

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

IN RE:

**PETITION OF TENNESSEE-AMERICAN
WATER TO MODIFY TARRIFF,
CHANGE AND INCREASE CHARGES,
FEES, AND RATES, AND FOR
APPROVAL OF GENERAL RATE
INCREASE**

DOCKET NO. 24-00032

FILED: August 14, 2024

**SECOND SET OF DISCOVERY REQUESTS OF UTILITY WORKERS
UNION OF AMERICA, AFL-CIO, AND UWUA LOCAL 121
TO TENNESSEE-AMERICAN WATER COMPANY**

Pursuant to the Order Establishing Procedural Schedule entered in this matter on June 13, 2024, the Utility Workers Union of America, AFL-CIO (“UWUA”) and UWUA Local 121 (collectively “UWUA”), by and through counsel, submit the following Second Set of Discovery Requests (the “Requests”) to Petitioner Tennessee-American Water Company (“TAWC” or the “Company”). UWUA incorporates by reference the definitions and instructions set forth in its initial discovery requests. TAWC’s responses to these Requests shall be delivered to counsel for UWUA in accordance with the Order Establishing Procedural Schedule.

DISCOVERY REQUESTS

1. Please provide all documents that state TAWC’s policies and procedures for inspections, replacement, exercising, operation, or repair of valves or fire hydrants in effect at any time since January 1, 2020. The documents produced shall include, without limitation, any TAWC or AWK policies and procedure manuals and/or standard operating procedures for inspections,

replacement, exercising, operation, or repair of valves or hydrants.

RESPONSE:

2. Please provide copies of any water utility industry standards or guidelines in the possession of TAWC or AWK that describe recommended or best practices or procedures for valve or fire hydrant inspections, replacement, exercising, operation, or repair, including but not limited to any such standards or guidelines concerning the frequency of valve or hydrant inspections and/or the time period within which utilities should repair valves or hydrants once they have been discovered to be broken, in disrepair, or out of service.

RESPONSE:

3. Please provide copies of all laws, rules, or regulations that TAWC believes govern its inspections, replacement, exercising, operation, or repair of valves or fire hydrants, including but not limited to laws, rules, or regulations concerning the frequency of valve or hydrant inspections and/or the time period within which the Company must repair valves or hydrants once they have been discovered to be broken, in disrepair, or out of service.

RESPONSE:

4. Please provide a full and detailed statement of and documents showing any instructions given by TAWC to employees concerning the policies, practices, procedures, or expectations to be followed or met for the inspection, replacement, exercising, operation, or repair of valves or fire hydrants at any time since January 1, 2020. The information provided shall include a statement describing in detail any oral instructions given by TAWC to employees concerning procedures to be followed for inspections of valves or hydrants (including during all meetings of Distribution

Department employees), as well as copies of any written instructions. TAWC's response should also include a detailed description of any changes implemented since January 1, 2023 of any instructions, policies, practices, procedures, or expectations to be followed or met for the inspection, replacement, exercising, operation, or repair of valves or fire hydrants.

RESPONSE:

5. Please identify all TAWC supervisory or managerial employees who have provided instructions to hourly employees – whether orally or in writing – concerning the policies, practices, procedures, or expectations to be followed or met for the inspection, replacement, exercising, operation, or repair of valves or fire hydrants, or changes made to such instructions or policies, at any time since January 1, 2023. Please also provide copies of any notes, reports, or similar documents taken or prepared by such supervisory or managerial employees that reflect, summarize, or otherwise concern any such instructions or changes in instructions or policies.

RESPONSE:

6. TAWC's response to UWUA First Discovery Request 2 and TAW_R_UWUADR1_002_073024_Response identify 646 open work orders for water valves in need of repair or investigation as of June 30, 2024, including 48 open work orders for broken water valves, 76 for leaking valves, and 33 for valves otherwise in need of repair. Please provide a full and detailed explanation of why the Company has failed to complete work orders for all broken or leaking valves for which work orders have been open for more than one year, as well as an explanation and assessment of the potential reliability and public safety impacts of failure to ensure that a water utility's distribution valves are operating properly.

RESPONSE:

7. With reference to the “large valve project” cited in TAW_R_UWUADR1_001_073024_Response, please provide a full and detailed description of and documents concerning this project. The documents produced shall include, without limitation, documents provided to hourly employees instructing employees to inspect particular valves and what such inspections should entail, or notes of any such oral instructions; reports or similar documents prepared by hourly employees summarizing the results of such inspections, including any documents that summarize or reflect the identities of valves inspected and their locations, accessibility, size, and/or operability or functionality; reports, results of valve inspections, or similar documents submitted to TAWC’s Engineering Department; reports, work orders, or similar documents prepared by Engineering Department or other TAWC personnel assessing or reporting on any results or findings of the large valve project, including any documents reflecting valves in need of repair, maintenance, or replacement; and documents showing the actions TAWC took in response to any recommendations for valves found to be in need of repair, maintenance, or replacement.

