

September 27, 2024

**VIA ELECTRONIC FILING**

Hon. David Jones, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

Electronically Filed in TPUC Docket Room  
on September 27, 2024 at 2:15 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 Consumer Advocate Division* in the above-captioned matter.

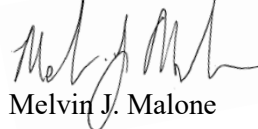
Please note that Request No. 16 contains **CONFIDENTIAL INFORMATION** and is being submitted **UNDER SEAL** as **CONFIDENTIAL** and **PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of these requests are attached.

As set forth in TAWC's separately filed Motion and Memorandum in Support of TAWC's Request to Exceed Forty (40) Discovery Requests, and in keeping with the cooperative approach employed by the parties thus far in the discovery phase of this case, the Consumer Advocate has agreed that it does not object to TAWC submitting more than forty (40) discovery requests to the Consumer Advocate Division in this 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

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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BUTLER SNOW LLP

**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**

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**TENNESSEE-AMERICAN WATER COMPANY’S DISCOVERY REQUESTS  
TO THE CONSUMER ADVOCATE DIVISION**

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Tennessee-American Water Company (“TAWC”) respectfully submits the following discovery requests to the Consumer Advocate Division of the Tennessee Attorney General’s Office (“CAD”). 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 3<sup>rd</sup> 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 the CAD, 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 the CAD 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 the CAD 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 the CAD 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 the CAD. 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 the CAD 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:**

Please provide copies of the complete workpapers, supporting documents, electronic files, including all calculations and formulae intact, and electronic versions of any spreadsheets prepared by Mr. Rothschild to support his Pre-filed Testimony, and Exhibits ALR 1 through ALR 5.

**RESPONSE:**

**DISCOVERY REQUEST NO. 4:**

Please provide complete copies of all cited works referenced in Mr. Rothschild's Pre-filed Testimony.

**RESPONSE:**

**DISCOVERY REQUEST NO. 5:**

Please provide all workpapers in native format, including all calculations and formulae intact, supporting all figures included in Mr. Rothschild's Pre-filed Testimony.

**RESPONSE:**

**DISCOVERY REQUEST NO. 6:**

Please provide a copy or link to each of the five most recent pre-filed testimonies and exhibits, outside of Docket No. 24-00032, in which Mr. Rothschild testified regarding rate of return or cost of equity.

**RESPONSE:**

**DISCOVERY REQUEST NO. 7:**

Please provide all data used to develop the Option-Implied analyses performed by Mr. Rothschild for the RFC Water Proxy Group. The data requested includes all workpapers that demonstrate the daily option-implied betas that were relied upon to develop his analysis.

**RESPONSE:**

**DISCOVERY REQUEST NO. 8:**

Please provide all regulatory decisions of which Mr. Rothschild is aware where the regulatory commission specifically endorsed the use of option implied beta coefficients.

**RESPONSE:**

**DISCOVERY REQUEST NO. 9:**

Referencing Mr. Rothschild's Pre-filed Testimony at page 65 lines 5-6, please provide in native electronic format, with formulas, the calculation of Mr. Rothschild's "historical blended" beta.

**RESPONSE:**

**DISCOVERY REQUEST NO. 10:**

Referencing Mr. Rothschild's Pre-filed Testimony at page 80 lines 2-7, please provide in native electronic format, with formulas, the calculation of Mr. Rothschild's "regression analysis of dozens of utility companies."

**RESPONSE:**

**DISCOVERY REQUEST NO. 11:**

Please provide all regulatory decisions of which Mr. Rothschild is aware where the regulatory commission specifically endorsed the use of a DCF model employing the [b x r] method.

**RESPONSE:**

**DISCOVERY REQUEST NO. 12:**

Please provide all data used to develop the “MRP” sheet in Mr. Rothschild’s file “2024.08.31 - TAWC Cost of Capital (RFC Water PG).xlsx.

**RESPONSE:**

**DISCOVERY REQUEST NO. 13:**

Referencing Mr. Rothschild’s Pre-filed Testimony at page 37 lines 14-15, please provide all documents or data supporting Mr. Rothschild’s statement that “Leading scholars on the topic have determined that investors generally demand an MRP of 4.0% on average.”

**RESPONSE:**

**DISCOVERY REQUEST NO. 14:**<sup>1</sup>

This request relates to file AB-1 Attrition Adjustments, tab Non Production Costs, from page 4 of Consumer Advocate Witness Alex Bradley. If you are unable to confirm as requested in the below subparts, please explain your answer.

