

BUTLER | SNOW

September 27, 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 27, 2024 at 1:20 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:

Attached for filing please find *Tennessee-American Water Company's Discovery Requests to the City of Chattanooga* in the above-captioned matter.

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

Attachment

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

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**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

**TENNESSEE-AMERICAN WATER COMPANY’S DISCOVERY REQUESTS
TO THE CITY OF CHATTANOOGA**

Tennessee-American Water Company (“TAWC”) respectfully submits the following discovery requests to the City of Chattanooga (“Chattanooga”). Pursuant to the Order Establishing Procedural Schedule, the responses are to be produced at the office of the undersigned counsel, Melvin J. Malone, at Butler Snow LLP, 150 3rd Avenue South, Suite 1600, Nashville, Tennessee 37201, on October 9, 2024.

Instructions

As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to Chattanooga, its witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these discovery requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if Chattanooga receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

C. To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self-evident to a person not familiar with the document or file.

E. If Chattanooga has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for TAWC as soon as possible.

F. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

G. In the event any document requested has been destroyed or transferred beyond the control of Chattanooga or any of its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer TAWC to the record where the document is located.

DISCOVERY REQUEST NO. 1:

To the extent not previously provided, please provide electronic copies (on USB) of all tables, charts, diagrams, schedules, and exhibits (collectively, “Exhibits”) contained in the testimony of all witnesses for Chattanooga. Please include all workpapers, schedules, underlying computations and supporting documentation used and relied upon by each witness in the preparation of their respective testimony, including the preparation of all Exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.

RESPONSE:

DISCOVERY REQUEST NO. 2:

To the extent not previously provided, please provide copies of all schedules and underlying computations and workpapers developed in the analysis by Chattanooga and/or its witnesses of TAWC’s requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic and forecasted data, and the cost of service model.

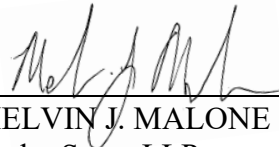
RESPONSE:

DISCOVERY REQUEST NO. 3:

Referencing Mr. Garrett's Direct Testimony at page 40, lines 9-11. Please provide all data that Mr. Garrett reviewed that supports his conclusion that the cost of equity is lower now than it was at the time of the Company's last rate case in 2012.

RESPONSE:

RESPECTFULLY SUBMITTED,

A handwritten signature in dark ink, appearing to read 'Melvin J. Malone', is written over a horizontal line.

MELVIN J. MALONE (BPR #013874)

Butler Snow LLP

150 3rd Avenue South, Suite 1600

Nashville, TN 37201

Tel: (615) 651-6700

Melvin.Malone@butlersnow.com

Attorneys for Tennessee-American Water Company

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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Consumer Advocate Division
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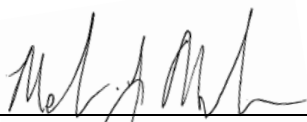
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Union Counsel

This the 27th day of September 2024.



Melvin J. Malone