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March 12, 2025

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on March 12, 2025 at 2:41 p.m.

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

RE: *Petition of Tennessee-American Water Company Regarding The 2025 Production Costs and Other Pass-Throughs Rider*, TPUC Docket No. 25-00002

Dear Chairman Jones:

Attached for filing please find *Tennessee-American Water Company's Responses to Second Set of Discovery Requests of the Consumer Advocate* in the above-captioned matter.

As required, copies will be mailed to your office. 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

clw

Attachments

cc: Bob Lane, TAWC
Karen H. Stachowski, Consumer Advocate Unit
Vance Broemel, Consumer Advocate Unit

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Nashville, TN 37208

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BUTLER SNOW LLP

92745403.v1

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

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

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

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Response to Second Set of Discovery Requests propounded by the Consumer Advocate Division of the Attorney General’s Office (“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 the Consumer Advocate's discovery requests.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00002
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness:

Question:

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:

The Company is not using a new formula. The Company used the same methodology utilized in the 2023 and 2024 PCOP. However, the Jasper Highlands actual water sales of 317,099 for the period of December 2023 through November 2024 is a more accurate methodology. Please see “Response to Staff DR_2.1_Attachment” for an updated PCOP calculation. The Company will also reflect this changed methodology in its Rebuttal Testimony in this proceeding.

Tennessee American Water
2024 PCOP Reconciliation

#N/A

Workbook Information: This workbook calculates the PCOP surcharge percentage based on the reconciliation of PCOP related costs for the year December 2023 - November 2024.

Worksheet Name	Description / Purpose of Worksheet
1. Link In	1. Links in from each expense, authorized expense and sales from last rate case, current sales and system delivery and over-under collection.
2. PCOP Calc Exhibit	2. Calculation of the current PCOP rate.
3. Support Workpaper	3. Current expenses adjusted for Non-Revenue Water compared to authorized expenses from the last rate case.
4. Usage&Sysdel	4. Usage and system delivery for the 12 months ending November 2024.
5. Jasper Highlands Workpaper	5. Jasper Highlands adjustment calculation for each expense, water sales, and revenues included in calculation of PCOP.
6.	6.
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There are three (3) other worksheets that are left blank intentionally and are used to identify and separate the Other Support, Exhibit and Workpaper worksheets.

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Description	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Total
Purchased Water	9,048	9,872	7,249	8,561	9,972	13,665	33,855	23,877	32,461	26,494	27,523	12,464	215,041
Purchased Power	216,921	257,662	224,871	227,322	210,860	217,333	255,217	274,751	283,423	277,106	257,459	201,019	2,903,942
Chemicals	184,550	221,820	199,434	184,064	173,708	213,179	9,088	435,193	232,844	214,263	219,890	180,733	2,468,765
Waste Disposal	90,164	29,985	11,179	133,854	75,335	61,094	23,234	39,306	131,621	23,646	31,055	137,557	788,031
TRA Inspection Fee (Amortized in 16530000)	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	264,561
Total	522,730	541,385	464,780	575,848	491,922	527,317	343,441	795,174	702,395	563,556	557,974	553,819	6,640,340

Amounts Approved in Docket 12-00049

Total	
Purchased Power	2,678,772 From Docket 12-00049 Files - 'CAPD Exhibits for Revenue Requirement in TAWC Rate Case 12-00049-SETTLEMENT6.xlsx
Chemicals	986,930
Purchased Water	51,331
TRA Inspection Fee	131,826
Waste Disposal	213,308

Authorized Sales in 100 Gallons 100,578,654 From Docket 12-00049

Projection of Annual Revenues from Last Rate Order: 47,073,724 From Docket 12-00049

	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Total
System Delivery	10,348,999	11,853,394	10,337,237	11,000,349	10,659,443	11,294,702	11,985,749	12,758,952	13,026,001	12,241,213	12,259,950	10,806,248	138,572,236
Water Sales	7,710,381	8,232,685	7,411,494	7,411,494	7,596,482	7,335,289	8,666,364	10,416,644	9,540,929	10,579,466	9,512,259	8,580,837	102,994,325
													2,415,671
													2.40%
2024 Under Refund	(436,223)												