- a. Please confirm that the below chart’s subtotal, which is taken from Lines 1-5 of the Non Production Costs Tab, is correct and ties to the total for each year reflected in the Miscellaneous tab of file AB-1 Attrition Year Adjustments.

| Per AB-1 Attrition Adjustments, tab Non Production Costs |                      |                                      |             |             |             |             |             |
|--|----------------------|--------------------------------------|-------------|-------------|-------------|-------------|-------------|
| O&M Expense Category                                     | Detail               | Inflation Category                   | 2019        | 2020        | 2021        | 2022        | 2023        |
| Miscellaneous Expense                                    | Employee Related     | General Consumer Price Index ("CPI") | \$232,494   | \$183,014   | \$43,408    | \$172,178   | \$196,355   |
| Miscellaneous Expense                                    | Building Maintenance | Maintenance                          | 200,508     | 261,192     | 274,157     | 338,059     | 307,330     |
| Miscellaneous Expense                                    | Office Supplies      | Office Supplies and Stationery       | 230,681     | 248,712     | 215,546     | 187,941     | 159,833     |
| Miscellaneous Expense                                    | Miscellaneous        |                                      | 617,142     | 482,211     | 851,250     | 780,397     | 553,486     |
| Miscellaneous Expense                                    | Postage              | Postage, Printing, and Stationery    | 14,523      | 8,913       | 18,240      | 19,056      | 13,211      |
|  |                      |                                      |             |             |             |             |             |
|  |                      |                                      | \$1,295,348 | \$1,184,043 | \$1,402,601 | \$1,497,630 | \$1,230,215 |

**RESPONSE:**

<sup>1</sup> Discovery Request Nos. 14 and 15 reference and relate to the AB-1 Attrition Adjustments.xlsx on page 4 of Consumer Advocate Witness Alex Bradley.

- b. Please confirm that line 6 of the Non Production Costs Tab, Telecommunication Expense, ties to total for each year reflected in the Telecom Tab of file AB-1 Attrition Year Adjustments.

**RESPONSE:**

- c. Please confirm that line 8 of the Non Production Costs Tab, Rents, ties to the total for each year reflected in the Rent tab of file AB-1 Attrition Year Adjustments.

**RESPONSE:**

- d. Please confirm that line 9 of the Non Production Costs Tab, Contract Services, ties to total for each year reflected in the Contract Services Tab of file AB-1 Attrition Year Adjustments.

**RESPONSE:**

- e. Please confirm that line 10 of the Non Production Costs Tab, Customer Accounting, ties to total for each year reflected in the Customer Accounting Tab of file AB-1 Attrition Year Adjustments.

**RESPONSE:**

- f. Please confirm that line 7 of the Non Production Costs Tab, Maintenance Supplies, Services, Building Maintenance and Services, does NOT tie to total for each year reflected in the Maintenance Tab of file AB-1 Attrition Year Adjustments.

**RESPONSE:**

- g. Please confirm that the below chart reflects the amounts from the file AB-1-Attrition Adjustments.

| O&MExpense Category                                      | Detail | Inflation Category | 2019        | 2020        | 2021        | 2022        | 2023        |
|--|--------|--------------------|-------------|-------------|-------------|-------------|-------------|
| Per AB-1 Attrition Adjustments, tab Non Production Costs |        |                    |             |             |             |             |             |
| Maintenance Supplies, Services, Building Maintenance     |        |                    | \$1,541,144 | \$1,847,023 | \$2,098,957 | \$1,980,575 | \$1,526,981 |
| Per AB-1 Attrition Adjustments, tab Maintenance          |        |                    | 1,340,636   | 1,585,831   | 1,824,800   | 1,642,516   | 1,219,651   |
|  |        |                    |             |             |             |             |             |
|  |        | Variance           | \$200,508   | \$261,192   | \$274,157   | \$338,059   | \$307,330   |

**RESPONSE:**

- h. Please confirm that the variance in question in subsection (g) above matches the amount as shown on the Non Production Costs tab line 2 for Miscellaneous Expense, Building Maintenance (also shown in question subsection (a) above).



**RESPONSE:**

- i. Please confirm that line 7 as reflected in the Non Production Costs tab of AB-1 Attrition Adjustments is overstated.

