

# BUTLER | SNOW

October 16, 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 October 16, 2024 at 1:37 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 Supplemental Response No. 1-18 to First Discovery Requests of the Utility Workers Union of America, AFL-CIO, and UWUA Local 121* 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**

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**TENNESSEE-AMERICAN WATER COMPANY’S SUPPLEMENTAL RESPONSE  
NO. 1-18 TO FIRST SET OF DISCOVERY REQUESTS OF  
UTILITY WORKERS UNION OF AMERICA, AFL-CIO, AND UWUA LOCAL 121**

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Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Supplemental Response No. 1-18 to First Set of Discovery Requests propounded by Utility Workers Union of America, AFL-CIO, and UWUA Local 121 (“UWUA”).

**GENERAL OBJECTIONS**

1. TAWC objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.

2. TAWC objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission (“TPUC” or “Authority”).

3. The specific responses set forth below are based on information now available to TAWC, and TAWC reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. TAWC objects to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. TAWC objects to each request to the extent it seeks information outside TAWC's custody or control.

6. TAWC's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of TAWC's General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. TAWC objects to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.

8. TAWC objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. TAWC does not waive any previously submitted objections to UWUA's discovery requests.

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

**Responsible Witness:** Robert Prendergast

**Question:**

18. With reference to TAWC's response to Discovery Request 1-20 from the Consumer Advocate Division, please supplement TAWC's response by providing the year-end number of TAWC employees for each calendar year since and including 2012, categorized by union hourly employees, non-union hourly employees, and exempt employees.

**Supplemental Response:**

There was an error in the table provided in the original response filed on July 30, 2024 to this discovery request 1-18 relating to employee counts in the years 2012-2018. Specifically, the employee counts for the years 2012 through 2018 omitted employees that were no longer in the employment of the Company. Therefore, the table below has been updated with the correct employee staffing levels covering 2012-2018.

Please see the table below for the year-end number of TAWC employees for each calendar year since and including 2012.

Yearend Employment	Union	Non-Union Hourly	Exempt
2012	71	4	20
2013	69	11	21
2014	68	10	23
2015	69	11	23
2016	68	12	24
2017	69	11	23
2018	74	12	27
2019	70	14	23
2020	73	13	25
2021	67	14	25
2022	64	14	24
2023	64	14	23

**Original Response July 30, 2024:**

Please see the table below for the year-end number of TAWC employees for each calendar year since and including 2012.

Year end Employment	Union	Non-Union Hourly	Exempt
2012	42	5	15
2013	42	11	17
2014	46	13	19
2015	50	13	20
2016	54	14	21
2017	61	14	22
2018	71	16	24
2019	70	14	23
2020	73	13	25
2021	67	14	25
2022	64	14	24
2023	64	14	23

## 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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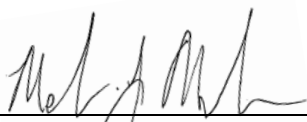
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*Union Counsel*

This the 16<sup>th</sup> day of October 2024.

  
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Melvin J. Malone