Whitwell Adjustment

	Purchased Water 11/30/2024	Fuel & Power 11/30/2024	Chemicals 11/30/2024	Waste 11/30/2024	Total 11/30/2024	
Actual expenses included in this filing	\$160	\$ 122,153	\$ 98,221	\$ 340,196	\$560,729	<---Use to allocate base year total to each category for Workpaper
Settled upon base year expense from 21-00006	\$ 176,147					
Settled upon base year usage from 21-00006	1,527,738					
Base Revenues from 6/30/12 Whitwell Audited Financials	\$ 1,242,200					

Jasper Highlands

Actual expenses included in this filing	\$ 164,262	\$ 36,130		\$ 200,391	<---Use to allocate base year total to each category for Workpaper
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	2017	2018	2019	2020	2021	2022	2023
Base Revenues from Jasper Highlands Audited Financials	\$ 178,650	\$ 258,971	\$ 316,873				
Normalized Actual Annual JH Revenues from TAWC Unaudited Financials					\$ 334,939	\$ 463,271	
Normalized Actual Annual JH PCOP Expenses from TAWC Unaudited Financials					106,481	107,001	
Actual Annual Water Sales from Jasper Highlands		86,255	98,969				
Normalized Actual Annual JH Water Sales from TAWC Unaudited Financials					140,642	197,613	

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Tennessee American Water Company
Docket No. 25-000XX

Calculation of Production Costs and Other Pass-Throughs ("PCOP") Including Non-Revenue Water
To Determine PCOP Tariff Rider
Actuals for the Year Ending November 30, 2024

Line Number	Description	Amount
<u>I. Calculation of the Base Rate Cost of Production Costs and Other Pass-Throughs as authorized in the Base Rate case (*):</u>		
1	Pro Forma Production Costs and Other Pass-Throughs	\$4,382,511
2	Pro Forma Water Sales (WS) in 100 Gallons	102,423,491
3	Base Rate Cost per 100 Gallons WS (Line 1 / Line 2)	<u>\$0.04279</u>
<u>II. Deferral calculation - Actual Non-Revenue Water Cost Production Costs and Other Pass-Throughs (adjusted for 15% NRW) vs. the Base Rate Cost (**):</u>		
4	Actual Production Costs and Other Pass-Throughs	\$6,640,340
5	Over-Under Collection Adjustment	436,223
6	Review Period PCOP Costs Adjusted for Over-Under Collections	7,076,564
7	Actual Water Sales (100 Gallons)	<u>102,994,325</u>
8	Actual Rate Cost Production Costs and Other Pass-Throughs per 100 Gallons WS (Line 6 / Line 7)	\$0.06871
9	Base Rate Cost per 100 Gallons WS (Line 3)	<u>0.04279</u>
10	Incremental Change in Production Costs and Other Pass-Throughs per 100 Gallons WS (Line 9 - Line 8)	\$0.02592
11	Base Rate Case Water Sales 100 Gallons (Line 2)	<u>102,423,491</u>
12	Deferral Amount (Line 10 * Line 11)	<u>\$2,654,831</u>
<u>III. Calculation of Production Costs and Other Pass-Throughs ("PCOP") Tariff Rider</u>		
13	Total Deferred Amount (Line 12)	\$2,654,831
14	Total Deferred Amount Grossed Up for revenue taxes (Line 13 / (1.0-.03191) (***)	2,742,339
15	Projected Annual Base Rate Revenue subject to PCOP (*)	<u>48,494,574</u>
16	PCOP % (Line 14 / Line 15)	<u>5.65%</u>

(*) The numbers are taken from the settlement agreement in Docket No. 12-00049 and include the Whitwell adjustment from Docket No. 21-00006, as well as a proposed adjustment for Jasper Highlands. The Projected Annual Base Rate Revenue subject to PCOP on Line 15 includes revenues from Docket No. 12-00049, as well as proposed adjustments to include Whitwell and Jasper Highlands base revenues.