**RESPONSE:**

- j. Please confirm that removing the variance costs reflected in subsection (g) above would change the 4 year Compound Annual Growth Rate to reflect the below amount.

| Line | O&M Expense Category  | Detail               | Inflation Category    | Company<br>Proposed 3-<br>Year Annual<br>CPI Percent<br>Change | 4 Year<br>Compound<br>Annual<br>Growth Rate | 2019        | 2020        | 2021        | 2022        | 2023        |
|------|---|----------------------|-----------------------|--|---|-------------|-------------|-------------|-------------|-------------|
| 1    | Miscellaneous Expense   | Employee Related     | General Consumer Pr   | 6.03%  | 1.18%                                       | \$232,494   | \$183,014   | \$43,408    | \$172,178   | \$196,355   |
| 2    | Miscellaneous Expense   | Building Maintenance | Maintenance           | 4.05%  | 1.18%                                       | 200,508     | 261,192     | 274,157     | 338,059     | 307,330     |
| 3    | Miscellaneous Expense   | Office Supplies      | Office Supplies and S | 2.08%  | 1.18%                                       | 230,681     | 248,712     | 215,546     | 187,941     | 159,833     |
| 4    | Miscellaneous Expense   | Miscellaneous        |                       | 6.03%  | 1.18%                                       | 617,142     | 482,211     | 851,250     | 780,397     | 553,486     |
| 5    | Miscellaneous Expense   | Postage              | Postage, Printing, an | 4.02%  | 1.18%                                       | 14,523      | 8,913       | 18,240      | 19,056      | 13,211      |
| 6    | Telecommunications Expense  |                      | General Consumer Pr   | 6.03%  | 1.18%                                       | 195,715     | 226,375     | 224,258     | 269,244     | 313,503     |
| 7    | Maintenance Supplies, Services, Building Maintenance and Services |                      | Maintenance           | 4.05%  | 1.18%                                       | 1,340,636   | 1,585,831   | 1,824,800   | 1,642,516   | 1,219,651   |
| 8    | Rents   |                      | Rent                  | 5.94%  | 1.18%                                       | 7,821       | 44,291      | 58,833      | 12,888      | 8,429       |
| 9    | Contract Services   |                      | Professional Services | 2.54%  | 1.18%                                       | 942,493     | 1,123,629   | 878,925     | 972,334     | 990,301     |
| 10   | Customer Accounting   |                      | Professional Services | 2.54%  | 1.18%                                       | 457,704     | 133,360     | 99,860      | 89,132      | 84,683      |
| 11   |   | Totals:              |                       |  |   | \$4,239,717 | \$4,297,528 | \$4,489,278 | \$4,483,744 | \$3,846,782 |

**RESPONSE:**

**DISCOVERY REQUEST NO. 15:**

This request relates to file AB-1 Attrition Adjustments, tab Customer Accounting, from page 4 of Consumer Advocate Witness Alex Bradley. If you are unable to confirm as requested in the below subparts, please explain your answer.

- a. Does Mr. Bradley believe the CAGR is an accurate forecast for all costs in all instances?

**RESPONSE:**

- b. Please confirm that the below chart, which is taken from the Customer Accounting Tab in file AB-1 Attrition Adjustments, is correct so that CAGR can be applied. If it is not, please identify the corrections that must be made.

| Line Description    | Account No. | Account Name                               | BLS Inflation Factor | 2019 Total | 2020 Total | 2021 Total | 2022 Total | 2023 Total |
|---------------------|-------------|--|----------------------|------------|------------|------------|------------|------------|
| Customer Accounting | 52501500    | Misc Oper - Customer Accounting            | 2.54%                | \$5,689    | \$18,091   | (\$2,736)  | \$0        | (\$310)    |
| Customer Accounting | 52501510    | Misc Oper - Customer Accounting Mr Read    | 2.54%                | -          | -          | -          | -          | -          |
| Customer Accounting | 52501520    | Misc Oper - Customer Accounting Cust Serv  | 2.54%                | -          | -          | -          | -          | -          |
| Customer Accounting | 52510015    | Bank Service Charges - Customer Accounting | 2.54%                | 117,035    | 116,832    | 102,944    | 89,511     | 86,070     |
| Customer Accounting | 52514906    | Customer Education - Bill Inserts          | 2.54%                | 2,797      | -          | -          | -          | -          |
| Customer Accounting | 52520000    | Collection Agencies                        | 2.54%                | 332,182    | (1,563)    | (348)      | (379)      | (1,077)    |
|                     |             | Total:                                     |                      | \$457,704  | \$133,360  | \$99,860   | \$89,132   | \$84,683   |

**RESPONSE:**

- c. Pursuant to subsection (b) above, if Mr. Bradley did not identify the \$332,182 in account 52520000 Collection Agencies as being out of place or in need of an adjustment, please fully explain why no adjustment would be made to this line for the year 2019.

**RESPONSE:**

- d. In the 2019 column of the chart in subsection (b) above, the Collection Agencies line item represents 72.58% of the total costs in Customer Accounting. Yet, in 2020 through 2023, the Collection Agencies amounts to (1.17%), (0.35%) (0.43%) and (1.27%), respectively. Please explain why an adjustment is not needed when the numbers reflect over an approximately \$332,000 reduction from 2019.

