

BUTLER | SNOW

August 14, 2024

Electronically Filed in TPUC Docket
Room on August 14, 2024 at 1:08 p.m.

VIA ELECTRONIC FILING

Hon. David Jones, 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: *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 Jones:


Attached for filing please find *Tennessee-American Water Company's Supplemental Response Nos. 1-1 and 1-21 to First Discovery Requests of Utility Workers Union of America, AFL-CIO, and UWUA Local 121* in the above-captioned matter.

The Company is supplementing its Original Response to UWUA DR 1-1 and 1-21 at the request of UWUA.

As required, the original plus four (4) hard copies will follow. 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
Shilina Brown, Consumer Advocate Division
Victoria Glover, Consumer Advocate Division
Phillip Noblett, City of Chattanooga
Frederick Hitchcock, City of Chattanooga
Scott Tift, UWUA

*The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201*

MELVIN J. MALONE
615.651.6705
melvin.malone@butlersnow.com

*T 615.651.6700
F 615.651.6701
www.butlersnow.com*

BUTLER SNOW LLP

89060146.v1

**TENNESSEE AMERICAN WATER COMPANY
TENNESSEE PUBLIC UTILITY COMMISSION
DOCKET NO. 24-00032
FIRST DISCOVERY REQUEST OF THE
UWUA**

Responsible Witness: Grady Stout

Question:

1. For each calendar year since and including 2012, please provide a statement showing:
 - (a) the total numbers of operable and inoperable valves in the TAWC system (categorized by valve size and operability);
 - (b) the number of valves intended or planned by TAWC to be operated, inspected, maintained, and/or repaired during each year; and
 - (c) the number of valves in fact operated, inspected, maintained, and/or repaired during each year.

Supplemental Response (8/14/2024):

The Company's objections set forth in its Original Response apply here as well. Notwithstanding the Company's objections, please see below for the Company's response to UWUA's request that TAWC provide a supplemental response / clarification that identifies the number of targeted inspections for each of the years from 2022-2024.

There was no target number of valve inspections for 2022.

The target number of valve inspections for 2023 was 2614.

The target number of valve inspections for 2024 was 2535.

Original Response:

The Company objects to this request on the grounds that it is overly broad and unduly burdensome as to the time period requested. Any attempt to provide the requested information prior to the 2020 timeframe would require substantial resources and even still would not be possible due to various information systems retirements, changes and new integrations over the years. The Company further objects to subsection (a) of this request on the grounds that the terms "operable" and "inoperable" are vague and overly broad.

Subject to and without waiving these objections, the Company responds as follows, beginning with the year 2020:

As part of the response for subsections (a) and (b), see Response Number 1 TAW Attachment to UWUA DR 1_001 for the number of valves by size for TAWC distribution valves and Key Performance Indicators or KPIs.

- (A) Generally, and attempting in good faith to use the term set forth in subsection (a) of this request, the Company considers an “inoperable” valve as one that is broken. On the other hand, and again attempting in good faith to employ the term set forth in the request, the Company considers an “operable” valve as one that the Company can operate – open and close – and commence or shut down the water flow to said valve. Notwithstanding the above, some scenarios may not clearly fall within the foregoing parameters or the words “operable” or “inoperable.” For instance, a valve that has been paved over can be accessed and operated if necessary and thus would be considered operable. Further, a valve that is missing a part may also be considered operable, as the missing part can be easily repaired. Also, and again by way of example, there are circumstances in which a leaking valve might be considered “operable,” and other situations in which a leaking valve could be considered “inoperable,” largely depending on the type and size of the leak. The generation of the work orders described in this response comes from the Company becoming aware of a potential problem with a valve.

In 2024, the Company has 48 open work orders (work orders that have been identified with a potential issue but not yet worked to completion) for “inoperable” or broken valves. The Company also has open work orders for 76 valve leaks, 33 valve repairs, and 489 valve investigations. For 2024 completed work orders (work orders where the Company has taken an open work order and marked it complete) there is 1 broken valve, 1 repair, 1 leaking and 2 no issues, meaning these valves were identified as having a potential issue but upon further investigation no issues were discovered with the valves. The afore-referenced 2024 orders were initiated between January 1, 2020 to June 30, 2024.

In 2023, the Company had 1 work order completed for “inoperable” or broken valve. The Company also had works order completed for 6 valve leaks and 1 valve repair. There were also 11 No Issue Found-Valves, meaning these valves were investigated and no issues were discovered with the investigated valves.

In 2022 the Company had 2 work orders completed for “inoperable” or broken valves. The Company also had work orders completed for 8 valve leaks and 1 valve repair. There were also 15 No Issue Found Valves.

In 2021 the Company had 1 work order completed for “inoperable” or broken valve. The Company also had works order completed for 7 valve leaks, 0 valve repairs. There were also 17 No Issue Found-Valves.

In 2020 the Company had 1 work order completed for “inoperable” or broken valve. The Company also had work orders completed for 0 valve leaks, and 12 valve repairs. There were also 11 No Issue Found-Valves.