(**) The numbers are actuals for the year ended November 30, 2024 including Non-Revenue Water for Purchased Power and Chemicals.

(***) Assumes Gross Receipts Tax @ 3.0%, Uncollectibles @ 1.0571%, and Forfeited Discount Rate @ -0.8661%.

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Tennessee American Water Company
Docket No. 25-000XX
For the Twelve Months Ending November 30, 2024
PCOP Actual Expenses

Line #	Description	A	B	C	D	E	F	G	H
		For the 12 Months Ending 11/30/2024	**NRW Limited 12 Mos Ending 11/2023 (Column A, Lines 2 and 3 x Line 18 Recoverable %)	Authorized Amount Per Docket 12-00049	Whitwell Adjustment as Settled per Docket 21-00006	Jasper Highlands Proposed Adjustment	B - (C + D + E) Difference NRW Limited from Authorized Docket 12-00049	Adjust Difference for TRA Fee Recovered Via SEC, EDI, or QIIP 12 Months Ending 11/30/2024	F - G Adjusted Difference
1	Purchased Water Including Wheeling Charges	\$215,041	\$215,041	\$51,331	\$50	\$109,215	\$54,444	\$0	\$54,444
2	Purchased Power**	2,903,942	2,903,942	2,678,772	38,373	34,982	\$151,815		151,815
3	Chemicals**	2,468,765	2,468,765	986,930	30,855		\$1,450,980		1,450,980
4	Waste Disposal	788,031	788,031	213,308	106,869		\$467,854		467,854
5	TRA Inspection Fee	264,561	264,561	131,826	0		\$132,735		132,735
6									
7	Total	\$6,640,340	\$6,640,340	\$4,062,167	\$176,147	\$144,197	\$2,257,829	\$0	\$2,257,829
8									
9									
10	Water Sales in 100 Gallons	102,994,325	102,994,325	100,578,654	1,527,738	317,099		102,994,325	
11									
12	Cost per 100 Gallons (Line 7 / Line 10)	\$0.06447	\$0.06447	\$0.04039	\$0.11530	\$0.45474	\$0.02408	\$0.00000	\$0.02408
Recoverable % for Production Costs		For the 12 Months Ending 11/30/2024							
13	Water System Delliveries	102,994,325							
14	Unaccounted for Water	138,572,236							
15	Non-Revenue-Unaccounted for Water % [1 - (Line 13 / Line 14)]	0.0%							
16	Non-Revenue-Unaccounted for Water % Authorized	15.0%							
17	Variance (If Line 15 > Line 16 then Line 15 - Line 16)								
18	Recoverable % (1 - Line 17)	100.0%							

**Non-Revenue Unaccounted for Water is only applied to purchased power and chemicals.

Tennessee American Water Company
Docket No. 25-000XX
For the Twelve Months Ending November 30, 2024
Usage

	Water Usage	System Delivery	NRW %
2023 Dec	7,710,381	10,348,999	25.50%
2024 Jan	8,232,685	11,853,394	30.55%
2024 Feb	7,411,494	10,337,237	28.30%
2024 Mar	7,411,494	11,000,349	32.62%
2024 Apr	7,596,482	10,659,443	28.73%
2024 May	7,335,289	11,294,702	35.06%
2024 Jun	8,666,364	11,985,749	27.69%
2024 Jul	10,416,644	12,758,952	18.36%
2024 Aug	9,540,929	13,026,001	26.75%
2024 Sep	10,579,466	12,241,213	13.58%
2024 Oct	9,512,259	12,259,950	22.41%
2024 Nov	8,580,837	10,806,248	20.59%
	102,994,325	138,572,236	25.67%

Tennessee American Water Company
Docket No. 25-000XX
For the Twelve Months Ending November 30, 2024
Jasper Highlands Acquisition Adjustment Calc