**RESPONSE:**

- e. Does Mr. Bradley assume that the \$332,182 in subsection (c) above does not impact his proposed CAGR?

**RESPONSE:**

- f. Please confirm that if the \$332,182 in subsection (c) above were removed from the analysis, the CAGR would be 3.27% as reflected in the chart below. Please note that the Maintenance expense in line 7 reflects the corrected amount, which excludes the double counting of line 2 from the tab Non Production Costs.

| Line | O&M Expense Category  | Detail               | Inflation Category    | Company Proposed 3-Year Annual CPI Percent Change | 4 Year Compound Annual Growth Rate | 2019        | 2020        | 2021        | 2022        | 2023        |
|------|---|----------------------|-----------------------|---|------------------------------------|-------------|-------------|-------------|-------------|-------------|
| 1    | Miscellaneous Expense   | Employee Related     | General Consumer Pr   | 6.03%   | 3.27%                              | \$232,494   | \$183,014   | \$43,408    | \$172,178   | \$196,355   |
| 2    | Miscellaneous Expense   | Building Maintenance | Maintenance           | 4.05%   | 3.27%                              | 200,508     | 261,192     | 274,157     | 338,059     | 307,330     |
| 3    | Miscellaneous Expense   | Office Supplies      | Office Supplies and S | 2.08%   | 3.27%                              | 230,681     | 248,712     | 215,546     | 187,941     | 159,833     |
| 4    | Miscellaneous Expense   | Miscellaneous        |                       | 6.03%   | 3.27%                              | 617,142     | 482,211     | 851,250     | 780,397     | 553,486     |
| 5    | Miscellaneous Expense   | Postage              | Postage, Printing, an | 4.02%   | 3.27%                              | 14,523      | 8,913       | 18,240      | 19,056      | 13,211      |
| 6    | Telecommunications Expense  |                      | General Consumer Pr   | 6.03%   | 3.27%                              | 195,715     | 226,375     | 224,258     | 269,244     | 313,503     |
| 7    | Maintenance Supplies, Services, Building Maintenance and Services |                      | Maintenance           | 4.05%   | 3.27%                              | 1,340,636   | 1,585,831   | 1,824,800   | 1,642,516   | 1,219,651   |
| 8    | Rents   |                      | Rent                  | 5.94%   | 3.27%                              | 7,821       | 44,291      | 58,833      | 12,888      | 8,429       |
| 9    | Contract Services   |                      | Professional Services | 2.54%   | 3.27%                              | 942,493     | 1,123,629   | 878,925     | 972,334     | 990,301     |
| 10   | Customer Accounting   |                      | Professional Services | 2.54%   | 3.27%                              | 125,521     | 133,360     | 99,860      | 89,132      | 84,683      |
| 11   |   | Totals:              |                       |   |                                    | \$3,907,534 | \$4,297,528 | \$4,489,278 | \$4,483,744 | \$3,846,782 |

**RESPONSE:**

**CONFIDENTIAL – DISCOVERY REQUEST NO. 16:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**RESPONSE:**

**DISCOVERY REQUEST NO. 17:**

Referencing Mr. Dittemore’s Pre-filed Testimony at page 31, lines 1-11, Mr. Dittemore uses the term “lost and unaccounted for water.” If “lost and unaccounted for water” is not “non-revenue water,” please provide a definition of “lost and unaccounted for water” as used by Mr. Dittemore.

**RESPONSE:**

**DISCOVERY REQUEST NO. 18:**

Please provide the source and support for Mr. Dittemore’s definition of “lost and unaccounted for water.”

**RESPONSE:**

**DISCOVERY REQUEST NO. 19:**

Please provide a method for calculating “unaccounted for water.”

**RESPONSE:**

**DISCOVERY REQUEST NO. 20:**

Please provide a method for calculating “lost water.”

**RESPONSE:**

**DISCOVERY REQUEST NO. 21:**

Please provide the source for each of these definitions in the preceding two requests.

**RESPONSE:**

**DISCOVERY REQUEST NO. 22:**

Referencing Mr. Dittemore’s Pre-filed Testimony at page 31, lines 1-11, Mr. Dittemore uses the term non-revenue water (“NRW”). Please provide a definition of “non-revenue water” as used by Mr. Dittemore as well as the source and support of such definition.

**RESPONSE:**

**DISCOVERY REQUEST NO. 23:**

Please provide a method of calculating “non-revenue water” under Mr. Dittemore’s definition.

