

September 3, 2026

Electronically Filed in TPUC Docket Room  
on September 3, 2026 at 3:10 p.m.

**VIA ELECTRONIC FILING**

Hon. Herbert H. Hilliard, Chairman  
c/o Ectory Lawless, Docket 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)

**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 [Legal Fees], TPUC Docket No. 24-00032***

Dear Chairman Hilliard:

Attached for filing please find *Tennessee-American Water Company's Supplemental Response to Consumer Advocate's Discovery Request No. 1-1* in the above-captioned matter.

Please note that Confidential 1-1 Response Attachment contains **CONFIDENTIAL INFORMATION** and are being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version are attached.

As required, 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

Attachment

cc: Phil Drennan, TAWC  
Shilina Brown, 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 [LEGAL  
FEES]**

**DOCKET NO. 24-00032**

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**TENNESSEE-AMERICAN WATER COMPANY’S SUPPLEMENTAL RESPONSE  
TO CONSUMER ADVOCATE’S DISCOVERY REQUEST NO. 1-1**

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Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Supplemental Response to First Discovery Request No. 1-1 propounded by the Consumer Advocate Division of the Tennessee Attorney General (“Consumer Advocate”).

**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.

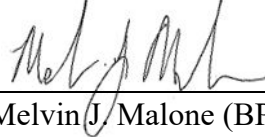
6. TAWC's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of TAWC's 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 Consumer Advocate's discovery requests.

RESPECTFULLY SUBMITTED,



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*Attorneys for Tennessee-American Water Company*

**TENNESSEE AMERICAN WATER COMPANY  
TENNESSEE PUBLIC UTILITY COMMISSION  
DOCKET NO. 24-00032  
FIRST DISCOVERY REQUEST OF THE  
CONSUMER ADVOCATE DIVISION**

**Responsible Witness:** Philip J. Drennan

**Question:**

**1-1.** Provide the total amount incurred to date for rate case expenses and the total amount the Company estimates it will incur through the conclusion of this proceeding.

**Response:**

There are two sets of invoices and total amounts responsive to this request. The first set of invoices account for the total amount for rate case expense invoices related to the general rate case that were incurred for the primary general rate case phase (before filing, after filing, and subsequent to the hearing on the merits as indicated in other DR responses). The second set of invoices account for the total amount incurred to date related to the pending proceeding for the consideration of rate case expenses pursuant to the Company's November 7, 2025 Petition for Recovery of Rate Case Expenses.

The first set of invoices were produced to the Intervenor on January 22, 2026 and total \$1,600,169.00. Of that, the Company reduced its expense by \$79,672, with the Company's response to the City's Data Request 4-21. The second set of invoices will be produced in response to this request as soon as it is practicable.

The Commission's decision to have rate case expenses addressed in a separate proceeding has resulted in legal costs that were not anticipated in the Company's original estimate of costs submitted with the May 1, 2024 rate case petition. This second set of invoices incurred in support of the Petition for Recovery of Rate Case Expenses and for which the Company seeks recovery currently total \$83,216.00. Given the protracted length of this docket, especially the rate case expense recovery phase, the Company cannot reliably estimate the remaining legal expenses for the remaining phase, but is willing to provide monthly invoices on a rolling basis. The reasonable and prudent unanticipated expenses incurred by TAWC as a result of this separate proceeding should be approved by the Commission at or subsequent to the December 14, 2026 hearing on the merits.

Additionally, the Company will supplement this response as additional expense-recovery-phase invoices become available. Further, TAWC will submit any such additional invoices for expenses incurred but not submitted prior to the December 14, 2026 hearing on the merits related to the Petition for Recovery of Rate Case Expenses as soon after the hearing as is practicable for review by the Commission and the Intervenor and for approval by the Commission. As set forth in the Petition for Recovery of Rate Case Expenses, the Company is requesting that these unanticipated rate case expenses be recovered over a three (3) year period via a customer surcharge.

**Supplemental Response:** The Company's minimally redacted second set of invoices referenced in the original response are attached hereto as **CONFIDENTIAL 1-1 Response Attachment**, and contains **CONFIDENTIAL INFORMATION** and is being submitted **UNDER SEAL**. This second set of invoices account for the total amount incurred to date related to the pending proceeding for the consideration of rate case expenses pursuant to the Company's November 7, 2025, Petition for Recovery of Rate Case Expenses.

# **Privilege Log and Billing Invoices**

**[CONFIDENTIAL]**

**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 [LEGAL  
FEES]**

**DOCKET NO. 24-00032**

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**VERIFICATION**

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STATE OF IL )

COUNTY OF Cook )

I, PHILIP DRENNAN, 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.



PHILIP DRENNAN

Sworn to and subscribed before me  
this 27<sup>th</sup> day of August, 2026.

  
Notary Public

My Commission expires: Nov 4, 2028



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:

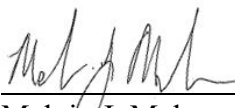
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*Union Counsel*

This the 3<sup>rd</sup> day of September 2026.

  
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Melvin J. Malone