(B) Internal Company goals have varied depending on a number of factors, including the needs of the Company, leadership changes, and leadership objectives. In some instances, annual goals may not have been identified or captured. The Company’s current valve operation and inspection goal is to inspect all valves 16 inches and larger annually and to inspect all valves smaller than 16 inches every 6 years. Valves found either by operation and inspection or by reported problems to need maintenance are scheduled for maintenance or such maintenance is conducted at the time the issue is discovered if possible. The Company’s readily accessible documentation of past leadership goals is in the attached Key Performance Indicators, which captures planned valve inspections. Please see attachment TAW_R_UWUADR1_001_073024_Response.

(C)

| Year | Valves Inspected, Maintained, and Repaired |
|-------|--|
| 2020 | 2467 |
| 2021 | 1197 |
| 2022 | 1637 |
| 2023 | 2223 |
| 2024* | 2378 |

*(through June 30th see response to (a) above describing open work orders for further inspections)

**TENNESSEE AMERICAN WATER COMPANY
TENNESSEE PUBLIC UTILITY COMMISSION
DOCKET NO. 24-00032
FIRST DISCOVERY REQUEST OF THE
UWUA**

Responsible Witness: Grady Stout

Question:

21. With reference to the testimony of Grady Stout at 38: 7-18 and 39: 1-5, please categorize how many of the total forecasted 117 full-time TAWC employees will be union hourly employees, non-union hourly employees, and exempt employees, and identify the specific job classifications TAWC expects to fill for the additional full-time employees in the Company's forecasted 117 full-time employee staffing level over the current staffing level.

Supplemental Response (8/14/2024):

Please see below for the Company's response to UWUA's request that TAWC provide a supplemental response / clarification that identifies which of these 117 listed jobs are currently filled and which would be new additions. The below table provides a job title list as of 8-14-24. Positions with an asterisk are either vacant or currently being recruited.

| Job Title | Union Y or N | Hourly/Salary |
|---------------------------------|--------------|---------------|
| Business Development Specialist | N | S |
| Capital Program Coordinator* | N | S |
| Dir. Engineering | N | S |
| Director, Business Development | N | S |
| Distribution Clerk U121 | Y | H |
| Engineer* | N | S |
| Engineer* | N | S |
| Engineer Project Manager* | N | S |
| Engineer Project Manager | N | S |
| Engineering Clerk U121 | Y | H |
| Engineering Specialist | N | H |
| Executive Assistant | N | H |
| Field Service Person U121 | Y | H |
| Field Service Person U121 | Y | H |
| Field Service Records Spec U121 | Y | H |
| Field Service Records Spec U121 | Y | H |
| Field Service Rep U121 | Y | H |

| | | |
|-------------------------------------|---|---|
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121 | Y | H |
| Field Service Rep U121* | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121* | Y | H |
| Laborer U121 | Y | H |
| Laborer/Process Tech Apprentic U121 | Y | H |
| Laborer/Relief Process Tech U121* | Y | H |
| Laborer/Relief Process Tech U121 | Y | H |
| Laborer/Relief Process Tech U121 | Y | H |
| Lead Plant Operator | N | H |
| Maint Service Specialist | N | H |
| Manager WQ & Env Compliance | N | S |
| Master M Mechanic U121* | Y | H |
| Master M Mechanic U121* | Y | H |
| Master M Mechanic U121 | Y | H |
| Master M Mechanic U121 | Y | H |
| Master M Mechanic U121 | Y | H |
| Master M Mechanic U121 | Y | H |
| Meter Repairer U121 | Y | H |
| Mgr Automation & Controls (SCADA)* | N | S |

| | | |
|------------------------------------|---|---|
| Mgr External Affairs (Corp) | N | S |
| Mgr Opns | N | S |
| Operations Specialist | N | H |
| Operations Specialist | N | H |
| President (Medium States) | N | S |
| Process Technician U121* | Y | H |
| Process Technician U121 | Y | H |
| Process Technician U121* | Y | H |
| Process Technician U121 | Y | H |
| Production Clerk U121 | Y | H |
| Sr Cross Connect Specialist* | N | H |
| Sr Cross Connect Specialist* | N | H |
| Sr Mgr Operations | N | S |
| Sr Specialist Health & Safety | N | S |
| Sr Supervisor Production | N | S |
| Sr Supt Operations | N | S |
| Sr WQ & Env Compliance Specialist | N | S |
| Sr WQ & Env Compliance Specialist | N | S |
| Staff Engineer | N | S |
| Supervisor Production | N | S |
| Supervisor Production | N | S |
| Supervisor Production | N | S |
| Supvr Field Operations | N | S |
| Supvr Field Operations | N | S |
| Supvr Field Operations | N | S |
| Supvr Field Operations | N | S |
| Sr Supvr Field Operations | N | S |
| Technician Production (N) | N | H |
| Technician Production (N)* | N | H |
| Technician Production (N) | N | H |
| Technician Production (N) | N | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121 | Y | H |
| Truck Driver/Utility Wkr CDL U121* | Y | H |
| Truck Driver/Utility Wkr CDL U121* | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |

| | | |
|----------------------------------|---|---|
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Utility Technician | N | H |
| Utility Technician | N | H |
| Utility Technician | N | H |
| Utility Technician | N | H |
| VP Operations (medium state) | N | S |

