

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

IN RE:)	
)	
PETITION OF TENNESSEE-)	
AMERICAN WATER COMPANY)	DOCKET NO. 25-00002
REGARDING THE 2025 PRODUCTION)	
COSTS AND OTHER PASS-)	
THROUGHS RIDER)	

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO TENNESSEE AMERICAN WATER COMPANY**

This Second Set of Discovery Requests is hereby served upon Tennessee-American Water Company (“TAWC” or the “Company”), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11. The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Vance L. Broemel, on or before 2:00 p.m. (Central), March 12, 2024.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate’s First Set of Discovery Requests to TAWC* sent to the Company on February 11, 2025, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND SET OF DISCOVERY REQUESTS

- 2-1. **Jasper Highlands Water Sales – Source & Support.** Refer to the Company File <TAWC EXH RCL 1 Revised>, Tab “Support Workpaper” that was included with the Company’s response to Consumer Advocate DR No. 1-2. Specifically refer to Cell G24 of this spreadsheet which now has a revised value of 102,994 in water sales (100 gallons) for Jasper Highlands. Although the Company’s response states that “this cell had no impact on the calculation of the Jasper Highlands Adjustment”, this cell is used as a component of the Pro Forma Water Sales for the Base Rate Cost on the “PCOP Calc Exhibit” tab of this spreadsheet. The new formula for calculating this amount appears to be based on applying 0.10% to the Company’s total water system deliveries of 102,994,325. Provide the source and support for the Company’s application of 0.10% for the Jasper Highlands historical water sales.

RESPONSE:

- 2-2. **New Base Amounts – Source & Support.** Refer to the Company’s response to Consumer Advocate DR No. 1-6 regarding the authorized PCOP amounts approved by the Commission from the Company’s Rate Case in TPUC Docket No. 24-00032. In addition to the expenses identified in the Company’s response, provide the source and support for the following information also adopted by the Commission from TPUC Docket No. 24-00032 that are necessary to compute the base cost in future PCOP filings:
- a. Water Sales;
 - b. Gross Receipts Tax Percentage;
 - c. Uncollectible Expense Percentage;
 - d. Forfeited Discount Percentage; and
 - e. Review Period.

RESPONSE:

RESPECTFULLY SUBMITTED,

Vance L. Broemel

VANCE L. BROEMEL (BPR No. 011421)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-8733

Fax: (615) 741-1026

Email: Vance.Broemel@ag.tn.gov

TPUC Docket No. 25-00002

CA's 2nd DR to TAWC

CERTIFICATE OF SERVICE

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

Robert C. Lane
Senior Manager, Rates and Regulatory
Tennessee-American Water Company
109 Wiehl Street
Chattanooga, TN 37403
Email: Bob.Lane@amwater.com

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

This the 4th day of March, 2025.



VANCE L. BROEMEL
Senior Assistant Attorney General