

November 13, 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 November 13, 2024 at 12:26 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 Response to Supplemental Discovery Requests of the City of Chattanooga* in the above-captioned matter.

Please note that the Attachments to Supplemental Response No. 1 contain **CONFIDENTIAL INFORMATION** and is being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**.

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

Attachments

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

**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 RESPONSE TO
SUPPLEMENTAL DISCOVERY REQUESTS OF THE CITY OF CHATTANOOGA**

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Response to Supplemental Discovery Requests propounded by the City of Chattanooga (“Chattanooga”).

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 Chattanooga's discovery requests.

**TENNESSEE AMERICAN WATER COMPANY
TENNESSEE PUBLIC UTILITY COMMISSION
DOCKET NO. 24-00032
SUPPLEMENTAL DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Robert Lane

Question:

1. Please provide copies of bill impacts for TAWC's 20 largest customers reflecting the effect of TAWC's proposed rate changes.

Response: The Company did not perform a bill impact analysis for all 20 of the largest customers. Such an analysis was only performed for those customers who met with the Company to discuss the rate case. Attached are the analysis performed with regard to those customers. Please see Confidential Attachments 1 through 7.

**TENNESSEE AMERICAN WATER COMPANY
TENNESSEE PUBLIC UTILITY COMMISSION
DOCKET NO. 24-00032
SUPPLEMENTAL DISCOVERY REQUEST OF THE
CITY OF CHATTANOOGA**

Responsible Witness: Heath Brooks

Question:

2. Please provide TAWC's 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.

Response:

1. Please refer to TAW_R_COCDR4_002_111324_Attachment 1 for the revenue shift between rate zones due to consolidation. Rate consolidation results in the Chattanooga rate zone receiving a 21.0% increase. When compared to the originally filed overall retail revenue increase of 19.2%, consolidation results in an additional increase of 1.8% for the Chattanooga rate zone from what it would be under an overall increase of 19.2% for each rate zone.
2. Please refer to TAW_R_COCDR4_002_111324_Attachment 2 for the revenue shift between fixed charges and variable charges.

Tennessee American Water Company
TAW_R_COCDRA_002_111324_Attachment 1

| Rate Zone | | Current Revenue | Proposed Revenue | Revenue at Equal Increase Percentage | | Difference Due to Consolidation | Consolidation Impact |
|--------------------|--|-----------------|------------------|--------------------------------------|--|---------------------------------|----------------------|
| Chattanooga | | \$ 64,425,409 | \$ 77,951,818 | \$ 76,808,649 | | \$ 1,143,169 | 1.77% |
| Lakeview | | \$ 1,396,564 | \$ 1,515,790 | \$ 1,664,998 | | \$ (149,209) | -10.68% |
| Lookout Mountain | | \$ 2,012,744 | \$ 2,163,330 | \$ 2,399,615 | | \$ (236,285) | -11.74% |
| Suck Creek | | \$ 195,185 | \$ 135,908 | \$ 232,702 | | \$ (96,794) | -49.59% |
| Whitwell (Inside) | | \$ 426,030 | \$ 477,429 | \$ 507,917 | | \$ (30,488) | -7.16% |
| Whitwell (Outside) | | \$ 1,352,749 | \$ 1,318,261 | \$ 1,612,761 | | \$ (294,501) | -21.77% |
| Jasper Highlands | | \$ 698,451 | \$ 496,808 | \$ 832,701 | | \$ (335,893) | -48.09% |
| Total | | | \$ 84,059,343 | \$ 84,059,343 | | \$ (0) | |

*Based on original revenue requirement which requires a 19.22% increase to retail revenue recovery

*Excludes other operating revenues

| | Current | | Proposed | | Current | | Proposed | |
|--------------------|---------------|---------------|---------------|---------------|---------|------------|----------|------------|
| | Fixed | Volumetric | Fixed | Volumetric | Fixed | Volumetric | Fixed | Volumetric |
| Chattanooga | \$ 30,972,817 | \$ 33,452,592 | \$ 32,462,747 | \$ 45,489,070 | 48.1% | 51.9% | 41.6% | 58.4% |
| Lakeview | \$ 821,828 | \$ 574,735 | \$ 802,663 | \$ 713,127 | 58.8% | 41.2% | 53.0% | 47.0% |
| Lookout Mountain | \$ 687,378 | \$ 1,325,366 | \$ 673,947 | \$ 1,489,383 | 34.2% | 65.8% | 31.2% | 68.8% |
| Suck Creek | \$ 130,449 | \$ 64,737 | \$ 69,923 | \$ 65,984 | 66.8% | 33.2% | 51.4% | 48.6% |
| Whitwell (Inside) | \$ 277,030 | \$ 149,000 | \$ 237,477 | \$ 239,952 | 65.0% | 35.0% | 49.7% | 50.3% |
| Whitwell (Outside) | \$ 863,738 | \$ 489,011 | \$ 635,032 | \$ 683,229 | 63.9% | 36.1% | 48.2% | 51.8% |
| Jasper Highlands | \$ 468,136 | \$ 230,315 | \$ 333,104 | \$ 163,704 | 67.0% | 33.0% | 67.0% | 33.0% |
| TAWC Total | \$ 34,221,375 | \$ 36,285,756 | \$ 35,214,894 | \$ 48,844,449 | 49% | 51% | 42% | 58% |

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DOCKET NO. 24-00032

VERIFICATION

STATE OF Tennessee)

COUNTY OF Hamilton)

I, ROBERT C. LANE, being duly sworn, state that I am authorized to testify on behalf of Tennessee-American Water Company in the above-referenced docket, that if present before the Commission and duly sworn, verifies that the data requests and discovery responses are accurate to the best of my knowledge.



ROBERT C. LANE

Sworn to and subscribed before me
this 13th day of November, 2024.


Notary Public

My Commission expires: 2-28-28



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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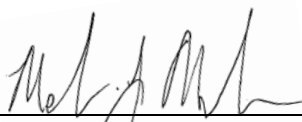
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This the 13th day of November 2024.



Melvin J. Malone