	Year	Billed Usage	Water Sales Revenue	Purchased Water	Purchased Power	Total PCOP	Customer Count	Customer Count Source:	Yearly Purchased Water per Customer	Yearly Purchased Power per Customer	Yearly PCOP per Customer
A/	2017	3,379,792	\$ 178,650	\$ 16,362	\$ 5,241	\$ 21,603	70	C/	\$ 234	\$ 75	\$ 309
B/	2024		\$ 670,723	\$ 164,262	\$ 36,130	\$ 200,391	467	D/			
					\$ 109,215						
					\$ 34,982						
					<u>\$ 144,197</u>						

A/ 20-00011 - REVISED CONFIDENTIAL Exhibit DB-3 - Jasper Highlands Water System - Financial Statements 2017.xlsx
B/ CO. Exh, tab Jasper Workpaper
C/ 20-00011, Confidential attachment Dr 1-13
D/ Tab "JH Bill Anaylsis"

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00002
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness:

Question:

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:

As the review period for the PCOP Petition that is the subject of Docket No. 25-00002 as December 1, 2023, through November 30, 2024, TAWC objects to this request on the grounds that it is irrelevant and burdensome in that it seeks information that is not related to this Petition. TAWC further objects on the grounds that this request seeks information that is unknown and/or not yet available to TAWC or information that is available to the Consumer Advocate Division in the same manner and to the same extent it is available to the Company. The Tennessee Public Utility Commission has not issued a written decision in TPUC Docket No. 24-00032. Absent the written order, the Company does not yet have sufficient information that is necessary with respect to the inquiries in subsections a, b, c and d above.

Subject to and without waiving the foregoing objections, the Company responds as follow: The Company does not believe that the Commission changed the review period for the PCOP, as that was not an issue in the Rate Case.

In the spirit of good faith cooperation and in light of CAD/'s inquiries related to Docket No. 24-00032, TAWC recognizes and notes that the PCOP percentage is authorized in Docket No. 25-00002 will be applied to the base rates emanating from Docket No. 24-00032. The going forward implications of this is that the PCOP percentage should be calculated based on a revenue of \$71,148,607, rather than \$48,494,574, resulting in a PCOP percentage of 3.85%. Please see "Response to Staff DR_2.2_Attachment" for an updated PCOP calculation reflecting this change in the denominator used to calculate the PCOP percentage.

III. Calculation of Production Costs and Other Pass-Throughs ("PCOP") Tariff Rider			
		As Filed	Per 24-00032 Motion
13	Total Deferred Amount (Line 12)	\$2,654,831	\$2,654,831
14	Total Deferred Amount Grossed Up for revenue taxes (Line 13 / (1.0-.03191) (***)	2,742,339	2,742,339
15	Projected Annual Base Rate Revenue subject to PCOP (*)	48,494,574	71,148,607
16	PCOP % (Line 14 / Line 15)	5.65%	3.85%

Tennessee American Water
2024 PCOP Reconciliation

#N/A

Workbook Information: This workbook calculates the PCOP surcharge percentage based on the reconciliation of PCOP related costs for the year December 2023 - November 2024.

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1. Link In	1. Links in from each expense, authorized expense and sales from last rate case, current sales and system delivery and over-under collection.
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3. Support Workpaper	3. Current expenses adjusted for Non-Revenue Water compared to authorized expenses from the last rate case.
4. Usage&Sysdel	4. Usage and system delivery for the 12 months ending November 2024.
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Chemicals	184,550	221,820	199,434	184,064	173,708	213,179	9,088	435,193	232,844	214,263	219,890	180,733	2,468,765
Waste Disposal	90,164	29,985	11,179	133,854	75,335	61,094	23,234	39,306	131,621	23,646	31,055	137,557	788,031
TRA Inspection Fee (Amortized in 16530000)	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	22,047	264,561
Total	522,730	541,385	464,780	575,848	491,922	527,317	343,441	795,174	702,395	563,556	557,974	553,819	6,640,340

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													2,415,671
													2.40%

2024 Under Refund (436,223)

Whitwell Adjustment

	Purchased Water 11/30/2024	Fuel & Power 11/30/2024	Chemicals 11/30/2024	Waste 11/30/2024	Total 11/30/2024	
Actual expenses included in this filing	\$160	\$ 122,153	\$ 98,221	\$ 340,196	\$560,729	<---Use to allocate base year total to each category for Workpaper
Settled upon base year expense from 21-00006	\$ 176,147					
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Jasper Highlands

