

September 12, 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 September 12, 2024 at 1:18 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 Jones:

On July 30, 2024, Tennessee-American Water Company submitted *Response No. 2-13 to Consumer Advocate's Second Set of Discovery Requests* in the above-captioned matter. This response has three (3) subparts, a, b, and c. The responses to subparts a and b were submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. While the response to subpart c should have been submitted as **CONFIDENTIAL INFORMATION**, inadvertently it was not. Therefore, attached for filing please find *Tennessee-American Water Company's Revised Response No. 2-13 to Consumer Advocate's Second Set of Discovery Requests*, which is being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic **CONFIDENTIAL** version of Response No. 2-13 is attached.

For the foregoing reasons, we respectfully request that the response to Consumer Advocate's Request No. 2-13 submitted on July 30, 2024, be immediately removed from TPUC's website and replaced with the attached public version. Response No. 2-13 appears on page 124 of the public PDF filed on July 30, 2024.

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

Attachment

cc: Bob Lane, TAWC
Shilina Brown, Consumer Advocate Division
Victoria Glover, Consumer Advocate Division
Phillip Noblett, City of Chattanooga
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**TENNESSEE AMERICAN WATER COMPANY
TENNESSEE PUBLIC UTILITY COMMISSION
DOCKET NO. 24-00032
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Robert Prendergast

Question:

2-13. Provide a copy of the following TAWC job descriptions as referenced in the File

<TAWC 2024 Rate Case – Labor Exhibit-Confidential.xlsx>:

- a. President;
- b. Manager External Affairs; and
- c. For each position, provide the labor charges by account(s) as recorded in 2023.

Revised Response:

- a. Please see TAW_R_CADDR2_013_073024_CONFIDENTIAL Attachment 2.
- b. Please see TAW_R_CADDR2_013_073024_CONFIDENTIAL Attachment.
- c. Please see TAW_R_CADDR2_013_073024_CONFIDENTIAL Attachment 3.

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:

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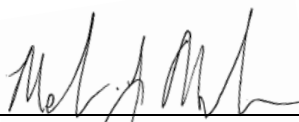
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Union Counsel

This the 12th day of September 2024.



Melvin J. Malone