Original Response:

Please see the chart below. This chart represents the Company's current information, which is subject to changes and modifications due to the needs of the business.

| Job Title | Union Y or N | Hourly / Salary |
|---------------------------------------|--------------|-----------------|
| Capital Program Coordinator | N | S |
| Dir Engineering | N | S |
| Engineer | N | S |
| Engineer | N | S |
| Staff Engineer | N | S |
| Engineering Clerk U121 | Y | H |
| Engineering Project Manager | N | S |
| Manager, Engineering Project Delivery | N | S |
| Engineering Specialist | N | H |
| Mgr Automation & Controls (SCADA) | N | S |
| Laborer U121 | Y | H |
| Laborer/Process Tech Apprentic U121 | Y | H |
| Laborer/Relief Process Tech U121 | Y | H |
| Laborer/Relief Process Tech U121 | Y | H |
| Laborer/Relief Process Tech U121 | Y | H |
| Process Technician U121 | Y | H |
| Process Technician U121 | Y | H |
| Process Technician U121 | Y | H |
| Process Technician U121 | Y | H |
| Supvr Production | N | S |

[illegible]

| | | |
|---|---|---|
| Supvr Field Operations | N | S |
| Mgr External Affairs (Corp) | N | S |
| Exec Asst (N) | N | H |
| President (Medium States) | N | S |
| Director, Business Development | N | S |
| Business Specialist, Business Development | N | S |
| Sr Specialist Health & Safety | N | S |
| Distribution Clerk U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Heavy Equipment Operator U121 | Y | H |
| Supvr Field Operations | N | S |
| Supvr Field Operations | N | S |
| Supvr Field Operations | N | S |
| Operations Specialist | N | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Wkr CDLU121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Truck Driver/Utility Worker U121 | Y | H |
| Senior Manager of Operations | N | S |
| VP Operations (medium state) | N | S |
| Maint Service Specialist | N | H |
| Chief Operator Lead Plant Operator | N | H |
| Technician Production (N) | N | H |

| | | |
|---------------------------|---|---|
| Technician Production (N) | N | H |
| Technician Production (N) | N | H |
| Technician Production (N) | N | H |
| Sr Supervisor Production | N | S |
| Sr Supt Opns | N | S |
| Utility Technician | N | H |
| Utility Technician | N | H |
| Utility Technician | N | H |
| Utility Technician | N | H |

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

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

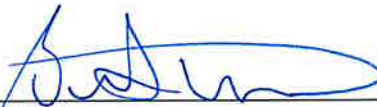
DOCKET NO. 24-00032

VERIFICATION

STATE OF Tennessee)

COUNTY OF Hamilton)

I, GRADY STOUT, being duly sworn, state that I am authorized to testify on behalf of Tennessee-American Water Company in the above-referenced docket, that if present before the Commission and duly sworn, verifies that the data requests and discovery responses are accurate to the best of my knowledge.



GRADY STOUT

Sworn to and subscribed before me
this 14 day of Aug, 2024.

Kathryn Robinson
Notary Public

My Commission expires: 10-20-2024



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:

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

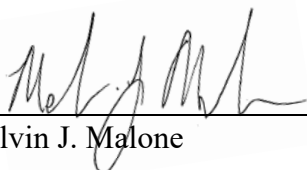
Victoria B. Glover, Esq.
Assistant Attorney General
Office of the Tennessee Attorney
General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Victoria.Glover@ag.tn.gov

Phillip A. Noblett, Esq.
City Attorney
Valerie Malueg, Esq.
Kathryn McDonald
Assistant City Attorneys
100 East 11th Street, Suite 200
City Hall Annex
Chattanooga, TN 37402
pnoblett@chattanooga.gov
vmalueg@chattanooga.gov
kmcdonald@chattanooga.gov
*Attorneys for the City of
Chattanooga*

Frederick L. Hitchcock, Esq.
Cathy Dorvil, Esq.
Chambliss, Bahner & Stophel, P.C.
Liberty Tower
605 Chestnut Street, Suite 1700
Chattanooga, TN 37450
fhitchcock@chamblisslaw.com
cdorvil@chamblisslaw.com
*Attorneys for the City of
Chattanooga*

Scott P. Tift, Esq.
David W. Garrison, Esq.
Barrett Johnston Martin & Garrison,
PLLC
200 31st Avenue North
Nashville, TN 37203
stift@barrettjohnston.com
dgarrison@barrettjohnston.com
Union Counsel

This the 14th day of August 2024.



Melvin J. Malone