email: [Katherine.Barnes@butlersnow.com](mailto:Katherine.Barnes@butlersnow.com)

This the 27<sup>th</sup> day of February, 2024.



---

VICTORIA B. GLOVER  
Assistant Attorney General