IN THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

Electronically Filed in TPUC Docket Room on August 12, 2026 at 1:02 p.m.

IN 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	)))))	**DOCKET NO. 24-00032**

CITY OF CHATTANOOGA'S FOURTH DISCOVERY REQUESTS TO PETITIONER TENNESSEE AMERICAN WATER COMPANY

Pursuant to the Procedural Order entered by the Administrative Judge, Intervenor, the City of Chattanooga ("Chattanooga") submits the following Fourth Discovery Requests (the "Fourth Requests") to Petitioner, Tennessee American Water Company ("TAWC"). The responses to the Fourth Requests are to be delivered to counsel for Chattanooga by Two o'clock p.m. (central) August 28, 2026.

INSTRUCTIONS AND DEFINITIONS

Chattanooga incorporates by reference the Instructions and Definitions set forth in its Second Discovery Requests to TAWC, as if fully restated in these Requests.

DISCOVERY REQUESTS

1. Identify all rate case expenses claimed by the Company that were incurred before the filing of the Company's Petition. For each such expense, state when the work began, the nature of the work performed, and why the Company contends that the expense should be recoverable from ratepayers.

RESPONSE:

2. Identify and Explain all rate case expenses that the Company incurred after the completion and filing of the Company's Post Hearing Brief on December 10, 2024. Explain why the Company contends that the identified expenses should be recoverable from ratepayers.

RESPONSE:

3. Identify and Explain the portion of the rate case expenses identified in the previous request that was incurred after Chairman Jones' Pre-Filed Motion on the Merits was filed on January 17, 2025. Explain why the Company contends that the identified expenses should be recoverable from ratepayers.

RESPONSE:

4. For each individual time entry on a Butler Snow invoice that includes any redacted information, Explain how the time reported for the entry containing the redacted information benefitted ratepayers instead of the Company. If it is claimed that both ratepayers and the Company benefitted from the time reported for the entry containing the redacted information, Explain how much of the time reported for the entry benefitted ratepayers and how much benefitted the Company. Explain the basis for the allocation.

RESPONSE:

5. Identify all internal (Company employee) time charged to rate case expenses, including the employee's name, title, department, and hourly or annual compensation rate used to calculate the charge, and number of hours charged.

RESPONSE:

6. Explain the methodology used to calculate the labor rate applied to internal employee time charged to this rate case, including whether it includes only direct salary or also overhead, benefits, and other loadings.

RESPONSE:

7. Explain why rate case expenses in excess of the revenue deficiency granted by the Tennessee Public Utility should be allowed.

RESPONSE:

8. Provide the Company's calculation of the amount of rate case expense that it contends is appropriately recoverable from ratepayers after excluding costs that are excessive, duplicative, unnecessary, unreasonable, imprudent, administrative, or attributable to matters unrelated to the Company's revenue requirement.

RESPONSE:

9. Identify and Explain any costs included in rate case expenses for public relations, media, advertising, or communications activities, and describe the specific purpose of each such expenditure.

RESPONSE:

10. Identify and Explain the total expenditures by or on behalf of the Company or any Subsidiary or Affiliate by month for 2023, 2024, 2025, and 2026 for public relations, advertising, or communications activities in Tennessee or accessible to Tennessee residents.

RESPONSE:

11. Identify and Explain each Communication on social media by or on behalf of the Company by date and social media platform for 2023, 2024, 2025, and 2026. For purposes of this request, "Communication" shall include, without limitation, each post, photo, video, comment, or statement, and "social media" shall include, without limitation, Facebook, X (Twitter), Tik Tok, and LinkedIn.

RESPONSE:

12. Identify and Explain each Communication on social media by or on behalf of any Affiliates or Subsidiaries referring to or referencing the Company or any service provided by the Company in Tennessee by date and social media platform for 2023, 2024, 2025, and 2026. For purposes of this request, "Communication" shall include, without limitation, each post, photo, video, comment, or statement, and "social media" shall include, without limitation, Facebook, X (Twitter), Tik Tok, and LinkedIn.

RESPONSE:

13. Identify and Explain all rate case expenses associated with discovery responses, discovery review, preparation of testimony, preparation for hearings, briefing, or other litigation activities. For each category, provide the total hours and costs incurred.

RESPONSE:

14. Identify and Explain all charges of attorneys claimed by the Company in this docket as rate case expenses that involved outlining, specifying, preparing, or revising testimony or exhibits of any actual or potential witness for TAWC and provide the unredacted time entries for all such charges.

RESPONSE:

15. State whether the Company tracks rate case expenses against a budget. If so, produce the budget and any budget-to-actual variance reports for this proceeding.

RESPONSE:

16. Identify and Explain all rate case expenses that the Company has excluded from its request for recovery and explain the criteria used to determine whether an expense was excluded.

RESPONSE:

17. Describe all policies, procedures, guidelines, or internal controls used by the Company to determine whether rate case expenses are reasonable, necessary, prudent, and appropriate for recovery from ratepayers.

RESPONSE:

18. Identify the person or persons responsible for reviewing and approving rate case invoices before those expenses are included in the Company's request for recovery. Describe the review process performed by each person.

RESPONSE:

19. For each invoice submitted by an outside attorney, consultant, accountant, or other professional, state whether the invoice was reviewed for duplicative work, excessive hours, unnecessary work, clerical work, administrative work, or other charges that would not ordinarily be considered appropriate for recovery from ratepayers. If so, Identify the person or persons completing the review, Explain how the review was completed, and Identify and Explain any reductions made.

RESPONSE:

20. Identify and Explain any revisions to any invoice referenced in the previous request that were made as a result of any review described in that request. If no review as described in the previous request was made, Explain why and Identify the person or persons who made the decision not to undertake such a review.

RESPONSE:

21. Identify all travel, lodging, meal, entertainment, mileage, airfare, conference, or similar expenses included in the Company's rate case expense request. For each expense, provide the date, individual incurring the expense, purpose, location, amount, and supporting documentation.

RESPONSE:

22. Identify each expense included in the Company's request that exceeds the amount the Company initially budgeted or estimated for the applicable service. For each, state the original estimate, actual amount incurred, variance, and reason for the variance.

RESPONSE:

Respectfully Submitted,

CITY OF CHATTANOOGA

By: Phillip A. Noblett by FLH w/permission

Phillip A. Noblett (BPR No. 10074)
City Attorney
Kathryn McDonald (BPR No. 30950)
Assistant City Attorney
100 East 11th Street, Suite 200
City Hall Annex
Chattanooga, TN 37402
Telephone: (423) 643-8250
pnoblett@chattanooga.gov
kmcdonald@chattanooga.gov

CHAMBLISS, BAHNER & STOPHEL, P.C.

By: ______________________

Frederick L. Hitchcock (BPR No. 5960)
Cecilia Garrett (BPR No. 38658)
Liberty Tower
605 Chestnut Street, Suite 1700
Chattanooga, TN 37450
Telephone: (423) 757-0222
Facsimile: (423) 508-1222
rhitchcock@chamblisslaw.com
cgarrett@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:

Robert (Bob) C. Lane
Ryan A. Freeman, Esq., Corporate Counsel
Tennessee-American Water
109 Wiehl Street
Chattanooga, TN 37403
bob.lane@amwater.com
ryan.freeman@amwater.com

Melvin J. Malone
Butler Snow LLP
1320 Adams Street, Suite 1400
Nashville, TN 37208
melvin.malone@butlersnow.com

Shilina B. Brown
Vance L. Broemel
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202
shilina.brown@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 12th day of August 2026.

For Chambliss, Bahner & Stophel, P.C.