

April 10, 2024

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on April 10, 2024 at 11:41 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: *Tennessee-American Water Company's 2024 Incremental Capital Recovery Rider Tariff Petition, Docket No. 24-00011*

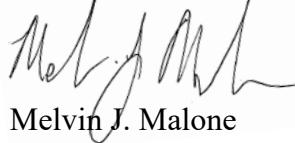
Dear Chairman Hilliard:

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

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
Victoria Glover, Consumer Advocate Division
Vance Broemel, Consumer Advocate Division

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

IN RE:

**TENNESSEE-AMERICAN WATER
COMPANY'S 2024 INCREMENTAL
CAPITAL RECOVERY RIDER TARIFF
PETITION**

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DOCKET NO. 24-00011

**TENNESSEE-AMERICAN WATER COMPANY'S RESPONSES
TO SECOND SET OF DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE**

Tennessee-American Water Company ("TAWC"), by and through counsel, hereby submits its Responses to the Second Set of 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. 24-00011
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Grady Stout

Question:

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:

Installation costs of Mains can vary on a cost per mile basis due to several factors, including pipe size, pipe material, terrain, soil conditions, and restoration cost. The largest factor in the cost difference shown below stems primarily from restoration cost post-installation. This difference is driven by the City of Chattanooga's street paving ordinance. This ordinance requires specific types of backfill based on the location of the restoration and requires more street paving when excavating in the street.

| | 2021 | | | 2022 | | | 2023 | | |
|------------------|----------------|------------------------------|---------------|----------------|------------------------------|----------------|----------------|------------------------------|----------------|
| Service Area | Feet Installed | Total Cost Main Installation | Cost per Mile | Feet Installed | Total Cost Main Installation | Cost per Mile | Feet Installed | Total Cost Main Installation | Cost per Mile |
| Chattanooga | 19,412 | \$3,524,534.19 | \$958,661.68 | 19,820 | \$4,067,659.17 | \$1,083,614.55 | 24,299 | \$5,851,332.58 | \$1,271,452.98 |
| Whitwell | 5734 | \$316,268.11 | \$291,227.00 | 5,072 | \$594,091.90 | \$618,455.29 | 5,275 | \$981,582.75 | \$982,513.16 |
| Suck Creek | 185 | \$8,333.25 | \$237,835.46 | 0 | 0 | - | 0 | 0 | - |
| Jasper Highlands | 0 | 0 | - | 0 | 0 | - | 0 | 0 | - |


*Please note that the numbers in the chart above do not include developer funded main installations. Secondly, and for the purposes of this chart, Chattanooga service areas includes some areas outside of Chattanooga, such as Lookout Mountain.

STATE OF Tennessee)

COUNTY OF Hamilton)

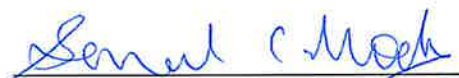
BEFORE ME, the undersigned, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Grady Stout, being by me first duly sworn deposed and said that:

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.



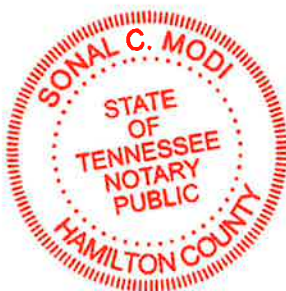
Grady Stout

Sworn to and subscribed before me
this 8th day of April, 2024.



Notary Public

My Commission expires: 09/16/2026




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:

Victoria B. Glover, Esq.
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Victoria.Glover@ag.tn.gov

Vance L. Broemel, Esq.
Managing Attorney
Office of the Tennessee Attorney General
Consumer Advocate Division
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Nashville, TN 37202-0207
Vance.Broemel@ag.tn.gov

This the 10th day of April 2024.



Melvin Malone