

IN RE:)	
)	
TENNESSEE WATER SERVICE, INC.)	
PETITION FOR APPROVAL OF ITS)	
2024 ANNUAL RATE REVIEW FILING)	DOCKET NO. 24-00028
PURSUANT TO TENN. CODE ANN. §)	
65-5-103(d)(6) AND REQUEST FOR)	
RATE STRUCTURE MODIFICATION)	

This Second Set of Discovery Requests is hereby served upon Tennessee Water Service, Inc., (“TWS”), 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 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 Shilina B. Brown on or before Monday, June 17, 2024, at 2:00 p.m. CST.

This Second Set of Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as set forth in the Consumer Advocate’s First Set of Discovery Request to TWS filed May 20, 2024, 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. Refer to the File <CA 1-1 Deferred Operating Loss> and provide source documentation for the following account activity:

- a. Account 610, Purchased Water July 2019 - \$17,265;
- b. Accounts 630 – 636, Contractual Services December 2018, \$3,643;
- c. Account 675, Miscellaneous Expense, March 2019, (\$27,026); and
- d. Account 675, Miscellaneous Expense, May 2019, \$6,452.

RESPONSE:

2-2. Refer to the File <CA 1-2 TWS Accruals>. Provide the information requested in Consumer Advocate DR No. 1-2 for 2019 in the same format as was provided for 2020 – 2023.

RESPONSE:

2-3. Refer to the response to Consumer Advocate DR No. 1-3. Provide the meter read dates for the two reads immediately prior to the January 30, 2023, reading.

RESPONSE:

2-4. [REDACTED]
[REDACTED]
[REDACTED]:
a. [REDACTED].
b. [REDACTED].

c. [REDACTED]

RESPONSE:

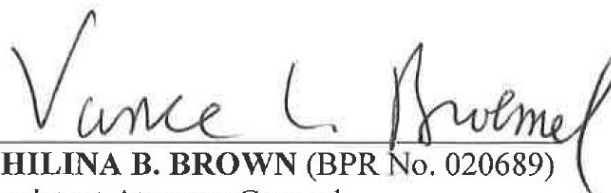
2-5. Discuss the rationale for, on one hand, including a net operating loss as a component of Accumulated Deferred Income Taxes and, on the other hand, including deferred charges comprised of the pre-tax operating loss rather than the after-tax loss.

RESPONSE:

2-6. [REDACTED]

RESPONSE:

RESPECTFULLY SUBMITTED,



SHILINA B. BROWN (BPR No. 020689)
Assistant Attorney General
VANCE L. BROEMEL (BPR No. 011421)
Managing Attorney
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Phone: (615) 741-2357
Fax: (615) 741-1026
Email: Shilina.Brown@ag.tn.gov
Email: Vance.Broemel@ag.tn.gov

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 provided by electronic mail, upon:

Ryan A. Freeman, Esq.
Baker, Donelson, Bearman
Caldwell & Berkowitz, PC
Suite 1900 Republic Centre
633 Chestnut Street
Chattanooga, TN 37450
Email: rffreeman@bakerdonelson.com

Philip J. Drennan
VP, Finance
Tennessee Water Service, Inc.
500 W. Monroe Street, Suite 3600
Chicago, IL 60661-3779
Email: phil.drennan@uiwater.com

This the 10th day of June, 2024.


VANCE L. BROEMEL
Managing Attorney