RESPONSE:

8. TAWC’s response to UWUA First Discovery Request 5 and TAW_R_UWUADR1_006_073024_Attachment identify thirty-one “active” fire hydrants that are “out of service” as of June 30, 2024, and indicate that these hydrants have been out of service since dates ranging from December 8, 2022 through June 19, 2024. Please provide a full and detailed explanation why the Company has failed to promptly return these thirty-one hydrants to service, as well as an explanation and assessment of the potential public safety impacts of allowing fire hydrants to remain out of service for extended periods of time.

RESPONSE:

9. With reference to TAW_R_UWUADR1_006_073024_Attachment, please provide a statement detailing the circumstances in which TAWC places fire hydrants in “retired” status.

RESPONSE:

10. TAWC’s response to UWUA First Discovery Request 15 and TAW_R_UWUADR1_015_073024_Response identify 395 open work orders as of June 30, 2024 involving reported leaks in water mains, service lines, or other infrastructure, including eight work orders opened between May 2023 and April 2024 involving water main breaks or water main investigations designated by TAWC as “emergencies.” Please provide a full and detailed explanation why the Company has failed to complete these eight work orders, and also whether TAWC has completed the four additional “emergency” or “high priority” work orders involving water main breaks or main investigations opened in June 2024.

RESPONSE:

11. For each calendar year since and including 2020 and for the half-year ending June 30, 2024, please provide a detailed statement of the average waiting time for TAWC customers requesting new service installations (from the time of the new service request until the date of completion), categorized by meter size, as well as copies of all TAWC or AWK reports or other documents summarizing or reporting this information.

RESPONSE:

12. With reference to TAWC’s response to UWUA First Discovery Request 17(b), please

explain what the Company means when it states that some of the unfulfilled new service installation work orders “include requests from developers that are not yet ready for installation by field crews,” and provide the specific number of unfulfilled service requests as of June 30, 2024 that fall into this category.

RESPONSE:

13. Grady Stout’s prepared testimony at 38:14-16 states that the Company added 1,652 new customers in 2023, while TAWC’s response to UWUA First Discovery Request 17(b) states the Company completed only 1,333 work orders that year for new service installations. Please explain this discrepancy.

RESPONSE:

14. TAWC’s response to UWUA First Discovery Request 17(b) states there were 505 unfulfilled new service installations as of June 30, 2024, but TAW_R_UWUADR1_017_073024_Response shows 158 incomplete NSI work orders as of that date. Please explain this discrepancy.

RESPONSE:

15. With reference to the “All Incompleted Notifications” worksheet in TAW_R_UWUADR1_017_073024_Response, please explain what TAWC means by an “incompleted notification” and specifically what information this worksheet is designed to convey.

RESPONSE:

16. For each calendar year since and including 2020 and for the half-year ending June 30,

2024, provide data detailing the number of new service request forms issued by TAWC to Distribution Department employees; the number of new “meter set orders” or “service turn-on (STO)” forms completed by Meter Shop employees; the corresponding number of backlogs of unfulfilled new service requests; copies of any TAWC or AWK reports summarizing or documenting this information; and a detailed explanation if TAWC’s response to this discovery request differs in any way from the work order data provided by TAWC in its response to UWUA First Discovery Request 17.

RESPONSE:

17. For each calendar year since and including 2020 and for the half-year ending June 30, 2024, provide data detailing (a) the total dollar amounts paid by TAWC to outside contractors and (b) the total hours worked by contractor employees for the delivery of utility services, in each case categorized separately for water production, distribution system maintenance, construction, outside commercial (e.g., meter reading, maintenance, and installation), and other.

RESPONSE:

18. TAWC’s response to UWUA First Discovery Request 1 and TAW_R_UWUADR1_001_073024 (under Response B) provide no data showing the target number of valve inspections planned by TAWC for the years 2022, 2023, or 2024. Please provide the number of valve inspections targeted by TAWC for each of the years from 2022-2024.

RESPONSE:

19. TAWC’s response to UWUA First Discovery Request 21 does not provide data showing which of the referenced job classifications are currently filled, and which additional job classifications the Company may fill in the future as part of its forecasted 117 full-time employees.

Please supplement TAWC's response to this discovery request by providing this information.

RESPONSE:

Dated: August 14, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Second Set of Discovery Requests of Utility Workers Union of America, AFL-CIO, and UWUA Local 121 to Tennessee-American Water Company* was served via U.S. Mail, with a courtesy copy sent via electronic mail, upon:

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