

# BUTLER | SNOW

November 1, 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 November 1, 2024 at 1:41 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:

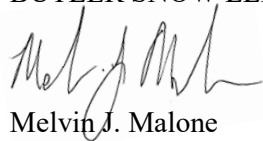
Attached for filing is a substitute page 17 to the *Rebuttal Testimony of John Watkins*, which was filed on October 22, 2024, in the above-captioned matter.

For ease of reference, the correction to the *Rebuttal Testimony of John Watkins* is as follows: on substitute page 17, line 5, the amount is changed from \$27,544.50 to \$19,574.50; and line 7, the amount is changed from \$28,823.50 to \$36,793.50. With this correction on substitute page 17, the corrected sentence now reads: "If the Commission wishes to adjust the amount, then it should make an adjustment of \$19,574.50 which is the variance between Docket No. 19-00103 amount of \$56,368 and the adjustment to the annual Capital Rider amount of \$36,793.50 calculated above."

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  
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BUTLER SNOW LLP

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| 2023          | 19-00103           | CRRs              | Recon              | PCOP               | TOTALS              |
|---------------|--------------------|-------------------|--------------------|--------------------|---------------------|
| January       | \$8,372.00         | \$0.00            | \$0.00             | \$6,391.75         | <b>\$14,763.75</b>  |
| February      | 1,196.00           |                   | 4,341.00           | 3,276.00           | <b>8,813.00</b>     |
| March         | 2,392.00           | 1,790.50          | 646.50             | 1,790.50           | <b>6,619.50</b>     |
| April         | 2,496.00           |                   | 6,188.00           | 2,080.00           | <b>10,764.00</b>    |
| May           | 8,788.00           | 2,288.00          | 9,724.00           | 4,004.00           | <b>24,804.00</b>    |
| June          | 6,032.00           |                   | 10,907.50          | 260.00             | <b>17,199.50</b>    |
| July          | 5,148.00           |                   | 4,160.00           | 260.00             | <b>9,568.00</b>     |
| August        | 7,176.00           |                   | 3,432.00           |                    | <b>10,608.00</b>    |
| September     | 8,528.00           |                   | 572.00             |                    | <b>9,100.00</b>     |
| October       | 2,288.00           |                   | 208.00             |                    | <b>2,496.00</b>     |
| November      |                    |                   | 3,172.00           |                    | <b>3,172.00</b>     |
| December      | 3,952.00           |                   |                    |                    | <b>3,952.00</b>     |
| <b>TOTALS</b> | <b>\$56,368.00</b> | <b>\$4,078.50</b> | <b>\$43,351.00</b> | <b>\$18,062.25</b> | <b>\$121,859.75</b> |

**Q. WHAT DOES THE COMPANY PROPOSE?**

A. The Company proposes that Mr. Dittmore's adjustment to Contracted Services be rejected and the Company's proposed costs be included. If the Commission wishes to adjust the amount, then it should make an adjustment of \$19,574.50 which is the variance between Docket No. 19-00103 amount of \$56,368 and the adjustment to the annual Capital Rider amount of \$36,793.50 calculated above. This would properly reflect the filing of the annual Capital Rider from the base year and then inflate this by the Company's proposed inflationary amounts.

**V. TELECOMMUNICATIONS**

**Q. DID THE CAD PROPOSE ANY ADJUSTMENTS TO TELECOMMUNICATIONS EXPENSE?**

A. Yes, Mr. Bradley proposes to use his nonproduction costs growth factor, page 10, lines 15-21.

## 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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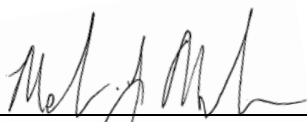
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*Union Counsel*

This the 1<sup>st</sup> day of November 2024.

  
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Melvin J. Malone