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Tennessee American Water Company
Docket No. 25-000XX

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To Determine PCOP Tariff Rider
Actuals for the Year Ending November 30, 2024

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II. Deferral calculation - Actual Non-Revenue Water Cost Production Costs and Other Pass-Throughs (adjusted for 15% NRW) vs. the Base Rate Cost ():**

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5	Over-Under Collection Adjustment	436,223
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15	Projected Annual Base Rate Revenue subject to PCOP (*)	<u>48,494,574</u>
16	PCOP % (Line 14 / Line 15)	<u>5.65%</u>

(*) The numbers are taken from the settlement agreement in Docket No. 12-00049 and include the Whitwell adjustment from Docket No. 21-00006, as well as a proposed adjustment for Jasper Highlands. The Projected Annual Base Rate Revenue subject to PCOP on Line 15 includes revenues from Docket No. 12-00049, as well as proposed adjustments to include Whitwell and Jasper Highlands base revenues.

(**) The numbers are actuals for the year ended November 30, 2024 including Non-Revenue Water for Purchased Power and Chemicals.

(***) Assumes Gross Receipts Tax @ 3.0%, Uncollectibles @ 1.0571%, and Forfeited Discount Rate @ -0.8661%.

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Tennessee American Water Company
Docket No. 25-000XX
For the Twelve Months Ending November 30, 2024
PCOP Actual Expenses

[illegible]

**Non-Revenue Unaccounted for Water is only applied to purchased power and chemicals.

Tennessee American Water Company
Docket No. 25-000XX
For the Twelve Months Ending November 30, 2024
Usage

	Water Usage	System Delivery	NRW %
2023 Dec	7,710,381	10,348,999	25.50%
2024 Jan	8,232,685	11,853,394	30.55%
2024 Feb	7,411,494	10,337,237	28.30%
2024 Mar	7,411,494	11,000,349	32.62%
2024 Apr	7,596,482	10,659,443	28.73%
2024 May	7,335,289	11,294,702	35.06%
2024 Jun	8,666,364	11,985,749	27.69%
2024 Jul	10,416,644	12,758,952	18.36%
2024 Aug	9,540,929	13,026,001	26.75%
2024 Sep	10,579,466	12,241,213	13.58%
2024 Oct	9,512,259	12,259,950	22.41%
2024 Nov	8,580,837	10,806,248	20.59%
	102,994,325	138,572,236	25.67%

Tennessee American Water Company
Docket No. 25-000XX
For the Twelve Months Ending November 30, 2024
Jasper Highlands Acquisition Adjustment Calc

	Year	Billed Usage	Water Sales Revenue	Purchased Water	Purchased Power	Total PCOP	Customer Count	Customer Count Source:	Yearly Purchased Water per Customer	Yearly Purchased Power per Customer	Yearly PCOP per Customer
A/	2017	3,379,792	\$ 178,650	\$ 16,362	\$ 5,241	\$ 21,603	70	C/	\$ 234	\$ 75	\$ 309
B/	2024		\$ 670,723	\$ 164,262	\$ 36,130	\$ 200,391	467	D/			
					\$ 109,215						
					\$ 34,982						
					<u>\$ 144,197</u>						

A/ 20-00011 - REVISED CONFIDENTIAL Exhibit DB-3 - Jasper Highlands Water System - Financial Statements 2017.xlsx
B/ CO. Exh, tab Jasper Workpaper
C/ 20-00011, Confidential attachment Dr 1-13
D/ Tab "JH Bill Analysis"

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

**PETITION OF TENNESSEE-
AMERICAN WATER COMPANY
REGARDING THE 2025 PRODUCTION
COSTS AND OTHER PASS-
THROUGHS RIDER**

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)
)

DOCKET NO. 25-00002

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 12th day of March, 2025.



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:

Vance L. Broemel, Esq.
Senior Assistant Attorney General
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Consumer Advocate Division
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This the 12th day of March 2025.



Melvin J. Malone