**RESPONSE:**

**DISCOVERY REQUEST NO. 24:**

Referencing Mr. Dittmore's Pre-filed Testimony on page 31, lines 9-10, please provide the source and support for the statement "it is not possible to definitively make a numeric distinction between lost water and NRW."

**RESPONSE:**

**DISCOVERY REQUEST NO. 25:**

Referencing his testimony, is it Mr. Dittmore contention that "lost and unaccounted for water" cannot be calculated or estimated according to industry guidelines? If so, please provide the source and support for this conclusion.

**RESPONSE:**

**DISCOVERY REQUEST NO. 26:**

What does Mr. Dittmore consider a normal or reasonable level of NRW for Tennessee American Water? Please provide the source and support for this conclusion.

**RESPONSE:**

**DISCOVERY REQUEST NO. 27:**

Does Mr. Dittmore consider water released while flushing portions of the water system to maintain water quality "lost water" or "unaccounted for water"?

**RESPONSE:**

**DISCOVERY REQUEST NO. 28:**

Does Mr. Dittmore consider water that is released to test fire hydrants to be “lost water” or “unaccounted for water”?

**RESPONSE:**

**DISCOVERY REQUEST NO. 29:**

Does Mr. Dittmore consider water usage that is metered, but not billed, “lost water” or “unaccounted for water”?

**RESPONSE:**

**DISCOVERY REQUEST NO. 30:**

Refer to the table on page 4 of Alex Bradley’s Pre-filed Testimony and refer to his Testimony on page 5, lines 12-18. Please explain the reason the CAD calculated Attrition Period Contract Services by first beginning “with the Consumer Advocate Adjusted Test Period amount of \$796,882” as opposed to first beginning with the Test Period amounts for the accounts making up this expense or TAWC’s Adjusted Test Period Amount for this expense item.

**RESPONSE:**

**DISCOVERY REQUEST NO. 31:**

Refer to the table on page 6 of Alex Bradley’s Pre-filed Testimony and refer to his Testimony on pages 7 and 8. Please identify and explain the basis, components and accounts that make up the Consumer Advocate’s “Business Development and External Affairs & Public Policy”

item as referenced on pages 7 and 8 of Alex Bradley's Pre-filed Testimony, and identify how the CAD developed its "proposed Test Period Adjustments for Business Development and External Affairs & Public Policy" as utilized by the CAD to calculate its adjustments to the Contract Services, Labor, Benefits, Other Benefits, and Other Insurance components of TAWC's Attrition Period Support Services line item. Please also identify any differences between the "Business Development and External Affairs & Public Policy" item and the "External Affairs & Public Policy" item as referenced in application to Rents and Transportation on page 8 of Alex Bradley's Pre-filed Testimony.

**RESPONSE:**

**DISCOVERY REQUEST NO. 32:**

Refer to the table on page 9 of Alex Bradley's Pre-filed Testimony and refer to his Testimony on page 9, lines 14-20. Please explain why 2019 was selected, and not some other year or average of years, to compare to TAWC's Proposed Adjusted Test Period to develop the CAD's Support Services compound annual growth factor of 3.26%.

**RESPONSE:**

**DISCOVERY REQUEST NO. 33:**

Refer to page 18, lines 1-21 of Alex Bradley's Pre-filed Testimony. Please state whether the CAD is taking the position that the Commission does not have authority to approve TAWC's replacement of customer-owned lead service lines and, if so, identify all Tennessee statutes, regulations and precedent that supports that position.

**RESPONSE:**

**DISCOVERY REQUEST NO. 34:**

Refer to page 5, lines 3-13 of William Novak's Pre-filed Testimony. Please identify the "known and reasonably anticipated events" that were the basis of adjustments utilized by the CAD to calculate an attrition year rate base of \$297.8 million. Please identify and produce all related workpapers.

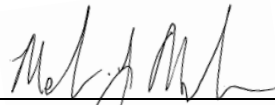
**RESPONSE:**

**DISCOVERY REQUEST NO. 35:**

Refer to page 7, line 2 through page 8, line 5 of William Novak's Pre-filed Testimony. Please explain why a feasibility and reasonability analysis based on a four-year average was utilized to analyze Plant in Service.

**RESPONSE:**

RESPECTFULLY SUBMITTED,



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MELVIN J. MALONE (BPR #013874)  
Butler Snow LLP  
150 3<sup>rd</sup> 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:

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](mailto:Shilina.Brown@ag.tn.gov)

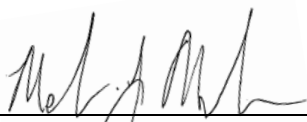
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This the 27<sup>th</sup> day of September 2024.

  
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