

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

IN RE:)
)
)
TENNESSEE-AMERICAN WATER)
COMPANY's 2024 INCREMENTAL) DOCKET NO. 24-00011
CAPITAL RECOVERY RIDER TARIFF)
PETITION)
)

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), April 10, 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 Informal Set of Discovery Requests to Tennessee-American Water* sent to the Company on March 18, 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. Explanation and Source & Support. Provide a narrative discussion addressing the extent to which the installation costs of Mains vary on a cost per mile basis among the Company's service areas. That is, are Main installation costs higher in certain service areas than others? To the extent the Company maintains cost data by service area, provide the installed cost per mile of Mains by area, for the years 2021 – 2023.

RESPONSE:

RESPECTFULLY SUBMITTED,



VICTORIA B. GLOVER (BPR No. 037954)

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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 sent via electronic mail, upon:

Robert C. Lane
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109 Wiehl Street
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This the 5th day of April, 2024.



Victoria B. Glover
Assistant Attorney General