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August 16, 2024

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

Electronically Filed in TPUC Docket
Room on August 16, 2024 at 7:59 a.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 Jones:

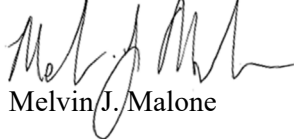
In response to the Utility Workers Union of America, AFL-CIO, and UWUA Local 121's Motion for Leave to File More Than Forty Discovery Requests (the "*Motion*"), Tennessee-American Water Company ("TAWC" or "Company") respectfully submits that it does not object to the Utility Workers Union of America, AFL-CIO, and UWUA Local 121's ("UWUA") August 14th request to issue its final set of discovery requests, which exceeds 40 in total, to TAWC.¹

Finally, the Company reserves its right to object to future requests by the UWUA to serve additional written discovery in this docket.

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

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

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

¹ The Company reserves the right to substantively object to each request submitted by the UWUA on August 14, 2024.