

June 13, 2024

**VIA ELECTRONIC FILING**

Hon. Herbert H. Hilliard, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

Electronically Filed in TPUC Docket  
Room on June 13, 2024 at 4:05 p.m.

Re: ***Petition of Tennessee American Water Company to Modify Tariff, Change and Increase Charges, Fees, and Rates, and for Approval of a General Rate Increase;***  
***TPUC Docket No. 24-00032***

Dear Chairman Hilliard:

In response to the Consumer Advocate's Motion for Leave to Issue More Than Forty Discovery Requests (the "*Motion*"), Tennessee-American Water Company ("TAWC" or "Company") does not object to the Consumer Advocate Division's ("Consumer Advocate" or "CAD") June 7<sup>th</sup> request to issue approximately 250 total discovery requests, including subparts, to TAWC.<sup>1</sup> Notwithstanding the foregoing, the Company reserves its right to object to the number of future requests by the CAD in this docket. The Company does not interpret the CAD's request as open-ended or a request for an unlimited number of future discovery requests, but rather as a request to issue the June 7<sup>th</sup> discovery requests. In the unlikely event the Commission interprets the *Motion* as open-ended, TAWC hereby respectfully requests the opportunity to formally object to the *Motion*.

Finally, the Company reserves its right to object to future requests by the CAD to serve additional written discovery in this docket. To the extent the CAD intends to serve additional requests, TAWC invites the Consumer Advocate to meet and confer to determine whether such additional discovery can be streamlined or reduced.

---

<sup>1</sup> The Company reserves the right to substantively object to each request submitted by the Consumer Advocate on June 7, 2024.

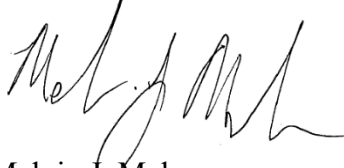
June 13, 2024

Page 2

Should you have any questions, please do not hesitate to contact me.

Respectfully,

BUTLER SNOW LLP

A handwritten signature in black ink, appearing to read 'Melvin J. Malone', written over the printed name.

Melvin J. Malone

MJM:cb

cc: Shilina B. Brown, Consumer Advocate Division  
Victoria B. Glover, Consumer Advocate Division  
Vance L. Broemel, Consumer Advocate Division  
Rick Hitchcock, Counsel for the City of Chattanooga  
Catherine S. Dorvil, Counsel for the City of Chattanooga  
Phillip A. Noblett, Chattanooga City Attorney

88189419.v1