

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

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

**CITY OF CHATTANOOGA'S MOTION FOR LEAVE
TO FILE LIMITED DISCOVERY**

Intervenor, the City of Chattanooga (“Chattanooga”), pursuant to Tenn. Code Ann. § 65-2-102, TPUC Rule 1220-01-02-.11, and Rules 26, 33, and 34 of the *Tennessee Rules of Civil Procedure*, moves for leave to file and serve upon Petitioner, Tennessee-American Water Company (“TAWC”), limited discovery requests on the issue of whether TAWC should be granted recovery of its rate case expenses, and whether these rate case expenses are just and reasonable.

Pursuant to TPUC 1220-01-02-.11, Chattanooga seeks leave of the Hearing Officer by this Motion and the contemporaneously filed Memorandum in Support, for service of limited discovery upon TAWC concerning the issue of rate case expenses.

WHEREFORE, for the foregoing reasons, the City of Chattanooga respectfully requests that it be granted leave to serve and file discovery requests related to TAWC’s request for award of rate case expenses.

Respectfully Submitted,

CITY OF CHATTANOOGA

By: Phillip Noblett by Fulton Permission

Phillip A. Noblett (BPR No. 10074)

City Attorney

Valerie Malueg (BPR No. 23763)

Kathryn McDonald (BPR No. 30950)

Assistant City Attorneys

100 East 11th Street, Suite 200

City Hall Annex

Chattanooga, TN 37402

Telephone: (423) 643-8250

pnoblett@chattanooga.gov

vmalueg@chattanooga.gov

kmcdonald@chattanooga.gov

CHAMBLISS, BAHNER & STOPHEL, P.C.

By: 

Frederick L. Hitchcock (BPR No. 5960)

Liberty Tower

605 Chestnut Street, Suite 1700

Chattanooga, TN 37450

Telephone: (423) 757-0222

Facsimile: (423) 508-1222

rhitchcock@chamblisslaw.com

CERTIFICATE OF SERVICE

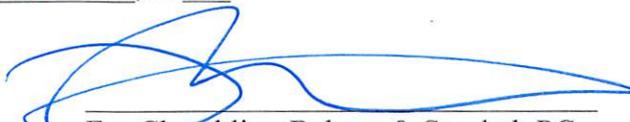
I hereby certify that a true and correct copy of the foregoing was served upon the following persons via U.S. Mail, with a courtesy copy by electronic mail:

Melvin J. Malone
Katherine Barnes
Butler Snow LLP
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
melvin.malone@butlersnow.com
katherine.barnes@butlersnow.com

Shilina B. Brown
Victoria B. Glover
Vance L. Broemel
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
shilina.brown@ag.tn.gov
victoria.glover@ag.tn.gov
vance.broemel@ag.tn.gov

Scott P. Tift
David W. Garrison
Barrett Johnston Martin & Garrison, PLLC
200 31st Avenue North
Nashville, TN 37203
stift@barrettjohnston.com
dgarrison@barrettjohnston.com

This the 30th day of December, 2025.



For Chambliss, Bahner & Stophel, PC