

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

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|---|---|----------------------------|
| IN RE: |) | |
| |) | |
| PETITION OF TENNESSEE-AMERICAN |) | |
| WATER COMPANY TO MODIFY TARIFF, |) | |
| CHANGE AND INCREASE CHARGES, FEES, |) | DOCKET NO. 24-00032 |
| AND RATES, AND FOR APPROVAL OF A |) | |
| GENERAL RATE INCREASE |) | |

**MOTION FOR LEAVE TO FILE TWO ADDITIONAL DATA REQUESTS
AND TO SET EXPEDITED SCHEDULE FOR RESPONSE**

Intervenor, the City of Chattanooga ("Chattanooga"), moves for leave to file and serve upon Petitioner, Tennessee American Water Company ("TAWC"), two additional data requests and to set an expedited schedule for TAWC's response to those requests.

Counsel for TAWC agreed with counsel for Chattanooga to provide, without the necessity for supplemental data requests, (1) copies of bill impacts for TAWC's 20 largest customers reflecting the effect of TAWC's proposed rate changes and (2) analysis of the relative impacts on TAWC customers of TAWC's proposed consolidation of rates among its rate areas as compared to TAWC's proposed shift of revenue recovery from fixed charges to variable charges. The agreement of counsel for TAWC was not contingent upon settlement or any other event. Prior to the status conference on October 30, 2024, and again on Thursday afternoon, October 31, 2024, counsel for TAWC assured counsel for Chattanooga that the promised information would be provided by TAWC without the necessity to file a motion for leave.

Regretfully, after further follow-up on the afternoon of Tuesday, November 5, 2024, counsel for TAWC announced that the promised information would not be provided.


The promised information is relevant and is of significant interest to the parties and to the Commission as the Commission considers TAWC's proposed rate design changes. This motion

has been filed promptly after counsel for TAWC reported that TAWC would not abide by its agreement to voluntarily produce the promised information.

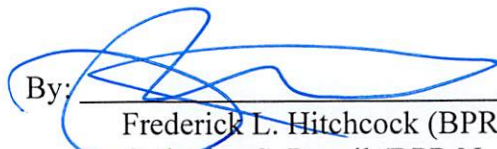
For these reasons, Intervenor, the City of Chattanooga, respectfully requests that it be granted leave to file two additional data requests addressing the two categories of promised information and that TAWC be ordered to provide the responsive information by Monday, November 11, 2024.

Respectfully Submitted,

CITY OF CHATTANOOGA

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CERTIFICATE OF SERVICE

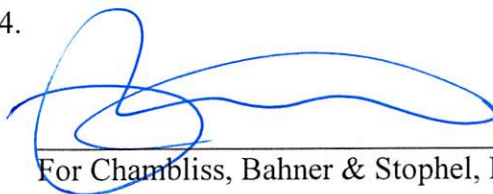
I hereby certify that a true and correct copy of the foregoing was served upon the following persons via U.S. Mail, with a courtesy copy by electronic mail:

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This the 6th day of November, 2024.



For Chambliss, Bahner & Stophel, PC